



PLANNING & DEVELOPMENT SERVICES



250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
(650) 329-2441

May 25, 2021

Jeremy Stroup
GTE Mobilnet of CA, LLP, dba Verizon Wireless
575 Lennon Ln., #125
Walnut Creek, CA 94598

Subject: 250 Hamilton Avenue [20PLN-00118]; Wireless Communication Facility (WCF) Permit Applications for three WCF Nodes – Verizon Cluster 4

Dear Mr. Stroup:

On May 25, 2021, the Director of Planning and Development Services (Director) made decisions regarding three nodes requested with application 20PLN-00118. The Director has approved three WCF nodes referenced in file 20PLN-00118 based upon findings in **Attachments A, B, and C**. These Decisions are for the following three WCF nodes proposed on metal streetlight utility poles in the public right of way:

- Node 061, (adjacent to 1221 Middlefield Road); Approved
- Node 204, (adjacent to 850 Webster Street); Approved
- Node 205, (adjacent to 853 Middlefield Road); Approved

Background

The City initially received applications for seven Wireless Communication (WCF) nodes in Verizon Cluster 4 (20PLN-00118) on June 15, 2020. Upon review, the City deemed the application incomplete on June 20, 2020. The applicant removed nodes in subsequent resubmittals such that the final submittal only included three proposed locations. As of May 7, 2021, the project was deemed complete because the applicant provided adequate documentation to satisfy the checklist requirements.

The WCF nodes in Verizon Cluster 4 are described as Tier 2 Wireless Communication Facilities under the Palo Alto Municipal Code, with review and decision processes subject to Palo Alto Municipal Code (PAMC) Sections 18.42.110(g), 18.42.110(i), and 18.42.110 (k) (2019). The applicable objective standards for this application are under City of Palo Alto Resolution No. 9873.

Decisions

These Decisions are based upon the review of all information contained within the project plans as well as the administrative record in comparison to applicable objective wireless administrative standards (objective standards), zoning regulations, and other municipal code requirements. In accordance with the California Environmental Quality Act (CEQA), the Director has determined that these Decisions are categorically exempt pursuant to CEQA Guidelines Sections 15303 (New Construction and Conversion of Small Structures) and 15311 (Accessory Structures).

EFFECTIVE DATE FOR DECISIONS AND APPEALS PROCEDURE: The Decisions on each of the three WCF nodes shall become final and effective fourteen (14) calendar days from the postmark date of the letter and notice

20PLN-00118



card mailing (or on the next business day if it falls on a weekend or holiday), unless an appeal(s) is filed. Any appeal(s) shall be in writing and submitted to the Planning Division prior to the end of the business day of the fourteenth day. The Decisions for those WCF nodes that are not appealed within this time shall become final.

In accordance with PAMC Section 18.42.110(g), any appeal(s) may be set for hearing before the City Council or may be placed on the City Council's consent calendar, pursuant to PAMC Section 18.77.070(f). The appeal form, which contains brief instructions, can be found on the City website (<https://bit.ly/2PurTEk>). Each appealed WCF node should be specifically listed by node number on the appeal form and, in the letter, stating the reason(s) for the appeal. In the event you assert that Federal law preempts any element of this decision, provide all relevant evidence. While subject to change, any appeal, if filed, would likely be considered by the City Council at a special meeting on Tuesday, June 22, 2021.

The cost to appeal Director decisions on one or more WCF nodes is the \$610.50 appeal filing fee. In addition, there is an initial deposit for appeals of \$3,910, which is due from the applicant as follows: In the event an applicant files an appeal, the initial deposit of \$3,910 must be paid together with the appeal filing fee for the appeal to be considered timely. If an appeal is filed by a party other than applicant, applicant must provide the initial deposit of \$3,910 within 5 business days from the date the City provides applicant with notice of the appeal. As outlined in the Municipal Fee Schedule, this deposit is refunded if the City Council denies a third-party appeal or upholds an applicant appeal.

Approvals shall be effective for one year from the date they become final, within which time construction of the project shall have commenced. Applications for extensions may be made prior to approval expiration. Should you have any questions regarding this approval, please do not hesitate to contact Garrett Sauls, at (650) 329-2471, or e-mail Garrett.Sauls@CityofPaloAlto.org.

Sincerely,

DocuSigned by:

293CF322E1294F6...

Jonathan Lait
Director of Planning and Development Services

Cc:

Paul Albritton, Verizon Legal Counsel
Don Austin, PAUSD Superintendent & PAUSD Board of Education (for NODE 205)
Property owners and tenants within 600 feet of each WCF

ATTACHMENTS:

ATTACHMENT A:

FINDINGS FOR APPROVAL OF NODE 061

ATTACHMENT B:

FINDINGS FOR APPROVAL OF NODE 204

ATTACHMENT C:

FINDINGS FOR APPROVAL OF NODE 205

ATTACHMENT D:

CONDITIONS OF APPROVAL

ATTACHMENT A:
FINDINGS FOR APPROVAL OF NODE 061

I. Applicable Provisions of the Palo Alto Municipal Code

- **Section 18.42.110(g)(2)-(3) [Tier 2] (2019)**

(2) The Director, or Council on appeal, shall grant a Tier 2 WCF Permit provided the proposed WCF complies with the conditions of approval in Section 18.42.110(j) and all objective standards adopted and amended from time to time by resolution of the City Council or the development standards in Section 18.42.110(i).

(3) The Director, or Council on appeal, shall deny a Tier 2 WCF Permit if the above findings [PAMC Section 18.42.110(j)] cannot be made.

- **Section 18.42.110(k)(1) [2019]:**

The decision-making authority may grant exceptions to objective standards adopted by City Council resolution or any provision of this Section 18.42.110, upon finding that:

- A. The proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible; and either
- B. As applied to a proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both; or
- C. Denial of the application as proposed would violate federal law, state law, or both.

II. Findings Pursuant to PAMC Section 18.42.110(g):

- The Director finds that Node 061 meets the conditions of approval in Section 18.42.110(j). Node 061 complies with PAMC Section 18.42.110(j) because the referenced Wireless Communication Facility standard conditions of approval are incorporated into the specific conditions of approval for this project 20PLN-00118.
- Although Node 061 fails to meet one or more of the objective standards adopted by City Council Resolution No. 9873, the applicant has applied for exceptions to the objective standards and the Director has made the required findings for the exceptions, as provided in Section III below. With the requested exceptions, the application complies with all applicable objective standards.

III. Findings for Exceptions Pursuant to PAMC Section 18.42.110(k)

Node 61 requires exceptions from the following objective standards: Permitted Zoning Districts, Pole Replacement/Style Placement Guide, and WCF Design Quality - Equipment Facing Private Property. The required findings for these exceptions can be made, as follows:

PAMC 18.42.110(k)(1)(A)

The City finds that the proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible, for the following reasons:

1. The applicant has demonstrated that they are seeking to limit the aesthetic impacts of their facility to the greatest extent possible while meeting their coverage objective. Based on the City's review of potential alternative sites and designs, other available WCF locations in the area would also require exceptions to the Objective Standards and would have a greater aesthetic impact on the environment.
2. *Permitted Zoning Districts*: The applicant has demonstrated that, given the limited reach of available network equipment, they would not be able to meet their coverage objective without locating a WCF in

a residential zone district. However, the applicant has attempted to comply with this standard to the greatest extent feasible by softening the aesthetic impacts created by the installation of these facilities in a residential zone district. The applicant has: proposed to shroud their antennas in order to hide any loose wires/cables, conformed to the volume allowances established by the Objective Standards inclusive of the shrouding, located the facility in an area where existing and proposed trees will screen it from view when traveling along the street from a pedestrian or vehicle level, and placed the facility outside the Residential Zone of Exclusion.

