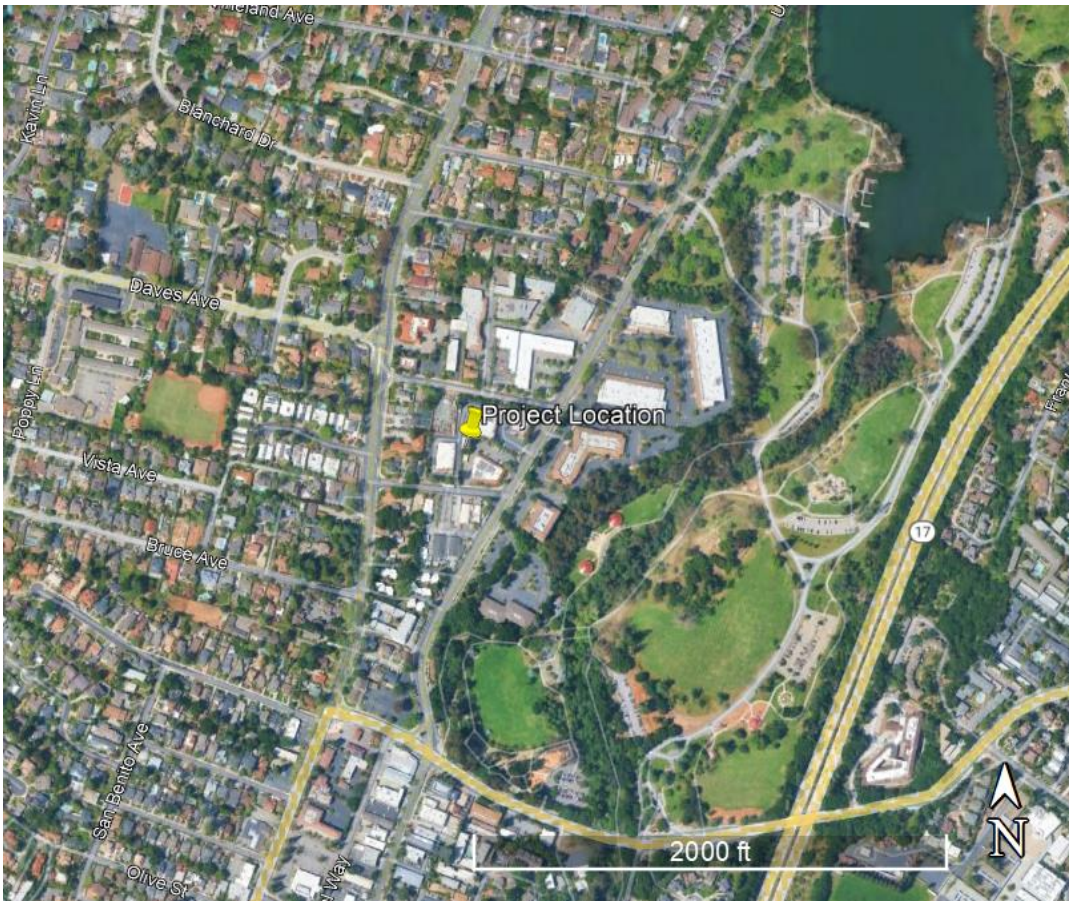
VERIZON WIRELESS
PROJECT DESCRIPTION AND JUSTIFICATION

Site Name: University Blossom Hill
Address: 17489 Shelburne Way, Los Gatos
APN: 529-11-052

INTRODUCTION & FACILITY DESCRIPTION

The demand for wireless and data services continues to grow across California. Access to the wireless network has become vital as individuals increasingly rely on handheld and mobile devices as their primary method of communication. Verizon Wireless is constantly working to improve its wireless network through industry-leading techniques and innovative solutions to respond to high levels of wireless network traffic and increased user demand. This proposal for a new wireless telecommunications facility is an essential part of the effort to continuously improve the Verizon network for existing and potential customers. The facility is designed to comply with all applicable rules and regulations.

This is a proposal for a new freestanding wireless facility, to provide improved coverage and capacity to the Town of Los Gatos and the City of Monte Sereno, in particular the neighborhoods surrounding University Avenue, Blossom Hill Road, and Winchester Boulevard. The proposed facility has been placed within a Light Industrial enclave off of University Avenue and is the least intrusive means for Verizon to close a significant gap in network coverage. It will be engineered to allow future additional carriers to further improve service in the area.



DESIGN AND LOCATION

The project is located on a 0.7 acre parcel on Shelburne Way, near the intersection of Shelburne Way and University Avenue. The parcel is zoned Commercial-Industrial (LM) and designated Light Industrial (LI) in the 2020 General Plan. The property, along with two adjacent parcels, is currently the site of a self-storage business. (The proposed facility has been sited so as not to interfere with the business's operations). Neighboring parcels to the north and east are also zoned Commercial-Industrial, while parcels to the west are zoned Office (O). To the south is Shelburne Way, across which are more Commercial-Industrial and Office zone parcels. The nearest residential zoned property line is over 500' to the south, while the nearest public right of way is Shelburne Way, at about 190' to the south. (The other roads bounding the block are Winchester Boulevard, about 370' to the west, University Avenue, about 250' to the southeast, and Farley Avenue, at about 220' to the north.)

Project Location

The proposed facility has been designed and located to minimize visual impacts. As noted above it, it has been placed about as far as is feasible from any public right of way, in a Light Industrial/Commercial enclave that is fairly atypical for the Town of Los Gatos in that it is well removed from the nearest residential zoned areas.

The facility has been designed at the minimum functioning height necessary to provide service, with the top of the antennas at 64' above ground level. The antennas would be installed on a 70' tall faux tree style monopole, often referred to as a "monopine." The monopine and supporting equipment would be installed within an existing self-storage building, with a hole cut in the roof for the monopine pole itself. (This is a common configuration for wireless facilities at self-facilities. They are excellent for placing wireless facilities away from residential areas, but the open space is generally given over to drive lanes so that customers may drive up to their storage units and therefore cannot be given over to wireless equipment.)

