



CITY OF CARMEL-BY-THE-SEA

CITY COUNCIL AGENDA

Contact: 831.620.2000 www.ci.carmel.ca.us

Mayor Dale Byrne
Councilmembers Jeff Baron, Hans Buder, Bob Delves, and
Alissandra Dramov

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

Special Meeting Monday, March 2, 2026 3:00 PM

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/88134597723>

Webinar ID: 881 3459 7723

Passcode: 954379

Dial-in: (253) 215-8782

HOW TO OFFER PUBLIC COMMENT

The public may give public comment at this meeting in person, or use 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 cityclerk@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.

PUBLIC COMMENT GUIDELINES FOR SPECIAL MEETINGS

During Special City Council Meetings, public comments are permitted on items listed on the agenda. After each item on the agenda is introduced, the Mayor will invite public comment on that item. Each speaker has 3 minutes to speak unless otherwise adjusted by the Mayor. While stating your name is optional, it helps to identify speakers in the meeting minutes. Remote or in-person participants who do not comply with the requirements of the Brown Act will be muted.

CALL TO ORDER AND ROLL CALL

TOUR OF INSPECTION – 3:00 PM

The City Council will conduct an on-site tour of inspection of the property listed on the agenda (below) and the public is invited to attend the tour. After the tour is complete, the Council will begin the meeting in the City Council Chambers no earlier than 3:30 p.m.

- A. Tour Location - PG&E Utility Pole in front of Carmelo 4 southeast of 10th Avenue;
Coordinates: 36.549328, -121.926906 (APP 26046 - Verizon Sequoia Deployment)

CALL TO ORDER AND ROLL CALL - CHAMBERS 3:30 PM

PUBLIC HEARINGS

- 1) Resolution 2026-014 – Consideration of an Appeal (APP 26046, Verizon Sequoia Deployment) appealing the Planning Commission's decision to deny 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.

RECESS

The City Council will take a 30-minute break around 6:30 p.m. if needed.

ADJOURNMENT

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.

CORRESPONDENCE RECEIVED AFTER THE POSTING OF THE AGENDA

Any correspondence or supplemental materials related to items on this agenda that are received after the agenda has been posted will be distributed to the City Council and made available for public review at City Hall (Monte Verde Street between Ocean and Seventh Avenues) during regular business hours. Written comments emailed to the City Clerk will not be read aloud, but will be posted online with the related agenda at: <https://carmelbytheseaca.portal.civicclerk.com/>.

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
City Council
Staff Report

March 2, 2026
PUBLIC HEARINGS

TO: Honorable Mayor and City Council Members

SUBMITTED BY: Jacob Olander, Associate Planner

APPROVED BY: Brandon Swanson, Acting City Administrator

SUBJECT: Resolution 2026-014 – Consideration of an Appeal (APP 26046, Verizon Sequoia Deployment) appealing the Planning Commission’s decision to deny 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.

RECOMMENDATION:

Staff recommends the City Council 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;*
2. Denying an Appeal of the Planning Commission’s decision to deny 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; and
3. 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.

BACKGROUND / SUMMARY:

EXECUTIVE SUMMARY

On February 10, 2026, the Planning Commission adopted Resolution No. 2026-002-PC denying a Use Permit, Design Review, and Coastal Development Permit to allow the construction of a Small Wireless Facility on a replacement PG&E utility pole located within the Carmelo Street right-of-way. On February 13, 2026, the appellant (Sequoia Deployment Services Inc., on behalf of Verizon Wireless aka Sequoia Development/Verizon) filed a timely appeal of the Planning Commission's decision to deny the requested entitlements. As discussed in detail within the "Staff Analysis" section below, the appellant contends that the denial violated the Federal Telecommunications Act of 1996, Federal Communications Commission regulations, and California Public Utilities Code Section 7901. The appellant further asserts that the denial was not supported by the Carmel-by-the-Sea Municipal Code, General Plan, or Administrative Detailed Wireless Facility Design Guidelines.

BACKGROUND AND PROJECT DESCRIPTION

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 item before the Council is the first Type III wireless application that the City has received since the 2025 ordinance went into effect.

The DR 25313 & UP 25314 (Sequoia Development/Verizon) 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 10th Avenue. [Carmel-by-the-Sea 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. The application included requests for two special exceptions because the facility was proposed to be located within the right of way in the R1 zone and within 5 feet of a residential window.

Actions Prior to Public Hearings

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, 2026, inadvertently exceeding the requirement contained in CMC Section 17.46.070.A.1, which requires 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 Sequoia Deployment/Verizon, application materials on the city website and other outreach, the city has received correspondence from concerned residents. City staff met with these residents to discuss the application and understand their concerns. In summary, the residents did not think that the project met the CMC (placement of the wireless facility in a residentially zoned district and within 5 feet of a residential window), the facility, as proposed, was not aesthetically pleasing nor aligned

with Carmel-by-the-Sea's character, there was lack of demonstration of a significant coverage gap, and the loss to property values. Additionally, residents raised concerns about how approval of the project would result in the proliferation of similar facilities.

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 and 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), which establishes certain procedural and substantive limits on local wireless facility siting, applies to facilities that are used for commingled services. Section 332(c)(7). 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.

In accordance with CMC Section 17.46.060.B, the City enlisted technical assistance from a professional consultant, CTC Telecommunications Network Consulting (CTC), to conduct an independent analysis of the existing coverage and performance of Verizon's network in the area of proposed service, the proposed wireless facility components, drive test data and performed an independent Radio Frequency (RF) emissions exposure analysis. (See report titled "Review of the Application of Verizon Wireless to Install a New Small Wireless Facility", prepared by CTC Telecommunications Network Consulting, dated January 2026). With the information available at that time, CTC's report concluded that a coverage gap exists, installation of the proposed facility would reduce low-band traffic resulting in fewer dropped calls, provide mid-band coverage, provide current generation of 5G transmission, would provide only mid-band Verizon wireless service and would fully comply with FCC regulations for RF emissions exposure levels.

Planning Commission Hearings

The project was scheduled for hearing at the January 21, 2026, Planning Commission meeting. Prior to commencement of the hearing, a large volume of correspondence, technical information, and legal arguments were received. As recommended by staff, the Planning Commission took testimony from staff, the applicant and the public, and continued the hearing on the project to a date certain of February 4, 2026 to allow

additional time for staff and the Commission to consider the additional information.

On January 30, 2026, the day the staff report was scheduled to be published, staff received additional technical reports from the applicant as well as additional correspondence from the public. Therefore, staff recommended the Commission grant an additional continuance to allow staff, CTC and the Commission sufficient time to analyze and consider the new information. The Commission continued the February 4, 2026, hearing to February 10, 2026.

At the February 10, 2026, Planning Commission meeting, the Commission adopted Resolution No. 2026-002-PC and denied the application as recommended by city staff.

Testimony was received from the applicants, residents, and associated technical and legal representation. The Planning Commission determined that the applicant did not meet its burden to be granted the special exceptions for effective prohibition under federal law. Under the significant gap/least intrusive means test, the proposed small wireless facility on a replacement PG&E utility pole was not the least intrusive means to address Verizon's alleged coverage gap. The Commission also found the applicant did not meet the materially inhibits standard for federal effective prohibition, and denial would not violate the applicant's state law franchise. Additionally, because the site did not meet the findings for special exceptions, they found that the project did not conform with the municipal code, general plan, and design guidelines. The decision notice was sent to the applicant, posted on site, and hand delivered to neighbors within 100 feet of the project site on February 11, 2026.

Filing of Appeal

On February 13, 2026, the applicant filed a timely appeal of the Planning Commission's decision on the Sequoia Development/Verizon application to the City Council (see Attachment 2) which outlines reasons they believe a denial of their application violates state and federal laws. The applicant summarizes, "denial violated federal and state telecommunications law, including the federal Telecommunications Act of 1996, Federal Communications Commission regulations, and California Public Utilities Code Section 7901. Further, the denial was not supported by the City of Carmel-by-the-Sea Municipal Code, General Plan, or *Administrative Detailed Wireless Facility Design Guidelines*." This was supplemented by a letter dated February 24, 2026 from the applicant's attorney outlining additional reasons for the appeal. The applicant also submitted new evidence in the form of more technical reports and a third response to comments and issues. Staff obtained two additional reports for CTC to evaluate Verizon's new evidence. Below, staff provides an analysis of each of the claims by the applicant in their appeal.

In summary, there is an argument, supported by facts, that the Golden Bough Theater could be a technically viable and less intrusive location for a wireless facility to address Verizon's alleged coverage gap. Due to this potential, and the lack of supporting data from the applicant clearly demonstrating that the Golden Bough site is not viable, as well as staff's analysis of the merits of Verizon's other appeal claims and new evidence, and CTC's evaluation of it, it is staff's recommendation that the City Council deny the

appeal (see draft Resolution in Attachment 1).

1. Claim: The Denial of the Project is in Violation of Federal Law Because the Decision is Not Supported by Substantial Evidence.

U.S Code Title 47, Chapter 5, subchapter III, Part I, section 332.c.7.B.iii, states that any decision by a State or local government or instrumentality thereof to deny a request to place, construct, or modify personal wireless service facilities shall be in writing and supported by substantial evidence contained in a written record.

In making this claim, Verizon observed that the Planning Commission's denial focused on the Golden Bough alternative being technically feasible and available. Verizon argues that they have met their burden for granting the requested special exceptions by providing ample evidence that the Golden Bough Theater is not a feasible alternative to fill their coverage gap in service and the City has not provided substantial evidence to rebut Verizon's evidence and testimony. The applicant separately made a claim that denial would be an effective prohibition (below Claim 3) and also provided new evidence regarding Golden Bough after filing its appeal. Further discussion of the Golden Bough alternative is below in Claim 3. Further discussion of the other Planning Commission findings that Verizon disputes is below in Claim 5.

Staff Analysis:

See Staff Analysis under Claim 3.

2. Claim: The Denial of the Project is in Violation of Federal Law Contained in U.S. Code section 332, - Dictation of Technology.

Verizon's attorney presented an argument that because the Golden Bough Theater Macro Design would require a different technology than the proposed small wireless facility, the denial of their small wireless facility would violate federal telecommunication law by dictating the technology Verizon would use to provide service. Verizon relies on a single case (*New York SMSA Ltd. Partnership v. Town of Clarkstown*, 612 F.3d 97, 105-107 (2nd Circuit 2010)) to suggest that the city cannot require Verizon to consider a macro facility alternative on Golden Bough.

Staff Analysis:

Verizon chose to provide a report by PierCon that showed the macro design for the Golden Bough Theater that showed it would be a technically feasible way to address the alleged coverage gap. The case Verizon relies on is not applicable to Verizon's obligation to provide a comprehensive alternatives analysis to support its effective prohibition claim. The *Clarkstown* case involved a claim that a wireless ordinance was facially preempted by federal law because it legislated a preference for certain technologies. That case recognized that local governments can reject an application on the grounds of least intrusive means that involved other technologies or sites. More recent cases also support the view that least intrusive means alternatives analysis need not be limited only to technologies and locations of the applicant's choosing. To the contrary, the court cases provide that the alternatives analysis must be comprehensive. Additionally, Verizon has included alternative technologies and a variety of locations in

the right of way and on parcels and buildings in other analyses. Two recent examples are: *GTE Mobilnet of California Ltd. P'ship d/b/a Verizon Wireless v. City of Berkeley*, No. 20-CV-05460-DMR, 2023 WL 2648197, at *26 (N.D. Cal. Mar. 27, 2023) (Verizon's alternatives analysis evaluated ten alternative sites for the proposed facility: a microcell network, three façade-and roof-mounted facilities, and six freestanding tower facilities.); and *Cellco Partnership, d/b/a Verizon Wireless v. White Deer Township Zoning Hearing Board*, 74 F.4th 96 at 101 (2023 3rd Circuit) (Verizon considered several alternatives to the proposed site on a privately owned parcel within the service gap, including using other wireless facilities, building a tower in a distant agricultural district, erecting a smaller tower, using a Distributed Antenna System instead of a monopole and using a Pennsylvania Department of Transportation facility). And as noted, Verizon also did so here with its discussion of small cell and macro options on private property at Golden Bough.

Staff does not recommend approving Verizon's appeal on the basis of this claim.

3. Claim: The Denial of the Project is in Violation of Federal Law Contained in U.S. Code section 332, – Prohibition of Service and Materially Inhibit Verizon.

U.S Code Title 47, Chapter 5, subchapter III, Part I, section 332.c.7, states nothing in Chapter 5 shall limit or affect the authority of local governments except decisions cannot prohibit or effectively prohibit the provision of personal wireless service. There are two tests for effective prohibition in the Ninth Circuit: (1) significant gap/least intrusive means and (2) materially inhibits standard applicable to small cells. Verizon claims that denial of the application would constitute a prohibition of service under the first test because they have a significant gap in service and their proposed site is the least intrusive means to fill their coverage gap. They further state that denial would materially inhibit their ability to, "introduce new 5G services, improve existing service, and densify the network."

Staff Analysis:

Effective Prohibition Claim.

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.^[1] 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.^[2] 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."^[3] 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."^[4]

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, their Supplemental Report #3 received on February 10, 2026, and their Supplemental Report #4 dated February 23, 2026, the City Council 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.

City contracted engineering firm CTC performed modeling for the macro design on the Golden Bough Theater. Based on their modeling, the Golden Bough would be able to address the alleged coverage gap. The report identifies that the tree trunk and branches would not have a significant impact on mid-band frequency antennas; however, could potentially cause issues for high frequency bands. Additionally, on February 20, 2026, city staff provided a letter to Sequoia Deployment Service, Inc., stating that the city would be able to work with the owners of the Golden Bough Theater to trim the branches that would cause signal attenuation. The Planning Commission found that Verizon has not provided sufficient evidence to show that the Golden Bough Theater is not a technically viable location to address the alleged coverage gap.

CTC reviewed PierCon's Supplemental Report #4 and found the report did not provide sufficient evidence to support the need for the proposed small wireless facility to address their alleged coverage gap. First, the area of the alleged coverage gap is different in this report than in previous reports provided. Further, the architecture of Verizon's proposed network is not a factor in the city's consideration of their application. The Golden Bough Theater has been shown in CTC's modeling to be a technically

feasible location for addressing Verizon's alleged service gap.

CTC provided modeling of the macro design at the Golden Bough Theater and determined that it would be a technically feasible site for addressing Verizon's alleged coverage gap, although they did not have access to the data from Verizon to preform uplink modeling. However, their downlink modeling showed that midband coverage provided by a macro design at the Golden Bough Theater would be able to sufficiently address inbuilding coverage concerns. CTC noted that Verizon provided uplink analysis in this report instead of the downlink analysis provided in previous reports. CTC states that downlink modeling is the common tool for network analysis, as opposed to uplink modeling. They also questioned why Verizon did not provide analysis for any downtilt/down-tilt between 2 and 8 degrees.

If the City Council determines that concerns raised about network geometry, near-field vegetation obstruction, extended propagation causing inter-cell interference, and uncertainty regarding availability of the Golden Bough Theater making the theater location technically infeasible then the applicant has presented appropriate information to make a finding that Golden Bough is technical infeasibility.

If the City Council determines that the Applicant has not demonstrated adequately that the Golden Bough Theater is technically infeasible, then this finding cannot be made because the Theater would require less special exceptions to the CMC, 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.

As further bases for rejecting the Golden Bough as the least intrusive alternative, in its February 24, 2026 third volume of responses, the applicant questioned whether Golden Bough owner would even lease its property to Verizon, claimed the cost would be higher than its preferred alternative, and that a facility at Golden Bough would have greater historical resource impacts. These arguments are also not convincing. The evidence in the record shows that as recent as February 25, 2026, the Golden Bough representative confirmed to the city by email that it remains willing to negotiate a lease. Verizon has chosen to incur the cost to place macro facilities on roof-tops within Carmel. Further, the Golden Bough would only require one special exception, for height, and therefore is more compatible with CMC Chapter 17.46. The need for historic review does not make the Golden Bough location more intrusive; there is no evidence that a properly designed installation could not meet the city's historic review requirements.

As the governing body, the City Council must determine, ultimately, if they are able to make this finding based on the evidence and analysis presented. As previously stated, it is recommended that the Council deny Verizon's appeal because staff's opinion, based on analysis of the data, is that the Golden Bough is available, technically feasible and the least intrusive alternative.

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.”^[5] 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.”^[6] Some courts have found that the “materially inhibits” standard requires the “totality of the circumstances” to be considered.^[7] 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.”^[8] 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.”^[9] 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.”^[10] 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.^[11]

To meet this standard, the applicant must show that the denial of its application would materially inhibit the applicant’s ability to compete in a fair and balanced legal and regulatory environment considering the totality of the circumstances such as insufficiency of coverage, a lack of available alternatives, unreasonable costs imposed on the applicant and unreasonable delay in making the decision. The applicant has not met this standard for the following reasons. As discussed above, there is an available alternative at Golden Bough. The applicant’s attorney argues in the letter dated February 24, 2026 that it would have to spend many times more if it had to “relocate” to Golden Bough than to be on its preferred location on a utility pole in the right of way. However, the argument creates a false comparison because it assumes Verizon has the unfettered right to place facilities in the right of way, and that is not correct. As the California Supreme Court has held, the telephone franchise allowing the applicant rent-free use of the right of way under Pub. Util. Code 7901 “is not absolute” but rather it is a “limited right to use the highways ... only to the extent necessary for the furnishing of services to the public.” *T-Mobile W. LLC v. City & Cnty. of San Francisco*, 6 Cal. 5th 1107, 1121 (2019). Where there is a viable option to furnish services from sites outside of the right of way, right of way use is not necessary. Additionally, it is common knowledge that the applicant has placed facilities on parcels that require payment of rent and incur other costs elsewhere in Carmel and beyond. Doing so in this instance would be nothing unusual or extraordinary. The applicant’s argument regarding delay is also unconvincing. Verizon claims to have spent the time since the city adopted the new wireless ordinance studying the complex requirements before submitting its application. However, another plausible explanation for Verizon’s delay in submitting its application is that it was waiting for the opportunity to try to convince the California

Coastal Commission that provisions of the ordinance it did not like should be changed. Only once that attempt failed, did Verizon submit an application. Further, all applications for wireless facilities are subject to FCC shot clocks. An application for a facility on Golden Bough would be a colocation with a 90 day shot clock for action, the same time period as the small cell on a replacement pole the applicant did request.

If the City Council finds that given the totality of the circumstances, the Applicant has met its burden under this standard, the special exceptions should be granted. Staff's recommendation is that the applicant did not meet the burden for a special exception to be granted under the materially inhibits standard.

Also see analysis in Special Exceptions Findings section of the attached draft Resolution (Attachment 1).

4. Claim: The Denial of the Project is in Violation of Verizon's Statewide Franchise Right (California Public Utilities Commission (CPUC) Section 7901).

Verizon claims that the denial of the application violates California Public Utilities Code Section 7901, "which grants telephone corporations a statewide franchise right to place their equipment along any public right-of-way." The Carmel-by-the-Sea Municipal Code's location preferences listing R-1 zoned portions of the public right-of-way as highly incompatible and the Planning Commission's denial of the proposed site due to the Golden Bough Theater being a less intrusive location deprives Verizon Wireless of its rights under CPUC Section 7901.

Staff Analysis:

The applicant need only demonstrate one basis for this exception finding but has offered a second with regard to 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 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. Further, as the California Supreme Court has held, the telephone franchise allowing the applicant rent-free use of the right of way under Pub. Util. Code 7901 "is not absolute" but rather it is a "limited right to use the highways ... only to the extent necessary for the furnishing of services to the public." *T-Mobile W. LLC v. City & Cnty. of San Francisco*, 6 Cal. 5th 1107, 1121 (2019). Where there is a viable option to furnish services from sites outside of the right of way, right of way use is not necessary. Therefore, the applicant has not provided adequate justification for this exception finding simply by repeating its assertion that the restriction itself violates state law.

See analysis in Special Exceptions Findings section of the attached draft Resolution (Attachment 1) and below in the staff report.

5. Claim: The Proposed Project is Consistent with the Required Findings for Approval

Verizon disagrees with the Planning Commission's findings that the proposal conflicts with the city's General Plan (see Mackenzie and Albritton Letter Received February 24, 2026, Attachment 8). They maintain that the General Plan is largely silent on wireless facilities but does explicitly recognize the community benefit of improved communications infrastructure. Verizon notes that the only General Plan policy requiring an alternatives analysis applies exclusively to changes to historic resources, which Verizon claims is irrelevant to its project. Consequently, Verizon argues there is no evidence of non-compliance with the General Plan.

Verizon disagrees with the Planning Commission's finding that the facility would set a precedent for future applications as improper and speculative. Verizon argues that speculative fears regarding future applications do not constitute substantial evidence for denial, noting that any subsequent application would face its own exhaustive review. They contend that denying a facility in the Single Family Residential (R-1) zone based on these fears would effectively serve as an unlawful prohibition of service, given that the majority of the city is zoned R-1.

Verizon refutes the Planning Commission's findings on public safety and welfare concerning a potential "fall zone" hazard for the nearby residence. Verizon points out that the Commission provided no evidence that the replacement pole would fall. Verizon's structural engineering report shows that the proposed PG&E replacement utility pole and small wireless facility would meet all safety standards. Additionally, Verizon notes that both PG&E and the City would inspect the installation to confirm it is structurally sound.

Verizon states that the proposed small cell will not harm the nearby tree. A PG&E arborist confirmed that replacing the utility pole will not adversely affect the tree's root structure because the new pole will be inserted into the exact same hole as the existing 70-year-old pole. Verizon mentions that the city code regulations on placing poles in drip lines of tree only applies to newly installed poles, not replacement poles.

Verizon argues the proposed small cell will have no impact on historic homes. While the Commission noted the pole's proximity to a private property designated on the Carmel Inventory of Historic Resources, Verizon emphasizes that the proposed small wireless facility will be situated on a standard utility pole in the public right-of-way. Verizon insists the project does not require review by the Historic Resources Board or compliance with the Secretary of the Interior's Standards for historic properties because the utility pole itself is not a historic resource.

Finally, Verizon characterizes the Commission's concerns about adverse visual impacts and scenic disruption as vague and lacking substantial evidence. Verizon states the

photo simulations of the small wireless facility show that it will have minimal visual impact, as the pole-top antenna will be viewed against the sky without obstructing highly scenic coastal views. Verizon asserts the equipment shroud will be placed low on the pole and screened by an existing tree, arguing the installation will seamlessly blend with the existing utility infrastructure that already lines the street.

Staff Analysis:

Consistency with General Plan.

The proposed small wireless facility is not consistent with Administrative Detailed Wireless Design Guidelines because the proposed accessory equipment exceeds the maximum of 17 cubic feet of allowable volume, and it therefore is not consistent with the General Plan. The Administrative Detailed Wireless Design Guidelines are a California Coastal Commission certified element of the Carmel-by-the-Sea Local Coastal Program, which is an element of the Carmel-by-the-Sea General Plan.

Future Application Speculation.

The proposed use does not comply with General Use Permit Findings 1, 2, and 3. As demonstrated in the above section and in the attached draft Resolution (Attachment 1), the project does not comply with the Administrative Detailed Wireless Design Guidelines, and therefore General Use Permit Findings 1 and 3 cannot be made. The proposed use does not meet the required findings for special exceptions because the applicant has failed to prove that the denial of the application would violate their rights under Federal or State Law, and because the deviations are not minor deviations that would make the site achieve design objectives as well, or better than, would be achieved through strict adherence to CMC Section 17.46. Further analysis of the required Findings for Use Permits Findings 1, 2, and 3 can be found in the attached draft Resolution (Attachment 1).

Fall Zone.

While the Planning Commission included Fall Zone concerns in their evidence for not being able to make Use Permit Finding 5, the Fall Zone requirements outlined in the CMC Section 17.46 are only applicable to proposed wireless facilities on Towers on private parcels. Use Permit Finding 5 can be made as the site will not be injurious to public health, safety, and welfare.

See analysis in Special Exceptions Findings section of the attached draft Resolution (Attachment 1) and below in the staff report.

Tree Impact.

While the Planning Commission included impact on nearby tree concerns in their evidence for not being able to make Use Permit Finding 7, CMC Section 17.46.040.F.1.f applies to proposed new structures in the dripline of trees, or that would disrupt existing landscaping or hardscape. The applicant has proposed to replace a PG&E utility pole that is already in the dripline of a tree and is not in hardscape or landscaping. Use Permit Finding 7 can be made as the site will not have adverse impacts on public health, safety, and welfare.

Historic Resources.

While the Planning Commission included impacts to the adjacent historic property in their evidence for not being able to make Use Permit Finding 6, the Secretary of the Interior Standards for Historic Preservation do not have any standards related to small wireless facilities in the public right-of-way. The only references to structures in the public right-of-way are in the 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. The applicant proposes to replace a PG&E utility pole that is in front of the adjacent historic property. It is not uncommon for PG&E to replace utility poles and add equipment of similar volume to utility poles in front of historic homes. The proposed small wireless facility will not have an adverse impact on the adjacent historic property.

No Visual Impact/Intrusion

Required Finding 1 for Type I to IV Applications states, "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 Section 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines". In other words, the City must be able to find that the project will not have adverse visual or property value impacts. As outlined in this staff report and the attached draft Resolution (Attachment 1), the findings for special exceptions cannot be made. This means the city cannot find that the project will have no adverse visual or property value impacts and therefore should deny the appeal.

Required Findings

As demonstrated in the draft resolution (Attachment 1), findings for approval of the project cannot be made in this case. The discussion below provides a summary. As such, refer to Attachment 1 for additional detail.

Use Permit.

Based on the evidence contained in the record, approval of the project would conflict with the General Plan, not comply with zoning standards, not compatible with surrounding land uses. The project does not meet the design guidelines and approval of the special exceptions cannot be supported resulting in conflict with the requirements of a wireless facility.

Design Review.

Based on the evidence contained in the record, approval of the project would conflict with the General Plan, Local Coastal Program, CMC, design guidelines and neighborhood character, and exceptions to zoning standards. The project does not meet the design guidelines and approval of the special exceptions cannot be supported resulting in conflict with the requirements of a wireless facility.

Coastal Development Permit.

Based on the evidence contained in the record, approval of the project would conflict with the General Plan, not comply with the Local Coastal Program. The project does not meet the design guidelines and approval of the special exceptions cannot be supported resulting in conflict with the requirements of a wireless facility.

Wireless Type I-IV.

Based on the evidence contained in the record, approval of the project would conflict with the General Plan, not comply with zoning standards and findings for approval of a Use Permit, Design Review, and Coastal Development Permit cannot be made in this case. The project does not meet the design guidelines and approval of the special exceptions cannot be supported resulting in conflict with the requirements of a wireless facility.

Special Exception Findings.

The applicant has requested two special exceptions as its proposed facility does not comply with two location standards set forth in CMC Section 17.46.050.E; specifically CMC Section 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 CMC Section 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 approval of the requested exceptions, the denial of the application must result in an effective prohibition under Federal law, or a finding that the denial will violate State law. For the reasons discussed above and in the proposed resolution, staff recommends denial. The City Council 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.

Environmental Review – Denial of the Project:

If the City Council finds that the project cannot be approved, as proposed and conditioned, staff recommends that pursuant to CEQA regulations, the Application is found 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] See *MetroPCS, Inc. v. City and Cnty. of San Francisco*, 400 F.3d 715, 732-34 (9th Cir. 2005)

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

[3] *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).

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

[5] *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).

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

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

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

[9] *Id.*

[10] *Id.*

[11] *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).

FISCAL IMPACT:

N/A

PRIOR CITY COUNCIL ACTION:

N/A

ATTACHMENTS:

1. Attachment 1- Resolution 2026-014 deny_Final
2. Attachment 2 - Appeal Form_Verizon Sequoia Deployment
3. Attachment 3 - Project Plans
4. Attachment 4 - PierCon RF Supplement #4
5. Attachment 5 - CTC Golden Bough Analysis
6. Attachment 6 - CTC Review of PierCon Sup Report 4
7. Attachment 7 - Resolution 2026-002-PC
8. Attachment 8 - Verizon Wireless Letter
9. Attachment 9 - Verizon Wireless Responses to Comments Volume 3
10. Attachment 10 - Previous Reports, Attachments, & Reference Materials
11. Attachment 11 - Confirmation of Interest Golden Bough Playhouse

**CITY OF CARMEL-BY-THE-SEA
CITY COUNCIL**

RESOLUTION NO. 2026-014

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CARMEL-BY-THE-SEA FINDING (1) THE ACTION ON THE APPEAL OF THE PLANNING COMMISSION DECISION STATUTORILY EXEMPT FROM ENVIRONMENTAL REVIEW PURSUANT TO CEQA GUIDELINES SECTION 15270(a); (2) DENYING THE APPEAL BY SEQUOIA DEPLOYMENT SERVICES, ON BEHALF OF VERIZON, OF THE FEBRUARY 10, 2026, PLANNING COMMISSION DECISION (RESOLUTION NO. 2026-002-PC) TO DENY THE SEQUOIA DEVELOPMENT/VERIZON USE PERMIT, DESIGN REVIEW, AND COASTAL DEVELOPMENT PERMIT; AND (3) 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 LOCATED IN THE PUBLIC RIGHT-OF-WAY IN FRONT OF CARMELO STREET 4 SOUTHEAST OF 10TH AVENUE IN THE SINGLE-FAMILY RESIDENTIAL (R-1) DISTRICT

WHEREAS, on October 15, 2025, 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]"), as described herein and including all materials, documents and reports on file with the Community Planning and Building Department ("Application"); and

WHEREAS, the Applicant proposes 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 ("Project"); and

WHEREAS, the installation of Small Wireless Facilities on replacement poles requires approval of a Type III Conditional Use Permit, Design Review, and 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, the Planning Commission adopted Resolution No. 2026-002-PC, denying the Sequoia Development/Verizon Use Permit, Design Review, and Coastal Development Permit, without prejudice, and is incorporated by reference; and

WHEREAS, on February 13, 2026, a timely appeal was filed with the City Clerk (APP 26046) by the Applicant, requesting reconsideration by the City Council of the Planning Commission's denial of the Application; and

WHEREAS, notice of the public hearing was published on February 20, 2026, in the Carmel Pine Cone in compliance with State law (California Government Code 65091), and mailed to owners of real property within a 300-foot radius of the project indicating the date and time of the public hearing

WHEREAS, on or before February 20, 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 March 2, 2026, the City Council held a de novo hearing to consider the appeal and Application; and

WHEREAS, on March 2, 2026, the City Council held a duly noticed public hearing to receive public testimony regarding the appeal, including without limitation, information provided to the City Council 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 City Council at the hearing date, including, without limitation, the staff report and attachments submitted by the Community Planning and Building Department; and

WHEREAS, the City Council did hear and consider all said reports, recommendations, and testimony herein above set forth and used their independent judgment to evaluate the project.

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

1. The facts set forth in the recitals above are true and correct and are incorporated herein by reference.
2. Denial of the appeal and denial 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 statutorily Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15270(a) of the CEQA Guidelines – Project which are disapproved, which states that CEQA does not apply to projects which a public agency rejects or disapproves.
3. The appeal of the Planning Commission decision has been processed in accordance with CMC Section 17.46.070.E.
4. As explained in Sections 1-5 below, all required findings must be met in order to approve the project. Use Permit Finding Nos. 1, 2 and 6 cannot be made. Design Review Finding Nos. 1-6 and 8 cannot be made. Coastal Development Permit Finding No. 1 cannot be made. Type I-IV Wireless Facility Finding Nos. 1-2 and 7-9 cannot be made. Special Exception Finding Nos. 1-3 cannot be made.
5. The City Council has considered the Sequoia Development/Verizon application and its appeal of the Planning Commission's denial at a public hearing and finds based on the evidence in the record that the required findings for approval of the Use Permit, Design Review, and Coastal Development Permit cannot be made (see Sections 1-5 below).

Section 1: FINDINGS, EVIDENCE AND DETERMINATION REQUIRED FOR USE PERMIT (CMC Section 17.64.010.A). *Pursuant to Carmel-by-the-Sea regulations, all findings below must be met in order to approve a Use Permit application.*

1. Finding: The proposed use will not conflict with the City's General Plan.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 2, 3, 4, and 5, this finding cannot be made.
2. Finding: That the proposed use will not comply with all zoning standards applicable to the use and zoning district.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 2, 3, 4, and 5, this finding cannot be made.
3. Finding: 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.
 - a. Determination and Evidence: This resolution includes the denial of the Sequoia Development/Verizon Use Permit. Therefore, this finding does not apply.
4. Finding: 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.

- a. Determination and Evidence: The project includes installing a small wireless facility on a replacement PG&E pole within the right of way. The facility would be unmanned and therefore would not require water supply, wastewater conveyance, communication facilities or police or fire protection. Energy supply to operate the facility would be minimal. This finding is met.
5. Finding: That the proposed use will not be injurious to public health, safety, or welfare.
 - a. Determination and Evidence: The project includes installing a small wireless facility on a replacement PG&E pole within approximately the same location. Although the utility pole would increase in height, it would be well below Federal Aviation Administration safety thresholds. Installation of the replacement utility pole and the wireless facility components would be required to meet PG&E Greenbook standards. In addition, issuance of a building permit would be required to ensure public health and safety. This finding is met.
 6. Finding: 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.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 2, 3, 4, and 5, this finding cannot be made.
 7. Finding: That the proposed use will not generate adverse impacts affecting the health, safety, or welfare of neighboring properties or uses.
 - a. Determination and Evidence: See Finding No. 5 and supporting evidence of this section. This finding is met.

Section 2: FINDINGS EVIDENCE AND DETERMINATION REQUIRED FOR DESIGN REVIEW (CMC Section 17.58.060). *Pursuant to Carmel-by-the-Sea regulations, all findings below must be met in order to approve a Design Review application.*

1. Finding: The project conforms to the applicable policies of the General Plan and the Local Coastal Program.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 1, 3, 4, and 5, the project does not conform to the Carmel-by-the-Sea General Plan and Local Coastal Program. This finding cannot be made.
2. Finding: The project complies with all applicable provisions of this code.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 1, 3, 4, and 5, the project does not conform to the Carmel-by-the-Sea General Plan and Local Coastal Program. This finding cannot be made.
3. Finding: The project is consistent with applicable adopted design review guidelines.
 - a. Determination and Evidence: Section II.C.2 of the administrative guidelines limits the cumulative size of accessory equipment (including shrouds, cabinets or other stealth or concealment devices to 17 cubic feet. The project plans illustrate that the total volume of the accessory equipment is 16.43 cubic feet. However, this measurement does not include

the brackets or gap between the pole and the equipment, which would result in an excess of 17 cubic feet. This finding cannot be made.

4. Finding: The project conforms with all zoning standards applicable to the site, or has received appropriate use permits, variances or exceptions consistent with the Zoning Ordinance.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 1, 3, 4, and 5, the project does not conform to the applicable zoning standards for a wireless facility in the right-of-way. This finding cannot be made.
5. Finding: The project contributes to neighborhood character including the type of forest resources present, the character of the street, the response to local topography and the treatment of open space resources such as setbacks and landscaping.
 - a. Determination and Evidence: As demonstrated in Section 5, the project is located within an area identified as a Highly Incompatible Location for which approval of the required exceptions cannot be made. Therefore, this finding cannot be made.
6. Finding: The project is compatible with, and sensitive to, the natural features and built environment of the site and of the surrounding area. The project respects the constraints of the site and avoids excessive grading, cuts and fills. Construction on steep slopes is minimized to the extent feasible and abrupt changes in grade is minimized or mitigated.
 - a. Determination and Evidence: As demonstrated in Section 5, the project is located within an area identified as a Highly Incompatible Location for which approval of the required exceptions cannot be made. Therefore, this finding cannot be made.
7. Finding: The project maintains the City's principles of modesty and simplicity and preserves the City's tradition of simple homes set amidst a forest landscape. The project uses simple building forms and simple roof forms without complexity that would attract undue attention to the site.
 - a. Determination and Evidence: The proposed project is for a wireless facility located on a replacement PG&E pole and therefore this finding does not apply.
8. Finding: The project does not present excess visual mass or bulk to public view or to adjoining properties. The project relates to a human scale in form, elements and in the detailing of doors, windows, roofs and walkways.
 - a. Determination and Evidence: As demonstrated in Section 5, the project is located within an area identified as a Highly Incompatible Location for which approval of the required special exceptions cannot be made. Therefore, this finding cannot be made.
9. Finding: Project details and materials (e.g., windows, doors, chimneys, roofs, and stonework) are fully integrated and consistent throughout the design. Building materials are used in a manner that is visually consistent with the proposed architecture. All fenestration is appropriate in size and consistent with a human scale.
 - a. Determination and Evidence: The proposed project is for a wireless facility located on a replacement PG&E pole and therefore this finding does not apply.

10. Finding: The project is consistent with the City's design objectives for protection and enhancement of the urbanized forest and open space resources. Open space is distributed around buildings to provide visual relief from structural bulk and a distinct separation from buildings on adjacent sites.
 - a. Determination and Evidence: The proposed project is for a wireless facility located on a replacement PG&E pole and therefore this finding does not apply.

Section 3: FINDINGS EVIDENCE AND DETERMINATION REQUIRED FOR COASTAL DEVELOPMENT PERMIT (CMC Section 17.64.010.B). *Pursuant to Carmel-by-the-Sea regulations, all findings below must be met in order to approve a Coastal Development Permit application.*

1. Finding: 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.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Sections 1, 2, 4, and 5, the project does not conform to the Carmel-by-the-Sea Local Coastal Program. This finding cannot be made.
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).
 - a. Determination and Evidence: The subject property is located within the right-of-way of Carmelo Street which is not between the first public road and the sea. Therefore, this finding does not apply.

Section 4: FINDINGS EVIDENCE AND DETERMINATION REQUIRED FOR TYPE I-IV APPLICATIONS (CMC Section 17.46.080.A). *Pursuant to Carmel-by-the-Sea regulations, all findings below must be met in order to approve a wireless facility application.*

1. Finding: The proposed wireless facility will result in adverse visual impacts or have an adverse impact on property values because it does not fully comply with all applicable development standards in CMC § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines.
 - a. Determination and Evidence: The proposed application requires two exceptions to meet all applicable design guidelines and standards. As demonstrated in the findings and supporting evidence contained in Section 5, the required findings for special exceptions are not supported. Therefore, this finding cannot be made.
2. Finding: 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.

- a. Determination and Evidence: The applicant applied for two special exceptions and the applicant did not meet its burden to be granted the two special exceptions, as demonstrated in the findings and supporting evidence contained in Section 5. This finding cannot be made.
3. Finding: 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.
 - a. Determination and Evidence: 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. This finding is met.
4. Finding: The proposed wireless facility will comply with all applicable fire safety and public safety standards.
 - a. Determination and Evidence: The applicant meets all applicable City's standards in CMC Chapter 17.46 and the administrative guidelines related to fire safety and public safety. The project plans illustrate a disconnect switch for power integrated into the PG&E smart meter. The applicant provided a detail for the required RF warning signage below the antenna. The equipment would be grounded according to the project plans. The Building Division would review the construction plans to confirm that they comply with the California Public Utilities Commission (CPUC) General Order (GO) 95. Also see Findings 5 and 7 and supporting evidence of Section 1 and Finding 3 and supporting evidence of this section, demonstrating that the project would meet all required fire and public safety standards. Therefore, this finding is met.
5. Finding: The proposed wireless facility will comply with fall zone requirements in the Administrative Detailed Wireless Facility Design Guidelines.
 - a. Determination and Evidence: Fall protection is a guideline for towers on parcels only. The applicant is not proposing to install or attach its facility to a tower on a parcel and there are no fall zone requirements in the Administrative Wireless Facility Design Guidelines applicable to wireless facilities in the public right of way. Therefore this finding is not applicable.
6. Finding: All public notices required for the application have been given.
 - a. Determination and Evidence: 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. Application materials have been posted on the City website since October 15, 2025. The applicant and the city have followed appropriate procedures for all noticing requirements ahead of the associated public hearings. Also see the recitals above demonstrating compliance with applicable noticing procedures. This finding is met.
7. Finding: All the findings required for a use permit pursuant to CMC § 17.64.010 can be made.

- a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Section 1, all required use permit findings cannot be made. Therefore, this finding cannot be made.
- 8. Finding: All the findings for discretionary design review approval pursuant to CMC § 17.58.060 can be made.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Section 2, the project does not meet all the findings for Design Review and therefore this finding cannot be made.
- 9. Finding: All the findings required for a Coastal Development Permit can be made.
 - a. Determination and Evidence: As demonstrated in the findings and supporting evidence contained in Section 3, the project does not meet all the findings for a Coastal Development Permit and therefore this finding cannot be made.

Section 5: FINDINGS EVIDENCE AND DETERMINATION REQUIRED FOR SPECIAL EXCEPTIONS FOR FEDERAL OR STATE PREEMPTION OR MINOR DEVIATIONS IN DESIGN - TYPES I-IV ONLY (CMC Section 17.46.080.C).

- 1. Finding: 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.
 - a. Determination and Evidence: The applicant proposed a Small Wireless Facility to be located on a replacement utility pole within a right of way in the Single-Family Residential (R-1) Zoning District and within 5 feet from the centerline of a front façade window of the residence located at Carmelo Street 4 Southeast of 10th Avenue. Pursuant to CMC Section 17.46.040.E, approval of the project requires granting two special exceptions. The proposed wireless facility location requires a special exception due to its Highly Incompatible Location pursuant to CMC Section 17.46.040.E.1.a (public right-of-way within the single-family residential zoning district). The proposed wireless facility location requires a special exception due to its Highly Incompatible Location pursuant to CMC Section 17.46.040.E.2.a (existing structures directly in front of areas five feet in either direction from the centerline of a front façade window of any occupied residential building). In its application, the applicant claimed that denial of the application will result in an effective prohibition in violation of Federal law and it will violate State law. For the reasons discussed further below, the applicant has not met its burden on either its federal law claim or its state law claim. Therefore, the special exceptions cannot be granted.
 - b. Determination and Evidence: Effective Prohibition or Otherwise Violate Federal Law. For the reasons discussed below, the applicant has not demonstrated that the denial of the application will result in an effective prohibition or violate Federal law and therefore this finding cannot be made on this basis. To support its effective prohibition claim, the applicant submitted evidence and made 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.

- i. **Significant Gap/Least Intrusive Means.** To meet this standard, the applicant must show that there is a significant gap in its personal wireless service and that considering technically feasible and available alternatives, it has proposed the least intrusive means of filling the gap, meaning the facility that is least intrusive to the values in the city's regulations. The applicant has not met this standard.
 1. Concerning the gap, in its application, the applicant provided technical reports and drive test data to show that there is a gap in quality wireless service affecting a significant portion of the city. The city-contracted engineering consultant, CTC Telecommunication Network Consulting, provided a report titled "Review of the Application of Verizon Wireless to Install a New Small Wireless Facility." The report concluded that there is credible evidence of a coverage gap due to high traffic in the 700/850 MHz bands and signal interference and that the site will comply with radio frequency emission standards. Based on the technical evidence, there is a significant gap in the applicant's personal wireless service.
 2. Concerning the least intrusive means, the applicant provided technical reports, alternatives analysis and other evidence that it claimed demonstrated that its proposed small wireless facility on the replacement utility pole on Carmelo is the least intrusive means to address Verizon's alleged coverage gap. The applicant's alternatives analysis only considered various utility poles in the public rights of way. It did not fully evaluate the alternative of placing a facility on the roof at the Golden Bough because its initial technical analysis determined a small wireless facility was not technically feasible at that location. In response to comments made by the public and Planning Commissioners and evidence that the Golden Bough management was interested negotiating a lease for a roof-top wireless facility, the applicant provided additional technical analysis. This was a report titled "Radio Frequency Supplemental Report #2", prepared by PierCon Solutions, LLC, dated January 30, 2026, which included the following statement: "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 report concludes that 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 found 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, it did identify a potential technical solution that would work at Golden Bough. On February 6, 2026, the city-contracted engineering consultant, CTC Telecommunication Network Consulting, provided a report titled Review of Supplemental Report which analyzed the PierCon Supplemental Report #2 and responded to feedback received from residents. The CTC report explained that their previous report reviewed Verizon's proposed small wireless facility design for the

Golden Bough Theater, agreeing with Verizon that a small wireless facility on the Golden Bough Theater would not sufficiently address Verizon's coverage deficiencies. The report then analyzed the macro design for the Golden Bough Theater that was shown the PierCon Supplemental Report #2, concluding that the macro design would address Verizon's coverage gap. On February 10, 2026, the Applicant submitted "Radio Frequency Supplemental Report #3", prepared by PierCon Solutions, LLC, dated February 9, 2026, which offered additional reasons why Golden Bough would not work. The report stated that the Golden Bough Theater does not fit into the small wireless facility deployment architecture that Verizon intended for serving the alleged coverage gap, and that the macro design would have near field vegetation obstructing the southwest antenna and the northwest antenna would have extended line-of-sight propagation causing unintended inter-cell interference. On February 23, 2026, the applicant submitted "Radio Frequency Supplemental Report #4", prepared by PierCon Solutions, LLC, dated February 23, 2026. The report provides further evidence that the Golden Bough Theater is not a technically viable alternative location, stating, "the Golden Bough location does not maintain continuous positive uplink margin across the documented service gap area. Low-downtilt configurations result in extended projection beyond the intended residential area while failing to remediate the central deficiency zone. Increased downtilt reduces projection but constrains uplink margin within the service gap area and leaves portions of the southern service area below threshold." The report further concludes, "modeling further reflects configuration sensitivity and geometric limitations inherent to the rooftop's position outside the service gap area. These constraints are not attributable to tunable parameters but to spatial separation and physical site conditions, including near-field vegetation." The report concludes that the Golden Bough Theater is not a technically feasible alternative macro site. Additionally, on February 24, 2026, the applicant submitted a third volume of responses to questions and issues raised in public comments and prior hearings. In the responses, the applicant admitted the wireless facility may be "technically constructable at Golden Bough" but said "it would not meet [] Verizon Wireless's needs." Two further reports from city-contracted technical consultant CTC challenged the applicant's new arguments and technical conclusions. One CTC report titled "Feasibility Review for Alternate Location Verizon Wireless Facility at the Golden Bough Playhouse" provided an overview of the Golden Bough Theater and a potential macro design for the site. The report includes modelling of 2150 and 3700 MHz band coverage with the macro design that shows a macro facility at Golden Bough would potentially cover almost the entire gap area with reliable in-building coverage. The report recognizes that "it will still be necessary to determine the true impact of the nearby trees and foliage on the west side of the Playhouse to the mid-band signal propagation from the proposed antenna location." CTC concludes the report saying a temporary antenna on the Golden Bough Theater could simulate the macro site to see how the foliage will effect signal propagation and notes that the city is willing to work with the Golden Bough to trim trees. The report also evaluates RF emissions and concludes the site would

be compliant with FCC RF emissions exposure guidelines. CTC also provided a report titled Response to PierCon Solutions – Radio Frequency Supplemental Report # 4. The report observes that there unexplained shift in the area of the alleged coverage gap area presented by PierCon on behalf of Verizon between their first report and Supplemental Report #4. CTC observes the applicant's gap based on actual field measurements included the area surrounding Golden Bough, but in the latest PierCon report, Golden Bough is no longer in the gap area. The report also notes that the initial PierCon information showed that Verizon employs minimum beam tilt for its antennas at existing sites in the Carmel area to provide greater coverage rather than using beam tilt to suppress coverage to minimize interference. The report also observes that only in this most recent report did PierCon introduce uplink data as a technical measure. The field test data and prior reports, as well as CTC's analysis dealt with download measurements only, which is the most common measurements used for network design. The report concludes that CTC could model the uplink signal power at a 5 degree downtilt if Verizon provides a printout of their model of uplink signal power at a 5 degree downtilt. Based on the above, in conclusion, we find that while some evidence provided suggests that the Golden Bough Theater is not a technically feasible location, there appears to be alternative antenna configurations, downtilt, and tree remediation to make the site technically feasible. As further bases for rejecting the Golden Bough as the least intrusive alternative, in its February 24, 2026 third volume of responses, the applicant questioned whether Golden Bough owner would even lease its property to Verizon, claimed the cost would be higher than its preferred alternative, and that a facility at Golden Bough would have greater historical resource impacts. These arguments are also not convincing. The evidence in the record shows that as recent as February 25, 2026, the Golden Bough representative confirmed to the city by email that it remains willing to negotiate a lease. Verizon has chosen to incur the cost to place macro facilities on roof-tops within Carmel. Further, according to staff's analysis the Golden Bough would only require one special exception, for height, and therefore is more compatible with CMC Chapter 17.46. The need for historic review does not make the Golden Bough location more intrusive; there is no evidence that a properly designed installation could not meet the city's historic review requirements. For all of these reasons, we find the applicant has not met its burden to demonstrate that its proposed facility will be the least intrusive means for addressing the coverage gap because the Golden Bough is a technically feasible, less intrusive, and available alternative.

- ii. **Materially Inhibits Standard.** To meet this standard, the applicant must show that the denial of its application would materially inhibit the applicant's ability to compete in a fair and balanced legal and regulatory environment considering the totality of the circumstances such as insufficiency of coverage, a lack of available alternatives, unreasonable costs imposed on the applicant and unreasonable delay in making the decision. The applicant has not met this standard for the following reasons. As discussed above, there is an available alternative at Golden Bough. The applicant's attorney argues in the letter dated

February 24, 2026 that it would have to spend many times more if it had to “relocate” to Golden Bough than to be on its preferred location on a utility pole in the right of way. However, the argument creates a false comparison because it assumes Verizon has the unfettered right to place facilities in the right of way, and that is not correct. As the California Supreme Court has held, the telephone franchise allowing the applicant rent-free use of the right of way under Pub. Util. Code 7901 “is not absolute” but rather it is a “limited right to use the highways ... only to the extent necessary for the furnishing of services to the public.” *T-Mobile W. LLC v. City & Cnty. of San Francisco*, 6 Cal. 5th 1107, 1121 (2019). Where there is a viable option to furnish services from sites outside of the right of way, right of way use is not necessary. Additionally, it is common knowledge that the applicant has placed facilities on parcels that require payment of rent and incur other costs elsewhere in Carmel and beyond. Doing so in this instance would be nothing unusual or extraordinary. The applicant’s argument regarding delay is also unconvincing. Verizon claims to have spent the time since the city adopted the new wireless ordinance studying the complex requirements before submitting its application. However, another plausible explanation for Verizon’s delay in submitting its application is that it was waiting for the opportunity to try to convince the California Coastal Commission that provisions of the ordinance it did not like should be changed. Only once that attempt failed, did Verizon submit an application. Further, all applications for wireless facilities are subject to FCC shot clocks. An application for a facility on Golden Bough would be a colocation with a 90 day shot clock for action, the same time period as the small cell on a replacement pole the applicant did request.

- c. Determination and Evidence: Denial as Violation of State law. For the reasons discussed below, the applicant has not demonstrated that the denial of the application would violate state law. The applicant claims denial would violate its franchise to use the public rights of way granted by Pub. Util. Code Section 7901. However, as noted above, the California Supreme Court has held that telephone corporations’ right to construct telephone lines in public rights-of-way “is not absolute” but rather it is a “limited right to use the highways ... only to the extent necessary for the furnishing of services to the public.” The decision also recognizes that cities retain broad authority to consider aesthetics under Section 7901. Carmel’s rationale for the city’s preference for placements outside public rights-of-way, particularly in residential areas is grounded in valid right-of-way management concerns, particularly tied to the city’s unique character and resources, which include narrow, tree-lined streets and extraordinary coastal vistas. Specifying areas for heightened review due to particular attributes of the area does not, on its face, conflict with Section 7901, as it is consistent with the City’s authority under Section 7901 to ensure placements do not “incommode” the public use.
2. Finding: The special exception requested by the applicant does not compromise or excuse compliance with any fire safety or other public health and safety requirements.
 - a. Determination and Evidence: See Finding 5 and supporting evidence contained Section 1. This finding is met.
3. Finding: 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.

- a. Determination and Evidence: See Finding 1 and supporting evidence above and the findings and supporting evidence contained in Sections 1-4. This finding cannot be made.

Section 6: Tolling of Statute of Limitations.

1. The City Administrator (or Acting City Administrator) is authorized to enter into an agreement with the Applicant to toll the statute of limitations for the Applicant to file a court action to challenge this Resolution in order to provide the Applicant an opportunity to submit and process with the City an application to install cell equipment at the Golden Bough.

Section 7: Decision

All findings required to approve the project cannot be made in this case and the City Council of the City of Carmel-by-the-Sea decides as follows:

- 1) Finding the action on the appeal of the Planning Commission and denial of the Sequoia Development/Verizon application is statutorily exempt from environmental review pursuant to CEQA Guidelines Section 15270(a); and
- 2) Denying the appeal by Sequoia Development/Verizon of the February 10, 2026, Planning Commission decision (resolution no. 2026-002-pc) to deny the Sequoia Development/Verizon Use Permit, Design Review, and Coastal Development Permit; and
- 3) Denies 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 located in the public right-of-way in front of Carmelo Street 4 Southeast of 10th Avenue in the Single-Family Residential (R-1) district.

PASSED AND ADOPTED BY THE CITY COUNCIL OF THE CITY OF CARMEL-BY-THE-SEA this 2nd day of March 2026, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

APPROVED:

ATTEST:

Dale Bryne, Mayor

Nova Romero, MMC, City Clerk



CITY OF CARMEL-BY-THE-SEA APPEAL FORM

Appeals to a Board or Commission must be made by completing and submitting an Appeal Form with the City Clerk. Appeals shall be filed **within 10 calendar days following the date of action** and paying the required filing fee as established by City Council resolution.

Appeals to the City Council must be made by completing and submitting an Appeal Form with the City Clerk. Appeals shall be filed **within 10 working days following the date of action** and paying the required filing fee as established by City Council resolution.

Verizon Wireless

Name of Appellant

[REDACTED]

Mailing Address of Appellant

[REDACTED]

Phone Number

Email address

Send correspondence to the following party (if different than Appellant):

Sequoia Deployment Services, Inc., Pete Shubin

Name

[REDACTED]

Mailing Address

[REDACTED]

Phone Number

Email address

Planning Commission

Commission, Board, Official or Department whose action is being appealed

Physical location of property involved (street location or address): IFO Carmelo St. 4 SE of 10th Ave.

N/A - Public ROW N/A - Public ROW N/A - Public ROW

Lot

Block

APN

Date of decision being appealed: February 10, 2026

Specific action or decision being appealed: Denial of applications:

DR 25313 & UP 25314 (Verizon Sequoia Deployment)

Grounds for appeal (attach additional pages if necessary):

Please see the attached "Verizon Wireless Grounds for Appeal".

Pete Shubin

[REDACTED]

Signature of Appellant

**Verizon Wireless Grounds for Appeal
Planning Commission Denial of Applications DR 25313 and UP 25314
for Use Permit, Design Review, and Coastal Development Permit
for Small Wireless Facility, Carmelo Street, City of Carmel-by-the-Sea**

Verizon Wireless appeals the Planning Commission's decision on February 10, 2026, to deny these applications on the grounds that the denial violated federal and state telecommunications law, including the federal Telecommunications Act of 1996, Federal Communications Commission regulations, and California Public Utilities Code Section 7901. Further, the denial was not supported by the City of Carmel-by-the-Sea Municipal Code, General Plan, or *Administrative Detailed Wireless Facility Design Guidelines*.

Specifically, the decision was not supported by substantial evidence, in violation of 47 U.S.C. Section 332(c)(7)(B)(iii). The Associate Planner's *Notice of Decision* dated February 11, 2026, and amended on February 13, 2026, generally recited Municipal Code findings or standards, but provided little or no explanation of why the proposed facility would not comply. The *Notice of Decision* focused on the City's desired alternative location on private property, the Golden Bough Playhouse, without providing substantial evidence to rebut Verizon Wireless's evidence and expert testimony that the playhouse is not a feasible alternative to fill a significant gap in service. In contrast, Verizon Wireless provided ample evidence to confirm that the proposed facility complies with all City regulations, including the findings to grant special exceptions.

Because a facility at the Golden Bough Playhouse would require a different design than the proposed small wireless facility, denial based on a preference for the playhouse would violate federal telecommunications law by dictating the technology Verizon Wireless would use to provide service.

According to the federal Telecommunications Act and Federal Communications Commission regulations, denial of the application would constitute a prohibition of service in violation of 47 U.S.C. Section 332(c)(7)(B)(i)(II), because the proposed facility is the least intrusive means to fill a significant gap in Verizon Wireless service. It would also materially inhibit Verizon Wireless's ability to introduce new 5G services, improve existing service, and densify the network.

Denial of the application would also violate California Public Utilities Code Section 7901, which grants telephone corporations a statewide franchise right to place their equipment along any public right-of-way. The Municipal Code's designation of R-1 residential zone rights-of-way as a highly incompatible location and the Planning Commission's denial due to its preference for a facility on private property deprive Verizon Wireless of its rights under Section 7901.

Verizon Wireless requests that the City Council reverse the Planning Commission's denial and approve the applications. Verizon Wireless reserves the right to supplement these grounds for its appeal to the City Council and in any legal challenge it may file in federal or state court.



City of Carmel-by-the-Sea
COMMUNITY PLANNING AND BUILDING DEPARTMENT
POST OFFICE DRAWER CC CARMEL-BY-
THE-SEA, CA 93921
(831) 620-2010 OFFICE

February 11, 2026

Pete Shubin, Sequoia Deployment Services, Inc.

Via Email: pete.shubin@sequoia-ds.com

Via Mail: 1 Spectrum Pointe Dr, Suite 130,
Lake Forest, CA 92630

Subject: Notice of Decision
Applications: DR 25313 & UP 25314 (Verizon Sequoia Deployment)
Subject Site: Public right-of-way in front of Carmelo Street 4 southeast of 10th Avenue

The Planning Commission denied with prejudice Design Review and Use Permit DR 25313 & UP 25314 (Verizon Sequoia Deployment) on February 11, 2026. Staff has enclosed a copy of the final resolution here and sent via DocuSign for the applicant to sign and return for the City's records.

The Planning Commission's denial is subject to a 10-calendar day appeal period ending at 5:00 PM on February 23, 2026. Per Carmel Municipal Code (CMC) Section 17.54.040.C and Section 17.46.070.E.1, Appeals must be filed within 10 calendar day after the Director issues the decision notices pursuant to subsection (D)(1) or (3) of this section. Any interested person may file a written appeal for cause in accordance with the provisions in CMC Section 17.54.040.C.

The reason for denial can be found on the City Website on the current planning page (link below):
<https://ci.carmel.ca.us/post/current-planning-applications>

If you have any questions please do not hesitate to contact me. I can be reached directly at (831) 620-2027 or jolander@ci.carmel.ca.us

Best,

Jacob Olander
Associate Planner

Encl: Resolution 2026-002-PC

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

PLANNING COMMISSION RESOLUTION NO. 2026-002-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 10TH 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 DENIAL (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.

Municipal Code Findings – CMC Section 17.64.010 General Findings Required for All Use Permits	YES	NO
1. The proposed use will not conflict with the City's General Plan.		✓
General Plan conflict: When alternatives exist, the GP prioritizes community character over infrastructures.		
2. That the proposed use will comply with all zoning standards applicable to the use and zoning district.		✓
Zoning non-compliance: requires two special exceptions that cannot be granted.		
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.		✓
Set precedent: approving sites in the highly incompatible R-1 locations invites similar future applications.		
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.		✓
Injurious to safety: Fall zone concern – 50-foot structure only 25 feet from occupied residence, tree root disturbance.		
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.		✓
Incompatible land use: R-1 zone designated highly incompatible; directly fronts historic resource.		
7. That the proposed use will not generate adverse impacts affecting the health, safety, or welfare of neighboring properties or uses.		✓
Adverse neighboring impacts: structural proximity, trench encroachment on drip lines, visual intrusion.		
Municipal Code Findings – CMC Section 17.46.080.A Findings Required for Type 1 to IV Applications		
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 § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines.		✓
Adverse visual impacts: non-compliant with development standards, special exceptions not justified.		
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.		✓
Special exceptions fail: Golden Bough Theater is viable less-intrusive alternative.		
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 § 17.64.010 .		✓
Use permit findings cannot be made (as indicated in the 17.64.010 failures noted in previous findings).		
8. All the findings for discretionary design review approval pursuant to CMC § 17.58.060		✓
• Conform to the applicable policies of the General Plan and the Local Coastal Program		✓
• Comply with all applicable provisions of this code		✓
• Are consistent with applicable adopted design review guidelines		✓
Design review fails: non-conformance with General Plan, LCP, and design guidelines.		
9. If applicable, all the findings required for a coastal development permit.		✓
• 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.		✓
• 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).	N/A	N/A
Coastal development permit fails: inconsistent with highly scenic area designation.		
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)		
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.		✓
No effective prohibition: the applicant failed to eliminate Golden Bough as least-intrusive alternative.		
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.		✓
Not narrowly tailored: two exceptions exceed what's necessary given viable alternative exists.		

Section 2: REASONS FOR DENIAL. THE PLANNING COMMISSION FOUND THAT:

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 failed to show that that the proposed site may be the least intrusive means because a less intrusive option may be technically feasible and potentially available. The Golden Bough Theater may address the coverage gap and may not require any Code exceptions.

The Applicant has failed under the materially inhibits standard because in considering the totality of the circumstances, including the Code's sitting preferences and requirements, another location (such as the Golden Bough Theater) may be technologically, economically feasible, and potentially available. Therefore, the denial will not materially inhibit the carrier's ability to provide personal wireless services.

Further, the Applicant has not shown that denial would violate state law because they have failed to show that the heightened review in the Carmel-by-the-Sea Municipal Code for facilities in the R-1 zone right-of-way violates the applicant's statutory franchise in Public Utility Code 7901 to use of the right-of-way.

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: Allen, Ahlborn, Locke, Karapetkoba, LePage

ABSENT:

ABSTAIN:

APPROVED:

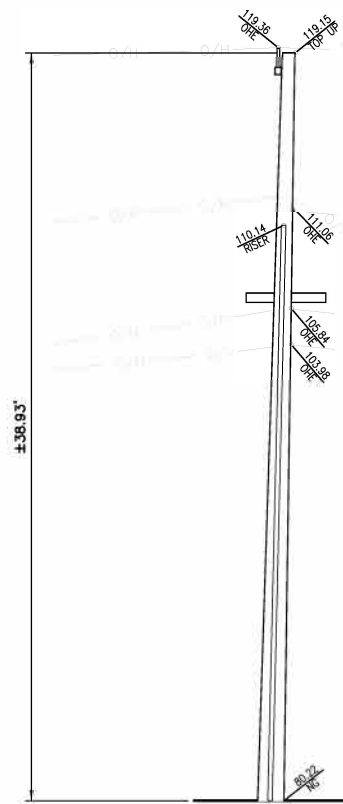
ATTEST:

Michael LePage
Chair

Shelby Gorman
Planning Commission Secretary



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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
	GEODETIC MARKER	SCO	SEWER CLEAN-OUT
	CHAIN LINK FENCE	PS	PARKING STRIPE
	WOOD FENCE	SW	SIDEWALK
	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	OH	OVERHEAD
	UP	PUE	PUBLIC UTILITY EASEMENT
	LP	FC	FACE OF CURB
	LUM	BOL	BOLLARD
	NG	TOP	TOP OF ITEM
		BOT	BOTTOM OF ITEM

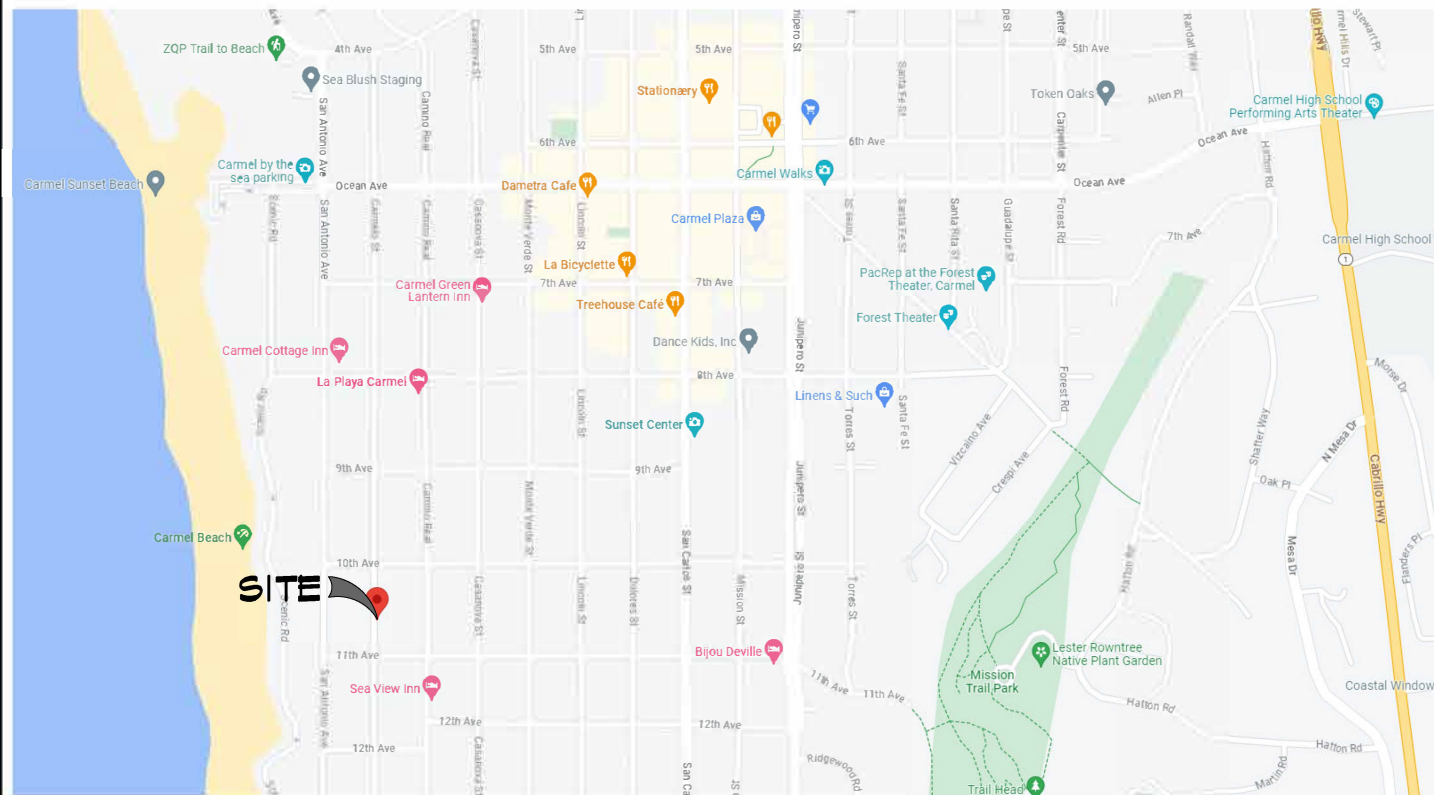
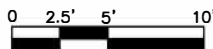
TITLE REPORT
NOT APPLICABLE (RIGHT-OF-WAY)

LEGAL DESCRIPTION
NOT APPLICABLE (RIGHT-OF-WAY)

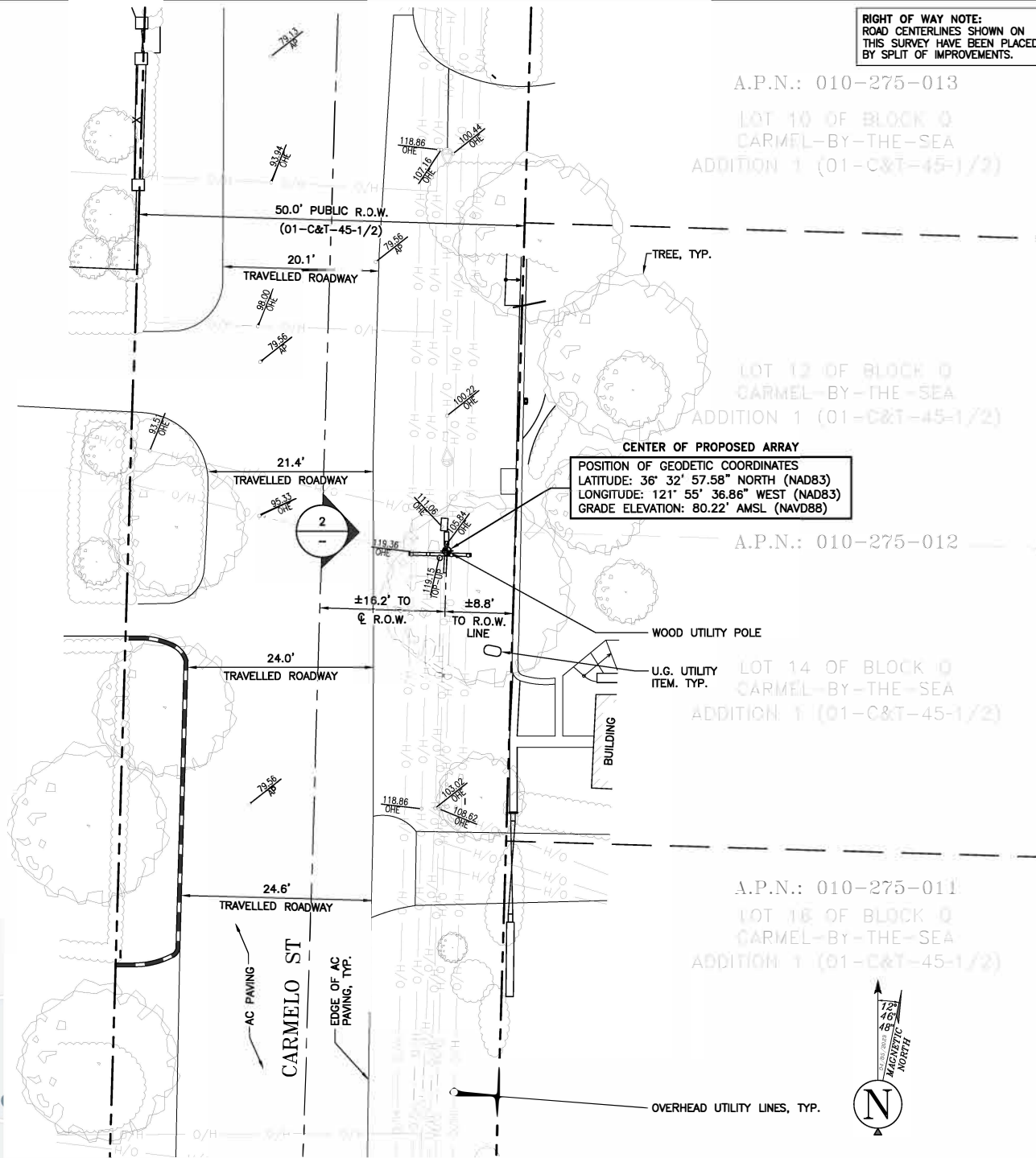
ASSESSOR'S PARCEL NO.
NOT APPLICABLE (RIGHT-OF-WAY)

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.

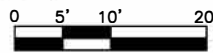
② POLE ELEVATION
1 inch = 5ft.



VICINITY MAP



① POLE LOCATION
1 inch = 10ft.



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/ZALZALU & 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/ZALZALU & ASSOCIATES, INC.
- ANY CHANGES MADE TO THE INFORMATION ON THIS PLAN, WITHOUT THE WRITTEN CONSENT OF ALL STATES ENGINEERING & SURVEYING / ZALZALU & ASSOCIATES, INC. RELIEVES ALL STATES ENGINEERING & SURVEYING/ ZALZALU & ASSOCIATES, INC. OF ANY AND ALL LIABILITY.
- THESE DRAWINGS & SPECIFICATIONS ARE THE PROPERTY & COPYRIGHT OF ALL STATES ENGINEERING & SURVEYING / ZALZALU & 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 CARMELO-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

RIGHT OF WAY NOTE:
ROAD CENTERLINES SHOWN ON
THIS SURVEY HAVE BEEN PLACED
BY SPLIT OF IMPROVEMENTS.

A.P.N.: 010-275-013

LOT 10 OF BLOCK 0
CARMELO-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

LOT 12 OF BLOCK 0
CARMELO-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

A.P.N.: 010-275-012

LOT 14 OF BLOCK 0
CARMELO-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

A.P.N.: 010-275-011

LOT 16 OF BLOCK 0
CARMELO-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

ATTACHMENT 3

verizon

2785 MITCHELL DRIVE, SUITE 9
WALNUT CREEK, CA 94598

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

ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER DRIVE
LAKE FOREST, CA 92630

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

REV	DATE	DESCRIPTION	
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.

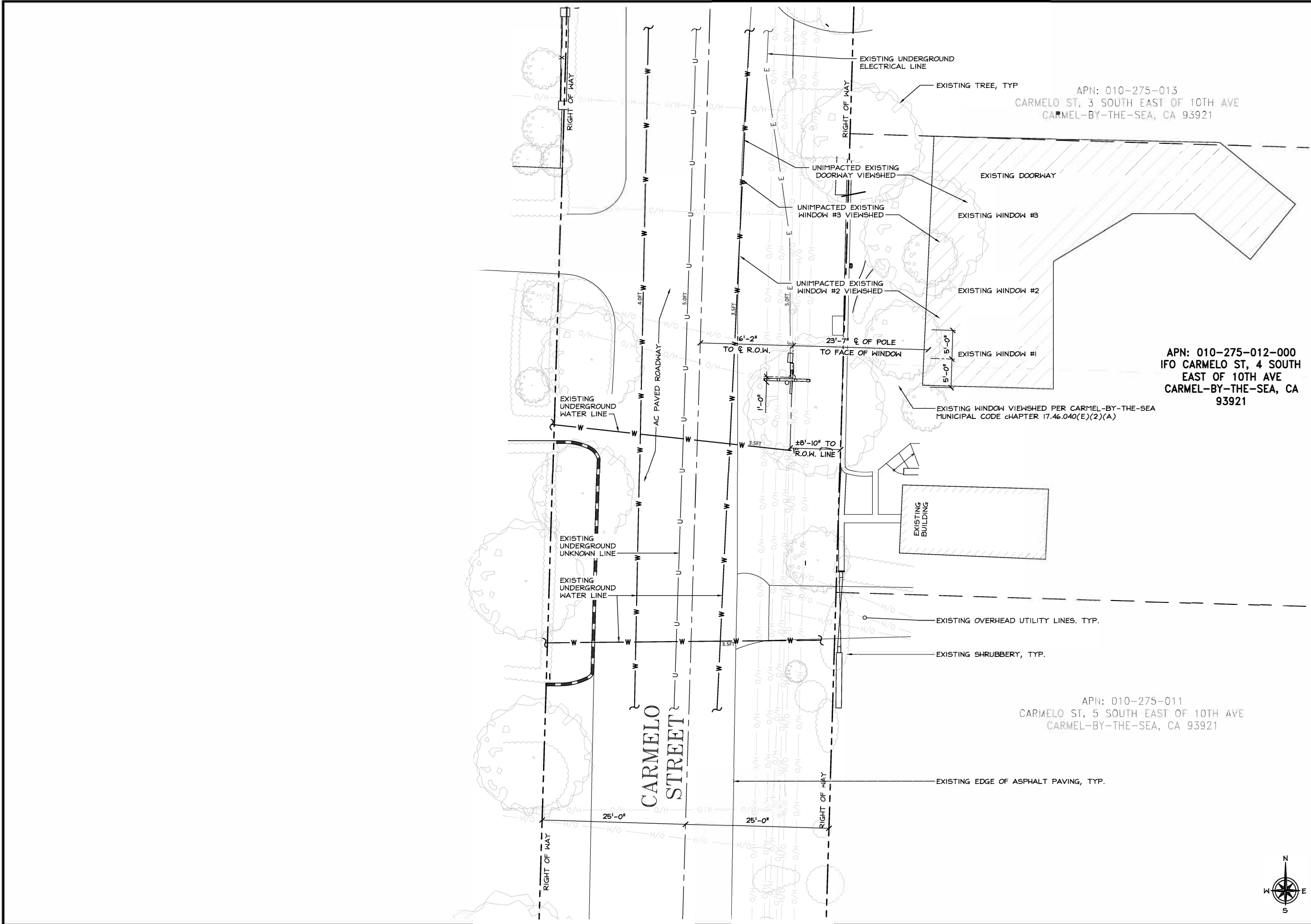
**SOUTH CARMEL OPTION 2
RIGHT-OF-WAY SITE:
CARMELO STREET
CARMELO-BY-THE-SEA, CA 93921
NEW BUILD-SMALL CELL**

SHEET TITLE

SITE SURVEY

SHEET NUMBER

C-1



ATTACHMENT 3

EXISTING PARKING AREA

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94594

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

ALL STATES
ENGINEERING & SURVEYING
23675 BIRCHER 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

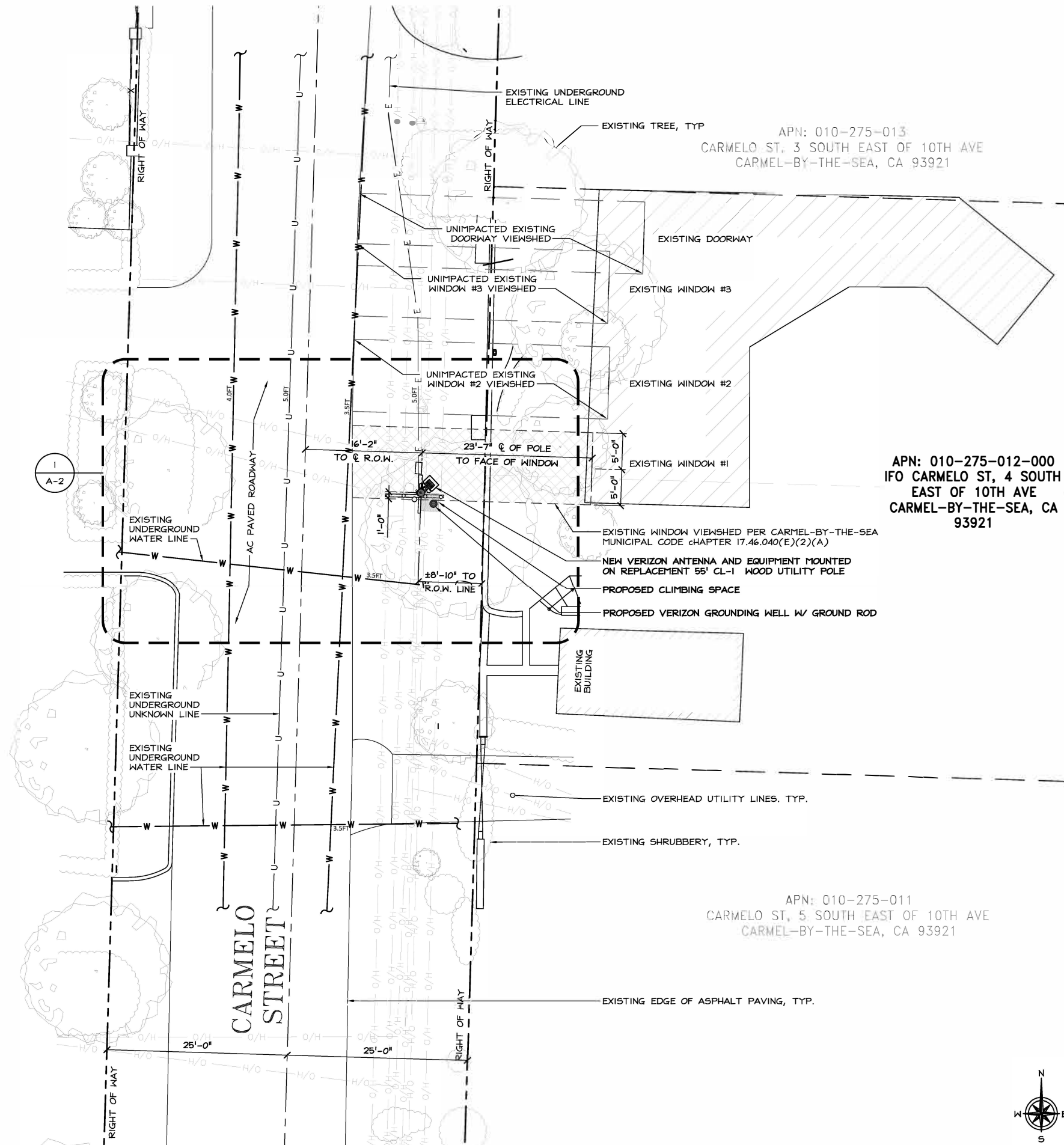
IT IS A VIOLATION OF LAW FOR ANY PERSON,
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DIRECTION OF A LICENSED PROFESSIONAL
ENGINEER, TO ALTER THIS DOCUMENT.

SC001 CARMELO STONEWALL (OPT.2)
SUBJ: 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
SITE PLAN

SHEET NUMBER
A-0

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.

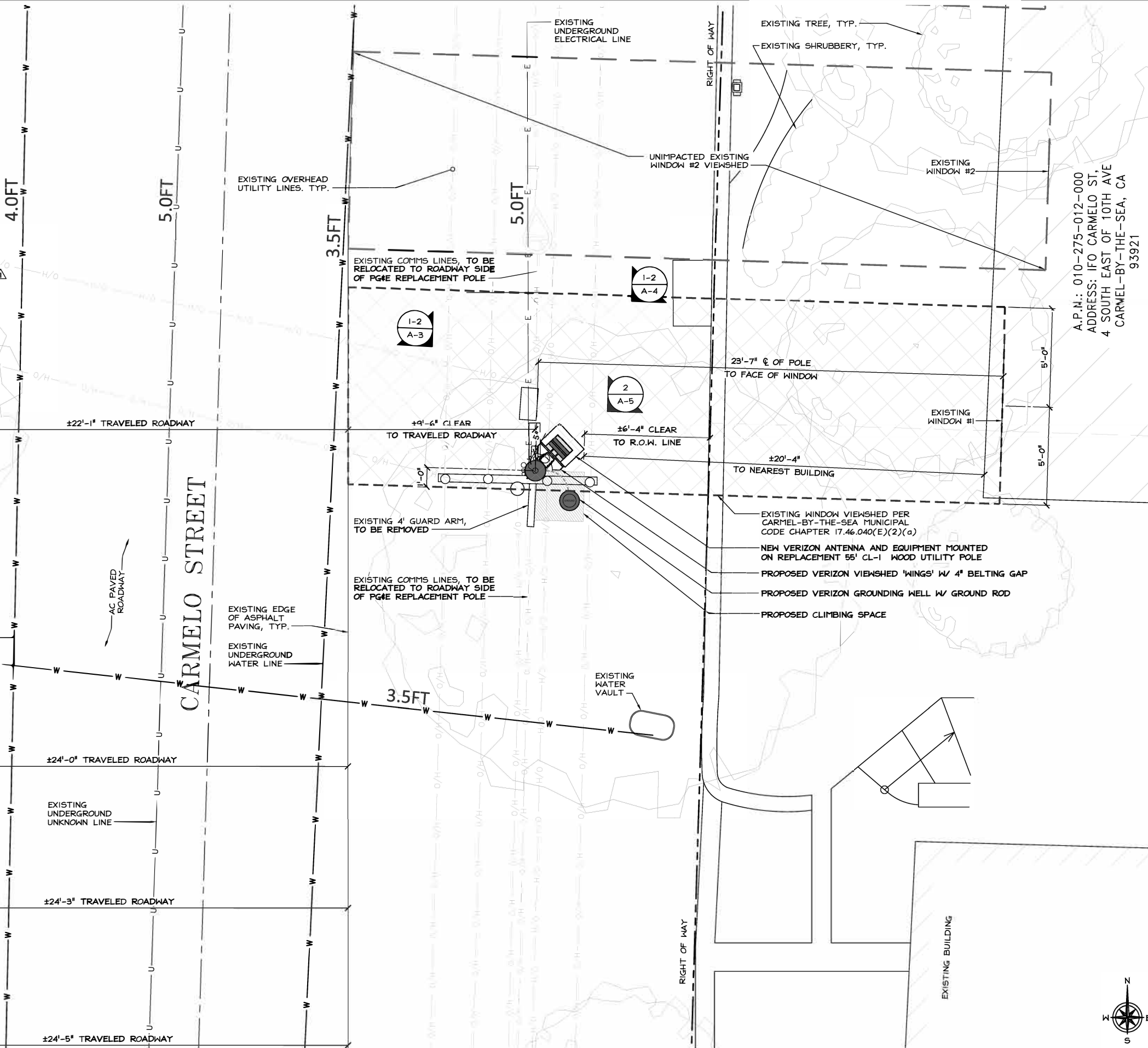


24"x36" SCALE: 1/8" = 1'-0"
11"x17" SCALE: 1/16" = 1'-0"

ATTACHMENT 3		
EXISTING PARKING AREA		
verizon 2770 SHADELANDS DR. BUILDING II WALNUT CREEK, CA 94594		
 SEQUOIA EMPLOYMENT SERVICES, INC. 1 SPECTRUM POINTE DRIVE, SUITE 130 LAKE FOREST, CA 92630-2283		
 ALLSTATES ENGINEERING & SURVEYING 23675 BIRTCHEE DRIVE LAKE FOREST, CA 92630		
PROJECT ID:	TBD	
DRAWN BY:	MA	
CHECKED BY:	DW	
 10/30/2025	100% CD (PCC-1)	NC
4 11/12/2024	100% CD (NEW RFDS)	NC
3 10/21/2024	100% CD's (VIEW-SHED)	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
REV	DATE	DESCRIPTION
  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. ACCEPT IT TO: 150 CARMELO ST., 4 SOUTH EAST OF 10TH AVE CARMEL-BY-THE-SEA, CA 93921 MDG NUMBER: 5000081318		
SHEET TITLE		
 PROPOSED SITE PLAN		
SHEET NUMBER		
A-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.



ATTACHMENT 3

verizon

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94591

SEQUOIA
DEPLOYMENT SERVICES, INC.

1 SPECTRUM POINTE DRIVE, SUITE 130
LAKE FOREST, CA 92630-2283

ALLSTATES
ENGINEERING & SURVEYING

23675 BIRCHER 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	11/2/2024	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)
SUBJECT: 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

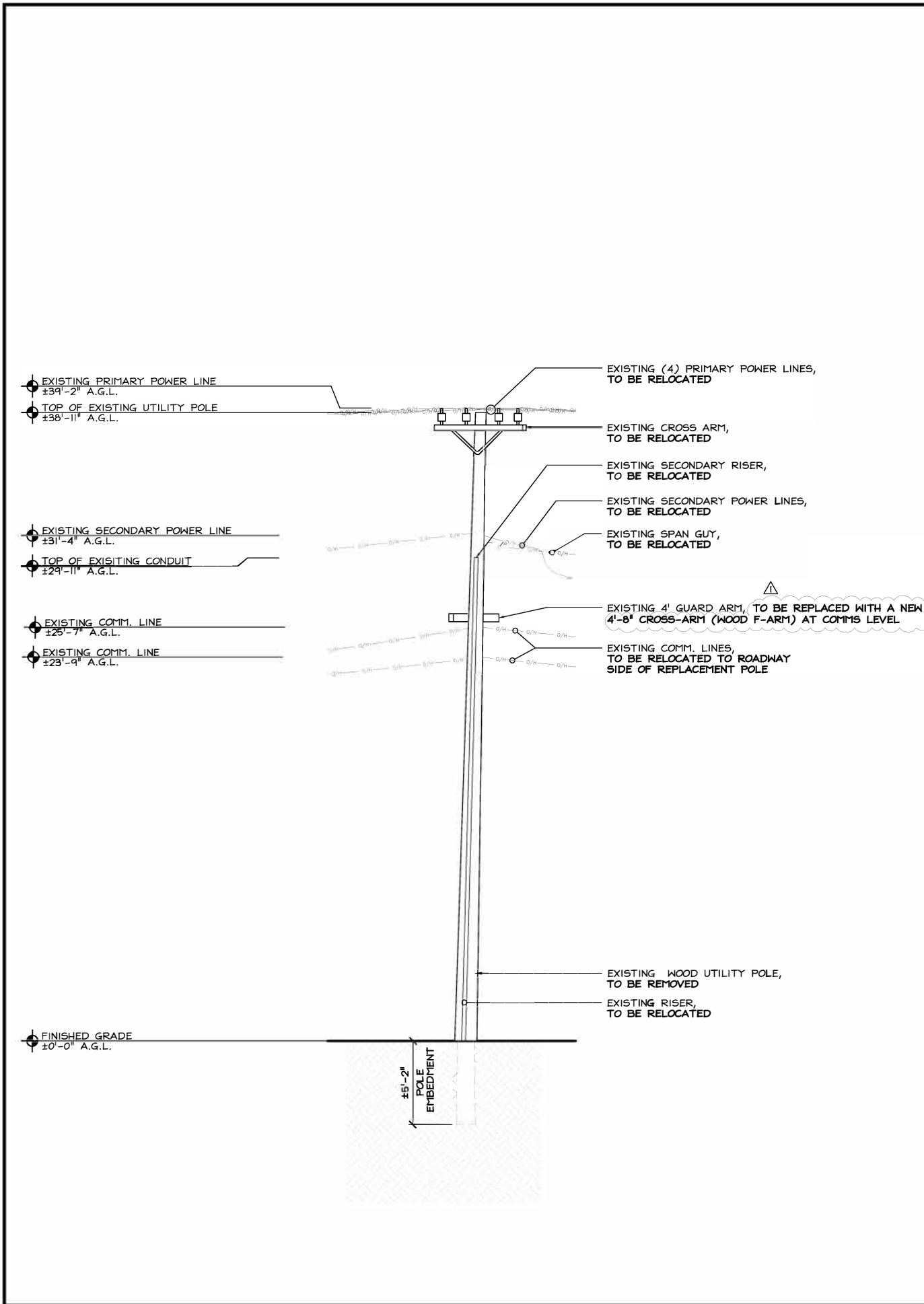
A-2

ENLARGED SITE PLAN

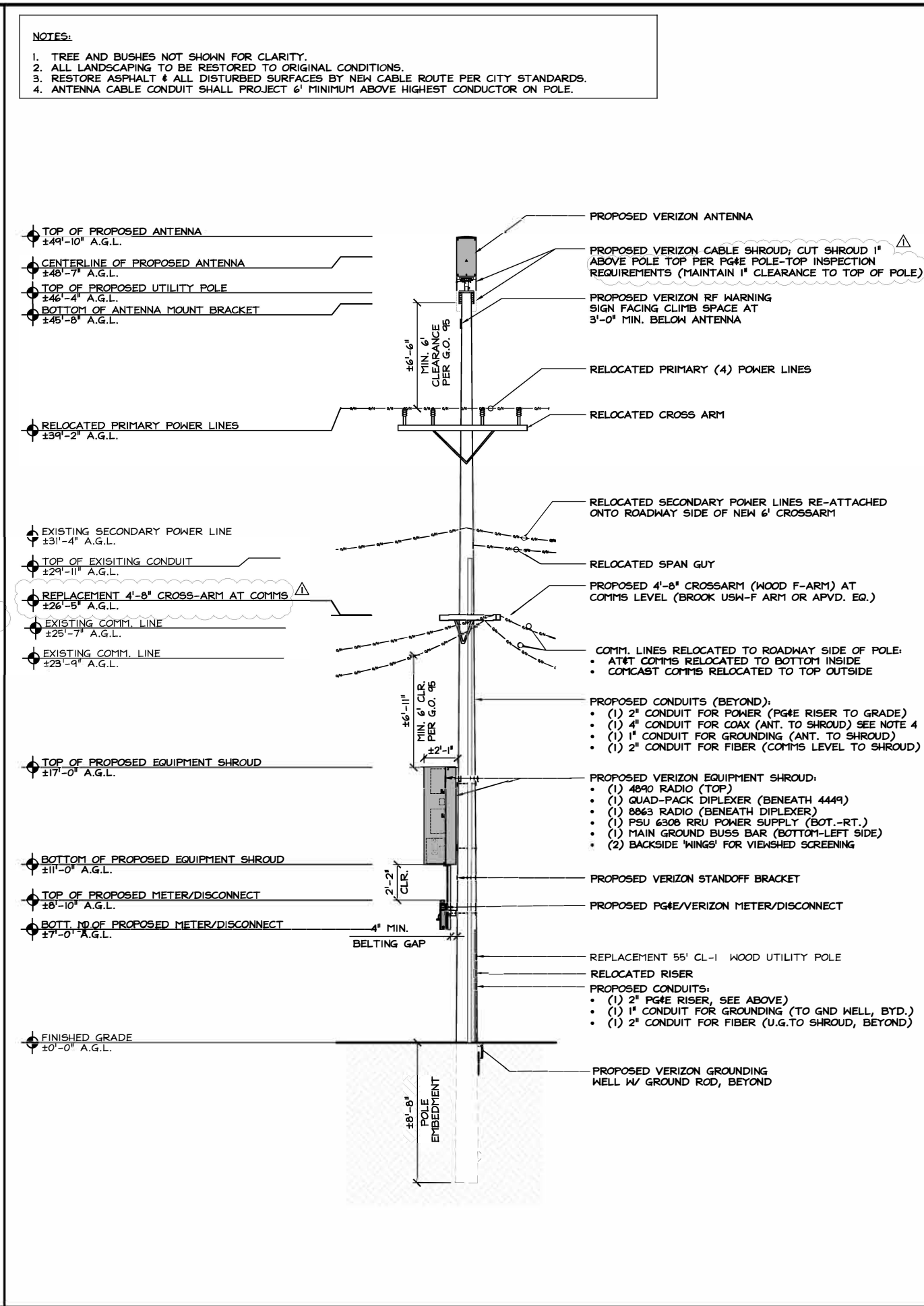
24"x36" SCALE: 3/8" = 1'-0"
11"x17" SCALE: 3/16" = 1'-0"



1



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



PROPOSED NORTHWEST ELEVATION 24"x36" SCALE: 1/4" = 1'-0" 11"x17" SCALE: 1/8" = 1'-0" 1

- 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.