3. *Pole Replacement/Style Placement Guide*: The applicant has retained the aluminum material, fluted pole, pole taper from bottom to top, and Munsell Green color of the Downtown Style light poles. The facility, however, does not comply with the Downtown Style's existing diameter for the light pole, the base width and height for the decorative clamshell base, and the light mast arm length. The applicant has identified that the light pole diameter must be modified from the City's standard of seven (7) inches to 10 inches in order to support structural stability for the added antennas. As a result, the standard 19- and 7/8-inch base width to the clamshell would not fit, so they have proposed a 24-inch clamshell base. Staff has reviewed the calculations provided in the application and agree that the City's current Downtown standard would not support the addition of antennas on it and that the deviation to the diameter and base of the clamshell is minor enough to remain consistent with the overall Downtown style. As noted in the Conditions of Approval, the other items shall be adjusted to conform to the City's requirements.
4. *WCF Design Quality - Equipment Facing Private Property*: The plans show two of the three antennas do not face private property. While one antenna faces private property, the applicant has placed it in a manner that does not face perpendicular to the adjacent properties. In concert with the surrounding trees, this will help the facility blend in with the surrounding environment as it will contrast less with the typical movement patterns of vehicles and pedestrians along the street such that the facility will not immediately intersect with a their line of sight. In looking at all other locations, there were no opportunities where this condition would not apply that required a lesser number of exceptions.

When exceptions are sought, the application is evaluated against all requirements of PAMC 18.42.110, including the Generally Applicable Development Standards (PAMC 18.42.110(i)) as indicated below. This analysis is provided to demonstrate how this node meets the Generally Applicable Development Standards.

1. Node 061 meets Generally Applicable Development Standard 1, that each WCF *"shall utilize the smallest antennae, radio, and associated equipment, as measured by volume, technically feasible to achieve a network objective."* The proposed Wireless Communication Facilities (WCF) employs a design that balances aesthetic considerations and reduces, to the extent feasible, the small cell's footprint on the utility pole. The facility meets the Objective Standard's requirements that each antenna (inclusive of shrouding) be no larger than 0.85 cubic feet and, cumulatively, be no larger than 2.6 cubic feet for a 5G design.
2. Node 061 meets Generally Applicable Development Standard 2, that each WCF *"shall be screened from public view."* The proposed antennas are screened from public view with metal shrouds that will be painted to match existing or proposed utility poles and Style Placement Guide specifications. Other equipment will be placed within an underground vault which will not be visible from ground level. Additionally, both sites have existing and proposed trees within 35 feet of the facility as required by the Objective Standards and the Conditions of Approval that will serve to further screen the WCF from view.
3. Nodes 061 meets Generally Applicable Development Standard 3, that each WCF *"when attached to an existing structure, shall be shrouded or screened using materials or colors found on existing structure."*

The small cell nodes will be located on metal streetlight poles. The proposed shroud and concealment approach is consistent and compatible with the colors and materials found on the Downtown Style of light poles the City has adopted through the Style Placement Guide.

4. Nodes 061 meets Generally Applicable Development Standard 4, that each WCF *"Shall be placed at a location that would not require the removal of any required landscaping or would reduce the quantity of landscaping to a level of noncompliance with the Zoning Code."* No significant landscaping or parkway planting will be disturbed or lost. Where a small, existing, *Littleleaf linden* is proposed to be removed at Node 061, the Conditions of Approval provide that it be replaced in kind within the planter strip. Additionally, the Conditions of Approval require that the replacement for this tree be two-to-one to be consistent with the Tree Technical Manual's "No Net Loss of Canopy" requirement. This will be actualized through an in-lieu fee payment for the replacement tree.
5. Nodes 061 meets Generally Applicable Development Standard 5, that *"An antenna, base station, or tower shall be of a "camouflaged" or "stealth" design, including concealment, screening, and other techniques to hide or blend the antenna, base station, or tower into the surrounding area, such as the use of a monopine design,"* The proposed antennas will be concealed with shrouds colored to the extent feasible to match the Downtown Style specifications. Other equipment will be placed within an underground vault which will not be visible from ground level. The placement and orientation of each node's equipment has been evaluated to minimize visual impacts and, to the extent feasible, blend in with the surrounding area where existing or proposed trees will be within 35 feet of the facility on either side of the street.
6. Nodes 061 meets Generally Applicable Development Standard 6, that each WCF *"Shall not be attached on a historic structure/site, as designated by Chapter 16.49,"* This provision does not apply to the subject project as the facilities are not proposed on a historic structure or site. The Objective Standards additionally identify that an exception would be needed to locate a facility adjacent to a site that is currently undergoing an evaluation to determine California Register of Historic Resources (CRHR) or National Register of Historic Places (NRHP) eligibility. All surrounding buildings have been researched by staff and none have an active application to determine eligibility for either historic category and are not located within a historic district on the local register of historic places.

PAMC 18.42.110(k)(1)(C)

The City finds that as applied to the proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both, for the following reasons:

- The applicant has asserted that there is a significant coverage gap in their small cell 5G services within this area as the basis for their facility's location. Currently, Verizon does not have any 5G small cell locations installed within Palo Alto which affirms the applicant's statement. Because the applicant has shown that no alternative WCF locations in this service area would have a lesser aesthetic impact, denial of this node would imply that no application in this service area could be approved; therefore denial of the proposed location would represent a material inhibition on the provision of wireless services.

ATTACHMENT B:
FINDINGS FOR APPROVAL OF NODE 204

I. Applicable Provisions of the Palo Alto Municipal Code

- **Section 18.42.110(g)(2)-(3) [Tier 2] (2019)**

(2) The Director, or Council on appeal, shall grant a Tier 2 WCF Permit provided the proposed WCF complies with the conditions of approval in Section 18.42.110(j) and all objective standards adopted and amended from time to time by resolution of the City Council or the development standards in Section 18.42.110(i).

(3) The Director, or Council on appeal, shall deny a Tier 2 WCF Permit if the above findings [PAMC Section 18.42.110(j)] cannot be made.

- **Section 18.42.110(k)(1) [2019]:**

The decision-making authority may grant exceptions to objective standards adopted by City Council resolution or any provision of this Section 18.42.110, upon finding that:

- A. The proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible; and either
- B. As applied to a proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both; or
- C. Denial of the application as proposed would violate federal law, state law, or both.