Verizon would have a 20' by 30' lease area within an existing storage building, the location of which is noted on the aerial photo on the preceding page with a yellow pin. Ground equipment would include two ground equipment cabinets, with room for a third, and a 30 kW diesel emergency backup generator, to be run when commercial power is interrupted and 15 minutes twice a month during normal business hours to keep it in good operating condition. For ventilation, one of the roll up steel gates on the existing storage would be replaced by a chain-link gate with vinyl privacy slats.

The faux tree was chosen as the best available stealthing option for the site, as the light industrial enclave is well screened by mature trees that the faux will be able to blend with when viewed from non-commercial-industrial properties and from the public right of way.

Locations of Views from Photos and Photo simulations

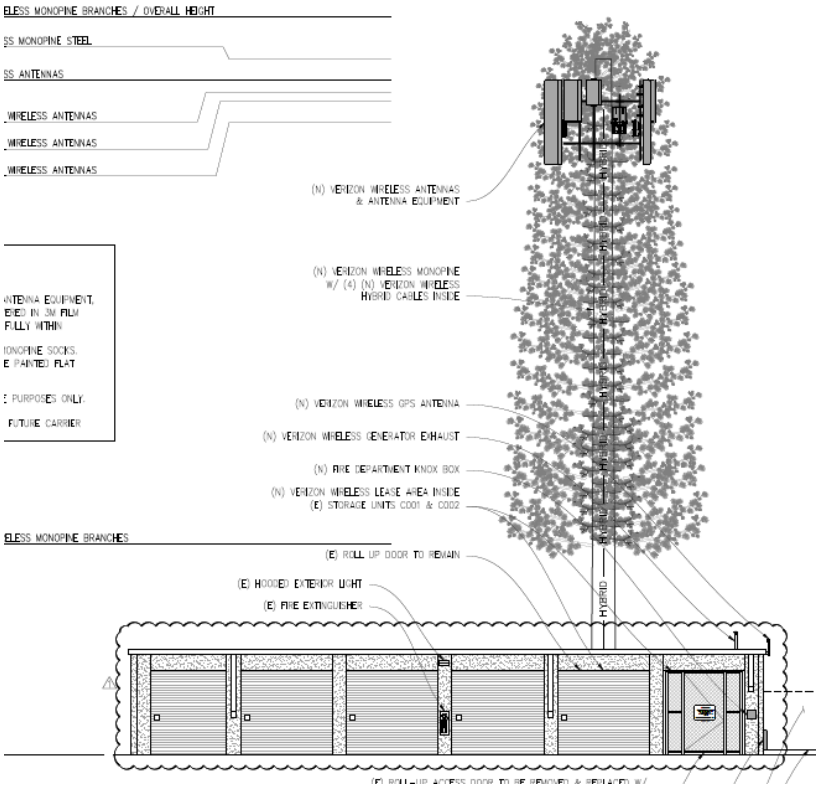
Site Name: University Blossom Hill
17489 Shelburne Way, Los Gatos (APN 529-11-052)
View from approximately 360' away on University Avenue, looking west towards the site

Site Name: University Blossom Hill
17489 Shelburne Way, Los Gatos (APN 529-11-052)
View from approximately 210' away on Shelburne Way, looking north towards the site

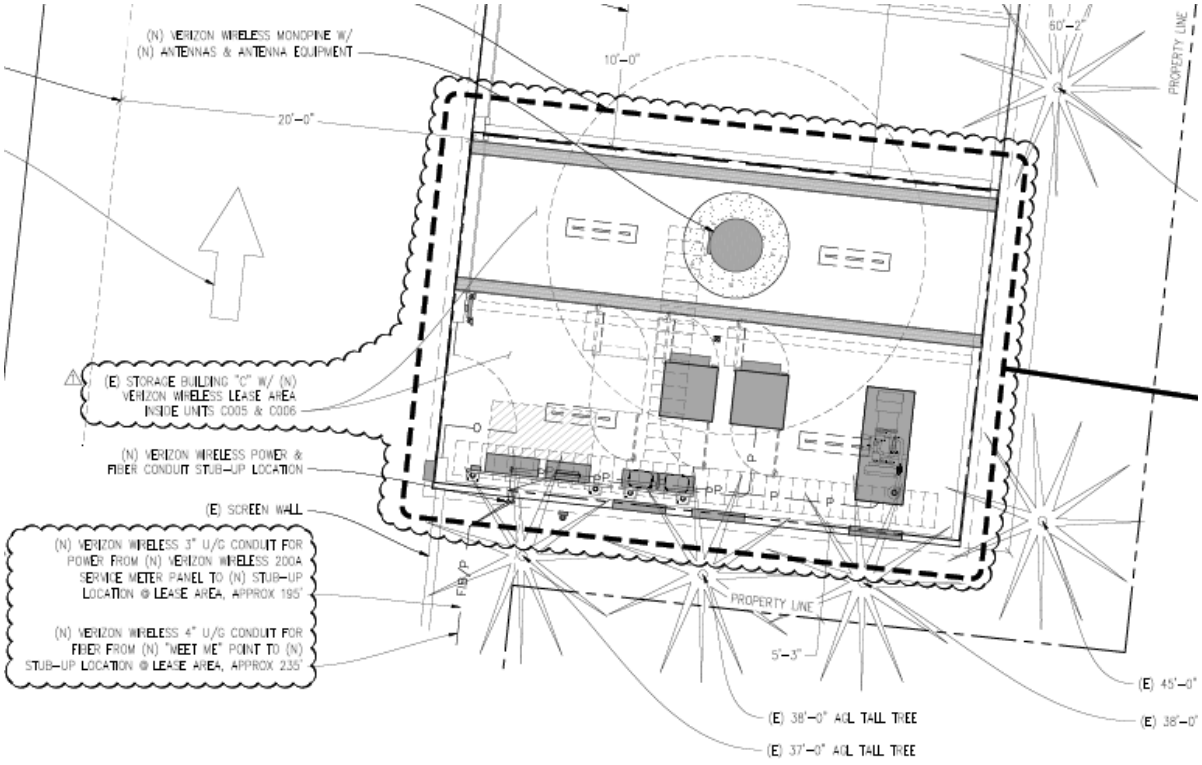
Site Name: University Blossom Hill
17489 Shelburne Way, Los Gatos (APN 529-11-052)
View from approximately 430' away on Winchester Boulevard, looking southeast towards the site