ATTACHMENT 3

verizon

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94594

SEQUOIA
DEPLOYMENT SERVICES, INC.

1 SPECTRUM POINTE DRIVE, SUITE 130
LAKE FOREST, CA 92630-2283

ALLSTATES
ENGINEERING & SURVEYING

23675 BIRCHER 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

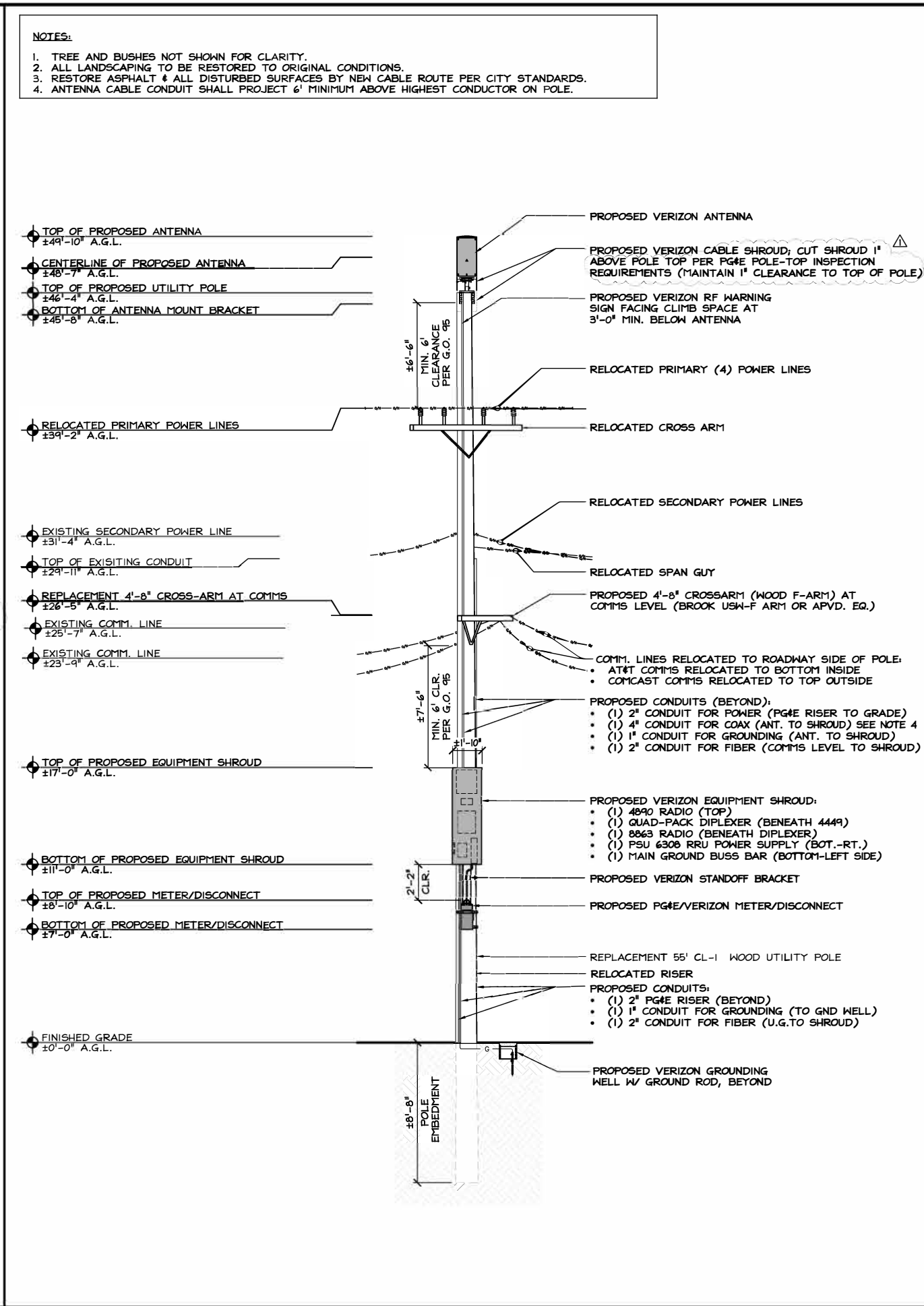
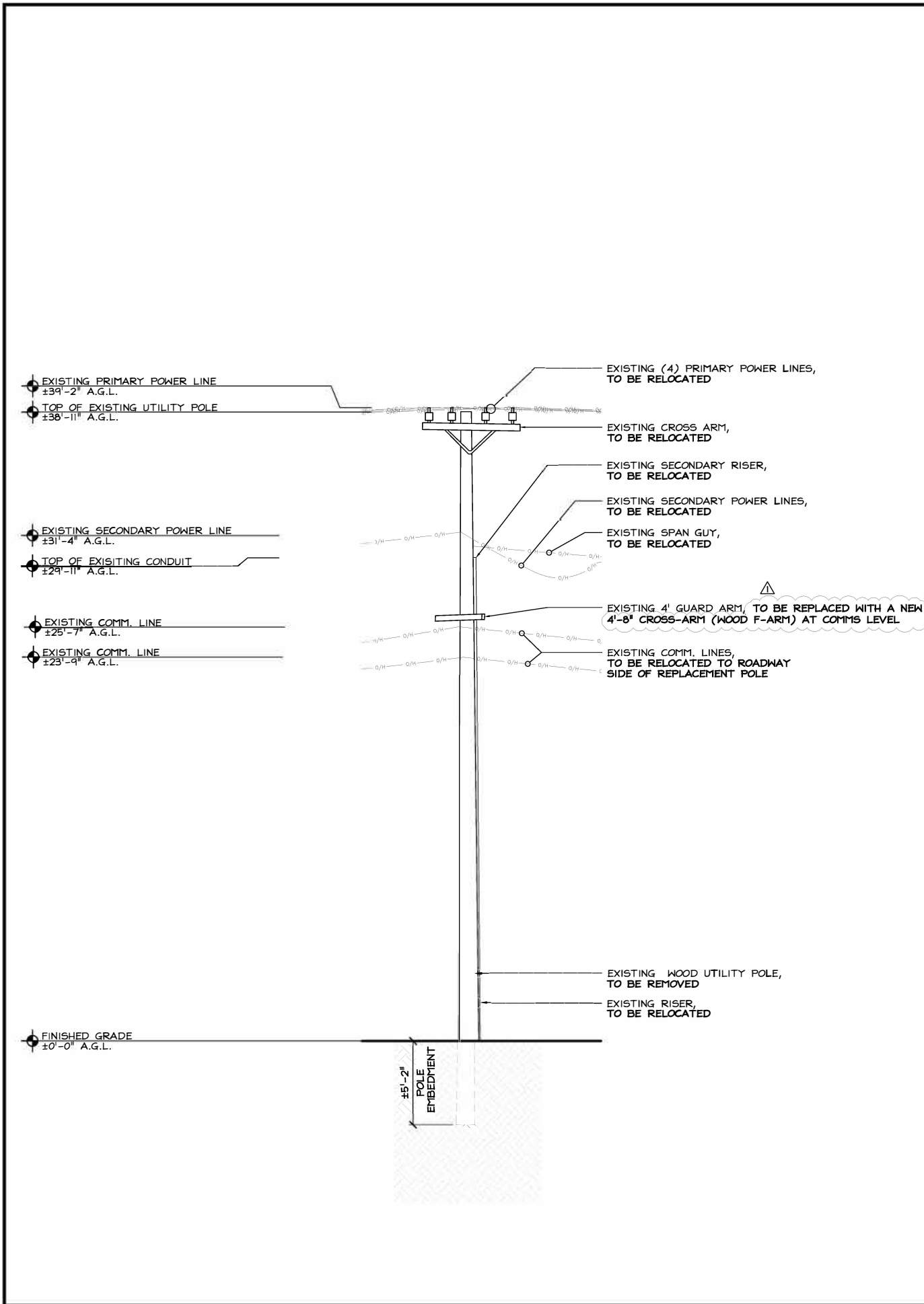
REGISTERED PROFESSIONAL ENGINEER
WESAM ZALZALI
71655
CIVIL
STATE OF CALIFORNIA

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ENGINEER, TO ALTER THIS DOCUMENT.

SC001 CARMELO STONEWALL (OPT.2)
PUB. JC R.O.W. ADJACENT TO:
FO CARMELO ST, 4 SOUTHEAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

SHEET TITLE
ELEVATIONS

SHEET NUMBER
A-3



ATTACHMENT 3

verizon

2770 SHADELANDS DR. BUILDING 11
WALNUT CREEK, CA 94594

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

ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER 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)
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

REGISTERED PROFESSIONAL ENGINEER
WESAM ZALZALI
71655
CIVIL
STATE OF CALIFORNIA

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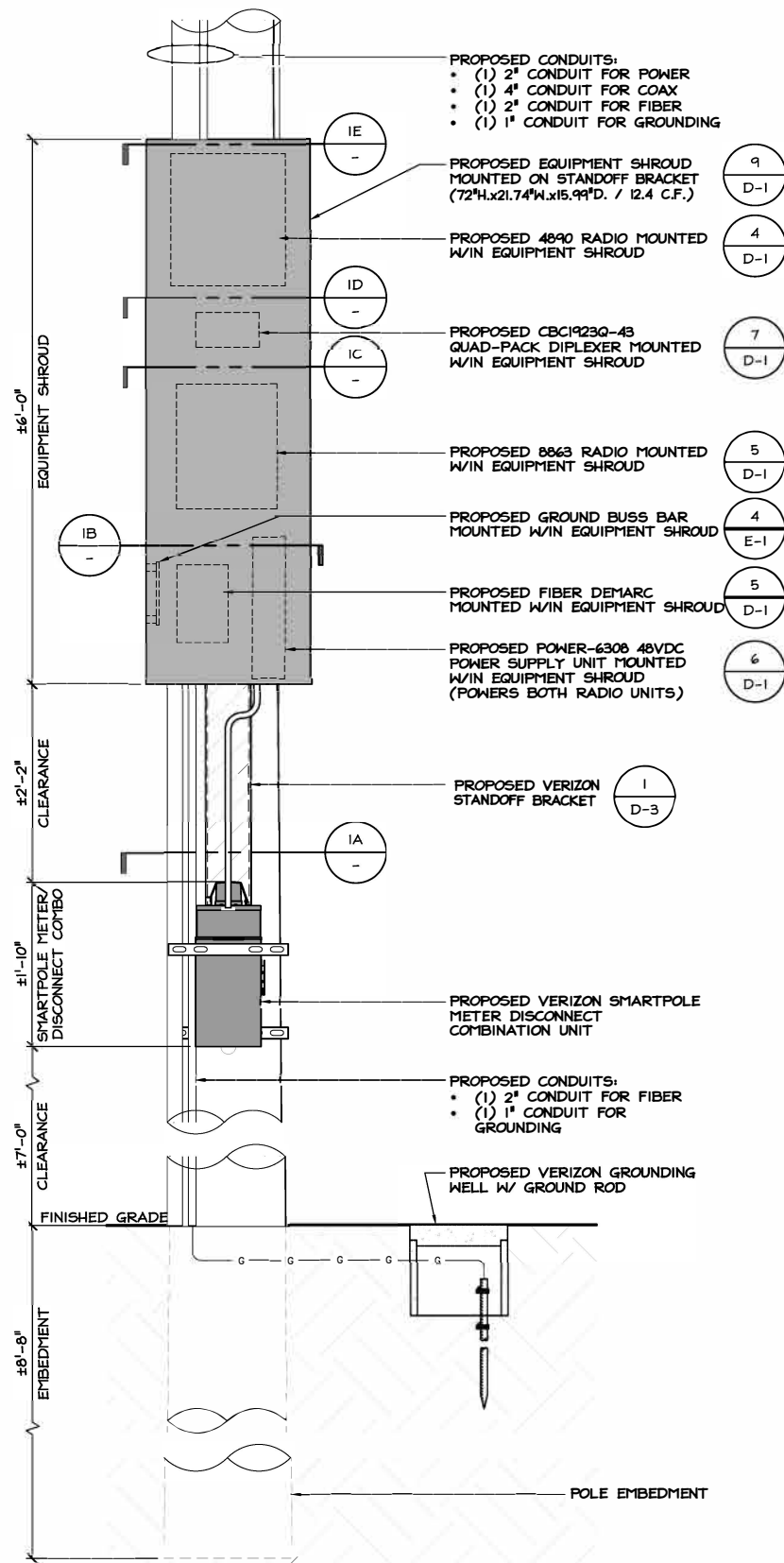
SC001 CARMELO STONEWALL (OPT.2)
PUB. J.C. R.O.W. ADJACENT TO:
FO CARMELO ST, 4 SOUTHEAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 500081318

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

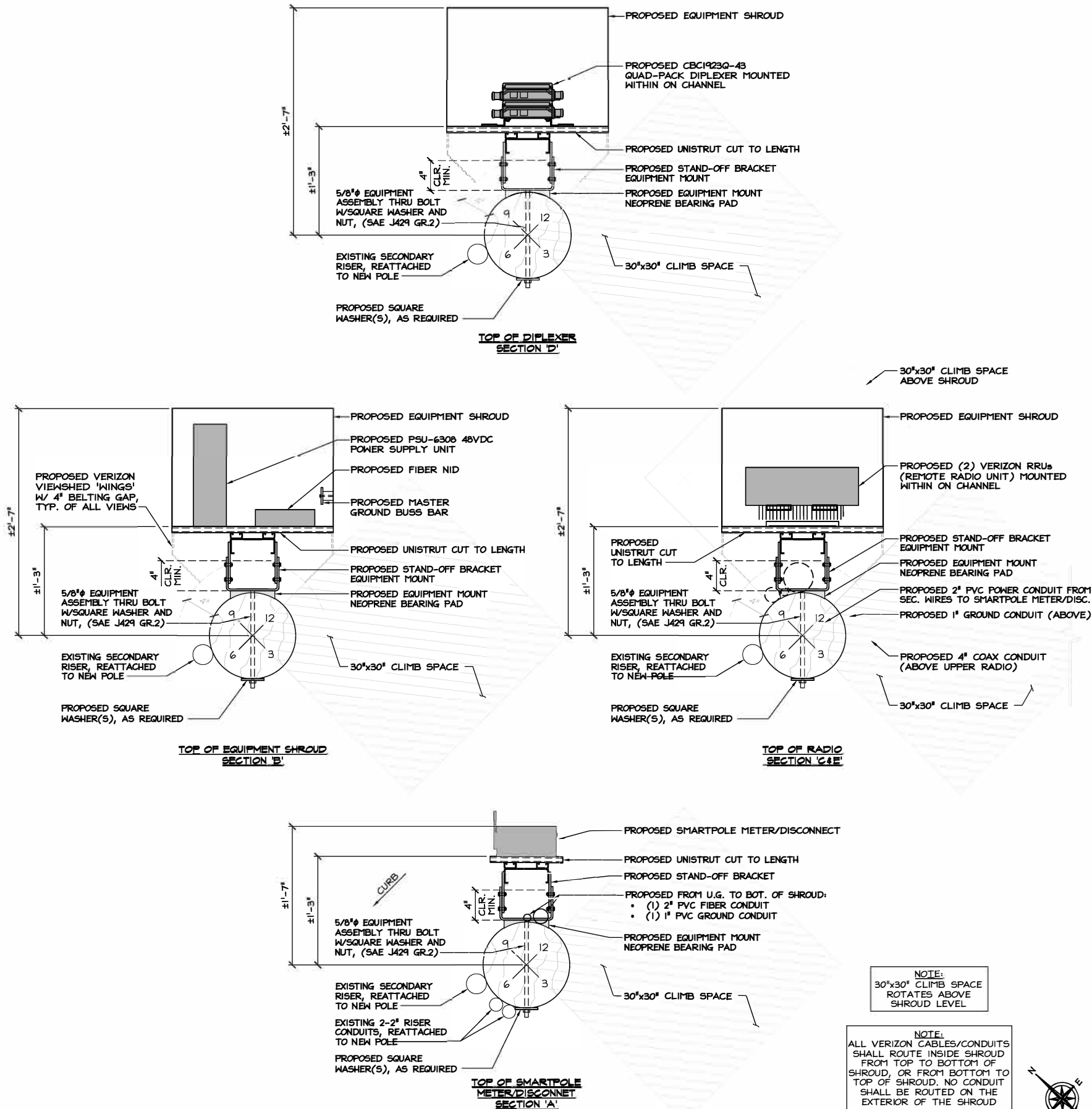


PROPOSED ELEVATION

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

2

PROPOSED EQUIPMENT LAYOUT PLAN



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

1

ATTACHMENT 3

verizon
2770 SHADELANDS DR. BUILDING 11
WALNUT CREEK, CA 94594

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

ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER 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
WASAM 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 P.O.W. ADJACENT TO:
FO 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

21.74

72.00

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

15.99

COMBINED MOUNT, FLUSH
CONFIGURATION SHOWN IN
THIS VIEW

COMMSCOPE
DUPLEXER CBC1923Q-43

ERICSSON 8843
DUAL BAND RRH

6.73

ERICSSON 8843
DUAL BAND RRH

8.00

B POSITION
GROUND BAR

ERICSSON POWER 6302 PSU

FIB

DOOR & HEAT
DEFLECTOR HIDDEN TO
SHOW EQUIPMENT

4.00

ELECTRICAL SPECIFICATIONS:

MAX. INPUT POWER:
-40°C TO +55°C
NOMINAL INPUT VOLTAGE:
RATED OPER. VOLTAGE RANGE:
EXTERNAL INPUT FUSE:
EXTERNAL AC FEED BREAKER:
COLOR:
MAX -48VDC OUTPUT:

63A MAX. @ 240VAC
-40°C TO +55°C
120VAC ± 240 VAC
86-140 VAC ± 172-264 VAC
60A @ 120 OR 240 VAC
2P/60A @ 240V
GRAY (NCS 5 1002-B)
6.0KW

-48VDC POWER OUTPUT PORTS (2x #4AWG)

-48VDC POWER OUTPUT PORTS (7 @ 50A MAX.)

AC POWER INPUT

SIGNAL INTERFACE PORTS

CONNECTION FOR (1) #6AWG DOUBLE-HOLE GROUNDING LUG

WEIGHT: 14.0Kg 30.86 LBS.

H

W

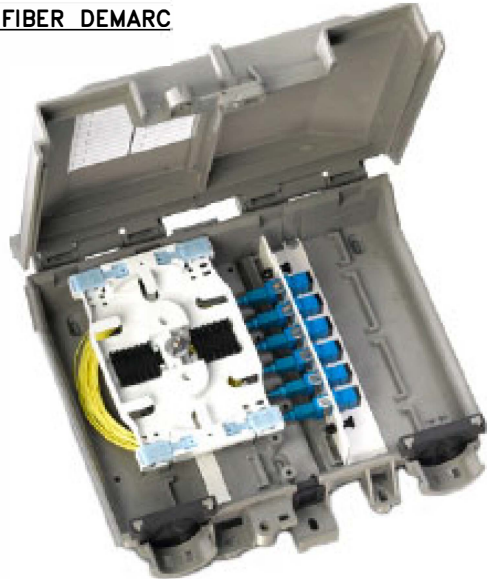
D



ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER DRIVE
LAKE FOREST, CA 92630

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

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 SINGLE OR DU DOOR ENCLOS
EXPOSURE RATING:	OUTDOOR / NE + FOREIGN MA INTRUSION (FI PROTECTION NON-METALLIC ENCLOSURE
ATTACHMENT:	DIRECT-MOUNT BACKBOARD, UNISTRUT OR PIPE-MOUNT
COLOR:	GRAY
UL LISTING:	UL 497



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

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

- 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 1BW TDD
- 2 x 25 Gbps CPRI (COMPATIBLE TO 10G) CPRI SFP28
- -48 VDC, MAX ~ 1360W (80%TX-20%RX)

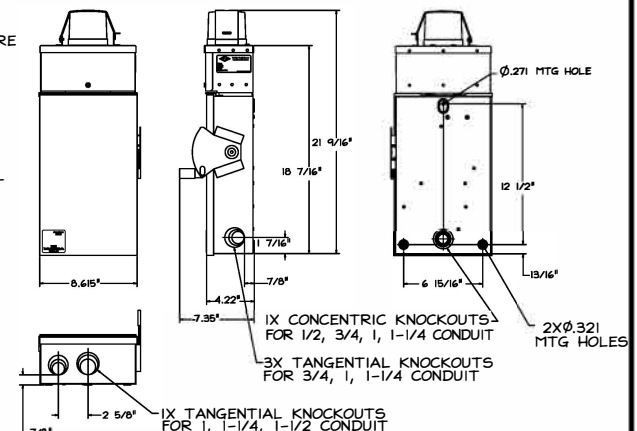


SMARTPOLE METER - CODE : M241492(BY OTHERS)	3
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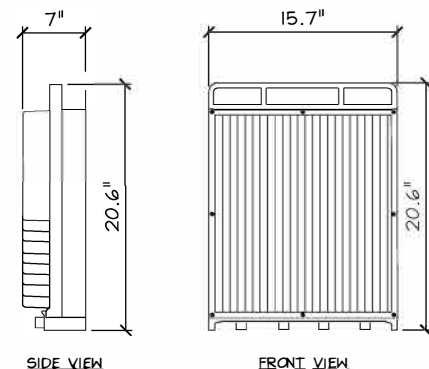
TRANSFORMER-RATED SMARTPOLE METER DISCONNECT BOX
(OR APPROVED EQUAL)

- 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) LINED DOWN STRAP
- 4-PIN RECEPTACLE
- TAMPER RESISTANT 1/4" SEAL
- GROUND/BONDING LUG
- NEMA 3R ENCLOSURE
- OPTIONAL POLE MOUNTING BRACKET (CAT. 703-PB)



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

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

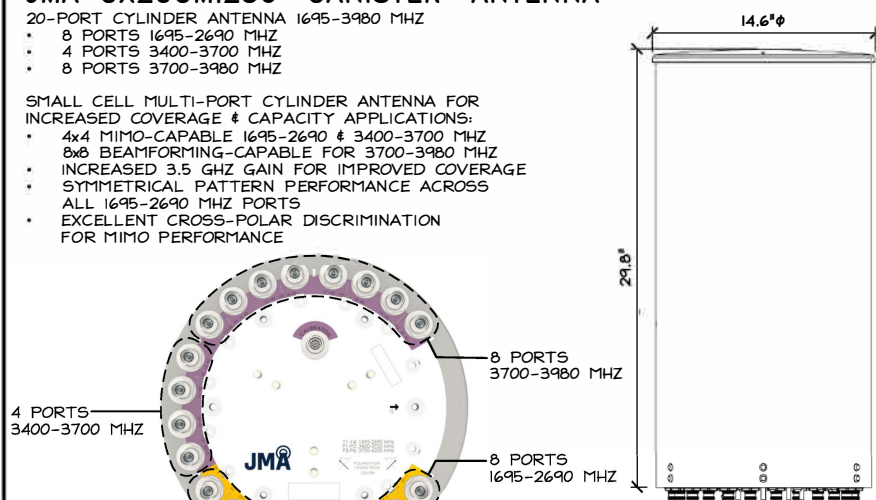


SMARTPOLE METER DISCONNECT BOX (M241692)	2
---	----------

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
 - * EXCELLENT CROSS-POLAR DISCRIMINATION FOR MIMO PERFORMANCE



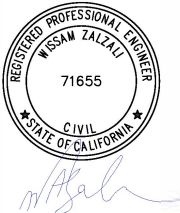
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24"x36" SCALE: NT
11"x17" SCALE: NTS

1

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

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

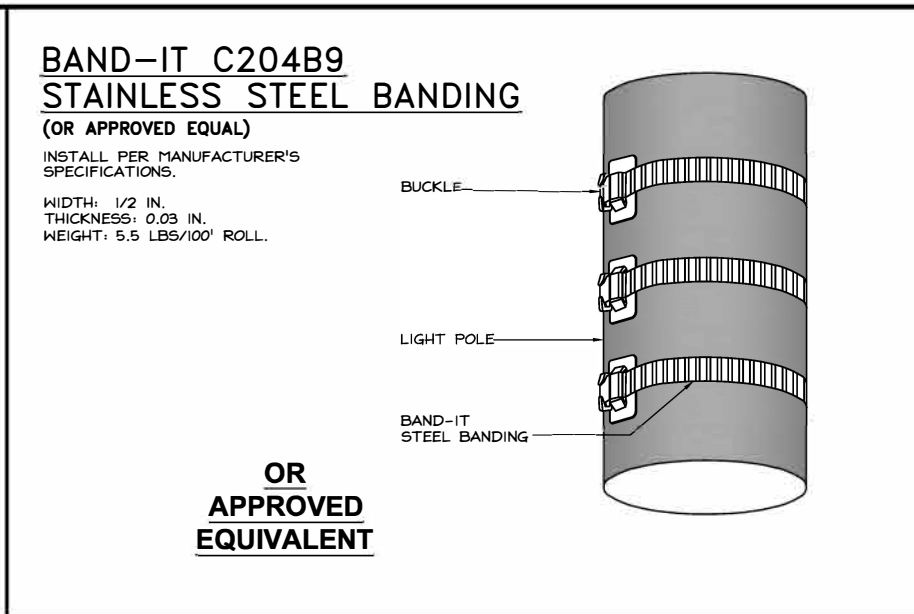
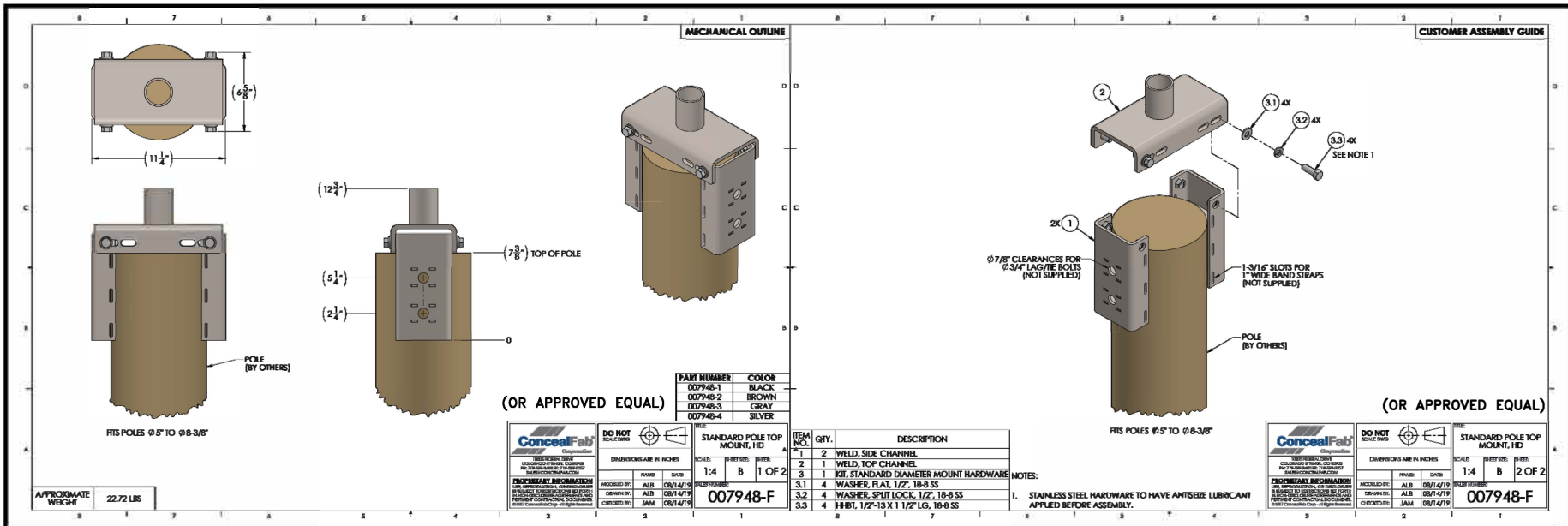


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PUBLIC R.O.W. ADJACENT TO:
IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

SHEET TITLE
EQUIPMENT DETAILS

SHEET NUMBER
D-1



ATTACHMENT 3

verizon

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94594

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

ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER DRIVE
LAKE FOREST, CA 92630

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

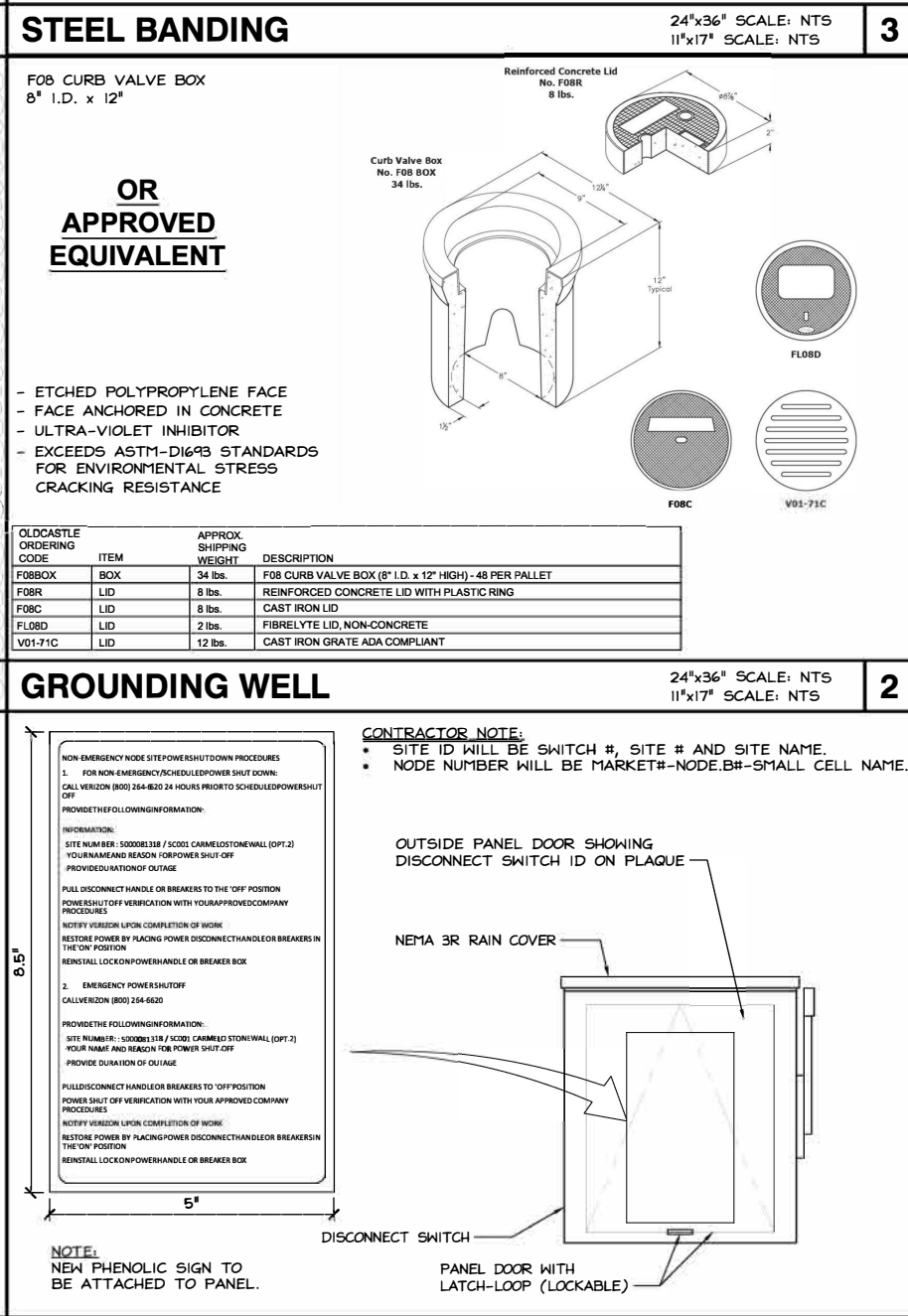
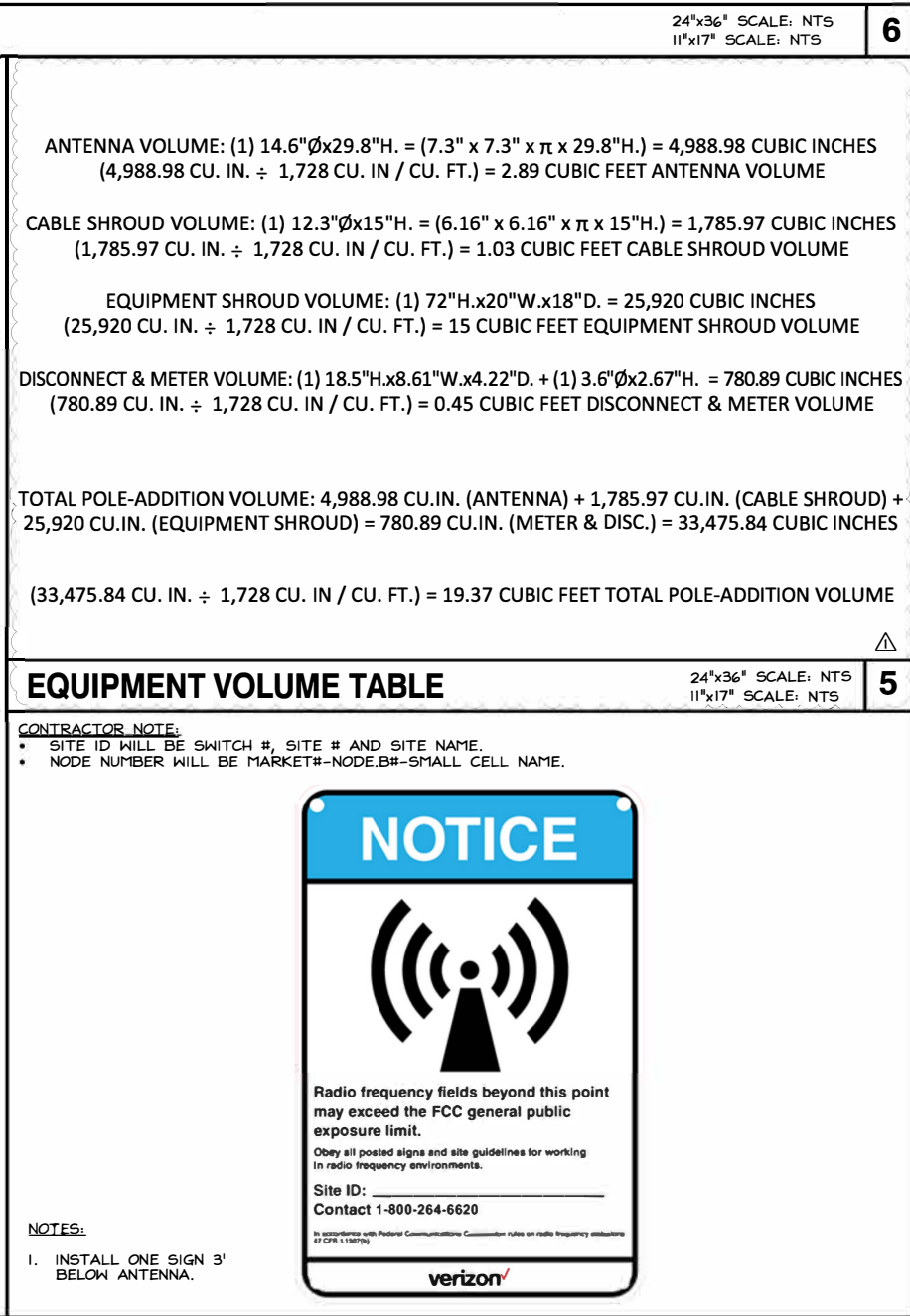
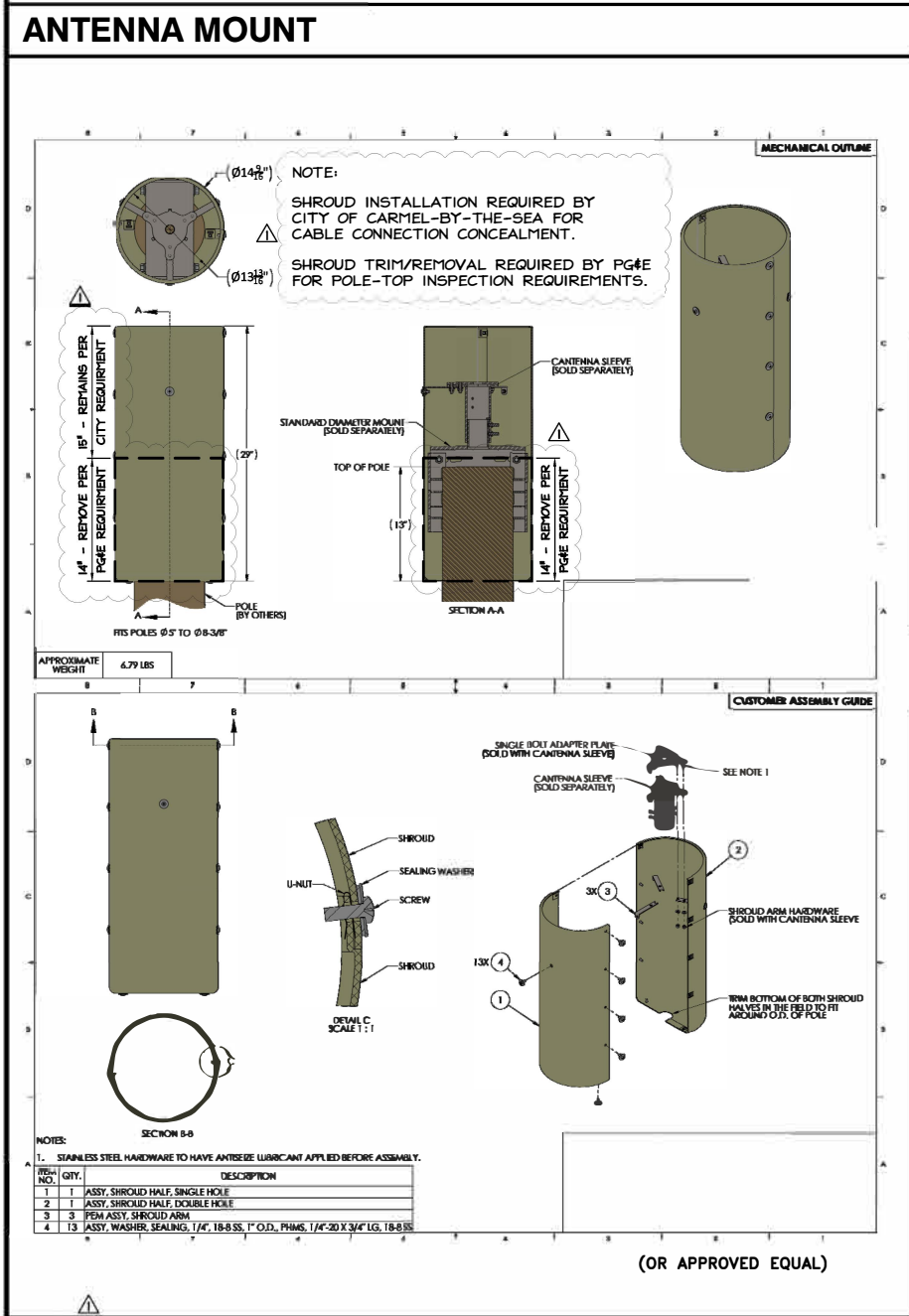
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3	10/21/2024	100% CD's (VIEWSHED)
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5	06/17/2024	100% CD's (RADIO UPDATE)
6	06/06/2023	100% CD's FOR SUBMITTAL
7	04/27/2023	90% CD's FOR REVIEW

OLDCASTLE ORDERING CODE

ITEM	APPROX. SHIPPING WEIGHT	DESCRIPTION
F08BOX	34 lbs.	F08 CURB VALVE BOX (8" I.D. x 12" HIGH) - 48 PER PALLET
F08R	8 lbs.	REINFORCED CONCRETE LID WITH PLASTIC RING
F08C	8 lbs.	CAST IRON LID
F08D	2 lbs.	FIBRELYTE LID, NON-CONCRETE
V01-71C	12 lbs.	CAST IRON GRATE ADA COMPLIANT

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

3



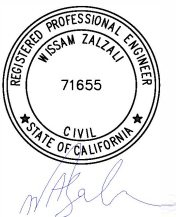
GROUNDING WELL

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

2

2

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

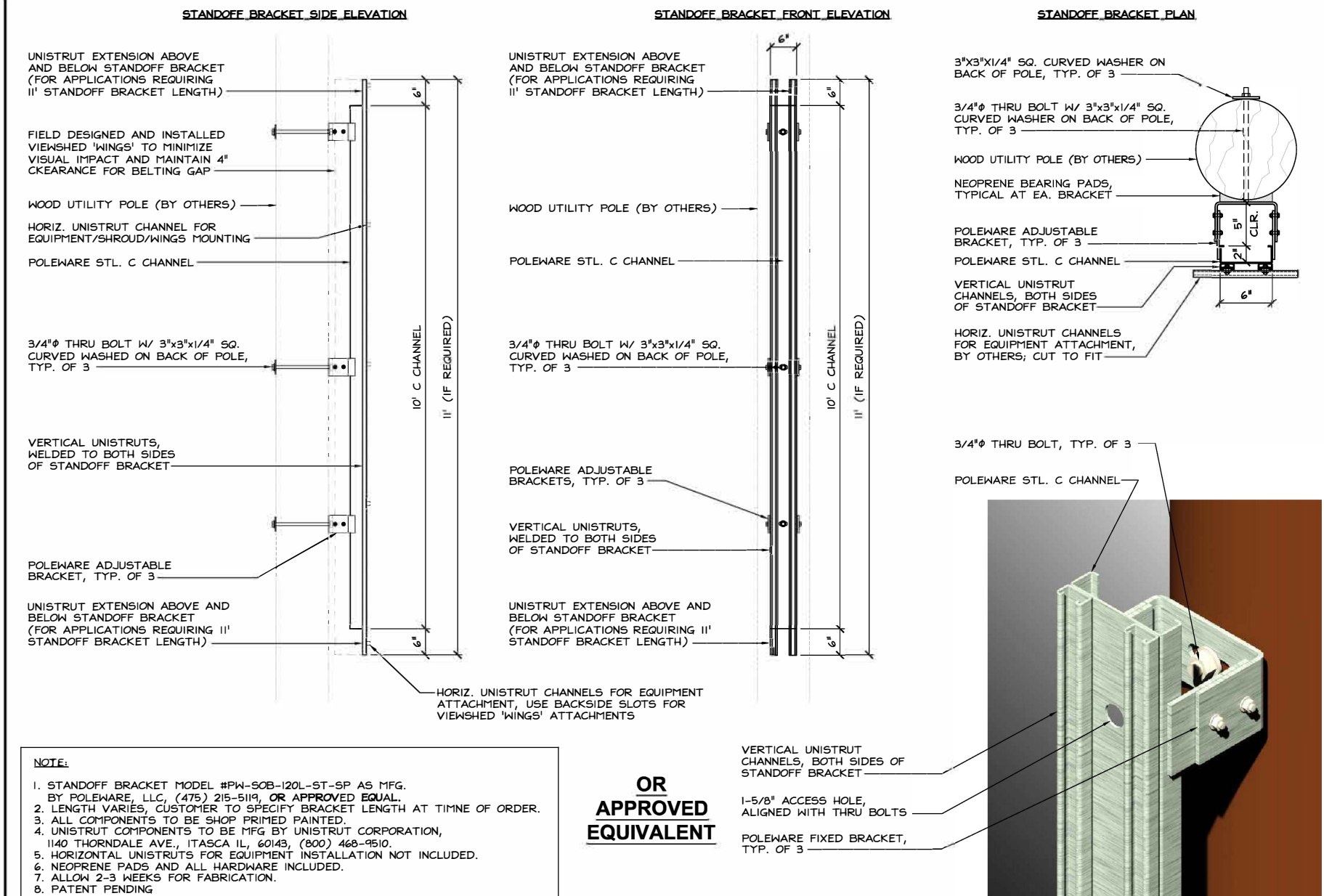
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1FO CARMELO ST, 4 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

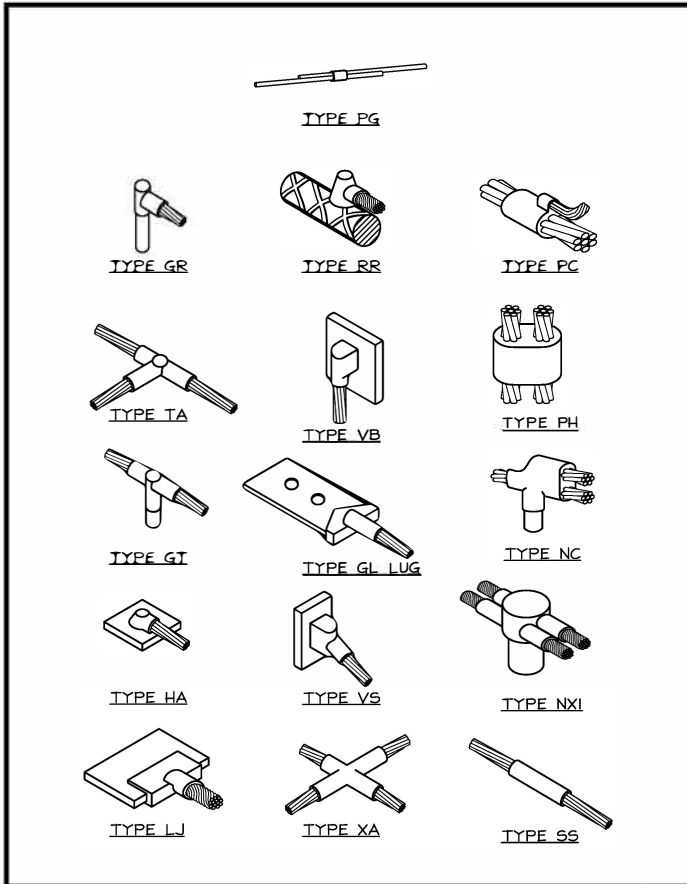
SHEET TITLE
EQUIPMENT DETAILS

SHEET NUMBER
D-3

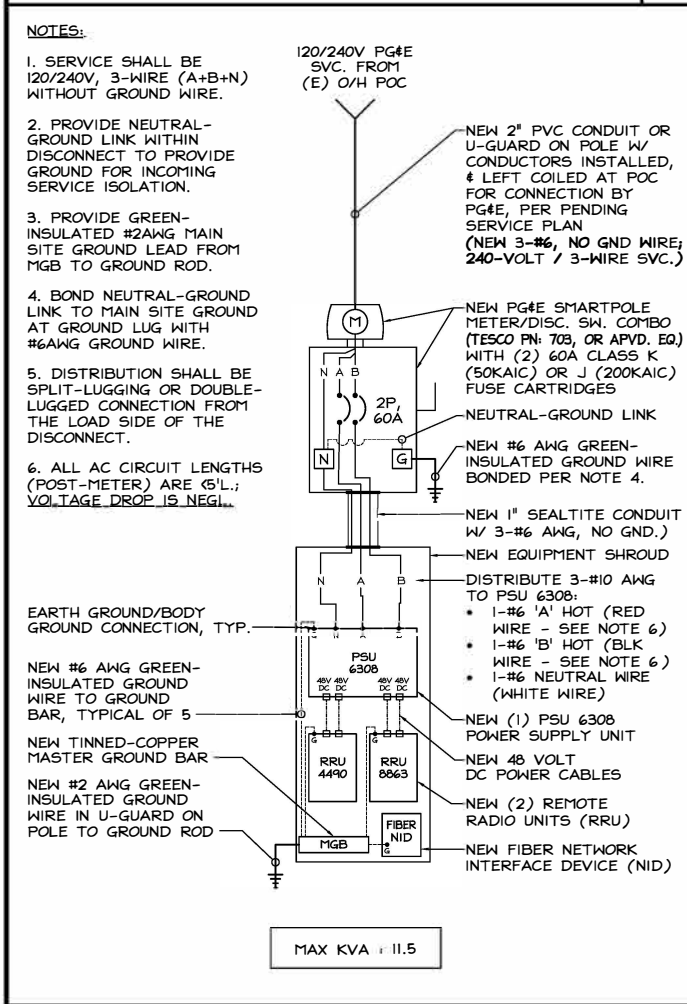


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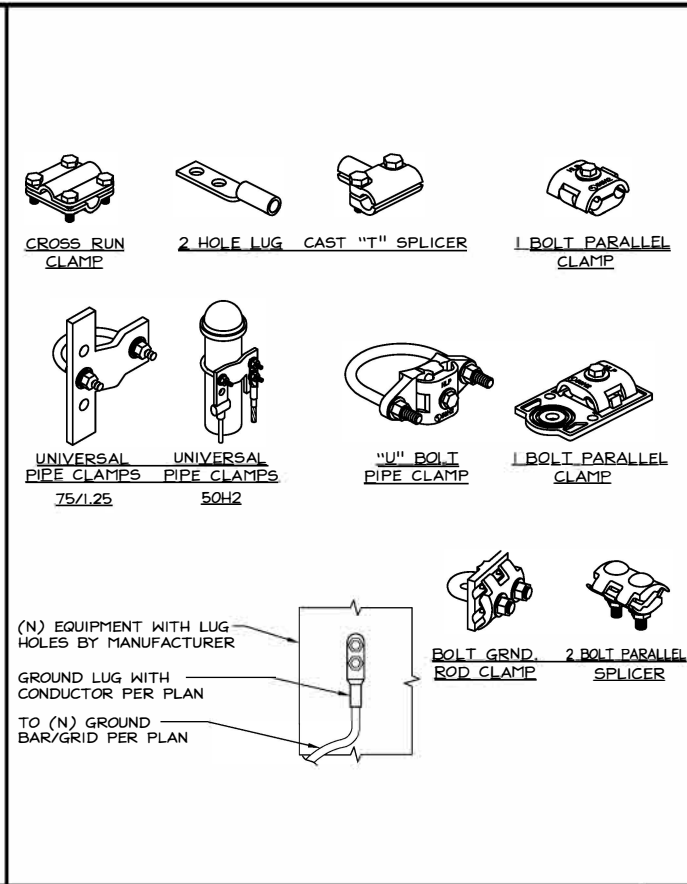
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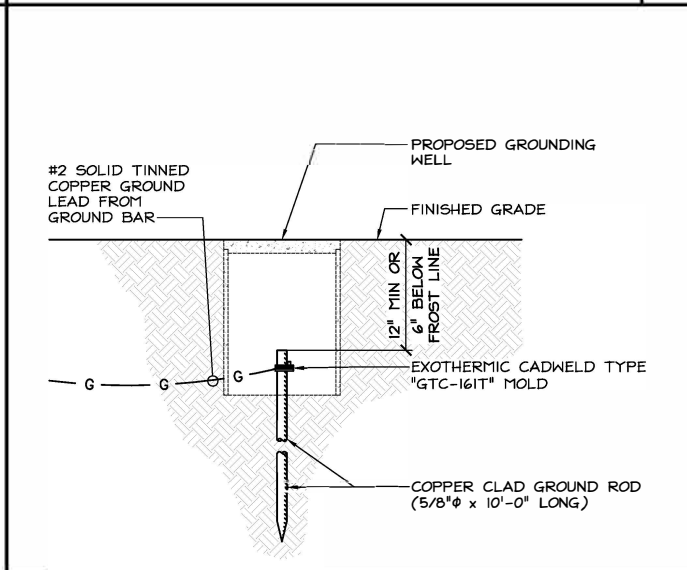
TYPICAL CADWELD TYPES 24"x36" SCALE: NTS 11"x17" SCALE: NTS **8**



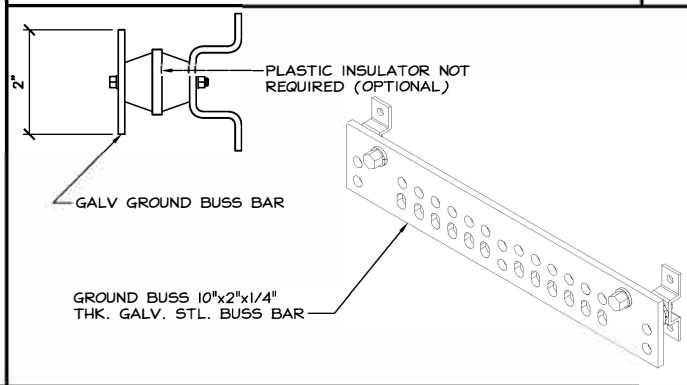
SINGLE LINE DIAGRAM 24"x36" SCALE: NTS 11"x17" SCALE: NTS **7**



MECHANICAL CONNECTIONS SCALE: NTS **6**



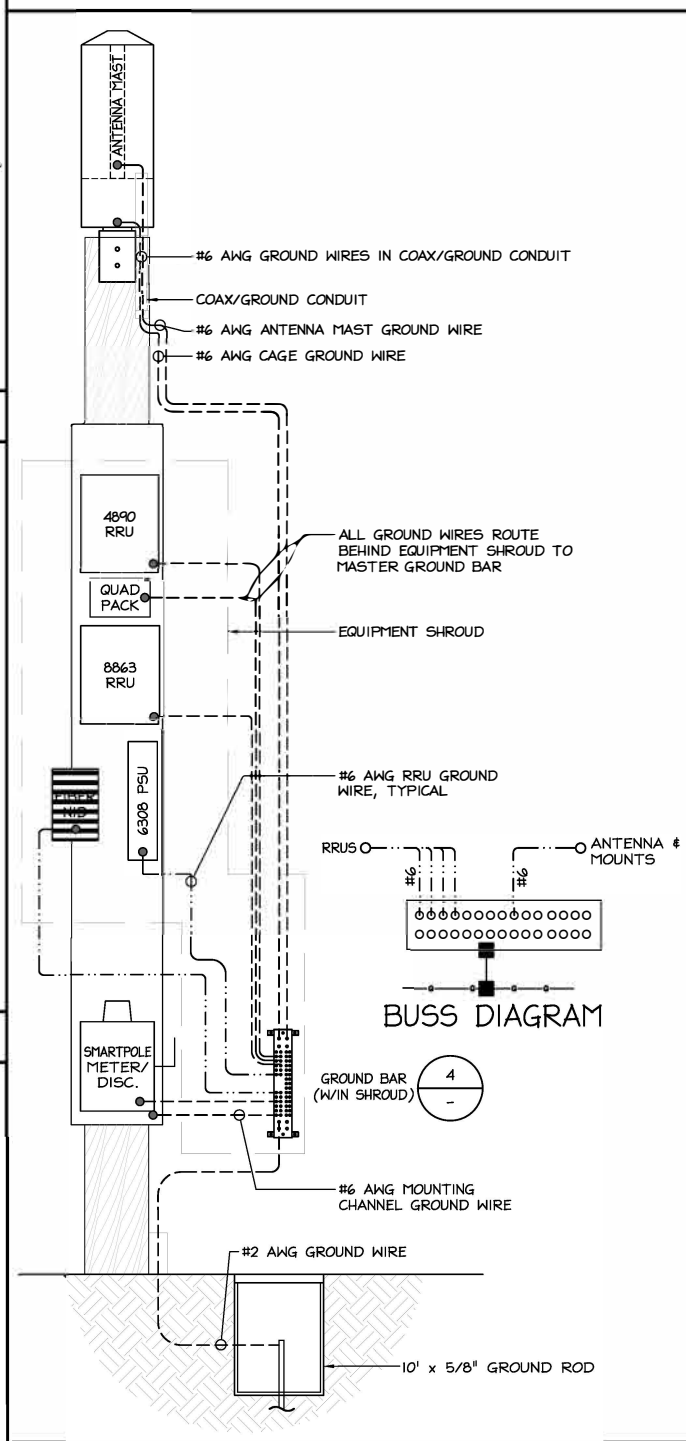
GROUND WELL/ROD 24"x36" SCALE: NTS 11"x17" SCALE: NTS **5**



GROUND BUSS BAR 24"x36" SCALE: NTS 11"x17" SCALE: NTS **4**



NOT USED



GROUND RISER DIAGRAM 24"x36" SCALE: NTS 11"x17" SCALE: NTS **3**

GENERAL ELECTRICAL NOTES:

1. PROVIDE ALL ELECTRICAL WORK & MATERIALS AS SHOWN ON THE DWGS, AS CALLED FOR HEREIN, & AS IS NECESSARY TO FURNISH A COMPLETE INSTALLATION.
2. THE INSTALLATION SHALL CONFORM TO THE REQUIREMENTS OF THE CURRENT ADOPTED CALIFORNIA ELECTRICAL CODE, STATE OF CALIFORNIA TITLE24, ALL OTHER APPLICABLE CODES AND ORDINANCES & THE REQUIREMENTS OF THE FIRE MARSHALL. ALL EQUIPMENT WIRING SHALL BEAR THE APPROVAL STAMP OF UNDERWRITERS LABORATORY (UL) OR AN APPROVED TESTING LABORATORY, PAYMENT FOR ALL INSPECTION FEES AND PERMITS ARE PART OF THIS CONTRACT.
3. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE SAFETY AND GOOD CONDITION OF ALL MATERIALS & EQUIPMENT FOR THE ENTIRE INSTALLATION & UNIT COMPLETION OF WORK, ERECT & MAINTAIN APPROVED & SUITABLE BARRIERS, PROTECTIVE DEVICES & WARNING SIGNS, BE FULLY RESPONSIBLE FOR ANY LOSS OR INJURY TO PERSONS OR PROPERTY RESULTING FROM NEGLIGENCE AND/OR ENFORCEMENT OF ALL SAFETY PRECAUTIONS & WARNINGS.
4. COORDINATE THE ELECTRICAL INSTALLATION WITH ALL OTHER TRADES.
5. ALL SAW CUTTING, TRENCHING, BACK FILLING & PATCHING SHALL BE PART OF THIS CONTRACT.
6. FINALIZE ALL ELECTRICAL SERVICE ARRANGEMENTS, INCLUDING VERIFICATION OF LOCATIONS, DETAILS, COORDINATION OF THE INSTALLATION & PAYMENT OF ACCRUED CHARGES WITH LOCAL POWER COMPANY, VERIFY LOCATION FOR FACILITIES & DETAILS WITH POWER UTILITY, IN ADDITION TO THE REQUIREMENTS SHOWN IN THE CONTRACT DOCUMENTS, WORK SHALL COMPLY WITH CONSTRUCTION STANDARDS & SERVICE REQUIREMENTS OF THE RESPECTIVE UTILITIES, INCLUDING ANY SUPPLEMENTAL DWGS ISSUED & SHALL BE SUBJECT TO APPROVAL OF THESE UTILITIES.
7. ALL WIRING SHALL BE COPPER. INSULATION FOR BRANCH CIRCUIT CONDUCTORS SHALL BE TYPE "THWN" CONDUCTORS LARGER AND #6 AWG MAY BE TYPE "THWN" OR "TWN".
8. PROVIDE CONDUIT SEALS FOR ALL CONDUITS PENETRATING WEATHERPROOFING OR WEATHERPROOF ENCLOSURE ENVELOPE, MASTIC SEAL ALL CONDUIT OPENING PENETRATIONS COMPLETELY WATERTIGHT.
9. UNLESS SHOWN OTHERWISE, FUSED DISCONNECT SWITCHES SHALL BE PROVIDED WITH LOW-PEAK, SDUAL ELEMENT FUSES SIZED TO EQUIPMENT NAMEPLATE FUSE CURRENT RATING. MOTOR STARTERS SHALL BE PROVIDED WITH SIMILARLY SIZED FUSIBLE ELEMENTS, SWITCHES AND OTHER OUTDOOR EQUIPMENT SHALL BE RATED NEMA 3R AND/OR UL LISTED FOR WET ENVIRONMENT.
10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR TESTING THE GROUNDING SYSTEM AND ENSURING A 5 OHM OR LESS GROUNDINGPATH, ADDITIONAL GROUND RODS AND/OR CHEMICAL ROD SYSTEM SHALL BE USED TO ACHIEVE THIS REQUIREMENT IF THE GIVEN DESIGN CANNOT BE MADE TO ACHIEVE THIS REQUIREMENT.

POWER AND TELCO NOTES:

1. POWER AND TELCO POINTS OF CONNECTION AND ANY EASEMENTS ARE PRELIMINARY AND SUBJECT TO CHANGE BY THE UTILITY COMPANIES.
2. CONTRACTOR SHALL COORDINATE WITH UTILITY COMPANY FOR FINAL AND EXACT WORK/MATERIALS REQUIREMENTS AND CONSTRUCT TO UTILITY ENGINEERING PLANS AND SPECIFICATIONS ONLY WHERE APPLICABLE PER PROJECT SCOPE OF WORK.
3. CONTRACTOR SHALL FURNISH AND INSTALL CONDUIT, PULL WIRES, CABLE PULL BOXES, CONCRETE ENCASMENT OF CONDUIT, TRANSFORMER PAD, BARRIERS, POLE RISER TRENCHING, BACK FILL, AND UTILITY FEES, AND INCLUDE REQUIREMENTS IN SCOPE.
4. CONTRACTOR SHALL LABEL ALL MAIN DISCONNECT SWITCHES AS REQUIRED BY CODE.

NOTES:

1. SUBCONTRACTOR SHALL PROVIDE DIST. PANEL AND BREAKERS FOR POWER TO EQUIPMENT.
2. ALL SERVICE EQUIPMENT AND INSTALLATIONS SHALL COMPLY WITH THE N.E.C. AND UTILITY COMPANY AND LOCAL CODE REQUIREMENTS.
3. SUBCONTRACTOR SHALL PROVIDE ELECTRICAL SERVICE ENTRANCE EQUIPMENT WITH FAULT CURRENT RATINGS GREATER THAN THE AVAILABLE FAULT CURRENT FROM THE POWER UTILITY.
4. MAXIMUM ONE WAY CIRCUIT RUN NOT TO EXCEED 75 FEET.

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

ATTACHMENT 3

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2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94594

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
1	10/30/2025	100% CD (PCC-1)
4	11/12/2024	100% CD (NEW RFDS)
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0	06/06/2023	100% CD's FOR SUBMITTAL
A	04/27/2023	90% CD's FOR REVIEW

REGISTERED PROFESSIONAL ENGINEER
M. ASAM ZALZALI
71655
CIVIL
STATE OF CALIFORNIA

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SC001 CARMELO STONEWALL (OPT.2)
PUB. R.O.W. ADJACENT TO:
FO CARMELOST, 4 SOUTHEAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

SHEET TITLE
ELECTRICAL & GROUNDING DIAGRAMS, NOTES

SHEET NUMBER
E-1

1. ALL TEMPORARY TRAFFIC CONTROL SIGNAGE, LAYOUTS, AND PROCEDURES SHALL COMPLY WITH LOCAL JURISDICTIONAL REQUIREMENTS AND MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES (MUTCD), LATEST EDITION, WHICHEVER IS MORE STRINGENT.
2. PRIOR TO ANY ROAD CONSTRUCTION, TRAFFIC CONTROL SIGNS AND DEVICES SHALL BE IN PLACE.
3. TRAFFIC CONTROL DEVICES FOR LANE CLOSURES INCLUDING SIGNS, CONES, BARRICADES, ETC. SHALL BE PLACED AS SHOWN ON PLANS. SIGNS SHALL NOT BE PLACED WITHOUT ACTUAL LANE CLOSURES AND SHALL BE IMMEDIATELY REMOVED UPON REMOVAL OF THE CLOSURES.
4. SELECTION, PLACEMENT, MAINTENANCE, AND PROTECTION OF TRAFFIC, PEDESTRIANS, AND WORKERS SHALL BE IN ACCORDANCE WITH THE MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES (MUTCD) - PART VI "TEMPORARY TRAFFIC CONTROL", AND LOCAL JURISDICTIONAL REQUIREMENTS UNLESS OTHERWISE NOTED IN THE PLANS AND SPECIFICATIONS, AND SHALL BE APPROVED BY THE APPROPRIATE HIGHWAY AUTHORITY HAVING JURISDICTION.
5. ADVANCE WARNING SIGNS, DISTANCES, AND TAPER LENGTHS MAY BE EXTENDED TO ADJUST FOR REDUCED VISIBILITY DUE TO HORIZONTAL AND VERTICAL CURVATURE OF THE ROADWAY AND FOR ACTUAL TRAFFIC SPEEDS IF IN EXCESS OF POSTED SPEED LIMITS.
6. TAPERS SHALL BE LOCATED TO MAXIMIZE THE VISIBILITY OF THEIR TOTAL LENGTH.
7. CONFLICTING OR NON-OPERATING SIGNAL INDICATIONS ON THE (E) TRAFFIC SIGNAL SYSTEMS SHALL BE BAGGED OR COVERED.
8. ALL (E) ROAD SIGNS, PAVEMENT MARKINGS AND/OR PLOWABLE PAVEMENT REFLECTORS WHICH CONFLICT WITH THE (N) TRAFFIC CONTROL PLAN SHALL BE COVERED, REMOVED, OR RELOCATED. ALL TRAFFIC CONTROL DEVICES SHALL BE RESTORED TO MATCH PRE-CONSTRUCTION CONDITION AFTER COMPLETION OF WORK.
9. CONTRACTOR SHALL CONTACT LOCAL AUTHORITY HAVING HIGHWAY JURISDICTION AND PROVIDE ADDITIONAL "FLAGMEN" OR POLICE SUPERVISION, IF REQUIRED.
10. ALL EXCAVATED AREAS WITHIN OR ADJACENT TO THE ROADWAY SHALL BE BACKFILLED AND PLACED ON A MINIMUM 6:1 SLOPE PRIOR TO END OF EACH WORK DAY. OTHER EXCAVATED AREAS WITHIN THE CLEAR ZONE ARE TO BE EITHER BACKFILLED OR PRECAST CONCRETE CURB BARRIER CONSTRUCTION BARRIER SET TEMPORARILY IN PLACE TO SHIELD VEHICULAR AND PEDESTRIAN TRAFFIC.
11. WHERE DICTATED BY LOCAL CONDITIONS, THE CONTRACTOR SHALL MAKE PROVISIONS FOR MAINTAINING PEDESTRIAN AND WORKER CROSSING LOCATIONS IN ACCORDANCE WITH ALL APPLICABLE CODES AND OSHA REQUIREMENTS.
12. CONSTRUCTION ZONE SPEED LIMIT IF REDUCED FROM POSTED LIMITS SHALL BE IN ACCORDANCE WITH MUTCD AND WILL BE DETERMINED BY THE AUTHORITY HAVING JURISDICTION.
13. THERE SHALL BE NO WORKERS, EQUIPMENT, OR OTHER VEHICLES IN THE BUFFER SPACE OR THE ROLL AHEAD SPACE.
14. DRIVENAYS AND/OR SIDE STREETS ENTERING THE ROADWAY AFTER THE FIRST ADVANCE WARNING SIGN SHALL BE PROVIDED WITH AT LEAST ONE W20-1 SIGN (ROAD WORK AHEAD) AS A MINIMUM.
15. CONES MAY BE SUBSTITUTED FOR DRUMS AND INSTALLED UPON THE APPROVAL OF THE AUTHORITY HAVING JURISDICTION PROVIDED THEY COMPLY WITH MUTCD.
16. THE SPACING BETWEEN CONES, TUBULAR MARKERS, VERTICAL PANELS, DRUMS, AND BARRICADES SHOULD NOT EXCEED A DISTANCE IN FEET EQUAL TO 1.0 TIMES THE SPEED LIMIT IN MPH WHEN USED FOR TAPER CHANNELIZATION, AND A DISTANCE IN FEET EQUAL TO 2.0 TIMES THE SPEED LIMIT IN MPH WHEN USED FOR TANGENT CHANNELIZATION.
17. WHEN CHANNELIZATION DEVICES HAVE THE POTENTIAL OF LEADING VEHICULAR TRAFFIC OUT OF THE INTENDED VEHICULAR TRAFFIC SPACE, THE CHANNELIZATION DEVICES SHOULD BE EXTENDED A DISTANCE IN FEET OF 2.0 TIMES THE SPEED LIMIT IN MPH BEYOND THE DOWNSTREAM END OF THE TRANSITION AREA.
18. TAPER LENGTHS ARE CALCULATED AS FOLLOWS:
 $L = WS^2/60$ (40 MPH AND HIGHER) OR $L = WS$ (OVER 40 MPH),
WHERE W= OFFSET WIDTH (FT.), S= TRAFFIC SPEED (MPH).
19. THE CONTRACTOR SHALL PROVIDE FOR ACCESS TO ALL ADJACENT PROPERTIES DURING WORK HOURS. CONSTRUCTION OPERATIONS SHALL BE CONDUCTED IN SUCH A MANNER AS TO CAUSE AS LITTLE INCONVENIENCE AS POSSIBLE TO ABUTTING PROPERTY OWNERS/OPERATORS.
20. FLASHING YELLOW BEACONS SHALL BE USED ON ALL W20-1 SIGNS AND ALL TYPE II BARRICADES GUARDING THE WORK AREA OVERNIGHT.
21. ALL SIGNS SHALL BE REFLECTORIZED AND STANDARD SIZE.
22. THE CONTRACTOR SHALL HAVE ALL SIGNS, DELINEATORS, BARRICADES, ETC., PROPERLY INSTALLED PRIOR TO COMMENCING CONSTRUCTION. WHEN ROAD WORK SPEED LIMIT SIGN IS PROPOSED (I.E., C17), THE CONTRACTOR SHALL COVER ALL CONFLICTING REGULATORY SPEED LIMIT SIGNS.
23. THE CONTRACTOR SHALL PROVIDE FOR SAFE PEDESTRIAN ACCESS AT ALL TIMES.

1. 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.
2. EXTEND CHANNELIZATION DEVICES INTO SHOULDER WHERE APPLICABLE.
3. DISTANCES AS INDICATED IN TABLE I 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.
4. SHOULDER TAPERS SHOULD BE 1/3 OF THE ON-STREET TAPER LENGTH.
5. MAINTAIN A MINIMUM LANE WIDTH OF 10'.

- - CONE OR DELINEATOR
- - WORK AREA
- - FLAGGER
- - SIGN
- - ROAD STEEL PLATE

W4-2	C30A (CA)	W20-4	W1-3 (LT)	W3-4
W24-1	W21-5	C12 (CA)	W1-3 (RT)	W1-4 (LT)
C9A (CA)	W21-7	R9-11	SC11 (MOD)	W1-6
M4-9a	M4-9b	C30	W20-1	W6-4
C20 (BIKE)	W11-1 / W16-1	R9-9	G20-2	

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



Radio Frequency Supplemental Report #4

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
February 23, 2026

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

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1. Executive Summary

This supplemental analysis was prepared in response to the City's determination that the Golden Bough rooftop may represent a less intrusive alternative to the proposed small wireless facility.

The purpose of this review is not to determine whether measurable signal could be produced from the rooftop, but rather to evaluate whether the Golden Bough location is capable of functioning as a technologically feasible alternative capable of achieving the identified service objectives under realistic deployment conditions.

The original Radio Frequency Report and subsequent supplements established through calibrated drive testing and propagation modeling that a localized service gap exists within this residential coastal area, particularly with respect to reliable in-building performance for mid-band services including AWS (2.1 GHz) and C-Band (3.7 GHz).

Following the hearing, additional technical evaluation was performed, including:

- Application of an uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB to ensure balanced two-way service and conservative in-building performance assessment;
- Comparative AWS path loss modeling of the proposed small cell and the Golden Bough rooftop under identical propagation assumptions;
- Evaluation of antenna configuration constraints associated with rooftop deployment;
- Line-of-sight (LOS) profile and free-space propagation analysis toward an unobstructed two-mile northwest path over water; and
- Assessment of electrical downtilt tradeoffs required to control extended signal projection.

The analysis demonstrates that the Golden Bough rooftop cannot simultaneously achieve controlled projection and sufficient uplink margin within the documented service gap area. When configured for reach, the rooftop projects substantial signal energy beyond the intended service area. When adjusted to limit projection through increased downtilt, localized coverage performance is reduced. In addition, rooftop installation constraints necessitate directional antenna configurations inconsistent with the coordinated small-cell deployment architecture established for this area.

Collectively, these findings indicate that while the Golden Bough rooftop may produce modeled signal under certain configurations, it does not represent a technologically feasible alternative for achieving the documented service objectives under consistent engineering criteria.

2. Background and Prior Engineering Record

This supplemental report builds upon the original Radio Frequency Engineering Report and subsequent technical submissions previously provided in support of the proposed small wireless facility.

2.1 Initial Engineering Evaluation

The original RF Engineering Report documented a localized service deficiency within the subject residential coastal area through calibrated drive testing and propagation modeling. The evaluation included:

- Measured RSRP and SINR data collected using industry-standard testing equipment;
- Analysis of both low-band and mid-band performance;
- Assessment of in-building service capability based on uplink-constrained design assumptions; and
- Identification of a defined service area requiring densification to support reliable mid-band service.

The findings demonstrated substandard performance within portions of the neighborhood, particularly with respect to indoor service reliability and mid-band capacity objectives.

The proposed small wireless facility was engineered to operate as part of a coordinated small-cell deployment strategy intended to provide proximity-based coverage and complete the intended node spacing geometry.

2.2 Subsequent Technical Supplements

Following initial review and public proceedings, additional supplemental analyses were prepared to respond to questions raised by the city and members of the public. These submissions addressed, among other topics:

- Clarification of mid-band performance characteristics, including C-Band deployment considerations;
- Technical background and need for the proposed small cell;
- Establishing the importance of a dominant signal and a controlled RF design;
- Expanded propagation modeling reflecting consistent engineering assumptions;
- Clarification regarding the operational status and coverage contribution of previously approved small-cell nodes; and
- Expanded Golden Bough engineering analysis addressing spatial positioning, proximity to the service area, antenna deployment constraints, and observed field conditions to evaluate whether the rooftop can achieve the identified service objectives under consistent engineering assumptions relative to the proposed small cell.

These supplements maintained consistent modeling methodology and applied identical propagation assumptions to ensure objective comparison across candidate locations.

2.3 City Determination and Identification of Alternate Location

In its decision, the city determined that the Golden Bough rooftop may represent a less intrusive alternative location capable of addressing the documented service deficiency.

The City's determination was based primarily on the assumption that signal could be produced from the rooftop location. The engineering question therefore becomes not whether signal can be generated, but whether the Golden Bough rooftop can represent a technologically feasible facility consistent with the established small-cell network design framework.

2.4 Purpose of This Supplemental Evaluation

Following the City's determination, additional engineering evaluation was conducted to assess the Golden Bough rooftop under realistic deployment conditions. This expanded analysis includes:

- Comparative AWS path loss modeling using an uplink-limited MAPL threshold;
- Antenna configuration and rooftop deployment constraint evaluation;
- Line-of-sight (LOS) profile and extended propagation assessment;
- Electrical downtilt tradeoff analysis; and
- Comparative signal behavior evaluation relative to the proposed small cell.

This report presents the results of that expanded analysis and evaluates the Golden Bough rooftop against established wireless engineering principles governing proximity, link balance, architectural consistency, and operational reliability.

3. Engineering Standard for Evaluating Alternatives

The evaluation of candidate wireless facility locations must be grounded in established radio frequency engineering principles and system-level network design methodology. The objective is not simply to determine whether measurable signal can be produced from a location, but whether that location can reliably achieve the defined service objectives under reasonably expected operating conditions.

Wireless networks are engineered as integrated systems. Accordingly, alternative locations must be assessed based on their ability to function within the intended network architecture and achieve the identified service objectives under consistent engineering criteria.

Sound engineering practice requires that candidate sites be evaluated using consistent modeling assumptions and objective performance criteria, including:

- Proximity to the area requiring service;
- Alignment with the planned small-cell deployment geometry;
- Compatibility with the intended antenna configuration and facility type;
- Ability to maintain balanced two-way communication under uplink-limited design conditions;
- Availability of sufficient link margin to tolerate normal environmental and operational variability; and
- Deployment conditions that are predictable and operationally controllable over time.

The presence of modeled signal alone does not establish technical viability. Engineering viability is determined by whether a location can deliver reliable, balanced service performance consistent with network design objectives, including in-building service requirements.

Mid-band spectrum deployments, including AWS and C-Band, are particularly sensitive to transmission distance, clutter, and indoor attenuation. As a result, such deployments typically rely on proximity-based small-cell architecture to maintain link balance and predictable performance. Facilities that rely primarily on extended transmission distance or materially different antenna configurations may produce signal; however, they do not necessarily satisfy the deployment and performance criteria governing the coordinated small-cell system.

In evaluating the Golden Bough rooftop, the same propagation models, terrain data, and uplink-limited maximum allowable path loss (MAPL) threshold were applied consistently across all scenarios to ensure objective comparison. The analysis therefore focuses on whether the rooftop can satisfy the above engineering criteria relative to the proposed small cell.

This engineering standard provides the framework through which the Golden Bough rooftop is evaluated in the sections that follow.

4. Small Cell Network Design and Deployment Framework

The proposed facility is part of a coordinated small-cell deployment strategy intended to address a localized service deficiency within a residential coastal environment characterized by varied terrain, closely spaced homes, and mid-band propagation sensitivity.

4.1 Proximity-Based Coverage Design

Mid-band spectrum, including AWS and C-Band, provides higher spectral efficiency and greater user throughput capability than low-band frequencies. While low-band spectrum offers broader coverage reach, it is not well-suited for delivering sustained high data rates or improved signal quality in residential environments.

In the subject area, the service deficiency is characterized not by sector loading or congestion, but by the absence of a dominant serving mid-band layer and suboptimal SINR performance on low-band carriers. Deployment of AWS and C-Band is therefore intended to improve signal dominance, enhance SINR, and increase achievable user throughput, particularly for in-building service.

Proximity-based deployment reduces transmission distance between the antenna and end user, increasing available link margin and improving tolerance for indoor penetration loss, terrain variation, and routine environmental variability.

The proposed facility was engineered to operate within this proximity-based framework.

4.2 Deployment Architecture Selected for the Subject Area

Verizon has selected a proximity-based small-cell deployment architecture for this residential coastal area as the appropriate technical method for introducing and densifying mid-band services, including AWS and C-Band.

This architectural approach reflects Verizon's network design standards for residential environments where:

- Mid-band performance objectives require reduced transmission distance;
- In-building service reliability is a defined performance goal; and
- Coordinated node spacing is necessary to maintain balanced link conditions.

The proposed facility is engineered as one component of this coordinated small-cell system. Site selection, antenna configuration, and modeled performance were developed within this architectural framework.

Alternative locations must therefore be evaluated not solely on whether signal can be generated, but on whether they can function within the selected small-cell deployment architecture and achieve comparable service performance under the same design principles.

4.3 Coordinated Node Spacing and Network Geometry

Effective small-cell networks are engineered through coordinated node placement such that each facility serves a defined localized coverage area while minimizing excessive overlap and unintended coverage gaps. In mid-band deployments, node placement is derived from link budget constraints, propagation behavior, and the need to position each facility in functional alignment with the area of service demand.

The proposed SF-001 node location aligns with previously approved small-cell facilities to complete the intended coverage geometry within the neighborhood. This coordinated spacing approach:

- Supports continuous localized service;
- Maintains predictable cell dominance;
- Reduces unnecessary long-range projection; and
- Preserves balanced uplink and downlink conditions.

Small-cell placement is highly location-sensitive. Even modest positional shifts can materially alter dominant serving boundaries, uplink margin, and in-building performance. Accordingly, node placement within the service gap area is intentional and derived from propagation modeling and link budget analysis rather than arbitrary siting preference.

Exhibit A, to follow, illustrates the relative positioning of existing, approved, proposed, and alternate facilities in relation to the documented mid-band deficiency gap area. The mid-band

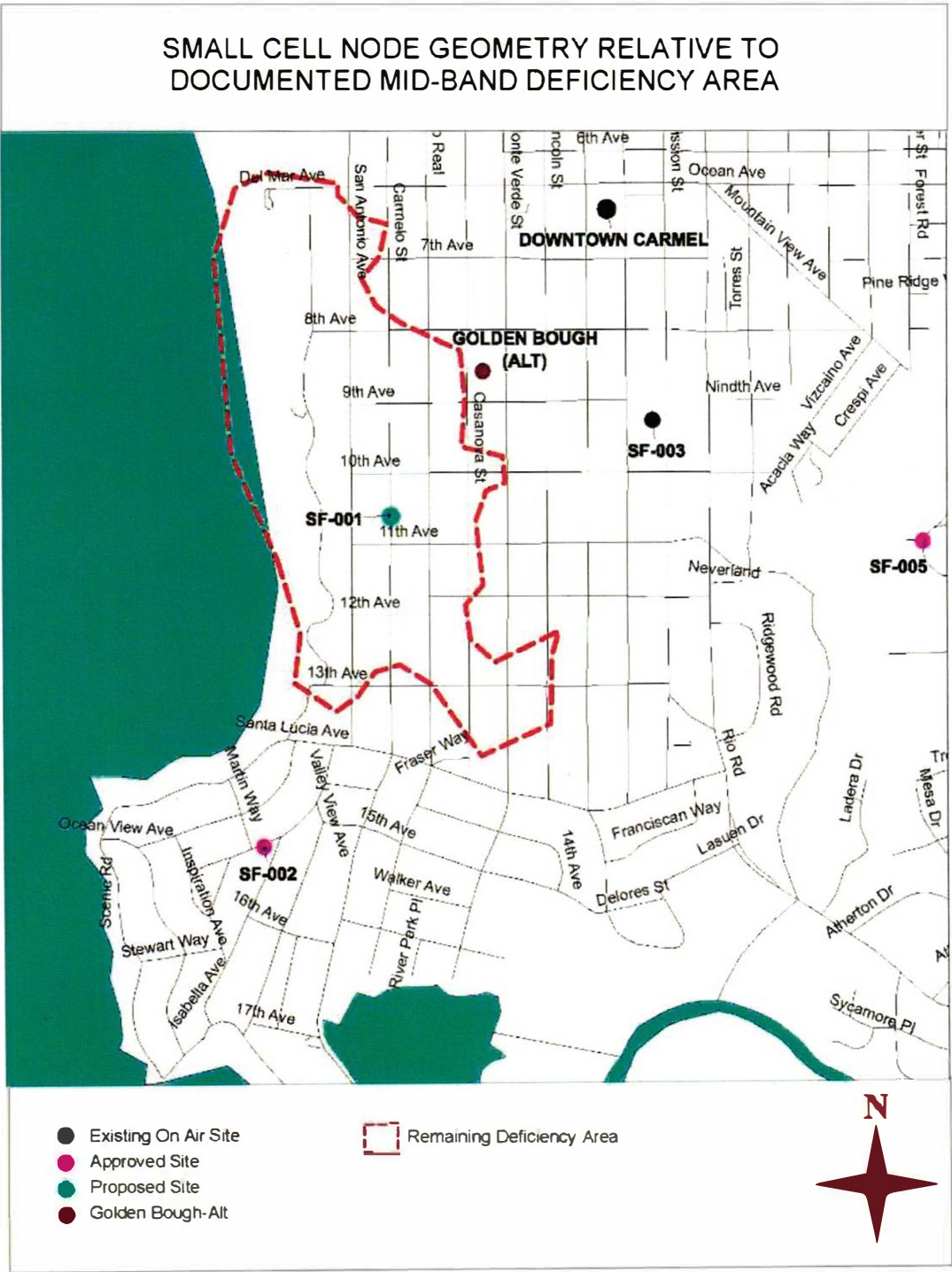
deficiency gap area is defined by the red-dashed polygon. The red-dashed polygon (gap area) was extrapolated by tracing the gap remaining after considering the wireless service contribution from the current on-air and planned facilities based upon the in-building drive test and coverage maps.

As shown in Exhibit A, the proposed SF-001 location occupies a central position within the identified deficiency gap area and maintains geometric alignment with previously approved nodes. The Golden Bough rooftop, while located within the broader neighborhood, is positioned toward the periphery of the deficiency gap area and nearer the edge of existing coverage dominance.

The relevant engineering consideration is whether the alternate location occupies a comparable geometric position within the service gap area sufficient to achieve the identified service objectives. The proposed SF-001 node was engineered to minimize transmission distance to the center of the documented deficiency gap area and to maintain balanced link conditions consistent with proximity-based small-cell architecture.

The Golden Bough rooftop does not occupy the same functional geometric position within the service gap area and would therefore operate under materially different transmission dynamics than the proposed node. Please refer to Exhibit A below for a graphical representation:

EXHIBIT A - SMALL CELL GEOMETRY



4.4 Balanced Two-Way Service and Uplink-Limited Design

Wireless networks operate as two-way communication systems. While downlink signal strength is often visually represented in propagation maps, system performance is typically constrained by the uplink due to the limited transmit power of user devices.

Accordingly, small-cell deployment for mid-band services is commonly designed using uplink-limited maximum allowable path (MAPL) loss thresholds to ensure balanced link conditions and consistent indoor performance.

The proposed facility was modeled using an uplink-limited MAPL of 127 dB, representing a conservative design condition intended to support reliable two-way communication, including in-building service.

This balanced-link design framework governs both node spacing and facility placement within the area of need.

4.5 Spatial Containment and Residential Deployment Objectives

In residential environments, small-cell installations are engineered to provide controlled, localized coverage rather than extended signal projection. Spatial containment is an important operational objective, as it:

- Limits unintended signal dominance beyond the intended service area;
- Reduces unnecessary handoff activity;
- Minimizes inter-cell overlap; and
- Supports predictable network behavior.

The proposed facility reflects these deployment objectives and is configured to provide localized mid-band service consistent with coordinated small-cell architecture.

4.6 Application to the Subject Area

The small-cell deployment plan for this neighborhood reflects:

- The documented service deficiency;
- The mid-band performance objectives of AWS and C-Band;
- The need for in-building reliability; and
- The geometric relationship between existing and approved facilities.

The proposed node location is therefore not arbitrary but is derived from link budget constraints, propagation behavior, and the need to complete the intended spacing geometry within the service gap area.

The sections that follow evaluate whether the Golden Bough rooftop can satisfy these same deployment and performance criteria.

5. Golden Bough Rooftop – Technical Evaluation

5.1 Evaluation Framework

Consistent with established radio frequency engineering practice, alternative wireless facility locations must be evaluated based on their ability to:

- Provide proximity-based coverage within the area requiring service;
- Operate within the intended small-cell network architecture;
- Maintain balanced two-way communication under uplink-limited design conditions;
- Provide sufficient link margin to tolerate normal environmental variability; and
- Function predictably under existing, controllable deployment conditions.

The following analysis evaluates the Golden Bough rooftop against these criteria.

5.2 Spatial Positioning Relative to the Service Gap

As illustrated in Exhibit A, the proposed SF-001 small cell occupies a central position within the documented mid-band deficiency gap area and aligns with the coordinated small-cell geometry established by previously approved nodes.

The Golden Bough rooftop, by contrast, is positioned toward the periphery of the deficiency gap area and nearer the edge of existing coverage dominance. Because it does not occupy the same geometric relationship to the service gap area, it would necessarily rely on greater transmission distance to reach portions of the documented gap.

Wireless performance is directly influenced by transmission distance. As separation between the antenna and end user increases, path loss increases and available link margin decreases. Facilities positioned outside the service gap area therefore operate with reduced tolerance for indoor attenuation, terrain variation, and normal environmental variability.

The question is not whether measurable signal can be generated from the rooftop, but whether it can provide the same proximity-based service performance as the proposed node under realistic operating conditions.

5.3 Rooftop Physical Constraints and Configuration Considerations

The Golden Bough rooftop presents physical and geometric constraints that preclude deployment of a true omnidirectional small-cell configuration. The sloped roof geometry, ridgeline obstruction, and mounting limitations restrict the ability to achieve uniform 360-degree radiation without pattern shadowing and structural interference. Furthermore, due to the Golden Bough's

location projecting coverage in the north, east, or south directions would conflict with coverage from the existing on-air facilities.

Accordingly, a sectorized rooftop configuration was modeled to approximate the gain and tilt characteristics of the proposed omnidirectional small-cell design while limiting radiation to feasible southwest and northwest sectors. This configuration represents the most favorable practicable approximation of small-cell performance achievable at the rooftop location.

The uplink-limited comparative modeling of this omni-equivalent configuration is presented in Section 5.5.

5.4 Interpretation of Uplink-Limited Path Loss Maps

The comparative modeling exhibits presented in this report utilize an uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB. Path loss represents the total signal attenuation between the base station and user device. Areas where modeled path loss exceeds 127 dB indicate insufficient uplink margin to reliably sustain communication under the applied design criteria.

The color scale applied in the exhibits reflects relative uplink margin with respect to the 127 dB threshold:

- Areas depicted with positive margin values represent locations where modeled path loss remains below the threshold and sufficient link margin is maintained.
- Areas depicted near 0 dB margin indicate minimal tolerance for additional attenuation, such as indoor penetration or terrain variability.
- Areas depicted with negative margin values represent locations where modeled path loss exceeds the allowable threshold and reliable uplink performance is not supported under the applied design assumptions.

All comparative exhibits utilize identical propagation parameters, clutter assumptions, antenna heights, and MAPL thresholds to ensure consistency and direct comparability between configurations.

5.5 Uplink-Limited Comparative Path Loss (Omni-Equivalent Evaluation)

To evaluate technological feasibility under balanced two-way communication conditions, a conservative uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB was applied uniformly across all modeling scenarios.

MAPL represents the maximum allowable signal attenuation between the base station and user device while maintaining reliable communication. The 127 dB threshold reflects an uplink-constrained design condition and incorporates appropriate margin to support in-building service objectives.

Exhibit B presents a side-by-side comparison of AWS path loss modeling for:

- The proposed SF-001 omnidirectional small-cell configuration; and
- The Golden Bough rooftop modeled using an omni-equivalent sectorized configuration.

Identical terrain, clutter, antenna height, and MAPL assumptions were applied in both scenarios.