II. Findings Pursuant to PAMC Section 18.42.110(g):

- The Director finds that Node 204 meets the conditions of approval in Section 18.42.110(j). Node 204 complies with PAMC Section 18.42.110(j) because the referenced Wireless Communication Facility standard conditions of approval are incorporated into the specific conditions of approval for this project 20PLN-00118.
- Although Node 204 fails to meet one or more of the objective standards adopted by City Council Resolution No. 9873, the applicant has applied for exceptions to the objective standards and the Director has made the required findings for the exceptions, as provided in Section III below. With the requested exceptions, the application complies with all applicable objective standards.

III. Findings for Exceptions Pursuant to PAMC Section 18.42.110(k)

Node 204 requires exceptions from the following objective standards: Permitted Zoning Districts, Pole Replacement/Style Placement Guide, Residential Roadways, and Distance Between WCFs. The required findings for these exceptions can be made, as follows:

PAMC 18.42.110(k)(1)(A)

The City finds that the proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible, for the following reasons:

1. The applicant has demonstrated that they are seeking to limit the aesthetic impacts of their facility to the greatest extent possible while striving to meet their coverage objective. Based on the City's review of potential alternative sites and designs, other available WCF locations in the area would also require exceptions to the Objective Standards and would have a greater aesthetic impact on the environment.
2. *Permitted Zoning Districts:* In order to soften the aesthetic impacts created by the installation of these facilities in a residential zone district, the applicant has: proposed to shroud their antennas in order to hide any loose wires/cables, conformed to the volume allowances established by the Objective Standards inclusive of the shrouding, located the facility in an area where existing and proposed trees

will screen it from view when traveling along the street from a pedestrian or vehicle level, and placed the facility outside the Residential Zone of Exclusion.

3. *Pole Replacement/Style Placement Guide*: The applicant has retained the aluminum material, fluted pole, pole taper from bottom to top, and Munsell Green color of the Downtown Style light poles. The facility, however, does not comply with the Downtown Style's existing diameter for the light pole, the base width and height for the decorative clamshell base, and the light mast arm length. The applicant has identified that the light pole diameter must be modified from the City's standard of seven (7) inches to 10 inches in order to support structural stability for the added antennas. As a result, the standard 19- and 7/8-inch base width to the clamshell would not fit, so they have proposed a 24-inch clamshell base. Staff has reviewed the calculations provided in the application and agree that the City's current Downtown standard would not support the addition of antennas on it and that the deviation to the diameter and base of the clamshell is minor enough to remain consistent with the overall Downtown style. As noted in the Conditions of Approval, the other items shall be adjusted to conform to the City's requirements.
4. *Residential Roadways*: The facility will be screened from view due to the presence of trees within 35 feet on each side, the equipment will be placed within a shroud that conceals all wires and cables from view, and will meet the individual and cumulative volume requirements identified in the objective standards.
5. *Distance Between WCFs*: There is currently a T-Mobile facility located within an enclosure on the rooftop (roughly 130 feet tall) of the adjacent building at 850 Webster Street as well as an AT&T Mobility facility located on top of a 40 foot tall wood utility pole to the West of the proposed location near the intersection of Cowper Street and Homer Avenue. Each are within 250 linear feet of the proposed facility. The proposed location (29 feet tall) has been designed to retain the existing Ash trees within 35 feet of the facility, retain the Downtown Style of street light poles, and shroud their equipment within the volume requirements prescribed by the Objective Standards. These will serve to interrupt direct views of the facility along the vehicle and pedestrian environment once grown to maturity. The proximity of these WCFs to one another does not result in a cumulative impact to RF exposure that exceeds acceptable levels as identified in the reports provided from Hammett & Edison and CTC. Given the different visual planes for each facility (29, 40, and 130 feet high), along with the existence of numerous street trees along Homer Avenue towards Cowper Street, the proposed antennas will not have a deleterious impact to the street scape context such that the inclusion of this facility will result in a more visible or cluttered corridor with wireless facility equipment.

When exceptions are sought, the application is evaluated against all requirements of PAMC 18.42.110, including the Generally Applicable Development Standards (PAMC 18.42.110(i)) as indicated below. This analysis is provided to demonstrate how this node meets the Generally Applicable Development Standards.

1. Node 204 meets Generally Applicable Development Standard 1, that each WCF "*shall utilize the smallest antennae, radio, and associated equipment, as measured by volume, technically feasible to achieve a network objective.*" The proposed Wireless Communication Facilities (WCF) employs a design that balances aesthetic considerations and reduces, to the extent feasible, the small cell's footprint on the utility pole. The facility meets the Objective Standard's requirements that each antenna (inclusive of shrouding) be no larger than 0.85 cubic feet and, cumulatively, be no larger than 2.6 cubic feet for a 5G design.
2. Node 204 meets Generally Applicable Development Standard 2, that each WCF "*shall be screened from public view.*" The proposed antennas are screened from public view with metal shrouds that will be painted to match existing or proposed utility poles and Style Placement Guide specifications. Other

equipment will be placed within an underground vault which will not be visible from ground level. Additionally, both sites have existing and proposed trees within 35 feet of the facility as required by the Objective Standards and the Conditions of Approval that will serve to further screen the WCF from view.

3. Node 204 meet Generally Applicable Development Standard 3, that each WCF *“when attached to an existing structure, shall be shrouded or screened using materials or colors found on existing structure.”* The small cell nodes will be located on metal streetlight poles. The proposed shroud and concealment approach is consistent and compatible with the colors and materials found on the Downtown Style of light poles the City has adopted through the Style Placement Guide.
4. Node 204 meets Generally Applicable Development Standard 4, that each WCF *“Shall be placed at a location that would not require the removal of any required landscaping or would reduce the quantity of landscaping to a level of noncompliance with the Zoning Code.”* No significant landscaping or parkway planting will be disturbed or lost.
5. Node 204 meets Generally Applicable Development Standard 5, that *“An antenna, base station, or tower shall be of a “camouflaged” or “stealth” design, including concealment, screening, and other techniques to hide or blend the antenna, base station, or tower into the surrounding area, such as the use of a monopine design.”* The proposed antennas will be concealed with shrouds colored to the extent feasible to match the Downtown Style specifications. Other equipment will be placed within an underground vault which will not be visible from ground level. The placement and orientation of each node’s equipment has been evaluated to minimize visual impacts and, to the extent feasible, blend in with the surrounding area where existing or proposed trees will be within 35 feet of the facility on either side of the street.
6. Node 204 meet Generally Applicable Development Standard 6, that each WCF *“Shall not be attached on a historic structure/site, as designated by Chapter 16.49,”* This provision does not apply to the subject project as the facilities are not proposed on a historic structure or site.

PAMC 18.42.110(k)(1)(C)

The City finds that as applied to the proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both, for the following reasons:

- The applicant has asserted that there is a significant coverage gap in their small cell 5G services within this area as the basis for their facility’s location. Currently, Verizon does not have any 5G small cell locations installed within Palo Alto which affirms the applicant’s statement. Because the applicant has shown that no viable alternative WCF locations in this service area would have a lesser aesthetic impact, denial of this node would imply that no application in this service area could be approved; therefore denial of the proposed location would represent a material inhibition on the provision of wireless services.