Site Name: University Blossom Hill
17489 Shelburne Way, Los Gatos (APN 529-11-052)

Details from the Elevation Drawings (Sheet A-3.1 of Sites Plans)



Details from Enlarged Site Plans (Sheet A-1.3), note existing building footprint



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DESCRIPTION OF COVERAGE AREA

The purpose of the facility is to improve wireless coverage and capacity for residents, businesses, and travelers in the Town of Los Gatos and the City of Monte Sereno. The project takes its name from University Avenue and Blossom Hill Road, two thoroughfares around which the existing gap in coverage is centered. The three-sector would provide 360 degrees of coverage to the surround. The facility would also provide relief for existing sites in the area. Overloaded sites result in reduced network throughput, which degrades network performance, leading to an increase in dropped calls, poor download speeds, and poor service.

The site is being proposed as the least intrusive means of filling this gap in service for the area.

Aerial of Approximate Coverage and Capacity Area

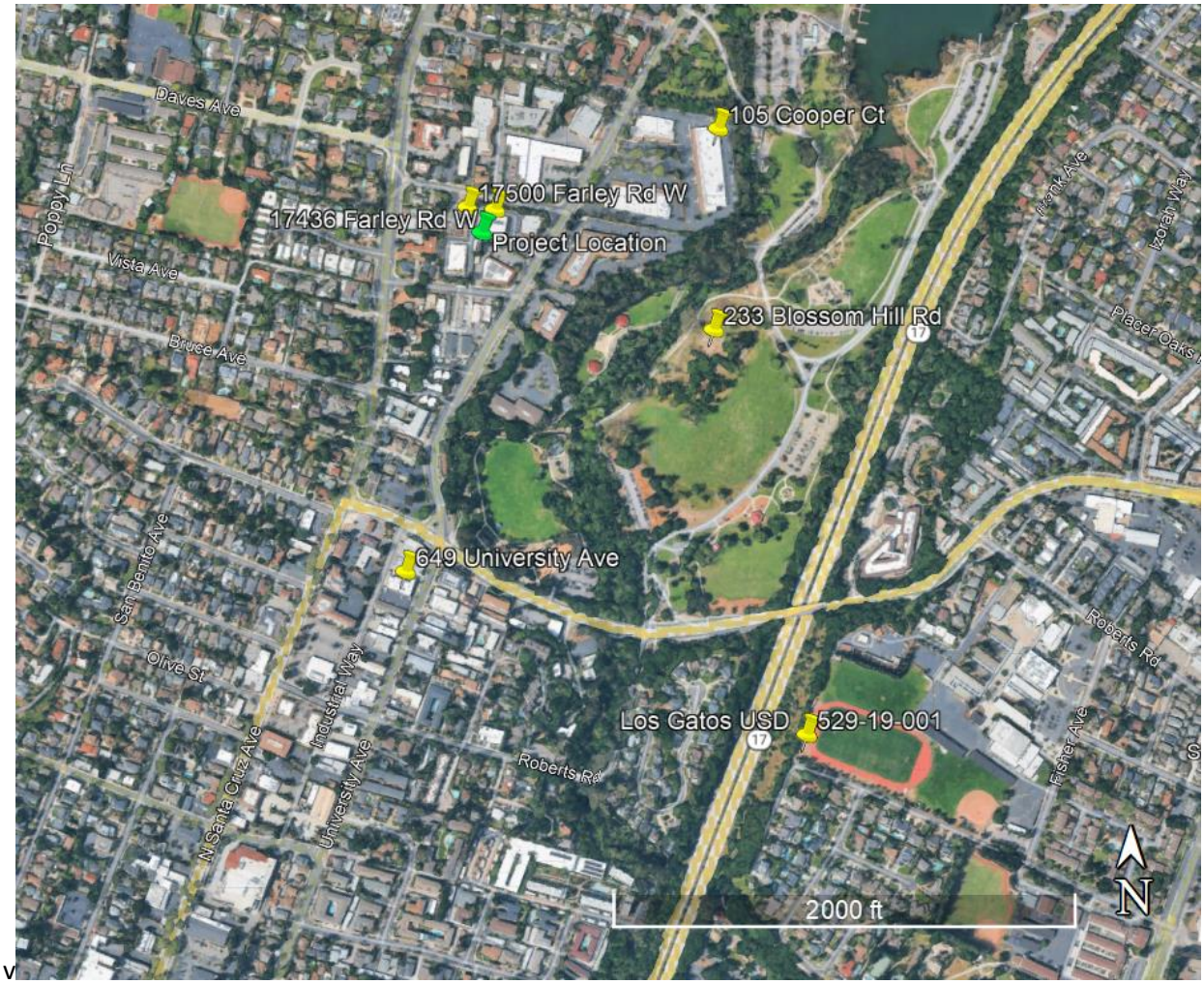
ALTERNATIVE SITES ANALYSIS

Selecting a location for a wireless telecommunications depends on many factors, including topography, zoning regulations, existing structures, co-location opportunities, available utilities, access, constructability, and the existence of a willing landlord. Each proposed site is unique and must be investigated and evaluated on its own terms.

In this instance, the biggest challenge was the pattern and density of development in the area, which is also what gave rise to the need for the proposed facility. Los Gatos and Monte Sereno are both overwhelmingly residential in character. Per the Los Gatos 2020 General Plan Table LU-1, the Town has 5,911 acres of Single Family Residential land uses, compared to only 164 acres of Commercial uses, 126 acres of Office uses, and 37 acres of light industrial uses. It was necessary to find an appropriate, non-residential location that was nonetheless capable of serving the residential areas that currently suffer from poor service.