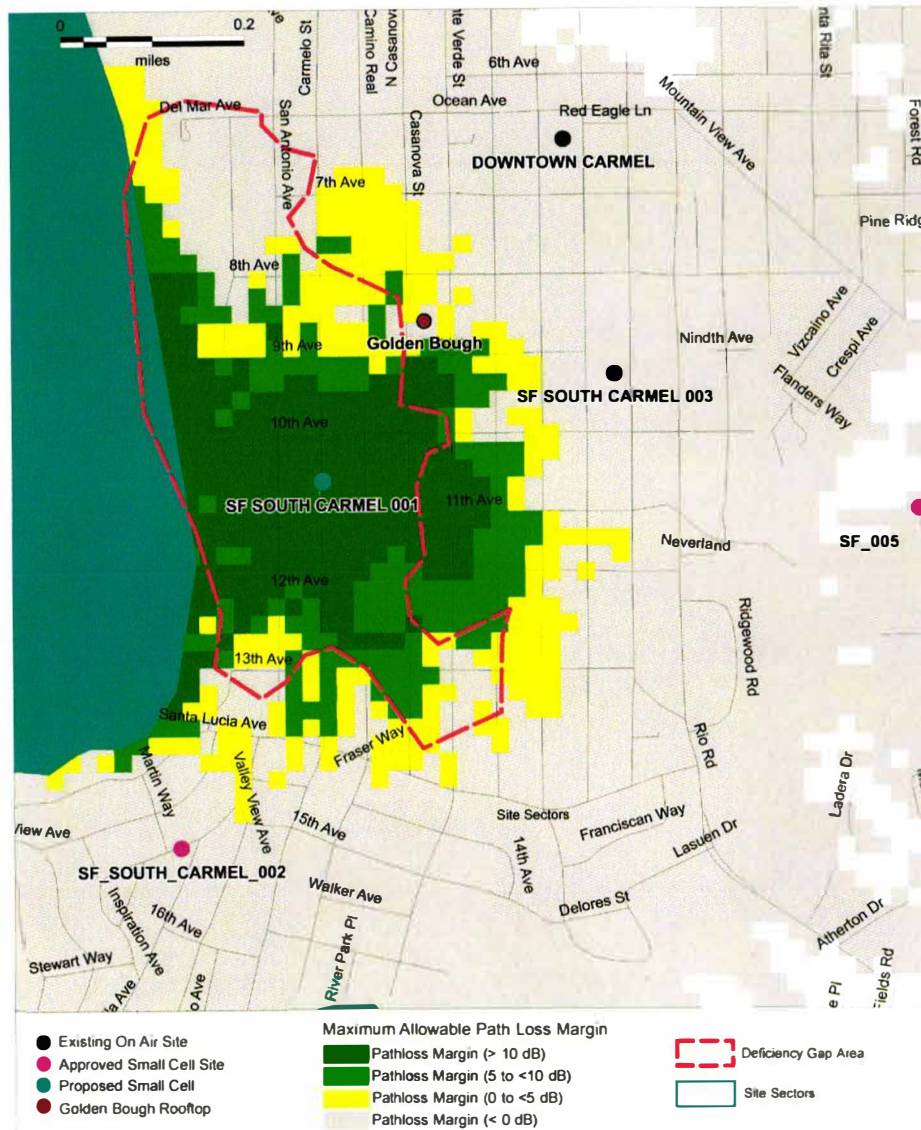
Under these consistent modeling conditions, the proposed small cell maintains positive uplink margin throughout the deficiency gap area. By contrast, the Golden Bough rooftop configuration exhibits predominantly sub-threshold performance (≤ 0 dB margin) across substantial portions of the documented deficiency gap area.

Areas operating at or below the MAPL threshold do not maintain usable uplink margin and therefore lack tolerance for indoor attenuation, terrain variability, and normal environmental fluctuation. As a result, the Golden Bough configuration does not sustain balanced two-way communication conditions within the deficiency gap area under uplink-limited evaluation.

The relevant engineering question is not whether isolated signal presence can be produced, but whether sufficient positive link margin is maintained to support predictable in-building performance. Based on the modeling reflected in Exhibit B, the Golden Bough rooftop does not maintain sufficient uplink margin to achieve the identified service objectives within the documented service gap area.

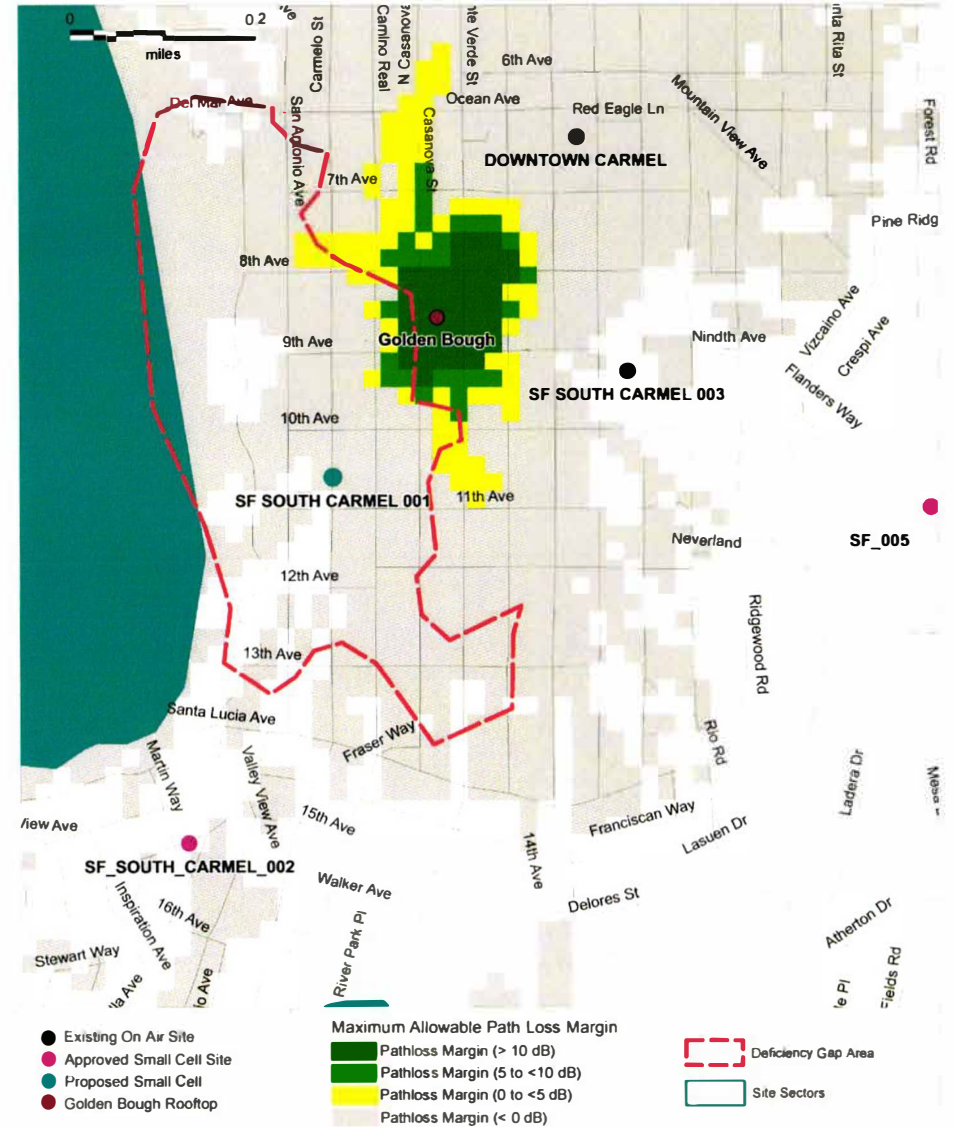
Comparable modeling under C-Band using identical assumptions demonstrates consistent relative behavior; therefore, redundant frequency-specific exhibits are not included.

Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



2/23/2026

Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration
Omni-Equivalent Gain and Tilt Parameters



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5.6 Long-Range Projection Characteristics – Golden Bough Rooftop

When modeled using a sectorized rooftop configuration with low electrical downtilt (0–2 degrees), the Golden Bough location exhibits extended line-of-sight propagation toward the northwest over open water.

Open-water paths introduce minimal clutter attenuation and therefore allow signals to propagate efficiently over extended distances. Under low-downtilt conditions, modeled signal strength persists well beyond the intended residential service area.

Extended projection of this nature is inconsistent with proximity-based small-cell design, which is intended to localize coverage within the immediate service gap area. Excessive projection increases the potential for:

- Unintended service area expansion;
- Overlapping coverage with distant cells; and
- Reduced control over dominant serving boundaries.

To limit long-range projection and concentrate coverage within the intended residential area, increased electrical downtilt is required.

Exhibit C presents a line-of-sight profile comparison of the Golden Bough rooftop under 2° and 8° electrical downtilt configurations, illustrating the corresponding change in propagation geometry.

Under a 2° electrical downtilt configuration, the antenna's upper radiation lobe projects outward at a shallow angle. In the northwest direction, there are no terrain obstructions and the signal travels over open water, where there is very little natural attenuation. As a result, free-space calculations incorporating antenna gain show that the signal level remains approximately –76 dBm at a distance of two miles from the rooftop.

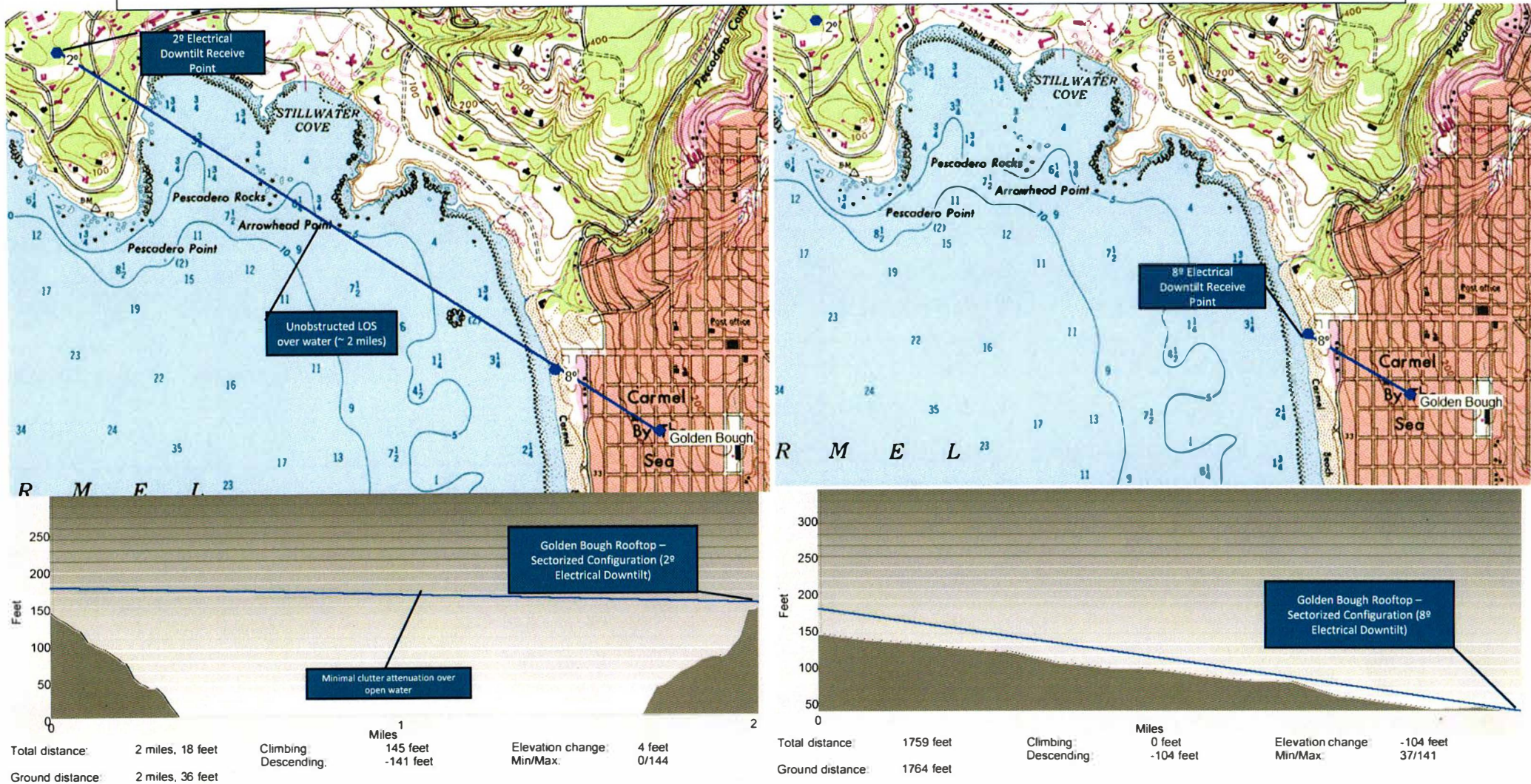
A signal at –76 dBm is strong enough to influence device selection and serving boundaries well beyond the intended residential service area. In practical terms, this means the rooftop would project energy far outside the localized service gap it is intended to address.

When electrical downtilt is increased to 8°, the signal at that same two-mile location drops to approximately –94 dBm; an 18 dB reduction. An 18 dB decrease represents more than a sixtyfold reduction in received signal power. While this higher downtilt improves containment of the signal and reduces extended projection, it does not uniformly improve localized coverage within the service gap area.

In this specific terrain environment, the Golden Bough rooftop is elevated relative to portions of the service area but not centrally positioned within it. Increasing downtilt redirects energy downward; however, due to the rooftop's position near the edge of the service gap and the downward terrain profile toward the water, portions of the service area fall outside the strongest portion of the vertical radiation pattern. This results in uneven margin and localized areas where uplink-limited performance remains constrained despite increased downtilt.

Accordingly, the Golden Bough rooftop presents a configuration tradeoff: lower downtilt produces excessive projection beyond the intended area, while higher downtilt improves containment but does not produce continuous positive margin throughout the documented service gap under the applied design criteria.

Exhibit C – Line-of-Sight Profile – Golden Bough Rooftop – Electrical Downtilt Sensitivity (2° vs. 8°)



Golden Bough Rooftop (2° Downtilt Configuration)
Unobstructed Over-Water Propagation Path (~ 2 Miles)

Golden Bough Rooftop (8° Downtilt Configuration)
Reduced Long-Range Projection; Localized Ground Intercept

5.7 Antenna Downtilt Sensitivity – Uplink-Limited Performance Impact

To quantify the service impact of downtilt selection, additional uplink-limited path loss modeling was performed for the Golden Bough rooftop under two electrical downtilt conditions: 2° and 8°, using identical MAPL (127 dB) assumptions and propagation parameters.

Under 2° electrical downtilt, extended propagation persists toward the northwest, consistent with the geometric behavior described in Section 5.6. While measurable signal is present within portions of the service area, the configuration does not maintain positive uplink margin within the central portion of the documented deficiency service gap area.

Specifically, the area where drive testing previously measured degraded SINR values corresponds to modeled path loss exceeding the 127 dB uplink-limited threshold, resulting in <0 dB margin. In such conditions, the Golden Bough configuration would not be expected to establish a dominant serving signal within that portion of the service gap area.

Under 8° electrical downtilt, long-range projection toward the northwest is reduced, and modeled signal containment improves relative to the 2° configuration. However, uplink-limited modeling indicates that margin within portions of the central deficiency service gap area remains constrained.

Specifically, while certain areas previously modeled below threshold under the 2° configuration improve slightly, the resulting uplink margin within much of the service gap area is limited to approximately 0 to <5 dB. Margin within this range provides minimal tolerance for indoor attenuation, terrain variability, or routine environmental fluctuation and may not establish a consistently dominant serving condition.

In addition, modeling along portions south of 11th Avenue up to the southern edge of the deficiency area indicates path loss exceeding the 127 dB threshold, resulting in negative uplink margin in those locations. Such conditions suggest that even with increased downtilt, the Golden Bough rooftop configuration does not provide continuous positive margin throughout the intended service gap area and may require additional network densification to address remaining sub-threshold areas.

Exhibits D and E present the comparative uplink-limited path loss results for the Golden Bough rooftop under 2° and 8° electrical downtilt configurations.

In addition to the modeled geometric and uplink-margin limitations, field inspection confirms the presence of mature vegetation located within close proximity to the potential antenna mounting area in the southwestern direction on the Golden Bough rooftop. The propagation modeling performed herein utilized standard clutter assumptions and did not incorporate discrete near-field foliage obstruction at the antenna aperture.

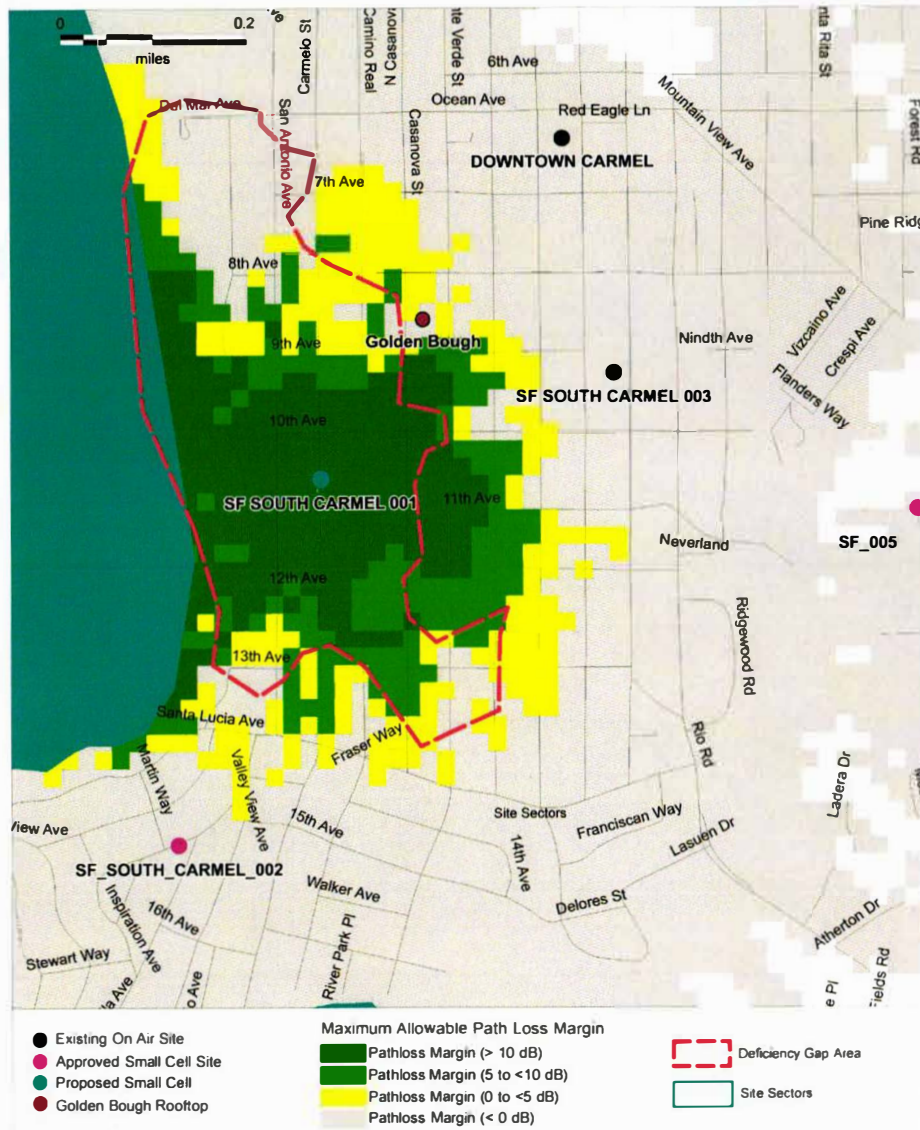
Close-in vegetation within the primary radiation path can introduce additional attenuation, multipath variability, and time-varying signal fluctuation that are not fully captured in

generalized propagation modeling. Even with selective tree trimming, residual foliage and seasonal regrowth may materially affect signal stability in the immediate service direction.

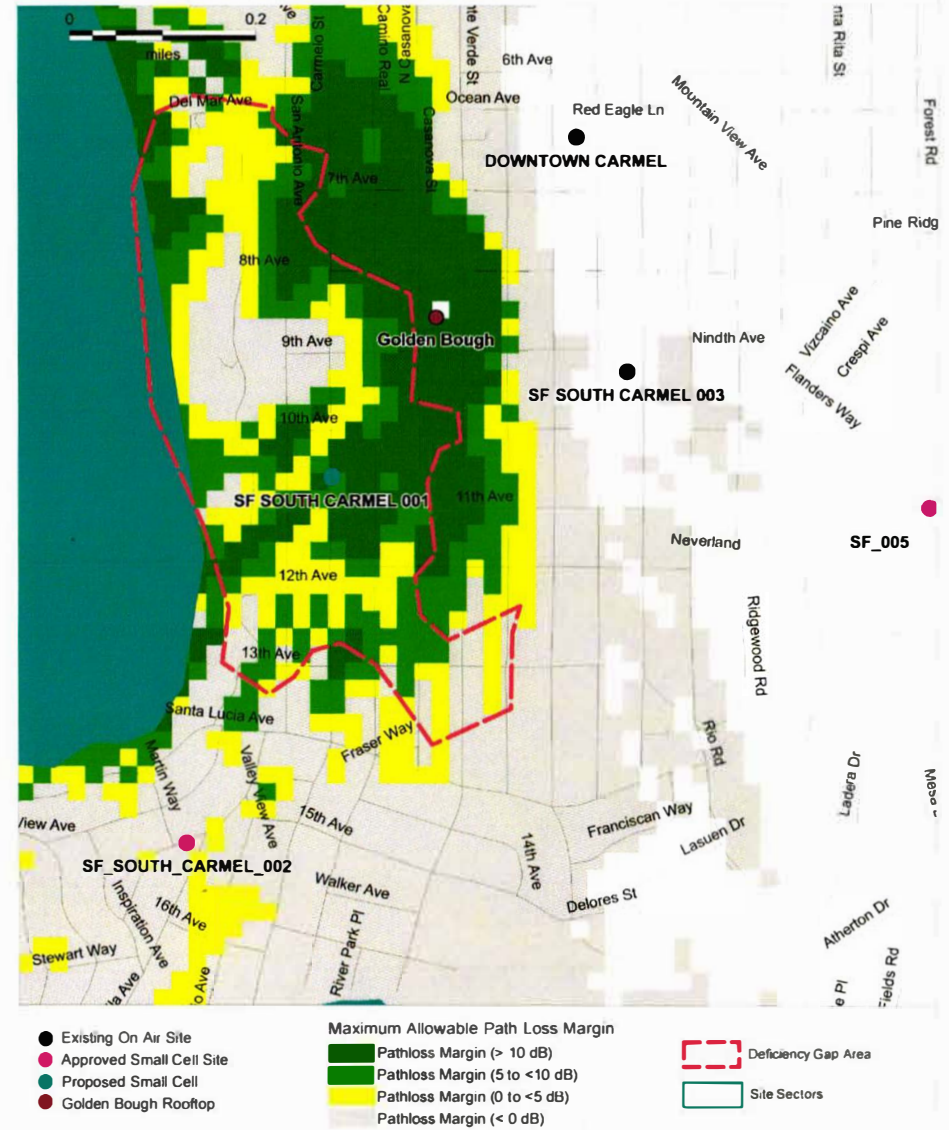
Accordingly, real-world performance from the Golden Bough rooftop would reasonably be expected to be more variable than reflected in the idealized modeling results presented above.

The modeling demonstrates that tilt adjustment at the Golden Bough location produces a performance tradeoff: lower tilt results in extended projection, while higher tilt reduces projection but does not simultaneously achieve controlled projection and continuous positive uplink margin across the documented service gap area.

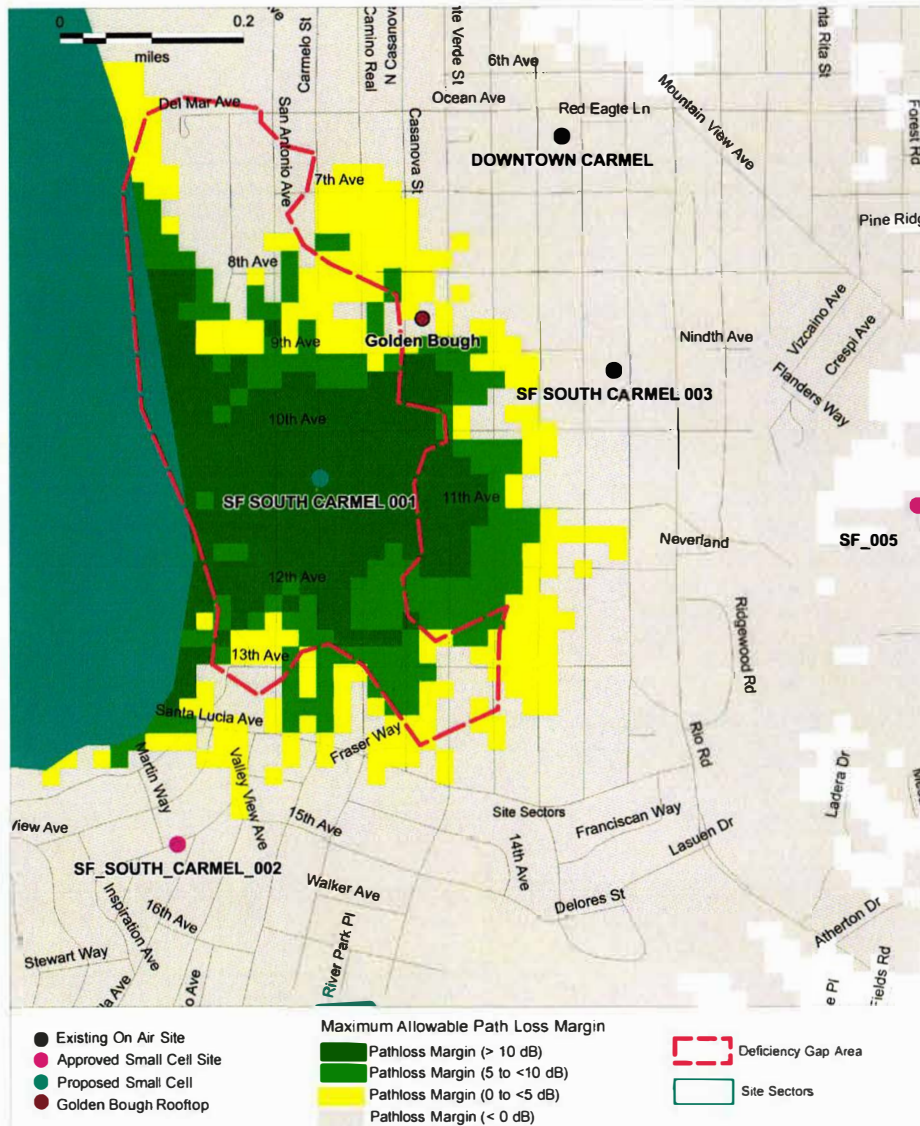
Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



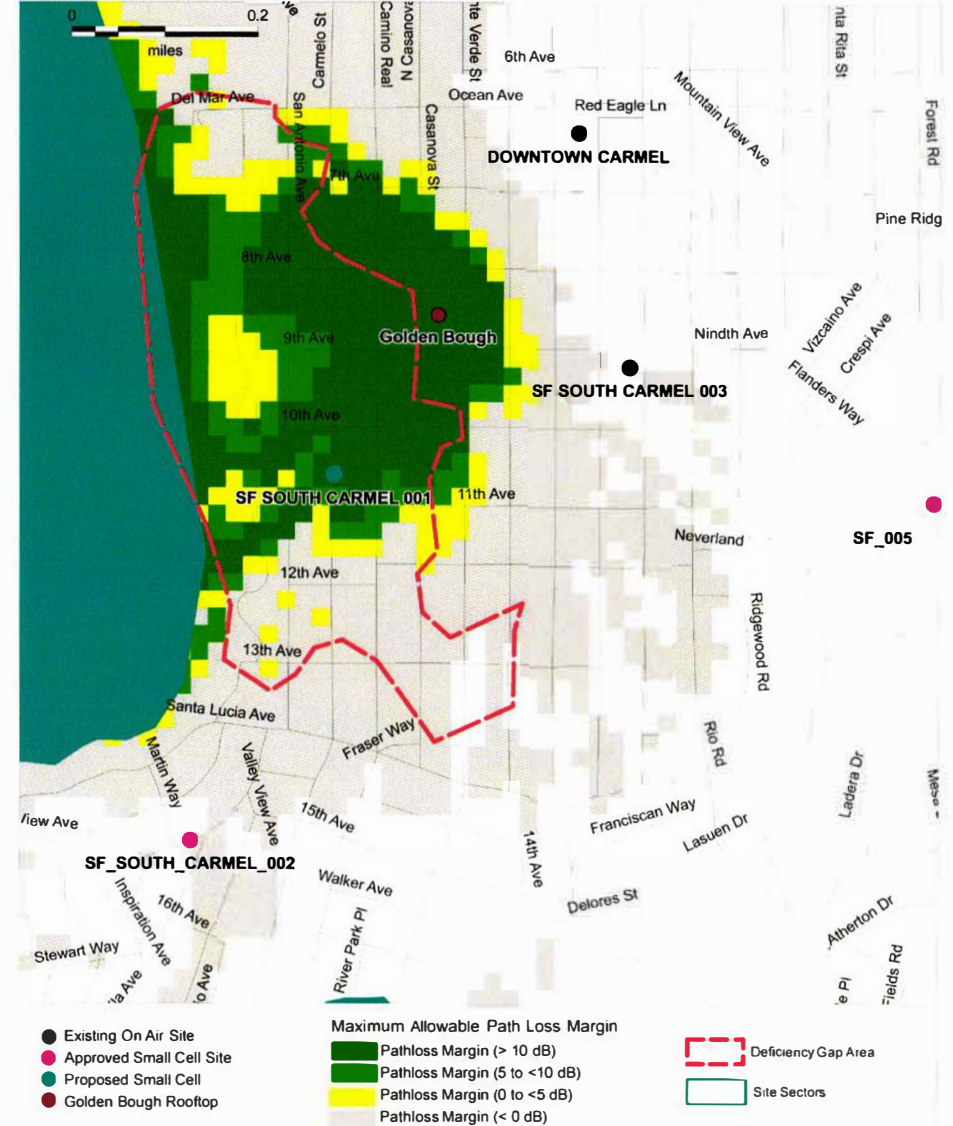
Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration - 2° Electrical Downtilt



Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration - 8° Electrical Downtilt



5.8 Comparative Configuration Summary

The following table summarizes the comparative modeling results under identical uplink-limited MAPL (127 dB) assumptions and consistent propagation parameters.

Evaluation Criterion	Proposed Small Cell (SF-001)	Golden Bough – Omni-Equivalent	Golden Bough – 2° Electrical Downtilt	Golden Bough – 8° Electrical Downtilt
Located within documented service gap area	Yes	No	No	No
Proximity-based coverage geometry	Yes	No	No	No
Maintains positive uplink margin across service gap area	Yes	No	No	No (service gap area margin limited to 0–<5 dB in central zone)
Central deficiency area margin	Positive	<0 dB (majority of service gap area)	<0 dB	0–<5 dB
Southern / 11th Ave margin	Positive	<0 dB	0–<5 dB	<0 dB
Long-range projection behavior	Localized	Limited coverage	Extended	Reduced
Sensitivity to downtilt adjustment	Low	N/A	High	High
Near-field vegetation influence	Minimal	Present	Present	Present
Indicates need for additional densification	No	Yes	Yes	Yes

5.9 Summary of Golden Bough Technical Evaluation

The expanded modeling and field evaluation demonstrate that the Golden Bough rooftop is constrained by geometric separation, configuration sensitivity, and physical site conditions that materially limit its ability to achieve the identified service objectives.

The rooftop is positioned outside the documented service gap area and therefore must rely on transmission distance rather than proximity-based coverage to serve the central service gap area.

Under an omni-equivalent configuration evaluated using a conservative uplink-limited MAPL threshold of 127 dB, modeling indicates that positive uplink margin is not maintained throughout the central deficiency area.

When configured with low electrical downtilt (2°), the rooftop produces extended line-of-sight projection over open water while still failing to establish consistent positive margin within the central portion of the documented service gap. Increasing electrical downtilt (8°) reduces long-range projection; however, uplink margin within the service gap area becomes constrained to minimal levels (approximately 0 to <5 dB), and certain portions of the southern and eastern service area remain below threshold.

The modeling therefore reflects a configuration sensitivity in which reduced projection and adequate margin cannot be simultaneously achieved from the Golden Bough location under consistent uplink-limited design assumptions.

By contrast, the proposed SF-001 small-cell configuration is positioned within the service gap area and maintains positive uplink margin throughout the documented deficiency area without reliance on extended projection or aggressive downtilt adjustment.

Based on uniform modeling assumptions and consistent application of uplink-limited performance criteria, the engineering record does not support the Golden Bough rooftop as a technologically feasible alternative for achieving the documented service objectives within the identified deficiency area.

6. Conclusion

This supplemental evaluation applied uniform uplink-limited modeling criteria (127 dB MAPL), consistent propagation assumptions, and documented field conditions to assess whether the Golden Bough rooftop represents a technologically feasible alternative.

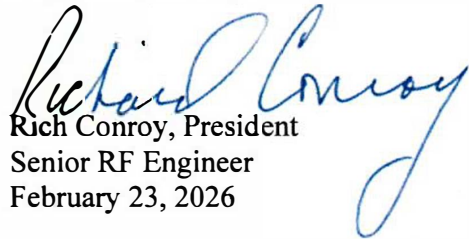
Under all evaluated configurations—including omni-equivalent, 2° electrical downtilt, and 8° electrical downtilt—the Golden Bough location does not maintain continuous positive uplink margin across the documented service gap area. Low-downtilt configurations result in extended projection beyond the intended residential area while failing to remediate the central deficiency zone. Increased downtilt reduces projection but constrains uplink margin within the service gap area and leaves portions of the southern service area below threshold.

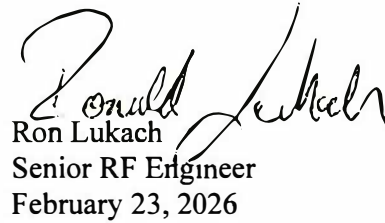
The modeling further reflects configuration sensitivity and geometric limitations inherent to the rooftop's position outside the service gap area. These constraints are not attributable to tunable parameters but to spatial separation and physical site conditions, including near-field vegetation.

By contrast, the proposed SF-001 small-cell facility is positioned within the documented service gap area and maintains positive uplink margin under the same modeling assumptions without reliance on extended projection or aggressive downtilt adjustment.

Based on consistent engineering criteria and comparative analysis, the Golden Bough rooftop does not represent a technologically feasible alternative for achieving the identified service objectives to the identified deficiency area. The proposed SF-001 small-cell configuration remains the technically appropriate solution supported by the engineering record.

Report Prepared by:


Rich Conroy, President
Senior RF Engineer
February 23, 2026


Ron Lukach
Senior RF Engineer
February 23, 2026

7. Appendix - Propagation Parameters

Carmel 127 dB Pathloss Model Parameters				
Site	SF S Carmel 001	Golden Bough	Golden Bough	Golden Bough
Latitude	36.549322	36.551884	36.551884	36.551884
Longitude	-121.926922	-121.924606	-121.924606	-121.924606
Site AMSL (ft)	82.3	156.9	156.9	156.9
AGL CL (ft)	47	34	34	34
Antenna Model	Omni_10DT	CUUT070X06Fxyz	NHHSS-65C-HGT-R3B_02DT	NHHSS-65C-HGT-R3B_08DT
Antenna Type	Omni	Clover	Directional	Directional
E Downtilt (degrees)	10	10	2	8
Azimuth (degrees)	360	220 340	220 300	220 300
Gain (dBi)	8	14	19.4	19.4
HBW (deg)	360	77	62	62
VBW (deg)	20	15	4.7	4.7
Dimensions	29.8" H x 14.6" D	24" H x 14.6" D	96"H x 11.9" W x 7.1" D	96"H x 11.9" W x 7.1" D
Clutter	1 sec 2021 USGS tuned to drive test data			
Terrain	2016 30m			
Frequency (MHz)	2100			
Model	COST-231 Hata			
ERP (dBm)	51.3	51.3	59.8	59.8



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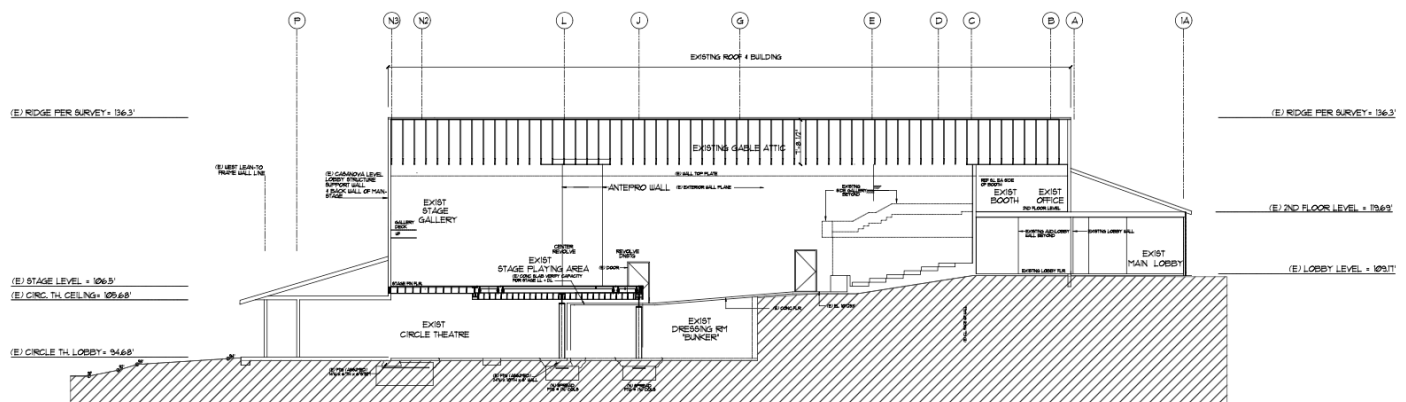
3 Compliance With FCC Radio Frequency Exposure Guidelines10

Summary of qualifications - Lee Afflerbach, P.E.17

1 Overview of the Golden Bough Playhouse Alternative Site

The alternative site to the Verizon proposed site is the Golden Bough Playhouse located on Monte Verde Street, between 8th and 9th Avenues. Because of the topology in that part of Carmel, the easternmost part of the building on Monte Verde Street has a height above mean sea level (AMSL) of 109.2 feet while the westernmost part of the building, bordering on Casanova Street, is 94.7 feet AMSL. That means that the peak of the western edge of the roof is approximately 42 feet above ground level in reference to Casanova Street and the easternmost part of the peak is roughly 27 feet above Monte Verde Street. Figure 1 shows the section view of the proposed facility from recent construction documents provided by RFM Architects who oversaw recent renovations at the Playhouse.

Figure 1: Golden Bough Playhouse Section



We are evaluating a proposal for Verizon to install the antennas and mounting structure in a faux chimney/smokestack with two wireless antennas at azimuths of 220 and 330 degrees along with four radios to support operation in Verizon's 1950, 2150 and 3750 MHz FCC licensed commercial wireless bands.

Figure 2 is a rendition of the proposed Verizon site with the faux chimney/smokestack antenna and radio system.

Figure 2: Golden Bough Playhouse Proposed Verizon Site



Figure 3 is a sketch of the antennas placed inside of the chimney. These antennas were selected based on information provided by Verizon in their analysis of using the Golden Bough Playhouse as an alternative site for constructing the new wireless facility. Verizon also provided the antenna bearing angles that we investigated in our study.

Figure 3: Top View of Antenna Canister

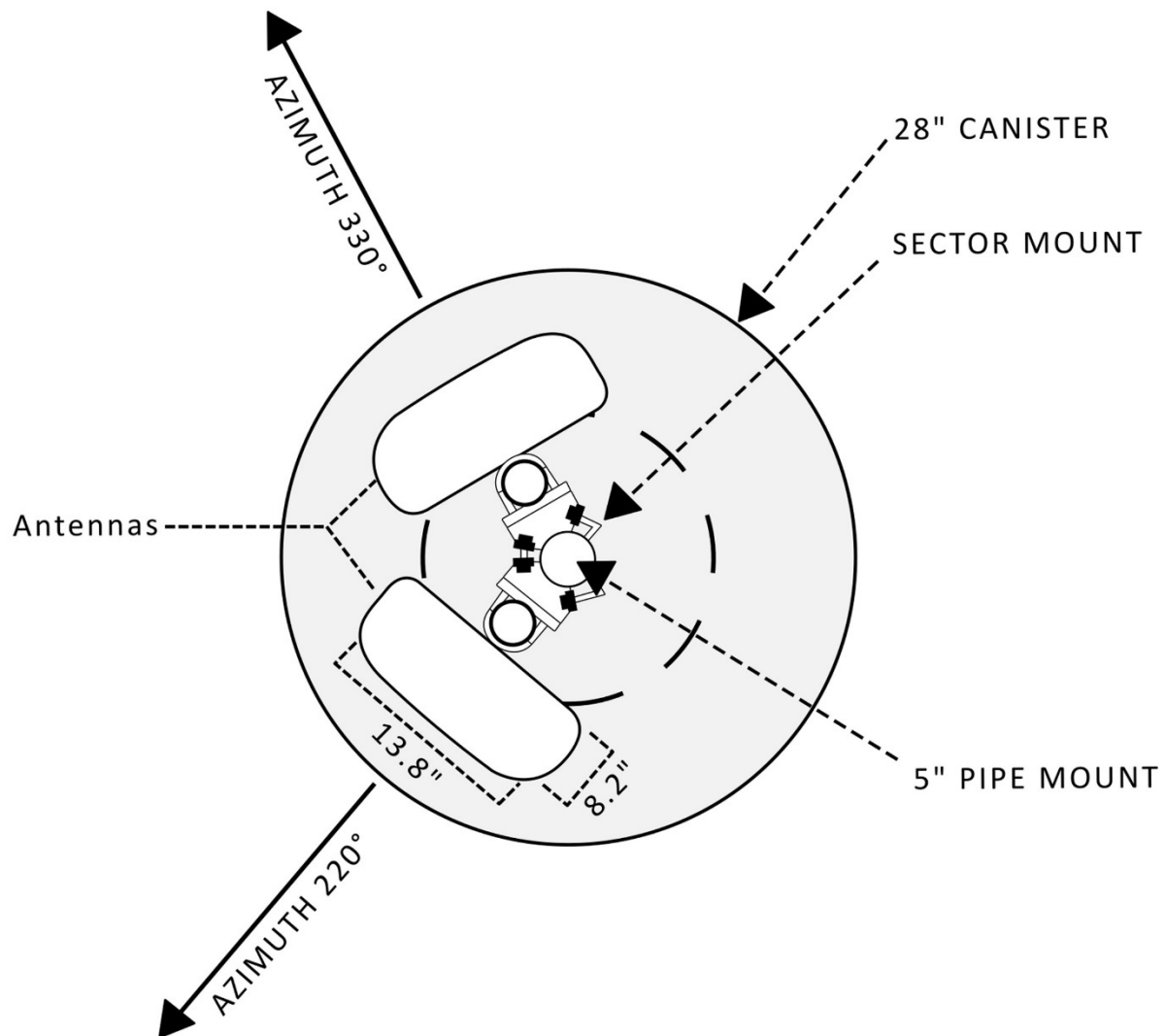
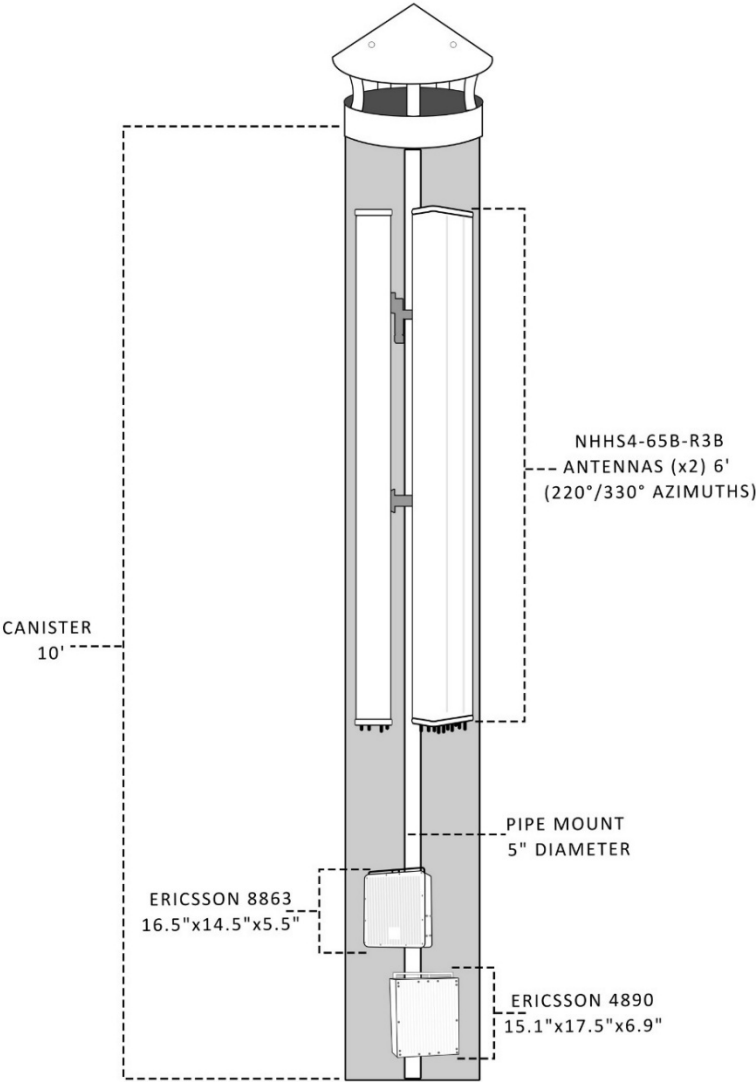


Figure 4 is a depiction of the radio and antenna equipment that would be installed in the canister. (For visual clarity, we omit the wiring and diplexers which connect the radios to the antennas). All other related wireless equipment would be installed within the building.

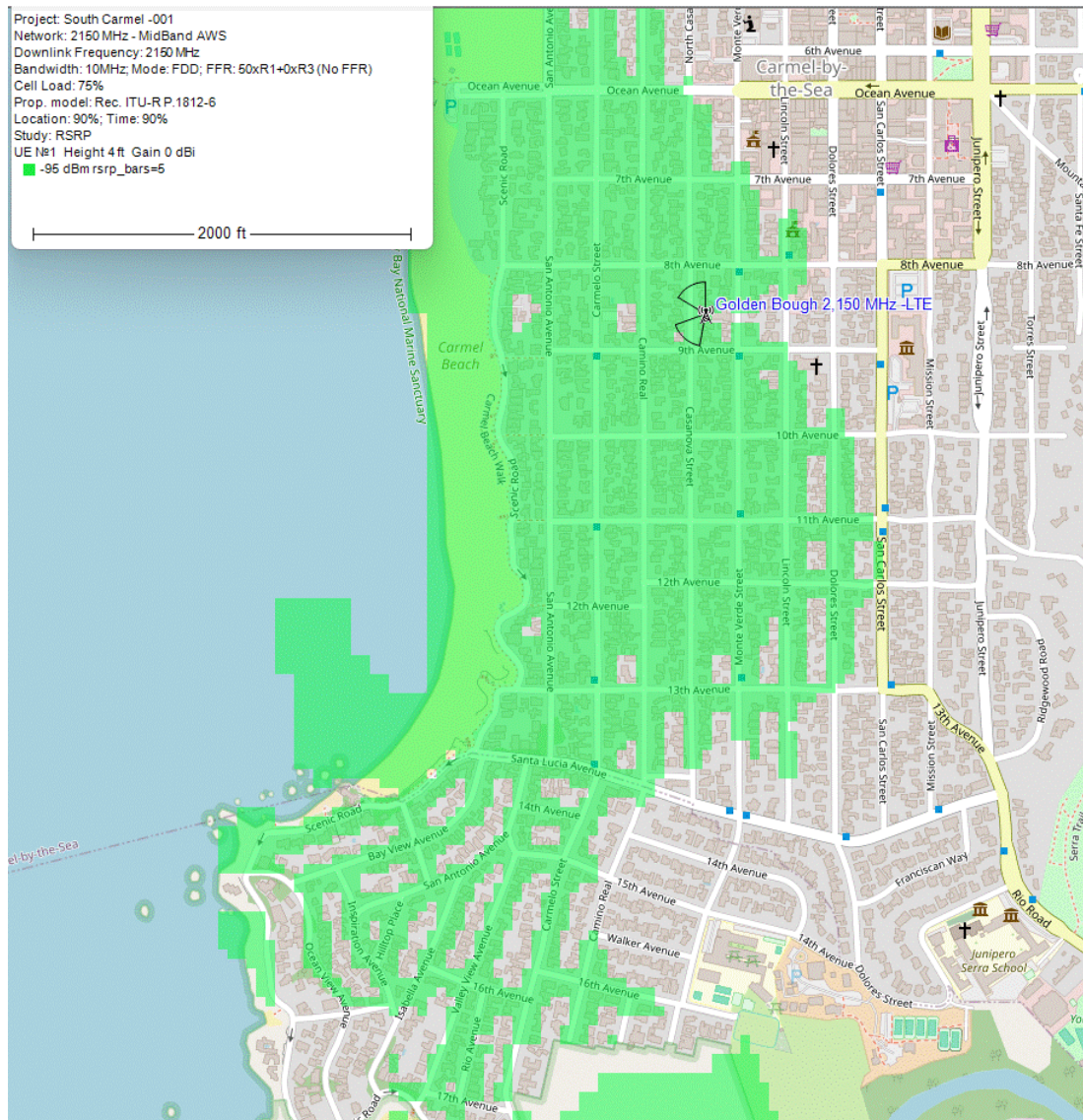
Figure 4: Simulated Cross-Section of Antenna Canister



2 Proposed Wireless Coverage

We have prepared computer-generated models of the anticipated coverage that will be provided from the Golden Bough Playhouse site for the three Verizon licensed wireless band proposed by Verizon in their original application. Figure 5 is a computer-generated plot of 2150 MHz mid-band coverage utilizing the propagation modeling defined by the International Telecommunications Union¹.

Figure 5: Computer Modeled Coverage 2150 MHz Verizon Wireless Mid-Band

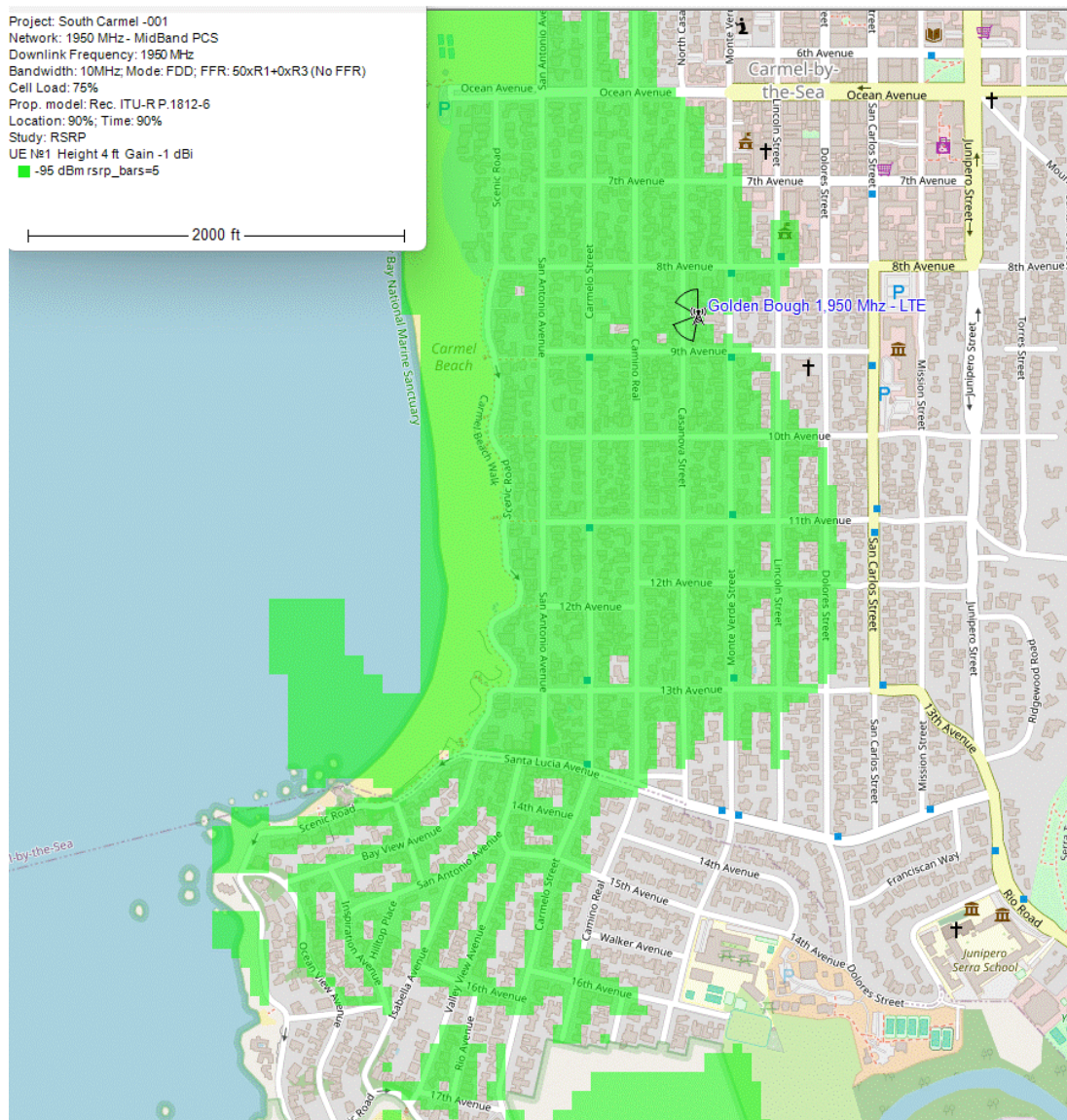


¹ Recommendation ITU-R P.1816-4 (08/2019) The prediction of the time and the spatial profile for broadband land mobile services using UHF and SHF bands P Series Radiowave propagation, International Telecommunications Union, Geneva, Switzerland

The green area plotted on the map represents the minimum signal level power level Verizon associates with reliable in-building services. The extended red and blue areas define areas that adjacent Verizon sites -95 coverage contours will receive co-frequency interference at the 5dB/10dB level.

Likewise, Figure 6 is a computer-generated plot of the 1950 MHz mid-band coverage using the same propagation modeling defined by the International Telecommunications Union.

Figure 6: Computer Modeled Coverage 3700 MHz Verizon Wireless Mid-Band



Obviously, it will still be necessary to determine the true impact of the nearby trees and foliage on the west side of the Playhouse to the mid-band signal propagation from the proposed antenna location. To that, we continue to recommend (as Deltaphase endorses in their submissions) that Verizon place a temporary antenna setup to simulate this proposed base station site. We also understand the City officials are willing to work with the Playhouse to trim existing trees on site and will also trim any trees if needed in the public right of way.

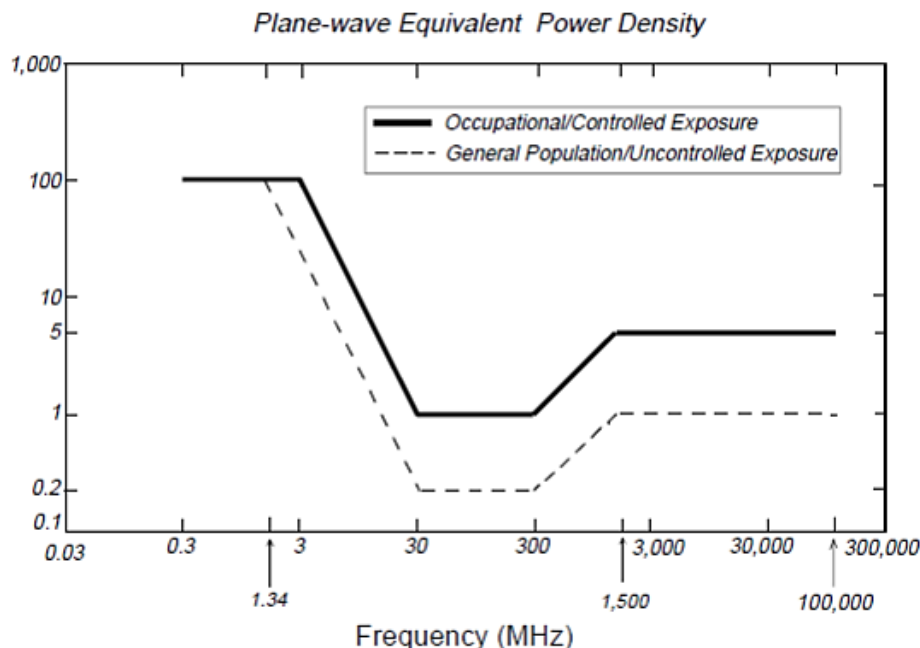
3 Compliance With FCC Radio Frequency Exposure Guidelines

The FCC's guidelines for evaluating human exposure to RF signals were first established in 1985. The current guidelines were adopted in August 1997 in FCC OET Bulletin 65.² The guidelines are expressed in terms of Maximum Permissible Exposure (MPE) to electric and magnetic field strength and power density. The guidelines, which cover the frequency range of 300 kHz to 100 GHz, address two separate tiers of exposure:

1. **Occupational/controlled** exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.
2. **General population/uncontrolled** exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure.

Figure 7 is a plot of MPE as a function of radiofrequency (RF) human exposure as a function of the frequency spectrum. Note that the spectrum between 30 and 300 MHz is the most restrictive. All commercial wireless networks operate in a spectrum above 600 MHz.

Figure 7: FCC Limits for Maximum Permissible Exposure



² "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields," OET Bulletin 65, edition 97-01. <https://www.fcc.gov/general/oet-bulletins-line#65>

We examined the specifications for the radio equipment proposed for this site. This information has been used to examine compliance with the FCC's guidelines for evaluating human exposure to RF signals as adopted in August 1997 in FCC OET Bulletin 65. We conclude that the proposal is fully compliant with FCC's limits of radiofrequency exposure.

Figure 8 is a Google Earth map depicting the maximum distance of radio frequency radiation exceeding FCC standards in the vicinity of the antennas with their radiation center at the height of 52' above ground level.

Figure 8: Area Near Antenna Radiation Center at 52' AGL Where RF Exposure Exceeds FCC General Public Limit

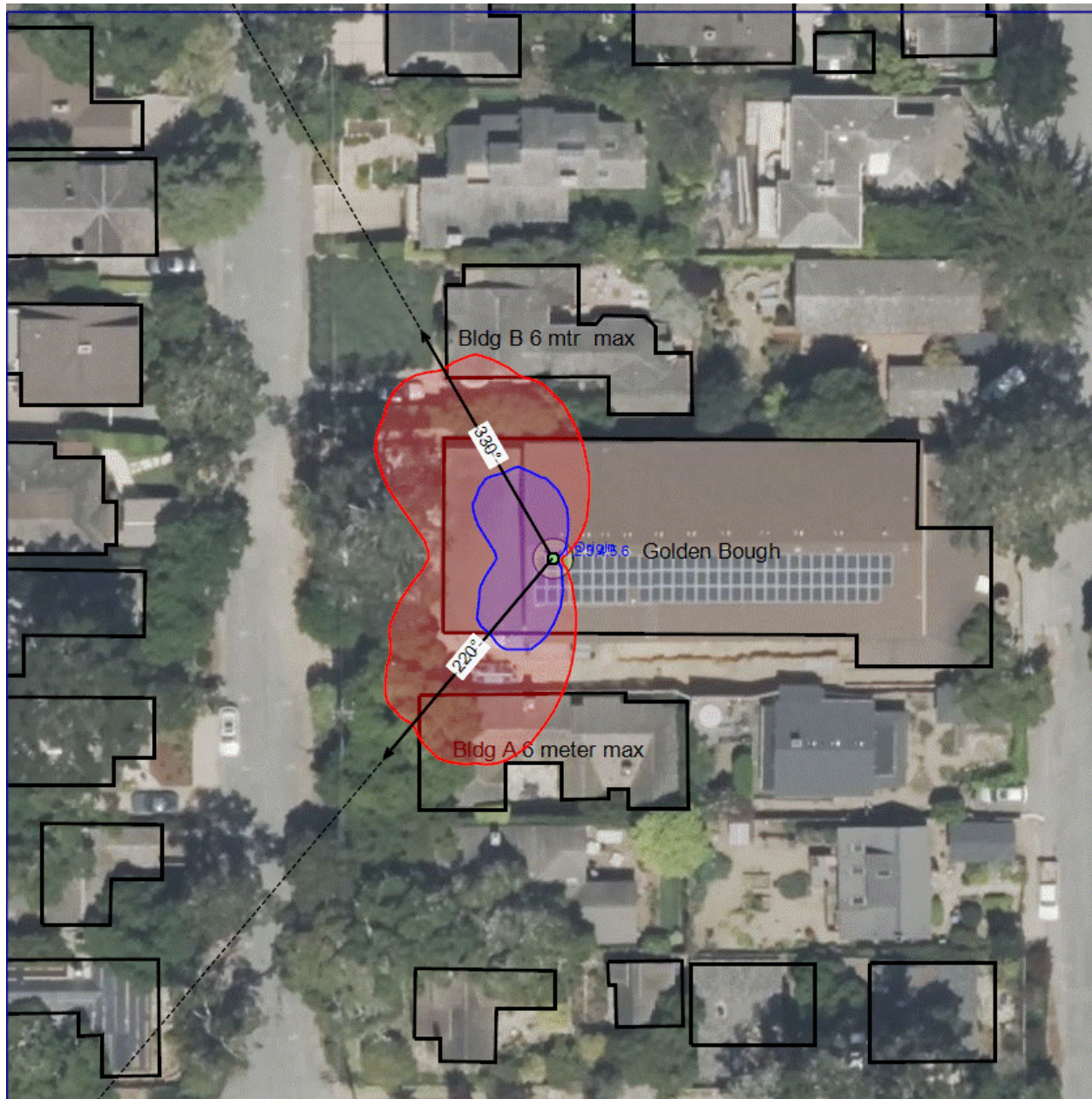
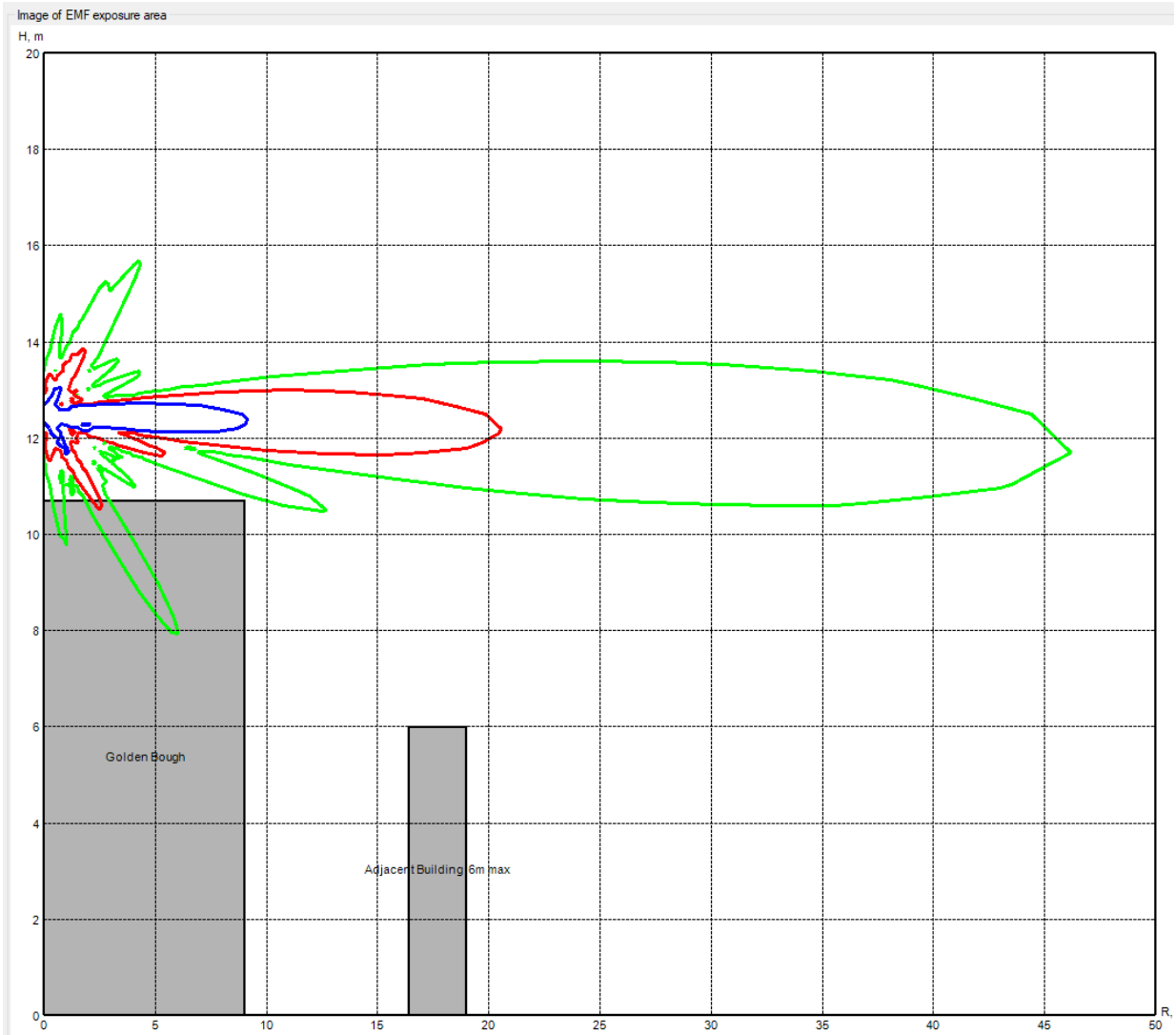


Figure 9 through Figure 12 are graphs which show an elevation depicting the maximum distance and heights (in meters) of radio frequency radiation in the vicinity of the antenna at the individual antenna with a radiation center of 52' at top of the at bearings of 220, 330, 0, and 180 degrees from the utility pole. The blue plot lines show the extent of the RF exposure for FCC occupational limit (trained communications and utility workers). The red lines show the extent of the RF exposure limits set by the FCC for the general public; the green lines show a very conservative RF exposure limit of 20% of the FCC general public, for comparison. The grey boxes are nearby buildings within the plane of each bearing for comparison. It is clear that none of the buildings-- even with a 2 meter (6-foot) tall person on top, comes close to the green lines that indicate only 20% of the general public RF exposure limit. Thus, the proposed wireless facility would clearly be compliant with the FCC Radio Exposure Guidelines.

Figure 9: RF Exposure Level Above Ground Level (Bearing 220 degrees)



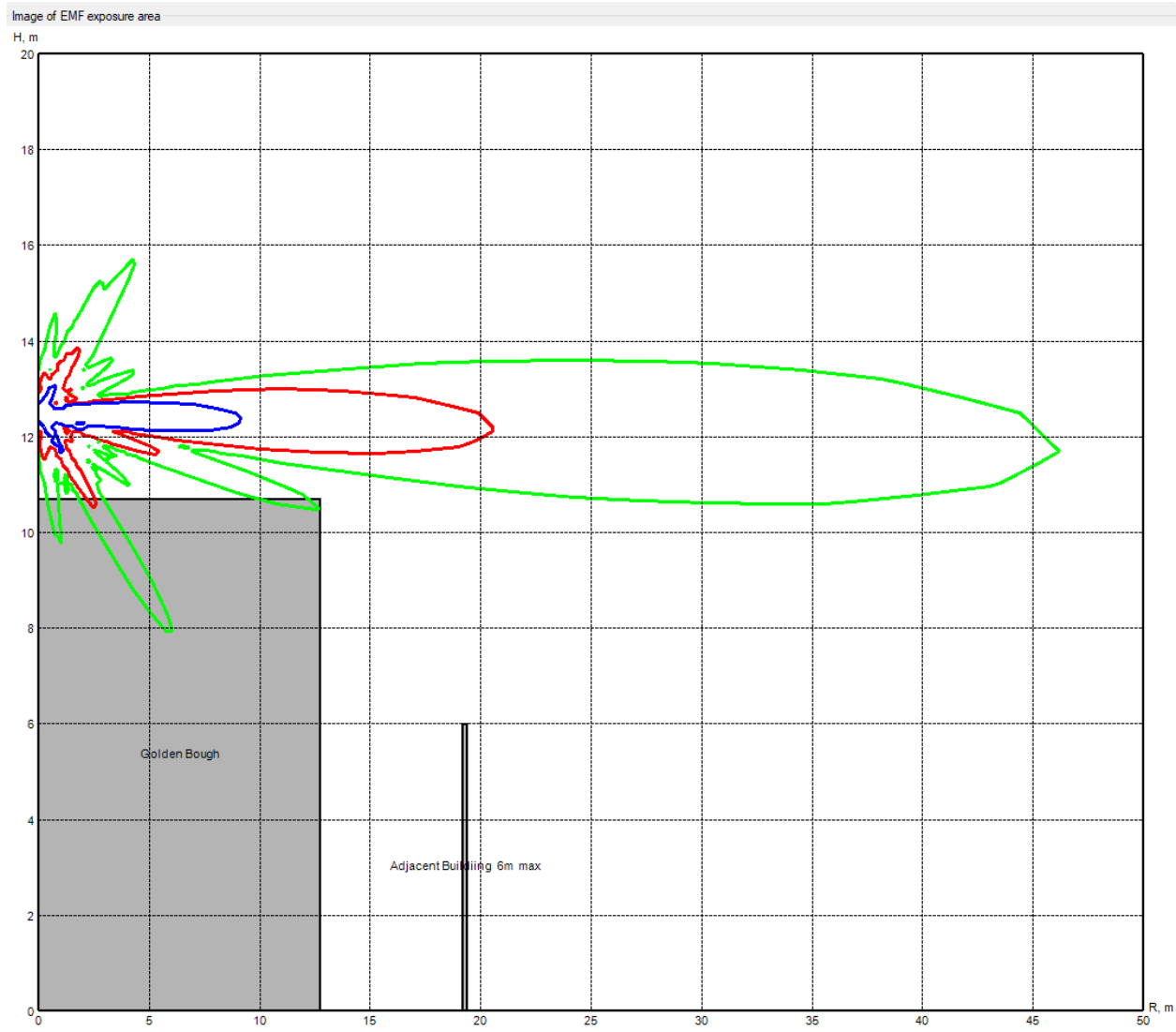
All Distances Measured in Meters

Blue – FCC Occupational Control Exposure Area

Red – 100% of FCC General Public Uncontrolled Exposure Area

Green – 20% of FCC General Public Uncontrolled Exposure Area

Figure 10: RF Exposure Level Above Ground Level (Bearing 330 degrees)



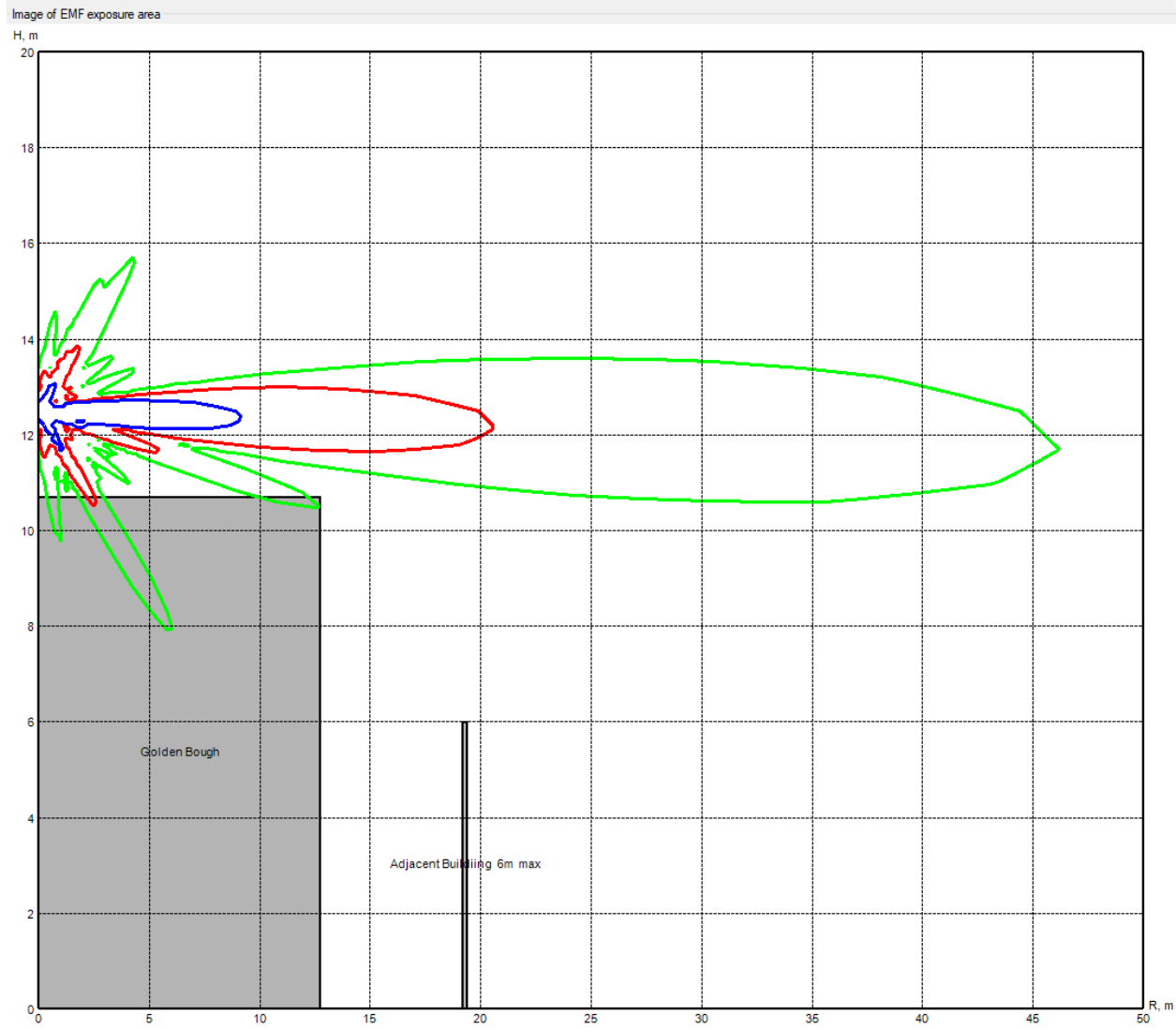
All Distances Measured in Meters

Blue – FCC Occupational Control Exposure Area

Red – 100% of FCC General Public Uncontrolled Exposure Area

Green – 20% of FCC General Public Uncontrolled Exposure Area

Figure 11: RF Exposure Level Above Ground Level (Bearing 0 degrees)



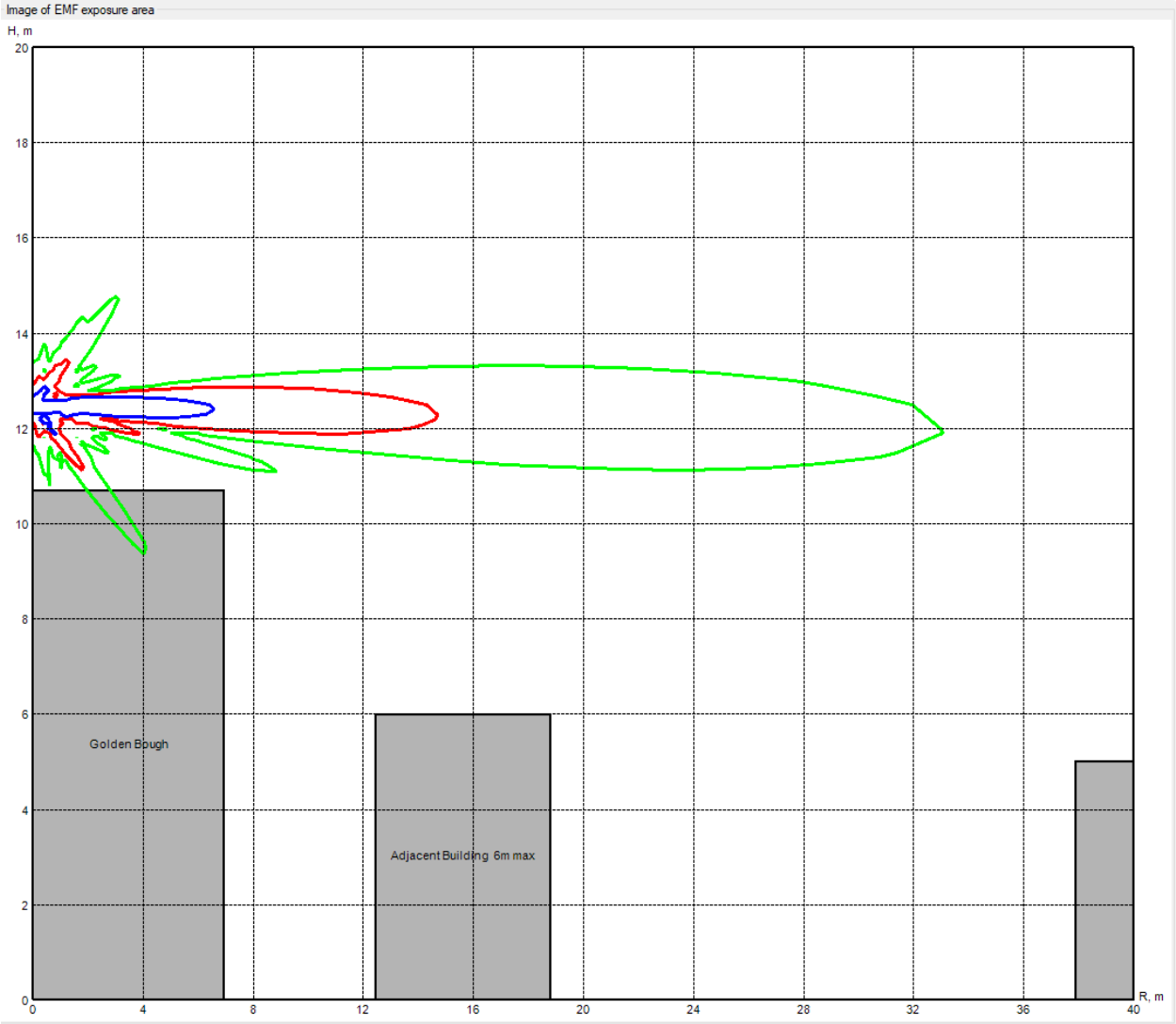
All Distances Measured in Meters

Blue – FCC Occupational Control Exposure Area

Red – 100% of FCC General Public Uncontrolled Exposure Area

Green – 20% of FCC General Public Uncontrolled Exposure Area

Figure 12: RF Exposure Level Above Ground Level (Bearing 180 degrees)



All Distances Measured in Meters

Blue – FCC Occupational Control Exposure Area

Red – 100% of FCC General Public Uncontrolled Exposure Area

Green – 20% of FCC General Public Uncontrolled Exposure Area

Summary of Qualifications - Lee Afflerbach, P.E. CTC Media Group – Project Manager

I am a communications systems engineer with more than 50 years of experience advising federal, state, and local government clients. I am the founder of Columbia Telecommunications Corporation, a firm that has delivered independent consulting services to federal, state, and local government clients since 1983.

My expertise covers a wide range of communications technologies, including urban 4/5G commercial wireless deployment, broadcasting facility design, and UHF/VHF public safety land mobile radio. My daily work involves radio frequency (RF) propagation modeling to determine the extent of coverage feasible from a given wireless facility siting; I also evaluate network capacity and examine alternative deployment strategies to address clients' needs.

Wireless siting expertise

For over two decades of experience assisting local government clients in reviewing and examining options for siting commercial wireless communications facilities consistent with local zoning codes and federal regulations. In this work, I routinely perform computer modeling to determine the extent of existing and proposed coverage for a wide range of commercial wireless applications prepared by commercial carriers. As part of these evaluations, when requested by the client, I identify and examine alternative locations for proposed sitings; in addition to meeting coverage requirements, these alternative sites are intended to address specific local government planning and zoning requirements.

I currently provide ongoing support to municipal clients evaluating options for deploying advanced cellular technology in their respective communities. I serve as CTC's project leader for the team of engineers who are examining or have recently examined deployment options for more than a dozen cities in California, including the cities of Arcadia, Campbell, Burlingame, Fremont, Hillsborough, Los Angeles, Los Altos, Monterey, Napa, Palo Alto, Palos Verdes Estates, Piedmont, Rancho Palos Verdes, and Sonoma. Over the past 20 years, I have reviewed several hundred site applications for both new and upgrades for wireless facilities for numerous ongoing municipal clients in the Washington DC and Baltimore metropolitan areas.

As a part of my support to local government clients, performed and supervised our technical team I review of wireless facilities applications, oversight of field signal verification measurements, negotiations of technical options/issues with carriers, expert witness testimony in litigation, and presentations before local planning commissions and city councils.

I have served as an expert witness providing testimony in support of municipal clients in their ongoing litigation with commercial wireless carriers in both State and Federal courts. My assignments have included the preparation of testimony and analysis of technical filings presented before the court by the cities of Wilmington, DE; Los Angeles, Los Altos, Hillsborough

and Piedmont, CA; Pueblo County, CO; Wichita, KS; McKinney, TX; and North Buffalo Township, PA. As directed by the courts in some of these disputes, I have supported numerous communities in preparing technical alternatives to wireless carriers' initial wireless facility siting applications.

Design and deployment of statewide broadband wireless network

I serve as CTC's project leader for managing the Delaware Department of Transportation's (DelDOT) statewide 4.9 GHz high capacity, sectorized SHF broadband wireless network. This network, with 20 core towers, interconnects the department's statewide traffic cameras, traffic signals, traffic information network, and road sensor equipment. Capacity in the network is shared with other state and local government entities.

This project involves the deployment of multisector access points onto existing Delaware State Police towers. It includes a hybrid 11 GHz/fiber optic backbone interconnection network. CTC's responsibilities include propagation modeling, site selection, oversight of installation, and proof-of-performance testing evaluation.

Land Mobile Radio (LMR) System Design

Early in my career, as a group leader at the MITRE Corporation, I was the project leader for a wide range of land mobile initiatives for federal agencies. For the Federal Bureau of Investigation, I assisted in site selection and frequency channel planning for the Bureau's VHF land mobile radio system. For the Drug Enforcement Administration, I established design criteria for a new generation of VHF vehicle tracking equipment.

At Kelly Scientific I served as a project manager on projects for the Law Enforcement Assistance Administration (LEAA), the New York State Police, and the Georgia State Patrol. My tasks involved user requirements analysis, system design, and specification preparation for land-mobile radio, computer-assisted dispatching, and 911 emergency telephone systems. This work involved RF propagation coverage modeling, radio channel planning, and interference analysis in the VHF and UHF land mobile spectrum.

Broadband Planning Instruction-Expertise

Over the course of my career, I have prepared numerous digital network design training courses providing information on communications designs, applications, and operations. The courses have been presented at George Washington University (USA & Europe), ITS America for University of Maryland, COMNET, University of Alabama, and the National Security Agency (USA & UK).

Employment History

1990 – Present Vice President -Engineering Director, CTC Media Group, INC
 1983 – 2010 Founder and Principal Engineer, Columbia Telecommunications Corporation
 1981 – 1983 Vice President of Engineering, The Bertman Group, Vienna, VA

1971 – 1981 Group Leader, MITRE Corporation, McLean, VA and Frankfurt, Germany
1969 – 1971 Project Manager, Kelly Scientific Corporation, Washington, D.C.
1966 – 1969 Staff Engineer, Federal Communications Commission, Washington, D.C.

Licenses and Education

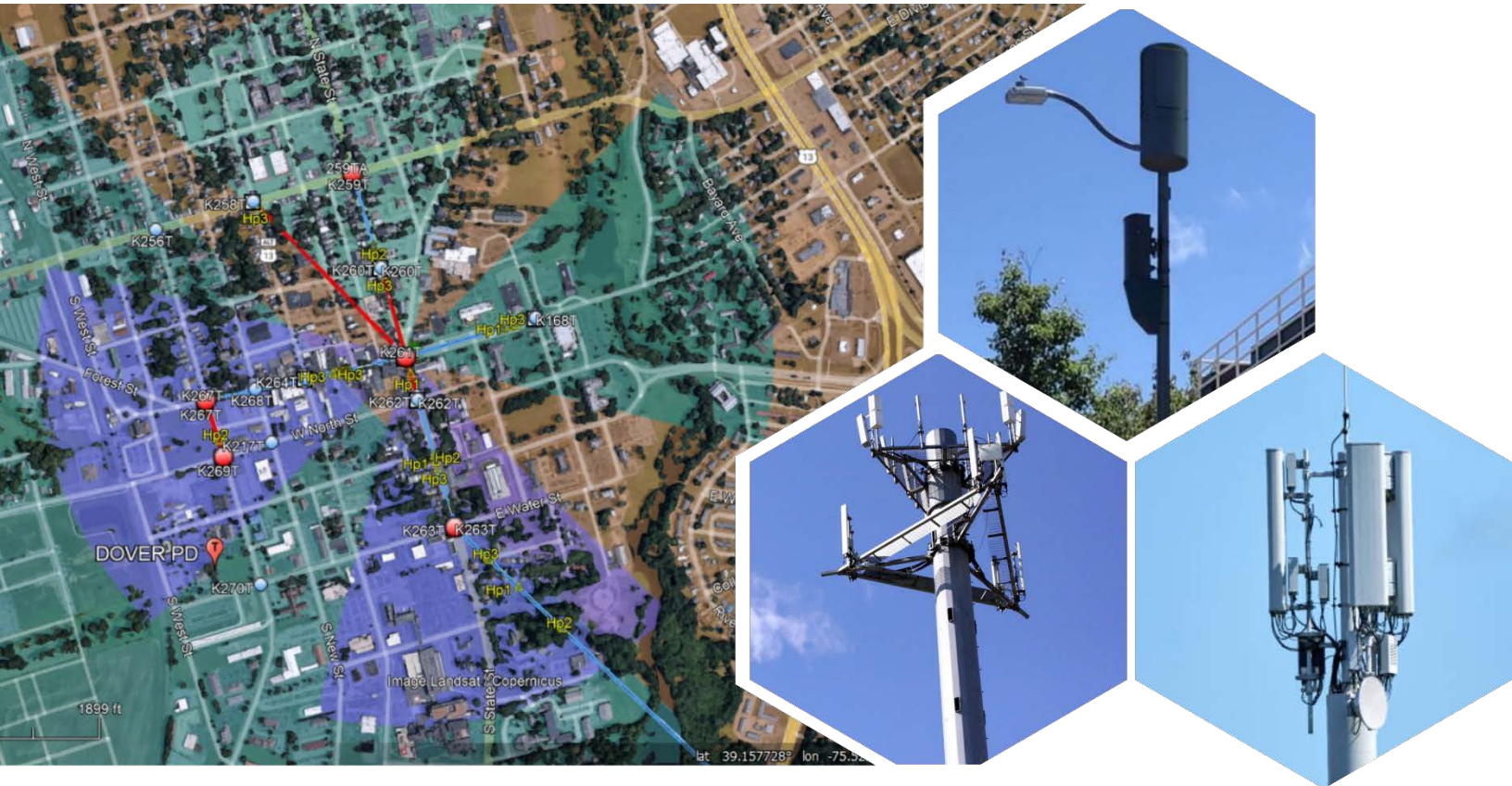
Professional Engineer, Delaware, District of Columbia, Maryland, North Carolina, and Washington

Professional Associations IEEE, SBE

Bachelor of Science, Electrical Engineering, Drexel University

Amateur Radio License – Extra Class License W3BRH

CTC Telecommunications Network Consulting



Response to PierCon Solutions – Radio Frequency Supplemental Report # 4

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

Response to PierCon Solutions – Radio Frequency Supplemental Report # 4

In support of the application for a new small wireless facility Verizon included a technical report prepared by the firm of PierCon Solutions. This report included analysis of existing coverage of all the nearby wireless sites to the proposed facility located at Carmelo Street in Carmel-by-the-Sea.

They also provided detailed mobile field measurements made within the City for both low-band (850 MHz) and mid-band frequencies (1900 and 2100 MHz). The purpose of providing the field measurement data was to verify signal power level and quality. Verizon then used that test data to demonstrate that there is a substantial gap in coverage area in the City for both Verizon's low-band and mid-band spectrum.

Independently, we used this same data in our model to verify that there is an existing gap in Verizon's wireless service. In our analysis we focused on measured signal amplitude and quality of the received signals in both low- and mid-band spectrum. Further, we used the signal quality measurements data evaluation criteria to conclude there is an existing gap. Figure 1 is a map provided by PierCon Solutions in their original technical report, dated October 10, 2025, which provides plots of the actual signal-to-noise measurements they recorded. The data was plotted over a 20-Decibel range, with 0 signifying no signal to a maximum of 20 dB signal-to-noise. The best performance is illustrated by the blue dots which represent 20 dB. The unacceptable or gap areas are denoted by either Gray or Black dots. Additionally, they provided a boundary of a dotted orange line describing their target area for upgraded wireless service with a "mid-band gap" which covers 0.39 square miles.

Figure 1 - Drive Test SINR (Signal to Interference/Noise Ratio) with Service Gap



Note on the map that many instances of the worst case (black dots) measurement from the data collected indicating “drop connections or no service” are located near 8th Avenue and Casanova Street. The areas surrounding the proposed site Verizon South Carmel 001 are either designated in gray (defined as “poor low throughput”) or yellow (defined as “Limited speeds, frequent retransmissions”)

Figure 2 is a map provided by PierCon in this latest report, dated February 23, 2026, RF Supplement #4. Note that they have redefined the boundary of the gap area (now shown as a red dotted line). The gap which used to include the area surrounding the Golden Blough Playhouse has been shifted without explanation such that it is no longer within the gap area. In fact, the new gap boundary has become Casanova Street, due west of the Playhouse. Yet the actual field measurements make it clear that one of the larger clusters of the worst-case coverage areas can be found around the intersections of Lincoln Street and Eighth Avenue.

Figure 2 - Re-Adjusted Boundaries of Verizon Mid Band Service Gap Area



On Long-Range Wireless Signal Projection Characteristics - Golden Bough Rooftop

At the start of our evaluation, we noted the relatively unobstructed water path which stretches from northwest across the bay from Verizon's Founders Building and Pebble Beach Tennis Club macro sites to the Carmel locations. Subsequently, we requested information from Verizon regarding specifics on the antennas employed at these sites as well as their beam tilt angle. It appears that Verizon does not use beam tilt to provide protection from an overly long signal path. Note in the letter below, Figure 3, that the beam tilt for Founders Building is one percent and for Pebble Beach is two percent. For all other sites inside the City of Carmel, the beam tilt is zero percent. It appears that Verizon finds that it is acceptable to employ a minimum beam tilt in its network design in the Carmel area, presumably because it provides greater coverage plus enhanced upload data flow from customers versus suppressing coverage to minimize interference.

In modeling the feasibility of the Golden Bough site, we will consider selecting antenna tilt angles that may create a reasonable area of overlap (interference on a ratio basis) that will not materially impact subscriber service performance consistent with the standards currently set for existing macro sites in Carmel.

Uplink Path Loss Considerations

We concur that 127 dB is a reasonable value to evaluate up link signal power. However, we have not had an opportunity to model this specific parameter on our computer model because all of the field measurement data provided by Verizon supporting the application until this most recent report dealt with download measurements only, which is the most common measurements used for network design. We can independently model the uplink performance using our computer model if we are provided with a printout from Verizon's model using a 5° download tilt.

Figure 3 – Antenna and Beam Tilt Information Provided by PierCon

PierCon Solutions LLC
Specialists in Wireless Systems

10 Park Place., Suite 402
Bldg 6C, Butler, NJ 07405
(973) 628-9330 phone
(973) 628-9321 fax

December 10, 2025

To: Jacob Olander
City of Carmel-by-the-Sea
COMMUNITY PLANNING AND BUILDING DEPARTMENT
POST OFFICE DRAWER CC
CARMEL-BY-THE-SEA, CA 93921

Subject: Completeness Review Letter – Second Notice of Incompleteness
Design Study Applications: DR 25313 & UP 25314 (Verizon/Sequoia Deployment) IFO Carmelo 4 SE of 10th

Mr. Olander:

The following information is being provided in response to the subject notification items 1 and 2, dated December 5th, 2025. In response to item #1, the following table is updated with the requested information including the antenna model, the antenna manufacturer, and the total beam tilt. The information below reflects the data received on February 14th 2025.