ATTACHMENT C:
FINDINGS FOR APPROVAL OF NODE 205

I. Applicable Provisions of the Palo Alto Municipal Code

- **Section 18.42.110(g)(2)-(3) [Tier 2] (2019)**

(2) The Director, or Council on appeal, shall grant a Tier 2 WCF Permit provided the proposed WCF complies with the conditions of approval in Section 18.42.110(j) and all objective standards adopted and amended from time to time by resolution of the City Council or the development standards in Section 18.42.110(i).

(3) The Director, or Council on appeal, shall deny a Tier 2 WCF Permit if the above findings [PAMC Section 18.42.110(j)] cannot be made.

- **Section 18.42.110(k)(1) [2019]:**

The decision-making authority may grant exceptions to objective standards adopted by City Council resolution or any provision of this Section 18.42.110, upon finding that:

- A. The proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible; and either
- B. As applied to a proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both; or
- C. Denial of the application as proposed would violate federal law, state law, or both.

II. Findings Pursuant to PAMC Section 18.42.110(g):

- The Director finds that Node 205 meets the conditions of approval in Section 18.42.110(j). Node 205 complies with PAMC Section 18.42.110(j) because the referenced Wireless Communication Facility standard conditions of approval are incorporated into the specific conditions of approval for this project 20PLN-00118.
- Although Node 205 fails to meet one or more of the objective standards adopted by City Council Resolution No. 9873, the applicant has applied for exceptions to the objective standards and the Director has made the required findings for the exceptions, as provided in Section III below. With the requested exceptions, the application complies with all applicable objective standards.

III. Findings for Exceptions Pursuant to PAMC Section 18.42.110(k)

Node 205 requires exceptions from the following objective standards: Permitted Zoning Districts, Public School Boundary, Residential Roadways, WCF Design Quality - Equipment Facing Private Property, Curb Clearances, Pole Replacement/Style Placement Guide, and Landscape Screening. The required findings for these exceptions can be made, as follows:

PAMC 18.42.110(k)(1)(A)

The City finds that the proposed WCF complies with the requirements of this Section 18.42.110 and any other requirements adopted by the City Council to the greatest extent feasible, for the following reasons:

1. The applicant has demonstrated that they are seeking to limit the aesthetic impacts of their facility to the greatest extent possible while striving to meet their coverage objective. Based on the City's review of potential alternative sites and designs, other available WCF locations in the area would also require exceptions to the Objective Standards and would have a greater aesthetic impact on the environment.
2. *Permitted Zoning Districts*: The applicant has demonstrated that, given the limited reach of available network equipment, they would not be able to meet their coverage objective without locating a WCF in a residential zone district. However, the applicant has attempted to comply with this standard to the

greatest extent feasible by softening the aesthetic impacts created by the installation of these facilities in a residential zone district. The applicant has: proposed to shroud their antennas in order to hide any loose wires/cables, conformed to the volume allowances established by the Objective Standards inclusive of the shrouding, and located where the existing aesthetic impact of utility equipment will not be exacerbated by the introduction of a new WCF.. In addition, this location is immediately adjacent to a non-residential use and therefore has a more limited aesthetic impact on the residential zone district.

3. *Public School Boundary:* As proposed, the facility is located within 600 feet of Addison Elementary School. In looking at other alternatives within the coverage area, only the wood utility poles along the Eastern side of Channing Avenue are outside the 600-foot boundary. The applicant has identified that their equipment cannot be mounted on top of the wood utility poles, as they need to be placed at similar heights to other facilities in order to support the network. Additionally, the wood utility poles do not have appropriate spacing per G.O. 95 rules to locate the facilities at a mid-pole mounted location. Therefore, the alternative poles in the coverage area but beyond 600 feet of Addison Elementary School are not technically feasible. The applicant has attempted to comply with this standard to the greatest extent feasible by proposing a location that is approximately 540 feet from the school's property line.
4. *Residential Roadways:* The applicant proposed one alternative location within the coverage area that was on a residential arterial roadway rather than a local/collector street. However, this alternative location would have a greater aesthetic impact than the proposed location when considering the existing aesthetic condition. For example, alternative D would require the permanent removal of two street trees. In addition, the proposed location is adjacent to a commercial parking lot, meeting the priority for placement of a feasible WCF most distant from residential property. Finally, this location is not currently within a planned undergrounding district; the WCF will not have an increased aesthetic impact in the future, as existing utilities will remain. Because there are no alternative locations on non-local/collector streets with lesser aesthetic impacts, the proposed location complies with this objective standard to the greatest extent feasible.
5. *WCF Design Quality - Equipment Facing Private Property:* The plans show two of the three antennas do not face private property. One antenna directly faces the adjacent property of 853 Middlefield Road. The adjacent landscape planter has two existing Chinese Pistache trees that will serve to interrupt direct views of the facility from the subject property. The applicant has proposed an amenity tree underneath the existing communication lines towards the Eastern side of the facility to help interrupt direct views of the facility. Given the presence of other utility equipment in the area, the addition of this facility will not introduce a greater aesthetic impact than already exists around the area. The applicant seeks to lessen its impact by planting an amenity tree and shrouding the antenna wires/cables. There are no alternative locations within the coverage area that do not require this exception; for the reasons provided in this paragraph, the proposed location minimizes aesthetic impacts of the exception and represents the greatest feasible compliance with this standard.
6. *Curb Clearances:* The proposed location is within 24 inches of a curb face, where the objective standards require at least 36 inches of clearance. Although there are alternative locations that comply with this standard, overall, the proposed location has the least aesthetic impact when considering the existing aesthetic condition of the site. Given the presence of other utility equipment in the area, the addition of this facility will not introduce a greater aesthetic impact than already exists around the area and seeks to lessen its impact through the use of amenity tree placement and shrouding of antenna wires/cables.
7. *Pole Replacement/Style Placement Guide:* The applicant has retained the aluminum material, fluted pole, pole taper from bottom to top, and Munsell Green color of the replacement light poles. The facility, however, does not comply with the pole type's existing diameter for the light pole and height. The applicant has identified that the light pole diameter must be modified from the City's standard of six and a half (6.5) inches to eight (8) inches in order to support structural stability for the added antennas. Staff has reviewed the calculations provided in the application and agree that the City's current standard

would not support the addition of antennas on it and that the deviation to the diameter of the pole is minor enough to remain consistent with the overall replacement style. As noted in the Conditions of Approval, the other items shall be adjusted to conform to the City's requirements

8. *Landscape Screening*: The applicant has proposed an amenity tree underneath the existing communication lines towards the Eastern side of the facility to help interrupt direct views of the facility. There are no viable locations for an amenity tree along the Western side of the street due to the presence of utility guide wires and the adjacent property's driveway. Given the presence of other utility equipment in the area, the addition of this facility will not introduce a greater aesthetic impact than already exists around the area and seeks to lessen its impact through the use of amenity tree placement and shrouding of antenna wires/cables.

When exceptions are sought, the application is evaluated against all requirements of PAMC 18.42.110, including the Generally Applicable Development Standards as indicated below. This analysis is provided to demonstrate how this node meets the Generally Applicable Development Standards.