An aerial photo depicting the locations of potential alternatives is below, followed by an accounting of each of these alternatives.

Aerial Photo of Alternative Locations



List of Alternatives Considered

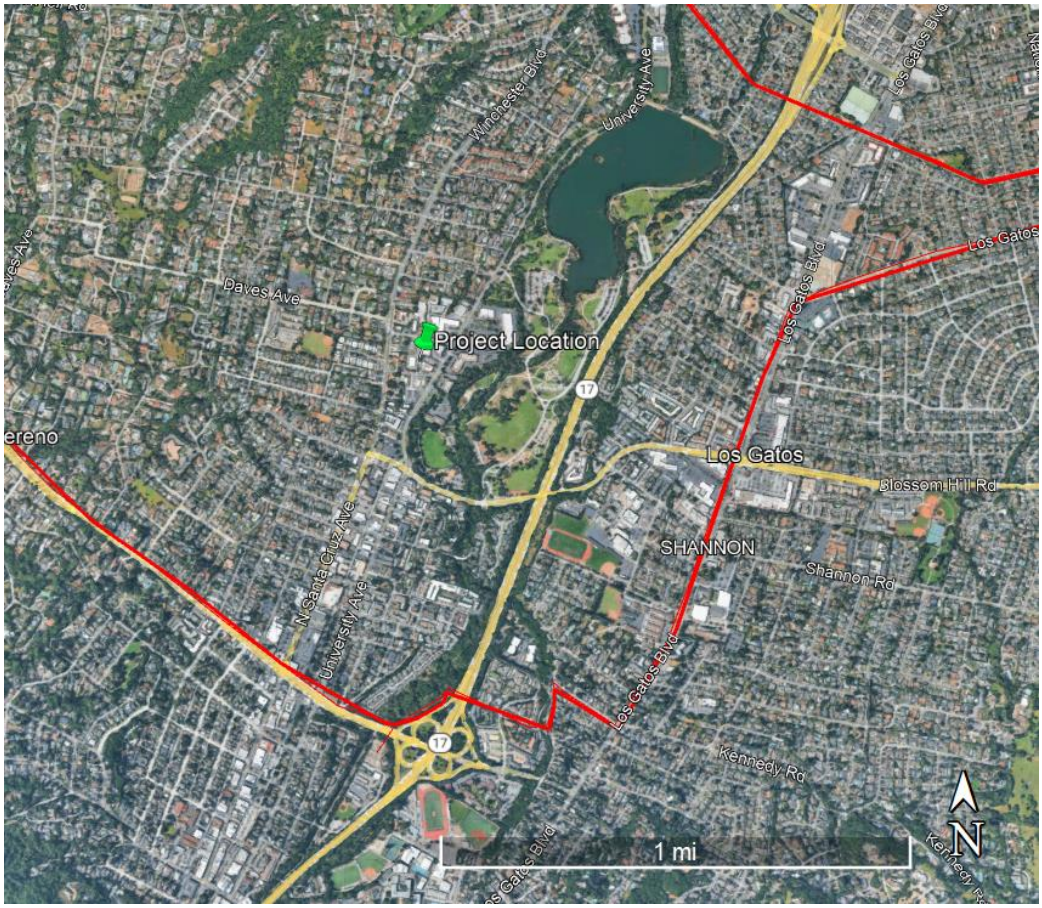
Colocations and Rooftops:

There are no viable colocations on buildings, existing wireless telecommunications facilities, or other structures capable of filling the gap in coverage. All non-residential buildings in the surrounding area are one to two stories, and the vast majority of residential buildings are as well. Transmission lines are too far away for a colocation on a transmission tower to be a viable option, and although there is one wireless telecommunications facility in the area, it is not colocatable.

- **649 University Avenue**: This is the site of the one existing wireless telecommunications facility in the area. It is a fairly unusual design, a lattice tower installed in the middle of a flat roofed building and supported by guy wires. There is no space on this facility for Verizon to collocate additional antennas at a new centerline, and this sort of tower cannot be extended. A colocation here therefore is not a viable means of filling the existing coverage gap. Additionally, this sort of unstealthed design is more visually intrusive than the proposed monopine.
- **105 Cooper Ct, Los Gatos:** This location is a rooftop in a business park. Verizon's RF engineer determined early in in reviewing this site than more height would be required, and a rooftop here would not be viable.
- **17436 Farley Road West, Los Gatos:** This location was another potential rooftop, this time on one of the other parcels that, along with the subject parcel, make up a self-storage facility. Verizon's RF engineer determined that there was not enough height to fill the coverage gap.

The 649 University Avenue roof-mounted lattice tower:

Transmission lines in the area depicted in red, project location in green:



Alternate Locations for a New Freestanding Facility:

- **105 Cooper Ct, Los Gatos:** Verizon's RF also evaluated a taller, freestanding facility at this location. The location was rejected due to being unable to fill the coverage gap.
- **233 Blossom Hill Rd, Los Gatos:** This parcel is better known as Vasona Lake County Park. As a scenic, recreational area, there would be number of potential issues with placing a cell tower – including the issue of a viable alternate location on a light industrial parcel – but as part of Verizon's due diligence, Verizon's RF engineer did review the technical viability of a potential site. It was determined not to be a viable location due to lower elevation.
- **APN 529-19-001, Los Gatos:** A Los Gatos Union School District owned parcel, this property is the site of Raymond J. Fisher Middle School. Verizon's RF determined that the location and elevation of the property meant that it was potentially from a technical standpoint. The District was contacted about the possibility of leasing space to Verizon but did not respond. In addition to lack of property owner interest, school sites have a number of additional challenges. While campuses are often large in terms of acreage, any wireless facility must be placed so as not to interfere with school buildings or sports fields. This generally means a location along the periphery of the property, or near maintenance facilities. In this instance, the only potential on the property would be in close proximity to nearby residences and therefore would be more visually intrusive than the proposed location.