Site	Antenna (700MHz)	Antenna Manufacturer	Model #	Beam Tilt (°)
Downtown Carmel	SBNHH-1D6SA_00DT_700	Commscope	Gamma	0 deg
Founders Building	DBXNH-656SB-VTM_01DT_0750	Commscope	Beta	1 deg
Pebble Beach Tennis Club	NHHS4-65B-R3B_Port 1 +45_02DT_0710	Commscope	Beta	2 deg
SF South Carmel 003	CUUT070X06F0Y-0 750	Amphenol	Alpha	0 deg
SF South Carmel 003	CUUT070X06F0Y-0 750	Amphenol	Beta	0 deg

In response to item #2, the following Verizon site information was used to provide the coverage maps for SF South Carmel 002:

SITE	SF_SOUTH_CARMEL_002
Site Type	Outdoor Small Cell
Location (lat/long)	36.543588, -121.9297260
Antenna Centerline (ft)	49
Antenna Model	CX200MI236-1C1010_10DT
Antenna Manufacturer	JMA Wireless
Total Beam Tilt (deg)	10
Total ERP (W)	132.2

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

PLANNING COMMISSION RESOLUTION NO. 2026-002-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 10TH 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 DENIAL (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.

Municipal Code Findings – CMC Section 17.64.010 General Findings Required for All Use Permits	YES	NO
1. The proposed use will not conflict with the City's General Plan.		✓
General Plan conflict: When alternatives exist, the GP prioritizes community character over infrastructures.		
2. That the proposed use will comply with all zoning standards applicable to the use and zoning district.		✓
Zoning non-compliance: requires two special exceptions that cannot be granted.		
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.		✓
Set precedent: approving sites in the highly incompatible R-1 locations invites similar future applications.		
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.		✓
Injurious to safety: Fall zone concern – 50-foot structure only 25 feet from occupied residence, tree root disturbance.		
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.		✓
Incompatible land use: R-1 zone designated highly incompatible; directly fronts historic resource.		
7. That the proposed use will not generate adverse impacts affecting the health, safety, or welfare of neighboring properties or uses.		✓
Adverse neighboring impacts: structural proximity, trench encroachment on drip lines, visual intrusion.		
Municipal Code Findings – CMC Section 17.46.080.A Findings Required for Type 1 to IV Applications		
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 § 17.46.040 and the Administrative Detailed Wireless Facility Design Guidelines.		✓
Adverse visual impacts: non-compliant with development standards, special exceptions not justified.		
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.		✓
Special exceptions fail: Golden Bough Theater is viable less-intrusive alternative.		
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 § 17.64.010 .		✓
Use permit findings cannot be made (as indicated in the 17.64.010 failures noted in previous findings).		
8. All the findings for discretionary design review approval pursuant to CMC § 17.58.060		✓
• Conform to the applicable policies of the General Plan and the Local Coastal Program		✓
• Comply with all applicable provisions of this code		✓
• Are consistent with applicable adopted design review guidelines		✓
Design review fails: non-conformance with General Plan, LCP, and design guidelines.		
9. If applicable, all the findings required for a coastal development permit.		✓
• 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.		✓
• 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).	N/A	N/A
Coastal development permit fails: inconsistent with highly scenic area designation.		
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)		
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.		✓
No effective prohibition: the applicant failed to eliminate Golden Bough as least-intrusive alternative.		
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.		✓
Not narrowly tailored: two exceptions exceed what's necessary given viable alternative exists.		

Section 2: REASONS FOR DENIAL. THE PLANNING COMMISSION FOUND THAT:

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 failed to show that that the proposed site may be the least intrusive means because a less intrusive option may be technically feasible and potentially available. The Golden Bough Theater may address the coverage gap and may not require any Code exceptions.

The Applicant has failed under the materially inhibits standard because in considering the totality of the circumstances, including the Code’s sitting preferences and requirements, another location (such as the Golden Bough Theater) may be technologically, economically feasible, and potentially available. Therefore, the denial will not materially inhibit the carrier’s ability to provide personal wireless services.

Further, the Applicant has not shown that denial would violate state law because they have failed to show that the heightened review in the Carmel-by-the-Sea Municipal Code for facilities in the R-1 zone right-of-way violates the applicant’s statutory franchise in Public Utility Code 7901 to use of the right-of-way.

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: Allen, Ahlborn, Locke, Karapetkoba, LePage
- ABSENT:
- ABSTAIN:
- APPROVED:
- ATTEST:

_____	_____
Michael LePage Chair	Shelby Gorman Planning Commission Secretary

MACKENZIE & ALBRITTON LLP

155 SANSOME STREET, SUITE 620
SAN FRANCISCO, CALIFORNIA 94104

TELEPHONE 415 / 288-4000
FACSIMILE 415 / 288-4010

February 24, 2026

VIA EMAIL

Mayor Dale Byrne
Councilmembers Bob Delves, Jeff Baron,
Hans Buder, and Alissandra Dramov
City Council
City of Carmel-by-the-Sea
Monte Verde Street
Carmel-by-the-Sea, California 93921

Re: Verizon Wireless Appeal, Applications DR 25313, UP 25314
Small Wireless Facility, Carmelo Street, City of Carmel-by-the-Sea
City Council Agenda, March 2, 2026

Dear Mayor Byrne and Councilmembers:

Verizon Wireless requests that the City Council grant its appeal of the Planning Commission's denial of a small cell wireless facility on a replacement utility pole in the Carmelo Street public right-of-way (the "Proposed Small Cell"). Denial would violate both federal and state law. First, a denial would prohibit Verizon Wireless's ability to provide service, violating the Federal Telecommunications Act. 47 U.S.C. § 332(c)(7)(B)(i)(II). As demonstrated by voluminous evidence in the administrative record, including reports from qualified experts in their fields, the Proposed Small Cell is the least intrusive means to fill a significant gap in service, and denial would materially inhibit Verizon Wireless's intended service improvements in Carmel-by-the-Sea (the "City"). Denial would also violate state law, which grants telephone corporations a statewide right to place their equipment along any public right-of-way. Cal. Pub. Util. Code §7901.

Verizon Wireless has worked tirelessly to ensure that the Proposed Small Cell complies with all standards and findings of the Carmel-by-the-Sea Municipal Code (the "Code") and *Administrative Detailed Wireless Facility Design Guidelines* (the "Design Guidelines"), except for two location standards requiring approval of special exceptions. Verizon Wireless has justified those exceptions in accordance with Code requirements, as confirmed by the City's consultants. Consequently, a denial would also give rise to a federal action that the denial is not supported by substantial evidence. 47 U.S.C. § 332(c)(7)(B)(iii). The Code and Design Guidelines would also be vulnerable to a challenge as applied to Verizon Wireless's application.

The City has denied six small cell wireless applications over the last seven years under both an old code and a new one. Indeed, we are not aware of a single small cell wireless facility in the public right-of-way that the City has approved for any carrier ever. If the City denies the application for the Proposed Small Cell, it will have violated the Federal Communications Commission’s (“FCC’s”) moratorium order. *De facto* moratoria are “state or local actions that are not express moratoria, but that effectively halt or suspend . . . approval of applications or permits for telecommunications services or facilities in a manner akin to an express moratorium.” *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Inv.*, 33 FCC Rcd. 7705 (August 3, 2018) at 7780, ¶ 149. *De facto* moratoria include “refusals to issue permits for a category of structures.” *Id.* Here, in addition to the lack of a single small cell in the City, the denial explicitly finds that approval of the Proposed Small Cell would “[s]et precedent” and that “approving sites in the highly incompatible R-1 locations invites similar future applications.” Denial Resolution, General Finding No. 3. The City plainly has a *de facto* moratorium on small cells in the public right-of-way.

The Proposed Small Cell will provide much-needed service in the City. The Proposed Small Cell will improve existing service and provide new 5G service. It includes a single small cylindrical antenna on top of an existing utility pole and network equipment concealed in a narrow shroud on the side of the pole. Because the existing wood pole is more than 70 years old, PG&E will replace it. Like most residential streets in the City, Carmelo Street is already lined with utility poles supporting transformers, utility lines, and other utility components of varying heights and bulk. Verizon Wireless’s discrete and minimal design fits in with the character of the neighborhood.

The Proposed Small Cell will provide reliable network service for residents, visitors, and emergency personnel. We urge the City Council to reverse the Planning Commission’s denial and approve the Proposed Small Cell.

I. Procedural History

Verizon Wireless applied for the Proposed Small Cell on October 15, 2025, after years of studying the City’s new Code and Design Guidelines. Planning Division staff originally recommended approval of the Proposed Small Cell in its staff report for the January 21, 2026, hearing (“January 21 Staff Report”), which the Planning Commission continued after hearing testimony from opponents of wireless facilities. The staff report for the February 10, 2026, hearing (“February 10 Staff Report”) continued to confirm compliance with all City standards, except for one special exception finding regarding alternative locations. The Planning Commission’s resolution included only thin findings of denial, unsupported by substantial evidence in violation of the federal Telecommunications Act.

II. The Proposed Small Cell

The Proposed Small Cell will be located on Carmelo Street between 10th and 11th Avenues. PG&E will replace an existing 38-foot 11-inch utility pole with a new, taller

pole because the existing pole is more than 70 years old. *See* Plans, attached as Exhibit A, at Sheets A-3, A-4; Verizon Wireless Responses to Comments, Vol. 1, January 30, 2026 (“Verizon Responses Vol. 1”), attached as Exhibit B, at pp. 3-4. Verizon Wireless will install a 2.5-foot-tall cylindrical pole-top antenna, making the new pole height 49 feet 10 inches. *Id.* Associated network equipment will be placed on the side of the pole between 7 and 17 feet, including radios and power supply units concealed within a narrow shroud as well as a PG&E electric meter/disconnect switch. *Id.* A nearby tree in the right-of-way will help screen the network equipment from view. *See* Photosimulations, attached as Exhibit C.

In addition to complying with the City’s Code and Design Guidelines, the Proposed Small Cell is subject to rules and regulations enacted by PG&E and the California Public Utilities Commission (“CPUC”). The Proposed Small Cell complies with these additional requirements, as demonstrated by PG&E’s approval of the project design. Verizon Wireless February 10, 2026, Presentation to Planning Commission, attached as Exhibit D, at p. 11.

III. The Proposed Small Cell Complies with All City Standards and Findings for Approval.

The Proposed Small Cell satisfies the Code and Design Guidelines standards and findings, including the findings required for two special exceptions to location standards. The antenna volume (2.89 cubic feet) falls below the 3-cubic foot limit. *See* Exh. A – Plans, Sheet D-2; Design Guidelines § II(B)(3). The network equipment will be concealed within a narrow vertical shroud mounted to the side of the pole along with a PG&E electric meter/disconnect switch. The total associated equipment volume will be 16.48 feet in volume, less than the 17 cubic feet allowed. *See* Exh. A – Plans, Sheet D-2; Design Guidelines § II(C)(2).

The Proposed Small Cell complies with the height limit in the right-of-way, where a facility on a replacement pole may rise 10 feet above the height of the replaced pole, or the additional height is necessary to comply with CPUC standards. Code § 17.46.040(F)(1)(b); Design Guidelines § II(A)(1); Exh. B – Verizon Responses Vol. 1, at pp. 3-4. The Proposed Small Cell will be 10 feet 8 inches taller than the existing utility pole. The additional 8 inches is required so the antenna and its mounting hardware is at least 6 feet above primary power lines, as required by CPUC General Order 95, Rule 94.4(C). Verizon Wireless may be able to reduce the height by six inches while complying with General Order 95.

As to equipment placement preferences, the pole-mounted network equipment is allowed because the preferred options of an underground vault or pole-mounted shroud less than six cubic feet are infeasible. Design Guidelines § II(C)(1). Verizon Wireless provided a vaulting analysis confirming that an underground vault is infeasible due to the large excavation area and loss of parking, as well as existing tree roots and underground utilities near the pole. Exh. B – Verizon Responses Vol. 1, at p. 3; Verizon Wireless Application Letter, October 14, 2025, attached as Exhibit E, at pp. 6-7. Additionally, it is

technically infeasible for a shroud less than six cubic feet to contain the network equipment required: two radios, a fiber box, two power supply units, and a cable diplexer, plus space for air circulation and worker access. Accordingly, the Code and Design Guidelines permit Verizon Wireless to install equipment concealed in a 15-cubic foot equipment shroud. Design Guidelines § II(C)(2). The January 21 Staff Report confirmed that the Proposed Small Cell complies with the volume, height, and equipment placement requirements, among other criteria.

The Code and Design Guidelines highly discourage wireless facilities in residential zone rights-of-way, despite the fact that the majority of the City is residential in nature. Code § 17.46.040(E)(1)(a). Small cell facilities are intended to fill in gaps where larger macro facilities do not reach, so the Proposed Small Cell needs to be near the area it serves. PierCon Report, October 14, 2025, attached as Exhibit F, at p. 7. The Proposed Small Cell requires only two special exceptions to Code standards, based on its location within the right-of-way in single-family residential zone and in front of an area five feet in either direction from the centerline of residential door or window. Code §§ 17.46.040(E)(1)), 17.46.040(E)(2)(a). Verizon Wireless submitted a letter describing how its proposal meets the exception findings of Code Section 17.46.080(C) (Exhibit E), along with supporting evidence: the justification report by independent engineering firm PierCon Solutions (Exhibit F) and an Alternatives Analysis, attached as Exhibit G. Staff originally recommended approval of the exceptions. January 21 Staff Report, p. 17.

The Proposed Small Cell also satisfies the findings for approval of a use permit, coastal development permit, and design review. Code §§ 17.64.010, 17.58.060. For example, the Proposed Small Cell will not generate adverse impacts affecting the health, safety or welfare of neighboring properties because of its small size and placement on one of the many utility poles already lining Carmelo Street. The Dtech report confirms compliance with FCC radio frequency exposure limits (Exhibit H), and the Hammett & Edison report confirms compliance with City noise standards (Exhibit I). The Proposed Small Cell satisfies all City requirements for approval.

IV. The Planning Commission’s Denial Lacked Substantial Evidence.

The Planning Commission’s denial was not supported by substantial evidence of non-compliance with the Code and Design Guidelines. Additionally, several of the denial findings are preempted by federal or state telecommunications law.

Under the federal Telecommunications Act, a local government’s denial of a wireless facility application must be based on “substantial evidence.” See 47 U.S.C. § 332(c)(7)(B)(iii). This means that denial must be based on requirements set forth in local regulations and supported by evidence in the record. See *Metro PCS, Inc. v. City and County of San Francisco*, 400 F.3d 715, 725 (9th Cir. 2005).

The FCC requires that a city’s aesthetic criteria for small cell facilities must be “reasonable,” that is, technically feasible and meant to avoid “out-of-character” deployments and “published in advance.” See *Accelerating Wireless Broadband*

Deployment by Removing Barriers to Infrastructure Investment, Declaratory Ruling and Third Report and Order, 33 FCC Rcd. 9088, 9132, ¶¶ 86-88 (FCC 2018) (the “*Infrastructure Order*”). The FCC also found that local regulations that “materially inhibit” service improvements constitute a prohibition of service that violates the federal Telecommunications Act. *Id.* at 9104, ¶ 37; *see also* 47 U.S.C. §§ 253(a), 332(c)(7)(B)(i)(II).

Finally, California Public Utilities Code Section 7901 grants telephone corporations a statewide right to place their equipment along any public right-of-way. The California Supreme Court has upheld this right, affirming that permits for right-of-way facilities may be conditioned on aesthetics. *See T-Mobile West LLC v. City and County of San Francisco* (2019) 6 Cal.5th 1107, 1122. However, as noted, the FCC ruled that such aesthetic requirements must be “reasonable.”

Guided by this legal framework, Verizon Wireless responds to the Commission’s grounds for denial as follows.

A. The Golden Bough Theatre Is Not a Technically Feasible Alternative.

To avoid federal preemption under the prohibition of service standard, the City must raise another alternative that is available, technologically feasible, and less intrusive than the proposed facility, then allow Verizon Wireless to review that alternative. *See T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987, 998-999 (9th Cir. 2009). The Planning Commission claimed that the Golden Bough Playhouse - Founders Theatre and Circle Theatre (“Golden Bough”) is a viable, less intrusive alternative to the Proposed Small Cell. However, the Commission did not demonstrate that a facility at the theater could serve Verizon Wireless’s gap in service in western Carmel. Furthermore, the Golden Bough is likely unavailable and plainly more intrusive than the Proposed Small Cell. Finally, the City’s preference for private property over the public right-of-way is preempted by federal and state law.

1. A Rooftop Wireless Facility on the Golden Bough Is Technically Infeasible and Cannot Serve the Gap.

Verizon Wireless found that a facility at the Golden Bough could not serve the significant gap due to distance from the gap. Additionally, the Code’s 34-foot height limit would require the antenna at this location to be 15 feet lower than the Proposed Small Cell. *See Alternatives Analysis*, p. 10 (Exhibit G); *see also* Code §§ 17.10.030(B), 17.18.100, 17.46.040(F)(1)(b); Design Guidelines § I(B)(2).

PierCon Solutions also confirmed that a wireless facility on the Golden Bough roof, no matter the types of antennas used or design, could not serve the gap area. PierCon Solutions initially modeled a wireless facility at the Golden Bough as a small cell. *See* Exh. F – PierCon October 14, 2025, pp. 18-19. PierCon Solutions confirmed that the theater location could address only 25% of the coverage gap, concluding that “[t]he alternative Golden Bough Playhouse will not effectively address the coverage gap,

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limit the ability to improve and enhance existing service, and limit the ability to introduce new services.” *Id.* at p. 18. The City’s consultant, CTC Telecommunications, agreed, writing “[b]ased on our review of the more detailed and updated data and analysis provided by PierCon in its reports, the Golden Bough Playhouse would not effectively address the coverage gap and other service deficiencies.” *See* CTC Telecommunications *Review of the Application of Verizon Wireless to Install a New Small Wireless Facility*, January 2026, p. 20.

To address questions from the Planning Commission at its January 21, 2026, hearing, PierCon Solutions prepared additional reports. PierCon Solutions modeled various configurations and found that “[t]he only configuration that produced marginally acceptable modeled results” required a score of conditions simultaneously. PierCon Solutions *Radio Frequency Supplemental Report #2*, January 30, 2026, attached as Exhibit J, at pp. 6-7. These conditions include requiring a six-foot tall antenna (the “Macro Design”) and narrow horizontal beamwidth antennas. *Id.* Even then, PierCon Solutions found:

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.

Id. at p. 7. PierCon then evaluated the signal blockage by nearby trees, determining that “[f]ield verification demonstrates that rooftop siting conditions materially constrain the ability to achieve reliable, localized small cell coverage within the defined service area.” *See* PierCon Solutions *Radio Frequency Supplemental Report #3*, February 9, 2026, attached as Exhibit K, at p. 5. Additionally, Verizon Wireless further explained that 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. Verizon Wireless Responses to Comments, Vol. 2, February 6, 2026 (“Verizon Responses Vol. 2”), attached as Exhibit L, at pp. 2-3, 5. The drone photo, which shows the vantage point from the Golden Bough roof facing the coverage objective, demonstrates that there is substantial tree cover between the Golden Bough and the targeted area. These trees would obstruct the signal from the antenna, irrespective of the antenna type, preventing it from serving the coverage area. *Id.*

There is no substantial evidence in the record to support a conclusion that the Golden Bough is a technically feasible alternative that will meet Verizon Wireless’s network needs and fill the gap. Substantial evidence means “such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.” *MetroPCS v. City & County of San Francisco*, 400 F.3d 715, 723, 725 (9th Cir. 2005), abrogated on other grounds, *T Mobile South, LLC v. City of Roswell*, 574 U.S. 293 (2015). To meet the substantial evidence test, a denial must be “supported by a reasonable amount of evidence (i.e., more than a ‘scintilla’ but not necessarily a preponderance).” *Id.* at 725.

Here, the opponents offered only lay opinion that Verizon Wireless's expert is wrong, and that they believe that the Golden Bough location would work, without any evidentiary support. The Planning Commission pulls one sentence from a PierCon Report out of context as evidence that the Golden Bough is a viable alternative. However, they omit PierCon's final paragraph, which states that "the modeled performance at this location does not reliably translate to real-world conditions" so the Golden Bough "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" even using the Macro Design. Exh. J, p. 7.

Therefore, neither the opponents nor the Planning Commission provided substantial evidence to contradict PierCon's conclusions, which were upheld by the City's consultant, CTC Telecommunications. See CTC Telecommunications *Review of the Application of Verizon Wireless to Install a New Small Wireless Facility*, January 2026, p. 20.

PierCon Solutions then prepared an additional report, performing additional technical evaluations, including maximum allowable path loss, comparative AWS path loss modeling, evaluation of antenna constraints, line-of-sight profile and free-space propagation analysis, and assessment of downtilt tradeoffs. PierCon Solutions Radio Frequency Supplemental Report #4, February 9, 2026, at p. 4, attached as Exhibit O. The report yet again confirmed that the Golden Bough "does not represent a technically feasible alternative for achieving the documented service objectives under consistent engineering criteria." *Id.* PierCon Solutions included the parameters of their analysis so that it can be duplicated and analyzed by the City's expert consultant, CTC Telecommunications. *Id.* at p. 25.

2. The Golden Bough Is Likely Not Available.

Even if the Golden Bough were a technically feasible alternative, which it is not, it is not clear that it is available. Verizon Wireless has had several conversations, in good faith, with the director of the theater and visited the site to determine whether it is constructable. Exh. L – Verizon Responses Vol. 2 at p. 2. While there may be room on the roof for a wireless facility, there are numerous constraints limiting the locations on the roof where a wireless facility could be placed. Verizon Wireless Responses to Comments, Vol. 3, February 24, 2026 ("Verizon Responses Vol. 3"), attached as Exhibit M, at pp. 1-3. These limitations include existing solar panels on the roof, which the Golden Bough intends to expand. Solar panels cause interference with wireless signals (passive intermodulation), causing network disruption. The wireless facility must also be placed in a location that does not interfere with theater activity. *Id.* The director requested that any wireless facility be located on the north edge of the building, which would require that the wireless facility be 18 feet above the roof to obtain the same antenna elevation as the highest point on the west of the roof. *Id.*

Further, it not clear that the theater would even approve a lease with Verizon Wireless. The theater representative has already expressed concerns regarding

interference from the wireless facility on theater equipment and operations. Exh. M – Verizon Responses Vol. 3 at p. 3. Additionally, one of the Pacific Repertory Theatre¹ Board of Directors officers, Karyl Hall,² opposed the Proposed Small Cell before the Planning Commission. See January 21 Staff Report, Attachment 11, *Resident Correspondence*, p. 16.

3. The Golden Bough Is More Intrusive than the Proposed Small Cell.

The Golden Bough is not a superior alternative to the Proposed Small Cell, as it would require a height exception and result in potential impacts to historic resources, with potentially more aesthetic impacts due to required tree trimming.

First, Verizon Wireless would need an exception to allow for a height increase above the 34 feet allowed by the Code, described above. In addition, the Golden Bough is listed on the *Carmel Inventory of Historic Resources* as a Criteria 1 facility, the highest historic designation. Exh. M – Verizon Responses Vol. 3 at pp. 3-4. Any alterations would be subject to historic impact review not required for the Proposed Small Cell. Placing a wireless facility on the Golden Bough would require review under the City’s Historic Preservation code, as well as review and consultation with the California State Historic Preservation Officer. *Id.* The Proposed Small Cell is adjacent to a home listed as Criteria 3 on the City’s historic inventory, a much lower designation. *Id.* Additionally, neither the proposed pole nor the right-of-way is historic. *Id.* Consequently, the Golden Bough is much more intrusive than the Proposed Small Cell with respect to potential impacts to historic resources.

Furthermore, as demonstrated by the drone picture, the volume of tree trimming, if even possible, would surpass that of the Proposed Small Cell. Exh. L – Verizon Responses Vol. 2 at p. 5. Consequently, even if it were technically feasible and available, it is more intrusive than the Proposed Small Cell.

4. The City’s Preference for Private Property is Preempted by Both Federal and State Law.

Forcing a telephone corporation to relocate a proposed small cell to private property would require a lease, ongoing rental payments, and restrictive terms not required for the right-of-way. That would increase the costs of deployment, inappropriately involve private landowners in the site selection process and operation of a facility, and delay installation. Construction costs for a wireless facility on the Golden Bough would be at least three to four times those of the Proposed Small Cell. Exh. M – Verizon Responses Vol. 3 at p. 3. Rent would be orders of magnitude higher and maintenance costs would also be higher. *Id.* The additional expense, burdens, and delay of forcing a telecommunication company to lease private property would “materially inhibit” service improvements in violation of the Telecommunications Act. See also *T-*

¹ The Pacific Repertory Theatre operates the Golden Bough.

² Board of Directors information available at: <https://www.pacrep.org/board-of-directors>

Mobile v. Anacortes, supra, 572 F.3d 987, 998 (finding that “the environmental impact and additional costs” associated with the city’s proposed two-site alternative did not defeat T-Mobile’s showing that its site was the least intrusive means”). In contrast, Verizon Wireless can attach its equipment to utility poles in the right-of-way as a member of the Northern California Joint Pole Association, with low deployment costs and an established, expedited approval process.

Federal law also bars the City from redirecting the Proposed Small Cell to a building on private property where a different wireless technology may be required, a macro facility instead of a small cell. PierCon determined that a different antenna configuration would be required at the Golden Bough, with two narrow beamwidth antennas at two azimuths, but that factors including low height and nearby tree attenuation still render it to be an infeasible alternative. Exh. J – January 30 PierCon Report at pp. 6-7.

Even if a macro facility were viable, the FCC has exclusive jurisdiction over the technical and operational aspects of wireless networks, so the City cannot directly or effectively dictate the technology that wireless carriers use to provide service. *See New York SMSA Ltd. Partnership v. Town of Clarkstown*, 612 F.3d 97, 105-106 (2nd Cir. 2010). Accordingly, the City is preempted from requiring certain technologies at the Golden Bough or any wireless facility, such as the high-gain directional antennas suggested by opponents’ counsel Andrew Campanelli, who is not an engineer.

Further, denial due to a preference for private property would directly violate state law by depriving Verizon Wireless of its right to place equipment along any public right-of-way. Pub. Util. Code § 7901.

Because the Golden Bough is an infeasible alternative, and because the preference for private property is preempted by both federal and state law, this ground for denial must be rejected.

B. The Proposed Small Cell Is Consistent with the General Plan.

The Commission vaguely claimed that the General Plan prioritizes community character over infrastructure when alternatives exist, without citing any General Plan goal, objective, or policy. That baseless claim cannot serve as substantial evidence for denial, and it assumes that community character and infrastructure are in conflict. However, the two are compatible, as confirmed by the City Council’s adoption of a new wireless code in 2023, which it found would “[c]omply with all applicable goals, objectives and policies of the General Plan.” *See Ordinance 2023-006; Code § 17.46.010(B)(4)(a).*

The General Plan is silent on the topic of wireless facilities but notes the community benefit of “improved communications infrastructure.” General Plan Land Use & Community Character Element, p. 1-25. The only General Plan provision specifically requiring comparison of alternatives is Policy P1-104, which prohibits

changes to historic resources inconsistent with the Secretary of the Interior's Standards unless there are no feasible alternatives that are consistent. *Id.* at p. 1-48. That provision is irrelevant because the Proposed Small Cell is not on a historic resource, as discussed below. Lacking any evidence of non-compliance with the General Plan, this ground for denial must be dismissed.

C. The Special Exceptions Are Justified.

The Commission confirmed that only two special exceptions are required but provided no explanation for denying them other than "zoning non-compliance" and "Golden Bough Theater is viable less-intrusive alternative." As described above, Verizon Wireless provided an exception request letter and supporting evidence. Exhs. E, F, and G. Independent expert PierCon confirmed that the Golden Bough is in fact infeasible, and the City has not provided substantial evidence to contest that conclusion. Accordingly, Verizon Wireless has justified the two special exceptions. This ground for denial must be rejected.

D. Speculation About Future Applications Is Beyond the Scope of this Small Cell Application, Which Must Be Evaluated on Its Own Merits.

Citing one of the general use permit findings, the Commission worried that approval of the Proposed Small Cell "invites similar future applications" so would set a precedent. Speculative concern over future circumstances is not substantial evidence that warrants denial of the present application. Even if there were a future application, it would be subject to the City's exhaustive review process and additional standards such as the required 500-foot separation of wireless facilities in the right-of-way. Code § 17.46.040(E)(2)(b). To the extent the Commission was concerned about additional wireless equipment on the proposed pole, the Code considers eligible facilities requests as Type V sites. Code § 17.46.020(A)(28). 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 for wireless facilities on this pole. It is also unlikely that another carrier would propose equipment for this pole because PG&E and the CPUC both have strict regulations governing wireless facilities on this pole.

Denial of any wireless facility in the R-1 zone based on this ground would constitute an effective prohibition of service, given that the R-1 zone comprises much of the City. It would also violate Section 7901 by excluding wireless facilities from residential rights-of-way. Due to the lack of evidence and the prohibitive effect, this ground for denial must be dismissed.

E. The Proposed Small Cell Will Comply with Applicable Safety Rules and Regulations.

The Commission alleged non-compliance with the use permit finding regarding health, safety, and welfare due to a “fall zone concern” of a 50-foot structure located 25 feet from a residence. Again, though, the Commission provided no evidence that the Proposed Small Cell or the replacement utility pole would fall. This concern is unwarranted, given that there is presently a 38-foot, 11-inch, 70-plus year-old wooden pole at the location. The structural integrity of the project was confirmed by a registered professional engineer at Allstates Engineering & Surveying, which concluded: “The antenna mounting equipment is adequate for the proposed scope of work and complies with GO95 and ANSI 05. The pole capacity will meet the original pole class requirements after proposed attachment.” See Allstates Engineering & Surveying *Structural Analysis Report*, p. 1.

PG&E will inspect the utility pole and Proposed Small Cell during and after the installation process. The City will confirm structural adequacy of the pole and equipment through the pending building permit application and subsequent inspections. Lacking substantial evidence, this ground for denial must be rejected.

F. The Proposed Small Cell Will Not Impact the Nearby Tree.

With respect to the nearby tree, the Commission raised concern over root disturbance and encroachment on drip lines. At a February 4, 2026, meeting with City staff, a PG&E arborist confirmed that replacement of the utility pole would not adversely affect the root structure of the tree because the replacement pole will be placed in the same hole as the existing pole. Exh. M – Verizon Responses Vol. 3 at p. 1. The Code’s discouragement of wireless facilities within tree drip lines applies to new poles, not replacement poles. Code § 17.46.040(F)(1)(f). The Commission did not provide evidence that the replacement pole would cause adverse impact to the tree, so this ground for denial must be dismissed.

G. The Proposed Small Cell Will Not Impact Any Historic Resource.

The Proposed Small Cell will be located on a utility pole, which is not a historic resource. The Commission alleged incompatibility with surrounding land uses because the utility pole is near the frontage of a home listed on the *Carmel Inventory of Historic Resources*. However, that inventory designates the APN of the adjacent private property as the historic resource, whereas the Proposed Small Cell is in the right-of-way, not on private property. Accordingly, the Code does not require review of the Proposed Small Cell by the Historic Resources Board, and in fact, the utility pole is not a “historic resource” as defined. Code §§ 17.46.020(A)(11), 17.46.050(B)(4)(b).

The Commission provided no explanation or evidence as to how placing small equipment components on a utility pole would affect a building 25 feet away. In fact, the Commission conceded that there is no effect. One of the highly incompatible locations in

the right-of-way designated by the Code is any location that would trigger review of consistency with the Secretary of the Interior's standards. Code § 17.46.040(E)(1)(b). However, the staff reports and the Planning Commission resolution confirmed that only two special exceptions to Code standards are required, and that Code standard is not one of them.

The Secretary of the Interior's Standards address preservation, rehabilitation, restoration, or reconstruction of a historic property. 36 C.F.R. Part 68. Verizon Wireless is doing none of those. This ground for denial raises an irrelevant subject and must be rejected.

H. The Proposed Small Cell Will Pose Minimal Visual Impact.

The Commission's denial alleged "visual intrusion," "adverse visual impacts," and, with respect to coastal development standards, "inconsistent with highly scenic area designation." The Commission provided no elaboration or evidence to support those claims. Generalized aesthetic objections do not amount to substantial evidence upon which a local government could deny a wireless facility permit. *See City of Rancho Palos Verdes v. Abrams*, 101 Cal. App. 4th 367, 381 (2002).

Those vague visual impact claims are unreasonable and prohibitive according to the FCC's *Infrastructure Order*, because the Proposed Small Cell is not "out-of-character" compared to the existing utility infrastructure lining Carmelo Street and most other Carmel residential streets.

According to the General Plan, the referenced "highly scenic area" is "the incorporated limits of the City of Carmel-by-the-Sea." General Plan Land Use & Community Character Element, p. 1-1. By the Commission's rationale, no new wireless facility could be granted a coastal development permit because the entire City is a "highly scenic area." This further illustrates the prohibitive effect of the Commission's vague visual impact claims.

The photosimulations demonstrate the minimal visual impact of the Proposed Small Cell. Exh. C – Photosimulations. The pole-top antenna will not block coastal views of the ocean or the local landscape. *Id.* Instead, the antenna will be viewed against the sky, like equipment at the top of other utility poles along Carmelo Street, such as the transformer and two crossbars on the pole due north. Verizon Wireless's equipment shroud will be placed low on the pole, screened by the existing tree, whereas there is an even wider cabinet mounted low on the pole due south with no screening. *See* photographs of adjacent utility poles, attached as Exhibit N. In responding to opponent claims and photographs purporting to show view impacts, staff noted:

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.

February 10 Staff Report at p. 10.

Given the existing utility poles and utility lines along Carmelo Street and other local streets, the Proposed Small Cell will not degrade the local streetscape or block significant views, so it will cause no adverse visual impact. Indeed, in the context of the California Environmental Quality Act (Pub. Res. Code §§ 21000 *et seq.*) (“CEQA”) and CEQA Guidelines (14 Cal. Code of Regs. §§ 15000–15387), courts have routinely determined that wireless facilities in the public right-of-way generally do not result in significant aesthetic impacts. *See, e.g., 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).

Verizon Wireless provided evidence confirming that the Proposed Small Cell complies with the specific equipment volume, placement, and height criteria of the Design Standards, which were developed specifically for wireless facilities. Because the Commission provided no substantial evidence of adverse visual impact, this ground for denial must be dismissed.

In sum, the Planning Commission provided no evidence—let alone the substantial evidence required by federal law—to warrant denial of the Proposed Small Cell. In contrast, Verizon Wireless has provided ample evidence supporting approval.

V. Denial Would Constitute an Unlawful Prohibition of Service.

The Telecommunication Act provides that local government regulation of wireless facilities “shall not prohibit or have the effect of prohibiting” the provision of personal wireless service. 47 U.S.C. § 332(c)(7)(B)(i)(II). Under long-established Ninth Circuit case law, a local government’s denial of a wireless facility permit violates the “effective prohibition” clause of the act if a wireless provider can show (1) that it has a “significant gap” in service, and (2) that a facility is the “least intrusive means,” in relation to the land use values embodied in local regulations, to address the gap. *See T-Mobile v. Anacortes, supra*, 572 F.3d at 987.

If a provider proves both elements, the local government *must* approve the facility, even if there is substantial evidence to deny the permit under local regulations (which is not the case here). This is because federal law preempts local regulations when denial of the permit would effectively prohibit the provision of personal wireless services. *Id.*, 572 F.3d at 999. To avoid such preemption, the local government must show that another alternative is available, technologically feasible, and less intrusive than the proposed facility. *Id.*, 572 F.3d at 998-999. For wireless carriers to establish a

prohibition case, federal law does not require that a proposed facility be the “only” alternative, but rather that no feasible alternative is less intrusive based on local regulations. *See Metro PCS, Inc. v. San Francisco*, 400 F.3d at 734-735.

The FCC determined that this two-part test is too narrow and confirmed that a wireless carrier need not show an insurmountable barrier, or even a significant gap, to prove a prohibition of service. *Infrastructure Order*, 33 FCC Rcd. at 9102-9106, ¶¶ 35, 38. Instead, “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.’” *Id.*, ¶ 35. Thus, state or local regulations are preempted if they materially inhibit “densifying a wireless network, introducing new services, or otherwise improving service capabilities.” *Id.* at 9104, ¶ 37.

In this case, denial would not survive judicial review under either standard. First, denial would violate the two-part test for a prohibition of service claim. The PierCon Solutions reports provide evidence of a significant gap in Verizon Wireless service in western Carmel. The Alternatives Analysis evaluated other zones preferred by the Code as well as 28 utility poles, and it confirms that the Proposed Small Cell is the least intrusive feasible option in the right-of-way to serve the significant gap. Detailed analysis and evidence presented by Verizon Wireless and PierCon Solutions confirm that the Golden Bough is not a feasible, less intrusive alternative. Therefore, denial would constitute a prohibition of service according to the two-part test.

Second, the evidence demonstrates that the Proposed Small Cell will improve Verizon Wireless service in the area, densify the network with another facility, and provide new 5G service. A denial redirecting Verizon Wireless to a location such as the Golden Bough would materially inhibit Verizon Wireless’s ability to provide service due to unreasonable costs, delay, and an inefficient network design that would likely require another small cell to provide sufficient service.

In sum, denial of the application would prevent Verizon Wireless from improving its service, and therefore materially limit or inhibit its ability to compete in a fair and balanced legal and regulatory environment. In other words, denial would constitute an effective prohibition of service in violation of the Telecommunications Act. *See* 47 U.S.C. §§ 253(a), 332(c)(7)(B)(i)(II); *Infrastructure Order*, 33 FCC Rcd. at 9102-9105, ¶¶ 35, 37.

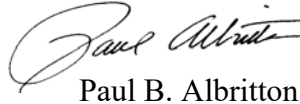
VI. Conclusion

Verizon Wireless has worked diligently for six years to obtain a permit for a new small cell to provide reliable wireless service in western Carmel. The Proposed Small Cell complies with all City standards, including the findings for approval of two special exceptions. The Planning Commission provided no substantial evidence to support its denial and raised numerous topics that are irrelevant or preempted by federal or state law.

Carmel-by-the-Sea City Council
 February 24, 2026
 Page 15 of 15

We urge the Council to overturn the Commission's denial and approve the Proposed Small Cell.

Very truly yours,



Paul B. Albritton

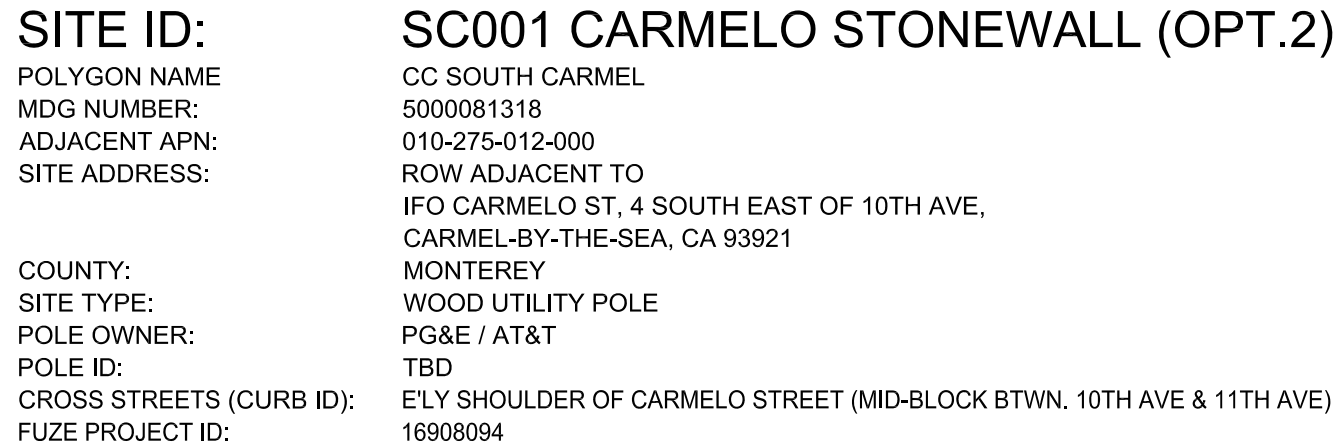
cc: Brian Pierik, Esq.
 Gail Karish, Esq.
 Jacob Olander

Schedule of Exhibits

- Exhibit A:** Plans
- Exhibit B:** Verizon Wireless Responses to Comments, Vol. 1, January 30, 2026
- Exhibit C:** Photosimulations
- Exhibit D:** Verizon Wireless February 10, 2026, Presentation to Planning Commission
- Exhibit E:** Verizon Wireless Application Letter, October 14, 2025
- Exhibit F:** PierCon Solutions Radio Frequency Report, October 14, 2025, and Supplemental Report #1, November 19, 2025
- Exhibit G:** Alternatives Analysis
- Exhibit H:** Dtech Communications Radio Frequency Compliance Report
- Exhibit I:** Hammett & Edison Noise Compliance Report
- Exhibit J:** PierCon Solutions Radio Frequency Supplemental Report #2, January 30, 2026
- Exhibit K:** PierCon Solutions Radio Frequency Supplemental Report #3, February 9, 2026
- Exhibit L:** Verizon Wireless Responses to Comments, Vol. 2, February 6, 2026
- Exhibit M:** Verizon Wireless Responses to Comments, Vol. 3, February 24, 2026
- Exhibit N:** Photographs of Adjacent Utility Poles North and South on Carmelo Street
- Exhibit O:** PierCon Solutions Radio Frequency Supplemental Report #4, February 23, 2026

Site Plans

Verizon Wireless South Carmel 001



verizon[✓]

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 9459



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

[illegible]

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

SHEET TITLE

TITLE SHEET

SHEET NUMBER

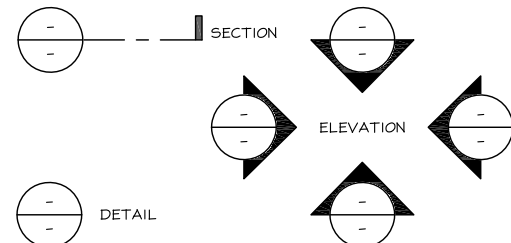
T-1

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.

- 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

The left side of the figure shows a photograph of a utility pole with multiple cross-arms and wires, situated in a residential area with trees and a sidewalk. The right side is a map of the study area, showing a grid of streets including 9th Ave, 10th Ave, 11th Ave, San Antonio Ave, Carmelo St, and Camino Real. A red pin labeled "SITE" is located on Carmelo St between 10th Ave and 11th Ave. A north arrow is located in the bottom right corner of the map.

ADD'L	ADDITIONAL	L.	LONG(TUDINAL)
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
BTWN.	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)
E.M.T.	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



	CONCRETE (SURFACE)	— X —	CHAIN LINK FENCE
	CONCRETE (CUT)	□ — □	WOOD FENCE
	EARTH	○ — ○	WROUGHT IRON FENCE
	GRAVEL	— OH —	OVERHEAD WIRES
	PLYWOOD	— E —	POWER CONDUIT
	STEEL	— · · — · · —	GROUND CONDUCTOR
	EXISTING GRASS	— - - —	PROPERTY LINE
	ELEVATION DATUM	— — —	CENTERLINE

APPLICANT:
VERIZON WIRELESS
2770 SHADELANDS DR.
BUILDING 11
WALNUT CREEK, CA 9459

POLE OWNER:
PG&E / AT&T

ZONING CONTACT:
SEQUOIA DEVELOPMENT
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 9459
CONTACT: DEWAYNE BONHAM
PHONE: (558) 974-7012
EMAIL: dewayne.bonham@verizonwireless.com

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

CONSTRUCTION MANAGER:
SEQUOIA DEVELOPMENT
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 DEVELOPMENT
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

LATITUDE: 36° 32' 57.58" N (36.549328)	JURISDICTION: CITY OF CARMEL BY THE SEA
LONGITUDE: 121° 55' 36.86" W (-121.926906)	ADJACENT APN: 010-275-012-000
ELEVATION: 80.22' AMSL	PROPERTY LEGAL DESCRIPTION: N/A - PUBLIC RIGHT OF WAY
ZONING: R-1	ADA COMPLIANCE: N/A
LAND USE: TBD	OCCUPANCY CLASSIFICATION: N/A

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

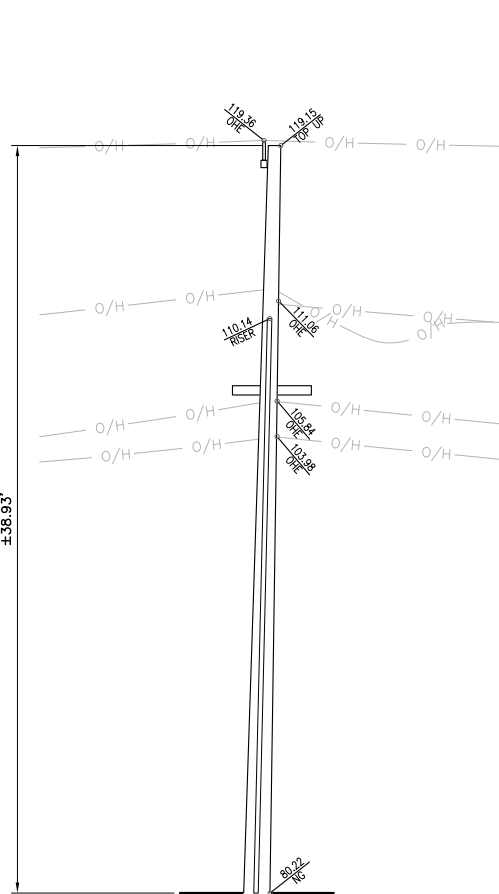
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☐ SIGNAGE: FCC MANDATED RF WARNING SIGNAGE SHALL FACE OUT TO STREET AND IN CLIMBING SPACE PER VZW REQUIREMENTS

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.

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 |
| XXX | SPOT ELEVATION | EOP | EDGE OF PAVEMENT |
| ⊙ | WATER VALVE | R.O.W. | RIGHT OF WAY |
| ⊙ | FOUND MONUMENT | R/W | RIGHT OF WAY |
| ⊕ | GEODETIC 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 |

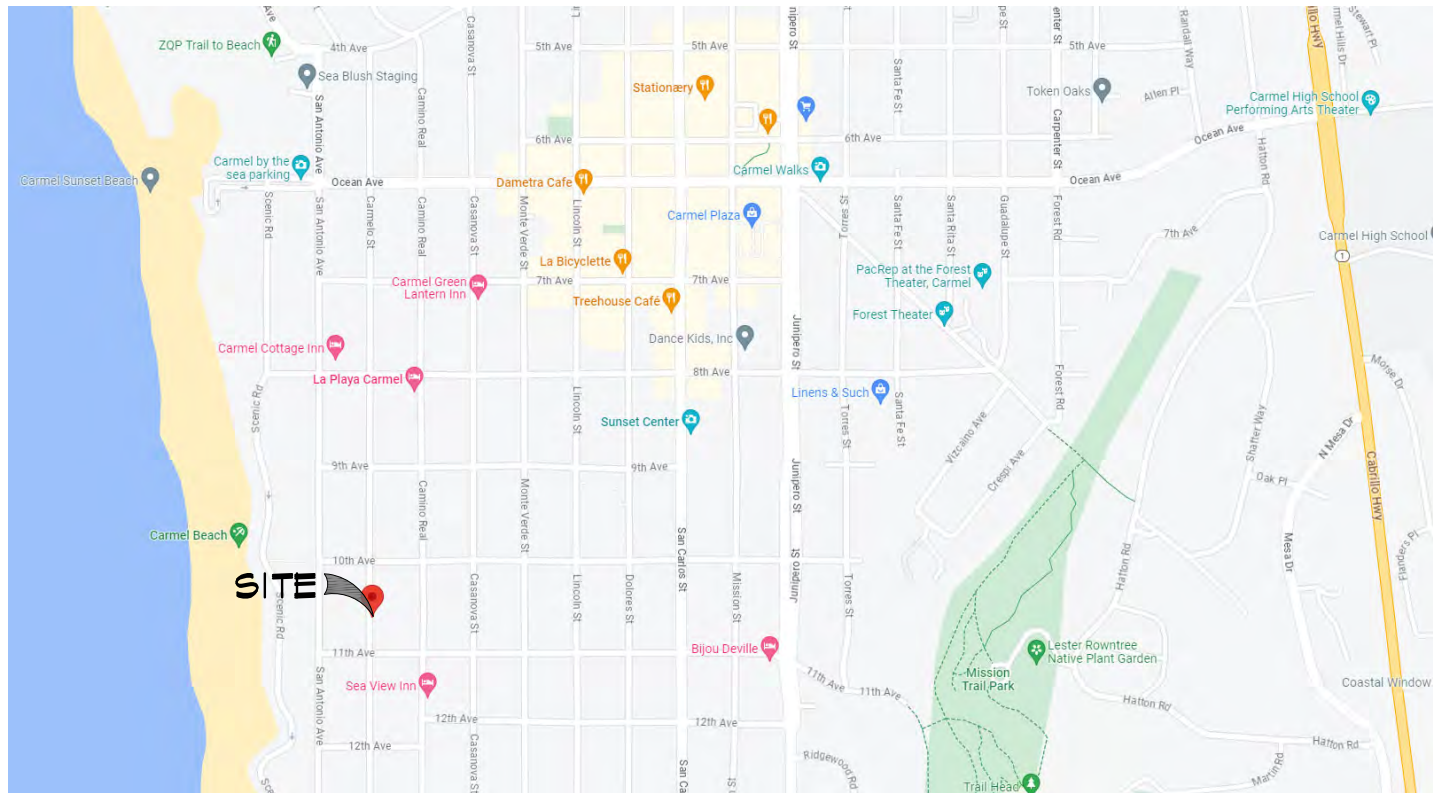
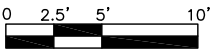
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NOT APPLICABLE (RIGHT-OF-WAY)

LEGAL DESCRIPTION
NOT APPLICABLE (RIGHT-OF-WAY)

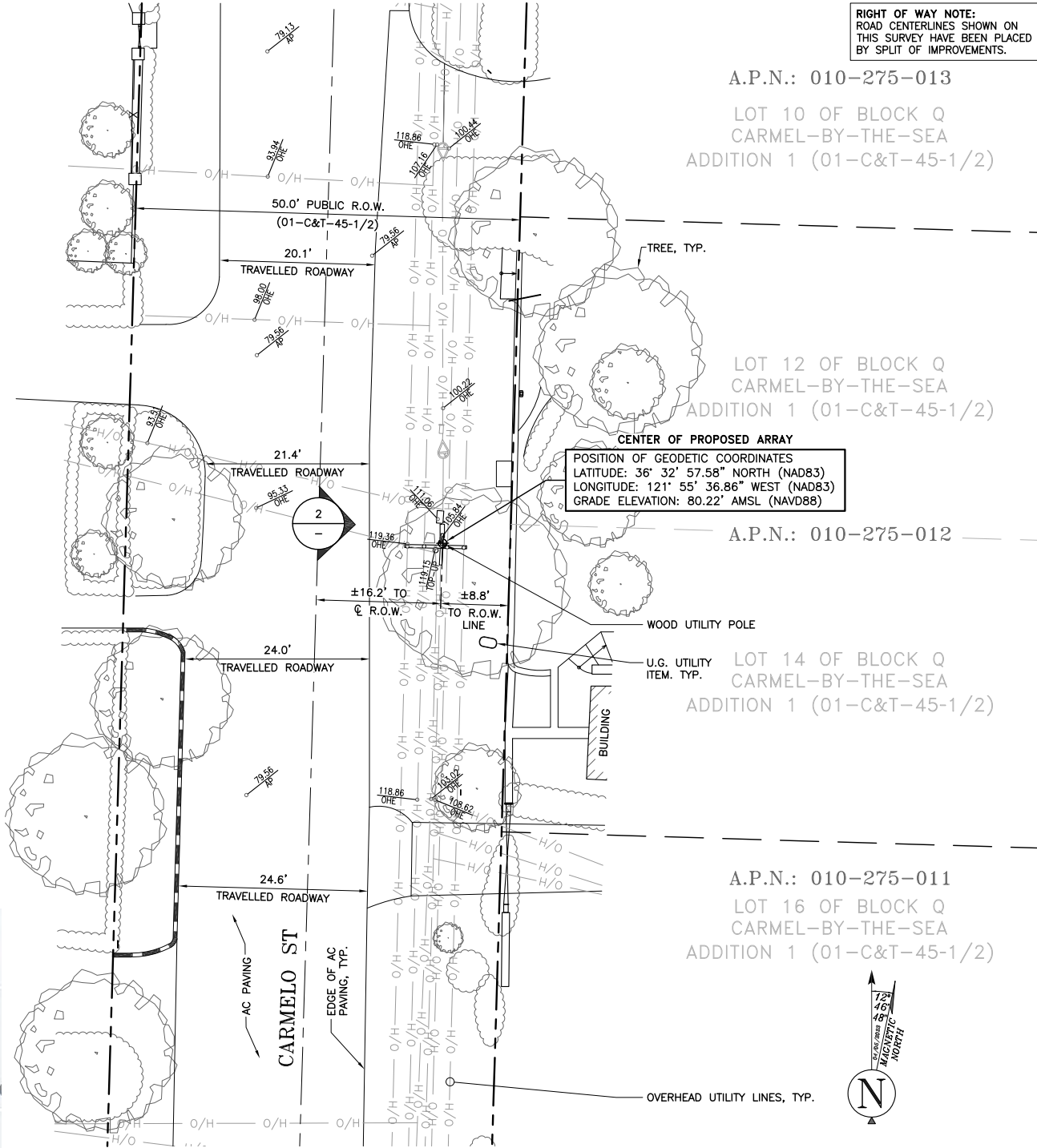
ASSESSOR'S PARCEL NO.
NOT APPLICABLE (RIGHT-OF-WAY)

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.

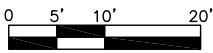
② POLE ELEVATION
1 inch = 5ft.



VICINITY MAP



① POLE LOCATION
1 inch = 10ft.



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

RIGHT OF WAY NOTE:
ROAD CENTERLINES SHOWN ON THIS SURVEY HAVE BEEN PLACED BY SPLIT OF IMPROVEMENTS.

A.P.N.: 010-275-013

LOT 10 OF BLOCK Q
CARMEL-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

LOT 12 OF BLOCK Q
CARMEL-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

LOT 14 OF BLOCK Q
CARMEL-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

A.P.N.: 010-275-011
LOT 16 OF BLOCK Q
CARMEL-BY-THE-SEA
ADDITION 1 (01-C&T-45-1/2)

ATTACHMENT 8

verizon

2785 MITCHELL DRIVE, SUITE 9
WALNUT CREEK, CA 94598

SEQUOIA
DEPLOYMENT SERVICES, INC.

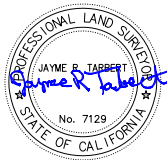
1 SPECTRUM POINTE DRIVE, SUITE 130
LAKE FOREST, CA 92630

ALLSTATES
ENGINEERING & SURVEYING

23675 BIRTCHE DRIVE
LAKE FOREST, CA 92630

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

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



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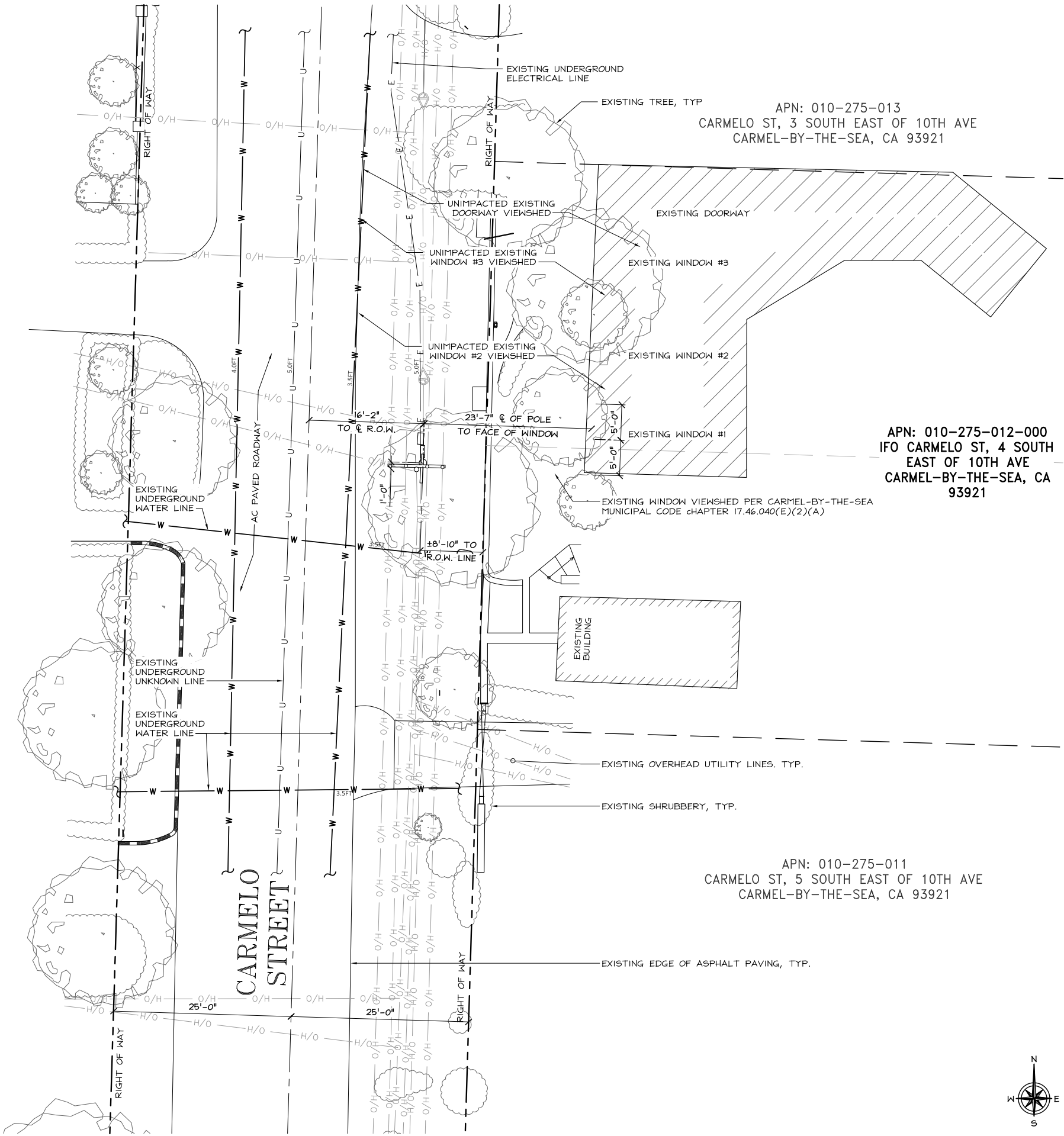
**SOUTH CARMEL OPTION 2
RIGHT-OF-WAY SITE:
CARMELO STREET
CARMEL-BY-THE-SEA, CA 93921
NEW BUILD-SMALL CELL**

SHEET TITLE

SITE SURVEY

SHEET NUMBER

C-1



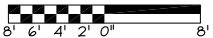
APN: 010-275-013
CARMELO ST, 3 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921

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

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



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



verizon
2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 94591

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

ALLSTATES
ENGINEERING & SURVEYING
23675 BIRCHER DRIVE
LAKE FOREST, CA 92630

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

REV	DATE	DESCRIPTION	
4	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

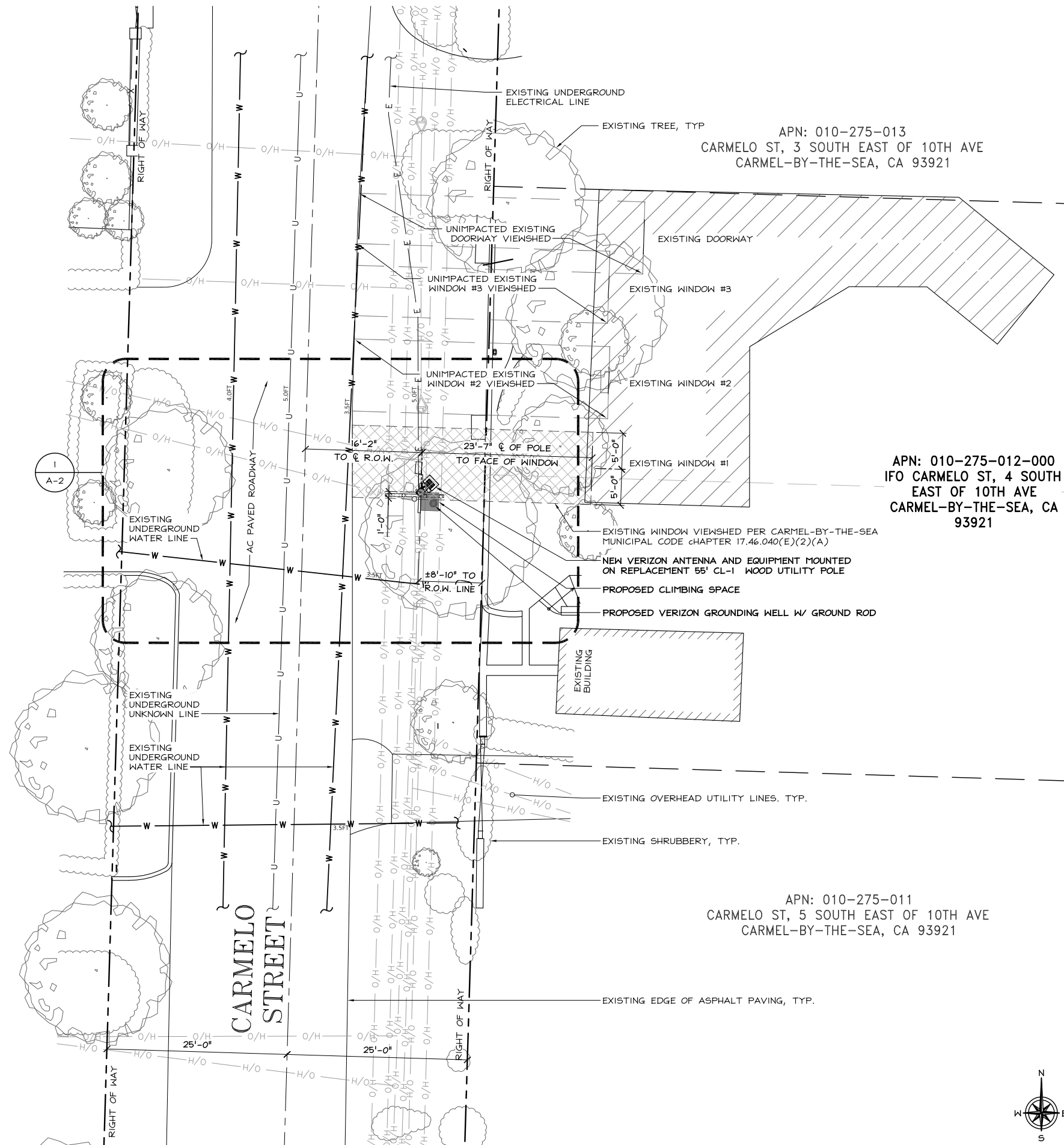
IT IS A VIOLATION OF LAW FOR ANY PERSON,
UNLESS THEY ARE ACTING UNDER THE
DIRECTION OF A LICENSED PROFESSIONAL
ENGINEER, TO ALTER THIS DOCUMENT.

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

SHEET TITLE
SITE PLAN

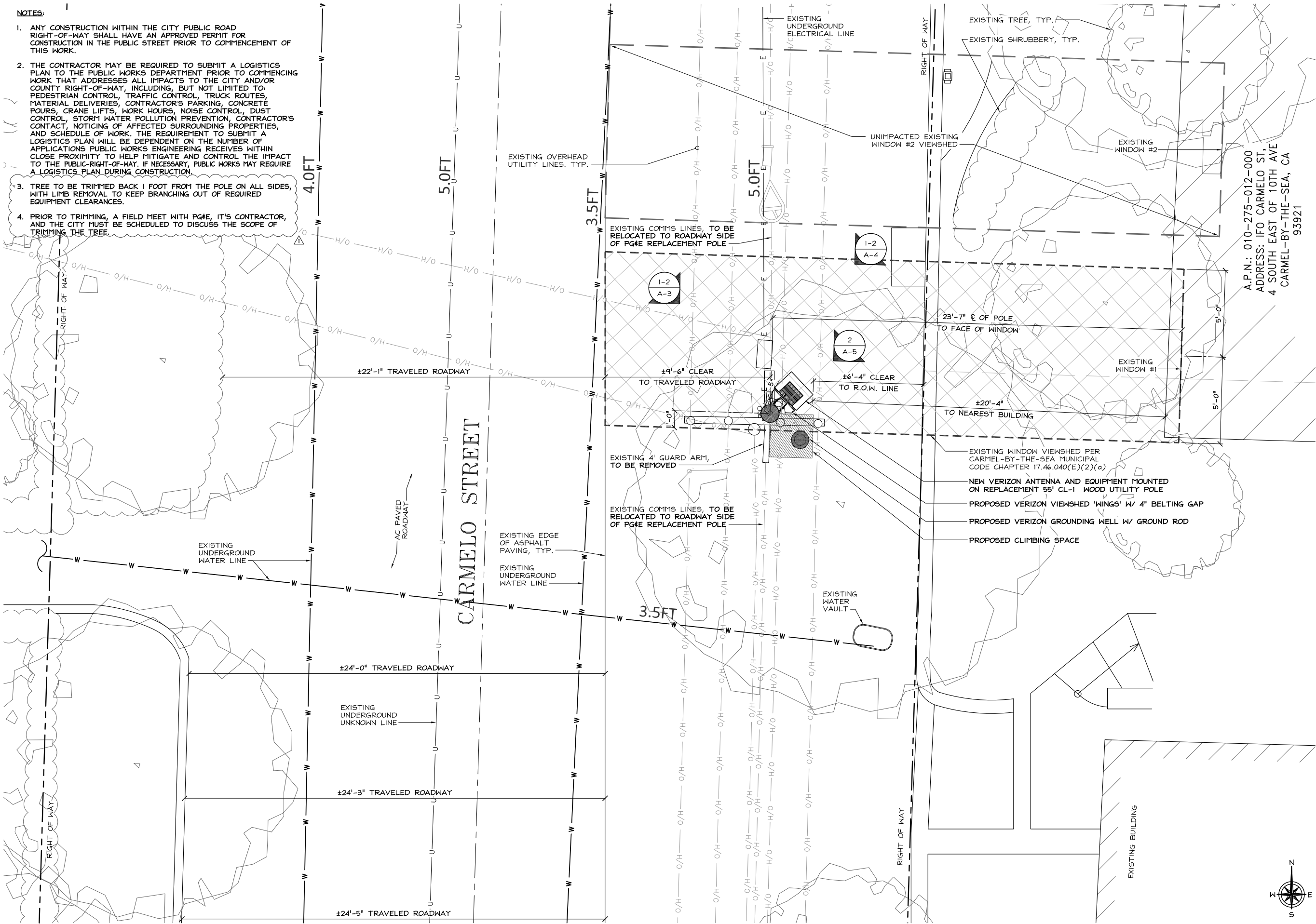
SHEET NUMBER
A-0

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.



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

- 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, CONTRACTORS PARKING, CONCRETE POURS, CRANE LIFTS, WORK HOURS, NOISE CONTROL, DUST CONTROL, STORM WATER POLLUTION PREVENTION, CONTRACTORS 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.



ENLARGED SITE PLAN

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



1

ATTACHMENT 8

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

SHEET TITLE
ENLARGED SITE PLAN

SHEET NUMBER
A-2

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 9459



1 SPECTRUM POINTE DRIVE, SUITE 130
LAKE FOREST, CA 92450-2222



23675 BIRTCHER DRIVE
LAKE FOREST, CA 92630

PROJECT ID: TBD

DRAWN BY: MA

CHECKED BY: DW

	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFD's)	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
REV	DATE	DESCRIPTION	



71655

★ STATE CIVIL

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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

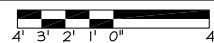
ELEVATIONS

SHEET NUMBER

A-3

EXISTING NORTHWEST ELEVATION

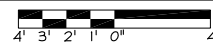
24"x36" SCALE: 1/4" = 1'-0"
11"x17" SCALE: 1/8" = 1'-0"



2

PROPOSED NORTHWEST ELEVATION

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



1

2770 SHADELANDS DR. BUILDING II
WALNUT CREEK, CA 9459

1 SPECTRUM POINTE DRIVE, SUITE 130
LAKE FOREST CA 92630-2283

23675 BIRTCHER DRIVE
LAKE FOREST, CA 92630

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

[illegible]

m/Alah

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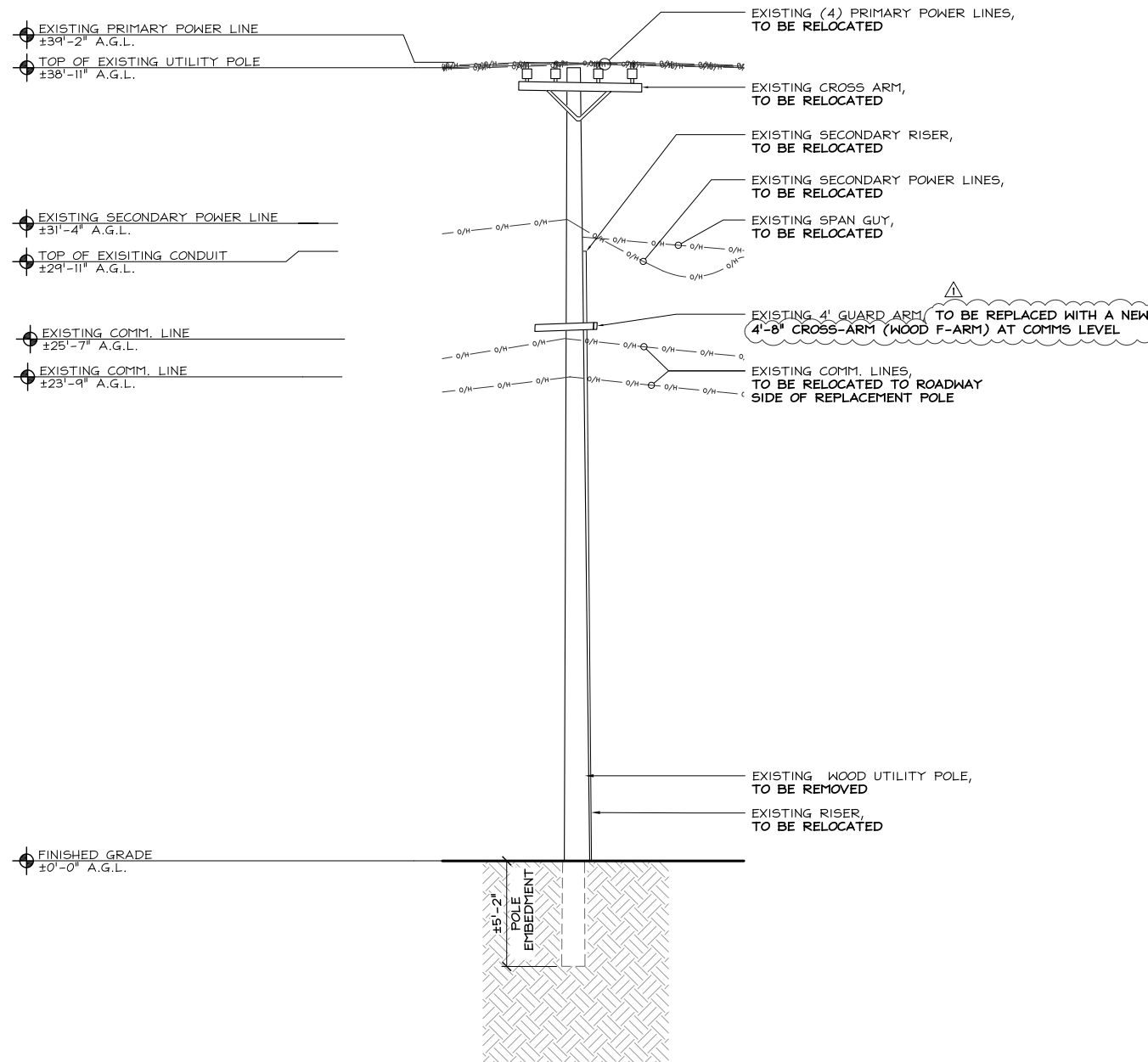
SC001 CARMELO STONEWALL (OPT.2)
PUBLIC R.O.W. ADJACENT TO:
IFO CARMELO ST, 4 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

SHEET TITLE

ELEVATIONS

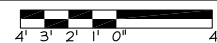
SHEET NUMBER

A-4

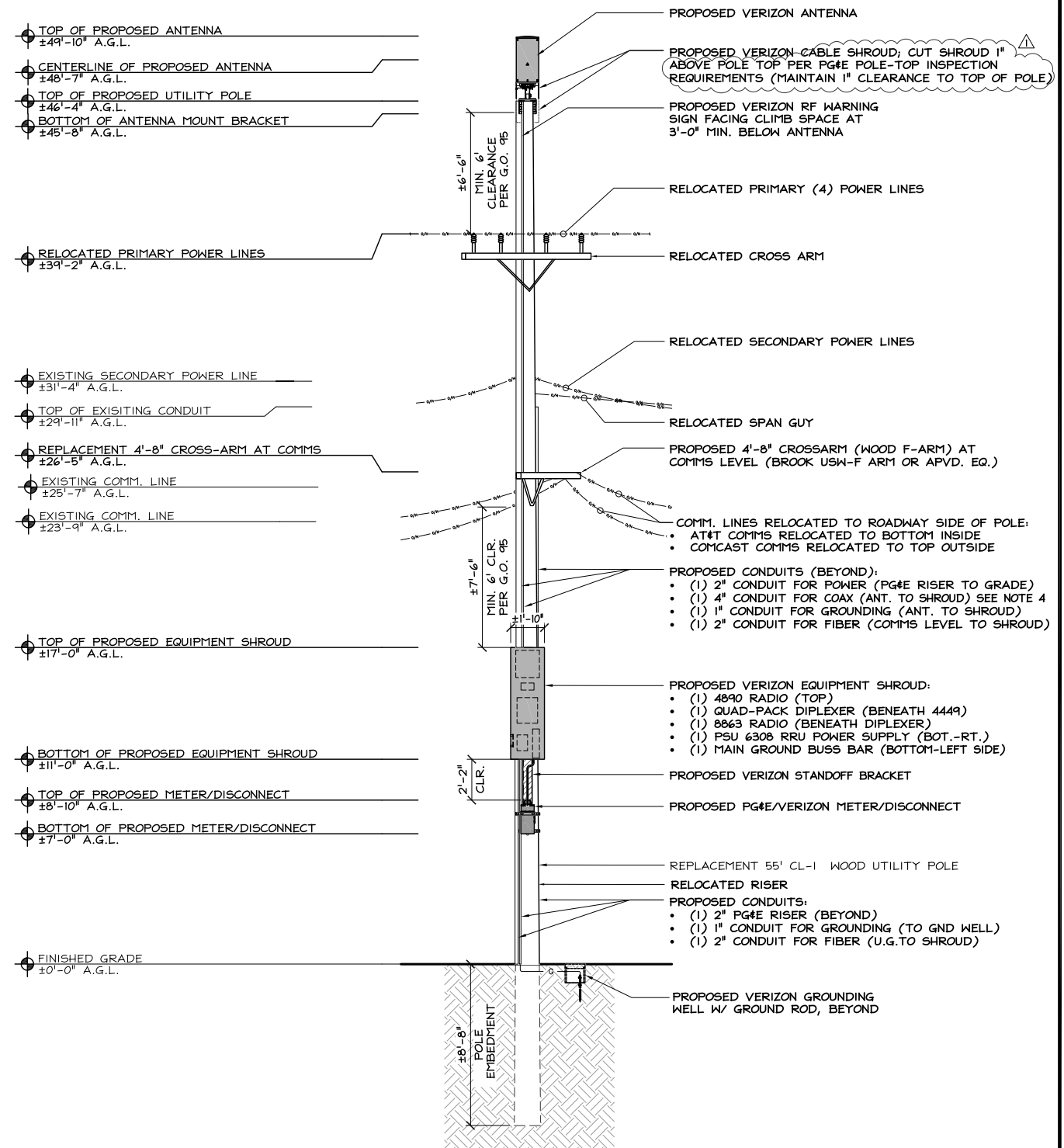


EXISTING NORTHEAST ELEVATION

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

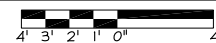


2



PROPOSED NORTHEAST ELEVATION

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



1

1. 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.
2. INSTALL CLIMBING PEGS AS REQUIRED PER G.O.95



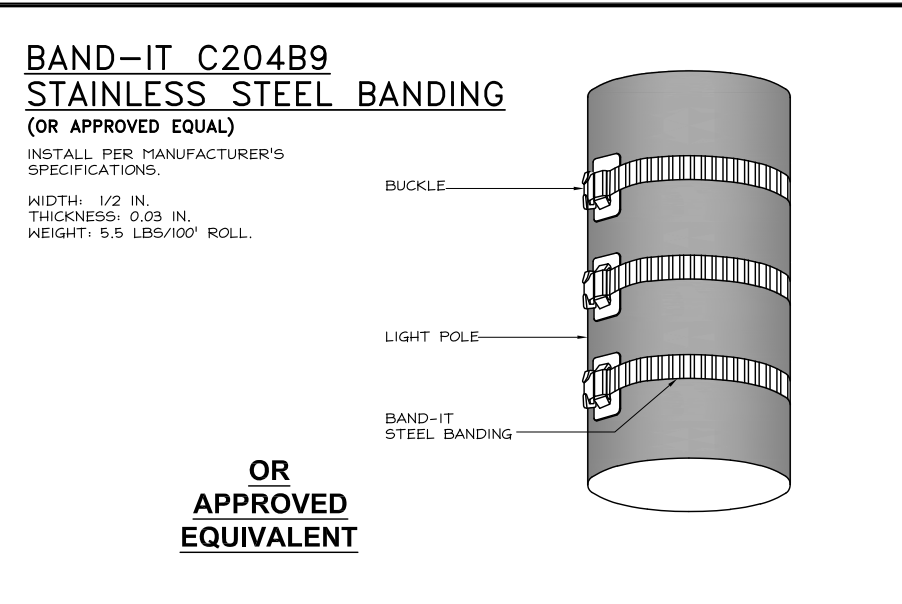
24"x36" SCALE: 1"=1'-0"
11"x17" SCALE: 1/2"=1'-0"

2

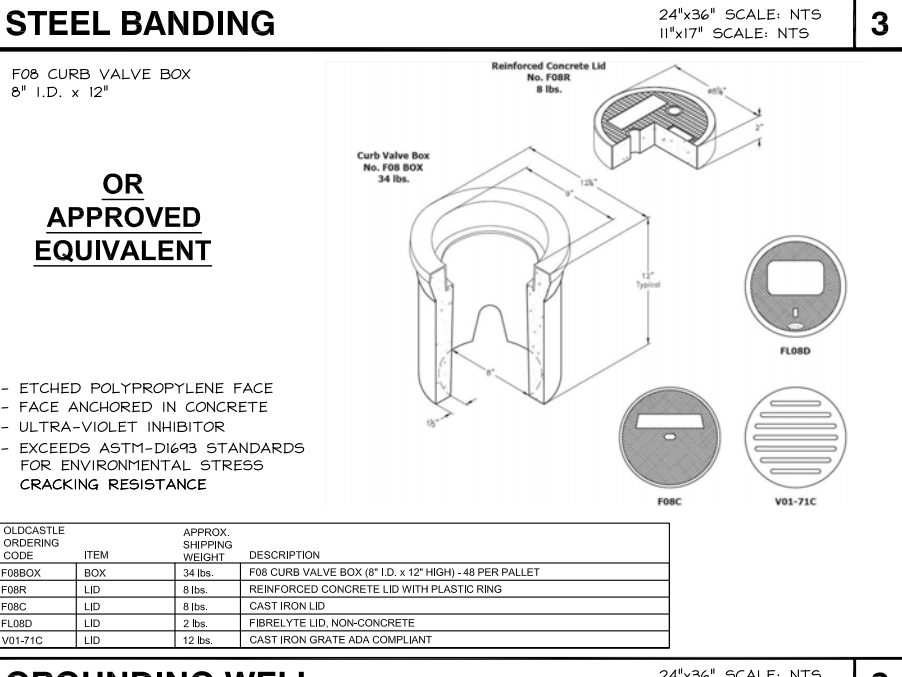


24"x36" SCALE: NTS
11"x17" SCALE: NTS

—



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



CUSTOMER ASSEMBLY GUIDE

CONTRACTOR NOTE:

- SITE ID WILL BE SWITCH #, SITE # AND SITE NAME.
- NODE NUMBER WILL BE MARKET#-NODE.B#-SMALL CELL NAME.

NOTES:

1. STAINLESS STEEL HARDWARE TO HAVE ANTISEIZE LUBRICANT APPLIED BEFORE ASSEMBLY.

ITEM NO.	QTY.	DESCRIPTION
1	1	ASSY. SHROUD HALF, SINGLE HOLE
2	1	ASSY. SHROUD HALF, DOUBLE HOLE
3	3	PEM ASSY. SHROUD ARM
4	13	ASSY. WASHER, SEALING, 1/4", 18-8 SS, 1" O.D., PHMS, 1/4"-20 X 3/4" LG, 18-8 SS

(OR APPROVED EQUAL)

The diagram illustrates the installation of a new phenolic sign on a panel door. On the left, a rectangular sign is shown with a double-line border. The sign's dimensions are 18 inches high and 5 inches wide. The text on the sign is as follows:

NON-EMERGENCY NODE SITE POWER SHUT DOWN PROCEDURES

1. FOR NON-EMERGENCY/SCHEDULED POWER SHUT DOWN:

CALL VERIZON (800) 264-6620 24 HOURS PRIOR TO SCHEDULED POWER SHUT OFF

PROVIDE THE FOLLOWING INFORMATION:

INFORMATION:

SITE NUMBER: 500081318 / SC001 CARMELO STONEWALL (OPT.2)

YOUR NAME AND REASON FOR POWER SHUT-OFF

PROVIDE DURATION OF OUTAGE

PULL DISCONNECT HANDLE OR BREAKERS TO 'OFF' POSITION

POWER SHUT OFF VERIFICATION WITH YOUR APPROVED COMPANY PROCEDURES

NOTIFY VERIZON UPON COMPLETION OF WORK

RESTORE POWER BY PLACING POWER DISCONNECT HANDLE OR BREAKERS IN THE 'ON' POSITION

REINSTALL LOCK ON POWER HANDLE OR BREAKER BOX

2. EMERGENCY POWER SHUTOFF

CALL VERIZON (800) 264-6620

PROVIDE THE FOLLOWING INFORMATION:

SITE NUMBER: 500081318 / SC001 CARMELO STONEWALL (OPT.2)

YOUR NAME AND REASON FOR POWER SHUT-OFF

PROVIDE DURATION OF OUTAGE

PULL DISCONNECT HANDLE OR BREAKERS TO 'OFF' POSITION

POWER SHUT OFF VERIFICATION WITH YOUR APPROVED COMPANY PROCEDURES

NOTIFY VERIZON UPON COMPLETION OF WORK

RESTORE POWER BY PLACING POWER DISCONNECT HANDLE OR BREAKERS IN THE 'ON' POSITION

REINSTALL LOCK ON POWER HANDLE OR BREAKER BOX

NOTE:
NEW PHENOLIC SIGN TO BE ATTACHED TO PANEL.

On the right, a perspective view of a panel door is shown. The door is labeled "NEMA 3R RAIN COVER". It features a "DISCONNECT SWITCH" and a "PANEL DOOR WITH LATCH-LOOP (LOCKABLE)". A line points from the sign to the door, indicating where it should be attached. Another line points from the "OUTSIDE PANEL DOOR SHOWING DISCONNECT SWITCH ID ON PLAQUE" to the switch area. A third line points from the "DISCONNECT SWITCH" label to the switch itself. A fourth line points from the "PANEL DOOR WITH LATCH-LOOP (LOCKABLE)" label to the latch mechanism.

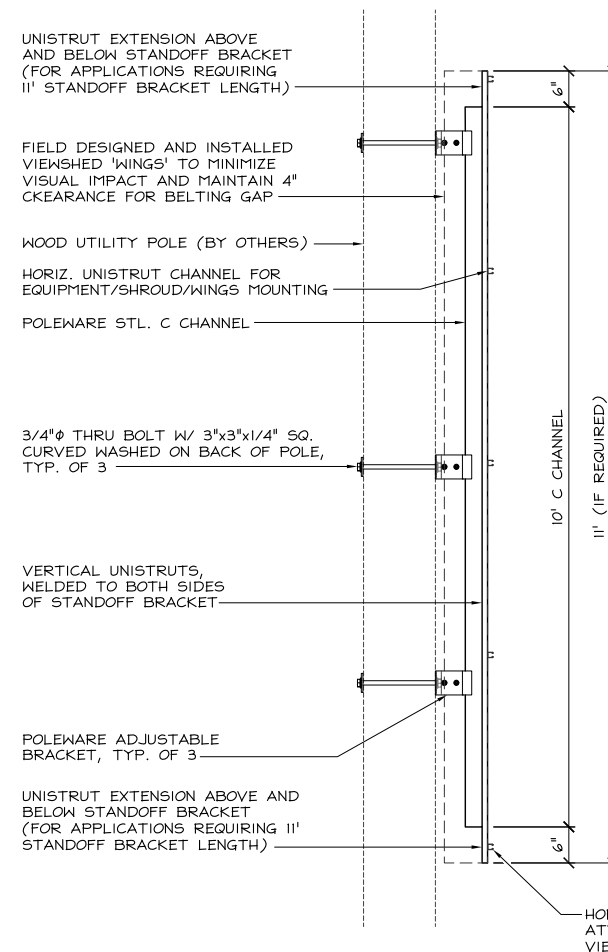
	
IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.	
SC0001 CARMELO STONEWALL (OPT.2) PUBLIC R.O.W. ADJACENT TO: 1FO CARMELO ST, 4 SOUTH EAST OF 10TH AVE CARMELO-BY-THE-SEA, CA 93921 MDG NUMBER: 5000081318	
SHEET TITLE EQUIPMENT DETAILS	
SHEET NUMBER D-2	

SHUTDOWN SIGN ON DISCONNECT	24"x36" SCALE: NTS 11"x17" SCALE: NTS	1
------------------------------------	--	----------

NOT USED

2

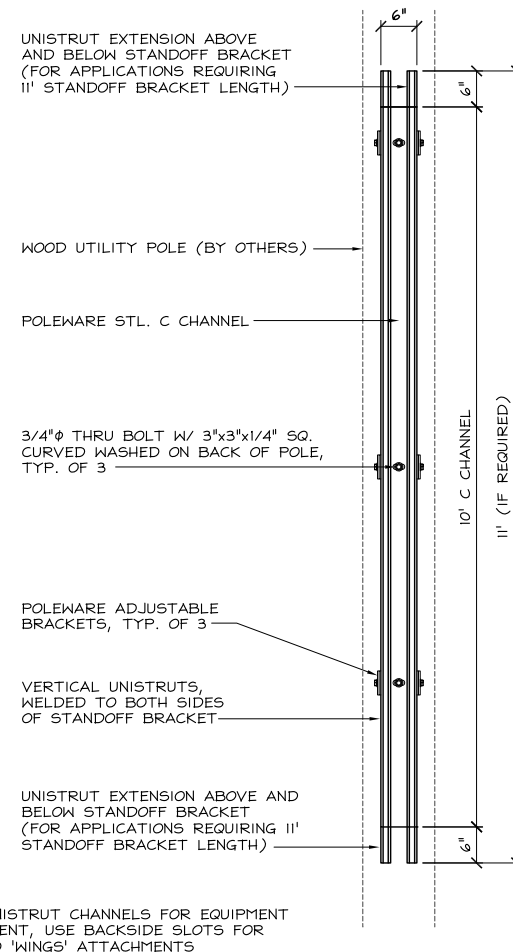
STANDOFF BRACKET SIDE ELEVATION



NOTE:

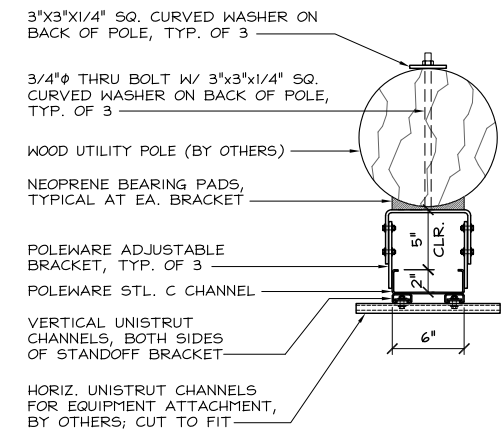
1. STANDOFF BRACKET MODEL #PW-SOB-120L-ST-SP AS MFG. BY POLEWARE, LLC, (475) 215-5119, OR APPROVED EQUAL.
2. LENGTH VARIES. CUSTOMER TO SPECIFY BRACKET LENGTH AT TIME OF ORDER.
3. ALL COMPONENTS TO BE SHOP PRIME PAINTED.
4. UNISTRUT COMPONENTS TO BE MFG BY UNISTRUT CORPORATION, 1140 THORNDALE AVE., ITASCA IL, 60143, (800) 468-9510.
5. HORIZONTAL UNISTRUTS FOR EQUIPMENT INSTALLATION NOT INCLUDED.
6. NEOPRENE PADS AND ALL HARDWARE INCLUDED.
7. ALLOW 2-3 WEEKS FOR FABRICATION.
8. PATENT PENDING

STANDOFF BRACKET FRONT ELEVATION



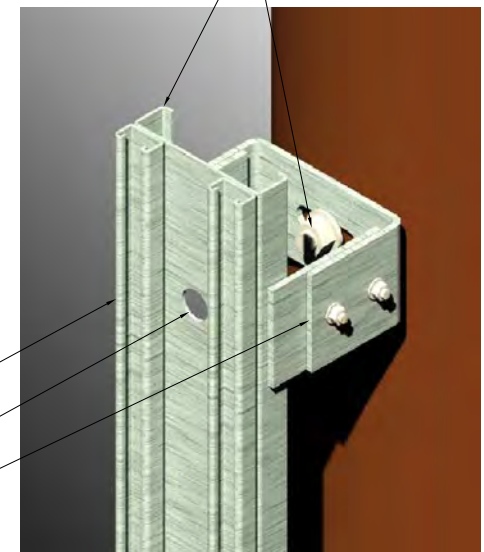
OR
APPROVED
EQUIVALENT

STANDOFF BRACKET PLAN



3/4"Ø THRU BOLT, TYP. OF 3

POLEWARE STL. C CHANNEL—



VERTICAL UNISTRUT
CHANNELS, BOTH SIDES OF
STANDOFF BRACKET _____

1-5/8" ACCESS HOLE,
ALIGNED WITH THRU BOLTS

POLEWARE FIXED BRACKET,
TYP. OF 3 _____

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

1

NOT USED

3

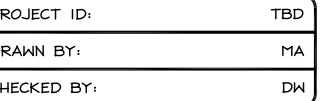
STANDOFF BRACKET (OR APPROVED EQUAL)

SC001 CARMELO STONEWALL (OPT.2)
PUBLIC R.O.W. ADJACENT TO:
1FO CARMELO ST, 4 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

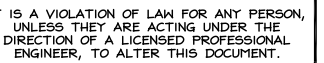
SHEET TITLE
EQUIPMENT DETAILS

SHEET NUMBER

D-3



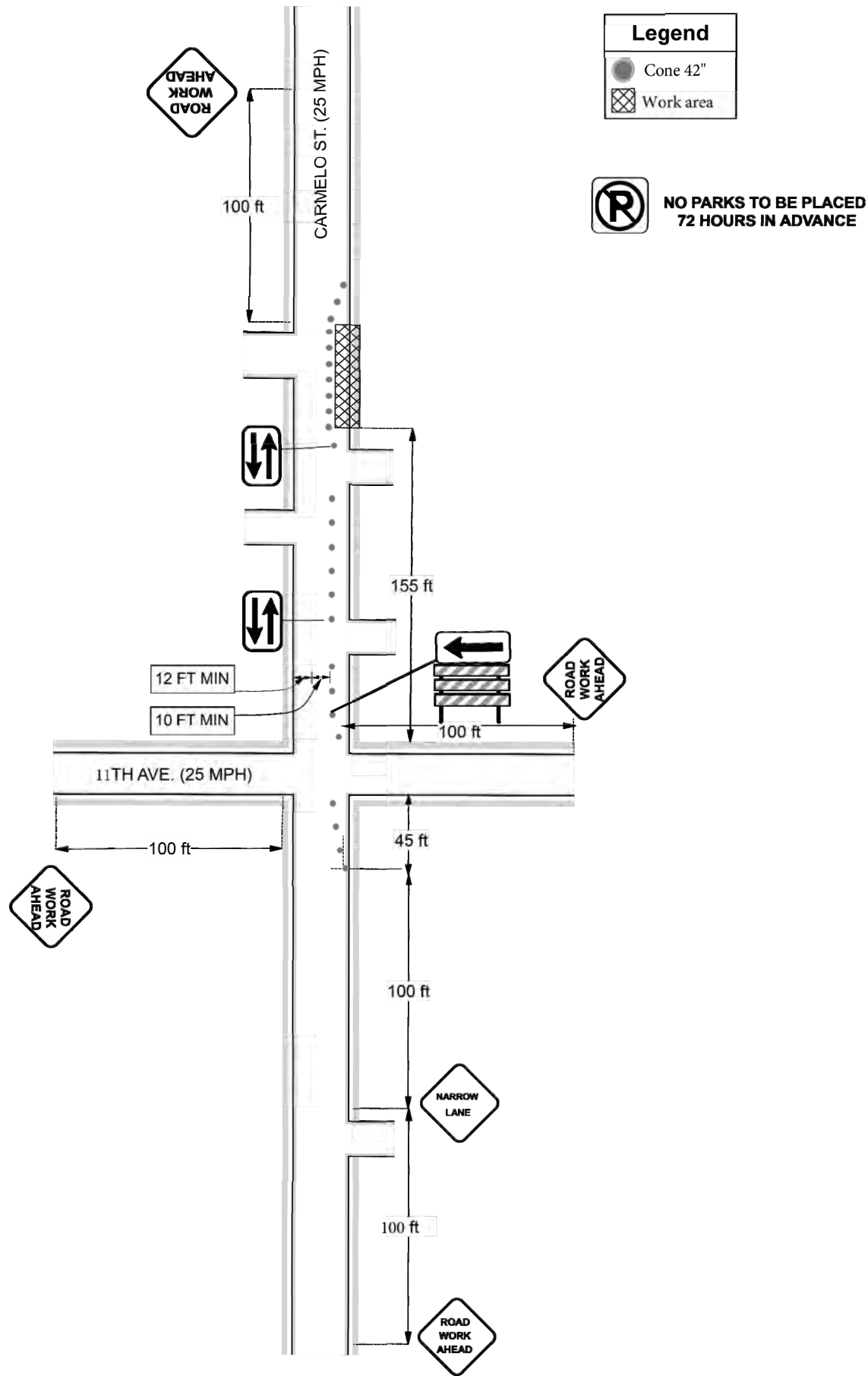
A	10/30/2025	100% CD (PCC-1)	NC
4	11/12/2024	100% CD (NEW RFDS)	NC
B	10/21/2024	100% CD's (VIEWSHED)	NC
3	07/01/2024	100% CD's (ANTENNA CHG.)	NC
2	06/17/2024	100% CD's (RADIO UPDATE)	NC
1	06/06/2023	100% CD's FOR SUBMITTAL	NC
O	04/27/2023	90% CD's FOR REVIEW	NC
EV	DATE	DESCRIPTION	



C001 CARMELO STONEWALL (OPT.2)
PUBLIC R.O.W. ADJACENT TO:
C001 CARMELO ST, 4 SOUTH EAST OF 10TH AVE
CARMEL-BY-THE-SEA, CA 93921
MDG NUMBER: 5000081318

SHEET TITLE
TRAFFIC CONTROL PLAN

SHEET NUMBER
TCP-1



PLAN NOTES:

1. 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.
2. EXTEND CHANNELIZATION DEVICES INTO SHOULDER WHERE APPLICABLE.
3. 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.
4. SHOULDER TAPERS SHOULD BE 1/3 OF THE ON-STREET TAPER LENGTH.
5. MAINTAIN A MINIMUM LANE WIDTH OF 10'.

