



*STANFORD UNIVERSITY
UNIVERSITY INFORMATION TECHNOLOGIES (UIT)
LETTER OF TRANSMITTAL*

DATE: June 28, 2024

TO: Charu Ahluwalia & Buyan Batbaatar, SCC Planning Office

FROM: Erich Snow, UIT & Sharon James, Crown Castle

SUBJECT: ASA Incomplete Letter Response PROJ.: RAN 30- New Cell tower

WE ARE SENDING YOU:

No. of Copies	File Name	Description of Documents
1	Correspondence	Transmittal and Response to Incomplete letter - 1
1	Application Documents	Updated Master Application Form -1
1	Application Documents	EME Compliance -2
1	Application Documents	Photo Sims -1

THESE ARE TRANSMITTED AS CHECKED BELOW (X):

<input type="checkbox"/>	For your review and comments	<input checked="" type="checkbox"/>	For your approval
<input type="checkbox"/>	For your use	<input type="checkbox"/>	Approved as submitted
<input type="checkbox"/>	Approved as noted	<input type="checkbox"/>	Returned for corrections
<input type="checkbox"/>	As requested	<input type="checkbox"/>	Other

REMARKS: This transmittal letter is to accompany the attached response to the letter of incomplete received on 11-30-2023 for project PLN23-194.

This project proposes the installment of a new Monopine wireless facility in the Faculty Subdivision, with a height of 49' that will serve as an unmanned telecommunications facility.

The goal of this project is to provide improved cell phone coverage in areas where there is little to no coverage and at a time when many homes no longer have wired lines, and the residents rely on their cell phones for first responder calls as well as their everyday business and activities.

The facility has been designed to mitigate visual impacts to legible levels. Additionally, the proposed height is required to propagate the antenna signal at the lowest functional height.

Sharon Jame – Applicant
Crown Castle

Cc: Erich Snow, Ramya Subramanian

June 26, 2024

Banyu Batbaatar
County of Santa Clara
Department of Planning and Development
70 West Hedding Street
San Jose, CA 95110

Notice of **Incomplete/Additional Information Response** - **FILE NUMBER:** PLN23-194

SUBJECT: Architecture and Site Approval (ASA) for a New 49' Wireless
Telecommunication Facility

SITE LOCATION: 611 Mirada Av, Stanford (APN: 142-08-045) – RAN30

Ms. Batbaatar:

Please find inserted below in red, the responses to the Incomplete Items as well as the requested Additional Information, detailed in the November 30, 2023 letter from the Planning Department.

PLANNING – Incomplete Items

1. The proposed overall site plan (sheet A-1) is not complete, as it does not show the following:

a) Centerline, road width, rights-of-ways of Miranda Avenue;

Response: Sheet A-1 is revised to show the Centerline, road width, rights of ways on Miranda Avenue

b) Proposed setbacks measured from property lines;

Response: Sheet A-1 is revised to include the setbacks from the property lines.

c) Location, common name, diameter of existing trees located near improvements, measured 4.5 feet above grade, and dripline of those trees;

Response: Please see chart included in Sheet A-1 with the requested details of all existing tree located near proposed improvements.

See Sheet A-2 for dripline detail.

d) Complete boundary of the subject parcel.

Note: it appears that the overall site plan and enlarged site plan are incorrectly labeled, please clarify which plan is which and update them accordingly.

Response: Overall site plan is Sheet A.1. Sheet A1/1 is the Proposed Overall Site Plan. Both sheets now include the boundary of the subject parcel, 142-08-045.

2. Submit an existing overall site plan with the same scale as the proposed overall site plan. The plan shall show all existing structures on the parcel. The overall site plan needs to contain the entire parcel.

Response: Sheet A-1 Existing Overall Site Plan both now has the same scale as the Proposed Overall Site Plan – Sheet A-1.1. Both plan sheets now show the entire parcel and all existing structures on the parcel.