The Raymond J. Fisher Middle School Campus, residential areas clouded in blue:

- **17500 Farley Road West, Los Gatos:** This is another Commercial-Industrial zoned parcel that is directly adjacent to the subject parcel. It was determined by Verizon's RF engineer to be technically suitable and capable of filling the gap in coverage. It is currently used as a storage yard for trucks and there are no existing buildings to place equipment inside. It would also be closer to the public right of way and not as well screened by trees and existing buildings as the proposed location. Additionally, the property owner did not respond to Verizon's leasing inquiries.

17500 Farley Road West:

Alternatives Analysis Conclusion

There is currently a significant gap in coverage in western Los Gatos. There are no viable colocations on existing wireless telecommunications facilities that are capable of filling this gap in coverage, nor are there any viable colocations on buildings or other structures such as transmission towers.

The vast majority of the area is residential properties that would not be suitable for a wireless telecommunications facility. Of the non-residential parcels, the majority were ruled out by Verizon's RF Engineer as technically unsuitable and unable to fill the gap in coverage. Of the handful of remaining locations, the proposed location and the proposed facility design is the least intrusive means of filling this significant gap in coverage in the area. It is further from residential areas and the public right of way, and the surrounding trees and buildings provide better screening and coverage than any viable alternatives. In addition, the facility has been designed to function at the minimum height needed to provide improved coverage to the surrounding area and managed to be proportionate to the surrounding trees.

There is no less intrusive alternative – this is the least intrusive means of filling the existing gap in coverage.

COMPLIANCE WITH TOWN OF LOS GATOS MUNICIPAL CODE REQUIREMENTS

The Town of Los Gatos has a Wireless Telecommunications Facilities ordinance beginning at Section 29.20.205 of the Town's Code of Ordinances and pursuant to that ordinance adopted Standards for Wireless Telecommunications Facilities on June 16, 2003.

Additionally, wireless telecommunications facilities are regulated by federal law, which places some constraints on discretionary review of wireless telecommunications facilities. Jurisdictions may not discriminate between technologies or service providers and are barred from issuing an effective prohibition on wireless service. A regulation becomes an effective prohibition when it has the effect of prohibiting even the least intrusive means of filling a gap in coverage. When that happens, a jurisdiction is obligated to waive the regulation in question to the extent necessary.

For the reasons below, the site does comply with Town of Los Gatos rules and regulations for wireless facilities. Verizon would also note, however, that this site is the least intrusive means of filling a gap in coverage in the area, as there is no viable, less intrusive means of filling the gap. To the extent any standard prohibited the facility, it would run afoul of Federal rules against effective prohibitions of service.

- **General Requirements (Sec: 29.20.209)**
    1. Compliance with General Plan and any other adopted land use plan. *The subject property is designated Light Industrial in the 2020 General Plan. The proposed use does not conflict with this designation.*
    2. Compliance with the California Environmental Quality Act**.** *The project complies with CEQA. It qualifies for a Class 3 Categorical Exemption, for new construction or conversion of small structures. A completed Environmental Questionnaire has been included with this application.*
    3. Compliance with the requirements of any other governmental agency with jurisdiction over the installation of telecommunications facilities. *Wireless Telecommunications Facilities are subject to FCC regulations. The Facility will comply with all FCC regulations*

and a RF-EME showing compliance with FCC RF-EME regulations has been included with this application.

4. Compliance with any applicable easements, restrictions, or land use approvals restricting development on any given parcel. *There are no development restrictions or easements restricting development on the parcel that conflict with the project. A title report has been included with this application.*
5. Compliance with the radio frequency emissions standards adopted by the Federal Communications Commission, which shall include any combined radiation levels produced by antennas located on the same parcel in addition to all antennas within a 100' distance of the proposed facility. *The Facility will comply with all FCC regulations and a RF-EME showing compliance with FCC RF-EME regulations has been included with this application. There are no other wireless antennas located on the parcel, or within 100' of the proposed facility.*
6. Compliance with the California Uniform Building Code and subject to the Town of Los Gatos building permit process. *The project will comply with the all applicable building codes and regulations. A building permit application will be submitted to the Town for review in accordance with the Town's building permit process.*
7. The telecommunications facility shall be an accessory use, secondary to the primary use on the parcel. *The facility will be an accessory use. The existing self-storage facility on the property will remain the primary use on the parcel.*
8. Any and all standards enacted pursuant to this article. *The facility complies with the Standards for Wireless Telecommunications Facilities enacted pursuant to this article. A point by point accounting of the standards has been provided below.*

- **Specific Siting and Design Requirements (Sec. 29.20.210)** *This section references any standards the Town many enact but not set forth any requirements itself. A point by point accounting of the proposed facility's compliance with the siting and design requirements included within the Town's Standards for Wireless Telecommunications Facilities is provided below.*

- **Standards for Wireless Telecommunications Facilities: Location Standards:**
    1. **Location Preferences** – Discouraged on Residential Zones, remaining zones listed in order of preference. *(The site is not zoned residential.*
        a. Co-located on an existing telecommunications structure or on a building roof or façade already containing approved antennas. *No such viable locations.*
        b. On existing buildings or structures. *No such viable location.*
        c. Town owned properties and other public or quasi-public facilities, such as fire stations, schools, or churches. *No such viable location.*
        d. Poles in the public right of way or in a public easement, including but not limited to PG&E towers or other communications towers, light poles, or existing flag poles. *No such viable location.*
        e. Commercial Zoned Properties. *The subject parcel is zoned Commercial-Industrial.*
        f. Any non-designated residential land use adopted in the General Plan. *This would be a lower preference than the subject parcel.*
    2. **Hillside Locations**: *This section is not applicable, as the project is not proposed on a hilltop location.*
    3. **Minimum Distance of Antenna and Facilities**: The guidelines set a minimum distance between wireless antennas and related facilities of three miles, but note that if this is not technically feasible, it may be documented in the alternative sites analysis. *Verizon*

has accordingly noted this requirement is not technically feasible – the network would be unable to serve the volume of existing users while abiding by this requirement.