POSTED SPEED (MPH)	DISTANCE BETWEEN SIGNS			TAPER	BUFFER
	A	B	C	L	E
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.



3. ALL TEMPORARY TRAFFIC CONTROL SIGNAGE, LAYOUTS, AND PROCEDURES SHALL COMPLY WITH LOCAL JURISDICTIONAL REQUIREMENTS AND MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES (MUTCD), LATEST EDITION, WHICHEVER IS MORE STRINGENT.
2. PRIOR TO ANY ROAD CONSTRUCTION, TRAFFIC CONTROL SIGNS AND DEVICES SHALL BE IN PLACE.
3. TRAFFIC CONTROL DEVICES FOR LANE CLOSURES INCLUDING SIGNS, CONES, BARRICADES, ETC. SHALL BE PLACED AS SHOWN ON PLANS. SIGNS SHALL NOT BE PLACED WITHOUT ACTUAL LANE CLOSURES AND SHALL BE IMMEDIATELY REMOVED UPON REMOVAL OF THE CLOSURES.
4. SELECTION, PLACEMENT, MAINTENANCE, AND PROTECTION OF TRAFFIC, PEDESTRIANS, AND WORKERS SHALL BE IN ACCORDANCE WITH THE MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES (MUTCD) - PART VI "TEMPORARY TRAFFIC CONTROL", AND LOCAL JURISDICTIONAL REQUIREMENTS UNLESS OTHERWISE NOTED IN THE PLANS AND SPECIFICATIONS, AND SHALL BE APPROVED BY THE APPROPRIATE HIGHWAY AUTHORITY HAVING JURISDICTION.
5. ADVANCE WARNING SIGNS, DISTANCES, AND TAPER LENGTHS MAY BE EXTENDED TO ADJUST FOR REDUCED VISIBILITY DUE TO HORIZONTAL AND VERTICAL CURVATURE OF THE ROADWAY AND FOR ACTUAL TRAFFIC SPEEDS IF IN EXCESS OF POSTED SPEED LIMITS.
6. TAPERS SHALL BE LOCATED TO MAXIMIZE THE VISIBILITY OF THEIR TOTAL LENGTH.
7. CONFLICTING OR NON-OPERATING SIGNAL INDICATIONS ON THE (E) TRAFFIC SIGNAL SYSTEMS SHALL BE BAGGED OR COVERED.
8. ALL (E) ROAD SIGNS, PAVEMENT MARKINGS AND/OR PLOWABLE PAVEMENT REFLECTORS WHICH CONFLICT WITH THE (N) TRAFFIC CONTROL PLAN SHALL BE COVERED, REMOVED, OR RELOCATED. ALL TRAFFIC CONTROL DEVICES SHALL BE RESTORED TO MATCH PRE-CONSTRUCTION CONDITION AFTER COMPLETION OF WORK.
9. CONTRACTOR SHALL CONTACT LOCAL AUTHORITY HAVING HIGHWAY JURISDICTION AND PROVIDE ADDITIONAL "FLAGMEN" OR POLICE SUPERVISION, IF REQUIRED.
10. ALL EXCAVATED AREAS WITHIN OR ADJACENT TO THE ROADWAY SHALL BE BACKFILLED AND PLACED ON A MINIMUM 6H:1V SLOPE PRIOR TO END OF EACH WORK DAY. OTHER EXCAVATED AREAS WITHIN THE CLEAR ZONE ARE TO BE EITHER BACKFILLED OR PRECAST CONCRETE CURB BARRIER CONSTRUCTION BARRIER SET TEMPORARILY IN PLACE TO SHIELD VEHICULAR AND PEDESTRIAN TRAFFIC.
11. WHERE DICTATED BY LOCAL CONDITIONS, THE CONTRACTOR SHALL MAKE PROVISIONS FOR MAINTAINING PEDESTRIAN AND WORKER CROSSING LOCATIONS IN ACCORDANCE WITH ALL APPLICABLE CODES AND OSHA REQUIREMENTS.
12. CONSTRUCTION ZONE SPEED LIMIT IF REDUCED FROM POSTED LIMITS SHALL BE IN ACCORDANCE WITH MUTCD AND WILL BE DETERMINED BY THE AUTHORITY HAVING JURISDICTION.
13. THERE SHALL BE NO WORKERS, EQUIPMENT, OR OTHER VEHICLES IN THE BUFFER SPACE OR THE ROLL AHEAD SPACE.
14. DRIVENAYS AND/OR SIDE STREETS ENTERING THE ROADWAY AFTER THE FIRST ADVANCE WARNING SIGN SHALL BE PROVIDED WITH AT LEAST ONE W20-1 SIGN (ROAD WORK AHEAD) AS A MINIMUM.
15. CONES MAY BE SUBSTITUTED FOR DRUMS AND INSTALLED UPON THE APPROVAL OF THE AUTHORITY HAVING JURISDICTION PROVIDED THEY COMPLY WITH MUTCD.
16. THE SPACING BETWEEN CONES, TUBULAR MARKERS, VERTICAL PANELS, DRUMS, AND BARRICADES SHOULD NOT EXCEED A DISTANCE IN FEET EQUAL TO 1.0 TIMES THE SPEED LIMIT IN MPH WHEN USED FOR TAPER CHANNELIZATION, AND A DISTANCE IN FEET EQUAL TO 2.0 TIMES THE SPEED LIMIT IN MPH WHEN USED FOR TANGENT CHANNELIZATION.
17. WHEN CHANNELIZATION DEVICES HAVE THE POTENTIAL OF LEADING VEHICULAR TRAFFIC OUT OF THE INTENDED VEHICULAR TRAFFIC SPACE, THE CHANNELIZATION DEVICES SHOULD BE EXTENDED A DISTANCE IN FEET OF 2.0 TIMES THE SPEED LIMIT IN MPH BEYOND THE DOWNSTREAM END OF THE TRANSITION AREA.
18. TAPER LENGTHS ARE CALCULATED AS FOLLOWS:
 $L = WS^2/60$ (40 MPH AND HIGHER) OR $L = WS$ (OVER 40 MPH),
WHERE W = OFFSET WIDTH (FT), S = TRAFFIC SPEED (MPH).
19. THE CONTRACTOR SHALL PROVIDE FOR ACCESS TO ALL ADJACENT PROPERTIES DURING WORK HOURS. CONSTRUCTION OPERATIONS SHALL BE CONDUCTED IN SUCH A MANNER AS TO CAUSE AS LITTLE INCONVENIENCE AS POSSIBLE TO ABUTTING PROPERTY OWNERS/OPERATORS.
20. FLASHING YELLOW BEACONS SHALL BE USED ON ALL W20-1 SIGNS AND ALL TYPE II BARRICADES GUARDING THE WORK AREA OVERNIGHT.
21. ALL SIGNS SHALL BE REFLECTORIZED AND STANDARD SIZE.
22. THE CONTRACTOR SHALL HAVE ALL SIGNS, DELINEATORS, BARRICADES, ETC., PROPERLY INSTALLED PRIOR TO COMMENCING CONSTRUCTION, WHEN ROAD WORK SPEED LIMIT SIGN IS PROPOSED (I.E., C17), THE CONTRACTOR SHALL COVER ALL CONFLICTING REGULATORY SPEED LIMIT SIGNS.
23. THE CONTRACTOR SHALL PROVIDE FOR SAFE PEDESTRIAN ACCESS AT ALL TIMES.

1. 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.
2. EXTEND CHANNELIZATION DEVICES INTO SHOULDER WHERE APPLICABLE.
3. DISTANCES AS INDICATED IN TABLE I 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.
4. SHOULDER TAPERS SHOULD BE 1/3 OF THE ON-STREET TAPER LENGTH.
5. MAINTAIN A MINIMUM LANE WIDTH OF 10'.

- - CONE OR DELINEATOR
- - WORK AREA
- - FLAGGER
- - SIGN
- - ROAD STEEL PLATE

W4-2	C30A (CA)	W20-4	W1-3 (LT)	W3-4
W24-1	W21-5	C12 (CA)	W1-3 (RT)	W1-4 (LT)
C9A (CA)	W21-7	R9-11	SC11 (MOD)	W1-6
M4-9a	M4-9b	C30	W20-1	W6-4
C20 (BIKE)	W11-1 / W16-1	R9-9	G20-2	

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

Exhibit B**Verizon Wireless's Responses Volume 1**

<u>Topic</u>	<u>Page</u>
1. Compliance With Code Requirements	1
2. Gap	1
3. Design	3
4. Location	4
5. Property Values	5
6. Environmental Review	6

1. COMPLIANCE WITH CODE REQUIREMENTS

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.

2. GAP

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.”¹ 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 Map² 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

¹ Available at: www.verizon.com/coverage-map.

² 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.

3. DESIGN

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.

4. LOCATION

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.

5. PROPERTY VALUES

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.³ 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.”⁴ 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. 6.⁵

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.⁶ 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.”⁷ Others rely on a discredited study discussed above. That study does not consider the small cell facilities contemplated in this application.

6. ENVIRONMENTAL REVIEW

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

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

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

⁵ 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.*

⁶ 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.

⁷ 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.

EXHIBIT A

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^[1] 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 21st 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.)^[2]

In the United States, over 80% of emergency calls to 911 emergency services originate from mobile phones.^[3] 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.^[4] 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.)^[5]

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.^{[6], [7], [8]} 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^2 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^2 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^2 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^2 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^2 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).

R² 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).

R² 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).

R² 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).

R² 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 - R² 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 ²
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. ^[9] 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 ^[4] 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. ^[10] 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.^[11] 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.^[12] 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.^[12]

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.

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SC 001 CARMELO STONEWALL (OPT 2)
CARMEL STREET CARMEL-BY-THE-SEA CA 93921



VIEW 1



EXISTING



PROPOSED LOOKING NORTH FROM CARMEL STREET

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.



SC 001 CARMELO STONEWALL (OPT 2)
CARMELO STREET CARMEL-BY-THE-SEA CA 93921



VIEW 2



EXISTING



PROPOSED LOOKING SOUTH FROM CARMELO STREET

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.



SC 001 CARMELO STONEWALL (OPT 2)
CARMELO STREET CARMEL-BY-THE-SEA CA 93921



VIEW 3



ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.

Carmelo Street Small Cell Node 001



Carmel-by-the-Sea Planning Commission
February 10, 2026

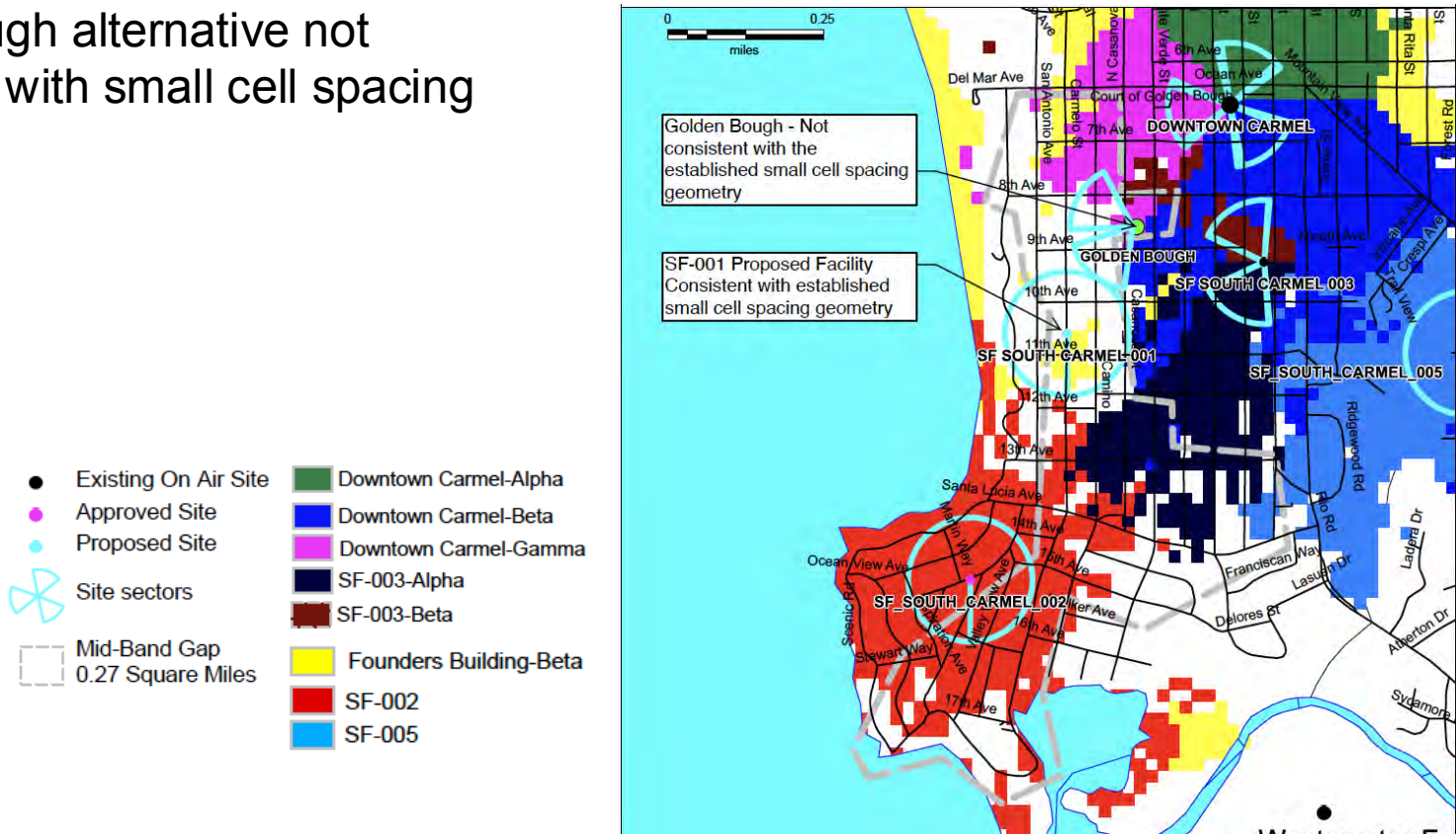
Pete Shubin, Sequoia Deployment Services
Jay Gruendle, Program Manager, Verizon Small Cells
Jeremy Stroup, Verizon Municipal Engagement Partner
Rich Conroy, PierCon Solutions
David Witkowski, Oku Solutions
Paul Albritton, Mackenzie & Albritton LLP



Golden Bough

Golden Bough alternative not consistent with small cell spacing geometry

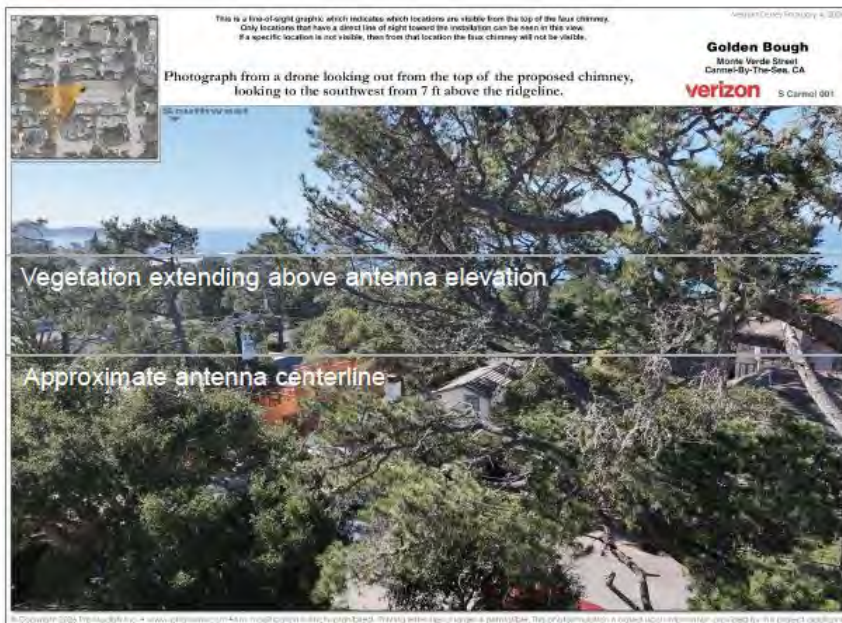
Best Serving Transmitter Existing Network



Golden Bough

Drone photos show obstruction by trees next to Golden Bough, particularly southwest toward much of gap area

Looking Southwest



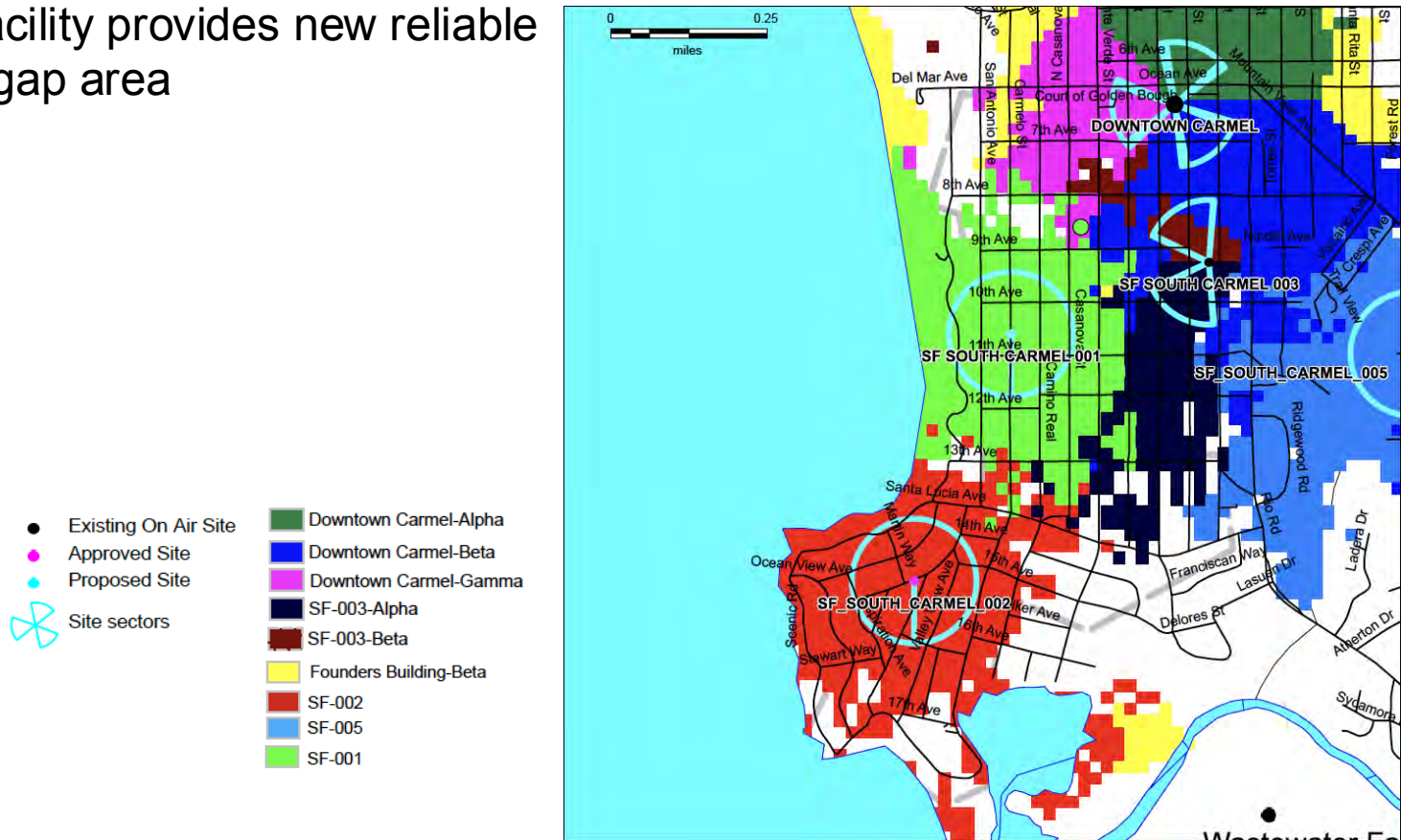
Looking Northwest



Golden Bough

Proposed facility provides new reliable service to gap area

*Best Serving Transmitter
with Proposed Facility*



Small Cell Effects on Property Valuations

Prepared for Carmel-by-the-Sea PC, February 10th 2024

David Witkowski, CEO, Oku Solutions LLC

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Assertions of Valuation Decrease



- Oft-cited “Up to 20% reduction” is based primarily on Bond/Wang in *The Appraisal Journal* (2005).
 - Sandy Bond was retained in the late 90’s by a Christchurch NZ neighbor group opposed to a tower build.
 - Bond’s method was a survey, not a study of MLS or other data.

Other Works re Valuation Decrease



- Other work claiming valuation disamenity:
 - *Affuso et al. 2017*, *Hale/Beck 2019*, others
 - Some (notably not all) articles in NAR Realtor.

Works re Valuation Amenity



- Some studies show property valuation increase or no effect:
 - Smaqae / Anwar (2022), Olukolajo et al. (2013), Valbridge (2018), Maennig (2012), others..

Spatial Difference in Differences



- I authored a study on small cell price effects using an analysis by Ralph McLaughlin, PhD in real estate economics.
- Study used 1,700+ small cell builds and *all* 11.6 million real estate transactions between 2010 – 2020, including Central Coast sites.

Spatial Difference in Differences



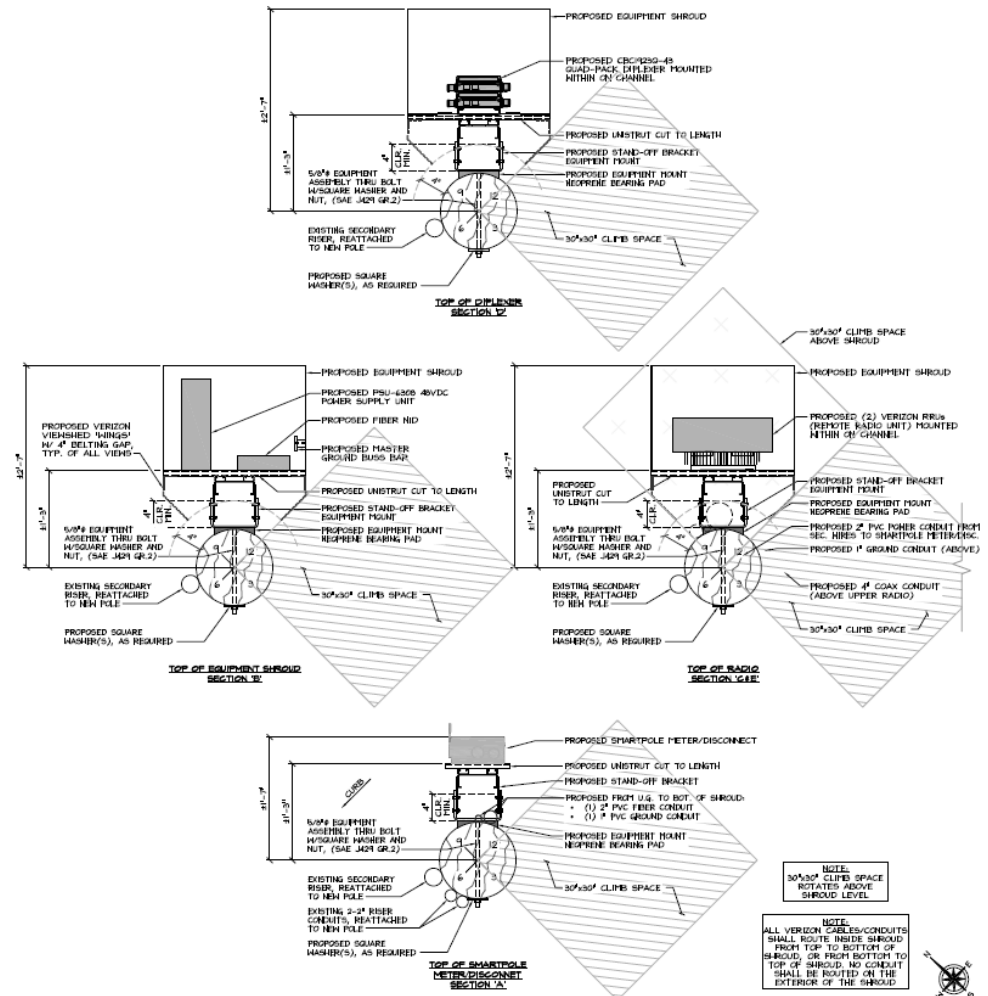
- To my knowledge, mine is the only small cell study. Others are macro-focused.
- The study showed no economically-significant negative impacts, and some economically-significant positive impacts, variable by community.

-
- TOP OF PROPOSED ANTENNA**
147'-0" A.G.L.
- CENTERLINE OF PROPOSED ANTENNA**
149'-7" A.G.L.
- TOP OF PROPOSED UTILITY POLE**
148'-4" A.G.L.
- BOTTOM OF ANTENNA MOUNT BRACKET**
146'-5" A.G.L.
- RELOCATED PRIMARY POWER LINES**
139'-2" A.G.L.
- EXISTING SECONDARY POWER LINE**
131'-4" A.G.L.
- TOP OF EXISTING CONDUIT**
129'-11" A.G.L.
- REPLACEMENT 4"-Ø CROSS-ARM AT COMTS**
- EXISTING COMM. LINE**
125'-7" A.G.L.
- EXISTING COMM. LINE**
125'-4" A.G.L.
- TOP OF PROPOSED EQUIPMENT SHROUD**
119'-0" A.G.L.
- BOTTOM OF PROPOSED EQUIPMENT SHROUD**
110'-0" A.G.L.
- TOP OF PROPOSED METER/DISCONNECT**
10'-0" A.G.L.
- BOTTOM OF PROPOSED METER/DISCONNECT**
17'-0" A.G.L.
- FINISHED GRADE**
10'-0" A.G.L.
- PROPOSED VERTIZON CABLE SHROUD CUT SHROUD 1" ABOVE POLE TOP PER PAGE POLE-TOP INSPECTION REQUIREMENTS (MAINTAIN 1" CLEARANCE TO TOP OF POLE)**
- PROPOSED VERTIZON RF WARNING SIGN FACING CLIPS SPACE AT 3'-0" MIN. BELOW ANTENNA**
- RELOCATED PRIMARY (4) POWER LINES**
- RELOCATED CROSS ARM**
- RELOCATED SECONDARY POWER LINES RE-ATTACHED ONTO ROADWAY SIDE OF NEW 6' CROSSARM**
- RELOCATED SPAN GUY**
- COMTS LEVEL (BROOK USIN-F ARM OR APVD. EQ.)**
- COMM. LINES RELOCATED TO ROADWAY SIDE OF POLE:**
- * ATTN COMMS RELOCATED TO BOTTOM INSIDE
 - * COMCAST COMMS RELOCATED TO TOP OUTSIDE
- PROPOSED CONDUITS (BEYOND):**
- (1) 2" CONDUIT FOR POWER (PG&E RISER TO GRADE)
 - (1) 4" CONDUIT FOR COM (ANT. TO SHROUD SEE NOTE 4)
 - (1) 1" CONDUIT FOR GROUNDING (ANT. TO SHROUD)
 - (1) 2" CONDUIT FOR FIBER (COMTS LEVEL TO SHROUD)
- PROPOSED VERTIZON EQUIPMENT SHROUD:**
- (1) 48PD RADIO (TOP)
 - (1) QUAD-PACK DIPLEXER (BENEATH 444H)
 - (1) 556S RADIO (BENEATH DIPLEXER)
 - (1) PSU 6306 RSV POWER SUPPLY (BOT.-RT.)
 - (1) MAIN GROUND BUSS BAR (BOTTOM LEFT SIDE)
 - (2) BACKSIDE NINE#2 FOR VISIBLER SCREENING
- PROPOSED VERTIZON STANDOFF BRACKET**
- PROPOSED PG&E/VERTIZON METER/DISCONNECT**
- REPLACEMENT 55' CL=1 WOOD UTILITY POLE**
- RELOCATED RISER**
- PROPOSED CONDUITS:**
- (1) 2" PG&E RISER, SEE ABOVE)
 - (1) 1" CONDUIT FOR GROUNDING (TO GND WELL, BYD.)
 - (1) 2" CONDUIT FOR FIBER (U.G.TO SHROUD, BEYOND)
- PROPOSED VERTIZON GROUNDING WELL w/ GROUND ROD, BEYOND**
- 36"-Ø TYPICAL CLEARANCE PER U.O.#6**
- MIN 4" CLR PER G.O.#6**
- 32"-Ø**
- 3'-0" MIN. BELTING GAP**
- 18'-Ø TYPICAL ENTIREMENT**

Opposition Comments on Attachments

What would happen if the attachment heights changed?

- Mismatch of attachment heights compared to other poles on the street
- Other GO 95 infractions such as blocking traffic (driveway)

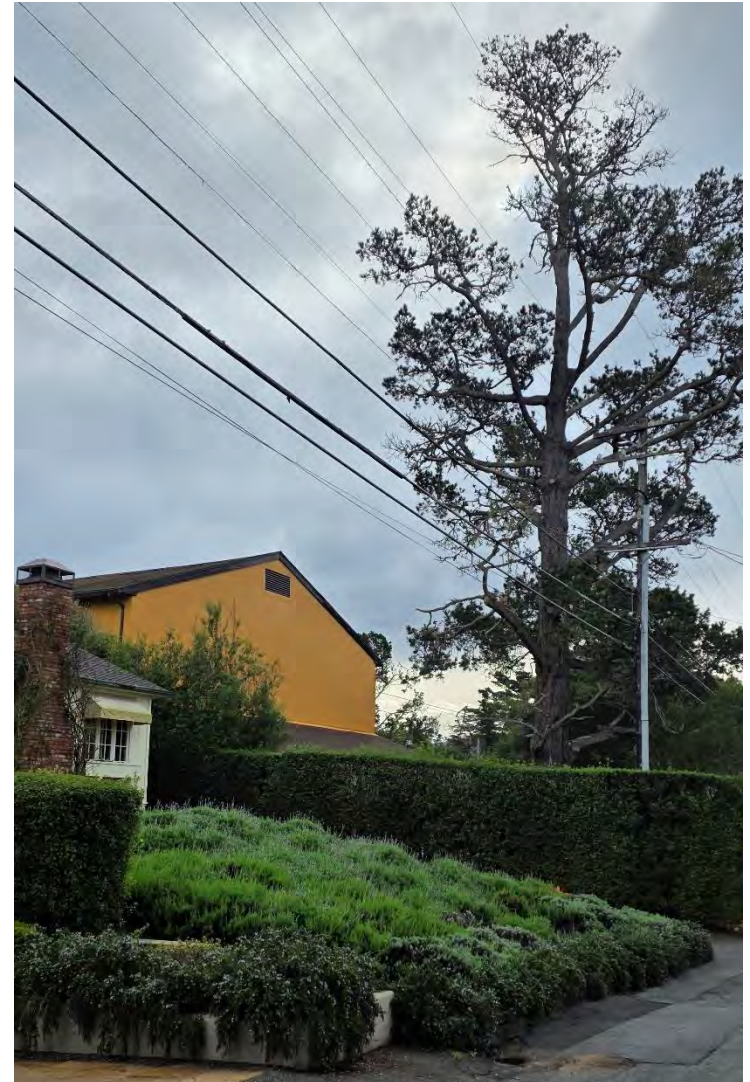


Impacts to the Adjacent Tree

- Met with PG&E job owner for this site, PG&E arborist, and City Staff at the site on February 4
- PG&E explained design, plans, and pole replacement scope
- PG&E confirmed that the pole replacement work will have minimal impact to the health of the tree

Golden Bough – Constructable, BUT DOES NOT WORK

- Met with Golden Bough and worked up the best possible design for the location
- The design is constructable but does not work for Verizon Wireless's network needs (wrong location and trees)
- Golden Bough has since requested potential changes to the design and location that would exacerbate the reasons why the site does not work
- Those requested changes would violate the City's Codes
- The site does not work for Verizon Wireless



Conclusion: Facts

- PierCon and CTC confirm service gap in Carmel-by-the-Sea
- The proposed facility complies with City Code use permit and design review findings and wireless design guidelines

Conclusion: Law

- City cannot require a macro facility over a small cell (*New York SMSA Ltd. Partnership v. Town of Clarkstown*, 612 F.3d 97, 105-106 (2nd Cir. 2010))
- City cannot bar use of the right-of-way by a telecommunications company (Cal. Pub. Util. Code §7901)
- Requiring installation of a macro facility over a small cell materially inhibits network improvements through unreasonable delay and cost (*TowerNorth Development, LLC v. City of Geneva*, 2024 WL 621616, *24-25 (N.D. Ill. Feb. 14, 2024))
- Evidentiary burden on City to prove that any alternative is less intrusive and “*technically feasible*” (*T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987, 998-999 (9th Cir. 2009))



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October 14, 2025

VIA EMAIL

Planning Division
City of Carmel-by-the-Sea
Monte Verde Street
Carmel-by-the-Sea, California 93921

Re: Verizon Wireless Application
Small Wireless Facility, Carmelo Street

To Whom It May Concern:

We write on behalf of Verizon Wireless regarding the accompanying application for a small wireless facility on Carmelo Street north of 11th Avenue (the “Application”). This letter supplements the Application with information regarding two special exception requests, as required by the City’s *Wireless Facility Application Checklist*, Section 15.1.

Verizon Wireless’s proposed facility complies with the Carmel-by-the-Sea Municipal Code (the “Code”) and *Administrative Detailed Wireless Facility Design Guidelines* (the “Guidelines”), except for two Code standards. The proposed location is:

1. Within the right-of-way in the R-1 single-family residential zone (Code § 17.46.040(E)(1)(a)), and
2. In front of area five feet in either direction from centerline of residential door or window (Code § 17.46.040(E)(2)(a)).

Verizon Wireless requests special exceptions to these requirements in accordance with Code Section 17.46.080(C). The City must approve these special exceptions because denial of the Application would constitute an effective prohibition of service in violation of the federal Telecommunications Act. Further, denial would contradict California Public Utilities Code Section 7901, which grants telephone corporations a statewide franchise right to place their equipment along any right-of-way. Verizon Wireless reserves its rights to challenge the requirements to request special exceptions to preempted or excessive standards, and the general preference to place wireless facilities in the right-of-way, regardless of any availability of private property.

Planning Division
 City of Carmel-by-the-Sea
 October 14, 2025
 Page 2 of 7

Separately, we confirm that the proposed equipment shroud is allowed on the utility pole because an underground vault is infeasible, per the equipment location preferences of Design Guidelines Section II(C)(1).

I. The Proposed Facility Satisfies the Findings for Special Exceptions.

The City must grant the four special exceptions based on the three findings of Code Section 17.46.080(C)(2), as follows.

- 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.*

1. Denial Would Violate the Federal Telecommunications Act.

Denial of a facility because it is located in an R-1 zone right-of-way would constitute an effective prohibition of service in violation of the federal Telecommunications Act. 47 U.S.C. § 332(c)(7)(B)(i)(II). The proposed facility will be a “personal wireless service facility” providing “personal wireless services,” which include “commercial mobile services,” defined as “any mobile service...that is provided for profit and makes interconnected service available (A) to the public or (B) to such classes of eligible users as to be effectively available to a substantial portion of the public, as specified by regulation by the Commission.” 47 U.S.C. §§ 332(c)(7)(C), 332(d)(1).

A local government’s denial of a personal wireless facility is an “effective prohibition” if the wireless provider can show two things: (1) that it has a “significant gap” in service; and (2) that a proposed facility is the “least intrusive means,” in relation to the land use values embodied in local regulations, to address the gap. *See T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987 (9th Cir. 2009). If a provider proves both elements, the local government *must* approve the facility, even if there is substantial evidence to deny the permit under local land use provisions (which there is not in this case). This is because the provider has met the requirements for federal preemption, i.e., denial of the permit would “have the effect of prohibiting the provision of personal wireless services.” 47 U.S.C. § 332(c)(7)(B)(1)(ii); *T-Mobile v. Anacortes*, 572 F.3d at 999.

Verizon Wireless engaged independent engineering firm PierCon Solutions to conduct a drive test and evaluate service in the gap area. On February 19, 2025, a PierCon engineer drove a vehicle along local roadways in west Carmel, with an antenna mounted outside the vehicle connected to equipment that measured signal level and other parameters. PierCon compiled the drive test data and prepared a report, submitted

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separately. PierCon confirmed the gap in Verizon Wireless network coverage and capacity in the area. PierCon also confirmed that a new small cell is required to introduce new services, improve existing services and network capacity, and add 5G service.

Verizon Wireless's *Alternatives Analysis* confirms that the proposed facility is the least intrusive, feasible means to fill the significant gap, based on the Code's applicable location preferences and standards.

For wireless carriers to establish a prohibition of service case, federal law does not require that a proposed facility be the "only" alternative, but rather that no feasible alternative is less intrusive based on local regulations. *See Metro PCS, Inc. v. San Francisco*, 400 F.3d at 734-35. To avoid federal preemption, the City would need to raise another alternative that is available, technologically feasible, and less intrusive than the proposed facility according to the Code, then allow Verizon Wireless to review that alternative. *T-Mobile v. Anacortes*, 572 F.3d at 998-999.

In a 2018 order, the FCC determined that the Ninth Circuit's two-part test is too narrow and confirmed that a wireless carrier need not show an insurmountable barrier, or even a significant gap, to prove a prohibition of service. *See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, 33 FCC Rcd. 9088, ¶¶ 35, 38 (September 27, 2018). Instead, "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.'" *Id.*, ¶ 35. State or local regulations are preempted if they materially inhibit "densifying a wireless network, introducing new services, or otherwise improving service capabilities." *Id.*, ¶ 37. The FCC determined that the coverage gap approach is incompatible where new wireless facilities are installed to add network capacity. *Id.*, ¶ 40.

The Ninth Circuit Court of Appeals upheld the "materially inhibit" standard for a prohibition of service and the FCC's application of the standard to wireless facilities including small cells that provide 5G service, such as Verizon Wireless's proposed facility. *See City of Portland v. United States*, 969 F.3d 1020, 1035 (9th Cir. 2020), *cert. denied*, 141 S.Ct. 2855 (Mem) (U.S. June 26, 2021) ("The FCC here made factual findings, on the basis of the record before it, that certain municipal practices are materially inhibiting the deployment of 5G services.") In adopting and applying the FCC's "materially inhibit" standard, another federal appeals court recently confirmed, "not only does 'insufficiency in coverage' ordinarily entitle a provider to a variance but so does insufficiency in network capacity, 5G services, or new technology." *Cellco Partnership v. White Deer Township Zoning Hearing Board*, 74 F.4th 96, 106 (3rd Cir. 2023).

As noted, the PierCon report demonstrates that the proposed facility will improve service in western Carmel, densify the network with another facility, add network

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capacity, and introduce 5G service to the area. Thus, denial of the application would “materially inhibit” Verizon Wireless’s ability to compete in a fair and balanced legal and regulatory environment, effectively prohibiting service in violation of the Telecommunications Act.

2. Denial Would Violate California Public Utilities Code Section 7901.

Denial of the Application would violate California Public Utilities Code Section 7901, which grants telephone corporations a statewide right to place their equipment along any right-of-way. In particular, Section 7901 preempts the Code’s restriction of facilities in the R-1 zone right-of-way.

For over a century, the California Supreme Court has confirmed that Public Utilities Code Section 7901 grants telephone corporations a statewide franchise right to place telephone equipment in the right-of-way without charge. *See Western Union Tel. Co. v. Hopkins*, 160 Cal. 106, 123 (Cal. Sup. Ct. 1911) (statute grants “exclusive occupation of portions of the streets...free of charge”); *Pacific Tel. & Tel. Co. v. City & Cty. of San Francisco*, 51 Cal.2d 766, 771 (Cal. Sup. Ct. 1959) (statute “gives a franchise from the state to use the public highways for the prescribed purposes without the necessity for any grant by a subordinate legislative body”).

The Supreme Court confirmed this statewide franchise right in 2019. *T-Mobile West LLC v. City and County of San Francisco*, 6 Cal.5th 1107, 1122 (Cal. Sup. Ct. 2019) (“Any wireless provider may construct telephone lines on the City’s public roads so long as it obtains a permit, which may sometimes be conditioned on aesthetic approval”). Local aesthetic review cannot preclude placement of right-of-way facilities, because the court confirmed that a city cannot deprive a telephone corporation of its statewide franchise right to place equipment in the right-of-way. *Id.* at 1120.

The FCC’s “materially inhibit” standard described above is based on two Telecommunications Act provisions barring a prohibition of service. Infrastructure Order, ¶¶ 36, 82. One of these, Section 253(c), reserves the authority of state governments to manage the public rights-of-way, which the FCC found “includes any conduct that bears on access to and use of those ROW.” 47 U.S.C. § 253(c); Infrastructure Order, ¶ 94. Through Section 7901, California has long granted telephone corporations a statewide right to use the right-of-way with no local franchise requirement. The City’s management of the right-of-way through the restriction in the R-1 zone is curtailed by state law.

State law is long settled on this matter. Most Carmel rights-of-way are within the R-1 zone. Steering a proposed wireless facility to a distant right-of-way in a different zone or denying a proposed facility based on unreasonable aesthetic criteria would deprive Verizon Wireless of its franchise right granted by Section 7901 to use any right-of-way.

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In sum, to avoid violations of federal and state law, and to allow Verizon Wireless to compete in a fair and balanced legal and regulatory environment, the City must grant the exception requests.

- 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.*

Granting the two special exceptions to the relevant location standards will not compromise public or fire safety standards. 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. They are also subject to PG&E safety rules. *See, e.g., PG&E Installation Details for Service to Pole-Mounted Communication Equipment*, Document 027911 Rev #15, June 30, 2023. PG&E will inspect the proposed facility to ensure compliance with applicable safety regulations.

Neither of the two standards requiring an exception bear any relation to fire, health, or safety standards. Small cells are commonly placed in rights-of-way throughout California within residential zones and window viewsheds.

- c. 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.*

We address this finding with respect to each of the two exception requests, as follows.

1. Within the R-1 single-family residential zone (Code § 17.46.040(E)(1)(a))

Any facility in an R-1 zone right-of-way automatically requires a special exception per Code Section 17.46.040(E)(1). Verizon Wireless is complying by requesting the special exception, which the City requires to ensure that it avoids a violation of the federal Telecommunications Act and California Public Utilities Code Section 7901. As explained above, failure to grant an exception would constitute a prohibition of service under the Telecommunications Act, because the proposed facility is the least intrusive feasible alternative to provide coverage to a significant gap in Verizon Wireless service, and denial would materially inhibit Verizon Wireless's ability to provide service. Further, denial would deprive Verizon Wireless of its state-mandated right to install its equipment in any public right-of-way for the provision of telephone services according to California Public Utilities Code 7901.

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2. In front of area five feet in either direction from centerline of residential door or window (Code § 17.46.040(E)(2)(a))

The proposed replacement utility pole is in the public right-of-way, with the center of the pole located 23 feet, 7 inches from the closest window. Using an existing utility pole location avoids the need for a new pole, which is the least compatible structure option according to the Code. Code § 17.46.040(D)(2). The small, two-foot cylindrical antenna will be mounted above the pole, with a total height of 48 feet 10 inches, well above any residential sight lines. The existing tree adjacent to the utility pole will screen the proposed facility equipment shroud, as shown in Verizon Wireless's photosimulations. Accordingly, the Proposed Facility location and design satisfy the objectives of Code Chapter 17.46, notably by minimizing adverse aesthetic impacts and preserving residential character. Code § 17.46.010(B)(4).

Verizon Wireless's Alternatives Analysis evaluates 28 utility poles in the right-of-way and concludes that the proposed facility is the least intrusive, feasible option. Numerous other poles are infeasible. For example, PG&E rules do not allow an antenna on the utility pole north of the proposed facility because it supports a transformer. The pole to the south is clustered with a second pole, both supporting risers, and one pole supports a large pole-mounted cabinet, leaving insufficient safe climbing space for utility workers.

Of the 12 feasible alternative poles in the search area, six are also within the area five feet in either direction of the centerline of a residential door or window. The other six require more exceptions than the Proposed Facility, so are more intrusive overall.

II. The Proposed Facility Complies with the Equipment Placement Preferences.

For right-of-way facilities, the *Administrative Detailed Wireless Facility Design Guidelines* express a preference first for equipment in an underground vault, then equipment in a pole-mounted shroud less than six cubic feet, then a shroud more than six cubic feet. Design Guidelines § II(C)(1). In its vaulting analysis accompanying the application, Verizon Wireless explains that an underground vault is infeasible at the proposed location for several reasons. For example, the large excavation area required to install a vault would result in the loss of on-street parking. It would also interfere with the existing trees, tree roots, and underground utilities in the area.

Because vaulting is infeasible, Verizon Wireless may install a pole-mounted equipment shroud per Design Guidelines Section II(C)(1). The second equipment placement preference is a shroud less than 6 cubic feet, but that is infeasible to contain the volume of network equipment requirement required for the proposed facility to fill a significant gap in service: two radios, a fiber demarcation box, two power supply units, and a cable diplexer. A shroud must also provide clearance around each piece of equipment for cables, connections, worker access, and air circulation. Verizon must

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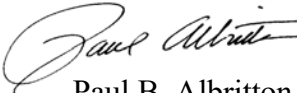
install a shroud more than 6 cubic feet, which is allowed as the third equipment placement preference.

To safely accommodate all of the equipment as required by the California Public Utilities Commission and PG&E, Verizon Wireless selected a 14.5-cubic foot equipment shroud available from a manufacturer, typically used for small cells mounted to utility poles. Plans Sheet A-5 includes a detailed elevation depicting the equipment layout and clearances within this 14.5-cubic foot shroud, illustrating how a shroud of only six cubic feet—less than half the required volume—is infeasible.

Because an underground vault and a shroud less than 6 cubic feet are infeasible, the City must approve the 14.5-cubic foot pole-mounted shroud per the equipment placement preferences. No special exception is required.

In the alternative, the City could approve the shroud because it “is more consistent with existing poles and the surrounding environment.” Design Guidelines § II(C)(1). Carmel streets are lined with utility poles supporting fixtures such as electric transformers and utility lines, and the proposed facility will place new utility equipment on this existing utility infrastructure. In fact, the utility pole due south of the proposed facility, at the corner of Carmelo Street and 11th Avenue, supports a large pole-mounted utility cabinet, as shown in the Alternatives Analysis (Alternative 10). Accordingly, the proposed facility would be consistent with existing development in the area.

Verizon Wireless looks forward to working with the City to secure approval of the Application.

Very truly yours,

Paul B. Albritton



Independent Radio Frequency Report
Regarding a Proposed
Verizon – Small Cell
Wireless Facility

Site ID: “Carmel Node 001”

Carmelo Street

Carmel-by-the-Sea, CA 93921

Monterey County

Prepared for
Verizon Wireless

By

PierCon Solutions, LLC
October 14, 2025

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EXECUTIVE SUMMARY

Purpose and Scope

PierCon Solutions, LLC performed an independent radio-frequency engineering analysis on Verizon Wireless's proposal to install a small-cell telecommunications facility on Carmelo Street between 10th and 11th Avenues in Carmel-by-the-Sea. The project's objective is to improve overall 4G LTE service, densify the network, and introduce new 5G C-band (3700 MHz) service, to remedy a significant service gap within a densely populated residential area.

Engineering Approach

PierCon conducted an independent drive test on February 19, 2025 using a calibrated PCTEL IBFLEX scanner (600 MHz–6 GHz) and analyzed Verizon's Key Performance Indicator (KPI) data from November 2024 through February 2025. Supporting data included topographical reviews, FCC-licensed spectrum analysis, and EDX Signal Pro simulations.

Key Findings

- Low Band (700/850 MHz): 73% of the test area showed SINR <10 dB, 43% ≤ 5 dB, and 10% <0 dB—indicating poor signal quality despite acceptable RSRP. The significant gap covers approximately 0.43 sq mi (~1,059 residents).
- Mid Band (1900/2100 MHz): Reliable in-building RSRP not met across approximately 0.27 sq mi (~776 residents). 73% of the area <10 dB SINR, and 9% ≤ 0 dB—total gap approximately 0.39 sq mi (~994 residents).
- 5G C-Band (3700 MHz): Nearly no in-building 5G coverage; gap approximately 0.47 sq mi (~1,224 residents). Even post-activation of nearby nodes, geometry would still require a new facility.

Performance Metrics (KPIs):

- Founders Building Beta Sector:
 - 700 MHz drop-call >1% for 93% of busy hours (peaks >20%)
 - 850 MHz VoLTE drop call >1% for 58% of time
 - 1900 MHz VoLTE drop call >1% for 56% of time
 - Throughput <5 Mbps 88% (700), 10% (850), 39% (1900)
- SF South Carmel 003 Alpha Sector: 700 MHz drop-call >1% for 47% of busy hours (peaks >18%).

These results confirm service below Verizon's 5 Mbps target and the FCC's 2024 mobile-broadband benchmark of 35 Mbps per user for 5G services and 7 Mbps for 4G services.

Proposed Solution

Verizon proposes a 50-ft small cell (antenna CL ≈48.7 ft) to be installed on an existing utility pole. The new site would provide reliable in-building mid-band coverage to approximately 0.10 sq mi (~372 residents)—addressing 37% of the

identified gap. Combined with the approved SF South Carmel 002 site (0.07 sq mi / 201 residents), the two facilities will cover 62% of the mid-band gap and serve 74% of its population.

Alternatives & Least-Intrusive Analysis

Golden Bough Playhouse Alternative: Provides significant redundant overlap and covers 6–11% less area than the proposed site. RF modeling shows increased interference and poorer performance.

Siting Constraints: Among 40 utility poles evaluated, only 6 met RF, code, and topographic requirements. The chosen pole #1 (between 10th and 11th Avenues) is nearest the geometric center of the gap and offers the least visual impact.

Conclusion

Empirical drive-test data and KPI analysis demonstrate a significant service deficiency in Verizon’s network throughout the Carmelo Street corridor. The proposed small cell is technically essential, least intrusive, and well-positioned to deliver reliable in-building LTE and 5G coverage while maintaining Carmel’s aesthetic and zoning standards. Once implemented, the facility will substantially improve signal quality, reduce VoLTE drop calls, enable carrier aggregation, and restore network competitiveness.

1 PURPOSE AND SCOPE

PierCon Solutions LLC, an engineering firm specializing in wireless communications, performed an independent analysis regarding the radiofrequency engineering aspects of the proposal by Verizon Wireless to construct and operate a small cell wireless telecommunications facility consisting of one antenna at Carmelo Street, between 10th and 11th Avenue, Carmel-by-the-Sea, CA. The purpose of this site is to improve overall service on Verizon’s network, introduce new 5G services through deployment of Verizon’s licensed 3700 MHz band, densify the existing network, and to remedy a significant gap in service.

In preparation for conducting this analysis, PierCon Solutions obtained applicable engineering data from Verizon Wireless, and conducted an independent drive test of the surrounding areas.

The following report results from a thorough independent study and analysis (from a radiofrequency engineering perspective) of the applicant’s proposal and provides justification for the site in consideration of Carmel-by-the-Sea’s planning commission’s goals and restrictions.

2 GENERAL OVERVIEW

Verizon Wireless is a commercial wireless communications service provider licensed by the Federal Communications Commission (FCC) to provide wireless service in various frequency bands throughout the Carmel-by-the-Sea area and Monterey County, CA. The frequency bands to which Verizon Wireless is licensed are the 700, 850, 1900, 2100, and 3700 MHz frequency bands.

The wireless telecommunications small cell¹ facility proposed in this application is to provide reliable service for voice and data in the form of 4G² LTE and 5G³ technology, deploying the mid band frequencies available, where bandwidth is the most abundant.

Table 1 below provides the Verizon Wireless licensed frequencies and bandwidths in Monterey County:

Table 1	
Frequency Band	Bandwidth
700 MHz	10 MHz
850 MHz	10 MHz
1900 MHz	5 MHz
2100 MHz	25 MHz
3700-3900 MHz	140 MHz

As can be seen from Table 1, Verizon is licensed for total of 20 MHz of “Low-Band” bandwidth in the 700 MHz and 850 MHz frequency bands. These frequency bands are commonly referred to as low band frequencies and will be referred to as such in this report. Additionally, Verizon is licensed for a total of 170 MHz of “Mid-Band” bandwidth in the 1900 MHz, 2100 MHz and 3700 MHz bands. These frequency bands are commonly referred to as mid band frequencies and will be referred to as such in this report.

Each frequency band has different performance characteristics for both coverage and capacity. From a coverage perspective, the lower frequency bands (700 & 850 MHz) cover a greater distance and are less attenuated by trees and terrain, while the higher frequency bands (1900, 2100, 3700 MHz) cover a lesser distance and are more attenuated by trees and terrain. From a capacity perspective, each frequency band offers a finite amount of spectrum bandwidth. It is through this bandwidth that capacity and throughput is supported. A well designed wireless network is required to provide both reliable coverage levels and sufficient bandwidth, maximizing the spectrum and bandwidths that have been procured for use from the FCC. The purpose of the proposed site is to improve overall service on Verizon’s

¹ The FCC defines a small wireless facility as (i) mounted on a structure less than 50 feet in height, (ii) each antenna is no more than three cubic feet in volume; and (iii) all other equipment on the structure must be less than 28 cubic feet in volume. The City of Carmel-by-the-Sea’s Administrative Detailed Wireless Facility Design Guidelines restrict the volume of accessory (non-antenna) equipment for right-of-way facilities to 17 cubic feet, which limits the number of radios that can be installed for the Proposed Facility.

² 4G technology known as Long Term Evolution (LTE) is a wireless communications standard developed by the 3rd Generation Partnership Project (3GPP) that is designed to provide up to 30x the speeds of 3G networks for mobile devices such as smartphones, tablets, netbooks, notebooks and wireless hotspots. The LTE specification provides theoretical downlink peak rates of 300 Mbps, uplink peak rates of 75 Mbit/s and QoS provisions permitting a transfer latency of less than 5 ms in the radio access network. Current industry standard is to provide a minimum downlink user throughput of 5 Mbps. LTE is the current wireless technology allowing for high speed data, support of data demanding applications, implementation of the internet of things (IoT) and the foundation for 5G networks.

³ The Fifth Generation of Mobile Telephony, or 5G, or 5GS, is the system defined by 3GPP from Release 15, functionally frozen in June 2018 and fully specified by September 2019. 5G improves on the 4G services over several areas such as: (1) Enhanced Mobile Broadband (eMBB) offering higher data rates up to 500 Mbps downlink outdoor and 1 Gbps for indoor (5GLAN); (2) Critical Communications (CC) and Ultra Reliable and Low Latency Communications (URLLC) includes remote control of process automation, 99.9999% reliability, user experience data rate of 100 Mbps and end-to-end latency of 50 ms. (3) Massive Internet of Things (mIoT) through supporting very high traffic densities of devices. (4) Flexible Network Operations such as network slicing, network capability exposure, scalability, diverse mobility, security, efficient content delivery and migration and interworking.

network, introduce new 5G services through deployment of Verizon's licensed 3700 MHz band, densify the existing network, and to remedy a significant gap in service.

Long-Term Evolution (LTE), also known as 4G, is the current technology standard. Migration to 5G, which is the next generation network, is currently in progress. When engaging in a voice call, the user device will connect to the public switched telephone network (PSTN) through a gateway in order to complete a call to a non-LTE or non-5G device. For example, a person making an emergency E911⁴ call from a mobile device to a public safety operator on a landline, such emergency calls will be routed through the PSTN.

3 SERVICE & PERFORMANCE GOALS

Service and performance goals are necessary to provide reliable wireless services across all of Verizon's FCC licensed frequency bands and technologies. Service and performance goals include providing adequate coverage and capacity for voice and data services, preparing to provide future services, and otherwise improving service capabilities.

Service goals are designed to provide all customers with a positive wireless voice and data experience. Simply put, a positive wireless experience includes the customer connecting to the network on the first try, staying connected throughout the session, and the customer ending the session when ready. For positive experiences with data connections (e.g., internet browsing) the speed is as fast as the technology allows. Unreliable service, meaning service levels that do not meet service and performance goals, causes a negative experience: customers cannot place calls when they want to; when they are connected, voice call quality does not meet customer expectations; or the call simply drops off (disconnects) without notice.

Unreliable service that fails to meet service and performance goals, which include voice and/or data services, can occur if there is: (i) a lack of reliable signal, including poor signal quality; and/or (ii) a lack of a dominant serving transmitter; and/or (iii) a lack of system capacity, or in terms of LTE, insufficient throughput, for any of Verizon's services and across all of Verizon's licensed frequency bands. Providing quality in-building voice and data services, with sufficient system capacity and high-speed data rates, is critical to Verizon's customers and is essential to Verizon's ability to compete effectively with its competitors in a fair and balanced legal and regulatory environment.

Verizon's service and performance goals for this area are to provide reliable in-building residential wireless service and provide new 5G services. The information provided in this report demonstrates that the existing wireless sites do not provide adequate signal strength or adequate signal quality to the area, causing a significant gap in coverage. The report will also show that 5G services are not currently deployed in the area and users will benefit from the addition.

Verizon's specific design and performance requirements are to:

- Provide reliable residential in-building coverage to residential homes to the Carmelo Street area of Carmel-by-the-Sea between 6th Avenue and Santa Lucia Avenue, and between San Antonio Avenue and San Carlos Street. Reliable residential in-building coverage is defined as a reference signal receive power (RSRP) greater than or equal to -95 dBm⁵.

⁴ E911, or Enhanced 911, is a system that automatically identifies the location of a 911 caller and transmits that information to the emergency dispatch center. This system is designed to improve the efficiency and effectiveness of emergency responses by providing dispatchers with accurate location information.

⁵ Verizon Wireless' minimum design signal levels used for reliable in-building residential coverage is consistent with the 3rd Generation Partnership Project (3GPP) published values. Attached as Appendix 2 is a link budget demonstrating the necessary criteria and the cited standard references.

- Provide for service that meets or exceeds various metrics with regards to key performance indicators, related to VoLTE drop call rates, downlink throughput, and utilization rates to name a few.

Verizon has chosen to meet the service and performance goals above by proposing a small cell in west Carmel-by-the-Sea. Verizon's current wireless network in the immediate area consists of one macro site and one outdoor small cell, with two other small cells approved but not yet constructed. With the anticipated coverage and capacity to be provided by the two approved small cells, the overall service gap area expected to be remaining is a smaller portion of the original overall gap area. Verizon's intent is to address the remaining service gap area, maximizing available spectrum, and minimize the need for large macro wireless facilities.

Macro sites are intended to enhance the wireless network by the use of multiple antennas-(typically 9 to 12) placed at significant heights to achieve broad area coverage. The installation of a macro site requires: sufficient structure space for the antenna array, sufficient building or ground space for the transmitter equipment cabinets, battery backup, emergency generator, and requires commercial grade electrical service and sufficient backhaul infrastructure-often in the means of new fiber installation or microwave antennas. Macro site deployments must meet local and state code requirements, often requiring variances for height, setback, and other specific items to achieve the desired RF coverage. These sites are often seen as the most intrusive means to meet RF performance and coverage objectives, as the antenna array and equipment do not easily blend into the natural aesthetics of a single family residential area. These requirements have traditionally limited the locations for efficient RF designed networks, requiring augmentation in the form of alternate approaches to address coverage and capacity needs. Additionally, as demand for data escalated, the limitations of traditional macro deployments became clear, and the need for network densification emerged.

The coverage and capacity to be provided from the proposed small cell site is expected to meet the design and performance objectives in the least intrusive means, and be part of an overall integrated network solution, working together with the other approved small cells in the area. The proposed small cell is intended to improve existing services, densify the existing network, and offer new services in the form of 5G.

4 RADIO FREQUENCY ENGINEERING ACTIVITIES PERFORMED

The following items were performed, reviewed, and considered in preparation of this report:

- Performed an independent drive test of the subject and surrounding area
- Reviewed Radio Frequency coverage maps with respect to the RF design and objective within and surrounding Carmel
- Obtained Verizon Key Performance Indicator (KPI) information for the existing sites
- Reviewed USGS Topographical Maps of Carmel-by-the Sea and surrounding areas
- Performed Google Earth aerial and street view analysis
- Reviewed the location and design of adjacent existing wireless communications facilities
- Reviewed proposed and possible alternate site locations
- Created maps, tables and charts illustrating pertinent site performance information

5 VERIZON'S EXISTING NETWORK IN THE AREA SURROUNDING THE SUBJECT SITE

Attached as Exhibit A is a Verizon Site Table. The site table includes the Site Name, Frequency Bands / Technology, Antenna Height (ft.), Sector Azimuths, and Latitude, Longitude. This Site Table can be referenced to any of the plots and exhibits contained herein.

Attached as Exhibit B is Verizon's Site Distance Map. Exhibit B depicts the locations of the surrounding sites and the proposed site as well as the distance away from the proposed site. Verizon has four macro sites currently operating in the area, identified as Downtown Carmel, Pebble Beach Tennis Club, Founders Building, and Chomp Macro. Macro sites are intended to provide coverage to an area, using multiple transmitters and antennas, or sectors. Macro sites typically deploy three to four sectors to allow equal distribution of coverage and capacity. In the area of the proposed site, the closest existing macro site, Downtown Carmel at a distance of 0.45 miles, does not provide adequate coverage to the dense residential area, due to its limited building height of 33 feet above ground. Verizon has decided to address the coverage deficiencies in the area by implementing small cells. Small cells are limited in height, coverage, and spectrum resources, and therefore more small cells are required to address a service gap when compared to a macro site.

The proposed site is located on Carmelo Street which is in the middle of a densely populated residential community and located approximately equally between the SF South Carmel 003 small cell (0.33 mi), Downtown Carmel (0.45 mi.), and the approved SF South Carmel 002 small site (0.38 mi). The neighborhood predominantly consists of medium to large single-family homes, with dense vegetation and mature trees throughout. Ground elevation ranges from 79 feet at the proposed site location to 39 feet along scenic road to the west, and 180 feet on San Carlos Street to the east. Ground elevation also changes from the proposed site at 79 feet heading north on Carmelo Street, reaching 102 feet between 10th Avenue and 9th Avenue, dropping to 85 feet at 9th Avenue, then rising to an elevation of 125 feet between 8th Avenue and 7th Avenue. Elevation along Carmelo Street steadily declines heading south to 68 feet at Santa Lucia Avenue.

6 INDEPENDENT DRIVE TEST ANALYSIS

In this report, we utilized actual drive test maps to scientifically and reliably demonstrate that there is a significant Service Gap in accordance with industry methodology and standards.

Drive tests are a means to evaluate existing coverage. Drive tests are used to produce maps ("Drive Test Maps"), which demonstrate actual signal levels along roadways that are traveled by specially equipped scan test vehicles. In a drive test, the signals from the surrounding on-air sites are collected by a receive antenna mounted to the roof of the drive test vehicle. The data collected by the receive antenna is then processed by computer equipment within the drive test vehicle. The coordinates and signal strength of each collection point are recorded by the computer equipment and ultimately depicted on a Drive Test Map. Literally thousands of data points are collected during a drive test over the roadways driven by the drive test vehicle to ensure that a complete and statistically relevant number of data points can be evaluated⁶.

PierCon Solutions performed an independent drive test⁷ of the wireless carrier networks in and around Carmel on February 19th, 2025. This test was conducted using a calibrated PCTEL IBFLEX scanning receiver, capable of scanning

⁶ Multiple values are collected for any lat long location by the drive test software. PierCon uses the best value measured for any given location in this analysis, i.e., the strongest RSRP values and the largest SINR values.

⁷ The Verizon Wireless drive test results are provided in table format in Appendix 3 per 15.2.1.a. of the Wireless Application Checklist. Drive test data is provided for 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, and 3700 MHz, which includes signal strength in RSSI and RSRP, among other data collected. The PCTEL IBFLEX receiver recorded RSSI only for the 3700 MHz band, and the RSRP values shown in Exhibit E are calculated.

frequencies from 600 MHz to 6 GHz. Equipment was connected to a laptop computer, including a GPS antenna and multi-band receive antenna mounted on the rooftop of the vehicle. The vehicle was driven along the drive route in the vicinity of the subject site and surrounding areas which is represented by the drive test plots. The drive test factors signals from all Verizon's facilities currently on air.

LTE (4G) networks utilize reference signal power (RSRP) to define coverage. Verizon's coverage design threshold- consistent with 3GPP published values- has determined that a design threshold RSRP of equal to or greater than -95 dBm is necessary for reliable residential in-building LTE service, and a RSRP of less than -95 dBm but greater than or equal to -105 dBm is necessary for reliable in-vehicle LTE service. Although in-vehicle levels are shown, in the modern wireless service market, reliable residential in-building service is necessary.

Low Band Drive Test Analysis

Attached as Exhibit C is a: Verizon Wireless 700 MHz LTE (4G) Drive Test Map that demonstrates the results of a drive test performed for the purpose of evaluating existing 4G (LTE) coverage in the vicinity of the Proposed Site. The map represents 4G (LTE) reference signal strength in the 700 MHz band. The map identifies measured RSRP levels as in the table below. Verizon's goal is to provide reliable LTE in-building residential service to the Service Gap area.

Color	RSRP (dB)	Signal Strength Level
Blue	-95 <= X	Minimum threshold in-building residential
Green	-105 <= X < -95	In-vehicle minimum threshold
Yellow	-110 <= X < -105	
Grey	-115 <= X < -110	
Black	150 <= X < -115	

Also attached is Exhibit C1, which is a modified version of Exhibit C, providing the necessary drive test map requested in the City's wireless application checklist⁸. Exhibit C1 provides a signal strength map illustrating RSRP levels greater than or equal to -95 dBm as blue circles, RSRP values less than -95 dBm and greater than or equal to -98 dBm as green circles, RSRP values less than -98 dBm and greater than or equal to -101 dBm as yellow circles, RSRP levels less than -101 dBm and greater than or equal to -104 dBm as grey circles and RSRP values less than -104 dBm as black circles.

As noted in Table 1 above Verizon has over eight times more spectrum bandwidth at the mid-band frequencies compared to the low-band frequencies. This means most services and users will be operating on the mid-band frequencies. As demonstrated by Exhibit C, the RSRP levels in the 700 MHz frequency band are within the design objective for in-building residential service. While RSRP is an important factor, it is not the only factor that determines if there is service. Even with adequate RSRP, if there are high levels of interference from neighboring cells, the overall signal quality can be negatively affected. Interference can result in slower data rates, dropped calls, and reduced overall

⁸ Carmel-by-the-Sea's planning commission adopted standard submission requirements for applicants claiming a significant gap in service. The requirement as outlined in the Wireless Application Checklist section 15.2.1 includes providing drive test data for relevant frequencies in a table format, and also graphically. The graphical drive test data is to be provided showing the minimum signal strength required, and three additional levels, binned in 3 dB levels. The PierCon independent drive test data presented in this report provides on a single map the signal strengths greater than or equal to -95 dBm RSRP (Verizon minimum in-building residential signal strength), RSRP values less than -95 dBm and greater than or equal to -98 dBm, RSRP values less than -98 dBm and greater than or equal to -101 dBm, RSRP levels less than -101 dBm and greater than or equal to -104 dBm, and RSRP values less than -104 dBm.

performance. This will also vary throughout the day as usage increases, as will the overall noise level. Since the propagation characteristics at 700 MHz cover a greater distance than the mid-band frequency bands, there is a high likelihood that interference with neighboring 700 MHz cells can be causing performance problems in the Service Gap area due to a lack of a dominant serving cell. The user experience when signal quality is an issue resembles a user exclaiming that they have 4 bars on their device, yet they cannot connect to service.

To demonstrate if there are signal quality issues affecting performance on the 700 MHz low-band frequency, receive quality plots have been prepared from the drive test data. In LTE signal quality is measured through Signal-to-Interference-plus-Noise Ratio or (SINR). SINR is the ratio of the power of the desired signal (RSRP) to the sum of interference power from other cells and noise. SINR measures the quality of the received signal by comparing the desired signal strength to the combined strength of interference and noise, with higher values indicating a better, clearer connection. A higher SINR means the user device can more easily and accurately decode the data it receives. A strong desired signal (high SINR) leads to faster speeds, fewer dropped calls, and a better overall user experience. Conversely, a low SINR indicates a weak signal, high interference, lower user throughput, and leads to higher amounts of dropped calls.

A good analogy for SINR is explained as a crowded party with competing speakers as follows:

You're at a party with multiple DJs set up in different corners of the room (these are the cell towers or sectors). Each is playing music on their own speaker, and you're standing in a spot where all the sounds reach you clearly — that's strong RSRP.

But here's the catch...

- All the DJs are playing different songs, and their speakers are overlapping where you're standing.
- Now even though the volume is high (strong signal power), you can't enjoy any one song clearly because the different music tracks are interfering with each other.

That messy overlap? That's inter-cell interference — it's not just random noise, it's structured sound from other sources that competes with the one you actually want to hear.

Translation:

- **RSRP (Strong Signal)** = You hear all the DJs loudly.
- **Interference** = Other DJs playing at the same time mess up the one you're trying to follow.
- **SINR (Signal-to-Interference-plus-Noise Ratio)** = Even with a strong signal, your ability to make sense of it is ruined by the competition and background noise.

Attached hereto as Exhibit C2 is a Verizon Wireless 700 MHz LTE (4G) Drive Test Map that demonstrates the results of the drive test PierCon performed for the purpose of confirming Verizon Wireless's existing 4G (LTE) signal quality in the vicinity of the Site within Carmel and surrounding areas. The map represents 4G (LTE) SINR in the 700 MHz band. The data is represented in ranges of SINR per the table below. Verizon's performance level is 12.5 for SINR, which is in the lower range of good. Statistics in the SINR maps are provided using the 10 dB level.

Color	SINR (dB)	Signal Quality	Typical Impact
Blue	> 20 dB	Very Good	High data rates, efficient use of spectrum
Green	10-20 dB	Good	Stable, decent throughput
Yellow	5 -10 dB	Fair	Limited speeds, frequent retransmissions
Grey	0-5 dB	Poor	Low throughput

Black	< 0 dB	Very Poor	Drop connections or no service
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As can be seen in Exhibit C2, the low-band SINR map shows large areas with SINR values less than the minimum design level required. At low-band, 73% of the drive test area has a SINR value less than 10 dB, with 10% of the area showing SINR values less than or equal to zero. Of particular note is that although the low-band frequency demonstrates adequate signal levels (RSRP), the signal quality (SINR) is extremely poor due to the interference levels from distant sites. Exhibit C2 illustrates that an overwhelming percentage of the area driven does not meet the Verizon performance criteria.

Exhibit C2 also demonstrates that although the 700 MHz RSRP was within the design threshold, the signal quality as reported by SINR is mostly poor to no connection, within the area surrounding the proposed site. The significant gap in service at the low-band frequencies is therefore defined by the areas bounded by the grey and black test SINR data plotted on Exhibit C2 identified by a orange hashed polygon. Specifically, the significant gap area is 0.43 square miles including 1.1 miles from Ocean Avenue to Scenic Road, south of 17th Avenue, 0.38 miles from Scenic Road to San Carlos Street near 8th Avenue, and 0.47 miles from Scenic Road to Mission Street near 13th Avenue and Saint Lucia Avenue. According to the 2020 US Census data there are approximately 1059 residents living in the Service Gap area.

Mid Band Drive Test Analysis

Attached as Exhibit D is a Verizon Wireless 2100⁹ MHz LTE (4G) Drive Test Map that demonstrates the results of a drive test performed for the purpose of evaluating existing 4G (LTE) coverage in the vicinity of the Proposed Site. The map represents 4G (LTE) reference signal strength in the 2100 MHz band. The map identifies measured RSRP levels as in the table below. Verizon's goal is to provide reliable LTE in-building residential service to the Service Gap area.

Color	RSRP (dB)	Signal Strength Level
Blue	-95 <= X	Minimum threshold in-building residential
Green	-105 <= X < -95	In-vehicle minimum threshold
Yellow	-110 <= X < -105	
Grey	-115 <= X < -110	
Black	150 <= X < -115	

Exhibit D identifies the service gap with an orange hashed line on the map, and demonstrates that the signal levels measured do not meet Verizon's standard for the provision of in-building residential coverage within the Service Gap boundary.

Also attached is Exhibit D1, which is a modified¹⁰ version of Exhibit D, and also identifies the service gap area with a orange hashed polygon.

⁹ The 2100 MHz band is utilized to represent the mid-band frequencies inclusive of 1900 MHz and 2100 MHz as their propagation characteristics are very similar.

¹⁰ Carmel-by-the-Sea's planning commission adopted standard submission requirements for applicants claiming a significant gap in service. The requirement as outlined in the Wireless Application Checklist section 15.2.1 includes providing drive test data for relevant frequencies in a table format, and also graphically. The graphical drive test data is to be provided showing the minimum signal strength required, and three additional levels, binned in 3 dB levels. The PierCon independent drive test data presented in this report provides on a single map the signal strengths greater than or equal to -95 dBm RSRP (Verizon minimum in-building residential signal strength), RSRP values less than -95 dBm and greater than or equal to -98 dBm, RSRP values less than -98 dBm and greater than or equal to -101 dBm, RSRP levels less than -101 dBm and greater than or equal to -104 dBm, and RSRP values less than -104 dBm.

The Service Gap, represented by a orange hashed polygon on Exhibits D and D1, is approximately 0.27 square miles and is primarily based on the residential homes north and south of the Proposed Site. According to the 2020 US Census data there are approximately 776 residents living in the Service Gap area.

The lack of mid-band (1900 & 2100 MHz) RSRP is due to the propagation characteristics of the frequency range combined with the existing site heights and the distance away from the Service Gap Area. The Downtown Carmel site is a building where existing antennas are at a height of 33 feet above ground, providing approximately 900 feet of reliable in building coverage to the area. The SF South Carmel 003 site is an existing building where the existing antennas are at a height of 57 feet above ground, providing approximately four blocks (0.33 miles or 1716 feet) of reliable in building residential coverage to the area in each direction. We have examined the signal strength levels and now let's examine the signal quality levels through additional SINR maps, as was provided for low band.

Attached as Exhibit D2 is a Signal to Noise and Interference Ratio (SINR) map for mid-band as per the table below:

Color	SINR (dB)	Signal Quality	Typical Impact
Blue	> 20 dB	Very Good	High data rates, efficient use of spectrum
Green	10-20 dB	Good	Stable, decent throughput
Yellow	5 -10 dB	Fair	Limited speeds, frequent retransmissions
Grey	0-5 dB	Poor	Low throughput
Black	< 0 dB	Very Poor	Drop connections or not work

Similar to the signal strength RSRP map (Exhibit D) with a orange hashed polygon indicating insufficient signal levels, a orange hashed polygon is shown on Exhibit D2 illustrating the service gap resulting from inadequate SINR levels. As can be seen, the mid-band SINR map shows large areas with SINR values less than the minimum design level required. At mid-band, 73% of the drive test area has a SINR value less than 10 dB, with 9% of the area showing SINR values less than or equal to zero. The mid-band SINR gap is approximately 0.39 square miles, including 1.1 miles from Ocean Ave to Scenic Road, south of 17th Avenue, and that an overwhelming percentage of the area driven does not meet the Verizon performance criteria. According to the 2020 US Census data there are approximately 994 residents living in the Service Gap area.

Mid C-Band Drive Test Analysis

Attached as Exhibit E is a: Verizon Wireless 3700¹¹ MHz LTE (5G) Drive Test Map that demonstrates the results of a drive test performed for the purpose of evaluating existing 5G (LTE) coverage in the vicinity of the Proposed Site. The map represents 5G (LTE) reference signal strength in the 3700 MHz band. The map identifies RSRP levels greater than or equal to -95 dBm as blue circles, RSRP values less than -95 dBm and greater than or equal to -98 dBm as green circles, RSRP values less than -98 dBm and greater than or equal to -101 dBm as yellow circles, RSRP levels less than -101 dBm and greater than or equal to -104 dBm as grey circles and RSRP values less than -104 dBm as black circles. Verizon's goal is to provide reliable 5G in-building residential service to the Service Gap area. The existing service gap area is identified with a orange hashed polygon.

¹¹ The 3700 MHz band, known as C-Band, due to its higher frequency range has even more limitation with regard to coverage range. Additional C-Band offers 140 MHz of bandwidth which will require more overall power to penetrate buildings. Utilization of beamforming techniques can help extend the coverage range to mimic the range of the 1900 & 2100 MHz bands, however; even with advanced beamforming techniques, the mid-band significant gap would still exist and be no less than what is currently represented by the 2100 MHz band gap defined herein.

As can be seen on Exhibit E, almost the entire drive test area fails to meet the residential in-building coverage requirement. This is due to the fact that Verizon has not yet deployed C band at the Downtown Carmel site or the SF South Carmel 003 node, and the approved small cells SF South Carmel 002 and SF South Carmel 005 are not yet operational. The deployment of the C band is planned as part of an overall introduction of new 5G services to the area. It should be noted that even if the C Band 3700 MHz frequencies were deployed at these locations, the resulting drive test signal strength data values would be equivalent to or less than those measured for the mid-band, and would still illustrate a service gap, requiring a new facility to introduce the new 5G service.

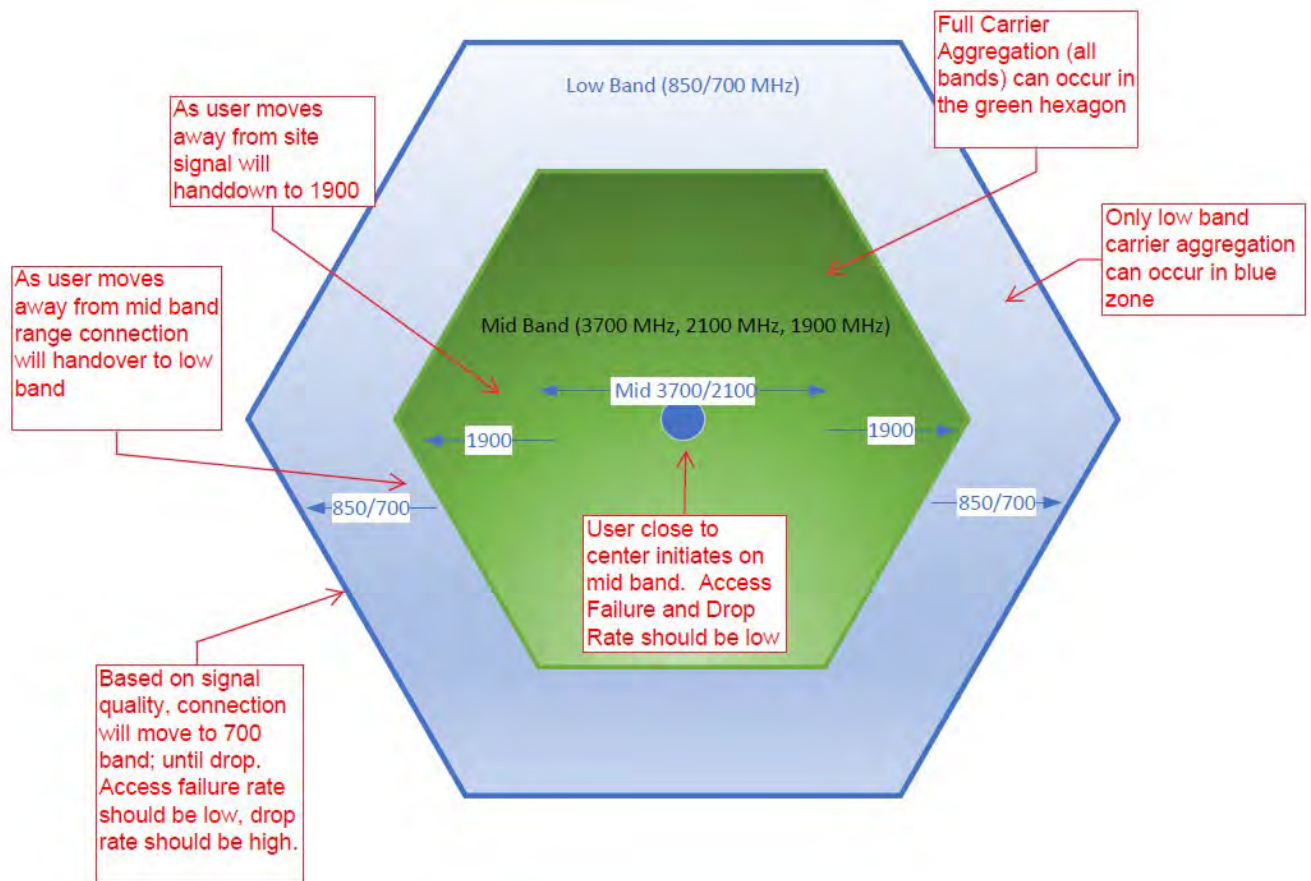
The Service Gap, represented on Exhibit E by the red hashed polygon, is approximately 0.47 square miles and is primarily based on the residential homes north, south, and east of the Proposed Site. According to the 2020 US Census data there are approximately 1224 residents living in the Service Gap area.

Based upon the drive test map data collected and analyzed, Verizon is unable to meet the service goals with respect to coverage as specified in section 3 of this report. Specifically, the drive test maps indicate the existence of significant gaps in 4G & 5G LTE reliable in-building residential coverage as demonstrated by the RSRP maps, and inadequate signal quality as demonstrated by the SINR maps.

7 KEY PERFORMANCE INDICATORS

In addition to confirming that Verizon Wireless has a significant gap in its 4G & 5G service with Drive Test Maps, we have also evaluated Verizon's Key Performance Indicator Data ("KPIs"). The KPIs utilized consist of VoLTE drop call failure rates, user downlink utilization data, and call quality indicator data. The KPI data that is relevant is based upon the surrounding sites and sectors that are providing signal, albeit poor signal or poor signal quality, to the significant gap area. The KPIs analyzed and provided herein are for the 4G/LTE services in each of the frequency bands referenced. The KPI data collected and analyzed consists of busy hour data over a 90-day period from November 15, 2024, through February 11, 2025. The data analyzed and provided herein in the form of charts are for the sites and sectors that have been determined to provide the best (not necessarily adequate) serving signal within the Service Gap areas.

When reviewing KPI data, it is important to understand how the wireless connection operates from one frequency band to another. As noted earlier in this report, the propagation characteristics and capacity within each band differ. A 4G/5G LTE connection is based upon signal quality and where adequate signal is available, is prioritized to the mid-band higher capacity frequencies. For example, if a wireless user is within good signal range of a nearby cell site, the user's device will connect on a mid-band frequency and as the user moves away from the facility, the user's device will continuously be updated with neighboring cell signal quality information. As the signal quality degrades on the current connected frequency band, the connection will move to the next better quality frequency band. The logical connection flow is illustrated in the diagram below:



In regard to the diagram above, the green shaded hexagon area represents the coverage range of the mid-band frequencies. The blue (and green) shaded hexagon area represents the coverage range of the low-band frequencies. As a user moves away from a serving sector, the LTE connection will transition from 3700/2100 MHz down to a 1900 MHz connection. This will occur, up, and until, the signal quality on the last mid-band frequency needs to transition to a low-band frequency. This transfer is called a handover or hand-down.

The diagram above can also be used to understand carrier aggregation. Carrier aggregation is a feature of LTE that allows a user device to utilize resources from multiple different frequency bands (low-band and mid-band) at the same time. This feature allows for increased capacity and throughput. However, for carrier aggregation to work, there must be adequate signal strength and quality in the frequencies. From the graphic above, for example, if the mid-band coverage isn't adequate, carrier aggregation can only be supported on the low-band frequencies. If the low-band frequency coverage is provided from the cell edges of the surrounding sites, for example, with no dominant server, then the signal quality will be poor, and even with carrier aggregation on low-band, the service will be inadequate.

Key Performance Indicator (KPI) Analysis

Each of Verizon's active sites are monitored continuously for various performance metrics which are known as key performance indicators or KPIs. In order to determine which sites and sectors the KPIs are coming from the RF engineer must determine what are the dominant serving transmitters in the area of the gap. This is often referred to as a "dominant server". Dominance refers to the best or strongest whereas server refers to a particular transmitter. Each site includes a series of antennas which are oriented in a particular direction. Each antenna is connected to a transmitter at the base of the structure. The antennas and transmitters together provide signal to a given area.

Table 2 below represents the relevant sites and sectors that have been determined to provide a dominant signal to various areas of the coverage gap. The KPIs from these sites are analyzed in the section to follow.

Table 2		
SITE & SECTOR	Low Band %	Mid Band %
Downtown Carmel Gamma	10%	7%
Founders Building Beta	31%	41%
Pebble Beach Tennis Club Beta	5%	8%
SF South Carmel 003 Alpha	37%	28%
SF South Carmel 003 Beta	8%	5%

From the table above the Founders Building Beta and SF South Carmel 003 Alpha provide the majority of the dominant signal in the area, therefore, the KPIs for these two sectors will be the most applicable. Please refer to Exhibit F (Low Band Best Serving Transmitter), and Exhibit G (Mid Band Best Serving Transmitter) for a graphical representation of the areas of signal from the surrounding sites and sectors in the table above.

VoLTE Drop Call Rate (KPI) Analysis¹²

The VoLTE drop call rate from the KPI charts provided in Exhibit H indicate, as expected, the highest rate of drop calls in low band frequencies. This is due to the lack of mid-band signal suitable for use forcing all wireless traffic onto the low band frequencies which eventually drop. A description of each drop call rate chart from the applicable sectors is as follows:

- Founders Building Beta – Provides low band dominant signal to 31% of the significant gap area as illustrated on Exhibit F and 41% of mid-band dominant signal as illustrated on Exhibit G.
 - The 700 MHz chart, (page 24 of the Exhibits) indicates that the drop rate exceeded 1% for 93% during the busy hour (with peaks over 20% failure rate) over the 90 day period evaluated. This demonstrates that while 700 MHz provides the greatest range of coverage, the system is experiencing an excessive amount of drop calls. Therefore, regardless of the adequate RSRP levels found, there remains a significant gap in the area of the Proposed Site.
 - The 850 MHz chart, (page 25 of the Exhibits) indicates that the drop rate exceeded 1% for 58% of the time during the busy hour (with peaks over 12% failure rate) over the 90 day period evaluated. Similar to the 700 MHz band, the system is experiencing an excessive amount of drop calls.
 - The 1900 MHz chart, (page 26 of the Exhibits) indicates that the drop rate exceeded 1% for 56% of the time during the busy hour over (with peaks over 7% failure rate) the 90 day period evaluated. Similar to the low bands, the mid band system is experiencing an excessive amount of drop calls.
- SF South Carmel 003 Alpha - Provides low band dominant signal to 37% of the significant gap area as illustrated on Exhibit F and 28% of the dominant signal at mid band illustrated on Exhibit G.

¹² In LTE networks, the dropped call rate (DCR) refers to the percentage of calls that are unexpectedly terminated or dropped due to network issues, rather than a user hanging up. International Telecommunication Union ITU-T E.807 specifies a threshold of 1% or less for call drop rates (CDR) as part of its QoS guidelines for mobile networks. All drop call rates provided in this report are specifically VoLTE drop call rates.

