



*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 32- 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 PLN23-195.

This project proposes the installment of a new Monopine wireless facility in the Faculty Subdivision, with a height of 49' 11" 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



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June 26, 2024

Banyu Batbaatar  
County of Santa Clara  
Department of Planning and Development  
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San Jose, CA 95110

Notice of **Incomplete/Additional Information Response - FILE NUMBER:** PLN23-195

**SUBJECT:** Architecture and Site Approval (ASA) for a New 49' 11" Wireless  
Telecommunication Facility

**SITE LOCATION:** 805 Raimundo Way, Stanford (APN: 142-21-084) – RAN32

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 Raimundo Way;

**Response: Sheet A-1 is revised to show the Centerline, road width, rights of ways on Raimundo Way.**

b) Centerline road width, rights of way of Stanford Avenue.

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

c) Proposed setbacks measured from property lines.

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

2. The submitted enlarged site plan (sheet A-2) is not complete. Please provide the following:

a) Centerline, road width, rights-of-ways of Raimundo Way;

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

b) Centerline, road width, rights-of-ways of Stanford Avenue.

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

c) Proposed setbacks measured from property lines;

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

d) 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-2 with the requested details of all existing trees located near proposed improvements.  
See Sheet A-2 for dripline detail.**

3. 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**

4. 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.**

5. 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.**

6. 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](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 as 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”.**

7. Provide the height information for the proposed cabinet

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

8. 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, it appears that the project description does not reflect the height information correctly. Please clarify and update the information accordingly.

**Response:** Sheet T-1 has been revised to show the correct height information or 49' 11" in all references to the height on the plan.

2. 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 Arborcultural Consulting, and addresses expected effect to the trees (none to minor) as well as protection recommendations for pre-construction and during construction..

3. The proposed 49'-11" tall wireless telecommunication facility is located along Stanford Avenue, submit the following for Staff to conduct further review and make recommendations on whether the proposed project complies with Stanford GUP policies:

a. Setback from Stanford Avenue;

**Response:** Sheet A1.1 provides measurements from the centerline that put the setback at approximately 60 feet.

b. Landscape plan for the proposed development;

**Response:** No new landscaping is proposed. See note as such on Sheets A-5 and A-6.

c. Statement of justification for the potential visual impact on Stanford Avenue

**Response** The facility has been designed to mitigate visual impacts to legible levels. The existing mature trees will screen the facility by integrating into the existing landscape and will be minimally visible as illustrated in View 4 the Photo Sims.

d. Statement of justification for the proposed height

**Response:** The proposed height is required to the propagate the antenna signal within the existing tree canopies while also using them to screen the facility from view. The facility is designed at the lowest functional height.

4. Pursuant to County Zoning Ordinance § 5.40.040, "ASA may be granted if the Zoning Administrator makes all of the following findings:

*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*

a. Submit the following for Staff to conduct further review and make recommendations on whether all required finding can be met.

i. Average height of the surrounding trees on elevation.

**Response:** The average height of the trees shown on the Survey conducted by Lea & Braze Engineering is 41'. The elevation did not provide heights of the surrounding trees.

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

**Response:** Photo simulations from four different vantage points are complete and will be part of the Application submittal.

b. Based on the antenna height placement of 47' and Predicted Emission Levels in the RF report, it is not clear to what degree the General Population will be exposed to RF emissions along the adjacent trail paths. The report does not provide an analysis of RF emissions in relation to the adjacent trail path. Based on the information that is provided on page #12, the RF emissions appear to be limited to an elevation of 40' above the ground (approximate). In addition to that, the proposed development is located close to Lucille M. Nixon Elementary School and Tolman playground. Please revise the RF report to include the following for Staff to conduct further review:

i. RF emissions exposure analysis to adjacent trail paths.

**Response:** A revised RF report now includes the adjacent trail paths (ground) in the exposure analysis.

All trail paths including the area right below the antennas at the pole base are safe (below 100% FCC limit). See pages 11-14 of the report where it is represented that only an area between 40-47' height has RF emissions over the 100% FCC limit.

ii. Exposure evaluation regarding the potential impacts on nearby school and playground;

**Response:** Based on the revised RF report there is no potential impact on the adjacent buildings, playground, school or trails all being located outside the highlighted RF emission plots and falling under the safe (green) zone shown on the map (see page 11).

#### 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 prepared by Waterford Consultants includes a recommended shutdown procedure and number to call for shut down (800-638-2822) as well as the OSHA recommended signage. See page 15.

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:** Sheet A-5 now has a pyramidal shape design for the proposed monopine.

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 on 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 PLN23-195. Please contact me for further information.

Sharon James  
Crown Castle Agent  
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