- Standards for Wireless Telecommunications Facilities: Development Standards
    1. **Co-Locations**: *As the proposed facility is not a colocation, the only pertinent provision is the requirement in subsection (d) that any proposal that is not a colocation provide justification stating the reason a colocation has not been proposed, which has been done as part of the alternative sites analysis provided.*
    2. **Signage**: All wireless facilities shall provide identification either by sign, sticker, or placard that includes the most current phone number and emergency contact information for the wireless service provider. The sign information shall also include warnings and safety precautions for people nearing the equipment as may be required by an applicable FCC adopted standards, including RF symbols identified in ANSI C95.2-1982. All signage must be approved by the Community Development Director. Advertising signs are prohibited. *Verizon will comply with all signage requirements, including a toll free number to reach Verizon's 24 hour Network Operations Center (NOC). The location of the signage on the access gate has been depicted on the Sheet A-3.1 of the site plan, the elevations sheet. A sheet depicting all signs to be installed will be included with the building permit application. An RF-EME safety report reviewed and stamped by a 3rd party Professional Electrical Engineer has been enclosed as part of this application. No additional signage is required, as no areas accessible to the general public – including nearby rooftops – are in excess of the FCC's general public exposure limits. No advertising signage is proposed.*
    3. **Structural Standards:** All wireless facilities shall at all times comply with applicable requirements of the Uniform Building Code in effect at the time the permit is issued. *Verizon will comply with all UBC standards. Compliant structural engineering and a geotechnical report will be provided as part of a building permit submittal.*
    4. **Screening and Landscaping**: Wireless telecommunications facilities shall be installed in a manner that minimizes the impact to existing vegetation. Any damage to landscaping and/or vegetation shall be required to be restored. As appropriate, landscaping shall be used to provide visual screening of the proposed facility, related structures, and equipment. Landscaping is not limited to just screening of mechanical equipment. *There is no existing vegetation in the project area. The ground equipment and tower will be placed within an existing storage building. The ground equipment will be screened by walls and a gate – it would not be appropriate to add additional landscaping around the existing storage building, as it would interfere with the other access of other self-storage tenants on the property. In addition, the property and the neighboring Commercial-Industrial (LM) parcels are collectively screened from the public right of way by existing mature trees which the stealth faux tree will be able to blend with. Photo simulations depicting the faux tree have been provided.*

       Towers, monopoles and ground equipment shall be enclosed by a security fence of not less than six feet high and incorporate an anti-climbing device sufficient to protect from trespassing. Fence material and design shall be compatible with the image and aesthetics of the surrounding area and/or residential area and in no case is barbed wire or similar material allowed. Chain-link fencing is not appropriate unless it is entirely screened and maintained with approved landscaping. *As noted above, the tower and ground equipment will be surrounded by the existing walls of the existing storage building, which by their nature are compatible with the surrounding storage buildings on*

the property. As noted in the project description, one of the rollup metal gates of the existing storage building would be replaced by a chain-link gate with privacy slats, but it would face west, inward towards the other storage buildings on the property, which, along with existing trees, would screen it from view.

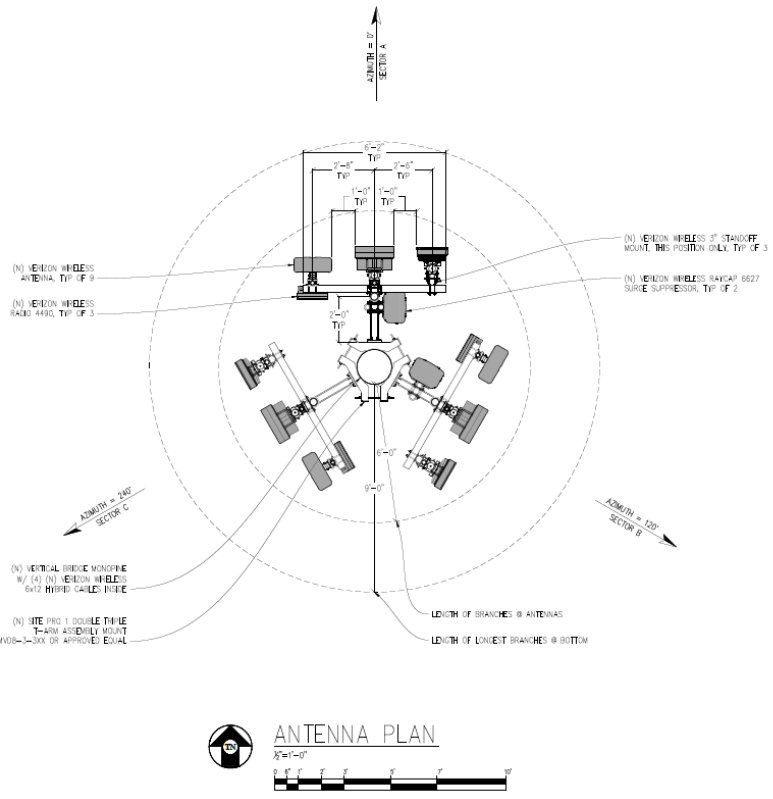
5. **Height:** Wireless facilities must be designed at the minimum functioning height based on "technical requirements of proposed antenna frequency and in consideration of the Town's objective to provide full service coverage." The subsections pertaining to freestanding facilities note that monopoles are limited to the minimum functional height. Where the minimal functioning height of a facility requires a height above the maximum height allowed by the underlying zone, a conditional use permit is required. *In this instance, the maximum height permitted under the code for the Commercial-Industrial (LM) zone is 35', while the minimum functioning for the facility would be 64' above ground level for the top of the antenna, plus the additional height needed for the stealth tapered faux tree "crown." Verizon is applying for a conditional use permit for the facility.*
6. **Setbacks:** Wireless facilities are required to meet the applicable setbacks for the underlying zone, with the decision making body having the discretion to require additional setbacks. Sites within 50' of a residential property line require a Conditional Use Permit. *The setbacks for the LM zone are 15' from the front, with no setbacks from the rear or sides if the property is not abutting a residential zone. In this instance, the property is not abutting a residential zone, nor is there a residential property line with 50' of the project location. (The nearest residential zoned lot line in Los Gatos appears to be over 500' south.) The closest neighboring parcel is another LM zoned parcel with an existing light industrial use. There is no aesthetic reason to require a larger setback, and other storage units on the property are either not suitable or unavailable.*
7. **Public Right-of-Way:** No portion of any wireless telecommunications facility may extend over the side, street, or other public right-of-way, whether ground mounted or building mounted, without an encroachment permit. *None of the tower or ground equipment extends into or over the public right of way. No access improvements are anticipated to be necessary. Verizon will apply for an encroachment permit for any utility work that needs to be done in the public right of way.*