- o The 700 MHz chart, (page 27 of the Exhibits) indicates that the drop rate exceeded 1% for 47% of the time during the busy hour (with peaks over 18% failure rate) over the 90 day period evaluated. This demonstrates that while 700 MHz provides the greatest range of coverage the system is experiencing an excessive quantity of drop calls. Therefore, regardless of the adequate RSRP levels found, there remains a significant gap in the area of the Proposed Site.
- o The 850 MHz chart, (page 28 of the Exhibits) indicates that the drop rate exceeded 1% for 18% of the time during the busy hour (with peaks over 13% failure rate) over the 90 day period evaluated. Similar to the 700 MHz band, the system is experiencing an excessive amount of drop calls.

Downlink Throughput (Capacity¹³) Analysis

The downlink utilization from the KPI data analyzed, based on busy hour data, for the entire 90-day time period analyzed from November 15, 2024, through February 11, 2025, indicated several sectors with periods with downlink throughput less than 5 Mbps. Verizon's performance requirement is to provide a minimum of 5 Mbps consistently to its users. Note, the FCC as recently as last March 2024 increased the mobile broadband benchmark to 35 Mbps downlink throughput per user. See attached charts in Exhibit I (pages 30 to 32 of the Exhibits). The relevant sectors and frequency bands are as follows:

- Founders Building Beta 700 MHz- Downlink user throughput was less than 5Mbps for approximately 88% of the busy hour 90 day time period analyzed. Verizon holds 10 MHz of spectrum in this frequency band.
- Founders Building Beta 850 MHz- Downlink user throughput was less than 5 Mbps for approximately 10% of the busy hour 90 day time period analyzed. Verizon holds 10 MHz of spectrum in this frequency band.
- Founders Building Beta 1900 MHz - Downlink user throughput was less than 5 Mbps for approximately 39% of the busy hour 90 day time period analyzed. Verizon holds 5 MHz of spectrum in this frequency band.

The data above indicates the Founders Building site providing signal to the service gap area (31% at low band and 41% and mid band) cannot meet the 5Mbps performance requirement, specifically in the three frequency bands with the limited licensed 10 MHz and 5MHz of spectrum. This is an indication that the site is currently providing inadequate signal strength (RSRP) and contributing to interference (SINR) resulting in lower throughput levels.

8 VERIZON'S PROPOSED SOLUTION

In seeking to remedy the significant gap in coverage and compromised network performance, due to the lack of reliable inbuilding signal strength, the Verizon Wireless radio frequency engineering department is seeking to place a third small cell in the gap area. Small cell placement requires precise location planning, as a small cell is limited in height, coverage, and spectrum allocation. A small cell will provide reliable coverage for a typical range of four blocks, and the location must fit in like a piece of a missing puzzle. The following information provided will demonstrate that the proposed small cell location is properly chosen and will optimally integrate with Verizon's existing and approved site coverage.

Referring to exhibits C2 , D1 and D2, the proposed wireless communication site is located logically and in the center of the mid-band coverage gap (D1) and centrally located in the center of the SINR gap area for low band (C2) and mid-

¹³ LTE capacity issues, often manifesting as slow speeds or dropped connections, arise from factors like network congestion, signal interference, and poor coverage, impacting user experience and data throughput.

band (D2) SINR gap¹⁴. When proposing a new wireless communications facility, it is extremely important to have the location as near the center of the service gap area as possible. Having a small cell facility at the center of a service gap area provides omnidirectional service, allowing for optimal performance of the site. This design approach assumes the intended overall coverage area is very similar in topography and morphology. Equally as important to the location, is the required height necessary to remedy the significant coverage gap for the carrier's licensed frequency bands. Insufficient height at a location will not maximize the site's ability to remedy the coverage gap and therefore require additional wireless facilities.

In addition to identifying the location of the proposed small cell in relation to the current coverage gap, the effects of expected coverage from the approved small cells in the immediate area must also be evaluated. To remedy the Service Gap Verizon has proposed a 50-foot small cell, with their antennas located at a 48.7 foot centerline elevation. The proposed site is located on Carmelo Street between 10th Avenue and 11th Avenue, and approximately 0.43 miles north of the approved small cell SF South Carmel 002. Attached as Exhibit J is an EDX Signal Pro¹⁵-generated map illustrating the drive test signal levels measured with the overlaid expected coverage from the approved SF South Carmel 002 and SF South Carmel 005 small cells. The SF South Carmel 002 is a 50 foot small cell expected to provide reliable 4G LTE residential in-building coverage utilizing the Mid-band PCS and AWS frequency bands, and reliable 5G services utilizing the C-band 3700 MHz frequencies. The SF South Carmel 005 small cell is located 0.64 miles to the east and will provide minimal coverage to the gap area due to its limited 50' height, and the topographical change in elevation between Junipero Street and San Carlos Street.

As can be seen on Exhibit J, SF South Carmel 002 will provide reliable in-building residential coverage to a portion of the overall service gap area, however, as expected, this small cell will not address the entire service area gap. This site is expected to provide reliable in-building mid band coverage to 0.07 square miles, and 201 residents, addressing 25% of the overall mid band gap area¹⁶.

Attached as Exhibit K is an EDX Signal Pro-generated map illustrating the drive test signal strength data measured and overlaid with: (1) the expected coverage provided by the approved SF South Carmel 002 and SF South Carmel 005 small cells, and (2) the expected coverage from the proposed small cell site SF South Carmel 001. The drive test data is shown as blue circles indicating measured RSRP levels greater than or equal to -95 dBm. Expected -95 dBm RSRP coverage provided by the approved locations is shown in blue, and the expected -95 dBm RSRP coverage provided by the proposed site is shown in green. As can be seen on Exhibit K, the proposed site will provide reliable in-building residential coverage to .1 square miles, 372 residents, and remedy an additional 37% of the gap area. The proposed site is expected to provide reliable in-building residential coverage to the immediate area which includes Ocean Avenue to 13th Avenue, and San Antonio Avenue to Dolores Street.

8.1 ALTERNATIVE SITES

As part of our overall analysis, PierCon reviewed a report dated November 2021 prepared by Columbia Telecommunications Corporation providing the City of Carmel-by-the-Sea with a review of Verizon's wireless application. The report included an analysis of Verizon's existing coverage provided by surrounding sites, and the recommendation of an alternative site location at the Golden Bough Playhouse.

The report states on page 5 "We found evidence of a lack of in-building coverage as defined by Verizon's coverage standards in the low-band 700MHz spectrum and high-capacity PCS/AWS mid-band spectrum in the area targeted by this facility" which would be consistent with the findings in this report. Specifically for low band, poor signal quality is

¹⁴ Proposed small cell location accounts for the approved small cell SF South Carmel 002 located 0.44 miles to the south.

¹⁵ EDX Signal Pro is an industry standard software used to create radio frequency coverage maps for radio frequency bands from 138 MHz (VHF) to 5 GHz.

¹⁶ Area and population data provided is calculated using MapInfo Professional, which is an industry standard Geographic Information System (GIS) software, used to analyze geographical data, integrating data from various sources, including 2020 census data for population.

present as demonstrated with poor SINR levels measured, appearing as inadequate coverage levels. Inadequate mid band coverage levels are also demonstrated by the drive test maps included in this report, including the RSRP and SINR maps. Furthermore, the CTC report also states on page 5, “Approval of this application will enhance Verizon Wireless’ service to customers in the vicinity of the proposed site”. PierCon also agrees with this statement.

The CTC report provides an alternate site location at the Golden Bough Playhouse, which is located between Monte Verde Street and Cassanova Street between 9th and 8th Avenue, two blocks north and three blocks east of the proposed site and located in a Tier II A-1 Theatrical zone. The Golden Bough Playhouse site is a building rooftop approximately 23’ in height above ground, compared to the 47.5’ height for the proposed small cell.

The CTC report uses computer simulation coverage maps to compare the coverage expected from Verizon’s proposed site and the Golden Bough site, along with Verizon’s existing coverage, and suggests the results are equivalent, if not better with the Golden Bough location.

Attached as Exhibit L is a map showing the current and approved Verizon in-building residential coverage, defined as RSRP greater than or equal to -95 dBm. The map shows RSRP signal level collected during the drive test indicated by blue circles. The expected in-building coverage from the approved sites is also indicated by a blue color. For clarity, only RSRP levels greater than or equal to -95 dBm are shown. The existing, approved and proposed sites are labeled, as well as the CTC proposed Golden Bough site location. The coverage gap is identified with an orange hashed line. As can be seen from Exhibit L, reliable in-building coverage levels are currently provided by the SF South Carmel 003 between Mission Street to four blocks west to Monte Verde Street, and the existing Downtown Carmel site also provides reliable in-building coverage to Cassanova Street, which is four blocks west of that site. The location of the Golden Bough site is at the edge of Verizon’s existing reliable coverage. Using EDX Signal Pro to generate coverage (shown in green) with an omni directional antenna, much of the coverage expected from the Golden Bough site would be redundant to the north, east, and south, making it a poor site location to address the coverage gap. Substantial coverage overlap will appear as interference, such as demonstrated in the poor SINR maps, due to improper site placement. The Golden Bough Playhouse will provide reliable in building coverage to .07 square miles, 241 residents, addressing 25% of the coverage gap. This expected coverage is 11% less area and 17% less population compared to that expected from the proposed site. The in-building coverage overlap (interference) provided by the Golden Bough Playhouse is approximately .09 square miles, which is 129% interference compared to new coverage offered to the area¹⁷. The deployment of an omni directional antenna at this location would provide more interference than new coverage to the area, rendering the site extremely inefficient to meet Verizon’s coverage objectives.

Attached as Exhibit M is a modified version of Exhibit L, illustrating the expected coverage from the Golden Bough site, using a clover shape omni antenna with only two sectors active to minimize overlap with existing coverage. These canister antennas are fixed with 120 degrees of spacing between sectors, and azimuths of 200 degrees and 320 degrees were chosen to best address the service gap area. As can be seen on Exhibit M, even with the use of antenna directionality, a substantial amount of coverage overlap would occur with the existing coverage provided by the Downtown Carmel site and the SF South Carmel 003. Substantial coverage overlap will appear as interference, such as demonstrated in the poor SINR maps, due to improper site placement. In this configuration, the Golden Bough site would provide reliable in building coverage to .085 square miles, 372 residents and address 31% of the coverage gap. This expected coverage is 6% less area when compared to that expected from the proposed site. In this configuration, the Golden Bough Playhouse would provide .072 square miles of in-building coverage overlap (interference), or 85% interference compared to new coverage offered to the area, also making this site and configuration inefficient to meet Verizon’s coverage objectives.

The alternative Golden Bough Playhouse will not effectively address the coverage gap, limit the ability to improve and enhance existing service, and limit the ability to introduce new services. The expected coverage from the Golden Bough site would be mostly redundant if using a small cell omni type antenna and offer limited coverage as a sectorized site, if

¹⁷ The 129% was calculated by comparing the undesired overlap region to the desired covered area.

using a low profile canister clover type antenna. From an RF perspective, the Golden Bough site and location is not an equivalent to the proposed site, as it is located on the edge of existing Verizon service, and offers mostly redundant in-building coverage. The location limits the overall effectiveness of a new wireless facility to provide new services by restricting the coverage area to the west. This geographic coverage restriction further limits Verizon's ability to enhance the network and optimally balance user demand by limiting the site to two of three sectors, or 33% reduction in otherwise available spectrum resources.

8.2 LEAST INTRUSIVE

The Proposed Site is the least intrusive because it remedies a significant portion of the service gap area (37% of the mid band gap, and 372 residents), without the need for a macro wireless facility, requiring significant infrastructure. As stated previously, the installation of a macro site requires: sufficient structure space for the antenna array, sufficient building or ground space for the transmitter equipment cabinets, battery backup, emergency generator, and requires commercial grade electrical service and sufficient backhaul infrastructure-often in the means of new fiber installation or microwave antennas. Meeting these requirements are infeasible in a single family residential neighborhood, and the aesthetics of such an installation would not minimize the adverse aesthetic impacts to Carmel-by-the-Sea's "village in a forest by the sea" character.

The proposed small cell site will replace an existing 38 foot 11 inch utility pole with a taller 49 foot 10 inch pole, inclusive of a 2 foot 6 inch cylindrical antenna at the top, and associated radio equipment located on the side between 7 and 17 feet above ground. This small cell structure design is already present throughout Carmel with six Verizon small cells operational in the Carmel Woods/Northeast Carmel area, and two other small cell sites approved in the South Carmel area.

The proposed replacement utility pole is the most compatible structure selection type in the Public Rights-of-Way per code section 17.46.040 D.2, and second most compatible structure selection type per code section 17.46.040 D.1.d, seemingly making the proposed site a desired location and structure type most compatible with the City's code requirements, given the limiting compatibility rankings. The additional special considerations requirement identified in section 17.46.40.E then further states "Applicants shall not propose to install wireless facilities in/on a highly incompatible location in the public right-of-way unless the application is accompanied by a request for a special exception finding under CMC [17.46.080\(C\)](#)", immediately followed by "The following is a list of highly incompatible locations: a. Any location in the public right-of-way within the single-family residential zoning district."

Attached as Exhibit M1 is a zoning map of the subject area within the city limits, with existing Verizon site locations, and the mid band gap area shown in previous exhibits. The zoning map clearly shows that only R-1 (light yellow) and R-4 (orange) zones are present in the service gap, with the one exception of the A-1 Theatrical zone parcel (light blue).

In an attempt to satisfy the City's requirements, Verizon identifies the following:

There are no Tier III (most compatible) Central commercial (CC), service commercial (SC), and community and cultural (A-2) zones that are available or feasible for a new Verizon facility.

There are no Tier II (compatible) Improved parklands (P-2), natural parklands and preserves (P-1), and theatrical (A-1) zones available or feasible for a new Verizon facility.

Both items above lead to the conclusion that a new needed Verizon facility must be placed in a Tier I location, consisting of the following zones: Senior citizen facility (A-3), multifamily residential (R-4), single-family residential (R-1), and residential and limited commercial (RC). As mentioned previously, there only exists predominately an R-1 zone and one R-4 zone. The one A-1 zone is not a feasible location.

The code specifies a preference of public and private parcels to Public Rights-of-Way, however given the prior logical conclusions, only single family residential homes are present in the final remaining zone, leaving the Public Rights-of-Way the last remaining feasible option. With regard to meeting the most compatible structure selection type identified in 17.46.040D.1.e as “Existing nonbuilding structures with existing wireless facilities”, there are no existing wireless facilities in the subject area that Verizon can co-locate on. Furthermore, any existing small wireless facilities will not support co-location due to restrictions on height and equipment space. The conclusion is that the only remaining feasible option is a new small wireless facility located in a residential zone in the Public Rights-of Way.

Carmel-by-the-Sea’s code further restricts the replacement of existing structures or placement of new structures, requiring the structure not to be placed “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 facade of any occupied residential building” or “Within a 500-foot radius from another wireless facility within the public rights-of-way”

A topographical Google Earth review of the residential area was conducted where the new Verizon small cell facility would have to be located, centered on Carmelo Street between 10th and 11th Avenues, and bounded by the area between 9th Ave and 12th Ave, and San Antonio Ave to Camino Real, to minimize coverage overlap with existing and approved sites, and to maximize the ability to provide new 5G services. Attached as exhibit M2 is a Google Earth map of the subject area, identifying the existing utility poles marked as colored circles numbered 1 to 40, and the center of the area marked with a green bullseye. Utility poles with transformers are identified with red circles and are prohibited locations for wireless equipment.. The remaining utility poles are identified by either orange or green circles, indicating the pole may be a viable location subject to additional evaluation. The Google Earth imagery date for the information in this analysis is 9/2024, and is subject to final field verification.

There were a total of 40 utility pole locations identified in the area above. Of the 40 utility pole locations, 17 utility poles have existing transformers located on them, eliminating 42.5% of the utility poles as possible small cell site locations and leaving 23 (57.5%) possible existing locations. Of the remaining 23 utility poles, poles 38, 18, 20, 21 and 22 appear to violate 17.46.40.E.2.a. Poles 21 and 22 are short utility poles requiring a greater than 10’ extension as well. This leaves 18 pole locations (45%). Pole 39 is a short utility pole that would require a greater than 10’ extension to provide the necessary coverage leaving 17 pole locations (42.5%). Poles 28 and 29 are located under larger trees, and the replacement of the existing pole with a taller one does not appear feasible leaving 15 pole locations (37.5%). Poles 32, 34, and 36 are at the lowest ground elevation between 60 and 63 feet (compared to 79 feet at the proposed location), and the furthest west in or just outside the service gap area, limiting coverage to the east as the elevation on Cassanova Street rises from 100’ near 12th Avenue to 122’ at 9th Avenue. These 11 poles have been marked in orange on the map, indicating they are not adequate RF locations, or they would represent more intrusive locations. This leaves 12 possible remaining locations for a small cell location (30%). Of the 12 pole locations remaining, those north of 10th Avenue (poles 17 and 19) will be much more likely to produce redundant coverage with that existing at mid-band. (Refer to Exhibit J). Similarly, those pole locations south of 11th Avenue (poles 14, 25, 26, 27) will be very likely to provide redundant coverage to that expected from the approved SF South Carmel 002 site. (Refer to Exhibit J). These 6 poles have also been marked in orange on exhibit M2. This leaves the optimal RF placement between 10th and 11th Avenues, and between Carmelo Street and Camino Real and 6 utility pole locations (15%) (pole numbers 1, 8, 10, 12, 20, 24 marked as green circles). The reader will note that the proposed Verizon small cell location is one of the optimal 6 remaining locations nearest the center of the identified area and labeled as pole 1.

The proposed small cell antenna support structure would be of similar height and type as that existing to minimize visual impact and is comparable to existing transformers at the top of utility poles throughout neighborhoods. The proposed site is centrally located in the service gap area, allowing even distribution of coverage and capacity, maximizing the site’s potential to address Verizon’s design and performance goals. In doing so, the number of overall wireless telecommunications sites required is minimized.

10 CONCLUSION

PierCon Solution's analysis of Verizon Wireless' existing network coverage indicates that a significant coverage gap in wireless service exists in the Carmelo Street area. The service gap area is 0.27 square miles at mid-band, 0.43 square miles at low band, and 0.47 square miles at C-band. The areas are primarily based on the residential homes north and south of the Proposed Site. According to the 2020 US Census data there are approximately 776 residents living in the low band service gap area, 994 residents in the mid band service gap area and 1224 residents in the C-band service gap area. Drive test data provided in this report demonstrates the specific geographic area lacking reliable in-building coverage for Verizon's FCC licensed mid band frequencies. Further Key Performance Indicator (KPI) data provided demonstrates the existing wireless sites providing service to the subject area are not meeting the industry standard performance metrics and cannot be altered or upgraded to address the subject area.

Both aforementioned items lead to the conclusion that a new wireless facility is necessary to address these network reliability issues. Verizon proposes a new small cell facility which has been evaluated to remedy the lack of in-building coverage and network KPI issues. By proposing a small cell capable of providing coverage and capacity in the FCC licensed mid-bands, where Verizon has 175 MHz of spectrum available, the proposed small cell can remedy a significant portion of the service gap with minimal infrastructure and intrusion. Even though the drive test analysis demonstrates a significant gap in low-band reliable signal quality, the deployment of low band spectrum provides a limited 20 MHz of licensed spectrum resources. A small cell deployed establishing reliable in building residential signal levels at mid band frequencies would also allow optimization of the existing Verizon sites providing coverage at the low band frequencies and provide the ability to reduce the existing interference. Only once the proposed small cell is installed, and network optimization is completed can Verizon evaluate the Carmel-by-the-Sea wireless network to determine the extent of any further service enhancements.

The location of a new Verizon wireless facility must be located in an R-1 zone to perform optimally with the existing sites and minimize the need for additional wireless facilities. The proposed small cell location allows for the provision of enhanced 4G services and new 5G services where there is a current deficiency. The new Verizon facility will integrate with the existing infrastructure and allow for competitive services to be provided. 40 utility poles in the service gap R-1 area were identified, and 62.5% (25 of the 40) were not feasible locations, leaving a total of 15 pole locations to provide the needed RF service. The remaining 15 utility pole locations were further reviewed for compliance with code requirements, feasibility, and the ability to integrate with Verizon's existing wireless sites to provide the necessary RF coverage to the service gap area, leaving 6 viable locations for a new small cell site.

Having reviewed the proposed site and other technical information evaluated in this report, PierCon Solutions believes the proposed small cell site location and height is the best suited from an RF perspective to remedy the significant coverage gap and address the current compromised network performance. The proposed installation will aid in improving coverage to the area, providing reliable mid-band coverage, and thus improving Verizon Wireless customers' experience on the network throughout the area immediately surrounding Carmelo Street. The proposed small cell site is located in a densely populated residential area, centered between approved small cell sites SF South Carmel 002 and SF South Carmel 005.

The small cell design allows for the replacement of an existing utility pole with a similar structure and would minimize the visual impact of a needed new wireless facility. The proposed small cell site will provide enhanced reliable 4G in-building residential coverage to 0.1 square miles, 372 residents, and introduce new 5G coverage and services, remedying 37% of the identified service gap area. The proposed site, together with the approved SF South Carmel 002 small cell will address 62% of the of the overall mid band gap area, and 74% of the overall population in the mid band gap area, surpassing the results obtained from other alternate site combinations evaluated. The proposed site best integrates with the existing Verizon network and minimizes site-to-site interference, maximizing the site's ability to remedy the significant coverage gap and address the poor network key performance indicators. A coverage summary for in building residential reliable service is provided in Table 3 below.

Table 3 – Summary of Expected In-building coverage from reviewed sites

	Area/Covered area (sq mi)	% Area coverage provided	% area coverage including SF South Carmel 002	Coverage Overlap (sq mi)	Interference Contribution % (Overlap Coverage area to Desired Coverage area)
Mid Band Gap	0.27				
Proposed Site	0.1	37%	62%	0.048	48%
Golden Bough Omni	0.07	25%	50%	0.09	129%
Golden Bough 2 sector Clover	0.085	31%	56%	0.072	85%
Pole 14	0.08	29%	54%	0.045	56%
SF South Carmel 002	0.07	25%	NA	NA	NA

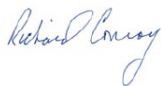
Finally, the proposed new facility will be an integral part of an overall network upgrade providing new 5G services to the area. The reliable in-building residential coverage expected includes Carmelo Street from Ocean Ave to Santa Lucia Ave, and between San Antonio Ave to Lincoln Street.

After performing the independent radiofrequency analysis, PierCon Solutions concludes that this facility is essential to Verizon Wireless' network design in and surrounding the Carmel-by-the-Sea immediate area.

Report Prepared by:



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10/14/2025



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10 APPENDIX 1 - EXHIBITS

Exhibit A	Verizon Site Table
Exhibit B	Verizon's Site Distance Map
Exhibit C	Verizon Wireless 700 MHz LTE (4G) Drive Test Map
Exhibit C1	Verizon Wireless 700 MHz LTE (4G) Drive Test Map
Exhibit C2	Verizon Wireless 700 MHz LTE (4G) Drive Test Map -SINR
Exhibit D	Verizon Wireless 2100 MHz LTE (4G) Drive Test Map with Service Gap
Exhibit D1	Verizon Wireless 2100 MHz LTE (4G) Drive Test Map with Service Gap
Exhibit D2	Verizon Wireless 2100 MHz LTE (4G) Drive Test Map SINR with Service Gap
Exhibit E	Verizon Wireless 3700 MHz LTE (5G) Drive Test Map
Exhibit F	Verizon Wireless 700 MHz LTE (4G) Drive Test Map
Exhibit G	Verizon Wireless 2100 MHz LTE (4G) Drive Test Map
Exhibit H	VoLTE Drop Call Rate (KPI) Analysis
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Exhibit J	Verizon's Existing Coverage with Approved Sites Coverage
Exhibit K	Verizon's Existing Coverage with Approved and Proposed Coverage
Exhibit L	Verizon's Existing Coverage with Approved and Alternative Coverage -Small Cell
Exhibit M	Verizon's Existing Coverage with Approved and Alternative Coverage -Sectors
Exhibit M1	Zoning Map with Verizon Sites and Mid Band Gap
Exhibit M2	Google Earth Image with Utility Pole Locations and Mid Band Gap Area

11 APPENDIX 2 – 3GPP LINK BUDGET

12 APPENDIX 3 – DRIVE TEST DATA - TABLE FORMAT

Exhibit A

Verizon Site Table

Existing Site	Frequency Bands/Technology	Antenna Height (ft)	Azimuth (°)	Longitude	Latitude	Type
SF SOUTH CARMEL 003	L700, L850, L1900, L2100	57	210, 330	-121.921208	36.550992	ROOFTOP
DOWNTOWN CARMEL	L700, L850, L1900, L2100, N850, N3700	33	20, 140, 260	-121.922197	36.554658	EME_Building
PEBBLE BEACH TENNIS CLUB	L700, L850, L1900, L2100, N3700	30	15, 115, 275	-121.9439806	36.56653333	ROOFTOP
FOUNDERS BUILDING	L700, L850, L1900, L2100	65	0, 120, 240	-121.957136	36.580394	STEALTH STRUCTURE
CARMEL CYPRESS	L700, L850, L1900, L2100, N850, N3700	45	30, 160, 280	-121.9070361	36.54169722	STEALTH STRUCTURE
CHOMP MACRO	L700, L850, L1900, L2100	42, 45	55, 145, 235, 325	-121.9133278	36.57833611	ROOFTOP
SF NORTH CARMEL 001	L1900, L2100	48	0	-121.9177639	36.56883333	UTILITY POLE/TOWER
SF NORTH CARMEL 002	L1900, L2100	51	0	-121.9153694	36.56880556	UTILITY POLE/TOWER
SF NORTH CARMEL 003	L1900, L2100	52	0	-121.9185167	36.56674444	UTILITY POLE/TOWER
SF NORTH CARMEL 004	L1900, L2100	36	0	-121.9150111	36.56546944	UTILITY POLE/TOWER
SF NORTH CARMEL 005	L1900, L2100	42	0	-121.9190333	36.56441944	UTILITY POLE/TOWER
SF NORTH CARMEL 006	L1900, L2100	47	0	-121.9156028	36.56271389	UTILITY POLE/TOWER
AGUAJITO RD SC1	L700, L850, L1900, L2100	27	340	-121.9099778	36.57294722	UTILITY POLE/TOWER
AGUAJITO RD SC2	L700, L850, L1900, L2100	53	295	-121.9043417	36.57153056	POLE UTILITY

Approved Site	Frequency Bands/Technology	Antenna Height (ft)	Azimuth (°)	Longitude	Latitude	Type
SF SOUTH CARMEL 002	L1900, L2100, N3700	49	0	-121.929726	36.543588	POLE UTILITY
SF SOUTH CARMEL 005	L1900, L2100, N3700	43.9	0	-121.915316	36.548868	POLE UTILITY

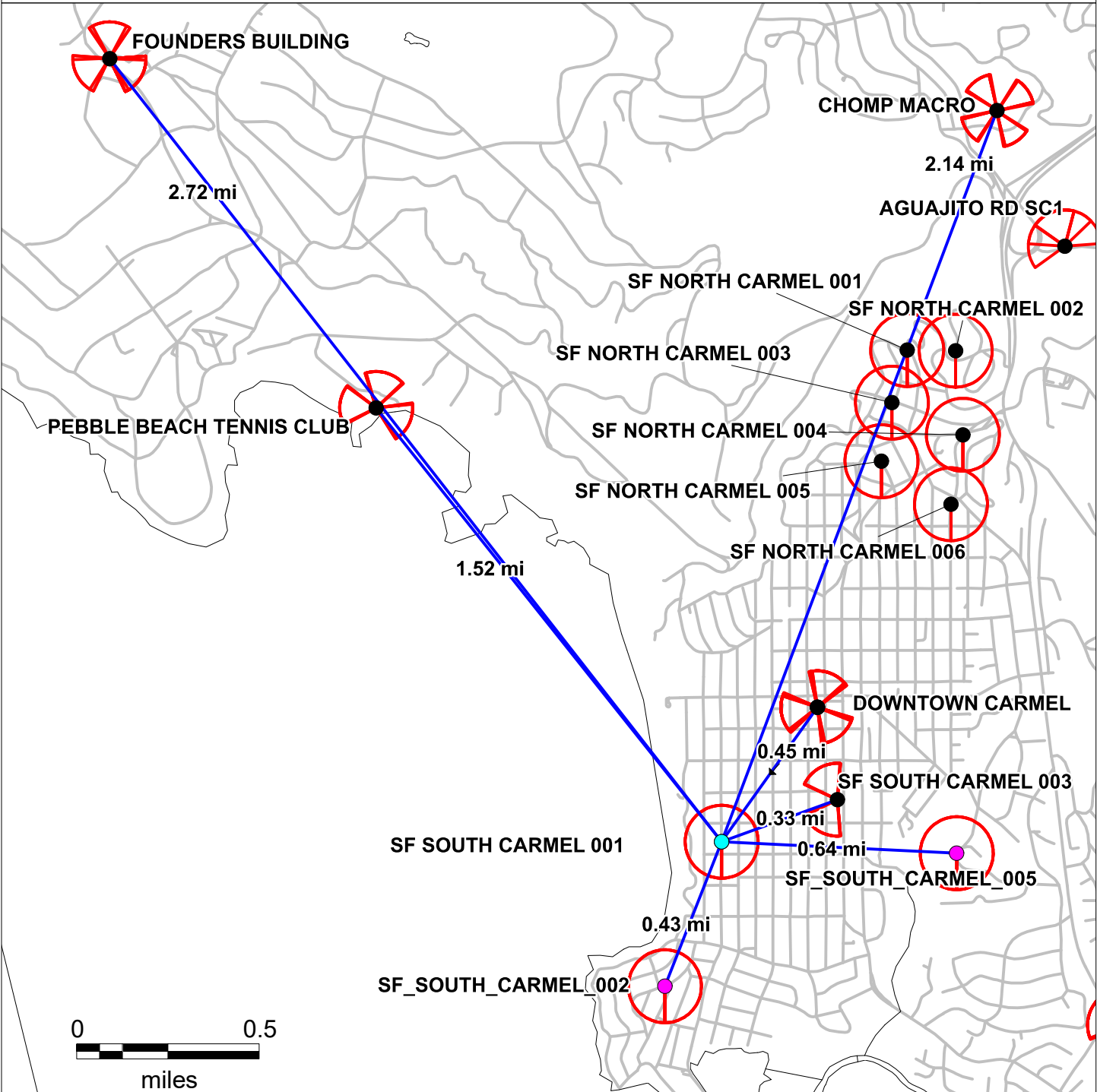
Subject Site	Frequency Bands/Technology	Antenna Height (ft)	Azimuth (°)	Longitude	Latitude	Type
SF SOUTH CARMEL 001	L1900, L2100, N3700	48.7	0	-121.926922	36.549322	PUBLIC LIGHTING STRUCTURE (FREE STANDING)

L=LTE, N=5G

Exhibit B

Verizon's Site Distance Map

VERIZON WIRELESS EXISTING SITES & SITE SEPARATION MAP



- Existing On Air Site
- Approved Site
- Proposed Site
- ✱ Site sectors

— Distance Measured from
Subject Site to Relevant Sites

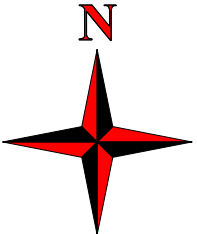


Exhibit C

Verizon Wireless 700 MHz LTE (4G) Drive Test Map

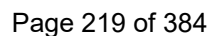


Exhibit C1

Verizon Wireless 700 MHz LTE (4G) Drive Test Map

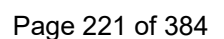


Exhibit C2

Verizon Wireless 700 MHz LTE (4G) Drive Test Map - SINR

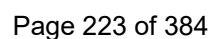


Exhibit D

Verizon Wireless 2100 MHz LTE (4G) Drive Test Map with Service Gap

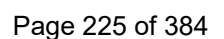


Exhibit D1

Verizon Wireless 2100 MHz LTE (4G) Drive Test Map with Service Gap

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

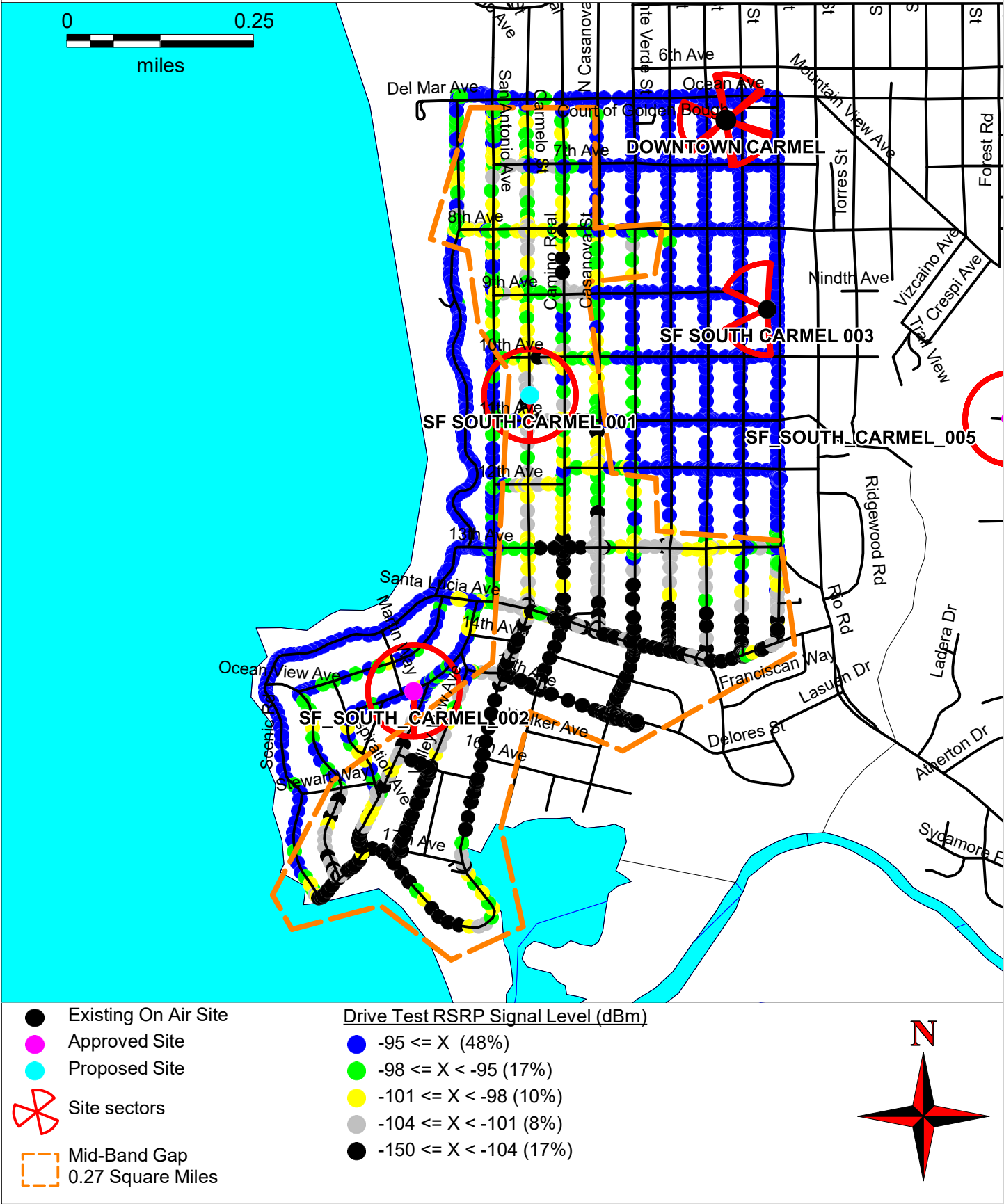


Exhibit D2

Verizon Wireless 2100 MHz LTE (4G) Drive Test Map

SINR with Service Gap

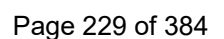


Exhibit E

Verizon Wireless 3700 MHz LTE (5G) Drive Test Map

VERIZON WIRELESS
3700 MHz MID C-BAND - ON AIR DRIVE (SCAN) RSRP DATA
TESTED 2/19/2025

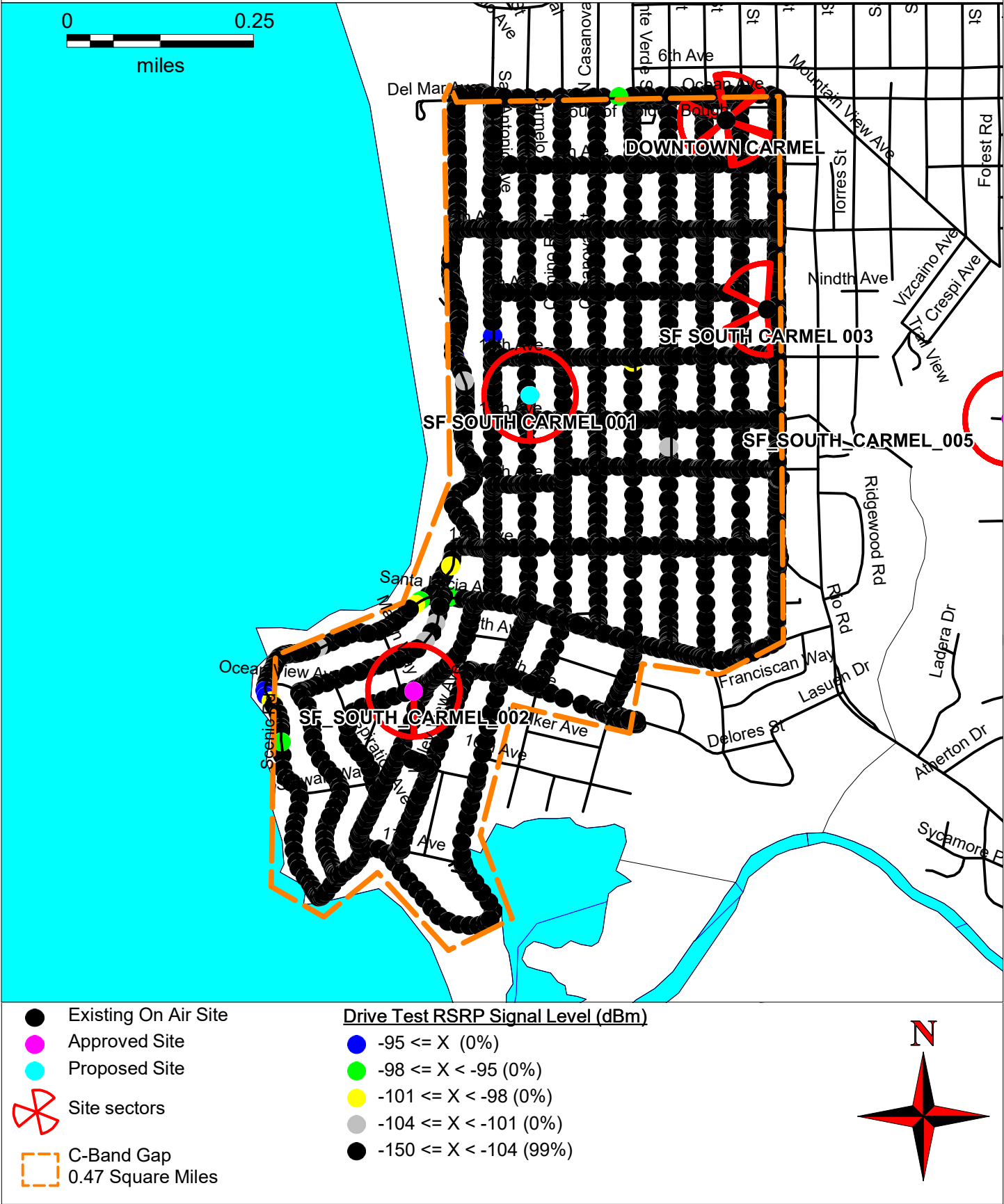


Exhibit F

Verizon Wireless 700 MHz LTE (4G) Drive Test Map

Best Serving Transmitter

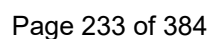


Exhibit G

Verizon Wireless 2100 MHz LTE (4G) Drive Test Map

Best Serving Transmitter

VERIZON WIRELESS BEST SERVING TRANSMITTER IN AREA OF GAP

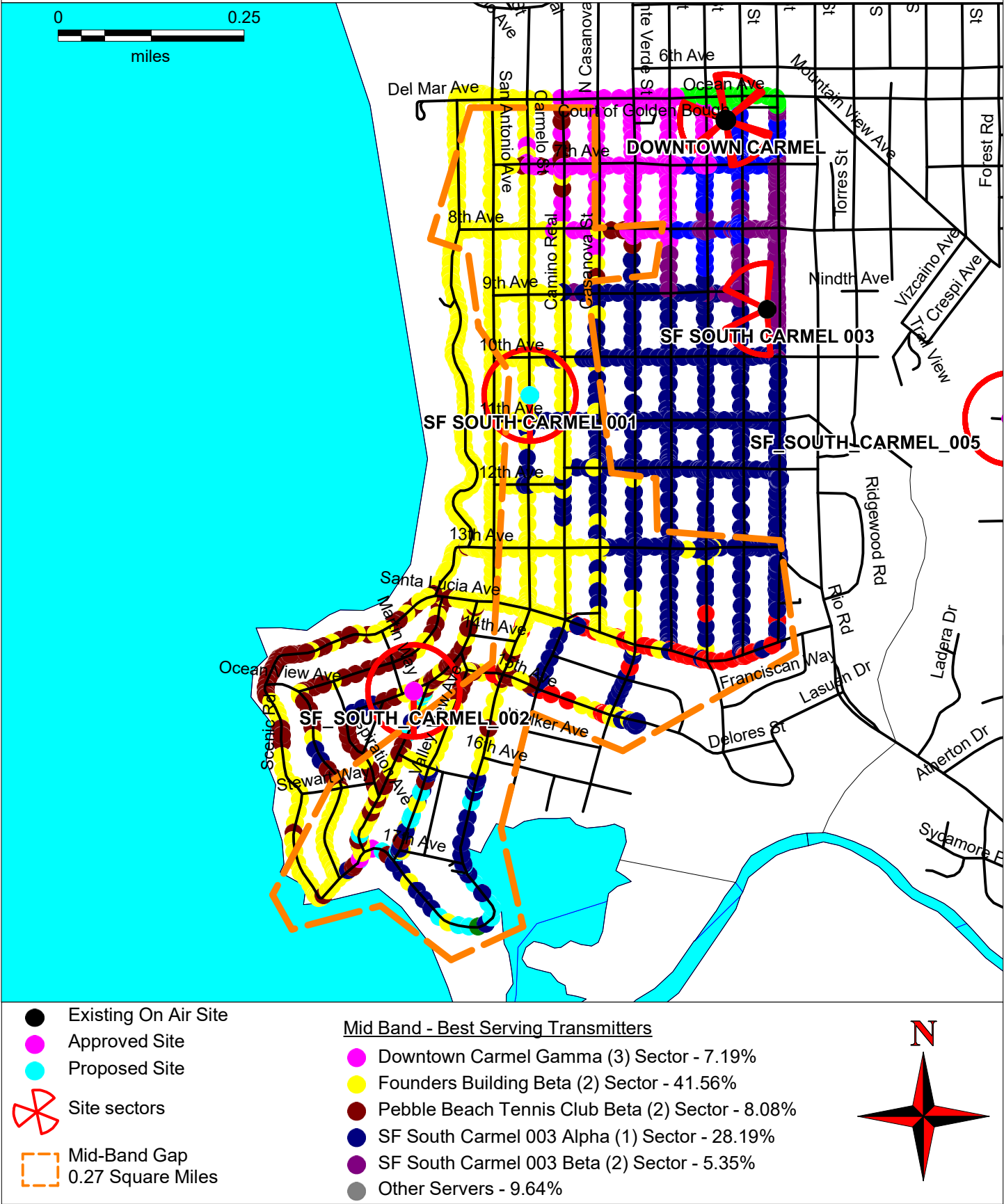
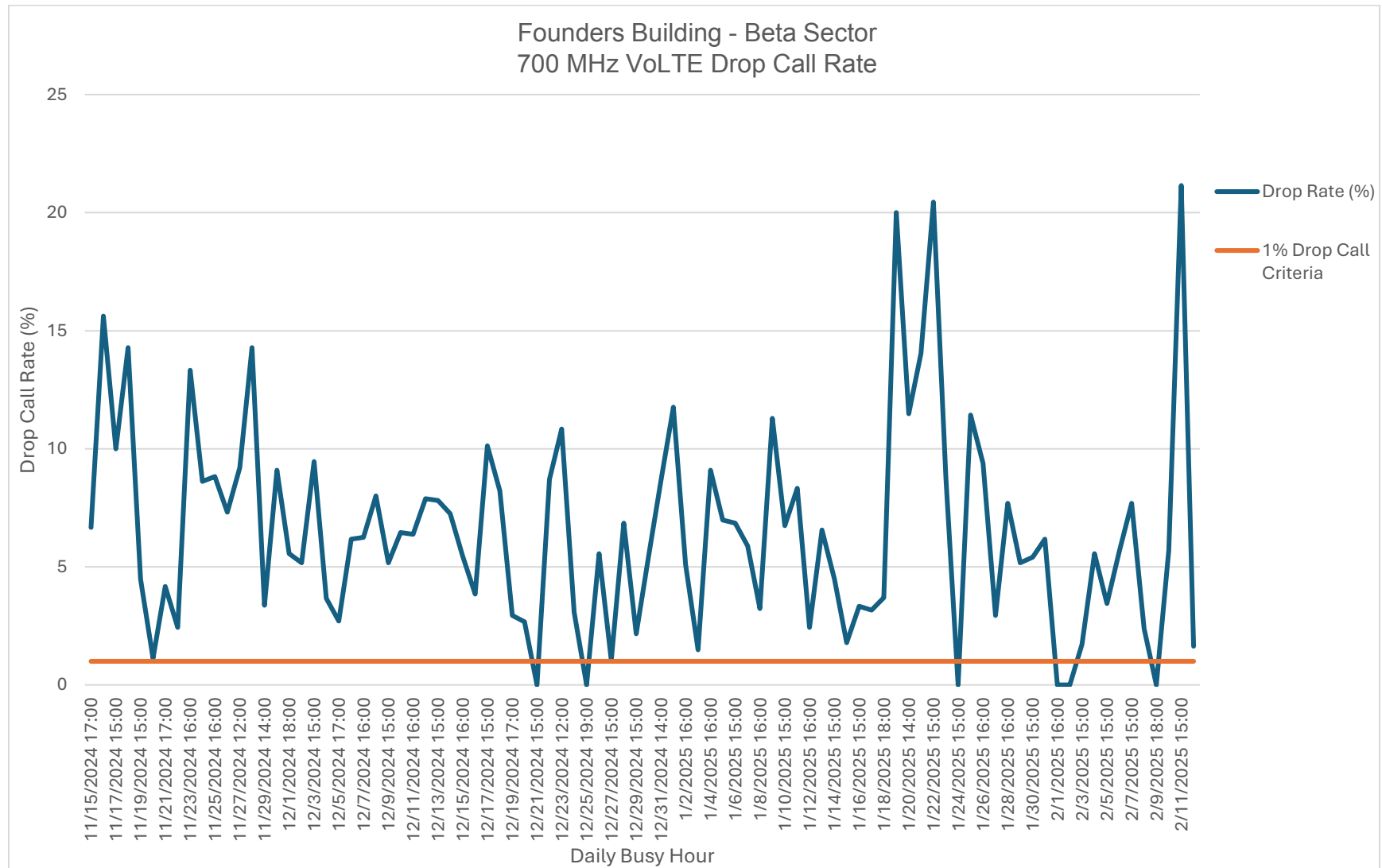


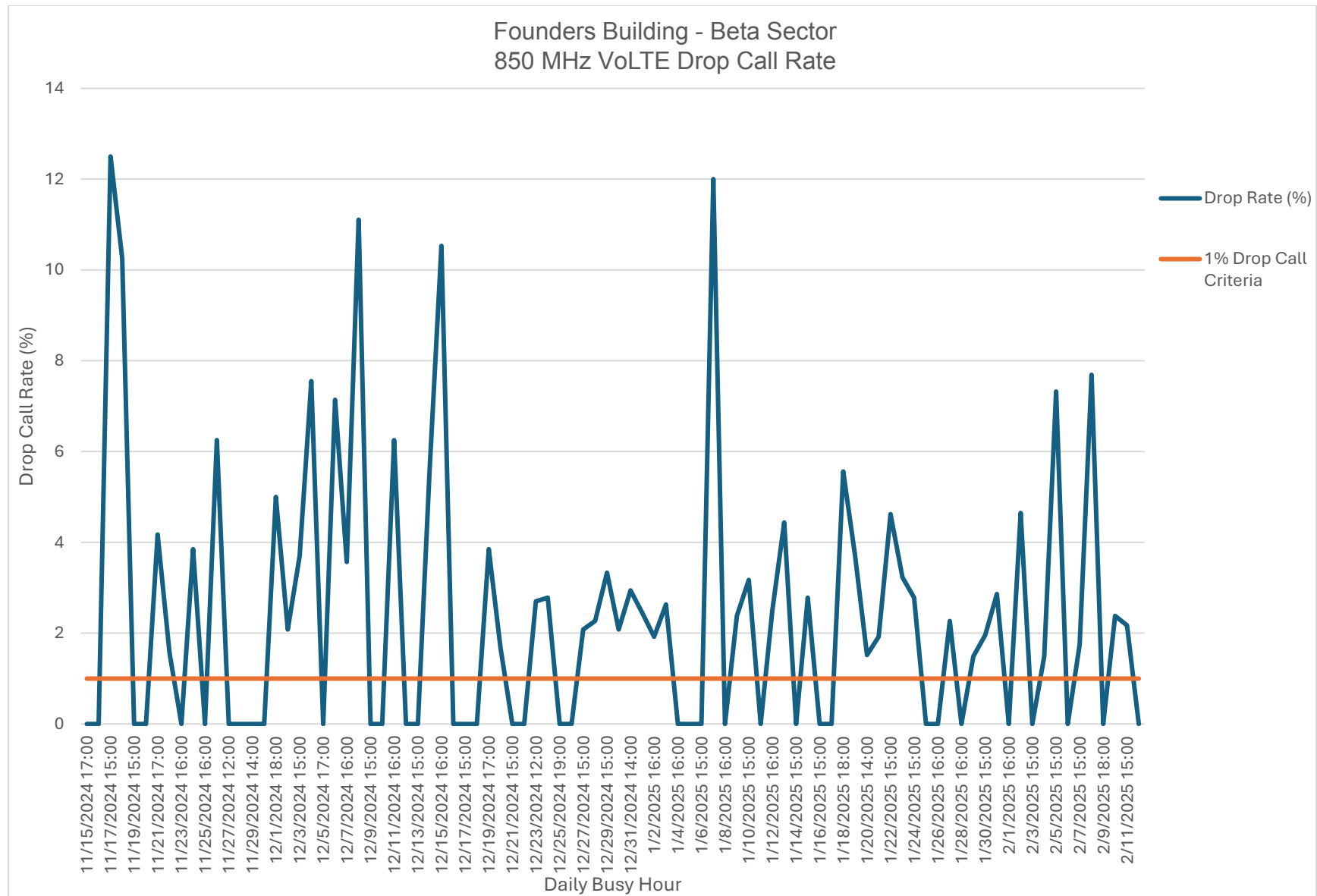
Exhibit H

VoLTE Drop Call Rate (KPI) Analysis

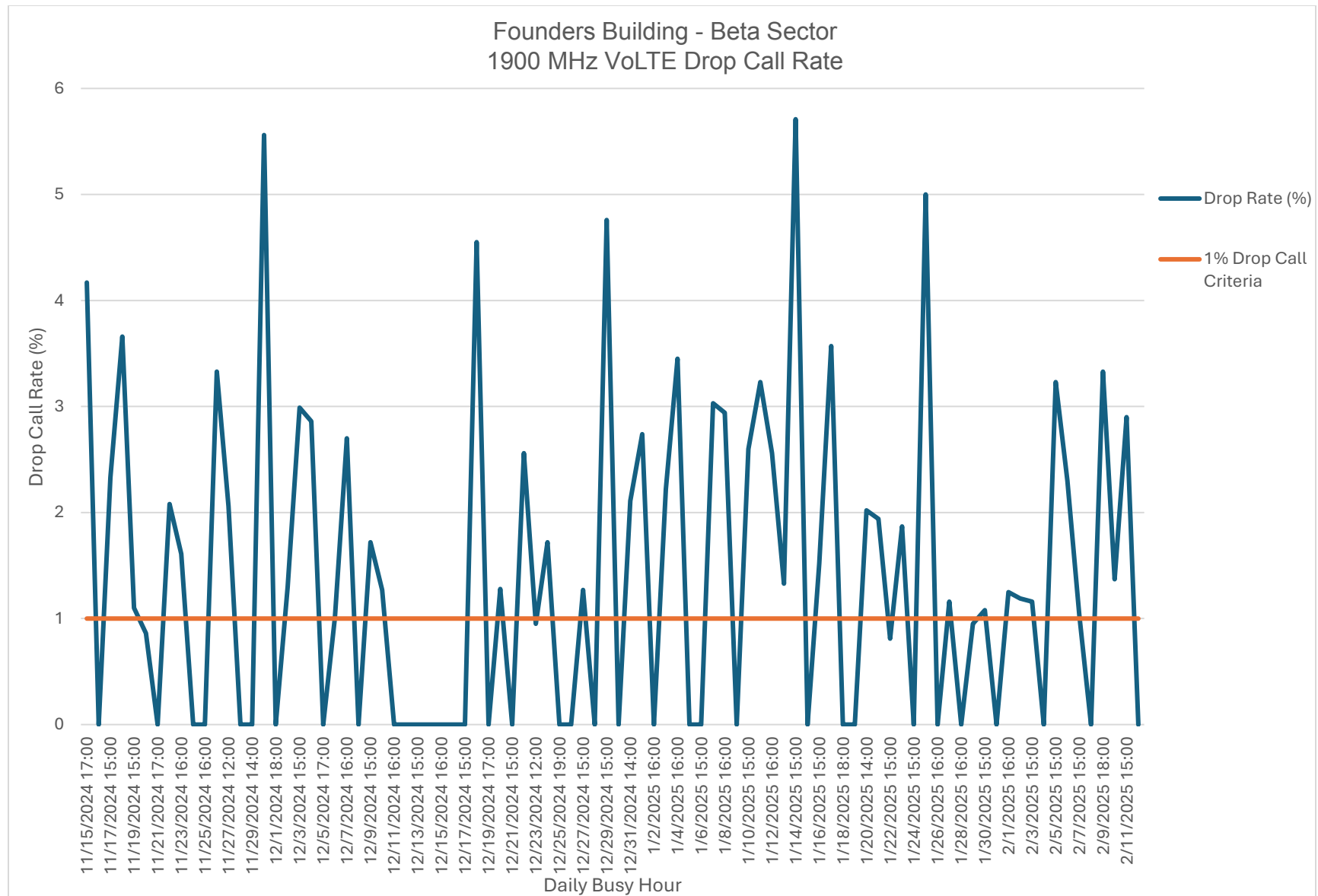
Drop Call Data



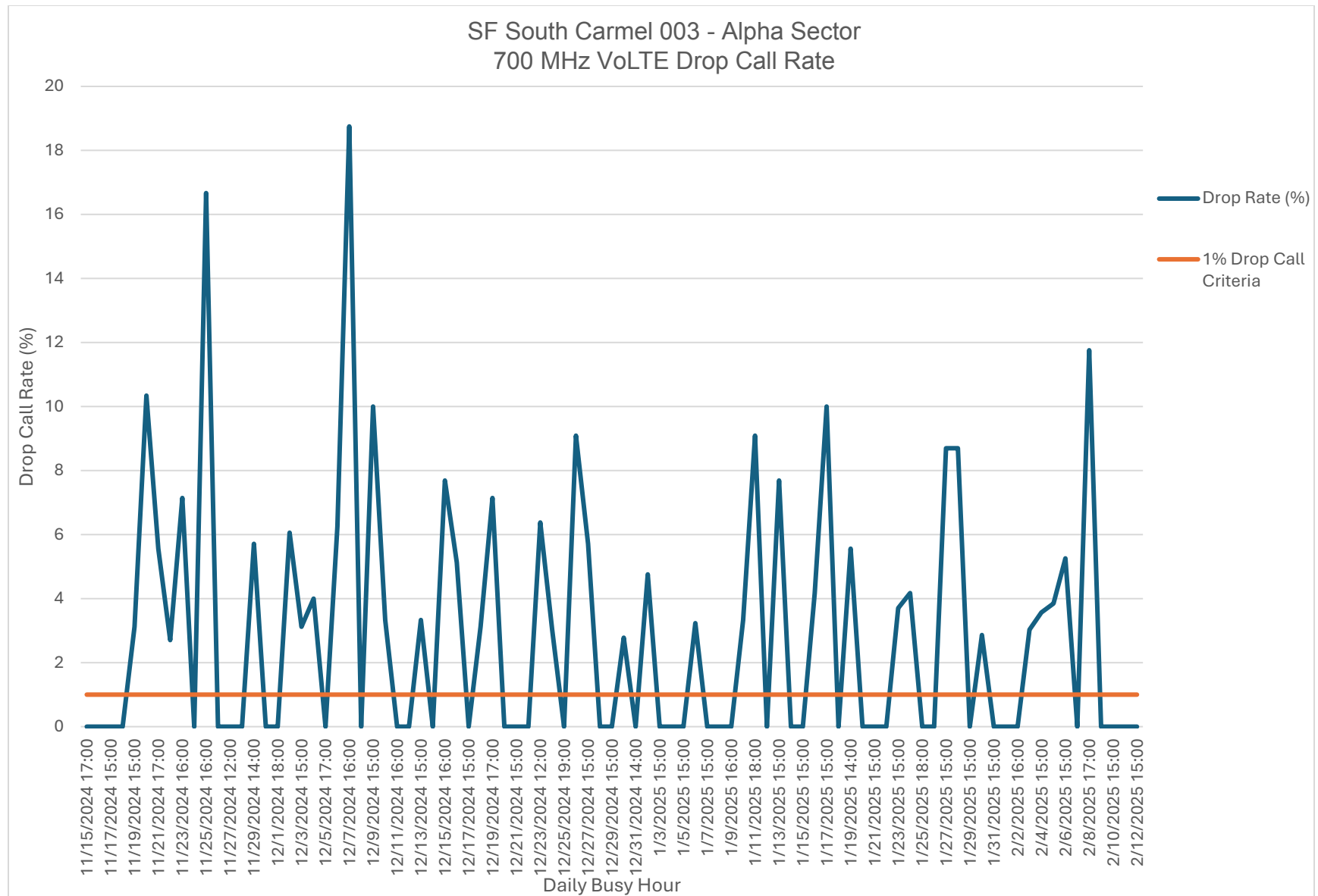
Indicates that the drop rate exceeded 1% for approximately 93% of the 90 day time period.



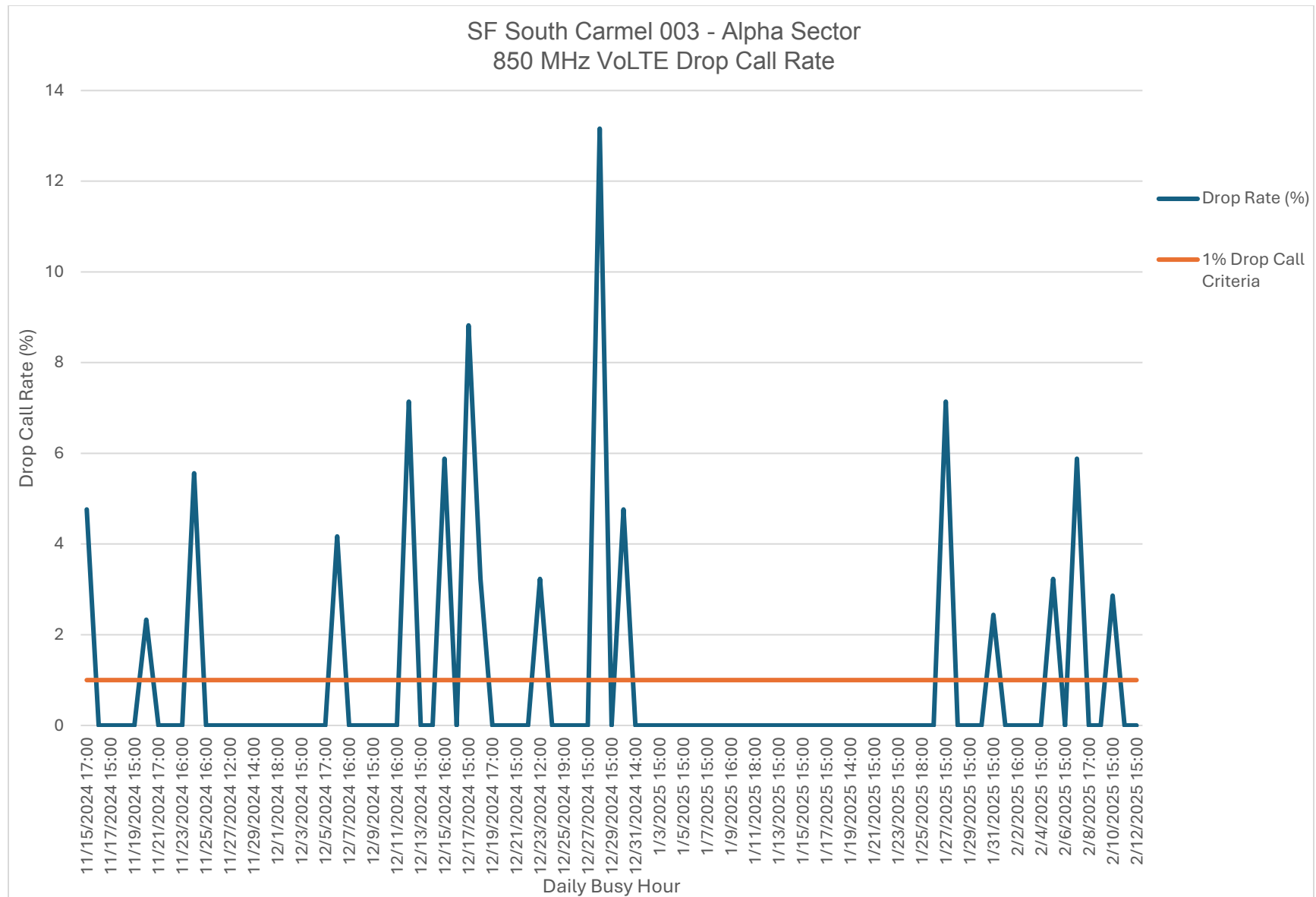
Indicates that the drop rate exceeded 1% for approximately 58% of the 90 day time period.



Indicates that the drop rate exceeded 1% for approximately 56% of the 90 day time period.



Indicates that the drop rate exceeded 1% for approximately 47% of the 90 day time period.

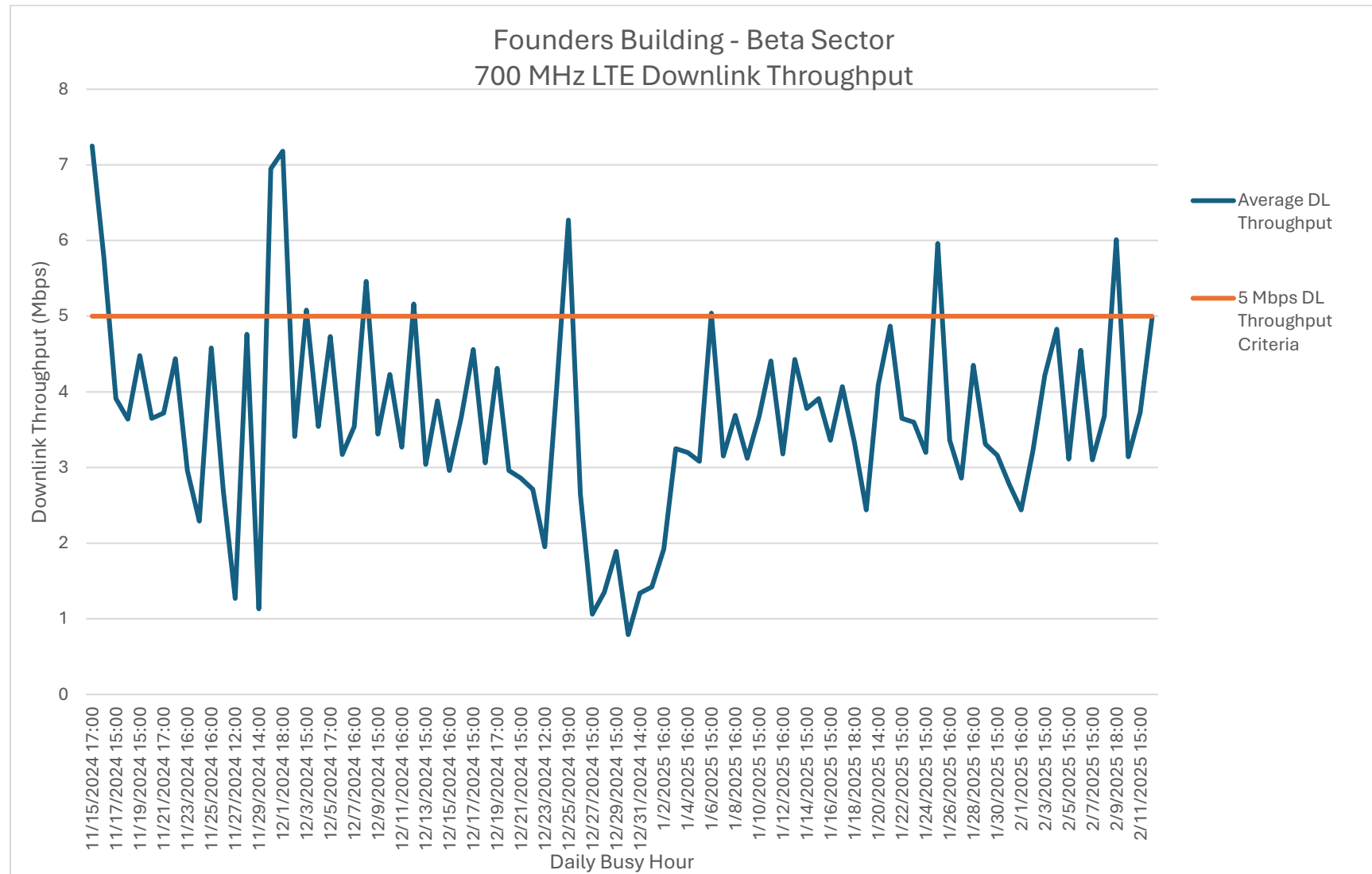


Indicates that the drop rate exceeded 1% for approximately 18% of the 90 day time period.

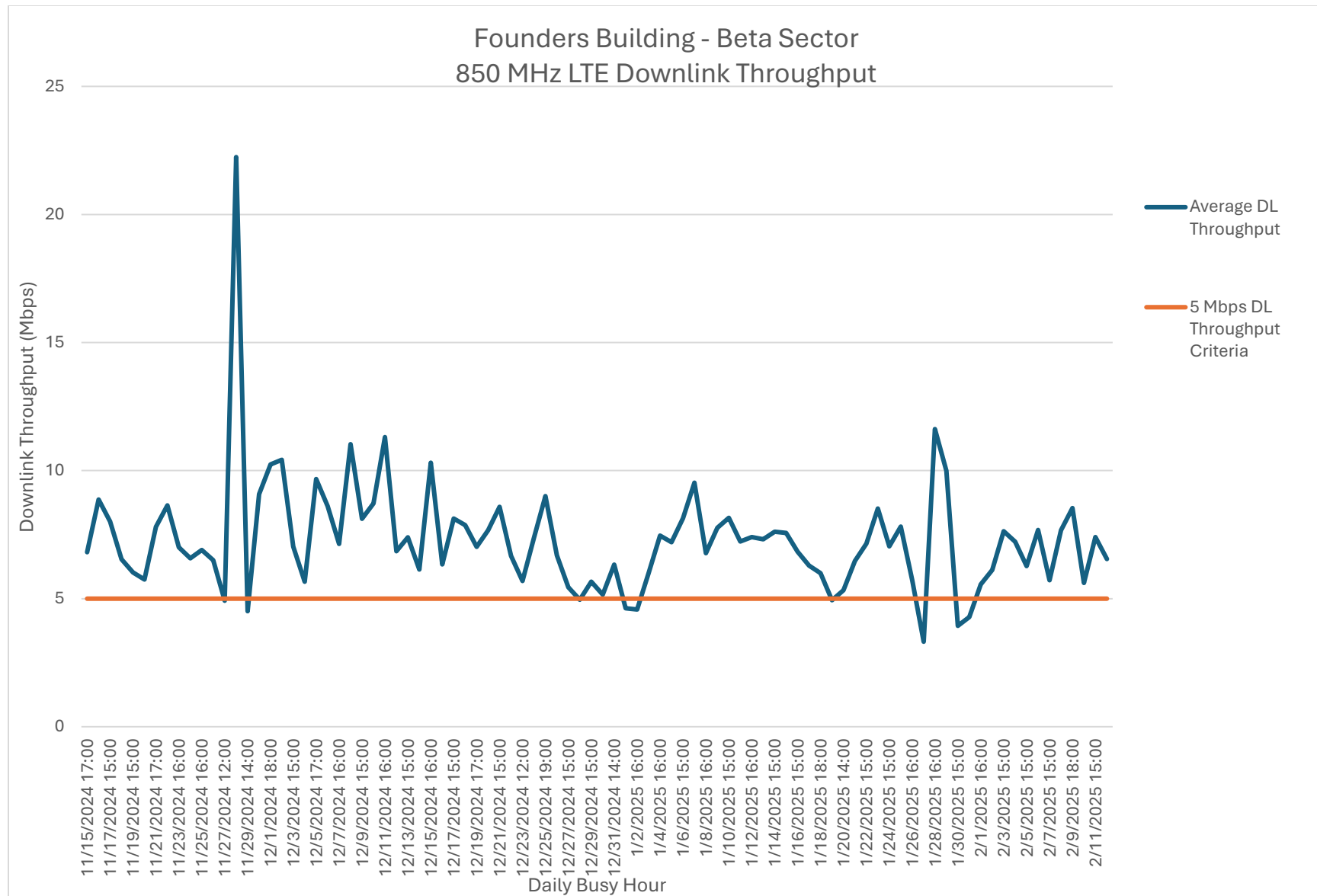
Exhibit I

Downlink Throughput (KPI) Analysis

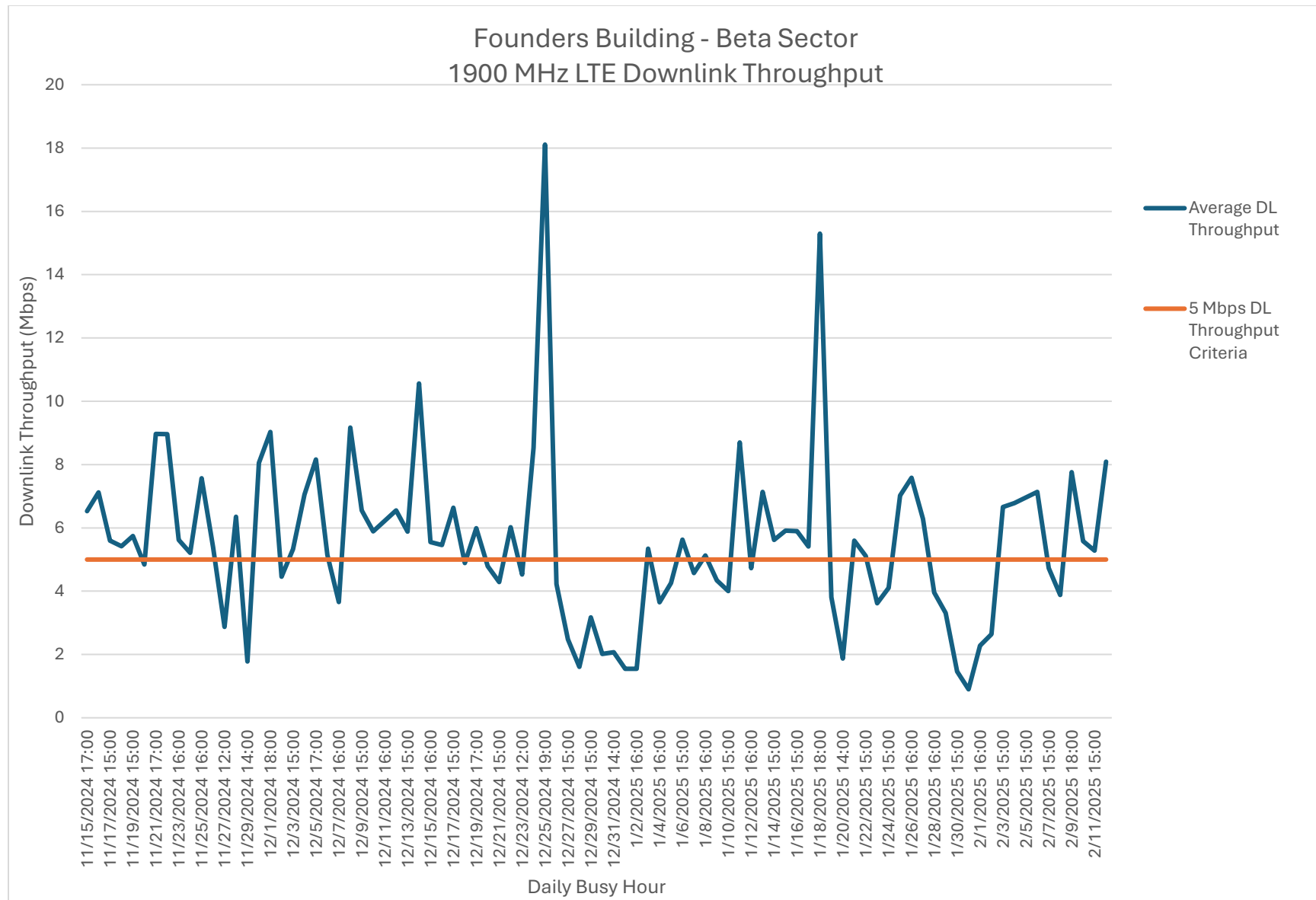
Downlink Throughput Data



Indicates that the downlink throughput falls below 5 Mbps for approximately 88% of the 90 day time period.



Indicates that the downlink throughput falls below 5 Mbps for approximately 10% of the 90 day time period.



Indicates that the downlink throughput falls below 5 Mbps for approximately 39% of the 90 day time period.

Exhibit J

Verizon's Existing Coverage with Approved Sites Coverage

VERIZON WIRELESS
2100 MHz MID BAND - COVERAGE FROM APPROVED SITES
AND EXISTING SITES

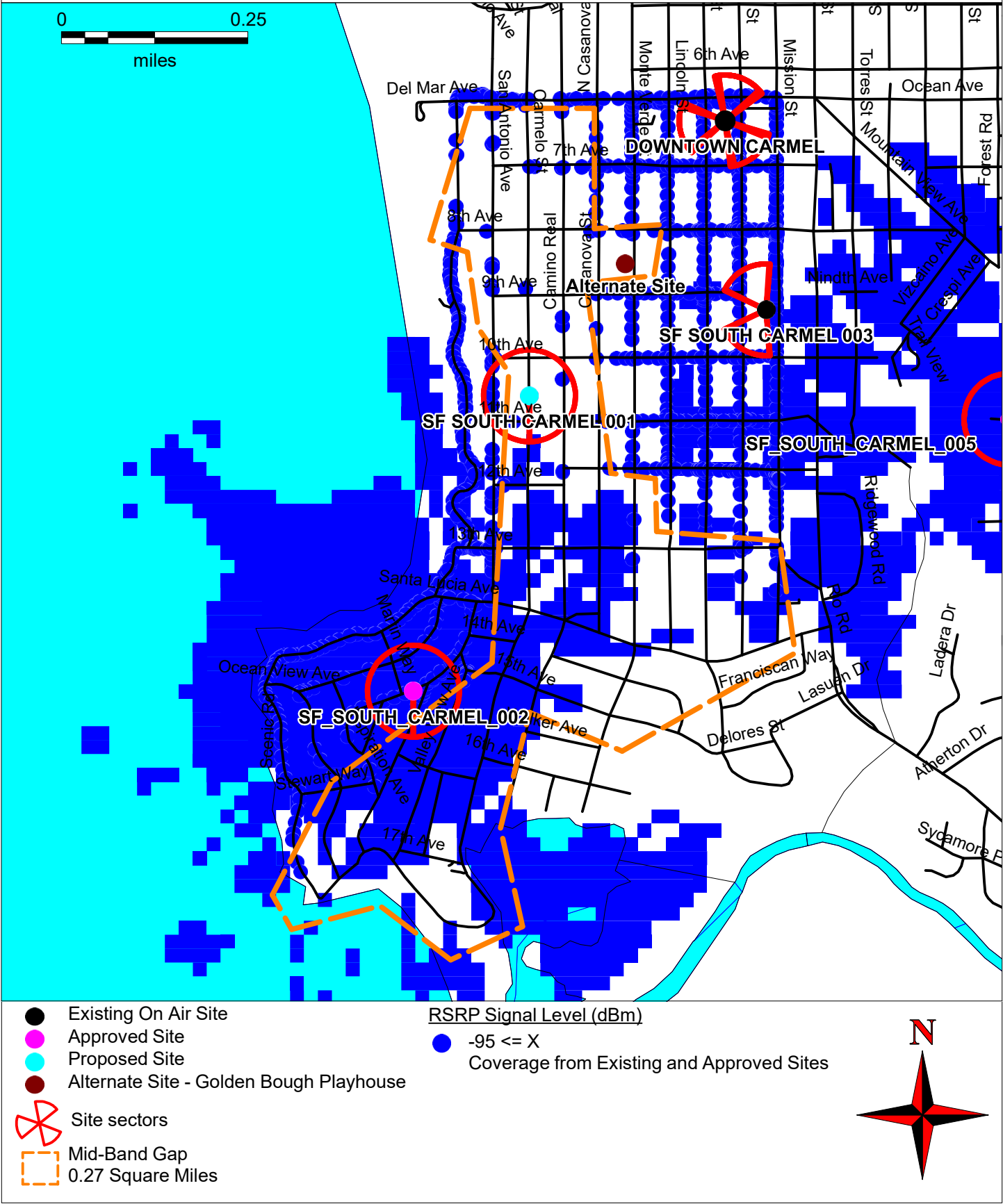


Exhibit K

Verizon's Existing Coverage with Approved and Proposed Sites Coverage

VERIZON WIRELESS

2100 MHz MID BAND - COVERAGE FROM EXISTING, PROPOSED (49 FEET AGL), AND APPROVED SITES

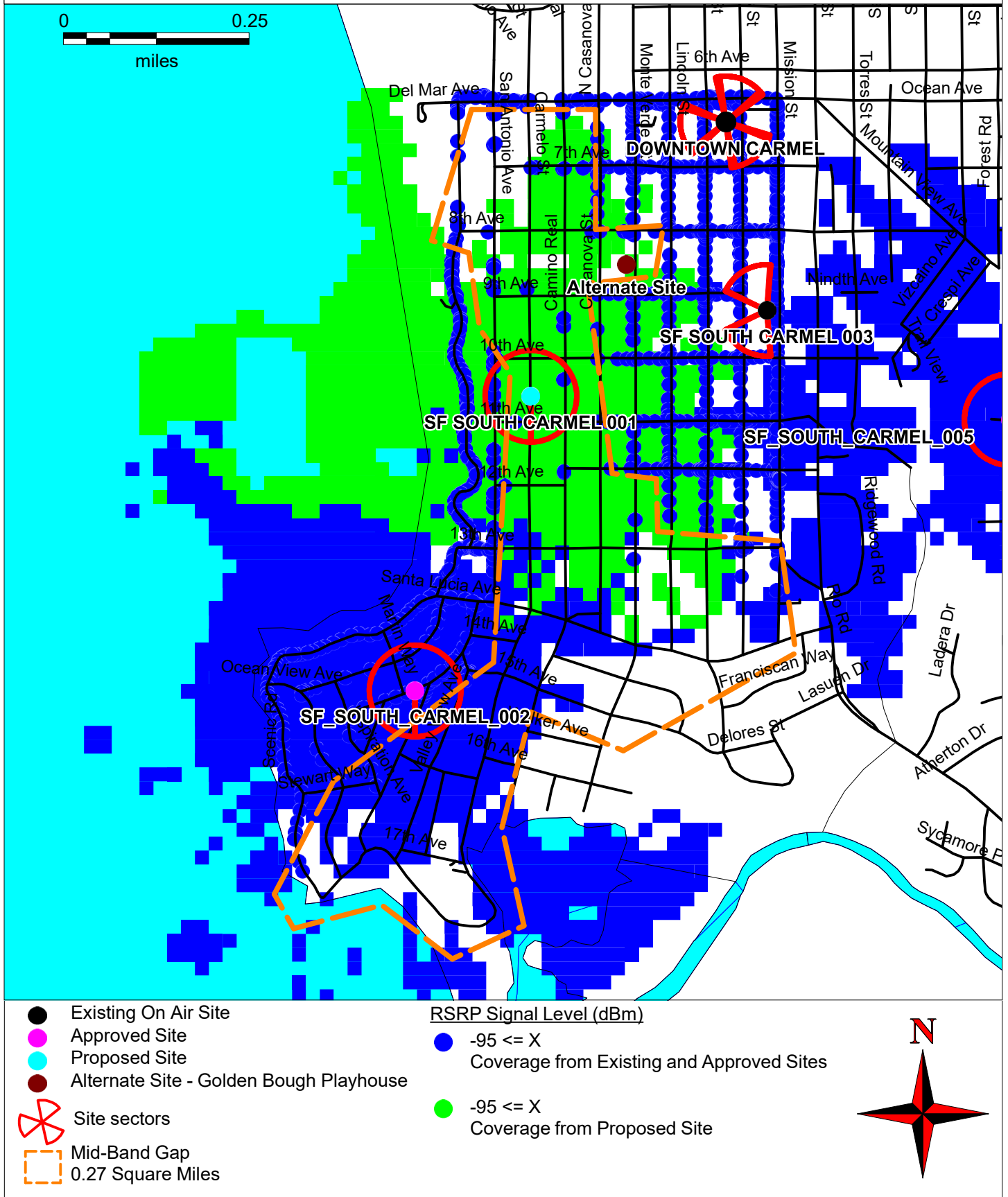


Exhibit L

Verizon's Existing Coverage with Approved and Alternative Coverage – Small Cell

VERIZON WIRELESS

2100 MHz MID BAND - COVERAGE FROM EXISTING, ALTERNATE (SMALL CELL AT 20 FEET AGL), AND APPROVED SITES

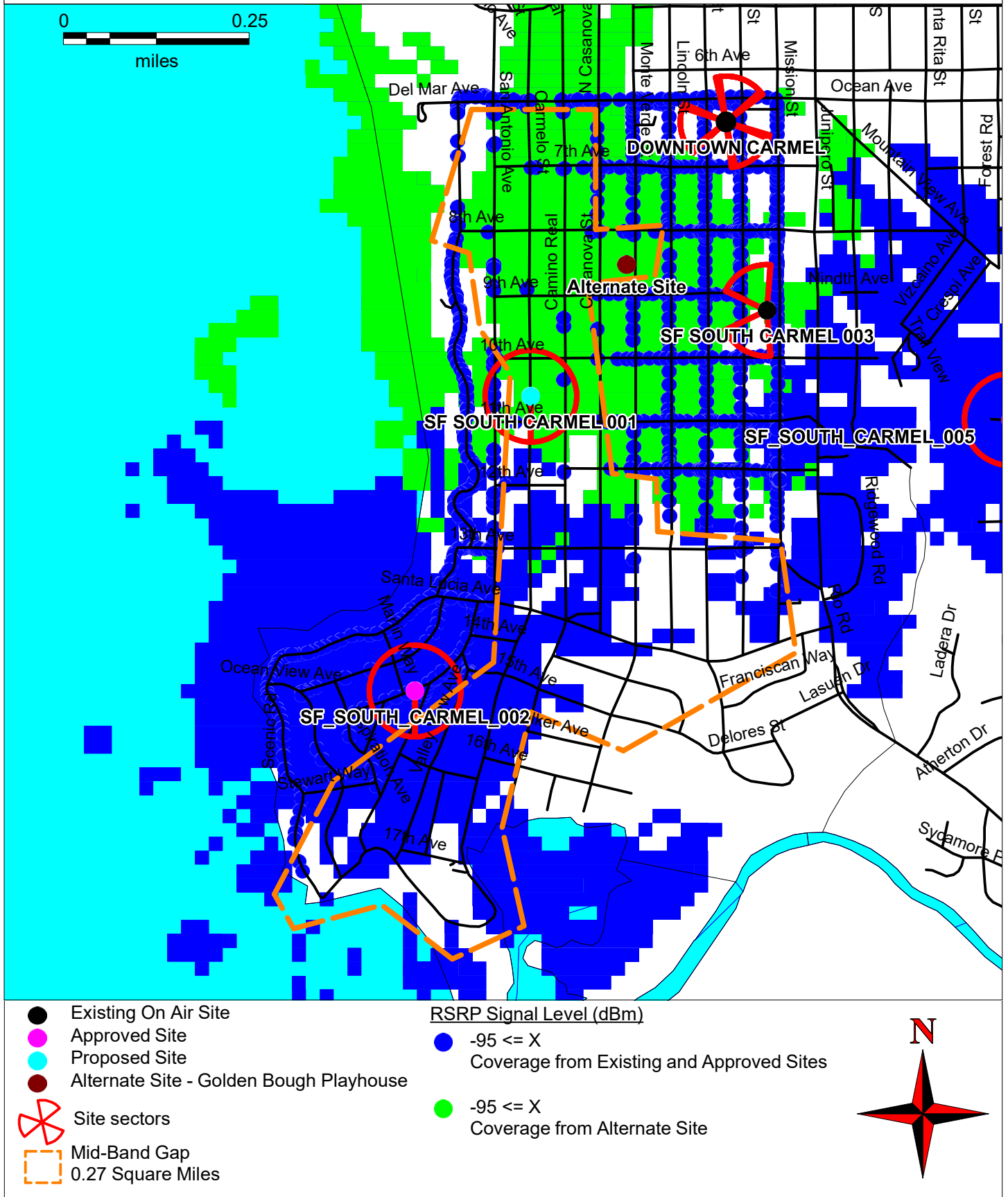


Exhibit M

Verizon's Existing Coverage with Approved and Alternative Coverage - Sectors

VERIZON WIRELESS

2100 MHz MID BAND - COVERAGE FROM EXISTING, ALTERNATE (MACRO SITE AT 20 FEET AGL), AND APPROVED SITES

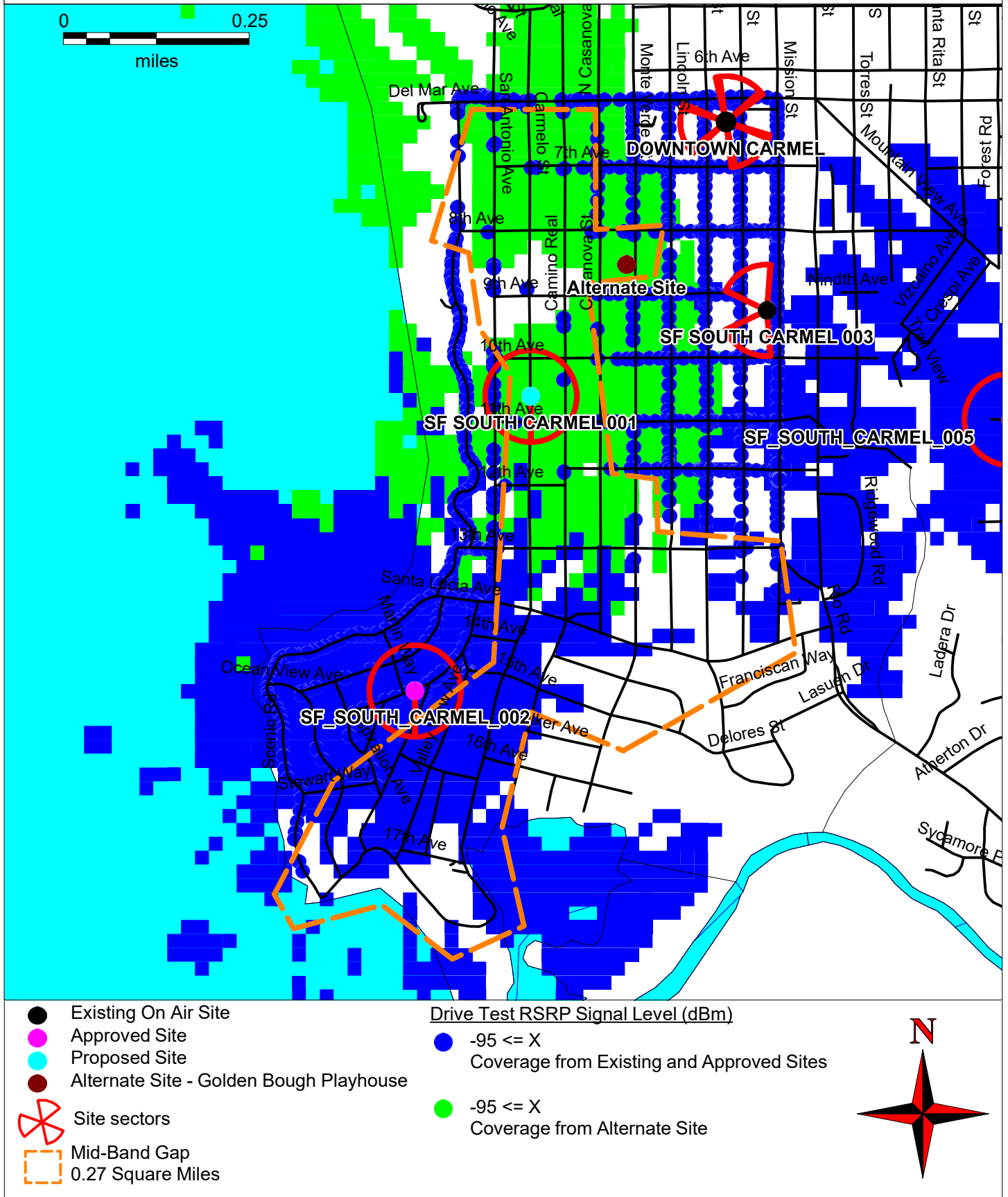


Exhibit M1

Zoning Map with Verizon Sites and Mid Band Gap

VERIZON WIRELESS CARMEL-BY-THE-SEA ZONING MAP WITH VERIZON SITES AND MID BAND GAP

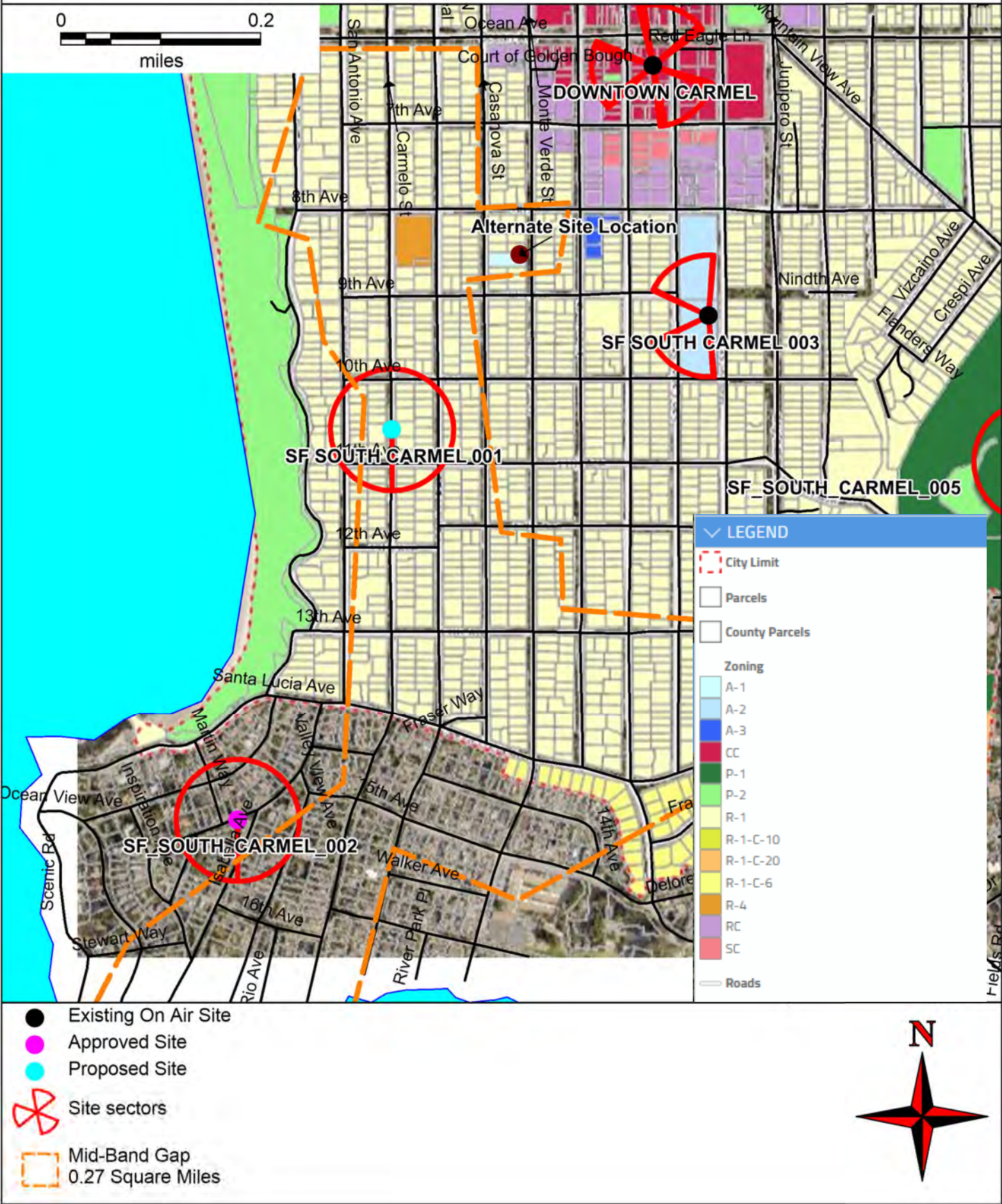
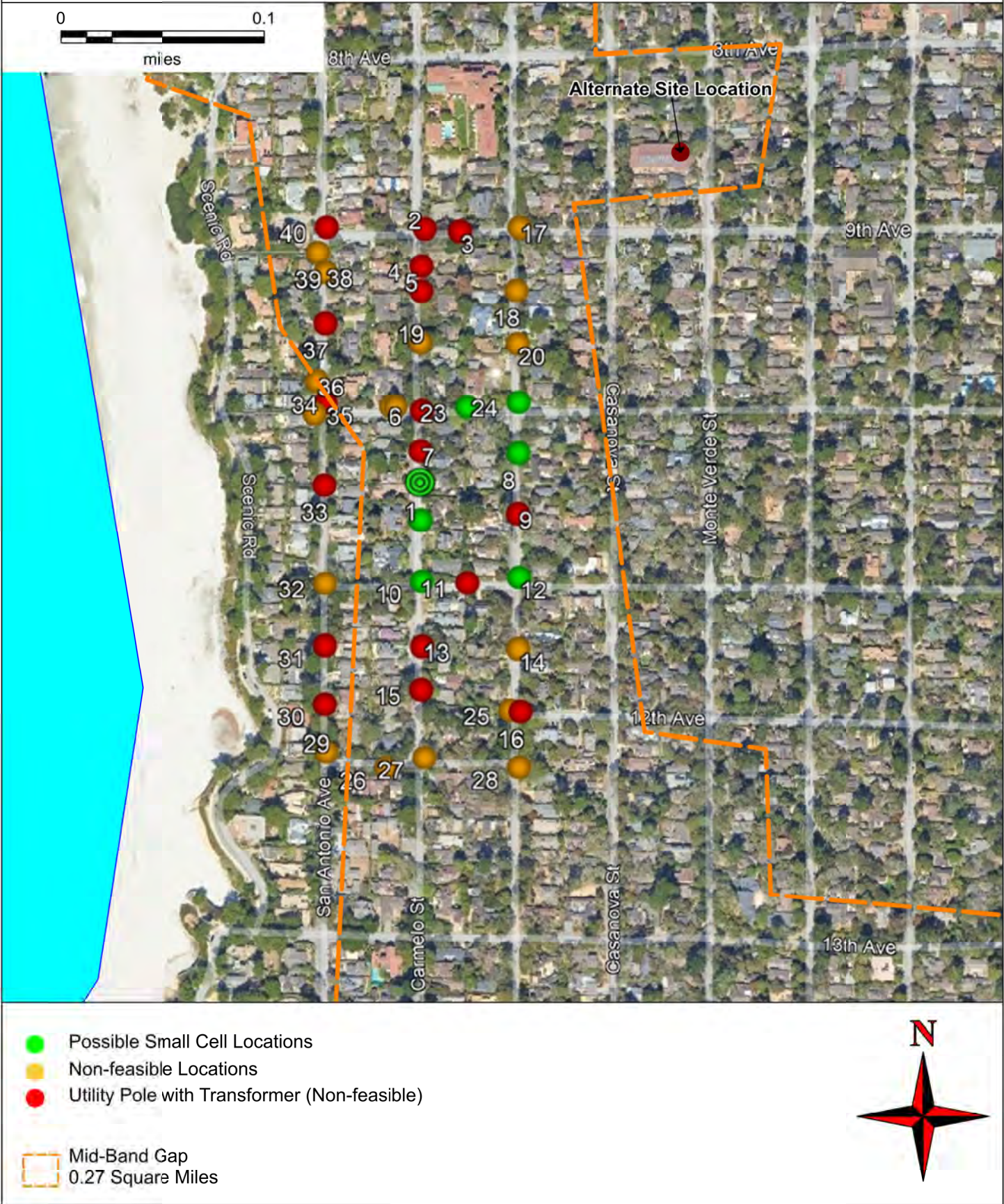


Exhibit M2
Google Earth Image with Utility Pole Locations
and Mid Band Gap Area

VERIZON WIRELESS
GOOGLE EARTH IMAGE WITH UTILITY POLE LOCATIONS
AND MID BAND GAP AREA





Radio Frequency Supplemental Report

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
November 19, 2025

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Introduction

This Supplemental Radio Frequency report is submitted in response to the City of Carmel-by-the-Sea's request for clarification under Section 15.2.2 of the Wireless Application Checklist. It confirms PierCon Solutions' compliance with each element of the City's materially inhibits claim requirements and addresses both radio frequency questions posed by the City. This supplemental report reaffirms that the proposed small wireless facility is technically necessary to introduce new 5G service, including Verizon's licensed C-Band (3700 MHz), densify the network with mid-band coverage, remedy a significant gap in service and ensure Verizon Wireless can operate its licensed network within a fair and balanced regulatory environment.