1. Node 205 meets Generally Applicable Development Standard 1, that each WCF *"shall utilize the smallest antennae, radio, and associated equipment, as measured by volume, technically feasible to achieve a network objective."* The proposed Wireless Communication Facilities (WCF) employs a design that balances aesthetic considerations and reduces, to the extent feasible, the small cell's footprint on the utility pole. The facility meets the Objective Standard's requirements that each antenna (inclusive of shrouding) be no larger than 0.85 cubic feet and, cumulatively, be no larger than 2.6 cubic feet for a 5G design.
2. Node 205 requires an exception from Generally Applicable Development Standard 2, that each WCF *"shall be screened from public view."* Although the proposed location does not permit screening trees or similar landscaping on both sides of the WCF along the public right of way, the applicant has proposed an amenity tree underneath the existing communication lines towards the Eastern side of the facility to help interrupt direct views of the facility. In addition, the proposed antennas are covered with metal shrouds that will be painted to match existing or proposed utility poles and Style Placement Guide specifications. Other equipment will be placed within an underground vault which will not be visible from ground level. Given the presence of above ground utilities and a location adjacent to a parking lot for a non-residential use, the facility will be introduced into an area that is not currently an aesthetically pleasing environment, and applicant's addition of an amenity tree will improve the area aesthetics. This location is not currently within a planned undergrounding district; the WCF will not have an increased aesthetic impact in the future, as existing utilities will remain. An exception can be granted because the proposed location has fewer aesthetic impacts than alternative locations and the applicant's proposals provide the greatest amount of screening feasible for the location.
3. Node 205 meets Generally Applicable Development Standard 3, that each WCF *"when attached to an existing structure, shall be shrouded or screened using materials or colors found on existing structure."* The small cell node will be located on metal streetlight poles. The proposed shroud and concealment approach is consistent and compatible with the colors and materials found on the replacement style of light poles the City has adopted through the Style Placement Guide.
4. Node 205 meets Generally Applicable Development Standard 4, that each WCF *"Shall be placed at a location that would not require the removal of any required landscaping or would reduce the quantity of landscaping to a level of noncompliance with the Zoning Code."* No significant landscaping or parkway planting will be disturbed or lost.

5. Node 205 meets Generally Applicable Development Standard 5, that *“An antenna, base station, or tower shall be of a "camouflaged" or "stealth" design, including concealment, screening, and other techniques to hide or blend the antenna, base station, or tower into the surrounding area, such as the use of a monopine design,”* As noted above in *Finding #2* the proposed antennas will be concealed with shrouds colored to the extent feasible to match the replacement style specifications. Other equipment will be placed within an underground vault which will not be visible from ground level.
6. Node 205 meets Generally Applicable Development Standard 6, that each WCF *“Shall not be attached on a historic structure/site, as designated by Chapter 16.49,”* This provision does not apply to the subject project as the facilities are not proposed on a historic structure or site.

PAMC 18.42.110(k)(1)(C)

The City finds that as applied to the proposed WCF, the provision(s) from which exception is sought would deprive the applicant of rights guaranteed by federal law, state law, or both, for the following reasons:

- The applicant has asserted that there is a significant coverage gap in their small cell 5G services within this area as the basis for their facility's location. Currently, Verizon does not have any 5G small cell locations installed within Palo Alto which affirms the applicant's statement. Because the applicant has shown that no viable alternative WCF locations in this service area would have a lesser aesthetic impact, denial of this node would imply that no application in this service area could be approved; therefore denial of the proposed location would represent a material inhibition on the provision of wireless services.

ATTACHMENT D
TIER 2 WIRELESS COMMUNICATION FACILITY
CONDITIONS OF APPROVAL FOR NODES 061, 204, and 205

This approval is based upon the finding that the proposed project complies with the Tier 2 WCF permit process and complies with applicable findings set forth in this letter above. The approval of this project shall be subject to the following conditions of approval.

Planning Division

1. **COMPLIANCE WITH APPROVED PLANS.** Except as modified by these Conditions of Approval, each of the three (3) WCF nodes shall be built in compliance with the approved plans and associated application materials on file with the Planning Division for 20PLN-00118, except as modified by these conditions of approval. The aforementioned plans and application materials include:
 - Project Description, received April 27, 2021, including in regard to coverage and capacity information and azimuth direction.
 - Project Plans, titled "PALO ALTO SMALL CELL CITY CLUSTER 4/VERIZON CLUSTER 6," received April 27, 2021 for the following nodes:
 - Node 061, CPAU Streetlight # 121 (adjacent to 1221 Middlefield Road)
 - Node 204, CPAU Streetlight # 53 (adjacent to 850 Webster Street)
 - Node 205, CPAU Streetlight # 71 (adjacent to 853 Middlefield Road)

2. **SITE SPECIFIC REQUIREMENTS.** Encroachment permit and streetwork permit plan sets shall include accurate locations of driveways, curb lines, utilities, the existing light mast orientation, and other existing conditions for each WCF. All existing street signs shall be retained and reinstalled at their existing heights or replaced to match existing if damaged. If damaged, existing painted curbs and other markings, curb ramps, ADA markings, crosswalks, and similar shall be replaced as part of construction. All street trees and private trees within the primary construction area and any trenching and boring areas shall be protected in accordance with the requirements in the City's Technical Tree Manual. The approved plans must be updated to include the following:
 - Node 061 and Node 204 – In accordance with Condition of Approval 52 the light mast arm on the elevation drawings and schematic detail for the light pole shall be four (4) feet in length.
 - Node 061 and Node 204 – In accordance with Condition of Approval 51 the height of the decorative clam shell base on the elevation drawings and schematic detail shall be 35- and 13/16-inches tall. The width shall be 24-inches wide.
 - Node 061 – In accordance with Conditions of Approval 8 and 49, the site plan sheets (A1-A2) and arborist reports shall show a Littleleaf Linden replacing the existing Littleleaf Linden. In addition, one replacement tree shall be provided via in-lieu fee to maintain the City's No Net Loss of Canopy requirements.
 - Node 204 – The Hammett and Edison reports in C5_250HAM_DOCS and C5_250HAM_PLANS shall be updated to reflect the azimuths being angled at a 35 ° and 215 °.
 - Node 205 – The replacement pole shall follow the height of the existing style to be replaced. The elevations and schematic detail shall be updated to show the height of the replacement pole being 21 feet with a 36-inch rise on the light mast arm. The added five feet the applicant is proposing shall result in a 26-foot-tall light pole.
 - Node 205 – Banners are not present at this facility. The elevation drawings and schematic details shall be updated to remove these features.