3. The submitted enlarged site plan (sheet A-2) is not complete. Please provide the following: a) Centerline, road width, rights-of-ways of Miranda Avenue;

Response: Sheet A-2 is revised to show the Centerline, road width, rights of ways on Miranda Avenue.

b) Proposed setbacks measured from property lines;

Response: Sheet A-2 is revised to now include the setbacks from the property lines.

c) Common name, diameter of existing trees located near improvements, measured 4.5 feet above grade, and dripline of those trees;

Sheet A-2 is revised and now shows drip line of each existing tree in the project area. It also includes a chart showing the location number, common name, diameter of existing trees located near improvement, measured 4.5 feet about grade, and the dripline measurement.

4. Provide a grading quantity table listing separately the proposed cut and proposed fill amounts for the tower installation, the grading for the access, the grading for the equipment pad(s) etcetera. If no grading is proposed, state “no grading is proposed” under the scope of work.

Response: The Project Description on Sheet T-1 has been revised to show No grading required. Sheet A-5 and A-6 also include the “No grading proposed” note.

5. If any landscaping is proposed, which does not seem to be the case looking at the submitted plans, provide a separate landscape plan identifying new landscaping components and, if applicable, any landscaping components proposed for removal.

Response: Sheet A-5 and A-6 now include the “No landscaping proposed” note. The Project Description on Sheet T-1 has been revised to show No landscaping proposed.

6. Provide the Construction and Logistics Plan, indicating laydown areas for contractor parking, storage of tools, materials, and stockpiles.

Response: Sheet A-2.1 Construction and Logistics Plan, now shows the laydown areas for the contractor parking, storage of tools, materials and stockpiles.

7. Provide color and/or material samples for the proposed pole, faux canopy, antennas, and fence enclosure. The color samples must be presented using the county-approved color board which can be found at the following URL: https://stgenpln.blob.core.windows.net/document/DR_ColorMatBoard.pdf. Ensure that all samples list the Light Reflectivity Value (LRV) and that LRV is 45 or less. The color shall be well-adapted design that exhibits consistency in tree size, character and color to that of the surrounding vegetation, that results in the design being well-adapted to local context.

Response: Color and/or material samples for the proposed pole, faux canopy, antennas, and fence enclosure are shown on sheet D-3. The needles proposed on the tree are non-reflective and the tree trunk will have a non-reflective bark coating as well. The fence enclosure is shown on page A-4 and A-6 and is denoted as “black”.

8. Provide the height information for the proposed ground cabinet.

Response: Proposed ground cabinet height is show as 6’5” as show on Sheet A-5.

9. The application form included in the submission is outdated. Please complete, sign, and submit the County Planning Master Application Form available at <https://stgenpln.blob.core.windows.net/document/MasterAppForm.pdf>. The most recent version of this form includes “Section III - Notice of Levine Act And County Of Santa Clara Lobbyist Ordinance”.

Response: An updated application is completed and will be uploaded.?

PLANNING - Additional Information

1. On Sheet T-1, the star icon in the location map does not appear to be where the facility will be placed. Please update the location map to match the actual location.

Response: The star icon on the location map on Sheet T-1 has been adjusted to better show the location of the proposed facility.

2. The subject parcel is zoned as R1S-n3 (Low-Density Campus Residential basic zoning district with Stanford University Upper San Juan combining district). Please update the zoning information in the plan set.

Response: Sheet T-1 Site Information has been updated to show the correct R1Sn3 Zoning designation.

3. Submit an arborist report with analysis regarding protection measures for surrounding trees. This information is required to ensure that trees adjacent to the project limit line can be protected in place and will not be damaged by the proposed construction.

Response: An arborist report, that will be uploaded, has been completed by Aesculus Arboricultural Consulting, and addresses expected effect on the trees (none to minor) as well as protection recommendations for pre-construction and during construction.