1. Section 15.2.2 – Materially Inhibits Claim

Section 15.2.2 of the Carmel Wireless Application Checklist (Adopted August 23, 2023) requires applicants asserting a material inhibition claim to provide the following information:

- A street-level map showing the geographic area of service to be densified, improved, or expanded.
- Full-color signal propagation maps, in scale, for all active frequencies with clear signal-level legends.
- A written narrative describing the new or improved services, the area's land use, and potential user impact if unaddressed.
- All drive test results and supporting reports describing methodology.
- An explanation demonstrating how inability to meet the identified goals would materially inhibit the carrier's ability to operate in a fair and balanced regulatory environment.

2. Compliance with Section 15.2.2 Requirements

City Requirement (Section 15.2.2)	PierCon Exhibit(s) and Response Summary
Street-level map of Service Area	Exhibit C2 – Low band SINR map demonstrating .43 square mile service gap. Exhibit D2 - Mid band SINR map demonstrating .39 square mile service gap. Exhibit E - Mid band (3700) RSRP map demonstrating .47 square mile service gap.
Full-color signal propagation maps	Exhibits C, C1, C2, D, D1, D2, and E provide all measured RSRP and SINR drive-test data at street level in accordance with Section 15.2.2 Exhibits K-M – Include before/after coverage maps, existing vs. proposed signal levels, and modeled performance at 2100 MHz mid-band.

	One of the mid-band frequencies necessary for densification.
Written narrative describing new/improved service	Report Section 3 describes the service and performance goals. Noting the need to add new services (3700 MHz), 5G, and densify the network with mid-band service. Provide residential inbuilding service to the area. Report Section 10 describes the improvements made through the use of the proposed small cell.
Drive test data and methodology	Report Section 6 - Provides detailed description of the drive test data and methodology. Report Exhibits - C, C1, C2, D, D1, D2, and E provided demonstrate the results of the drive testing
Explanation of material inhibition (technical impact)	Section 4 of this supplement provides the required explanation of material inhibition, demonstrating how a denial would prevent Verizon from meeting its service and performance objectives consistent with 47 U.S.C. § 332(c)(7)(B)(i)(II).

3. Technical Background and Need for the Proposed Small Cell

PierCon's independent RF engineering analysis (October 14, 2025) demonstrates that Verizon Wireless's existing network in Carmel-by-the-Sea experiences substandard RSRP (< -95 dBm) and SINR (< 10 dB) values, resulting in poor in-building coverage, low throughput (< 5 Mbps), and call-drop rates exceeding 1%. This is evident in both low-band and mid-band frequencies. Verizon's technical approach for improving service to this area is through small cells. This is evident as there is already two approved, but unbuilt small cells (SF South Carmel 002 and 005) which will address only a portion of the residential area. The proposed facility is required as part of Verizon's small cell design to provide continuous reliable mid-band coverage and enable new 5G C-Band service, working in conjunction with the already approved small cells.

Macro sites, as pointed out in the initial RF report (section 3 page 7 paragraph 2), are much more extensive installations as compared to small cells, and are not the method Verizon is using to improve services and provide new services to this dense residential area. Verizon's method is through the deployment of strategically placed small cells. Each small cell provides a small area of coverage and capacity. To provide full coverage to the residential area, a series of small cells must be deployed to serve individual micro-coverage zones while limiting excessive overlap into adjacent sectors. As noted in the RF report, two (2) small cells in the adjacent

residential area have been approved (SF South Carmel 002 and 005), and this is the next in the series of small cells; see Exhibit K. This is Verizon's design for this area.

Section 8, paragraph 3 of the RF report, describes the current small cell design which consists of the two approved small cells (002 and 005) that will serve a portion of the gap, along with the proposed small cell (001) which is geographically placed to work with those two approved small cells and the 57' rooftop identified as SF Carmel 003 (see Exhibit J). Exhibit J demonstrates the location of the Small Cell (001) fits well within the existing and proposed mid-band coverage; i.e. meets the RF engineering geometric grid plan. Exhibit K demonstrates the proposed Small Cell 001 mid-band coverage operates efficiently with the existing and proposed mid-band coverage from SF South Carmel 002 and 005. The purpose of these small cells is to provide mid-band service and capacity (densification) as well as new 5G services and new C-band (3700 MHz frequency band signal).

There is no viable alternative to the small cell SF-001 proposed to be located between 10th and 11th Avenue on Carmelo Street. Macro sites on private property are not an option (refer to Verizon Alternatives Analysis South Carmel Small Cell 001 section IX (B.) for discussion regarding macro sites). Alternate pole locations would need to be near the current proposed small cell pole and as per the Verizon Alternative Analysis South Carmel Small Cell 001 section X (E. & F.) from 27 alternative pole locations 15 were discounted due to infeasibility of use, and another 12 were discounted due to being more intrusive.

Without approval, Verizon cannot densify its network, or introduce new technologies such as 3700 MHz and 5G. Such denial would constitute a material inhibition under the FCC's 2018 Declaratory Ruling (WT Docket 17-79, WC Docket 17-84), which defines effective prohibition as any action that materially inhibits a provider's ability to densify, expand, add new services, or improve its network. As stated in FCC Declaratory Ruling (2018) ¶37, the selection of technology, facility type, spectrum layer, and network architecture is determined by the wireless provider, not the locality. Furthermore, the small cell design is the least intrusive design whereby it blends well with the existing utility pole infrastructure while not impeding any foot-traffic along the right-of-way as all equipment is neatly installed on the pole. See

illustration below for reference:



4. Effect of Denial on Meeting Service and Performance Goals

Verizon Wireless' service and performance objectives for this area are based on its RF design standards, which establish minimum in-building RSRP better than -95 dBm, acceptable SINR for reliable data performance, and median downlink throughput consistent with modern 5G service tiers. Current drive test measurements in the Carmel-by-the-Sea service area show that although low-band signal exists, the network does not meet required performance thresholds, with SINR typically below 10 dB and median throughput generally below 5 Mbps during busy hours.

The proposed facility is required to introduce the mid-band (3.7 GHz) layer that provides the spectral efficiency and bandwidth necessary for Verizon to achieve its identified service and performance goals. Without this facility, the network remains constrained to low-band operation only and cannot meet Verizon's engineering design targets for 5G performance, capacity, or in-building reliability. Low-band coverage alone cannot meet Verizon's 5G design thresholds for throughput, latency, or in-building performance, and therefore does not satisfy the service-level objectives for this area.

From an RF engineering perspective, denial of the application would materially inhibit Verizon's ability to:

- densify the network to meet projected traffic demand;
- utilize its FCC-licensed mid-band spectrum in this service area; and
- implement the layered spectrum architecture required for modern 5G performance.

This conclusion is based solely on measurable RF performance metrics and Verizon's documented service objectives. These RF engineering performance thresholds are applied uniformly across Verizon's national network and form the technical basis for system design, regardless of geographic area. The inhibition described is technical in nature, not a comparison to other carriers: it reflects the inability to implement the required network architecture and spectrum utilization necessary for Verizon to operate its system as designed within the current legal and regulatory framework.

5. Clarification Regarding SF South Carmel 002 and 005

In response to the City's second question regarding approved but unbuilt sites: SF South Carmel 002 and SF South Carmel 005 are listed as approved in the site table and noted on all drive-test exhibits (A through G). They are not yet operational and therefore do not contribute to measured drive or KPI data.

Exhibits J, K, L, and M illustrate modeled future coverage including those approved nodes, identified as follows:

- Exhibit J – Coverage from Existing and Approved Sites
- Exhibit K – Coverage from Existing, Approved, and Proposed (49 ft AGL)
- Exhibit L – Coverage from Existing, Approved, and Alternate (Small Cell 20 ft AGL)
- Exhibit M – Coverage from Existing, Approved, and Alternate (Macro 20 ft AGL)

6. Conclusion

The data and documentation provided by PierCon Solutions satisfy every element of Section 15.2.2. The proposed small wireless facility is technically necessary, the least intrusive means to close the identified gap, and essential for Verizon Wireless to maintain engineered service objectives and lawful use of its licensed spectrum. Denying this application would materially inhibit Verizon's ability to densify, deploy 5G C-Band, and operate in a fair and balanced legal and regulatory environment.

Prepared by:

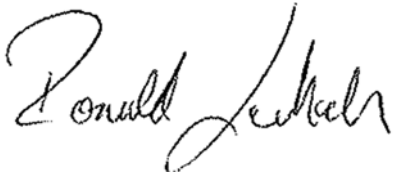


Richard Conroy

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November 19, 2025



Ronald Lukach

Senior RF Engineer

PierCon Solutions, LLC

Date: November 19, 2025



Alternatives Analysis

South Carmel Small Cell 001

**Carmelo Street between 10th Avenue & 11th Avenue
Carmel-by-the-Sea, California**



October 14, 2025

**Summary of Site Evaluations
Conducted by Verizon Wireless**

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I. Executive Summary

To improve network service and fill a gap in service in western Carmel-by-the-Sea, Verizon Wireless proposes to install a small cell wireless facility on a utility pole in the right-of-way of Carmelo Street between 10th and 11th Avenue (the “Proposed Facility”). Verizon Wireless first searched the area for private property and collocation candidates. It found no technically feasible nor available alternative that was more compatible than the Proposed Facility. Verizon Wireless then analyzed 28 potential utility poles in the public right-of-way within the target search area. A map depicting the locations of these utility poles is found on Page 4.

After careful review, Verizon Wireless determined that the Proposed Facility is the least intrusive, technically feasible alternative in the right-of-way to improve network service and fill the significant gap, based on requirements of the Carmel Municipal Code (the “Code”) and *Administrative Wireless Facility Design Guidelines* (the “Guidelines”).

II. Site History

In 2018, Verizon Wireless identified a significant gap in western Carmel-by-the-Sea area. Since then, Verizon Wireless has sought to improve 4G services, fill a gap, and provide new 5G services to the area. Verizon Wireless initially proposed a network of five small cell wireless facilities. Through a series of compromises, litigation, and settlements over nearly a decade, three facilities have been either built or permitted and slated to be built. These accommodations included relocating two facilities outside of the City limits and placing another facility on private property, adversely affecting optimal network design. This application addresses the last remaining site required to complete Verizon Wireless’s original 2018 coverage objective. In addition to filling the previously identified gap, the Proposed Facility will introduce new services, improve existing services, and cure an insufficiency in network capacity.

III. Search Area

The Verizon Wireless network provides limited service in western Carmel. However, due to the exponential growth of mobile devices and increased mobile data traffic across the entire Verizon Wireless network, Verizon Wireless must improve and augment its network. The lack of adequate coverage from existing wireless facilities results in poor service such as poor call quality or inability to access the network altogether.

Verizon Wireless commissioned PierCon Solutions, LLC to conduct a drive test on February 19, 2025, and evaluate its service levels in western Carmel. In an October 2025 report, PierCon determined that the Proposed Facility is required to introduce new services, improve existing services and network capacity, and add 5G service. PierCon also confirmed the gap in Verizon Wireless network coverage and capacity in the area and the lack of a dominant signal. It found inadequate service, particularly in the mid-band frequency range.

Verizon Wireless must install a new facility to ensure reliable network service. PierCon determined that the optimal location for a new facility to improve service and fill the significant gap is an area bounded by 10th Avenue to the north, Camino Real to the east, 11th Avenue to the south, and Carmelo Street to the west. According to PierCon, a

wireless facility in this search area would minimize coverage overlap with existing and approved facilities and maximize the ability to provide new 5G services.

IV. Map of Utility Poles Considered

With these parameters in mind, Verizon Wireless reviewed zoning districts preferred by the Code, potential collocation, and private property locations. Because those options are infeasible, Verizon Wireless analyzed 28 utility poles in the right-of-way in the search area defined by PierCon. The utility pole locations are shown on the following map.



V. Technical Feasibility Considerations

Attachments to utility poles are subject to California Public Utilities Commission (“CPUC”) Rules for Overhead Electric Line Construction, General Order No. 95 (“GO 95”), which imposes strict rules for equipment placement and safe utility worker climbing space. GO 95 includes standards for placement of wireless facility antennas and associated equipment. For example, pole-top antennas and their mounting hardware must be elevated at least six feet above electric conductors. GO 95 Rule 94.4.

Additionally, PG&E has adopted numerous rules for attachments to electric utility poles. For example, PG&E prohibits antennas and communication equipment on utility poles with PG&E distribution equipment such as transformers, line cutouts, and primary risers. *See, e.g., PG&E Installation Details for Service to Pole-Mounted Communication Equipment*, Document 027911 Rev #15, June 30, 2023 (“PG&E Standard 027911”). Verizon Wireless must comply with PG&E’s rules to place wireless equipment on utility poles. Both the CPUC and PG&E rules and regulations have been accounted for in this analysis.

VI. Federal and State Law

The Federal Communications Commission (“FCC”) defines “small wireless facilities” with certain dimension and height thresholds, providing for extension of existing structures up to 50 feet or by 10 percent, whichever greater, as well as new structures up to 50 feet tall or 10 percent taller than adjacent structures. Accessory (non-antenna) equipment is limited to 28 cubic feet. 47 C.F.R. § 1.6002(l).

The FCC determined that a local government’s aesthetic criteria for small cells must be “reasonable,” that is, technically feasible and meant to avoid “out-of-character” deployments, and also “published in advance.” *See Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, 33 FCC Rcd. 9088, ¶¶ 86-88 (September 27, 2018). The FCC also found that local regulations that “materially inhibit” service improvements constitute a prohibition of service that violates the federal Telecommunications Act. *Id.*, ¶ 37; *see also* 47 U.S.C. §§ 253(a), 332(c)(7)(B)(i)(II).

California Public Utilities Code Section 7901 grants telephone corporations a statewide right to place their telephone equipment along any public right-of-way.

VII. Carmel Municipal Code

A. Location Preferences

The Code imposes ranked location preferences as follows, ordered most-favored to least-favored:

- CC and SC commercial zones, A-2 cultural zone (Tier III)
- P-2 and P-1 parkland zones, A-1 theatrical zone (Tier II)
- R-1, R-4, and RC residential zones, A-3 senior citizen facility zone (Tier I)

Applicants proposing facilities in the Tier I and II locations must show that no locations in a Tier III location are technically feasible and available. Code § 17.46.040(B).

The Code considers locations in the right-of-way of the R-1 single-family residential district to be highly incompatible locations, requiring a special exception request and special findings. Code §§ 17.46.040(E)(1), 17.46.080(C).

The Code prefers placement on public/private parcels over the right-of-way. Code § 17.46.040(C). However, that preference is preempted by California Public Utilities Code Section 7901, which grants telephone corporations such as Verizon Wireless a statewide franchise right to place their equipment along any right-of-way. In any event, placement of a wireless facility on a private single-family residential property is infeasible in the search area due to the Code's height and setback requirements, as discussed in Section IX(B) below.

Furthermore, requiring a wireless carrier to place a wireless facility on private property rather than in the right-of-way would unnecessarily require that carrier to incur the cost associated with the delay and expense of finding a willing landlord, if one exists. Even if a landlord was identified, the carrier would again incur costs associated with the delay and expense associated with negotiating a lease, as well as ongoing costly rental payments and restrictive terms not required for the right-of-way. The additional delay, expense, and burdens of a lease would "materially inhibit" service improvements in violation of the Telecommunications Act. In contrast, Verizon Wireless can attach its equipment to utility poles as a member of the Northern California Joint Pole Association ("JPA"), with lower deployment costs and an established, expedited approval process.

B. Structure Preferences

In the right-of-way, existing/replacement structures are preferred over new structures of any type. Code § 17.46.040(D)(2).

C. Design Standards and Exceptions

Both the Code and Guidelines impose numerous design standards, special considerations, and other preferences, which express the City's values related to aesthetics. The Code requires approval of an exception for certain standards not met by a proposed wireless facility. The exception findings require an applicant to prove that that denial of a

proposed facility would constitute a prohibition of service or otherwise violate federal or state law. Code § 17.46.080(C)(2). The more exceptions required, the more intrusive a proposed or alternative location.

VIII. Evaluation of Preferred Zones

Verizon Wireless first considered locations in zones preferred according to the Code, as follows. The preferred zones are all northeast or east beyond the significant gap area and are infeasible for a new small cell.

Tier III Locations (Preferred). Per the Code, applicants proposing a Tier I or II location must show that no Tier III location is technically feasible or available. Verizon Wireless reviewed the Tier III zones as follows.

CC. The closest location is 0.4 miles northeast of the Proposed Facility, and only 400 feet southwest of the Verizon Wireless's existing Downtown Carmel facility. A wireless facility here would duplicate the coverage of that facility.

SC. The closest location is 0.35 miles northeast of the Proposed Facility, and only 580 feet southwest of the Downtown Carmel facility. A wireless facility here would duplicate the coverage of that facility.

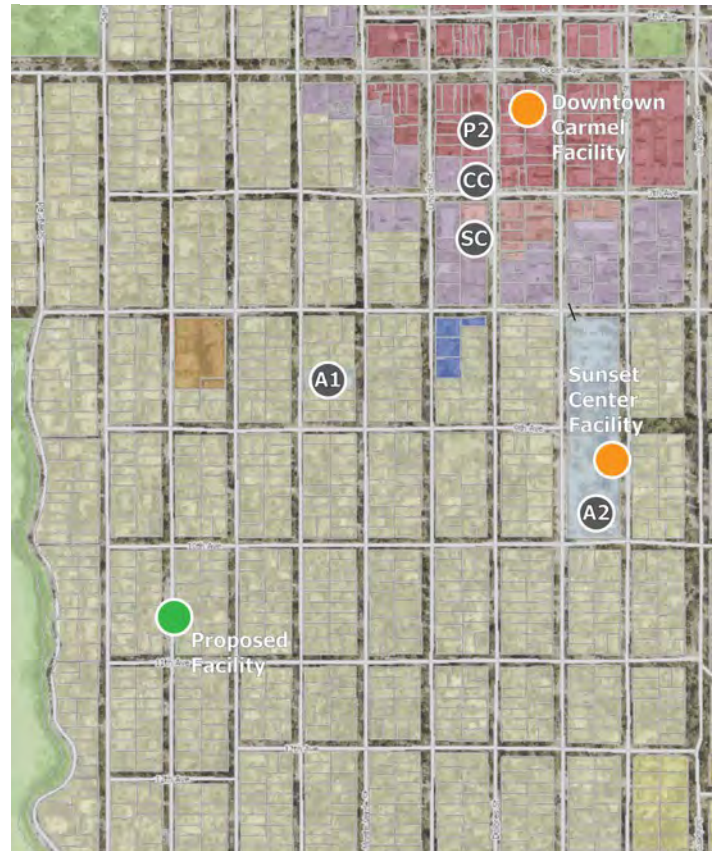
A-2. The closest location is 0.3 miles east of the Proposed Facility. This zone is the location of Verizon Wireless's Sunset Center facility. A wireless facility here would duplicate part of the coverage of that facility.

Tier II Locations. Verizon Wireless also considered Tier II zones, though the Code does not require a showing that these are infeasible.

P-1. The closest location is 0.5 miles east of the Proposed Facility, the Mission Trail Nature Preserve. This is even farther east than Verizon Wireless's Sunset Center facility, which cannot serve the significant gap in service in western Carmel. A wireless facility in the more distant P-1 zone likewise could not serve the gap. Additionally, Verizon Wireless has already planned a small cell facility in unincorporated Monterey County east of this zone.

P-2. The closest location is 0.4 miles northeast of the Proposed Facility, and only 170 feet west of the Downtown Carmel facility. A wireless facility here would duplicate the coverage of that facility.

Preferred Zones Closest to Proposed Facility



A-1. The closest A-1 zone is 0.2 miles northeast of the Proposed Facility, the Golden Bough Playhouse property. The Golden Bough property is beyond the search area. A rooftop or tower facility on this private property would be limited to 34 feet in height. Code §§ 17.10.030(B), 17.18.100, 17.46.040(F)(1)(b), Guidelines § I(B)(2). At 15 feet less than the Proposed Facility height, a 34-foot facility would provide much less coverage and could not serve the gap. Located 0.25 miles southwest of Verizon Wireless's existing Downtown Carmel facility, a wireless facility here would duplicate some of the coverage of that facility. The area east along Monte Verde Street in front of the Playhouse is private property, not right-of-way, and lacks utility poles.

Due west of the Golden Bough Playhouse, the two existing utility poles in the A-1 zone along Casanova Street, shown in the photographs below, are both infeasible and unavailable due to primary risers and a transformer that preclude installation of a wireless facility per PG&E rules. As described above, a new stand-alone pole next to the Golden Bough Playhouse would be more intrusive than the Proposed Facility, because a new structure is the least-preferred structure option in the right-of-way.

*Infeasible Utility Poles in A-1 Zone
Behind Golden Bough Playhouse, Casanova Street*



Lacking feasible alternatives in preferred zones, Verizon Wireless examined rights-of-way in the search area within the Tier I R-1 zone.

IX. Evaluation of Collocation and Private Property

A. Collocation

Verizon Wireless first looked for opportunities for collocation, as encouraged by the Code. Code § 17.46.040(F)(1)(k). It found no viable options in the search area. The only existing wireless facilities sites nearby are on rooftops that already support Verizon Wireless facilities: the Downtown Carmel facility and Node 003 on Sunset Center. As explained in the PierCon report, those facilities do not serve the gap.

B. Macro Facility or Small Cell Facility on Private Property

Verizon Wireless could not identify a viable larger “macro” facility alternative to serve the gap. Macro facilities generally require too large of a footprint to be in the public right-of-way. A macro facility would need to be installed on private property in the search area, where the only structures are single-family homes. The Code and Guidelines render a facility on private property to be technically infeasible for several reasons.

First, it is highly unusual to place a wireless facility on rooftops of private homes, or on a new tower adjacent to a home, especially in a jurisdiction such as Carmel where the lot sizes are relatively small and the homes are close together. A wireless facility also requires a secure, fenced lease area in which macro wireless towers are typically placed along with equipment cabinets and other network gear, with space for safe worker access and maintenance.

The Code and Guidelines limit wireless facilities on private property to 10 feet over the zone height limit, which is 24 feet in the surrounding R-1 zone, allowing a total facility height of only 34 feet. Code §§ 17.10.030(B), 17.46.040(F)(1)(b), Guidelines § I(B)(2). At 15 feet less than the Proposed Facility height, a 34-foot tower or rooftop facility would provide much less coverage and could not serve the gap. A 50-foot facility on private property would require a special exception for additional height.

Furthermore, a proposed wireless facility on an R-1 parcel could not satisfy the Code’s setback requirements. The Guidelines require a setback of at least 110% of the height of the tower from habitable structures approved for residential occupancy. Guidelines § I(A)(2). Additionally, the R-1 zone front/rear setbacks range between 10 to 15 feet and the side yard setbacks between 3 to 9 feet, depending on lot characteristics such as interior site, corner site, or street side. Code § 17.10.030(A), Guidelines § I(A)(3). A tower setback less than 110% would require a special exception.

Alone or in combination, these restrictive setbacks would not accommodate a tower and its surrounding equipment area on the residential properties in or around the search area. For example, a wireless facility would need to be at least 15 feet from a parcel line, with the tower 55 feet from a home, requiring at least 70 feet of available space.

The properties in the vicinity around the search area include residences that are generally significantly less than 55 feet from property lines, as shown on the map to the right. These parcels are plainly not large enough to accommodate both the R-1 zone setback and the 110% tower setback.

Finally, fiber and power would need to be supplied to a facility on private property by trenching underground to the nearest points of connection in the public right-of-way. Guidelines § 1(A)(5).

These same factors would apply to a proposed small cell facility on private property.

In contrast, wireless facilities are permitted on utility poles in the public right-of-way by both the Code and State Law. Existing utility poles in the right-of-way are generally taller than residential homes. The Proposed Facility complies with the City's height limit for right-of-way facilities, because it does not exceed the height of the replaced pole by more than 10 feet, and does not require a special exception. Code § 17.46.040(F)(1)(b).

The Code does not require any setbacks for wireless facilities in the right-of-way. The Proposed Facility does not require any underground trenching because the subject utility pole will support electric and communications lines.

If located in the Carmel right-of-way, wireless facilities can serve a larger area due to greater allowed height, and fewer facilities would be required.



X. Evaluation of Utility Poles in the Right-of-Way

A. Preferred Option – Small Cell on an Existing Utility Pole

Verizon Wireless radio frequency design engineers determined that a small cell wireless facility is the best facility design due to the location, size, and nature of the significant gap area as well as the community characteristics. “Small wireless facility” is defined with certain height and dimension thresholds, according to the FCC rules described in Section VI.

Verizon Wireless analyzed solutions that utilize existing infrastructure locations, minimizing any impacts associated with the wireless facility. The gap area includes numerous existing utility poles in the public right-of-way that support PG&E electric equipment and communications lines, where small cell wireless facilities can be installed. State law grants telephone corporations, including wireless carriers, the right to place their equipment along any public right-of-way. Verizon Wireless accesses utility poles as a member of the JPA, which is composed of various electric and communication utilities that share utility poles. In addition to using infrastructure already present in the public right-of-way, the utility poles support PG&E lines, which already provide electricity, minimizing trenching associated with a wireless project (none is required for the Proposed Facility).

As discussed above, the Proposed Facility is a small piece of a larger network in the area. The network includes existing small cell wireless facilities as well as small cells that have been approved but not yet constructed. The Proposed Facility must be strategically located to compliment and not interfere with the service provided by existing and approved wireless facilities.

B. Least Compatible Option – New Stand-Alone Pole

Given the presence of existing utility poles throughout the search area and the City’s preference for collocation, a new stand-alone pole in the public right-of-way would be more intrusive than adding wireless equipment to an existing utility pole. Code § 17.46.040(D)(2) (“New (nonreplacement) structures of any type (pole or nonpole) are the least compatible structures to use on public rights-of-way. Existing (or replacement) utility poles are the most compatible structures.”).

C. Summary of Site-Specific Evaluation

Verizon Wireless evaluated 28 utility poles within the search area defined by PierCon. Verizon Wireless determined that the Proposed Facility pole on Carmelo Street between 10th Avenue and 11th Avenue is the least intrusive, feasible alternative to improve service and fill the significant gap (Alternative 1). 15 poles were determined to be infeasible, primarily due to PG&E rules (Alternatives 2-16). 12 poles were determined to be more intrusive because they would require more exceptions or special considerations under the Code, or they exhibit other disfavored site characteristics, as established by the Code, such as excessive height, removal of existing landscape, and elimination of street parking (Alternatives 17-28).

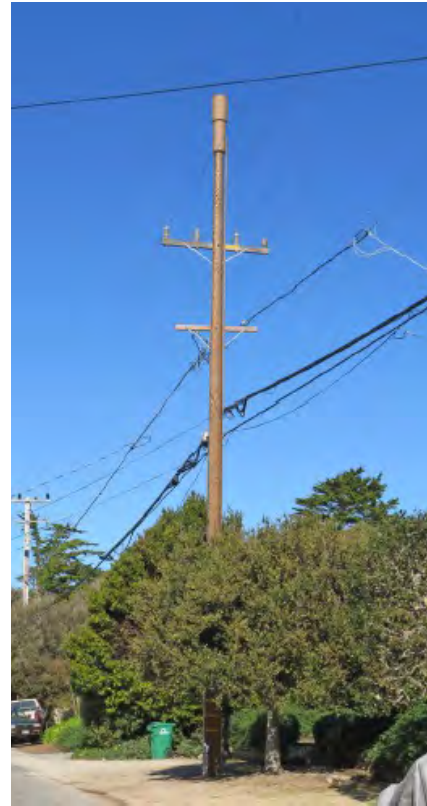
D. Proposed Facility (Alternative 1)

**1. Carmelo Street North of 11th Avenue
36.549322°, -121.926925° (R-1 zone)**

Verizon Wireless can replace this 38-foot 11-inch utility pole with a taller pole supporting a 2.5-foot-tall cylindrical pole-top antenna, for a total height of 49 feet 10 inches. Associated network equipment would be placed on the side of the pole between 7 and 17 feet, including radios and power supply units concealed within a narrow shroud as well as an electric meter/disconnect switch. A photosimulation appears to the right.

The Proposed Facility requires the two exceptions listed below, fewer than any other alternative. This is the least intrusive, feasible alternative to improve Verizon Wireless service in western Carmel.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)



E. Poles Discounted Due to Infeasibility (Alternatives 2-16)

2. Carmelo Street at 9th Avenue
36.5513758012°, -121.92692698° (R-1 zone)

This utility pole supports a transformer and line cutouts. PG&E prohibits wireless equipment on a utility pole with such distribution equipment. PG&E Standard 027911, §5. This pole is technically infeasible.



3. 9th Avenue East of Carmelo Street
36.5513672161, -121.926579151° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



4. Carmelo Street South of 9th Avenue
36.5511228965°, -121.926927495° (R-1 zone)

This utility pole supports three transformers. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



5. Carmelo Street South of 9th Avenue
36.5509104235°, -121.926923861° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



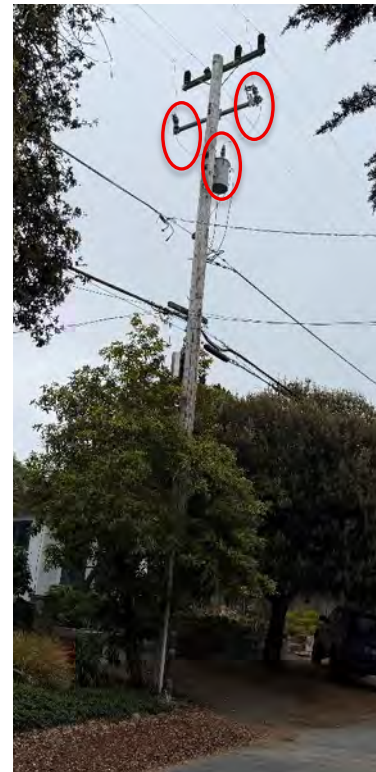
6. Carmelo Street at 10th Avenue
36.5501477909°, -121.926921786° (R-1 zone)

This utility pole supports a transformer and line cutouts, along with numerous conduits and risers. An antenna cannot be placed on a utility pole with such distribution equipment per PG&E rules. PG&E Standard 027911, §5. This pole is technically infeasible.



7. Carmelo Street South of 10th Avenue
36.5497875003°, -121.92692919° (R-1 zone)

This utility pole supports a transformer and line cutouts. An antenna cannot be placed on a utility pole with such distribution equipment per PG&E rules. PG&E Standard 027911, §5. This pole is technically infeasible.



8. Camino Real South of 10th Avenue
36.5497910094°, -121.926070174° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



9. Camino Real South of 10th Avenue
36.5493466957°, -121.92607197° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



10. Carmelo Street at 11th Avenue
36.5488957352°, -121.926925005° (R-1 zone)

This utility pole supports primary line cutouts. An antenna cannot be placed on a utility pole with such distribution equipment per PG&E rules. PG&E Standard 027911, §5. There are also several communication boxes, which already occupy space on the side of the pole, limiting climbing space and occupying the space available for equipment on the pole. PG&E Standard 027911, §§16A-B, 25. This pole is technically infeasible.



11. 11th Avenue East of Carmelo Street
36.5488966718°, -121.926555923° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



12. Camino Real at 11th Avenue
36.5489094311°, -121.926063821° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



13. Carmelo Street South of 11th Avenue
36.5484285316°, -121.926924351° (R-1 zone)

This utility pole supports a transformer and line cutouts. An antenna cannot be placed on a utility pole with such distribution equipment per PG&E rules. PG&E Standard 027911, §5. This pole is technically infeasible.



14. Camino Real South of 11th Avenue
36.5484408592°, -121.926069457° (R-1 zone)

There are numerous conduit stub-ups at the base of this utility pole as well as cable risers on the rear and side of the pole. The stub-ups contain cables that run up the pole and occupy the space where the equipment would be located, rendering that space unavailable. The wireless equipment would have to be installed streetside and not block climbing space, which would violate PG&E's rules. GO 95, Rule 93; PG&E Standard 027911, §16A, C. The power riser also occupies the 9-12 quadrant, which makes it unavailable. *Id.* This is not a feasible alternative.



15. Carmelo Street North of 12th Avenue
36.5481124343°, -121.926921994° (R-1 zone)

This utility pole supports a transformer and line cutouts. An antenna cannot be placed on a utility pole with such distribution equipment per PG&E rules. PG&E Standard 027911, §5. This pole is technically infeasible.



16. Camino Real at 12th Avenue
36.5480078375, -121.926056812° (R-1 zone)

This utility pole supports a transformer. PG&E prohibits wireless equipment on utility poles with transformers. PG&E Standard 027911, §5. This pole is technically infeasible.



F. Poles Discounted as More Intrusive (Alternatives 17-28)

17. Camino Real at 9th Avenue

36.5513838458°, -121.926071779° (R-1 zone)

This pole is on a roadway with no curb, making it difficult to comply with PG&E’s metering requirements related to the safety of its employees. 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 it would not meet PG&E requirements, 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, a wireless facility on this utility pole 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.



In contrast, the Proposed Facility would include all required equipment on the pole and no bollards. This location would also require the eight exceptions or special considerations listed below, six more than the Proposed Facility. This is alternative is more intrusive than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)
- Adversely affects normal drainage of surface water, Code § 17.46.040(E)(3)(b)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)

**18. Camino Real South of 9th Avenue
36.5509102607°, -121.926082459° (R-1 zone)**

This location would require the 15 exceptions or special considerations listed below, 13 more than the Proposed Facility. There are no adjacent trees to screen a wireless facility so views could potentially be obstructed. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Replacement pole not as close to the removed pole's location as possible, Guidelines § II(A)(1)(1)
- Not aligned with other existing poles along public right-of-way, Guidelines § II(A)(1)(2)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Pole-mounted accessory equipment oriented toward prominent views, Guidelines § II(C)(3)(a)
- Extends over any roadway for vehicular travel, any pedestrian path of travel, or any abutting private property, Guidelines § II(C)(3)(c)



**19. Carmelo Street North of 10th Avenue
36.5505702698°, -121.926928081° (R-1 zone)**

This pole is on a roadway with no curb, making it difficult to comply with PG&E's metering requirements related to the safety of its employees. 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 it would not meet PG&E requirements, 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. 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, a wireless facility on this utility pole 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.



In contrast, the Proposed Facility would include all required equipment on the pole and no bollards. This location would require the seven exceptions or special considerations listed below, five more than the Proposed Facility. This alternative is more intrusive than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects vehicular/pedestrian traffic or parking, Code § 17.46.040(E)(3)(c)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)

20. Camino Real North of 10th Avenue
36.5505221883°, -121.926073091° (R-1 zone)

This location would require the nine exceptions or special considerations listed below, seven more than the Proposed Facility. There are no adjacent trees to screen a wireless facility so views could potentially be obstructed. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)
- Adversely affects vehicular/pedestrian traffic or parking, Code § 17.46.040(E)(3)(c)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Extends over any roadway for vehicular travel, any pedestrian path of travel, or any abutting private property, Guidelines § II(C)(3)(c)



21. 10th Avenue West of Carmelo Street
36.5501076964°, -121.927209896° (R-1 zone)

The PG&E replacement pole required to place a wireless facility at this location would result in an overall ten-foot height increase compared to the existing pole. This height increase could be considered an obstruction or clutter depending on the vantage point. Additionally, this location would require the 12 exceptions or special considerations listed below, ten more than the Proposed Facility. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Overall height exceeds height of the existing pole by more than 10 feet, Code § 17.46.040(F)(1)(b)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)



22. 10th Avenue West of Carmelo Street
36.5501093609°, -121.927167035° (R-1 zone)

The PG&E replacement pole required to place a wireless facility at this location would result in an overall ten-foot height increase compared to the existing pole. This height increase could be considered an obstruction or clutter depending on the vantage point. Additionally, this location would require the 12 exceptions or special considerations listed below, ten more than the Proposed Facility. This is a more intrusive alternative than the Proposed Facility.



- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Overall height exceeds height of the existing pole by more than 10 feet, Code § 17.46.040(F)(1)(b)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)

**23. 10th Avenue East of Carmelo Street
36.5501351381°, -121.926555448° (R-1 zone)**

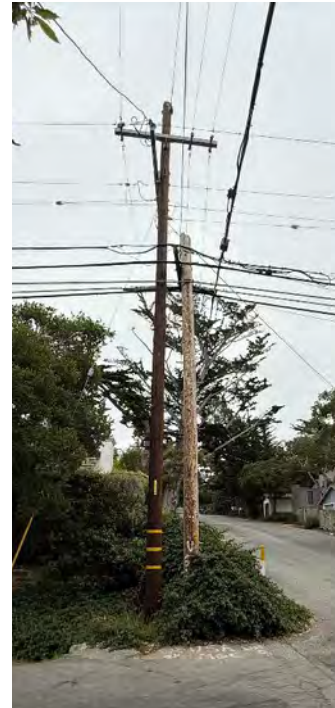
This location would require the 12 exceptions or special considerations listed below, ten more than the Proposed Facility. There are no adjacent trees to screen a wireless facility so views could potentially be obstructed. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of door or window of residence, Code § 17.46.040(E)(2)(a)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Pole-mounted accessory equipment oriented toward prominent views, Guidelines § II(C)(3)(a)
- Extends over any roadway for vehicular travel, any pedestrian path of travel, or any abutting private property, Guidelines § II(C)(3)(c)



24. Camino Real and 10th Avenue
36.5501316789°, -121.926070976° (R-1 zone)

This pole is on a roadway with no curb, making it difficult to comply with PG&E's metering requirements related to the safety of its employees. 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 it would not meet PG&E requirements, 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. 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, a wireless facility on this utility pole 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.



In contrast, the Proposed Facility would include all required equipment on the pole and no bollards. This location would require the 13 exceptions or special considerations listed below, eleven more than the Proposed Facility. This alternative is more intrusive than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects normal drainage of surface water, Code § 17.46.040(E)(3)(b)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Pole-mounted accessory equipment oriented toward prominent views, Guidelines § II(C)(3)(a)
- Antennas placed on the pole in a way that significantly impairs public or private views,

Guidelines § II(B)(1)

- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)

25. Camino Real North of 12th Avenue
36.5480085503°, -121.926180926° (R-1 zone)

This location would require the ten exceptions or special considerations listed below, eight more than the Proposed Facility. There are no adjacent trees to screen a wireless facility so views could potentially be obstructed. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Not aligned with other existing poles along public right-of-way, Guidelines § II(A)(1)(2)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)



26. 12th Avenue West of Carmelo Street
36.547552135°, -121.927233821° (R-1 zone)

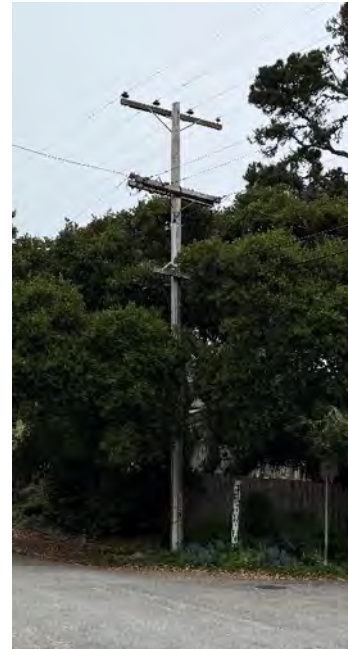
This location would require the 14 exceptions or special considerations listed below, 12 more than the Proposed Facility. There are no adjacent trees to screen a wireless facility so views could potentially be obstructed. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- In front of area five feet in either direction from centerline of residential door or window, Code § 17.46.040(E)(2)(a)
- Adversely affects vehicular/pedestrian traffic or parking, Code § 17.46.040(E)(3)(c)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Location or design obstructs significant coastal views from public right-of-way, Code § 17.46.040(F)(1)(k)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Not aligned with other existing poles along public right-of-way, Guidelines § II(A)(1)(2)
- Not designed to resemble existing poles, including an overall height that is greater than 10 feet taller than the replaced pole, or the additional height necessary to comply with CPUC safety standards such as General Order 95, Guidelines § II(A)(1)(3)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Pole-mounted accessory equipment oriented toward prominent views, Guidelines § II(C)(3)(a)
- Extends over any roadway for vehicular travel, any pedestrian path of travel, or any abutting private property, Guidelines § II(C)(3)(c)



27. Carmelo Street at 12th Avenue
36.5476580885°, -121.926920897° (R-1 zone)

This pole is on a roadway with no curb, making it difficult to comply with PG&E's metering requirements related to the safety of its employees. 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 it would not meet PG&E requirements, 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. 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, a wireless facility on this utility pole 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.



In contrast, the Proposed Facility would include all required equipment on the pole and no bollards. This location would require the 10 exceptions or special considerations listed below, eight more than the Proposed Facility. This alternative is more intrusive than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects normal drainage of surface water, Code § 17.46.040(E)(3)(b)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Antennas placed on the pole in a way that significantly impairs public or private views, Guidelines § II(B)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)
- Pole-mounted accessory equipment oriented toward prominent views, Guidelines § II(C)(3)(a)

28. Camino Real at 12th Avenue
36.5475834924°, -121.926059818° (R-1 zone)

This location would require the nine exceptions or special considerations listed below, seven more than the Proposed Facility. The adjacent mature tree would have to be significantly trimmed, which would affect the view. This is a more intrusive alternative than the Proposed Facility.

- Right-of-way in single-family residential zone, Code § 17.46.040(E)(1)
- Adversely affects tree roots or reduce greenbelt area, Code § 17.46.040(E)(3)(d)
- Displaces any existing tree or landscape and/or hardscape features, Code § 17.46.040(F)(1)(f)
- Fails to maintain existing native vegetation to the maximum extent feasible, Code § 17.46.040(F)(1)(f)
- Obstructs views enjoyed by neighboring parcels and/or presents excess visual mass or bulk to public view or to adjoining properties, Code § 17.46.040(F)(1)(k)
- Creates visual clutter or negatively affects important public or private views, Code § 17.46.040(F)(1)(k)
- Substantially eliminates an existing significant view enjoyed on another parcel, Code § 17.46.040(F)(1)(k)
- Replacement pole not as close to the removed pole's location as possible, Guidelines § II(A)(1)(1)
- More intrusive and incompatible aesthetic design, Guidelines § II(B)(1)



XI. Conclusion

Verizon Wireless has considered preferred zones, collocations, private property, and 28 specific alternatives in the right-of-way to improve its service and fill the significant gap in western Carmel. Based upon the values expressed in the Carmel-by-the-Sea Municipal Code, the Proposed Facility clearly constitutes the least intrusive feasible location for Verizon Wireless's new facility.

RADIO FREQUENCY ELECTROMAGNETIC ENERGY EXPOSURE REPORT**PRE-Activation****Prepared for Verizon****Site Name:** SF SOUTH CARMEL 001**Site Num:** 428216_5000081318**Site Type:** Utility Pole**Located at:**

IFO Carmelo St, 4 South East of 10th Ave
Carmel by the Sea, CA 93921
Latitude: 36.549322 / Longitude: -121.926922

Report Date: 11/13/2024**Report By:** Jamie Santos, RF Engineer

**Based on FCC Rules and Regulations, Verizon will be compliant
provided recommendation(s) are implemented.**

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1.0 EXECUTIVE SUMMARY

Dtech Communications, LLC (“Dtech”) has been retained by Verizon, care of Sequoia, to determine whether its wireless communications facility complies with the Federal Communications Commission (FCC) Radio Frequency (RF) Safety Guidelines. This report contains a PRE-activation, computer-simulated analysis of the Electromagnetic Energy (EME) exposure resulting from the facility. The cumulative analysis includes contributions from existing wireless carriers on site, where applicable and information is provided. Results are compared to FCC’s General Population (GP) Maximum Permissible Exposure (MPE) Limits. The tables below summarize the results of our EME assessment at a glance:

EME Summary

Analyzed Elevation(s)	Height Above Ground Level (ft AGL)	Results (% GP)	Status
Ground	0	0.4	Pass
Adjacent Bldg Roof	20	13	Pass
Antenna Level	47.4	3083	see Page 8

2.0 SITE DESCRIPTION

The wireless telecommunication facility is located on the ground. The facility consists of 1 wireless carrier(s) or operator(s): Verizon. The antennas are typically grouped into sectors pointing in different directions to achieve the desired areas of coverage. Verizon’s antennas are mounted on a wooden utility pole.

2.1 Site Map



2.2 Antenna Inventory

The table below reflects the technical specifications provided by our clients and/or gathered from physical field surveys where applicable. This final configuration, including power settings and antenna orientations must be maintained to remain in compliance with FCC guidelines. For co-locators or nearby transmitters, conservative estimates are used for purposes of a cumulative study where information is not provided or available.

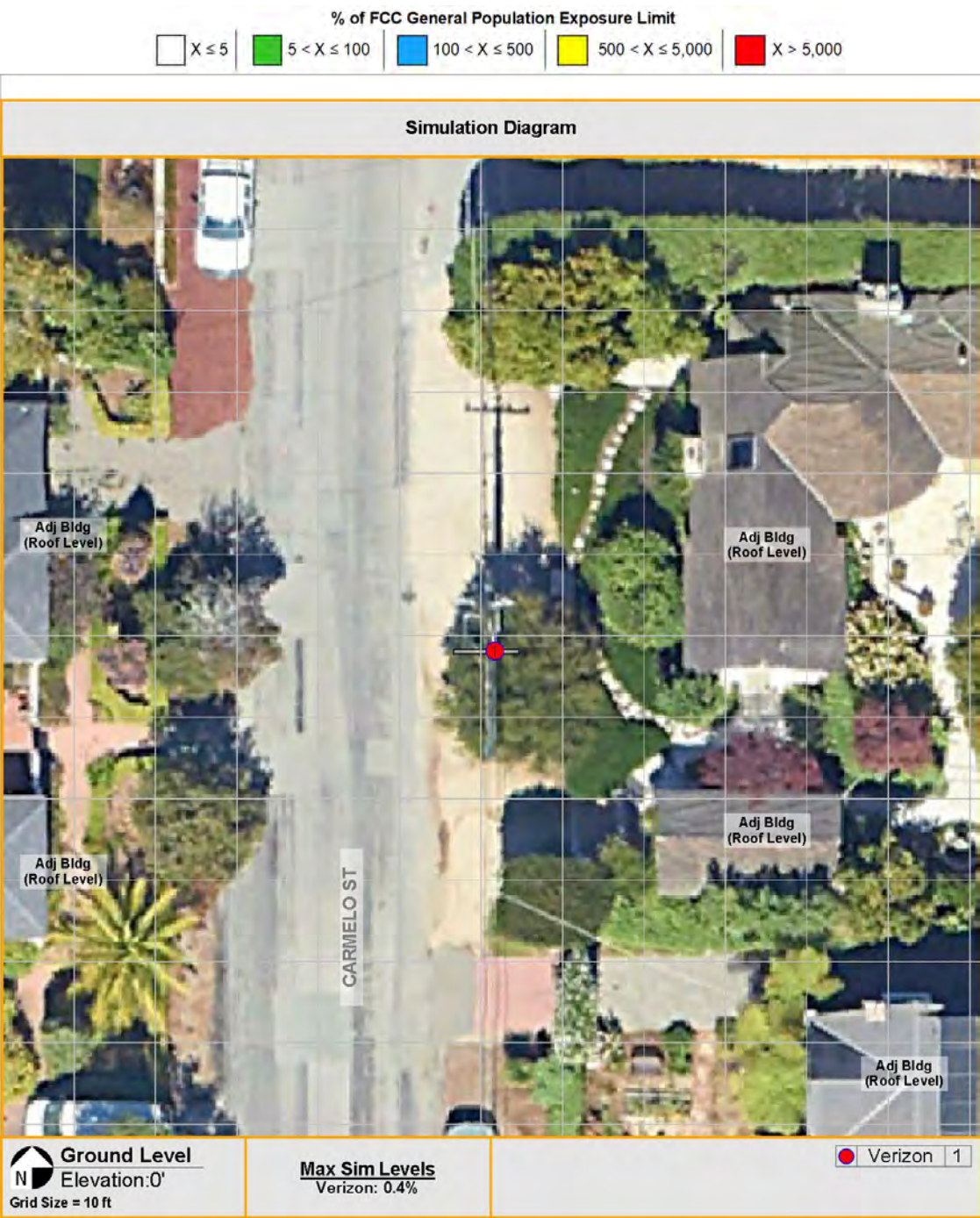
Site Technical Specifications

Antenna ID	Antenna Num	Operator	Antenna Mfg	Antenna Model	Type	Frequency (MHz)	Orientation (°T)	Horizontal BWidth (°)	Antenna Aperture (ft)	Antenna Gain (dBd)	Total Input Power (Watts)	Duty Cycle	Total ERP (Watts)	Rad Center Height Above Ground (Z) (ft)
A1	1	Verizon	JMA	CX200MI236-1Cxy	Canister	1965	0	267	2.5	4.2	240	1.0	626	48.6
A1	1	Verizon	JMA	CX200MI236-1Cxy	Canister	2120	0	296	2.5	4.5	240	1.0	683	48.6
A1	1	Verizon	JMA	CX200MI236-1Cxy (ENV)	Canister	3700	0	66	2.5	11.5	320	0.8	3576	48.6

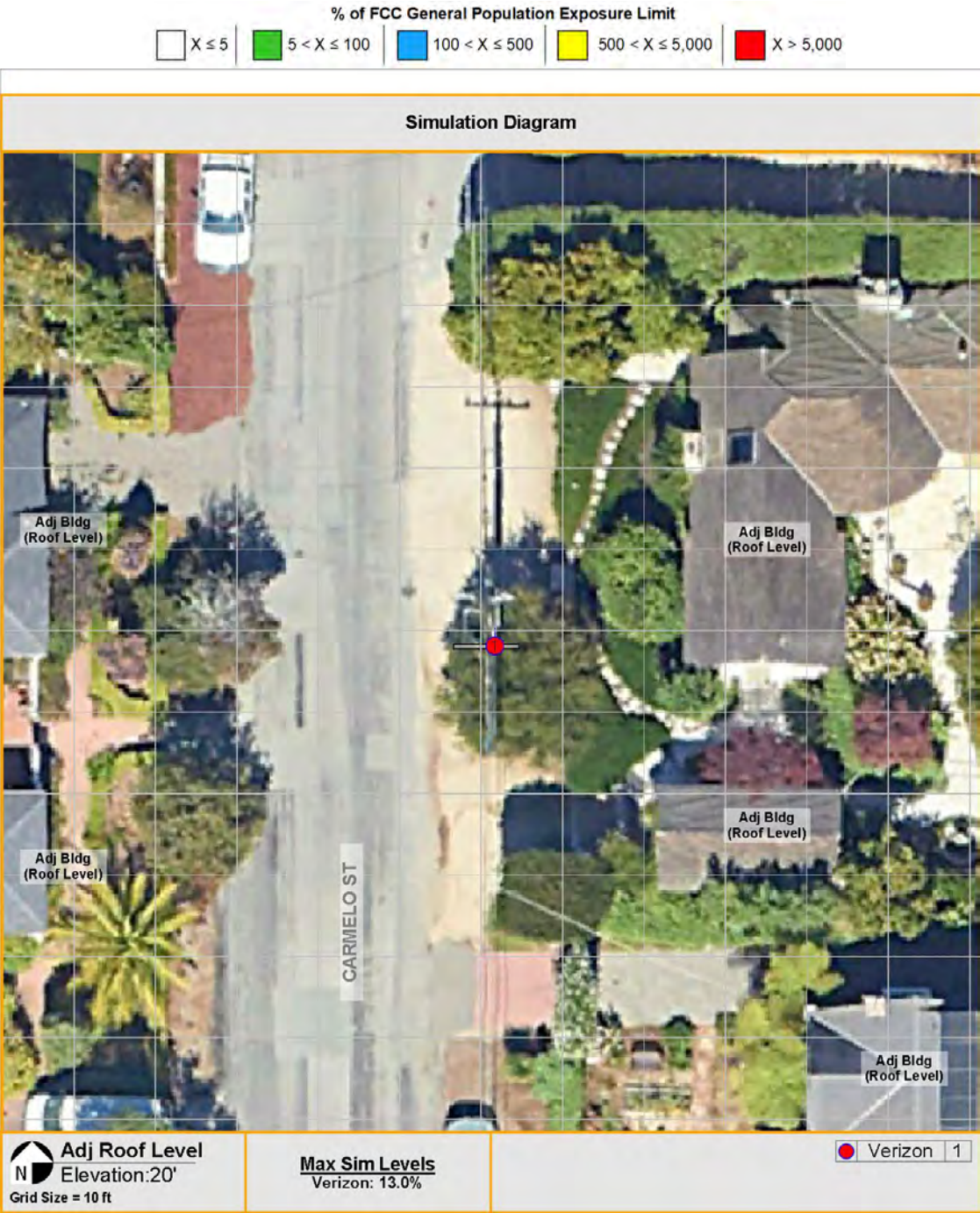
3.0 ANALYSIS

3.1 Emission Predictions

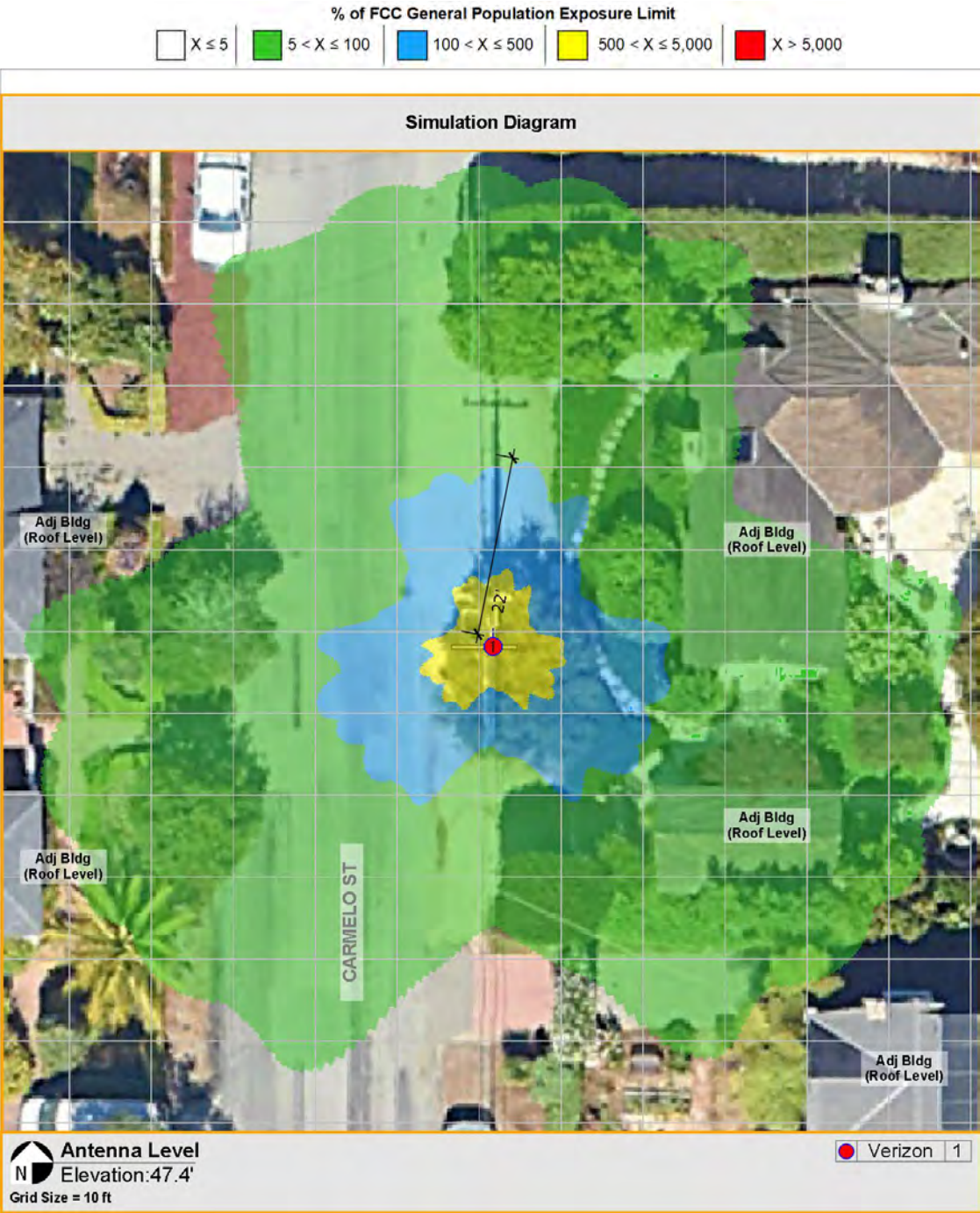
Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits for a typical 6-foot person. White represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red— greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in white and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



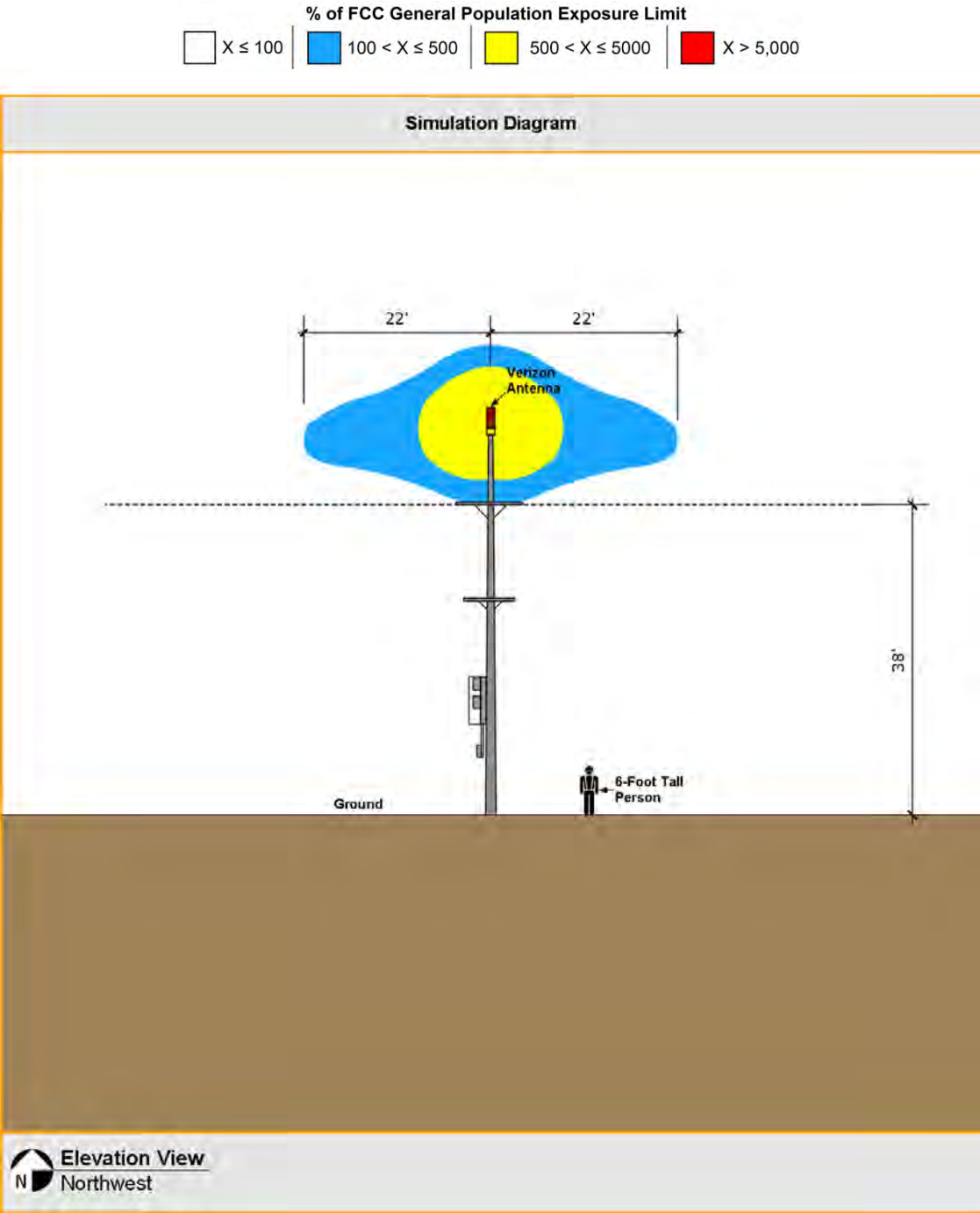
Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits for a typical 6-foot person. White represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in white and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits for a typical 6-foot person. White represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in white and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



Vertical view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits for a typical 6-foot person. White represents areas where exposure levels are calculated to be at or below 100%; blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in white for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



4.0 CONCLUSION

4.1 Results

For a typical 6-foot person standing in accessible areas on the Ground and Adjacent Bldg Roof, exposure levels for Verizon's site are calculated to be BELOW the FCC's most stringent General Population MPE Limits.

At antenna elevation, the highest calculated exposure level is above the FCC's General Population MPE Limits near the Verizon antenna(s). The maximum overexposed areas extend 22 feet from the front face of the Verizon antenna(s). There are no other buildings or surrounding structures at or higher than antenna height within the overexposed areas. Beyond this clearance distance, exposure levels are predicted to be below the FCC's General Population MPE Limits.

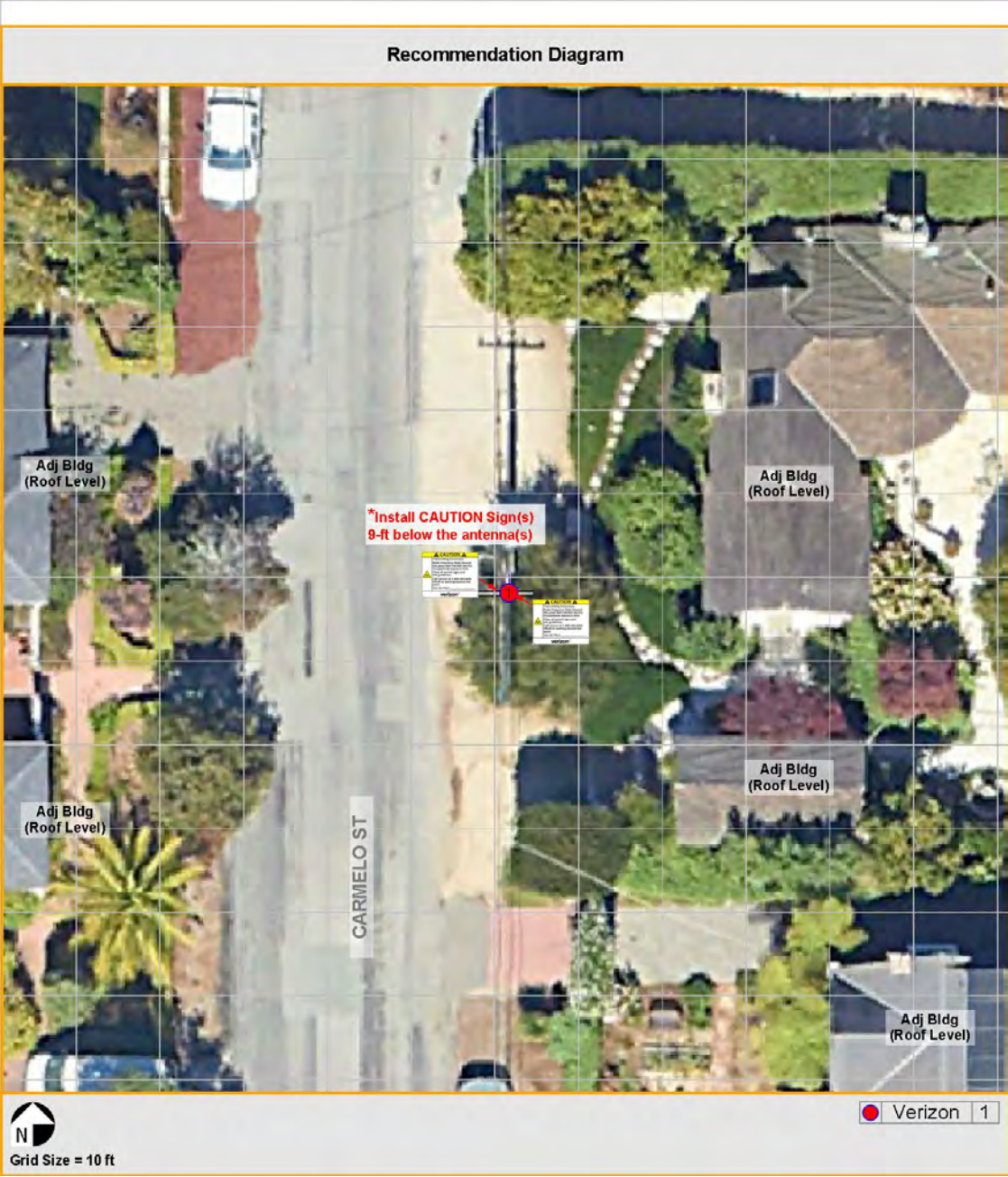
There may be situations where workers may find themselves directly in front of the antennas or in areas where RF exposure levels may exceed the MPE Limits. Such individuals entering the facility or working near the antennas must be made fully aware of areas of potential concern. Implement an RF safety program/plan. Proper notification including identification of restricted areas or RF exposure maps, antenna shutdown procedures and contact information must be provided to the facility's landlord or property owner. This will help ensure that a regional point of contact or the Network Operation Center (NOC) will be contacted in the event maintenance activities are required inside the RF restricted areas.

4.2 Recommendation(s)

The following compliance action(s) would be sufficient to meet the FCC's and Verizon's RF Safety Guidelines:

- 1) Install RF advisory signs according to the Recommendation diagram.

Recommendation(s)



4.3 Statement of Compliance

Based on the results, analysis and recommendation(s), it is the undersigned's professional opinion that Verizon's site will be compliant provided recommendation(s) are implemented.

4.4 Engineer Certification

This report has been prepared by or under the direction of the following Registered Professional Engineer: Darang Tech, holding California registration number 16000. I have reviewed this report and believe it to be both true and accurate to the best of my knowledge.



Appendix A: Background

Dtech uses the FCC's guidelines described in detail in Office of Engineering & Technology, Bulletin No. 65 ("OET-65") "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields". The table below summarizes the current Maximum Permissible Exposure ("MPE") safety limits classified into two groups: General population and Occupational.

FCC MPE Limits (from OET-65)

Frequency (Mhz)	General Population/ Uncontrolled MPE (mW/cm)	Averaging Time (minutes)	Occupational/ Controlled MPE (mW/cm)	Averaging Time (minutes)
30 - 300	0.2	30	1.0	6
300 - 1500	Frequency (Mhz)/1500 (0.2 – 1.0)	30	Frequency (Mhz)/300 (1.0 – 5.0)	6
1500 - 100,000	1.0	30	5.0	6

General population/uncontrolled limits apply in situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment, and may not be fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public always fall under this category when exposure is not employment-related.

Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment, and those persons have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits, as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

It is important to understand that the FCC guidelines specify *exposure* limits not *emission* limits. For a transmitting facility to be out of compliance with the FCC's RF safety guidelines an area or areas where levels exceed the MPE limits must, first of all, be in some way *accessible* to the public or to workers. When accessibility to an area where excessive levels is appropriately restricted, the facility or operation can certify that it complies with the FCC requirements.

Appendix B: Measurement and/or Computer Simulation Methods

Spatial averaging measurement technique is used. An area between 2 and 6 feet, approximately the size of an average human, is scanned in single passes from top to bottom in multiple planes. When possible, measurements were made at very close proximity to the antennas and inside the main beam where most of the energy is emitted. The spatial averaged values were recorded. A result higher than 100% exceeds the FCC's General Population MPE Limits.

Dtech uses an industry standard power density prediction computer Model¹ to assess the worse-case, cumulative EMF impact of the surrounding areas of the subject site. In addition, the analysis is performed at 80% duty cycle for all (C-Band/CBRS/mmWave/AAH) TDD technologies. All other frequencies are operating at 100% duty cycle transmitting at maximum total power. Lower Interiors (if applicable), were analyzed 10-feet below roof level with a 10dB deck attenuation. For purposes of a cumulative study, nearby transmitters are included where possible. The result is a surrounding area map color-coded to percentages of the applicable FCC's MPE Limits.

Appendix C: Limitations

The conclusions in this document rendered by Dtech are based solely upon the information collected during the site survey and/or furnished by our Client which Dtech believes is accurate and correct. Dtech, however, has no responsibility should such Client provided information prove to be inaccurate or incorrect. Third party specification estimates used for cumulative computer simulation purposes, where applicable, are based on common industry practices and our best interpretation of available information. Data, results and conclusions in this document are valid as of its date. However, as mobile technologies continuously change, these data, results and conclusions may also be at variance with such future changes. Dtech has no responsibility to update its survey or report to account for such future technology changes. This document was prepared for the use of our Client only and cannot be utilized by any third party for any purpose without Dtech's written consent. Dtech shall have no liability for any unauthorized use of this document and any such unauthorized user shall defend, indemnify and hold Dtech and its owners, directors, officers and employees harmless from and against any liability, claim, demand, loss or expense (including reasonable attorney's fees) arising from such unauthorized use.

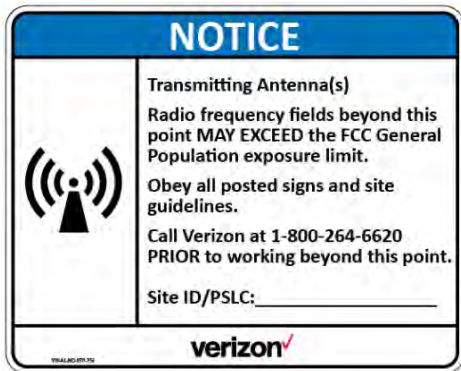
¹ Roofmaster(tm)

Appendix D: Sample RF Advisory Signs²

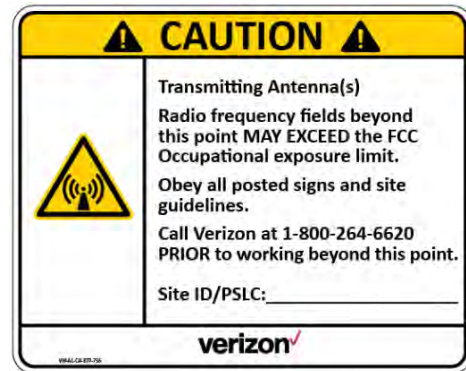
GUIDELINES



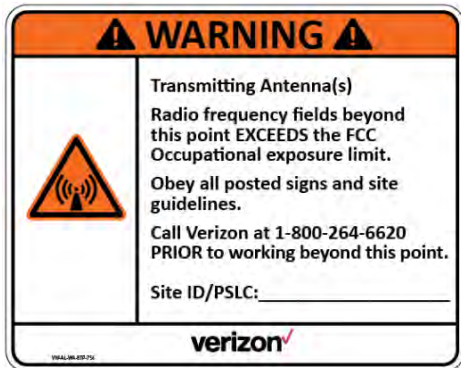
NOC INFORMATION



NOTICE



CAUTION



WARNING

² The above signage is for reference only. Actual signs may be updated in accordance to Verizon RF policy

**Verizon Wireless • Proposed Base Station (Site No. 428216 “SC001 Carmelo Stonewall”)
Carmelo Street South of 10th Avenue • Carmel-By-The-Sea, California**

Exhibit I

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained on behalf of Verizon Wireless, a wireless telecommunications carrier, to evaluate the small cell base station (Site No. 428216 “SC001 Carmelo Stonewall”) proposed to be located on Carmelo Street, in Carmel-By-The-Sea California, for compliance with municipal limits on sound levels from the installation.

Executive Summary

Verizon proposes to install one cylindrical antenna on the utility pole sited in the public right-of-way on the east side of Carmelo Street in Carmel-By-The-Sea, about 80 feet south of its intersection with 10th Avenue. Noise from the proposed operation will comply with the City’s pertinent noise limits.

Prevailing Standard

Carmel-by-the-Sea regulates noise in Chapter 8.56 “Noise Regulations” of its Municipal Code, which classifies noise from equipment operated in the public interest, including public utility equipment, as “Class A” noise. Section 8.56.030 specifically exempts the creation and emission of Class A noise from the provisions of the City’s noise regulations.

Figure 1 attached describes the calculation methodology used to determine applicable noise levels for evaluation against the prevailing standard.

General Facility Requirements

Wireless telecommunications facilities (“cell sites”) typically consist of two distinct parts: the electronic base transceivers (also called “radios”), that are connected to traditional wired telephone lines, and the antennas, that send wireless signals created by the radios out to be received by individual subscriber units. The radios are typically located on or at the base of the pole and are connected to the antennas by cables. Some radios require fans to cool the electronics inside. Some radios are integrated with the antennas as a single unit.

Site & Facility Description

According to information provided by Verizon, including drawings by All States Engineering and Surveying, dated November 12, 2024, that carrier proposes to install a cylindrical antenna on top of a new utility pole to replace the existing one sited in the public right-of-way on the east side of Carmelo Street in Carmel-By-The-Sea, about 80 feet south of its intersection with 10th Avenue. Two Ericsson radios, one each Models 4890 and 8863 would be mounted lower on the pole, at least 11 feet above ground.



**Verizon Wireless • Proposed Base Station (Site No. 428216 “SC001 Carmelo Stonewall”)
Carmelo Street South of 10th Avenue • Carmel-By-The-Sea, California**

Study Results

The antenna is passive, generating no noise, and both Ericsson radios are convectively cooled, that is, configured without cooling fans. Since none of the proposed equipment makes noise, the proposed operation will comply with the City’s noise limits.

Conclusion

Based on the information and analysis above, it is the undersigned’s professional opinion that operation of the base station proposed by Verizon Wireless on Carmelo Street in Carmel-By-The-Sea will, under the conditions noted above, comply with the municipal standards limiting acoustic noise emission levels.

Authorship

The undersigned author of this statement is a qualified Professional Engineer, holding California Registration Nos. E-13026 and M-20676, which expire on June 30, 2025. This work has been carried out under his direction, and all statements are true and correct of his own knowledge except, where noted, when data has been supplied by others, which data he believes to be correct.



William F. Hammett
William F. Hammett, P.E.
707/996-5200

November 15, 2024



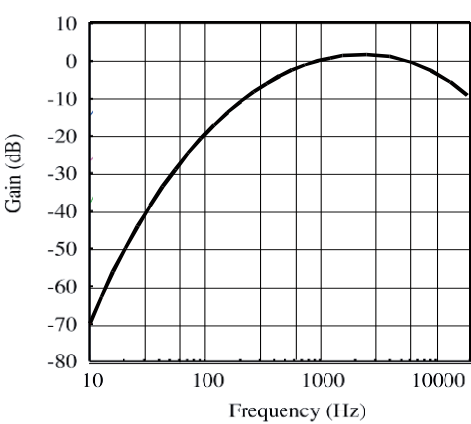
HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
SAN FRANCISCO

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Page 2 of 2

Noise Level Calculation Methodology

Most municipalities and other agencies specify noise limits in units of dBA, which is intended to mimic the reduced receptivity of the human ear to Sound Pressure (“L_p”) at particularly low or high frequencies. This frequency-sensitive filter shape, shown in the graph to the right as defined in the International Electrotechnical Commission Standard No. 179, the American National Standards Institute Standard No. 5.1, and various other standards, is also incorporated into most calibrated field test equipment for measuring noise levels.



30 dBA	library
40 dBA	rural background
50 dBA	office space
60 dBA	conversation
70 dBA	car radio
80 dBA	traffic corner
90 dBA	lawnmower

The dBA units of measure are referenced to a pressure of 20 μPa (micropascals), which is the threshold of normal hearing. Although noise levels vary greatly by location and noise source, representative levels are shown in the box to the left.

Manufacturers of many types of equipment, such as air conditioners, generators, and telecommunications devices, often test their products in various configurations to determine the acoustical emissions at certain distances. This data, normally expressed in dBA at a known reference distance, can be used to determine the corresponding sound pressure level at any particular distance, such as at a nearby building or property line. The sound pressure drops as the square of the increase in distance, according to the formula:

$$L_p = L_K + 20 \log(D_K/D_p),$$

where L_p is the sound pressure level at distance D_p and L_K is the known sound pressure level at distance D_K.

Individual sound pressure levels at a particular point from several different noise sources cannot be combined directly in units of dBA. Rather, the units need to be converted to scalar sound intensity units in order to be added together, then converted back to decibel units, according to the formula:

where L_T is the total sound pressure level and L₁, L₂, etc are individual sound pressure levels.

$$L_T = 10 \log (10^{L_1/10} + 10^{L_2/10} + \dots),$$

Certain equipment installations may include the placement of barriers and/or absorptive materials to reduce transmission of noise beyond the site. Noise Reduction Coefficients (“NRC”) are published for many different materials, expressed as unitless power factors, with 0 being perfect reflection and 1 being perfect absorption. Unpainted concrete block, for instance, can have an NRC as high as 0.35. However, a barrier’s effectiveness depends on its specific configuration, as well as the materials used and their surface treatment.



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

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 12th Avenue to 7th 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.

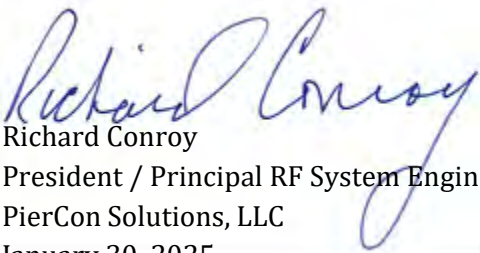
13. 911 calls on any carrier?

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).