3. **NODE ALTERNATES.** This approval does not include approval of any WCF node alternates discussed during the review process for 20PLN-00118.
4. **LIGHTING.** The height and orientation of illumination, photometrics and color temperature employed by the light masts shall remain the same as in existing conditions or follow the approved replacement style if located within a designated area of the Style Placement Guide.
5. **PAINT COLOR FOR REPLACEMENT STREETLIGHT POLE, LIGHTMAST, SHROUD AND OTHER FEATURES ON THE POLE.** Each node shall be painted to match the Downtown Style Munsell RAL5.5GY2.76/2.1 green color.
6. **ANTENNA/RADIO/CABLING/SHROUD DESIGN.** The antenna, cabling, and radio equipment will not be visible and shall be concealed and screened within a single custom green painted shroud that is mounted on the replacement streetlight pole. The shroud shall not have gaps or provide visibility to the sky between the top of the replacement streetlight pole and the bottom of the shroud. The shroud shall employ a taper to integrate fully with the tapering of the top of the replacement streetlight pole. Individually, each antenna, plus the shroud, shall not exceed 0.85 cubic feet. Cumulatively, these antennas shall not exceed 2.6 cubic feet. Aside from the portion that is tapered from the bottom of the equipment to meet the tapering of the pole, the shroud shall be continuous in its face. Venting louvers, if any, shall be minimized to the extent feasible. The shroud shall not extend more than 5-feet 6-inches in height beyond the top of the replacement streetlight pole.
7. **MINOR MODIFICATIONS AT APPROVED NODE LOCATIONS.** For approved node locations, and in their discretion, the Director of Planning and Development Services may approve minor modifications to these conditions, consistent with the required findings, in order to address any resource, technical, or utilities engineering-related site constraints.
8. **SCREENING TREES FOR NODES 061, 204, AND 205.** Existing street trees are within 35 feet of Nodes 061 and 204. The applicant is proposing to replace an existing street tree (Littleleaf Linden) with an amenity tree (Swamp Myrtle) at Node 061. As identified under COA 49 by Urban Forestry, this tree must be replaced with a Littleleaf Linden and additional replacement trees are required based on the No Net Loss of Canopy requirements in the Tree Technical Manual which may be paid through in-lieu fees. No trees are required to be removed at Node 204 and the existing Ash Trees shall not be removed. The existing and proposed trees within 35 feet of the facilities on both sides of the site shall remain for the life of the project to satisfy the screening objective identified in the findings for approval of each node. The applicant has proposed an amenity tree in the Eastern planter strip to Node 205 which must remain for the life of the project. Any future trimming or pruning of these trees shall be performed by the Department of Public Works only and to their sole discretion. Should any tree be damaged or removed by the applicant or any of their parties or subconsultants they have contracted with, penalties, fines, and replacements trees in existing locations will be enforced.
9. **ANTENNA MODEL NUMBERS, TILTS, AND AZIMUTHS.** The antenna model numbers, tilts, and azimuths for the three (3) WCF nodes shall remain consistent between the permit plans, the reports prepared by Hammett and Edison, and CTC Technology & Energy "Small Cell Application – Palo Alto Vinculums Verizon Cluster 4,". Any additional azimuths or antennas are not approved. Prior to the issuance of streetwork and encroachment permits, any changes in antenna model numbers, tilts, and azimuths shall

be accompanied by updated FCC compliance studies; the City may elect to peer review these reports at the applicant's sole expense.

10. **PLANNED FCC COMPLIANCE DOCUMENTATION.** Prior to the issuance of streetwork and encroachment permits, the applicant shall submit updated FCC compliance studies to the extent that there are any changes to antenna height or other topics that change the analysis presented in the reports prepared by Hammett and Edison; the City may elect to peer review these reports at the applicant's sole expense.
11. **EXPLANATORY AND OTHER SAFETY SIGNAGE.** Signs shall be no larger than necessary. The recommended explanatory signage described in the Reports by Hammett and Edison, as amended by the Fire Department's Condition of Approval 88 & 89, or any other updated Planned FCC Compliance report shall be incorporated into the permit plan set. Signage shall comply with any relevant requirements of California Public Utilities Commission General Order No. 95. All radio frequency signage shall comply with FCC Office of Engineering and Technology Bulletin No. 65 or ANSI C95.2 for color, symbol, and content conventions. All such signage shall at all times provide a working local or toll-free telephone number to its network operations center, and such telephone number shall be able to reach a live person who can exert transmitter power-down control over this Site as required by the FCC.
12. **PERMITTING.** This approval letter, including the associated conditions of approval, shall be printed on the plan sets submitted for encroachment and street work permit review.
13. **PERMITTING BY OTHERS.** This approval does not include approval or permitting by other entities that may have additional permitting authority separate from the City of Palo Alto. This includes future fiber layout permits that connect to this facility.
14. **PLANNING FINAL INSPECTION.** A Planning Final inspection will be required to determine substantial compliance with the approved plans prior to the scheduling of a permit final inspection by the Public Works and/or Building Departments. Any revisions during the construction process must be approved by Planning, including but not limited to; landscaping, equipment, and hard surface locations. Contact the Planning and Development Services to schedule this inspection.
15. **NODE MAINTENANCE.** All aspects of the WCF small cell nodes shall always be well maintained and replaced, if necessary, to the satisfaction of the Director of Planning and Development Services.
16. **MODIFICATIONS TO APPROVED PLANS.** Any modifications, additions and intensification of use (i.e. additional antennas, equipment substitutions, adjustments in location or height) shall require review and approval as specified in the Palo Alto Municipal Code prior to construction.
17. **NOISE ORDINANCE AND NOISE POLICIES.** The WCF nodes shall comply with all noise standards specified in Municipal Code Chapter 9.10.050 and the noise-related policies in Chapter 4 (Natural Environment).
18. **REMOVAL OF ABANDONED EQUIPMENT.** Any components of the WCF nodes that cease to be in use for more than ninety (90) days shall be removed by the applicant, Wireless Communications Service provider, or property owner within ninety (90) days of the cessation of use of that WCF. A new WCF permit shall not be issued to an owner or operator of a WCF or a wireless communication service provider until the abandoned WCF or its component is removed.