- **Standards for Wireless Telecommunications Facilities: Design Standards**
    1. **Stealth Design:** Wireless telecommunications antennas, related facilities and structures shall incorporate architectural treatments and advanced industry screening techniques to mitigate visual impacts. Appropriate and innovative design solutions, stealth designs and locations that blend with the natural environment are encouraged. These include located facilities on the inside of a building parapet, flagpole, light pole or spire or other architectural feature of an existing building. These techniques are highly encouraged and may be required where there is high visibility of the antenna and/or other screening potential of the site is low. The use of artificial trees, rocks, or any other artificial technique used to disguise a facility as a natural feature is strongly discouraged. *In this instance, there are no buildings on the property (or elsewhere) of the appropriate height to enable the sort of architectural stealthing preferred by the Town's standards. (As noted, a rooftop site was explored and found to be unable to resolve the gap in coverage due to insufficient height.) Modern wireless equipment uses a variety of frequencies in order to provide high speed and high quality service.*

A side effect is that the antennas need a considerable amount of separation to prevent interference. The current design, visible on Sheet A-2.1 (Antenna Plan), with a detail below, already represents compromises for the sake of aesthetics, with antennas somewhat brought in to fit with the radius of the faux trees. A flagpole design that maintained the necessary separations would need a diameter of about 10' and would be much more eye-catching and less aesthetically suitable to the area than the faux tree proposed.

Although faux trees are discouraged by the 2003 guidelines, they represent the best aesthetic option for the present site. The site has been located about as far as possible from the public right of way, with Farley Road about 220' north, Shelburne Way about 190' south, University Avenue about 250 southeast, and Winchester Boulevard about 370' west. There are mature trees all around the block, some on the subject parcel and some on the neighboring parcel. From all vantage points, there will be other trees for the facility to blend with, which avoids a common shortcoming for faux tree stealthing, the scenario of a lone faux tree in an open space, which calls attention and scrutiny to the faux tree.

Detail from Antenna Plan (Sheet A-2.1), depicting radii of 6' and 9'



2. **Co-Location***: This section is not applicable to the present project.*
3. **Colors and Materials:** Wireless telecommunications antennas, structures, and related facilities shall have a non-reflective finish and whenever technically feasible, shall be textured to match the existing support structure or building and/or be painted to blend with the predominant background. *The pole of the facility will be painted a flat brown,*

and concealed by tapering faux branches, with a minimum of three branches per lineal foot, as noted on the site plan.

4. **Scale and Architectural Integration:** *This section does not apply to the present facility, but it is worth noting that, as you can see on the photo simulations, the faux tree is in keeping with the scale of the other trees in the area.*
5. **Equipment Shelters:** Equipment shelters, cabinets, back-up generators, and other associated equipment shall be architecturally compatible with the main building, structure, and/or surroundings and shall be fully screened from view from surrounding properties, public right-of-way, and other vantage points. These facility shall be located within an existing building or underground whenever technically possible. If these facilities are placed above ground, screening is required pursuant to B.1.4 of this section. *Associated equipment – including equipment cabinets and backup generator – has been placed within an existing storage building, which is itself well screened as noted above.*
6. **Rooftop and Façade Mounted Structures:** This section is not applicable to a non-rooftop facility.
7. **Lighting:** Wireless telecommunications towers, monopoles, or antennas shall not be artificially lit unless required by some other applicable authority such as the FAA. If lighting is required, it shall be placed in the least intrusive manner with minimal disturbance to surrounding views. *No lighting is proposed for the tower. The nearest airport, San Jose Mineta, is eight miles away to the northeast. No FAA lighting requirements are anticipated.*

- **Standards for Wireless Telecommunications Facilities: Design Standards**
  1. **Noise:** All wireless telecommunications facilities must comply with adopted Town noise ordinance. *Because the facility is close to the parcel boundary of the neighboring parcel, a Commercial-Industrial parcel with an existing industrial use, it will be necessary to fully engineer the building before we can provide an acoustic study confirming compliance. Intake fan models, acoustic louvers, and the structural composition of the existing building will need to be taken into account. That said, Verizon will comply with all requirements.*
  2. **Interference**: All wireless telecommunications facilities shall be operated in a manner which complies with the FCC regulations for signal interference, including but not limited to the interference with other telecommunications facilities and household electronics. *Verizon will fully comply with this requirement and all FCC requirements.*
  3. **Maintenance and Safety:** All telecommunications facilities shall be reviewed by the Santa Clara County Fire Department, Town of Los Gatos Monte Sereno Police Department and the Parks and Public Works Department. Facilities will be inspected by the Town's Building Inspection Department prior to final permit issuance for compliance with approved plans and Uniform Building Code. *Verizon will comply with all of these requirements.*

     Telecommunications towers and antennas shall be designed to remain in operation during a disaster. All possible measures to protect against fire, flood, earthquake, or other natural disasters shall be made. *Verizon will comply with disaster requirements. Between backup batteries and the emergency backup diesel generator, the site has been designed to stay on-air without commercial power in excess of 24 hours before resupply is needed.*