4. Pursuant to County Zoning Ordinance § 5.40.040, “*ASA may be granted if the Zoning Administrator makes*

A. Adequate traffic safety, on-site circulation, parking and loading areas, and insignificant effect of the development on traffic movement in the area;

B. Appearance of proposed site development and structures, including signs, will not be detrimental to the character of the surrounding neighborhood or zoning district;

C. Appearance and continued maintenance of proposed landscaping will not be detrimental to the character of the surrounding neighborhood or zoning district;

D. No significant, unmitigated adverse public health, safety and environmental effects of proposed development;

E. No adverse effect of the development on flood control, storm drainage, and surface water drainage;

F. Adequate existing and proposed fire protection improvements to serve the development;

G. No significant increase in noise levels;

H. Conformance with zoning standards, unless such standards are expressly eligible for modification by the Zoning Administrator as specified in the Zoning Ordinance;

I. Conformance with the general plan and any applicable area or specific plan, or, where applicable, city general plan conformance for property located within a city’s urban service area; and

J. Substantial conformance with the adopted “Guidelines for Architecture and Site Approval” and any other applicable guidelines adopted by the County.

a. As the proposed development is located close to two National Historic Registers (Lou Henry Hoover House and MacFarland House), submit the following for Staff to conduct further review and make recommendations on whether all required findings can be met:

i. Distance between the new project and each National Register.

Response: The distance from both National Historic Register buildings is show on Sheet A-1.1

ii. Average height of the surrounding trees on elevation

Response: The average height of the surrounding trees is estimated to be 27' based on the survey detail prepared by Lea & Braze Engineering Inc, which is included with the revised Plans. The elevation sheet does not show heights of the surrounding trees.

iii. Photo simulations from at least four different vantage points.

Response: Photo simulations from four different vantage points have been completed and will be uploaded as part of the project application submittal.

b. Based on the antenna height placement of 42' and Predicted Emission Levels in the RF report, it is not clear to what degree the General Population will be exposed to RF emissions. The report does not provide an overall and top-down view of RF emission levels, and an analysis of RF emissions in relation to the adjacent residences. Please revise the RF report to include the following for Staff to conduct further review:

i. Overall view of RF emission levels;

ii. Top-down view of RF emission levels;

iii. RF emissions exposure analysis to adjacent residences.

Response: The RF report has been revised. The report emphasizes the RF emission areas that are above FCC General Population (pedestrians) and Occupational RF (technicians, maintenance workers) limits. Also, antenna level plots are created to depict maximum-case exposure conditions at potential elevated work areas (page 7) Therefore, only blue, yellow and red RF emission plots/areas are being depicted in the report, all other areas being considered safe (green shaded areas), where the General Population RF emissions are significantly below the FCC recommended limits (see slide 8)

- Page 11 shows a vertical (from above) view, highlighting ONLY red, yellow and blue plots (see legend slide 8)
- Pages 12, 13, 14 are showing the horizontal view, again highlighting ONLY red, yellow and blue plots (see legend slide 8)
- The green (safe) areas are not highlighted, but they are covering everything else except the red, yellow and blue areas

City of Palo Alto Comments

5. Clarify the shut-down procedures/plan for this facility when maintenance is needed on surrounding trees as the General Population levels of Radio Frequency (RF) exposure may extend into the surrounding canopy. The plan shall be developed to protect maintenance workers via signage or agreed-upon shut-down procedures any time work happens near the facility at the antenna level.

Response: The RF report provided by Waterford Consulting (Page 15) includes details regarding FCC and OSHA safety guidelines. Including required signage with a phone number included for the shutdown of the site while work is being performed. (800-638-2822).

6. The elevation drawing (sheet A-5) appears to indicate that the faux canopy will oscillate from top to bottom. Staff found that oscillation hinders the installation's ability to properly blend into its surroundings where a pyramidal shape looks more natural.

Response: The tree has been redesigned to include a pyramidal design. See Sheet A-5.

7. On sheet A-3, the proposed antennas already appear to be poking out of the proposed canopy which will serve to conceal the antennas. Staff recommends having either the canopy extend more forward from the antennas, or the antennas pulled closer to the monopole in order to better achieve the “screening objective”. In addition to that Staff recommends that the antennas either be painted to match the green color palette of the tree or have “socks” on them using faux pine materials to ensure the antennas don’t visibly stick out inside the tree.

Response: The antennas have been pulled in 6” closer to the pole and the faux tree limbs have been adjusted to better achieve the “screening objectives” The antennas will be painted to match the green color palette on the tree. See updated sheet A-3

This concludes Crowns Castles’ response to the November 30, 2023 letter of Incomplete and request for Additional information for project PLN23-194.

Please contact me for further information.

Regards,

Sharon James
Crown Castle Agent
408-426-6629