19. AS-BUILT PLANS. An as-built set of plans and photographs depicting the entire WCF as modified, including all Transmission Equipment and all utilities, shall be submitted to the Planning Division within ninety (90) days after the completion of construction. **(APPLICANT FOLLOW-UP REQUIRED)**
20. RADIO FREQUENCY EMISSION. The applicant shall hire a radio engineer licensed by the State of California to measure the actual radio frequency emission of the WCF nodes and determine if it meets Federal Communications Commission standards. A report, certified by the engineer, of all calculations, required measurements, and the engineer's findings with respect to compliance with the FCC's radio frequency emission standards shall be submitted to the Planning Division within one year of commencement of operation. The report shall have a methodology section outlining instrumentation, measurement direction, heights and distances, and other protocols outlined in FCC Bulletin OET 65. The report shall include a list and identify any nearby RF sources, nearby reflecting surfaces or conductive objects that could produce regions of field intensification, antenna gain and vertical and horizontal radiation patterns, type of modulation of the site, polarization and emissions orientation(s) of the antenna(s), a log of all equipment used, and a map and list of all locations measured indicating the maximum power observed and the percentage of the FCC Uncontrolled/General Population guidelines at the measurement location. At the applicant's expense, the City may elect to have a City-staff observer during the measurements, may elect to receive raw test measurements by location provided in electronic format to the observer, and may elect to have the report independently peer reviewed prior to report acceptance. Applicant may be required to submit these reports periodically for the life of the project, as determined by the Director of Planning and Development Services. **(APPLICANT FOLLOW-UP REQUIRED)**
21. INDEMNIFICATION. To the extent permitted by law, the applicant shall indemnify and hold harmless the City, its City Council, its officers, employees and agents (the "indemnified parties") from and against any claim, action, or proceeding brought by a third party against the indemnified parties and the applicant to attack, set aside or void, any permit or approval authorized hereby for the Project, including (without limitation) reimbursing the City for its actual attorneys' fees and costs incurred in defense of the litigation. The City may, in its sole discretion and at Applicant's expense, elect to defend any such action with attorneys of its own choice.
22. COMPLIANCE WITH APPLICABLE LAWS. The applicant shall comply with all applicable provisions of the Code, any permit issued under this Code, and all other applicable federal, state and local laws (including without limitation all building code, electrical code and other public safety requirements). Any failure by the City to enforce compliance with any applicable laws shall not relieve any applicant of its obligations under this code, any permit issued under this code, or all other applicable laws and regulations.
23. PERMIT EXPIRATION. The WCF approval shall be valid for a period of one year from the original date of approval. In the event on-site construction under applicable street work and/or encroachment permits has not commenced within the time limit specified above, the approval shall expire and be of no further force or effect. A written request for a one-year extension shall be submitted prior to the expiration date in order to be considered by the Director of Planning and Development Services.
24. REVOCATION. The Director of Planning and Development Services may revoke any WCF permit if the permit holder fails to comply with any condition of the permit. The Director's decision to revoke a permit shall be appealable pursuant to the process applicable to issuance of the permit, as provided in PAMC Section 18.42.110(h), which is pursuant to the process for appeal of architectural review set forth in Section 18.77.070(f).

Office of Transportation

General Conditions for TCPs:

Work hours: 9 am to 4 pm

25. If the driveway to any garage or parking area will need to be closed for permitted construction work, the affected property owner shall be served notice in writing regarding this necessary closure, at least 72 hours in advance. Approval is valid for 6 months from the date of approval.
26. "No Parking - Tow Away" signs must be posted 72 hours in advance. A sign must be placed at each affected parking space.
27. The clear width of the drive lane shall be minimum 10 feet per lane, or 12 feet, if only one lane is provided.
28. The applicant is responsible for notifying Palo Alto Dispatch of temporary lane closures in case of emergency vehicle route access (only for complete road closures).
29. Warning signs should not be placed on the bike lane. These must be placed adjacent to any bike lanes in the roadway or sidewalk. If a bike lane is used as part of the taper, then a "Bike lane closed ahead" sign is required on either side of the where the Bike lane begins. If there is no bike lane, then W11-1 and W16-1P sign required.
30. The applicant must coordinate with other construction work in the area of work to avoid conflict of overlapping project dates. All conflicting signs shall be covered while temporary signs are in place.
31. Any other required signs may have been missed in the review process. It is the contractor's responsibility to follow MUTCD for the safety of residents and workers. The contractor is responsible for coordinating with affected agencies: Law Enforcement; Fire Department; Department of Public Works/Transportation; Rail, Bus, and Transit Companies; Schools; Trash Collection Services; and Emergency Response Services.

Public Works Engineering

32. DOWNTOWN STYLE LIGHTING: Nodes 061 and 204 are located within the Downtown Style boundary. The applicant is required to use the approved decorative luminaries to be painted Munsell RAL5.5GY2.76/2.1 green. This applies to all locations that are within the Downtown boundary. Locations outside of the downtown boundary shall be replaced in kind with a similar style.
33. EASEMENT: All existing easements shall be indicated on plan submittal to Public Works for necessary permits. Any proposed items in existing Public Utility Easement areas shall be approved by CPA Utilities and Public Works Engineering.
34. DEMOLITION PLAN: Excavation activities associated with the proposed scope of work shall occur no closer than 10-feet from any existing street trees, or as approved by the Urban Forestry Division (contact 650-496-5953). Any changes shall be approved by Public Works.

35. **WORK IN THE RIGHT-OF-WAY:** The plans must clearly indicate any work that is proposed in the public right-of-way, such as sidewalk replacement, driveway approach, or utility laterals. The plans must include notes that the work must be done per City standards and that the contractor performing this work must first obtain a Street Work Permit from Public Works at the Development Center.
36. A permanent encroachment permit will be required for all equipment that is to be installed in the public right-of-way.
37. Public Works shall determine the number of encroachment permits and associated street work permits, if any, that can be processed in a batch. The applicant will be required to apply for all necessary permits including: Street Work and Encroachment Permit applications. All required applications shall be in the submittal package for Public Works. These necessary permit applications and requirements are available from Public Works on our website: <https://www.cityofpaloalto.org/Departments/Public-Works/Engineering-Services/Forms-and-Permits>.
38. The location of proposed pull boxes will be reviewed and determined on a location basis.
39. **SIDEWALK, CURB & GUTTER.** In the event existing sidewalks, curbs, gutters, driveway approaches, or street areas in the public right-of-way are disturbed as part of this project, the applicant shall repair or replace those sidewalks, curbs, gutters, driveway approaches, or street areas as directed by and to the satisfaction of the City Engineer. Contact Public Works inspector at 650-496-6929 to arrange a site visit so that the inspector can discuss the extent of replacement work along the public road. The site plan submitted with the building/streetwork/encroachment permit plan set must show the extent of the replacement work.
40. All trench work and placement of fiber optic conduit shall adhere to City of Palo Alto Public Works specifications. Refer to City of Palo Alto Public Works Conduit Location Detail Telecommunications Drawing No. 402. This detail will provide specifics for placement of conduit in both residential and commercial areas. Any deviation from City Standards and Regulations must be approved by Public Works and all other applicable Departments.
41. **STORM WATER POLLUTION PREVENTION:** The City's full-sized "Pollution Prevention - It's Part of the Plan" sheet must be included in the plan set. Copies are available from Public Works on our website <http://www.cityofpaloalto.org/civicax/filebank/documents/2732>.
42. 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's 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.
43. **STREET WORK AND ENCROACHMENT PERMIT APPLICATION SUBMITTAL.** Applicants are required to create an account and submit applications in the form of a preapplication. These preapplications will have an associated pre-application number. Online Permitting Services Process (Pre-application):

- Become an Accela Citizen Access registered user. Simply head to Accela Citizen Access, and register with your email address. You'll receive a confirmation email in your inbox.
<https://aca.accela.com/PALOALTO/Account/RegisterDisclaimer.aspx>
- Complete a pre-application, which includes submitting your plans, documents, and other project-related materials. Staff will review your materials to ensure your file contains all the materials necessary for your project to be reviewed.
- Once your project has everything needed, it will move on from being a pre-application to a full application (street-work or encroachment). Your assigned PW staff reviewer will reach out with your permit number and status. Long term encroachment permittee will be updated to facility owner/responsible party (not contractor); insurance per City standards will also be required from permittee.

44. Applicant may be required to submit a detailed cost estimate breakdown for proposed scope of work prior to permit issuance. Public Works review will request after review of estimated work cost on permit applications.