4. **RF Emissions Monitoring:** A bi-annual RF exposure report shall be required by the decision making body. In the event EME levels exceed acceptable limits, applicant is responsible for making all necessary adjustments to comply with FCC standards. *Verizon is prohibited by federal law and as a condition of its FCC licenses from violating FCC RF-EME safety standards. A full theoretical RF-EME study has been submitted as part of this application. The study includes an explanation of the standards in place and the methodology used. The study takes the equipment, site plans, broadcast frequencies, and other RF data, then assumes worst case assumptions, meaning that the facility will be broadcasting at full and full capacity at all times. Even under this worst case scenario, the report found the facility was below FCC general public exposure limits by a wide margin. On-air testing, by contrast, means sending an engineer to measure the actual output of the facility once it has been constructed and on-air. Verizon would request less frequent on-air testing after construction, as the actual testing is a significant burden and the site would be operating very far below the applicable limits.*

- **Standards for Wireless Telecommunications Facilities: Application, Process, and Requirements**
    1. **Comprehensive Service Network and Coverage Plan:** Each applicant for a wireless telecommunications permit shall provide to the Town an inventory of all its existing and proposed facilities within the Town, with the Town's sphere of influence, and within three miles of the Town boundary. *The location of all existing and future locations within a broad area is highly sensitive and proprietary business information, and well beyond the scope of what is required to ascertain coverage needs for the facility. Verizon therefore respectfully requests this portion of the standards be waived. Verizon remains to provide additional information on the technical for the site upon request.*
    2. **Site Alternatives Analysis:** *A site alternatives analysis has been provided. All colocations on existing wireless facilities were eliminated due to technical reasons.*
    3. **Conditional Use Permit:** *Because the facility is both a new freestanding structure and exceeds the height limits of the underlying zone, a Conditional Use Permit is required.*

- **Permit Process (Sec.29.20.213):** This section refers to the Town's Standards for Wireless Telecommunications Facilities, which require a Conditional Use Permit for the proposed project, as noted above.
- Findings (Sec.29.20.216): Must satisfy findings found in section 29.20.190 and along with the requirements in the Wireless Telecommunications Facilities ordinance.
- General Findings (Sec 29.20.190): These are the general findings required for all conditional use permits. Verizon incorporates all of the enclosed materials in support of the responses below.
    a. The deciding body, on the basis of the evidence submitted at the hearing, may grant a conditional use permit when specifically authorized by the provisions of this chapter if it finds that:
        1. The proposed uses of the property are essential to the public convenience or welfare. *Reliable wireless telecommunications services are essential to public safety and welfare. The public relies extensively on wireless devices, and the vast majority of 911 calls come from cell phones.*
        2. The proposed uses will not impair the existing uses of the zone. *The proposed wireless facility will not interfere with the existing uses in the Commercial-Industrial zone. The existing self-storage facility will operate as before and uses on surrounding parcels will not be impacted.*

3. The proposed uses would not be detrimental to public health, safety, or general welfare. *A third party RF-EME study has been provided showing compliance with FCC standards for EME safety.*
4. The proposed uses of the property are in harmony with the various elements or objectives of the general plan and the purposes of this chapter. *The project complies with Town of Los Gatos rules and regulations. It is also the least intrusive means of filling a gap in coverage in area – there is not viable, less intrusive means of providing this service.*
5. A hazardous waste facility proposal is subject to the California Health and Safety Code, Article 8.7, Section 25199-25199.14 and shall be consistent with the Santa Clara County Hazardous Waste Management Plan. *The facility includes a 203 gallon diesel fuel tank for the proposed emergency backup generator and two strings of backup batteries, to be included in an equipment cabinet. Verizon will comply with all requirements, including filing a Hazardous Materials Business Plan (HMBP) prior to any hazardous materials being stored onsite.*

ADDITIONAL INFORMATION

Safety Benefits of Improved Wireless Service

Verizon Wireless offers its customers multiple services such as voice calls, text messaging, mobile email, picture/video messaging, mobile web, navigation, broadband access, V CAST, and E911 services. Mobile phone use has become an extremely important tool for first responders and serves as a back-up system in the event of a natural disaster. Verizon will install a standby generator at this facility to ensure quality communication for the surrounding community in the event of a natural disaster or catastrophic event. This generator will be fully contained within the equipment shelter and will provide power to the facility if local power systems are offline.

Maintenance

Verizon installs standby generators and backup batteries at all its cell sites. The generator and batteries play a vital role in Verizon's emergency and disaster preparedness plan. In the event of a power outage, the back-up generator will automatically start and continue to run the site for up to 24 hours. The standby generator will operate for approximately 15 minutes every other week for maintenance purposes and will only be tested during the daytime. Back-up generators allow Verizon's sites to continue providing valuable communications services in the event of a power outage, natural disaster or other emergency. Following construction, a small sign indicating the facility owner and a 24-hour emergency telephone number will be provided on site.

Parking & Traffic

The facility is unmanned and will operate 24 hours a day, seven days a week. A technician will occasionally visit the facility to service the equipment, approximately once a month. There will no other visitors or guests associated with the facility.

Construction Schedule

The construction of the facility will follow all local rules and regulations. The crew size will range from two to ten individuals. The construction phase of the project will last approximately two months and will not exceed acceptable noise levels.

Compliance with FCC Standards

This project will not interfere with any TV, radio, telephone, satellite, or other signals. Any interference would be against federal law and a violation of Verizon's FCC license. An RF report verifying compliance with FCC guidelines is included with this submittal.

Environmental Assessment

A study verifying compliance with FCC EME regulations has been included as part of this application.

Airports

There are no airports or airstrips within five miles of the proposed facility.

Water Usage

As the facility is unmanned and no landscaping is proposed, there will be no impact on water usage on the property.

Notice of Actions Affecting Development Permit

In accordance with California Government Code Section 65945(a), Verizon requests notice of any proposal to adopt or amend the: general plan, specific plan, zoning ordinance, ordinance(s) affecting building or grading permits that would in any manner affect this development permit. Any such notice may be sent to 2009 V Street, Sacramento, CA 95818.