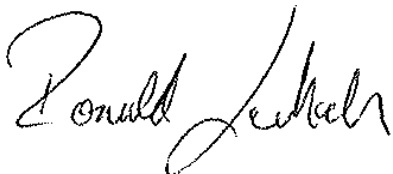
Under these conditions, user devices remain camped on Verizon's network and attempt to place calls—including 911 calls—on that network. Because signal quality is poor, calls frequently fail or drop. This behavior is confirmed by the dropped-call data presented, which shows elevated call failures within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

Exhibit 1

VERIZON WIRELESS BEST SERVING TRANSMITTER IN AREA OF GAP

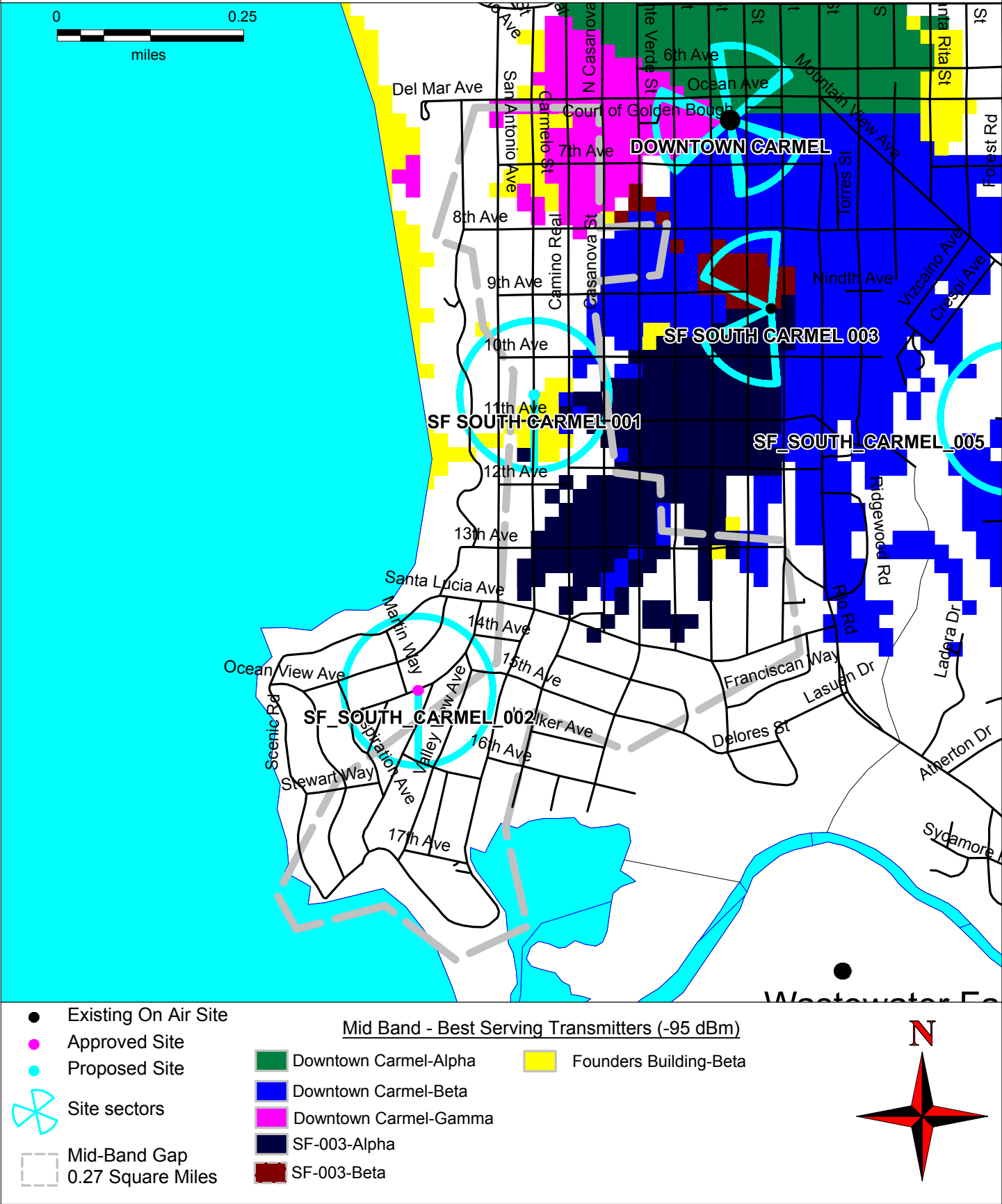
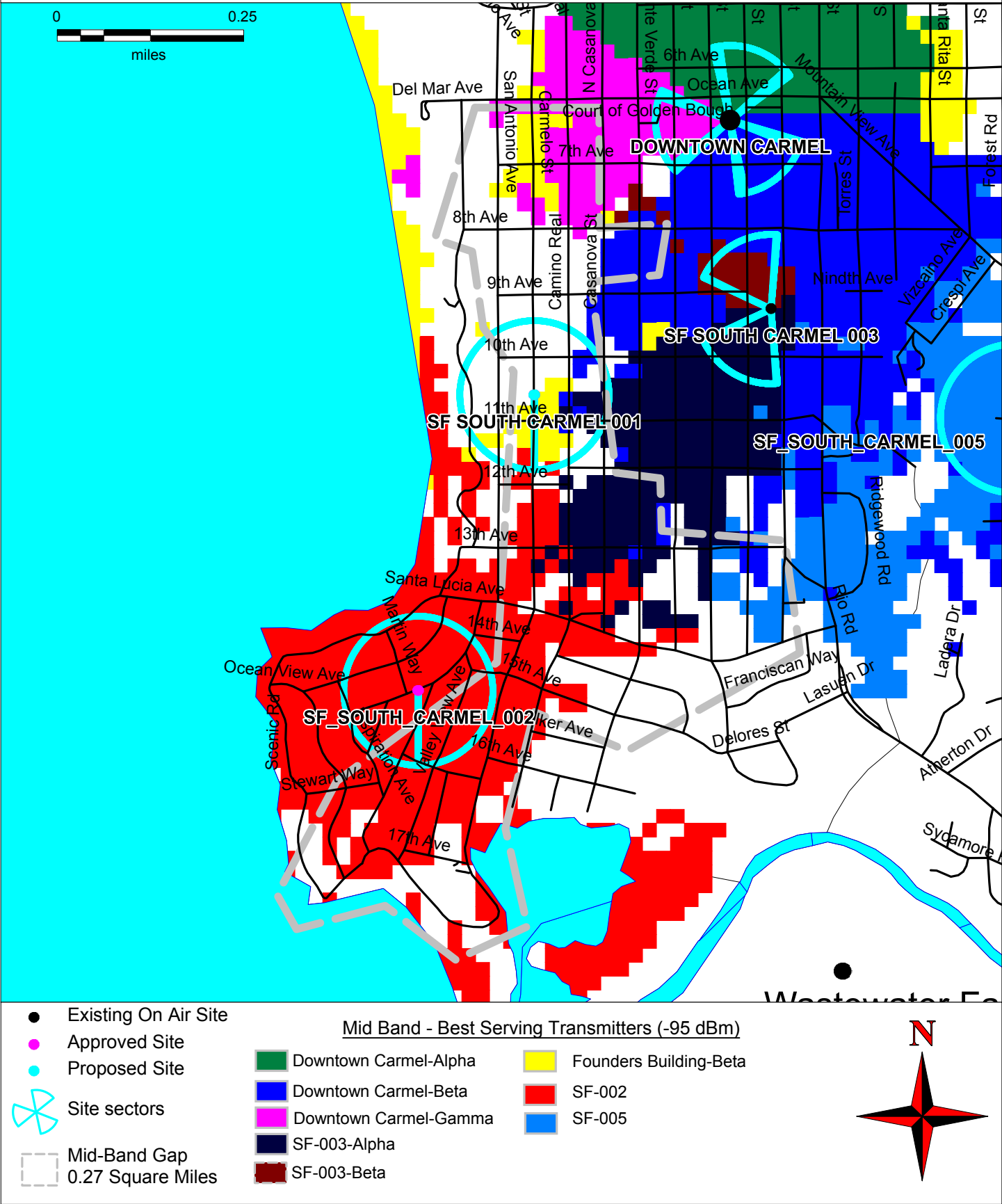


Exhibit 2

VERIZON WIRELESS
BEST SERVING TRANSMITTER IN AREA OF GAP



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

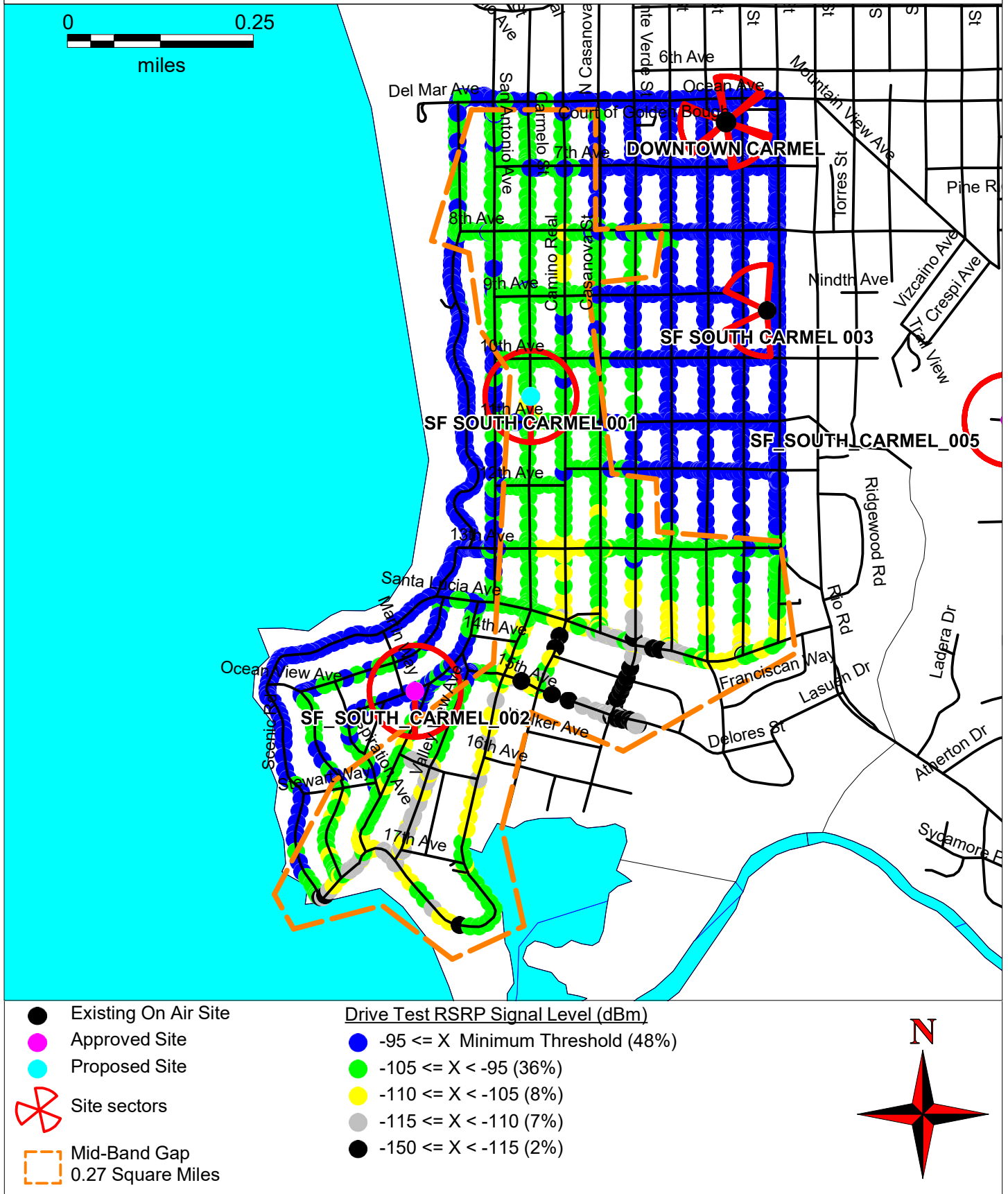


Exhibit 4

VERIZON WIRELESS
700 MHz LOW BAND - ON AIR DRIVE (SCAN TEST) DATA
TESTED 2/19/2025

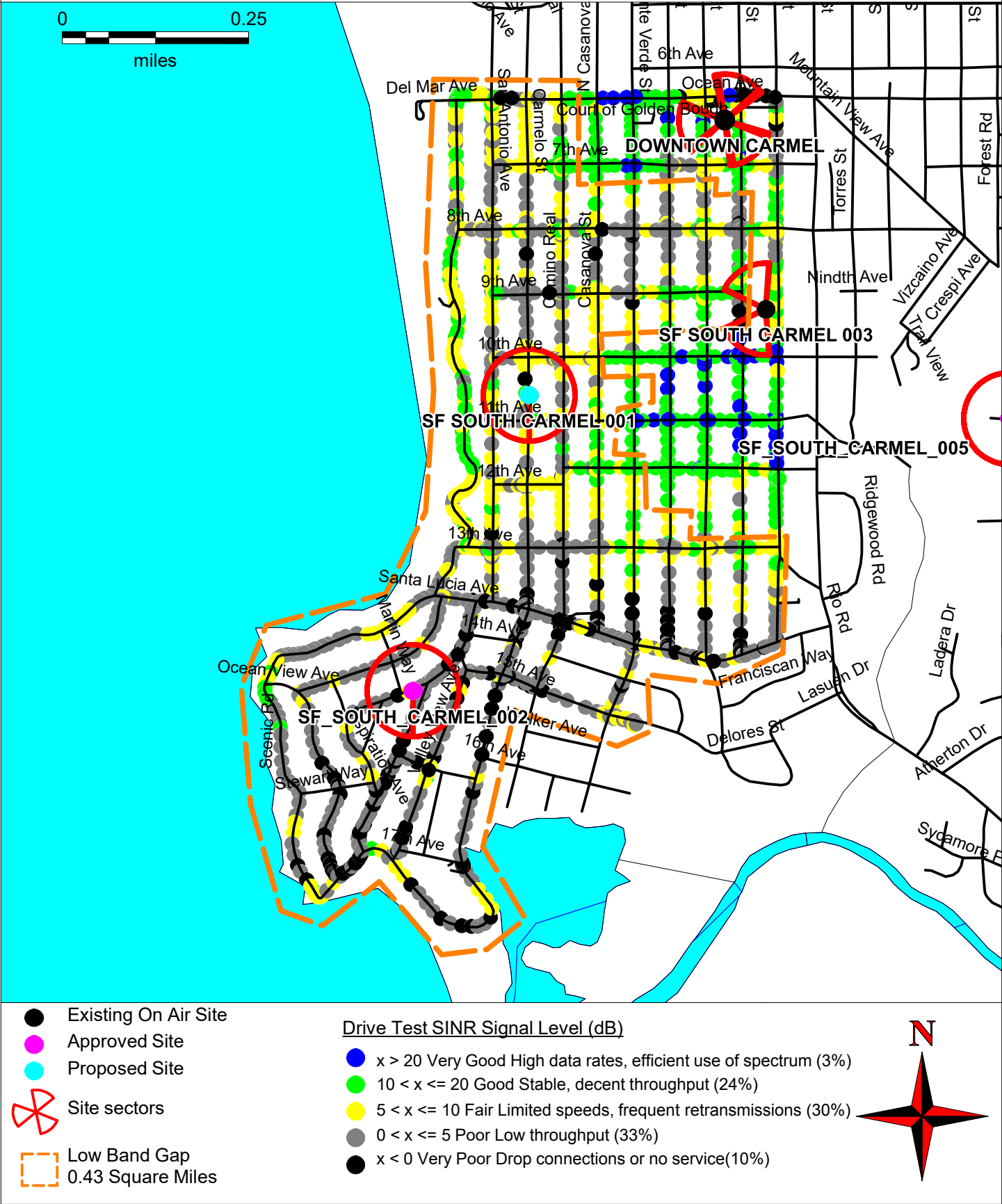
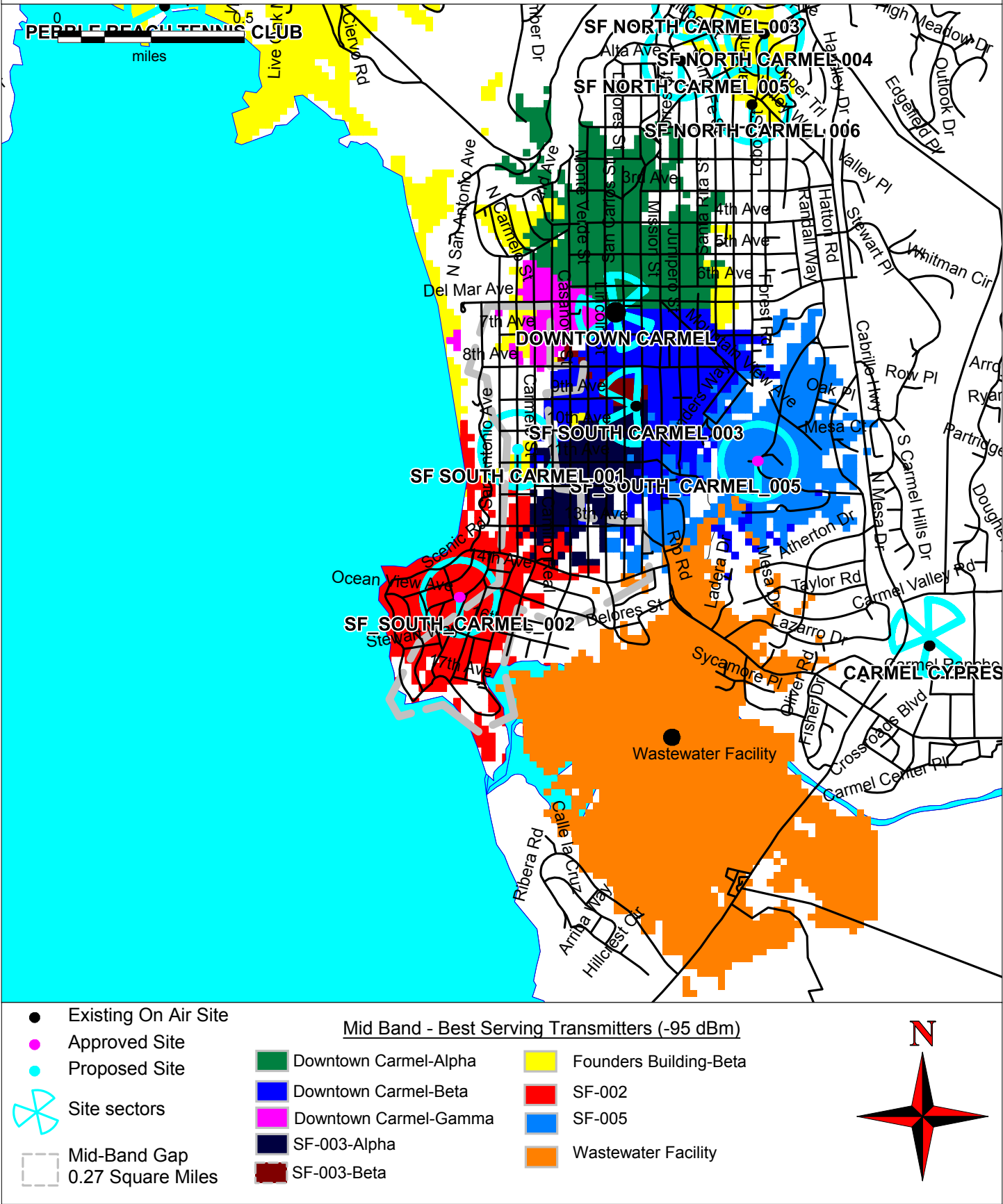


Exhibit 5

VERIZON WIRELESS
BEST SERVING TRANSMITTER IN AREA OF GAP



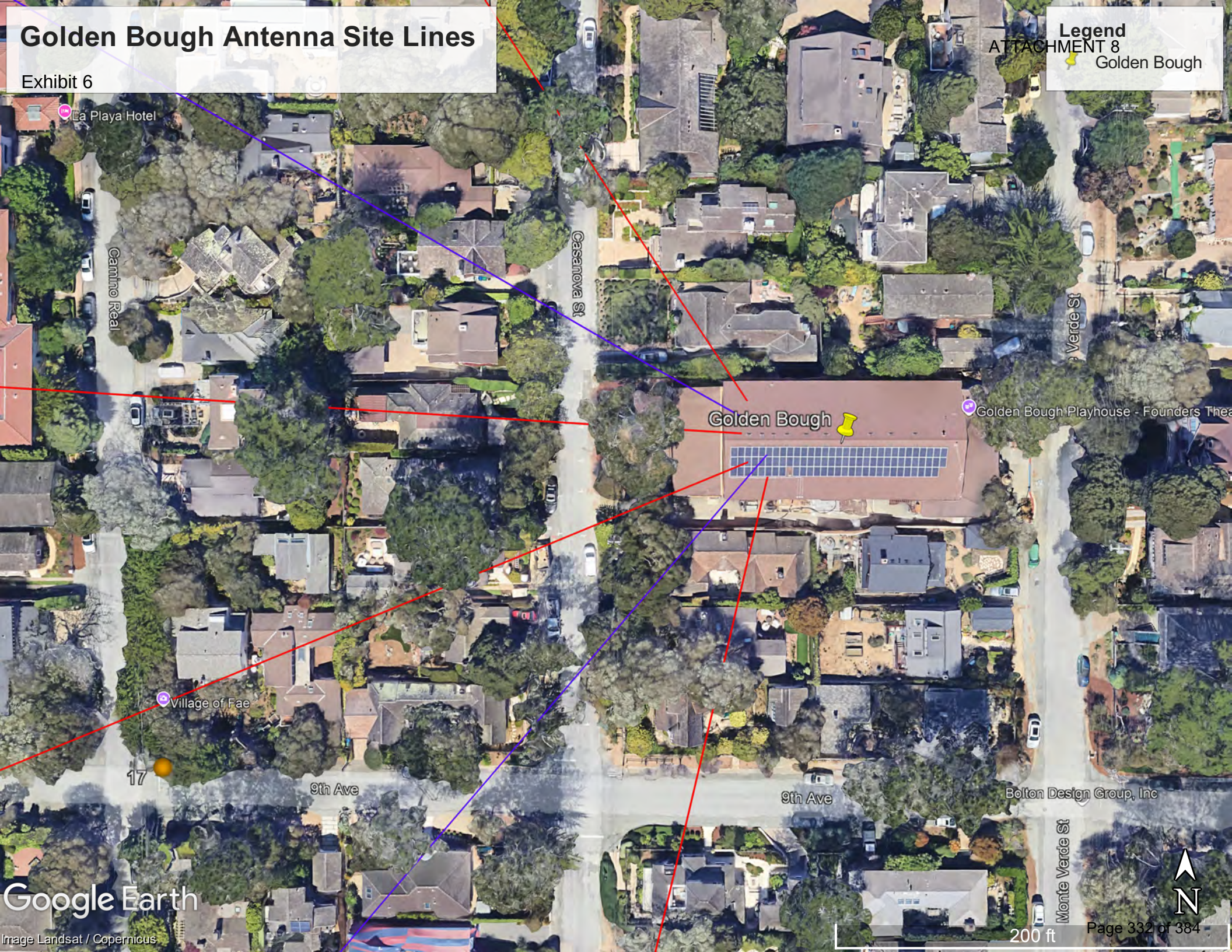
Golden Bough Antenna Site Lines

Exhibit 6

Legend

ATTACHMENT 8

Golden Bough



Google Earth

Image Landsat / Copernicus

**TRS-RenTelco**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:

Temperature: 23 °C	Relative Humidity: 33%
Calibration Procedure: CS900877	Calibration Date: Nov 15, 2024
Calibrated By: RODNEY REYES	Calibration Due Date: 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-5GNR;B
Serial Number: 82207003
Description: SCANNER
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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 --->

TRS-RenTelco 800-621-6354
ID: 1281812 Date: 11/15/24
REYESRO Due: 11/15/26



Radio Frequency Supplemental Report #3

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
February 9, 2026

Golden Bough Rooftop Technical Viability Determination

There is a significant gap in wireless service between Ocean Ave and 13th Ave from Scenic Road to Casanova Street. The gap has been determined through field collected drive test data utilizing a calibrated scanning receiver. The data has been presented in raw form with no manipulation in accordance with standard engineering practices. The drive test data demonstrated poor low band signal quality and lack of mid-band signal power for inbuilding services. The gap is due to the lack of a dominant serving site combined with distance away from existing and planned facilities.

The service area surrounding the proposed facility is best characterized as a topographically constrained dense residential coastal environment, where rapidly descending terrain toward the shoreline, mature vegetation, and irregular street layouts produce highly variable propagation conditions. These characteristics limit the effectiveness of broad, directional coverage strategies and instead favor a localized small cell architecture designed to provide reliable in-building service within discrete neighborhood coverage zones.

Residential traffic patterns in this area are distributed rather than corridor-based, further supporting the use of an omnidirectional small cell to deliver balanced signal conditions in all directions without introducing sector boundaries that may degrade signal dominance or mobility performance. The proposed facility is therefore engineered with a low-gain omnidirectional antenna and electrical downtilt to concentrate usable energy into the surrounding residential area while maintaining controlled propagation and minimizing the potential for overshoot toward the coastline.

Consistent with modern small-cell design principles, the proposed node is positioned to function as part of a coordinated network with the previously approved facilities, completing the intended spacing geometry necessary to achieve the identified in-building service objective. This localized design approach is particularly appropriate in environments where terrain transitions and vegetation influence signal behavior and where closer site placement improves both downlink reliability and uplink feasibility for indoor users.

Consistent with the network design approach described above, any alternative facility must be capable of delivering localized, dominant in-building coverage within the defined service area while integrating effectively into the planned small-cell spacing geometry. Equivalency is therefore evaluated based on the ability of a candidate location to provide controlled small cell propagation, maintain predictable signal quality, and support reliable uplink connectivity for indoor users without introducing excessive inter-cell overlap or unintended coverage extension beyond the target neighborhood.

This evaluation applies established RF engineering methodology to determine whether a technically viable solution exists that can reliably achieve the defined in-building service objective within the subject area.

As shown in Exhibit 1A, the Golden Bough rooftop is positioned outside the established small cell spacing geometry relative to the defined service gap.

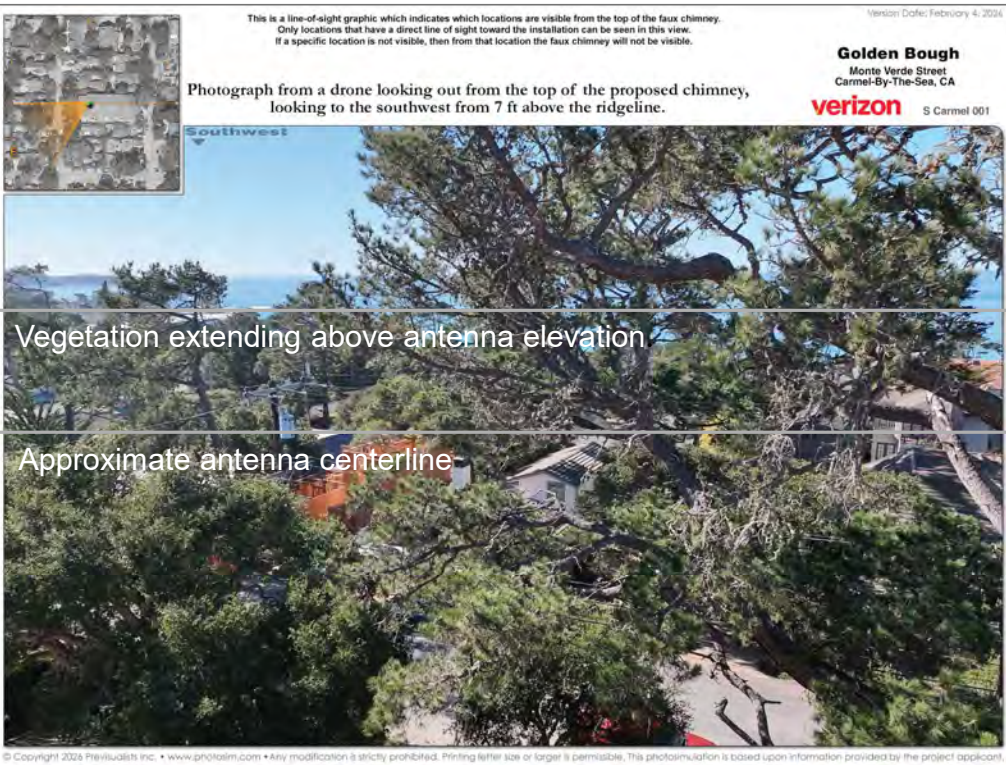
Alternative configurations that rely on projecting signal over distance, rather than establishing proximity-based service within the residential area, may not achieve these objectives in environments where terrain transitions and vegetation influence propagation behavior. Accordingly, candidate sites were assessed not only through predictive modeling, but also through consideration of physical antenna placement feasibility and the surrounding clutter environment to determine whether they could provide an engineering solution comparable to the proposed facility.

The Golden Bough rooftop was evaluated as a potential alternative location to determine whether it could provide an engineering solution equivalent to the proposed facility under the small cell design criteria described above. While predictive coverage modeling may suggest the ability to extend signal into portions of the service area, field verification and site-specific conditions indicate that the rooftop presents physical and radio-frequency constraints that limit its effectiveness for localized in-building coverage.

Exhibit 2A provides field-verified photographic documentation illustrating the directional constraints associated with the rooftop environment.

EXHIBIT 2A – Field-Verified Physical Constraints

Southwest Orientation Vegetation Encroachment Into Radiation Plane



Northwest Orientation Extended Line-Of-Site Propagation Environment



Field verification demonstrates that rooftop siting conditions materially constrain the ability to achieve reliable, localized small cell coverage within the defined service area.

The southwest antenna orientation is subject to dense near-field vegetation that obstructs the antenna look angle and introduces attenuation not fully captured in predictive modeling. At mid-band frequencies, such obstruction reduces signal dominance and increases variability in indoor performance, particularly in residential environments where building penetration loss is already a governing factor. Conversely, the northwest orientation presents an extended line-of-sight propagation path across open water. Although favorable for signal travel, this geometry increases the likelihood of unintended coverage extension and inter-cell interference, which is inconsistent with the controlled coverage objectives of small cell architecture.

Additionally, the rooftop's position relative to the previously approved facilities does not align with the intended spacing geometry necessary to establish proximity-based service within the defined gap area. Small cell networks rely on appropriately distributed node placement to improve both downlink reliability and uplink feasibility for indoor users; locations that primarily project signal over distance rather than reducing separation between the user and serving site are less effective in achieving these outcomes.

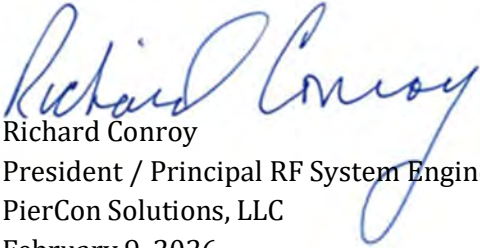
Although predictive modeling suggests that a facility located on the Golden Bough rooftop could extend signal into portions of the identified service gap, RF engineering viability must be evaluated based on real-world deployment conditions rather than theoretical propagation alone. Field verification confirms that mature vegetation extends directly into the feasible antenna radiation path at elevations comparable to, and in some cases exceeding, the proposed antenna centerline. Near-field obstruction of this nature is not fully captured in predictive modeling and is well understood to materially reduce signal dominance, increase variability in indoor performance, and limit uplink reliability — particularly at mid-band frequencies where foliage attenuation is pronounced.

Because small cell design relies on controlled, localized propagation and reduced separation between the user and serving site, a configuration that is simultaneously obstructed in the direction of the service objective and prone to unintended coverage extension cannot reasonably be expected to reliably remediate the documented service deficiency. Accordingly, while modeling may indicate theoretical signal reach, the engineering record does not support the Golden Bough rooftop as a technically viable location capable of achieving the defined in-building service objective.

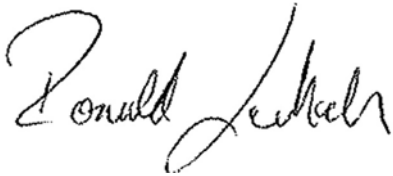
Based on the technical evaluation described above, the proposed facility represents the only technically viable location supported by the engineering record capable of delivering dominant, reliable in-building service within the defined gap area while integrating with the planned small cell spacing geometry. Alternative locations that are constrained by physical siting limitations or that rely on extending signal over distance do not provide the proximity-based coverage necessary to remediate the service deficiency and therefore cannot be considered viable engineering solutions.

Accordingly, based on the technical evaluation described herein, the engineering record demonstrates that the proposed facility is necessary to provide reliable, proximity-based in-building service within the defined gap area, and no technically viable alternative location has been demonstrated capable of reliably achieving this objective.

Prepared by:



Richard Conroy
President / Principal RF System Engineer
PierCon Solutions, LLC
February 9, 2026



Ronald Lukach
Senior RF Engineer
PierCon Solutions, LLC
February 9, 2026

Exhibit L**Verizon Wireless's Responses Volume 2**

<u>Topic</u>	<u>Page</u>
1. Gap Continued	1
2. Alternatives	2
3. Design Continued	3
4. Environmental Review Continued	4

1. GAP CONTINUED**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.

2. ALTERNATIVES

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.

3. DESIGN

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.

4. ENVIRONMENTAL REVIEW CONTINUED

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
ATTACHMENT 8
Golden Bough
 Monte Verde Street
 Carmel-By-The-Sea, CA

verizon 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.

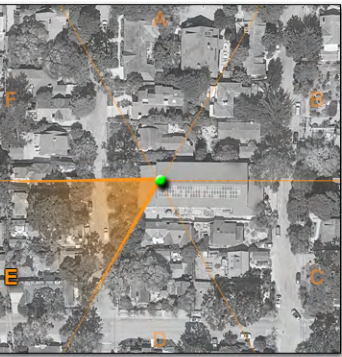
Southwest




Exhibit M**Verizon Wireless's Responses Volume 3**

<u>Topic</u>	<u>Page</u>
1. Design Continued	1
2. Alternatives Continued	1

1. DESIGN CONTINUED

We were asked about impacts to the adjacent oak tree.

Verizon Wireless, the City, and a PG&E arborist met at the site on February 4, 2026, to determine what impacts, if any, would impact the adjacent tree. PG&E's arborist determined that due to the site's distance from the tree, it would not impact the root system. Furthermore, the replacement pole will be placed in the same hole as the existing pole, so there will be no additional impacts to the roots.

2. ALTERNATIVES CONTINUED

The Commission and project opponents inquired about the feasibility of a wireless facility at the Golden Bough.Technical Infeasibility

As Verizon Wireless has maintained for the duration of this application, the Golden Bough is not technically feasible and available alternative. To further explain why a rooftop wireless facility on the Golden Bough is not technically feasible PierCon Solutions prepared a new report, Radio Frequency Supplemental Report # 4, dated February 23, 2026. The report summarized the additional technical evaluations PierCon Solutions performed and concludes that the Golden Bough "does not represent a technologically feasible alternative for achieving the documented service objectives under consistent engineering criteria." Report at p. 4. PierCon included an appendix to the report that includes the parameters of their analysis so that it can be duplicated and analyzed by the City's expert consultant, CTC. Report at p. 25.

Practical Infeasibility

Sequoia Deployment Services met with the Golden Bough on February 4, 2026, to evaluate the property to investigate the feasibility of locating a wireless telecommunications facility on the property that would meet Verizon Wireless's needs. The site design concept was to build a site with one equipment cabinet, four remote radio units, four panel antennas, generator receptacle or lug box, electrical power fiber connections, and associated cabling. The antennas and rooftop equipment would be screened with a faux chimney.

The building is approximately 165 feet east to west with a hip roof running in the east-west direction. The east and west ends are a full story lower than the main roof, necessitating that the antennas go on the upper roof. The south portion of the roof is occupied by a large solar array. The east end of the building is shorter than the west end since the property slopes down approximately 22 feet east to west. The main floor at the east end is below street level while the basement level at the west end is above street level.

The exterior of the property is entirely accessible to the public. The roof is only accessible with ladders and climbing equipment. PreVisualists, Inc. flew a drone with a camera to confirm roof conditions and potential surroundings from potential antenna locations. The coverage objective for the site is located west and southwest of the Golden Bough property, which requires antennas with views in those directions without immediate obstructions.



Verizon Wireless discussed height restrictions with the Planning Department prior to the visit, and they noted a ten-foot height limit above the top of the roof. This restriction limits antenna placement to the highest point of the roof near the west end for two reasons.

First, if the antennas were placed easterly on the building, the roof would interfere with the antennas oriented west. This location would diminish the effectiveness of this sector. Moving east also requires that any southwest or south oriented sector would be low compared to the level of the roof resulting in interference from the large solar array.

The second issue with placement off the west end of the roof is structural and equipment conflict. The west end of the roof is situated over a wall that extends backstage to the ground. This wall would support any loads through the building to the ground. This location is also accessible with cabling from below at the very back of the theater which already has utilities routed in this area and would not interfere with theater operations. The

rest of the upper roof is an approximately 55-foot unsupported span north to south over the theater and stage area which already supports considerable stage equipment and the ceiling inside the building. This area is intensely used with cables, supports, HVAC ducting and a central catwalk running most of the upper attic space. It would be difficult to route cabling from equipment below to this central part of the roof without interfering with the theater equipment.

Since that site visit, Golden Bough has requested that the antennas be placed at the north edge of the building. To accommodate this request, Verizon Wireless would have to install a much taller antenna structure. The structure would need to be 18 feet tall above the roof to maintain the same antenna elevation, where the height limit is ten feet above the roof. However, antennas at that location would likely have to be even taller.

Under either design, a ground cabinet is required to house fiber equipment. Due to the configuration of the available space and its uses inside the building, the best place to locate the cabinet is outside. The cabinet would be attached to the south wall of the building above where a trash dumpster is located.

While a wireless facility may be technically constructable at Golden Bough, it would not meet the Verizon Wireless's needs. Furthermore, in addition to requesting that the wireless facility be located at the north edge of the roof, the Golden Bough has also expressed a desire to expand its solar panel array. In addition to occupying roof space, solar panel arrays cause interference with wireless signals (passive intermodulation), causing network disruption. Finally, it is not clear that Golden Bough would even lease its property to Verizon Wireless. It has expressed concerns over interference and impacts to their operations.

Increased Costs

In terms of costs, construction of a wireless facility on the Golden Bough roof, even if it were possible, would run at least three to four times as the proposed facility. Because the Golden Bough is not a technically feasible alternative for Verizon Wireless, it has not negotiated a lease with the theater. However, private property rent is generally orders of magnitude greater than the rent associated with a Joint Pole Association pole. Furthermore, maintenance costs associated with a rooftop facility tend to be higher as well. The Golden Bough has also indicated that they may potentially request accommodations associated with their audio and visual equipment, which would further drive up the costs.

Historic Resource Impacts

The proposed pole is adjacent to a home designated as a Criteria 3 historic resource on the City's Inventory of Historic Resources.¹ However, the pole itself is located within the public right-of-way. Due to its relatively small physical presence, the proposed wireless facility would have minimal visual impact on the adjacent home. The pole itself is not a protected historic resource.

The proposed alternative structure, Golden Bough, is designated as a Criteria 1 historic resource on the City's Inventory of Historic Resources, which is a more protected designation than Criteria 3. A wireless facility proposed on the Golden Bough would require a Section 106 review, including completion and submission of Department of Parks and Recreation ("DPR") forms to the California State Historic Preservation Office ("SHPO"). The Golden Bough is historic, in contrast to the pole in the public right-of-way. Based on the

¹ Available at: https://ci.carmel.ca.us/sites/main/files/carmel_inventory_of_historic_resources_v11.2024.pdf

structure types and the footprint associated with each option, the proposed stealth antenna on the pole would have less impact on historic resources in the area than a rooftop wireless facility on the Golden Bough.

*Utility Pole Due North of Proposed Facility with Transformer
Carmelo Street between 10th Avenue & 11th Avenue*



*Utility Pole Due South of Proposed Facility with Side-Mounted Cabinet
Corner of Carmelo Street & 11th Avenue*





Radio Frequency Supplemental Report #4

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
February 23, 2026

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1. Executive Summary

This supplemental analysis was prepared in response to the City's determination that the Golden Bough rooftop may represent a less intrusive alternative to the proposed small wireless facility.

The purpose of this review is not to determine whether measurable signal could be produced from the rooftop, but rather to evaluate whether the Golden Bough location is capable of functioning as a technologically feasible alternative capable of achieving the identified service objectives under realistic deployment conditions.

The original Radio Frequency Report and subsequent supplements established through calibrated drive testing and propagation modeling that a localized service gap exists within this residential coastal area, particularly with respect to reliable in-building performance for mid-band services including AWS (2.1 GHz) and C-Band (3.7 GHz).

Following the hearing, additional technical evaluation was performed, including:

- Application of an uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB to ensure balanced two-way service and conservative in-building performance assessment;
- Comparative AWS path loss modeling of the proposed small cell and the Golden Bough rooftop under identical propagation assumptions;
- Evaluation of antenna configuration constraints associated with rooftop deployment;
- Line-of-sight (LOS) profile and free-space propagation analysis toward an unobstructed two-mile northwest path over water; and
- Assessment of electrical downtilt tradeoffs required to control extended signal projection.

The analysis demonstrates that the Golden Bough rooftop cannot simultaneously achieve controlled projection and sufficient uplink margin within the documented service gap area. When configured for reach, the rooftop projects substantial signal energy beyond the intended service area. When adjusted to limit projection through increased downtilt, localized coverage performance is reduced. In addition, rooftop installation constraints necessitate directional antenna configurations inconsistent with the coordinated small-cell deployment architecture established for this area.

Collectively, these findings indicate that while the Golden Bough rooftop may produce modeled signal under certain configurations, it does not represent a technologically feasible alternative for achieving the documented service objectives under consistent engineering criteria.

2. Background and Prior Engineering Record

This supplemental report builds upon the original Radio Frequency Engineering Report and subsequent technical submissions previously provided in support of the proposed small wireless facility.

2.1 Initial Engineering Evaluation

The original RF Engineering Report documented a localized service deficiency within the subject residential coastal area through calibrated drive testing and propagation modeling. The evaluation included:

- Measured RSRP and SINR data collected using industry-standard testing equipment;
- Analysis of both low-band and mid-band performance;
- Assessment of in-building service capability based on uplink-constrained design assumptions; and
- Identification of a defined service area requiring densification to support reliable mid-band service.

The findings demonstrated substandard performance within portions of the neighborhood, particularly with respect to indoor service reliability and mid-band capacity objectives.

The proposed small wireless facility was engineered to operate as part of a coordinated small-cell deployment strategy intended to provide proximity-based coverage and complete the intended node spacing geometry.

2.2 Subsequent Technical Supplements

Following initial review and public proceedings, additional supplemental analyses were prepared to respond to questions raised by the city and members of the public. These submissions addressed, among other topics:

- Clarification of mid-band performance characteristics, including C-Band deployment considerations;
- Technical background and need for the proposed small cell;
- Establishing the importance of a dominant signal and a controlled RF design;
- Expanded propagation modeling reflecting consistent engineering assumptions;
- Clarification regarding the operational status and coverage contribution of previously approved small-cell nodes; and
- Expanded Golden Bough engineering analysis addressing spatial positioning, proximity to the service area, antenna deployment constraints, and observed field conditions to evaluate whether the rooftop can achieve the identified service objectives under consistent engineering assumptions relative to the proposed small cell.

These supplements maintained consistent modeling methodology and applied identical propagation assumptions to ensure objective comparison across candidate locations.

2.3 City Determination and Identification of Alternate Location

In its decision, the city determined that the Golden Bough rooftop may represent a less intrusive alternative location capable of addressing the documented service deficiency.

The City's determination was based primarily on the assumption that signal could be produced from the rooftop location. The engineering question therefore becomes not whether signal can be generated, but whether the Golden Bough rooftop can represent a technologically feasible facility consistent with the established small-cell network design framework.

2.4 Purpose of This Supplemental Evaluation

Following the City's determination, additional engineering evaluation was conducted to assess the Golden Bough rooftop under realistic deployment conditions. This expanded analysis includes:

- Comparative AWS path loss modeling using an uplink-limited MAPL threshold;
- Antenna configuration and rooftop deployment constraint evaluation;
- Line-of-sight (LOS) profile and extended propagation assessment;
- Electrical downtilt tradeoff analysis; and
- Comparative signal behavior evaluation relative to the proposed small cell.

This report presents the results of that expanded analysis and evaluates the Golden Bough rooftop against established wireless engineering principles governing proximity, link balance, architectural consistency, and operational reliability.

3. Engineering Standard for Evaluating Alternatives

The evaluation of candidate wireless facility locations must be grounded in established radio frequency engineering principles and system-level network design methodology. The objective is not simply to determine whether measurable signal can be produced from a location, but whether that location can reliably achieve the defined service objectives under reasonably expected operating conditions.

Wireless networks are engineered as integrated systems. Accordingly, alternative locations must be assessed based on their ability to function within the intended network architecture and achieve the identified service objectives under consistent engineering criteria.

Sound engineering practice requires that candidate sites be evaluated using consistent modeling assumptions and objective performance criteria, including:

- Proximity to the area requiring service;
- Alignment with the planned small-cell deployment geometry;
- Compatibility with the intended antenna configuration and facility type;
- Ability to maintain balanced two-way communication under uplink-limited design conditions;
- Availability of sufficient link margin to tolerate normal environmental and operational variability; and
- Deployment conditions that are predictable and operationally controllable over time.

The presence of modeled signal alone does not establish technical viability. Engineering viability is determined by whether a location can deliver reliable, balanced service performance consistent with network design objectives, including in-building service requirements.

Mid-band spectrum deployments, including AWS and C-Band, are particularly sensitive to transmission distance, clutter, and indoor attenuation. As a result, such deployments typically rely on proximity-based small-cell architecture to maintain link balance and predictable performance. Facilities that rely primarily on extended transmission distance or materially different antenna configurations may produce signal; however, they do not necessarily satisfy the deployment and performance criteria governing the coordinated small-cell system.

In evaluating the Golden Bough rooftop, the same propagation models, terrain data, and uplink-limited maximum allowable path loss (MAPL) threshold were applied consistently across all scenarios to ensure objective comparison. The analysis therefore focuses on whether the rooftop can satisfy the above engineering criteria relative to the proposed small cell.

This engineering standard provides the framework through which the Golden Bough rooftop is evaluated in the sections that follow.

4. Small Cell Network Design and Deployment Framework

The proposed facility is part of a coordinated small-cell deployment strategy intended to address a localized service deficiency within a residential coastal environment characterized by varied terrain, closely spaced homes, and mid-band propagation sensitivity.

4.1 Proximity-Based Coverage Design

Mid-band spectrum, including AWS and C-Band, provides higher spectral efficiency and greater user throughput capability than low-band frequencies. While low-band spectrum offers broader coverage reach, it is not well-suited for delivering sustained high data rates or improved signal quality in residential environments.

In the subject area, the service deficiency is characterized not by sector loading or congestion, but by the absence of a dominant serving mid-band layer and suboptimal SINR performance on low-band carriers. Deployment of AWS and C-Band is therefore intended to improve signal dominance, enhance SINR, and increase achievable user throughput, particularly for in-building service.

Proximity-based deployment reduces transmission distance between the antenna and end user, increasing available link margin and improving tolerance for indoor penetration loss, terrain variation, and routine environmental variability.

The proposed facility was engineered to operate within this proximity-based framework.

4.2 Deployment Architecture Selected for the Subject Area

Verizon has selected a proximity-based small-cell deployment architecture for this residential coastal area as the appropriate technical method for introducing and densifying mid-band services, including AWS and C-Band.

This architectural approach reflects Verizon's network design standards for residential environments where:

- Mid-band performance objectives require reduced transmission distance;
- In-building service reliability is a defined performance goal; and
- Coordinated node spacing is necessary to maintain balanced link conditions.

The proposed facility is engineered as one component of this coordinated small-cell system. Site selection, antenna configuration, and modeled performance were developed within this architectural framework.

Alternative locations must therefore be evaluated not solely on whether signal can be generated, but on whether they can function within the selected small-cell deployment architecture and achieve comparable service performance under the same design principles.

4.3 Coordinated Node Spacing and Network Geometry

Effective small-cell networks are engineered through coordinated node placement such that each facility serves a defined localized coverage area while minimizing excessive overlap and unintended coverage gaps. In mid-band deployments, node placement is derived from link budget constraints, propagation behavior, and the need to position each facility in functional alignment with the area of service demand.

The proposed SF-001 node location aligns with previously approved small-cell facilities to complete the intended coverage geometry within the neighborhood. This coordinated spacing approach:

- Supports continuous localized service;
- Maintains predictable cell dominance;
- Reduces unnecessary long-range projection; and
- Preserves balanced uplink and downlink conditions.

Small-cell placement is highly location-sensitive. Even modest positional shifts can materially alter dominant serving boundaries, uplink margin, and in-building performance. Accordingly, node placement within the service gap area is intentional and derived from propagation modeling and link budget analysis rather than arbitrary siting preference.

Exhibit A, to follow, illustrates the relative positioning of existing, approved, proposed, and alternate facilities in relation to the documented mid-band deficiency gap area. The mid-band

deficiency gap area is defined by the red-dashed polygon. The red-dashed polygon (gap area) was extrapolated by tracing the gap remaining after considering the wireless service contribution from the current on-air and planned facilities based upon the in-building drive test and coverage maps.

As shown in Exhibit A, the proposed SF-001 location occupies a central position within the identified deficiency gap area and maintains geometric alignment with previously approved nodes. The Golden Bough rooftop, while located within the broader neighborhood, is positioned toward the periphery of the deficiency gap area and nearer the edge of existing coverage dominance.

The relevant engineering consideration is whether the alternate location occupies a comparable geometric position within the service gap area sufficient to achieve the identified service objectives. The proposed SF-001 node was engineered to minimize transmission distance to the center of the documented deficiency gap area and to maintain balanced link conditions consistent with proximity-based small-cell architecture.

The Golden Bough rooftop does not occupy the same functional geometric position within the service gap area and would therefore operate under materially different transmission dynamics than the proposed node. Please refer to Exhibit A below for a graphical representation:

EXHIBIT A - SMALL CELL GEOMETRY



4.4 Balanced Two-Way Service and Uplink-Limited Design

Wireless networks operate as two-way communication systems. While downlink signal strength is often visually represented in propagation maps, system performance is typically constrained by the uplink due to the limited transmit power of user devices.

Accordingly, small-cell deployment for mid-band services is commonly designed using uplink-limited maximum allowable path (MAPL) loss thresholds to ensure balanced link conditions and consistent indoor performance.

The proposed facility was modeled using an uplink-limited MAPL of 127 dB, representing a conservative design condition intended to support reliable two-way communication, including in-building service.

This balanced-link design framework governs both node spacing and facility placement within the area of need.

4.5 Spatial Containment and Residential Deployment Objectives

In residential environments, small-cell installations are engineered to provide controlled, localized coverage rather than extended signal projection. Spatial containment is an important operational objective, as it:

- Limits unintended signal dominance beyond the intended service area;
- Reduces unnecessary handoff activity;
- Minimizes inter-cell overlap; and
- Supports predictable network behavior.

The proposed facility reflects these deployment objectives and is configured to provide localized mid-band service consistent with coordinated small-cell architecture.

4.6 Application to the Subject Area

The small-cell deployment plan for this neighborhood reflects:

- The documented service deficiency;
- The mid-band performance objectives of AWS and C-Band;
- The need for in-building reliability; and
- The geometric relationship between existing and approved facilities.

The proposed node location is therefore not arbitrary but is derived from link budget constraints, propagation behavior, and the need to complete the intended spacing geometry within the service gap area.

The sections that follow evaluate whether the Golden Bough rooftop can satisfy these same deployment and performance criteria.

5. Golden Bough Rooftop – Technical Evaluation

5.1 Evaluation Framework

Consistent with established radio frequency engineering practice, alternative wireless facility locations must be evaluated based on their ability to:

- Provide proximity-based coverage within the area requiring service;
- Operate within the intended small-cell network architecture;
- Maintain balanced two-way communication under uplink-limited design conditions;
- Provide sufficient link margin to tolerate normal environmental variability; and
- Function predictably under existing, controllable deployment conditions.

The following analysis evaluates the Golden Bough rooftop against these criteria.

5.2 Spatial Positioning Relative to the Service Gap

As illustrated in Exhibit A, the proposed SF-001 small cell occupies a central position within the documented mid-band deficiency gap area and aligns with the coordinated small-cell geometry established by previously approved nodes.

The Golden Bough rooftop, by contrast, is positioned toward the periphery of the deficiency gap area and nearer the edge of existing coverage dominance. Because it does not occupy the same geometric relationship to the service gap area, it would necessarily rely on greater transmission distance to reach portions of the documented gap.

Wireless performance is directly influenced by transmission distance. As separation between the antenna and end user increases, path loss increases and available link margin decreases. Facilities positioned outside the service gap area therefore operate with reduced tolerance for indoor attenuation, terrain variation, and normal environmental variability.

The question is not whether measurable signal can be generated from the rooftop, but whether it can provide the same proximity-based service performance as the proposed node under realistic operating conditions.

5.3 Rooftop Physical Constraints and Configuration Considerations

The Golden Bough rooftop presents physical and geometric constraints that preclude deployment of a true omnidirectional small-cell configuration. The sloped roof geometry, ridgeline obstruction, and mounting limitations restrict the ability to achieve uniform 360-degree radiation without pattern shadowing and structural interference. Furthermore, due to the Golden Bough's

location projecting coverage in the north, east, or south directions would conflict with coverage from the existing on-air facilities.

Accordingly, a sectorized rooftop configuration was modeled to approximate the gain and tilt characteristics of the proposed omnidirectional small-cell design while limiting radiation to feasible southwest and northwest sectors. This configuration represents the most favorable practicable approximation of small-cell performance achievable at the rooftop location.

The uplink-limited comparative modeling of this omni-equivalent configuration is presented in Section 5.5.

5.4 Interpretation of Uplink-Limited Path Loss Maps

The comparative modeling exhibits presented in this report utilize an uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB. Path loss represents the total signal attenuation between the base station and user device. Areas where modeled path loss exceeds 127 dB indicate insufficient uplink margin to reliably sustain communication under the applied design criteria.

The color scale applied in the exhibits reflects relative uplink margin with respect to the 127 dB threshold:

- Areas depicted with positive margin values represent locations where modeled path loss remains below the threshold and sufficient link margin is maintained.
- Areas depicted near 0 dB margin indicate minimal tolerance for additional attenuation, such as indoor penetration or terrain variability.
- Areas depicted with negative margin values represent locations where modeled path loss exceeds the allowable threshold and reliable uplink performance is not supported under the applied design assumptions.

All comparative exhibits utilize identical propagation parameters, clutter assumptions, antenna heights, and MAPL thresholds to ensure consistency and direct comparability between configurations.

5.5 Uplink-Limited Comparative Path Loss (Omni-Equivalent Evaluation)

To evaluate technological feasibility under balanced two-way communication conditions, a conservative uplink-limited maximum allowable path loss (MAPL) threshold of 127 dB was applied uniformly across all modeling scenarios.

MAPL represents the maximum allowable signal attenuation between the base station and user device while maintaining reliable communication. The 127 dB threshold reflects an uplink-constrained design condition and incorporates appropriate margin to support in-building service objectives.

Exhibit B presents a side-by-side comparison of AWS path loss modeling for:

- The proposed SF-001 omnidirectional small-cell configuration; and
- The Golden Bough rooftop modeled using an omni-equivalent sectorized configuration.

Identical terrain, clutter, antenna height, and MAPL assumptions were applied in both scenarios.

Under these consistent modeling conditions, the proposed small cell maintains positive uplink margin throughout the deficiency gap area. By contrast, the Golden Bough rooftop configuration exhibits predominantly sub-threshold performance (≤ 0 dB margin) across substantial portions of the documented deficiency gap area.

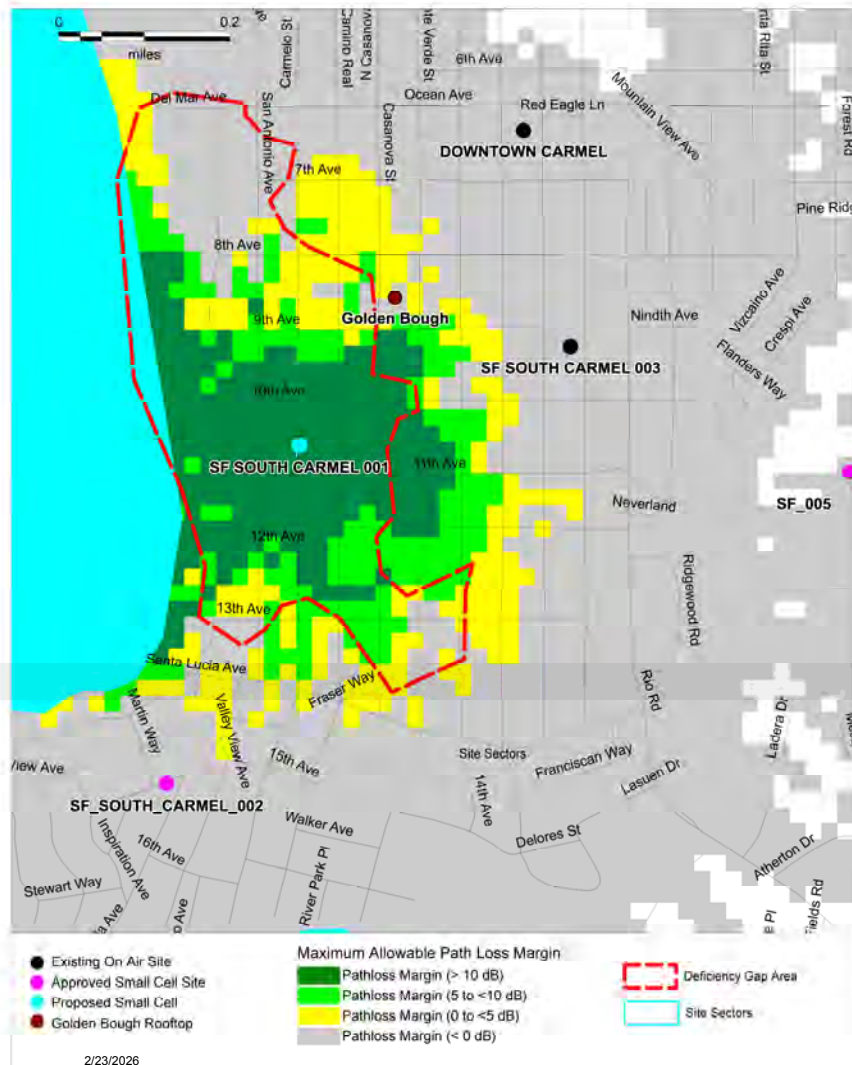
Areas operating at or below the MAPL threshold do not maintain usable uplink margin and therefore lack tolerance for indoor attenuation, terrain variability, and normal environmental fluctuation. As a result, the Golden Bough configuration does not sustain balanced two-way communication conditions within the deficiency gap area under uplink-limited evaluation.

The relevant engineering question is not whether isolated signal presence can be produced, but whether sufficient positive link margin is maintained to support predictable in-building performance. Based on the modeling reflected in Exhibit B, the Golden Bough rooftop does not maintain sufficient uplink margin to achieve the identified service objectives within the documented service gap area.

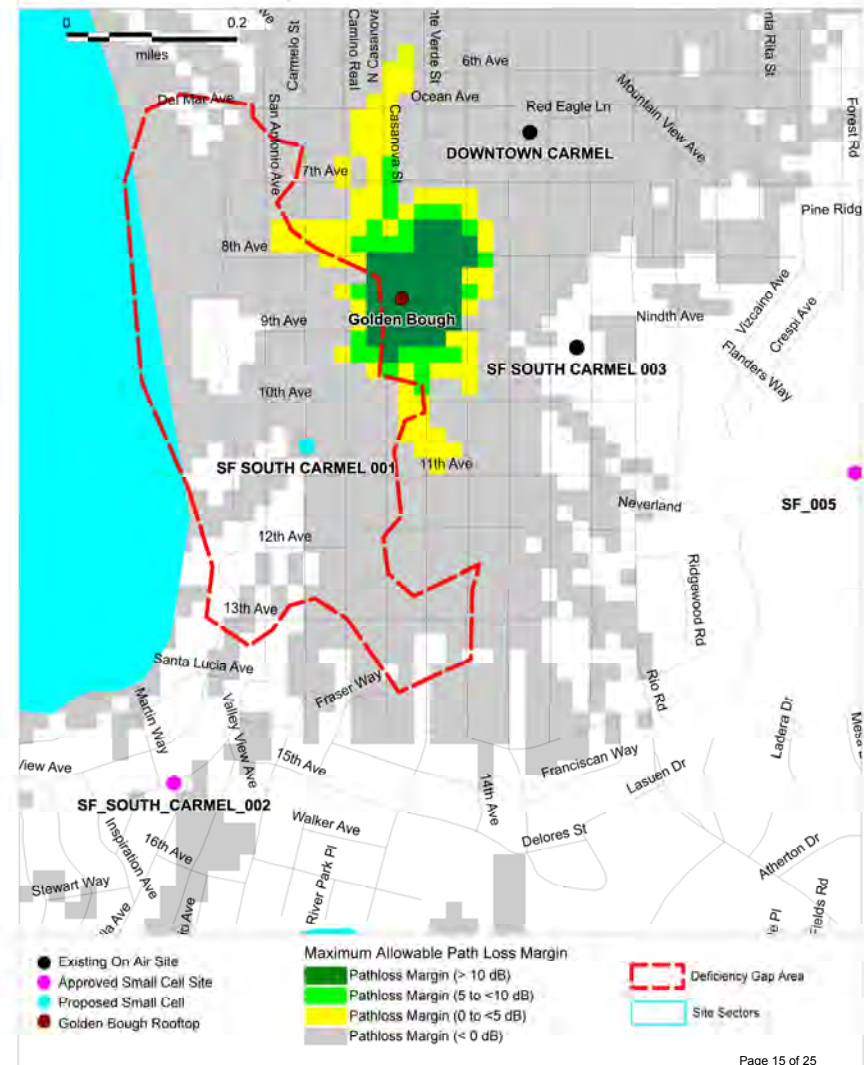
Comparable modeling under C-Band using identical assumptions demonstrates consistent relative behavior; therefore, redundant frequency-specific exhibits are not included.

EXHIBIT B - PATH LOSS COMPARISON SF-001 VS GOLDEN BOUGH OMNI-EQUIVALENT

Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration
Omni-Equivalent Gain and Tilt Parameters



5.6 Long-Range Projection Characteristics – Golden Bough Rooftop

When modeled using a sectorized rooftop configuration with low electrical downtilt (0–2 degrees), the Golden Bough location exhibits extended line-of-sight propagation toward the northwest over open water.

Open-water paths introduce minimal clutter attenuation and therefore allow signals to propagate efficiently over extended distances. Under low-downtilt conditions, modeled signal strength persists well beyond the intended residential service area.

Extended projection of this nature is inconsistent with proximity-based small-cell design, which is intended to localize coverage within the immediate service gap area. Excessive projection increases the potential for:

- Unintended service area expansion;
- Overlapping coverage with distant cells; and
- Reduced control over dominant serving boundaries.

To limit long-range projection and concentrate coverage within the intended residential area, increased electrical downtilt is required.

Exhibit C presents a line-of-sight profile comparison of the Golden Bough rooftop under 2° and 8° electrical downtilt configurations, illustrating the corresponding gap in propagation geometry.

Under a 2° electrical downtilt configuration, the antenna's upper radiation lobe projects outward at a shallow angle. In the northwest direction, there are no terrain obstructions and the signal travels over open water, where there is very little natural attenuation. As a result, free-space calculations incorporating antenna gain show that the signal level remains approximately –76 dBm at a distance of two miles from the rooftop.

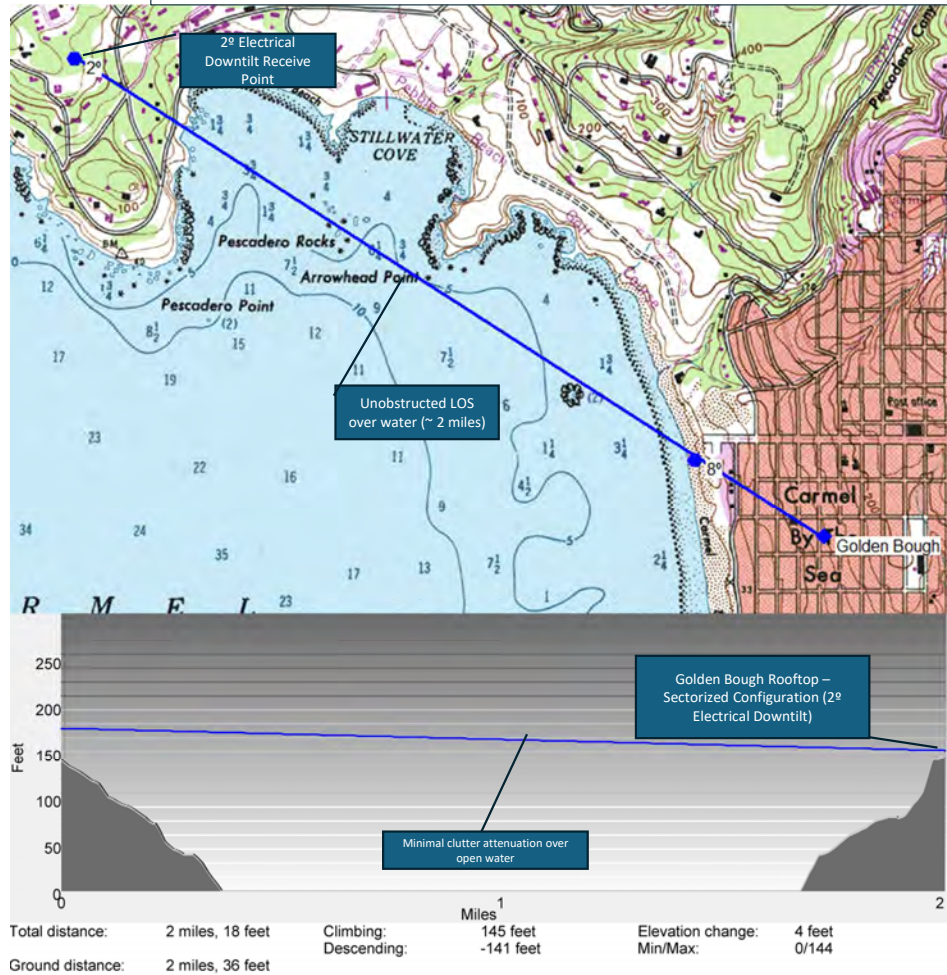
A signal at –76 dBm is strong enough to influence device selection and serving boundaries well beyond the intended residential service area. In practical terms, this means the rooftop would project energy far outside the localized service gap it is intended to address.

When electrical downtilt is increased to 8°, the signal at that same two-mile location drops to approximately –94 dBm; an 18 dB reduction. An 18 dB decrease represents more than a sixtyfold reduction in received signal power. While this higher downtilt improves containment of the signal and reduces extended projection, it does not uniformly improve localized coverage within the service gap area.

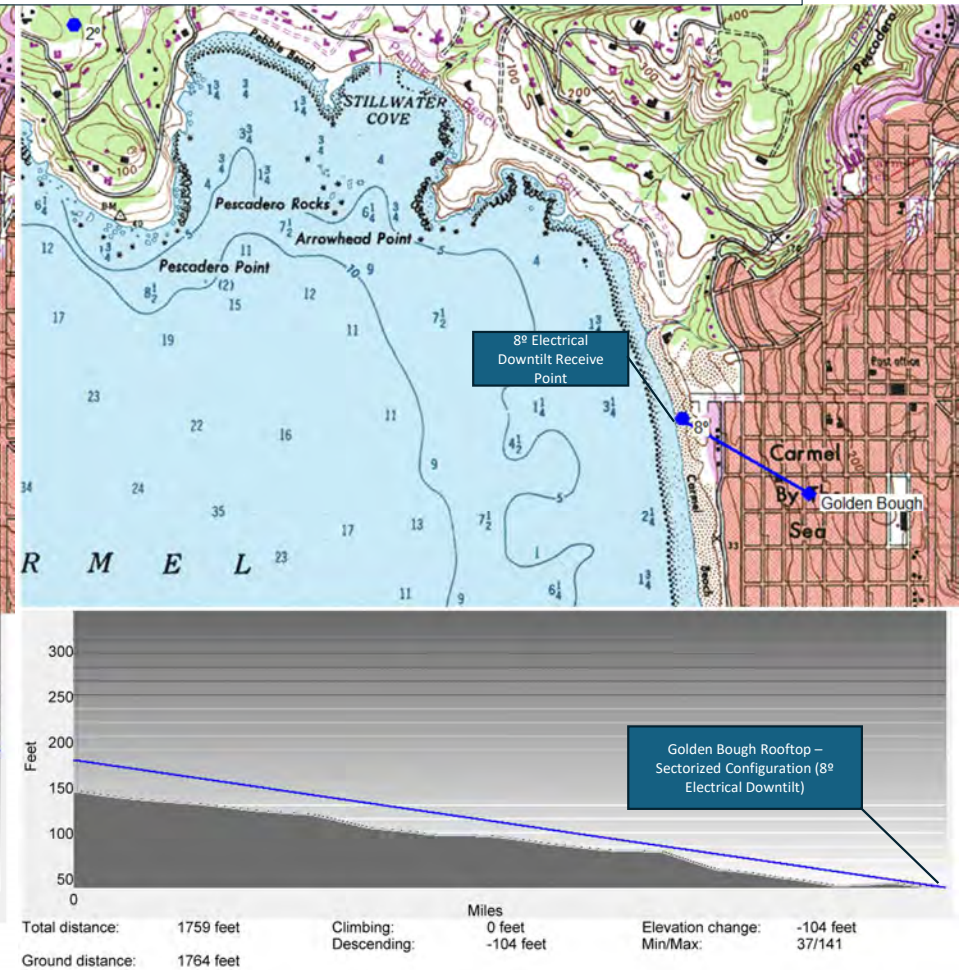
In this specific terrain environment, the Golden Bough rooftop is elevated relative to portions of the service area but not centrally positioned within it. Increasing downtilt redirects energy downward; however, due to the rooftop's position near the edge of the service gap and the downward terrain profile toward the water, portions of the service area fall outside the strongest portion of the vertical radiation pattern. This results in uneven margin and localized areas where uplink-limited performance remains constrained despite increased downtilt.

Accordingly, the Golden Bough rooftop presents a configuration tradeoff: lower downtilt produces excessive projection beyond the intended area, while higher downtilt improves containment but does not produce continuous positive margin throughout the documented service gap under the applied design criteria.

Exhibit C – Line-of-Sight Profile – Golden Bough Rooftop – Electrical Downtilt Sensitivity (2° vs. 8°)



Golden Bough Rooftop (2° Downtilt Configuration)
Unobstructed Over-Water Propagation Path (~ 2 Miles)



Golden Bough Rooftop (8° Downtilt Configuration)
Reduced Long-Range Projection; Localized Ground Intercept

5.7 Antenna Downtilt Sensitivity – Uplink-Limited Performance Impact

To quantify the service impact of downtilt selection, additional uplink-limited path loss modeling was performed for the Golden Bough rooftop under two electrical downtilt conditions: 2° and 8°, using identical MAPL (127 dB) assumptions and propagation parameters.

Under 2° electrical downtilt, extended propagation persists toward the northwest, consistent with the geometric behavior described in Section 5.6. While measurable signal is present within portions of the service area, the configuration does not maintain positive uplink margin within the central portion of the documented deficiency service gap area.

Specifically, the area where drive testing previously measured degraded SINR values corresponds to modeled path loss exceeding the 127 dB uplink-limited threshold, resulting in <0 dB margin. In such conditions, the Golden Bough configuration would not be expected to establish a dominant serving signal within that portion of the service gap area.

Under 8° electrical downtilt, long-range projection toward the northwest is reduced, and modeled signal containment improves relative to the 2° configuration. However, uplink-limited modeling indicates that margin within portions of the central deficiency service gap area remains constrained.

Specifically, while certain areas previously modeled below threshold under the 2° configuration improve slightly, the resulting uplink margin within much of the service gap area is limited to approximately 0 to <5 dB. Margin within this range provides minimal tolerance for indoor attenuation, terrain variability, or routine environmental fluctuation and may not establish a consistently dominant serving condition.

In addition, modeling along portions south of 11th Avenue up to the southern edge of the deficiency area indicates path loss exceeding the 127 dB threshold, resulting in negative uplink margin in those locations. Such conditions suggest that even with increased downtilt, the Golden Bough rooftop configuration does not provide continuous positive margin throughout the intended service gap area and may require additional network densification to address remaining sub-threshold areas.

Exhibits D and E present the comparative uplink-limited path loss results for the Golden Bough rooftop under 2° and 8° electrical downtilt configurations.

In addition to the modeled geometric and uplink-margin limitations, field inspection confirms the presence of mature vegetation located within close proximity to the potential antenna mounting area in the southwestern direction on the Golden Bough rooftop. The propagation modeling performed herein utilized standard clutter assumptions and **did not** incorporate discrete near-field foliage obstruction at the antenna aperture.

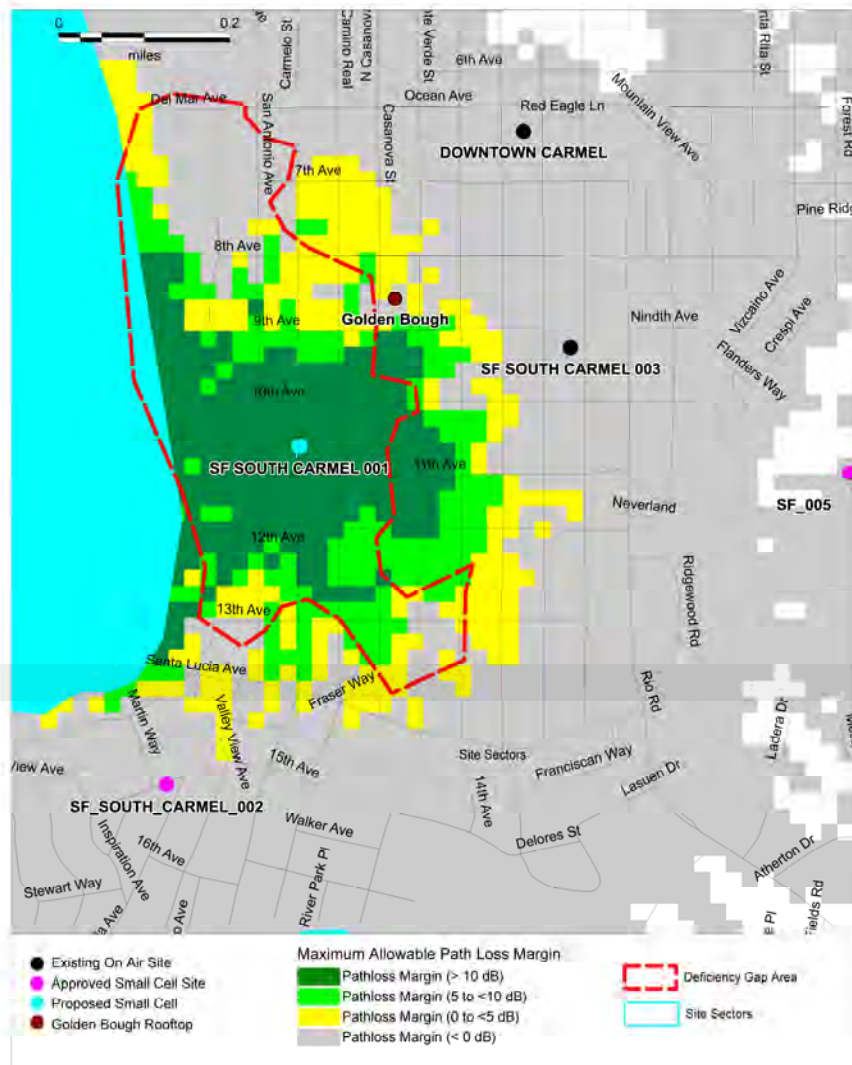
Close-in vegetation within the primary radiation path can introduce additional attenuation, multipath variability, and time-varying signal fluctuation that are not fully captured in

generalized propagation modeling. Even with selective tree trimming, residual foliage and seasonal regrowth may materially affect signal stability in the immediate service direction.

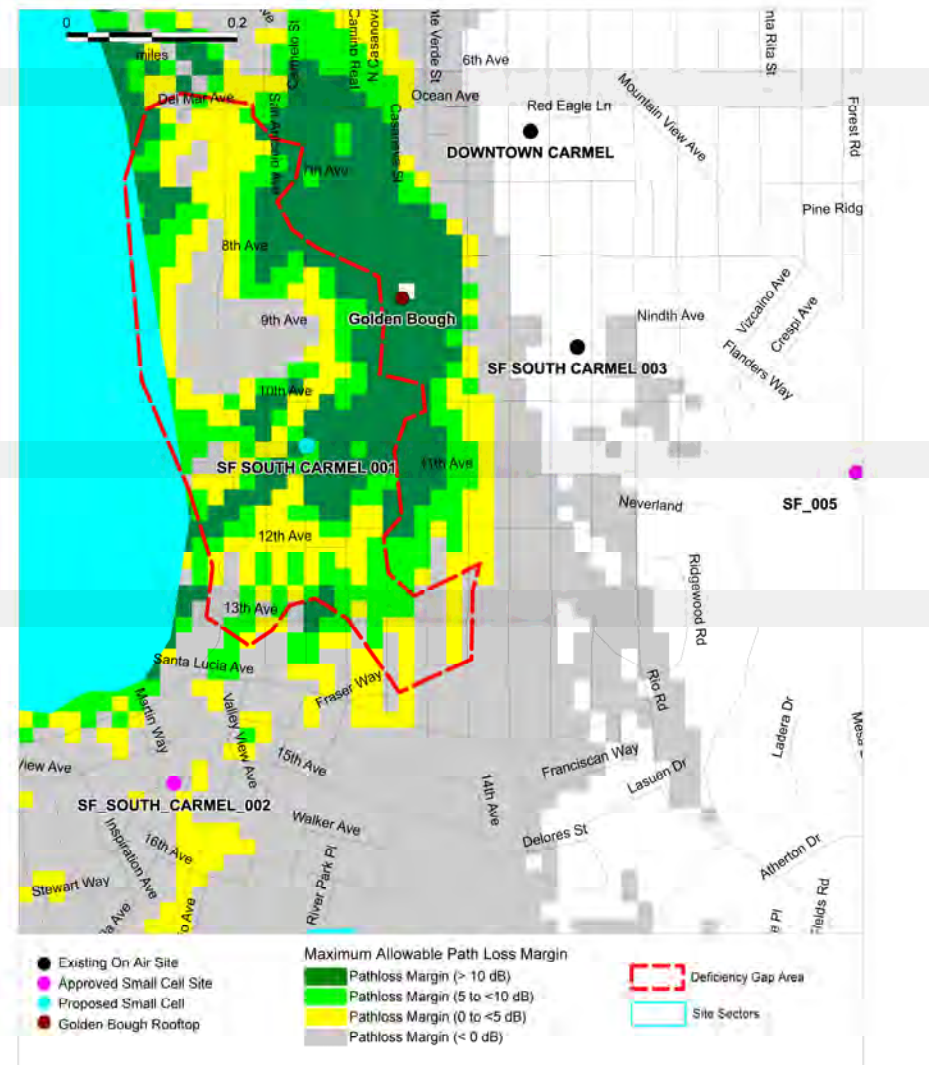
Accordingly, real-world performance from the Golden Bough rooftop would reasonably be expected to be more variable than reflected in the idealized modeling results presented above.

The modeling demonstrates that tilt adjustment at the Golden Bough location produces a performance tradeoff: lower tilt results in extended projection, while higher tilt reduces projection but does not simultaneously achieve controlled projection and continuous positive uplink margin across the documented service gap area.

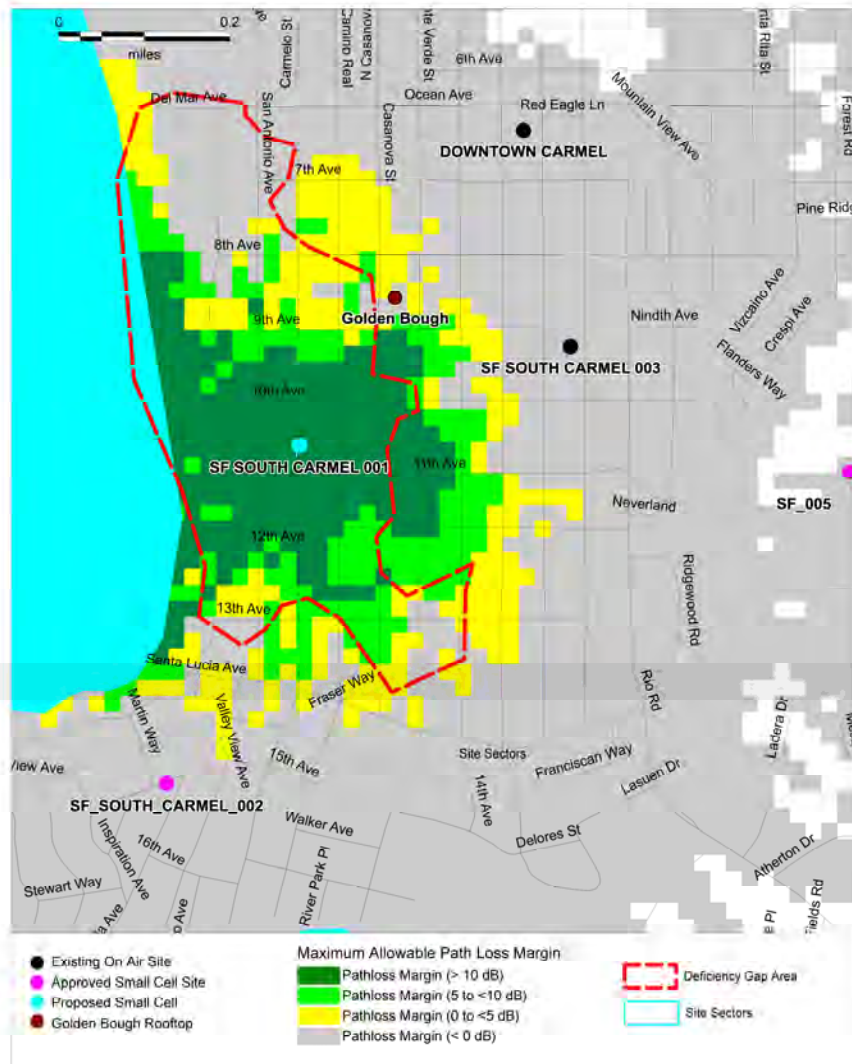
Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



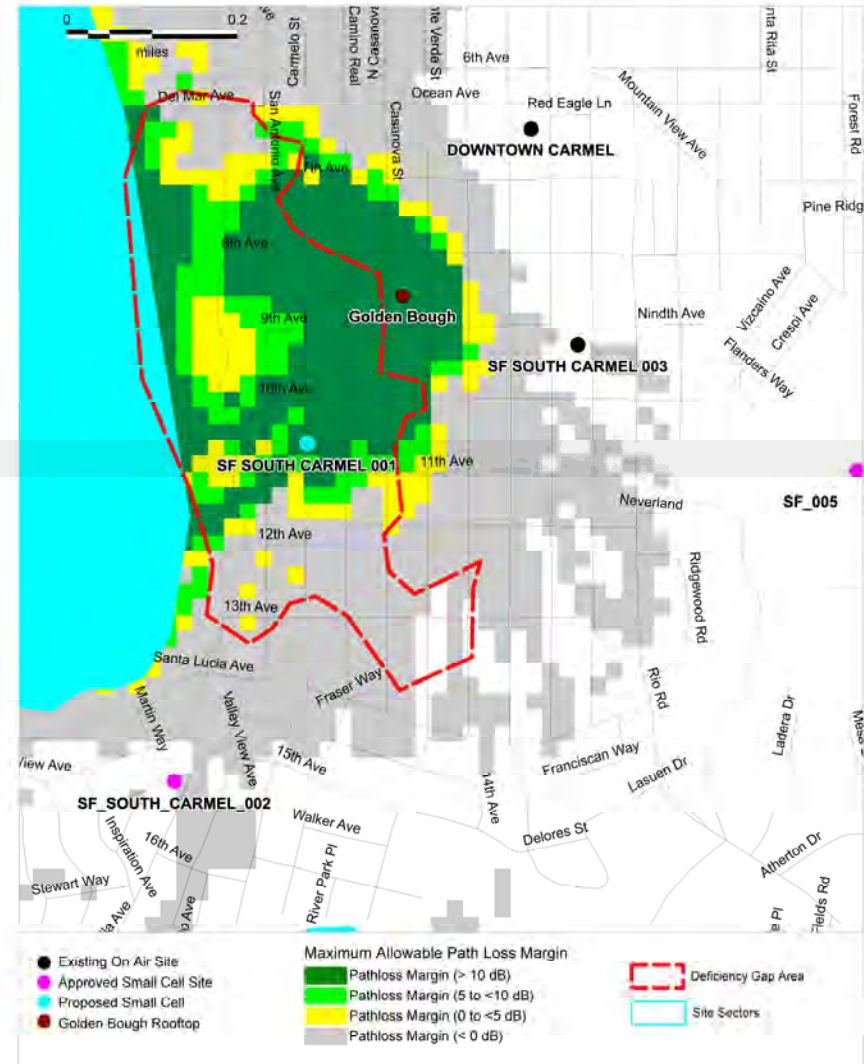
Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration - 2° Electrical Downtilt



Proposed SF-001 - AWS - Uplink-Limited Path Loss (127 dB)
Omnidirectional Small-Cell Configuration



Golden Bough Rooftop - AWS - Uplink-Limited Path Loss (127 dB)
Sectorized Rooftop Configuration - 8° Electrical Downtilt



5.8 Comparative Configuration Summary

The following table summarizes the comparative modeling results under identical uplink-limited MAPL (127 dB) assumptions and consistent propagation parameters.

Evaluation Criterion	Proposed Small Cell (SF-001)	Golden Bough – Omni-Equivalent	Golden Bough – 2° Electrical Downtilt	Golden Bough – 8° Electrical Downtilt
Located within documented service gap area	Yes	No	No	No
Proximity-based coverage geometry	Yes	No	No	No
Maintains positive uplink margin across service gap area	Yes	No	No	No (service gap area margin limited to 0–<5 dB in central zone)
Central deficiency area margin	Positive	<0 dB (majority of service gap area)	<0 dB	0–<5 dB
Southern / 11th Ave margin	Positive	<0 dB	0–<5 dB	<0 dB
Long-range projection behavior	Localized	Limited coverage	Extended	Reduced
Sensitivity to downtilt adjustment	Low	N/A	High	High
Near-field vegetation influence	Minimal	Present	Present	Present
Indicates need for additional densification	No	Yes	Yes	Yes

5.9 Summary of Golden Bough Technical Evaluation

The expanded modeling and field evaluation demonstrate that the Golden Bough rooftop is constrained by geometric separation, configuration sensitivity, and physical site conditions that materially limit its ability to achieve the identified service objectives.

The rooftop is positioned outside the documented service gap area and therefore must rely on transmission distance rather than proximity-based coverage to serve the central service gap area.

Under an omni-equivalent configuration evaluated using a conservative uplink-limited MAPL threshold of 127 dB, modeling indicates that positive uplink margin is not maintained throughout the central deficiency area.

When configured with low electrical downtilt (2°), the rooftop produces extended line-of-sight projection over open water while still failing to establish consistent positive margin within the central portion of the documented service gap. Increasing electrical downtilt (8°) reduces long-range projection; however, uplink margin within the service gap area becomes constrained to minimal levels (approximately 0 to <5 dB), and certain portions of the southern and eastern service area remain below threshold.

The modeling therefore reflects a configuration sensitivity in which reduced projection and adequate margin cannot be simultaneously achieved from the Golden Bough location under consistent uplink-limited design assumptions.

By contrast, the proposed SF-001 small-cell configuration is positioned within the service gap area and maintains positive uplink margin throughout the documented deficiency area without reliance on extended projection or aggressive downtilt adjustment.

Based on uniform modeling assumptions and consistent application of uplink-limited performance criteria, the engineering record does not support the Golden Bough rooftop as a technologically feasible alternative for achieving the documented service objectives within the identified deficiency area.

6. Conclusion

This supplemental evaluation applied uniform uplink-limited modeling criteria (127 dB MAPL), consistent propagation assumptions, and documented field conditions to assess whether the Golden Bough rooftop represents a technologically feasible alternative.

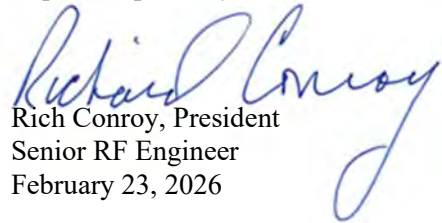
Under all evaluated configurations—including omni-equivalent, 2° electrical downtilt, and 8° electrical downtilt—the Golden Bough location does not maintain continuous positive uplink margin across the documented service gap area. Low-downtilt configurations result in extended projection beyond the intended residential area while failing to remediate the central deficiency zone. Increased downtilt reduces projection but constrains uplink margin within the service gap area and leaves portions of the southern service area below threshold.

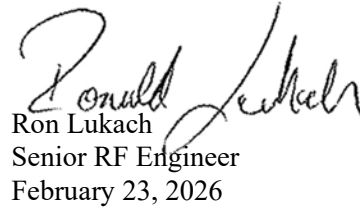
The modeling further reflects configuration sensitivity and geometric limitations inherent to the rooftop's position outside the service gap area. These constraints are not attributable to tunable parameters but to spatial separation and physical site conditions, including near-field vegetation.

By contrast, the proposed SF-001 small-cell facility is positioned within the documented service gap area and maintains positive uplink margin under the same modeling assumptions without reliance on extended projection or aggressive downtilt adjustment.

Based on consistent engineering criteria and comparative analysis, the Golden Bough rooftop does not represent a technologically feasible alternative for achieving the identified service objectives to the identified deficiency area. The proposed SF-001 small-cell configuration remains the technically appropriate solution supported by the engineering record.

Report Prepared by:


Rich Conroy, President
Senior RF Engineer
February 23, 2026


Ron Lukach
Senior RF Engineer
February 23, 2026

7. Appendix - Propagation Parameters

Carmel 127 dB Pathloss Model Parameters				
Site	SF S Carmel 001	Golden Bough	Golden Bough	Golden Bough
Latitude	36.549322	36.551884	36.551884	36.551884
Longitude	-121.926922	-121.924606	-121.924606	-121.924606
Site AMSL (ft)	82.3	156.9	156.9	156.9
AGL CL (ft)	47	34	34	34
Antenna Model	Omni_10DT	CUUT070X06Fxyz	NHHSS-65C-HGT-R3B_02DT	NHHSS-65C-HGT-R3B_08DT
Antenna Type	Omni	Clover	Directional	Directional
E Downtilt (degrees)	10	10	2	8
Azimuth (degrees)	360	220 340	220 300	220 300
Gain (dBi)	8	14	19.4	19.4
HBW (deg)	360	77	62	62
VBW (deg)	20	15	4.7	4.7
Dimensions	29.8" H x 14.6" D	24" H x 14.6" D	96"H x 11.9" W x 7.1" D	96"H x 11.9" W x 7.1" D
Clutter	1 sec 2021 USGS tuned to drive test data			
Terrain	2016 30m			
Frequency (MHz)	2100			
Model	COST-231 Hata			
ERP (dBm)	51.3	51.3	59.8	59.8

Verizon Wireless's Responses Volume 3

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2. Alternatives Continued	1

1. DESIGN CONTINUED

We were asked about impacts to the adjacent oak tree.

Verizon Wireless, the City, and a PG&E arborist met at the site on February 4, 2026, to determine what impacts, if any, would impact the adjacent tree. PG&E's arborist determined that due to the site's distance from the tree, it would not impact the root system. Furthermore, the replacement pole will be placed in the same hole as the existing pole, so there will be no additional impacts to the roots.

2. ALTERNATIVES CONTINUED

The Commission and project opponents inquired about the feasibility of a wireless facility at the Golden Bough.Technical Infeasibility

As Verizon Wireless has maintained for the duration of this application, the Golden Bough is not technically feasible and available alternative. To further explain why a rooftop wireless facility on the Golden Bough is not technically feasible PierCon Solutions prepared a new report, Radio Frequency Supplemental Report # 4, dated February 23, 2026. The report summarized the additional technical evaluations PierCon Solutions performed and concludes that the Golden Bough "does not represent a technologically feasible alternative for achieving the documented service objectives under consistent engineering criteria." Report at p. 4. PierCon included an appendix to the report that includes the parameters of their analysis so that it can be duplicated and analyzed by the City's expert consultant, CTC. Report at p. 25.

Practical Infeasibility

Sequoia Deployment Services met with the Golden Bough on February 4, 2026, to evaluate the property to investigate the feasibility of locating a wireless telecommunications facility on the property that would meet Verizon Wireless's needs. The site design concept was to build a site with one equipment cabinet, four remote radio units, four panel antennas, generator receptacle or lug box, electrical power fiber connections, and associated cabling. The antennas and rooftop equipment would be screened with a faux chimney.

The building is approximately 165 feet east to west with a hip roof running in the east-west direction. The east and west ends are a full story lower than the main roof, necessitating that the antennas go on the upper roof. The south portion of the roof is occupied by a large solar array. The east end of the building is shorter than the west end since the property slopes down approximately 22 feet east to west. The main floor at the east end is below street level while the basement level at the west end is above street level.

The exterior of the property is entirely accessible to the public. The roof is only accessible with ladders and climbing equipment. PreVisualists, Inc. flew a drone with a camera to confirm roof conditions and potential surroundings from potential antenna locations. The coverage objective for the site is located west and southwest of the Golden Bough property, which requires antennas with views in those directions without immediate obstructions.



Verizon Wireless discussed height restrictions with the Planning Department prior to the visit, and they noted a ten-foot height limit above the top of the roof. This restriction limits antenna placement to the highest point of the roof near the west end for two reasons.

First, if the antennas were placed easterly on the building, the roof would interfere with the antennas oriented west. This location would diminish the effectiveness of this sector. Moving east also requires that any southwest or south oriented sector would be low compared to the level of the roof resulting in interference from the large solar array.

The second issue with placement off the west end of the roof is structural and equipment conflict. The west end of the roof is situated over a wall that extends backstage to the ground. This wall would support any loads through the building to the ground. This location is also accessible with cabling from below at the very back of the theater which already has utilities routed in this area and would not interfere with theater operations. The

rest of the upper roof is an approximately 55-foot unsupported span north to south over the theater and stage area which already supports considerable stage equipment and the ceiling inside the building. This area is intensely used with cables, supports, HVAC ducting and a central catwalk running most of the upper attic space. It would be difficult to route cabling from equipment below to this central part of the roof without interfering with the theater equipment.

Since that site visit, Golden Bough has requested that the antennas be placed at the north edge of the building. To accommodate this request, Verizon Wireless would have to install a much taller antenna structure. The structure would need to be 18 feet tall above the roof to maintain the same antenna elevation, where the height limit is ten feet above the roof. However, antennas at that location would likely have to be even taller.

Under either design, a ground cabinet is required to house fiber equipment. Due to the configuration of the available space and its uses inside the building, the best place to locate the cabinet is outside. The cabinet would be attached to the south wall of the building above where a trash dumpster is located.

While a wireless facility may be technically constructable at Golden Bough, it would not meet the Verizon Wireless's needs. Furthermore, in addition to requesting that the wireless facility be located at the north edge of the roof, the Golden Bough has also expressed a desire to expand its solar panel array. In addition to occupying roof space, solar panel arrays cause interference with wireless signals (passive intermodulation), causing network disruption. Finally, it is not clear that Golden Bough would even lease its property to Verizon Wireless. It has expressed concerns over interference and impacts to their operations.

Increased Costs

In terms of costs, construction of a wireless facility on the Golden Bough roof, even if it were possible, would run at least three to four times as the proposed facility. Because the Golden Bough is not a technically feasible alternative for Verizon Wireless, it has not negotiated a lease with the theater. However, private property rent is generally orders of magnitude greater than the rent associated with a Joint Pole Association pole. Furthermore, maintenance costs associated with a rooftop facility tend to be higher as well. The Golden Bough has also indicated that they may potentially request accommodations associated with their audio and visual equipment, which would further drive up the costs.

Historic Resource Impacts

The proposed pole is adjacent to a home designated as a Criteria 3 historic resource on the City's Inventory of Historic Resources.¹ However, the pole itself is located within the public right-of-way. Due to its relatively small physical presence, the proposed wireless facility would have minimal visual impact on the adjacent home. The pole itself is not a protected historic resource.

The proposed alternative structure, Golden Bough, is designated as a Criteria 1 historic resource on the City's Inventory of Historic Resources, which is a more protected designation than Criteria 3. A wireless facility proposed on the Golden Bough would require a Section 106 review, including completion and submission of Department of Parks and Recreation ("DPR") forms to the California State Historic Preservation Office ("SHPO"). The Golden Bough is historic, in contrast to the pole in the public right-of-way. Based on the

¹ Available at: https://ci.carmel.ca.us/sites/main/files/carmel_inventory_of_historic_resources_v11.2024.pdf

structure types and the footprint associated with each option, the proposed stealth antenna on the pole would have less impact on historic resources in the area than a rooftop wireless facility on the Golden Bough.

[Please find linked here the Staff Report from the February 10, 2026 Planning Commission Meeting for DR 25313 & UP 25314 \(Verizon Sequoia Deployment\).](#)

2/10/2026 Staff Report attachments

1. [Attachment 1 – Resolution Approval](#)
2. [Attachment 2 – Resolution Denial](#)
3. [Attachment 3 – Project Plans](#)
4. [Attachment 4 – CTC Report](#)
5. [Attachment 5 – PierCon Supplemental Report 2](#)
6. [Attachment 6 – VzW Response Volume 1](#)
7. [Attachment 7 – VzW Response Volume 2](#)
8. [Attachment 8 – Strauss Letter](#)
9. [Attachment 9 – Previous Report and Reference Materials](#)

[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](#)

**Carmel-
by-the-Sea**

Jacob Olander <jolander@ci.carmel.ca.us>

Fwd: Confirmation of Interest – Verizon Installation at Golden Bough Playhouse

Brandon Swanson <bswanson@ci.carmel.ca.us>

Wed, Feb 25, 2026 at 4:16 PM

To: Anna Ginette <aginette@ci.carmel.ca.us>, Jacob Olander <jolander@cbts.us>, Gail Karish <gail.karish@bbklaw.com>, "Pierik, Brian A." <BPierik@bwsllaw.com>

Here ya go...

Take care,

-Brandon

Brandon Swanson [he, him, his]**Acting City Administrator**

City of Carmel-by-the-Sea

(831) 620-2024



----- Forwarded message -----

From: **STEPHEN MOORER** <smatprt@aol.com>

Date: Wed, Feb 25, 2026 at 2:22 PM

Subject: Confirmation of Interest – Verizon Installation at Golden Bough Playhouse

To: Brandon Swanson <bswanson@ci.carmel.ca.us>

External Sender - From: (STEPHEN MOORER <smatprt@aol.com>)

This message came from outside your organization.

Hi Brandon,

This email is to confirm Pacific Repertory Theatre's interest in having a Verizon telecommunications installation placed on the roof of the Golden Bough Playhouse, subject to mutually agreeable lease terms.

We look forward to continuing the conversation, when appropriate.

Best,

Stephen Moorer

Executive Director

Pacific Repertory Theatre

Sent from 9 to 5 ~ what a way to make a living!