Public Works – Urban Forestry

45. TREE PROTECTION COMPLIANCE. The owner and contractor shall implement all protection and inspection schedule measures as a condition of the building permit, Sheet T-1, and is subject to code compliance action pursuant to PAMC 8.10.080. The required protective fencing shall remain in place until final landscaping and inspection of the project. The fencing shall contain required warning sign and remain in place until final inspection of the project. Tree fencing shall be adjusted after demolition if necessary, to increase the tree protection zone as required by the project arborist.
46. TREE DAMAGE. Tree Damage, Injury Mitigation and Inspections apply to Contractor. Reporting, injury mitigation measures and arborist inspection schedule (1-5) apply pursuant to TTM, Section 2.20-2.30. Contractor shall be responsible for the repair or replacement of any publicly owned or protected trees that are damaged during the course of construction, pursuant to Title 8 of the Palo Alto Municipal Code, and city Tree Technical Manual, Section 2.25.
47. GENERAL. The following general tree preservation measures apply to all trees to be retained: No storage of material, topsoil, vehicles or equipment shall be permitted within the tree enclosure area. The ground under and around the tree canopy area shall not be altered. Trees to be retained shall be irrigated, aerated and maintained as necessary to ensure survival.
48. EXCAVATION RESTRICTIONS APPLY (TTM, Sec. 2.20 C & D). Any approved grading, digging or trenching beneath a tree canopy shall be performed using 'air-spade' method as a preference, with manual hand shovel as a backup. For utility trenching, including sewer line, roots exposed with diameter of 1.5 inches and greater shall remain intact and not be damaged. If directional boring method is used to tunnel beneath roots, then Table 2-1, Trenching and Tunneling Distance, shall be printed on the final plans to be implemented by Contractor.
49. TREE REPLACEMENT. Tree #1 at 1221 Middlefield Road (inventoried as Street Tree Site F2 at 1211 Middlefield Road), shall be replaced with two 24" box trees to comply with Table 3-1 of the Tree Technical Manual (replacement ratios), <https://www.cityofpaloalto.org/files/assets/public/planning-and-development-services/tree-preservation/tree-program-downloads/tree-technical-manualsections/tree-technical-manual.orgcivicaxfilebankdocuments6436.pdf>. One 24" box Littleleaf

Linden shall be planted at the proposed site location and one payment of \$650 shall be made to the Forestry Fund in lieu of planting a second tree.

50. Ensure all Tree Disclosure Statements on Sheet T-1 of the Tree Protection sheets are completed and signed.

Public Works – Electrical Utilities

51. The applicant shall update their detail for the Downtown Style light pole schematic to show the height of decorative base being 35-13/16-inches tall as shown on the Palo Alto Style Placement Guide.
52. The applicant shall update their detail for the Downtown Style light pole style to have a four (4) foot mast arm with a 30-inch rise as shown on the Palo Alto Style Placement Guide.
53. The applicant shall comply with all the Electric Utility Engineering Department service requirements noted during plan review.
54. The applicant shall be responsible for identification and location of all utilities, both public and private, within the work area. Prior to any excavation work at the site, the applicant shall contact Underground Service Alert (USA) at 1-800-227-2600, at least 48 hours prior to beginning work.
55. The applicant shall submit a request to disconnect all existing utility services and/or meters including a signed affidavit of vacancy, on the form provided by the Building Inspection Division. Utilities will be disconnected or removed within 10 working days after receipt of request. The demolition permit will be issued after all utility services and/or meters have been disconnected and removed.
56. MASTER LICENSE AGREEMENT. Each WCF small cell node will comply at all times with the terms and conditions in the Master License Agreement for Use of City-Controlled Space on Utility Poles and Streetlight Poles and in Conduits (“MLA”) between the City of Palo Alto and GTE Mobilnet of California Limited Partnership, DBA Verizon Wireless executed on June 26, 2016. A security instrument, such as a Performance Bond or Letter of Credit, shall be provided in accordance with Section 14.0 of the Master License Agreement prior to encroachment or street work permit issuance.
57. All sites shall include pole loading calculations.
58. Applicant shall install an inter duct of suitable size inside the street lighting pole, if hard wiring is to connect to one of the antenna system/facilities. Applicant must keep antenna/proposed equipment’s electric circuitry completely separate from utility’s street lighting circuit.

THE FOLLOWING SHALL BE INCORPORATED IN SUBMITTALS FOR ELECTRIC SERVICE

59. A completed Electric Load Sheet and a full set of plans must be included with all applications involving electrical work. The load sheet must be included with the preliminary submittal.
60. Industrial and large commercial customers must allow enough lead-time for Electric Utility Engineering and Operations (typically 8-12 weeks after advance engineering fees have been paid) to design and construct the electric service requested.

61. Only one electric service lateral is permitted per parcel.
62. The customer shall install all electrical substructures (conduits, boxes and pads) required from the service point to the customer's switchgear. The design and installation shall be according to the City standards and shown on plans.
63. Location of the electric panel/switchboard shall be shown on the site plan and approved by the Utilities Department.
64. The customer is responsible for sizing the service conductors and other required equipment according to the National Electric Code requirements and the City standards.
65. Any additional facilities and services requested by the Applicant that are beyond what the utility deems standard facilities will be subject to Special Facilities charges. The Special Facilities charges include the cost of installing the additional facilities as well as the cost of ownership.
66. Projects that require the extension of high voltage primary distribution lines or reinforcement of offsite electric facilities will be at the customer's expense and must be coordinated with the Electric Utility.

DURING CONSTRUCTION

67. Contractors and developers shall obtain permit from the Department of Public Works before digging in the street right-of-way. This includes sidewalks, driveways, and planter strips.
68. At least 48 hours prior to starting any excavation, the customer must call Underground Service Alert (USA) at 1-800-227-2600 to have existing underground utilities located and marked. The areas to be check by USA shall be delineated with white paint. All USA markings shall be removed by the customer or contractor when construction is complete.
69. The customer is responsible for installing all on-site substructures (conduits, boxes and pads) required for the electric service. No more than 270 degrees of bends are allowed in a secondary conduit run. All conduits must be sized according to National Electric Code requirements and no 1/2 – inch size conduits are permitted. All off-site substructure work will be constructed by the City at the customer's expense. Where mutually agreed upon by the City and the Applicant, all or part of the off-site substructure work may be constructed by the Applicant.
70. All primary electric conduits shall be concrete encased with the top of the encasement at the depth of 30 inches. No more than 180 degrees of bends are allowed in a primary conduit run. Conduit runs over 500 feet in length require additional pull boxes.
71. All new underground conduits and substructures shall be installed per City standards and shall be inspected by the Electrical Underground Inspector before backfilling.
72. Meter and switchboard requirements shall be in accordance with Electric Utility Service Equipment Requirements Committee (EUSERC) drawings accepted by Utility and CPA standards for meter installations.
73. Shop/factory drawings for switchboards (400A and greater) and associated hardware must be submitted for review and approval prior to installing the switchgear to:

Gregory McKernan, P.E.
Power Engineer
Utilities Engineering (Electrical)
1007 Elwell Court Palo Alto, CA 94303

74. Catalog cut sheets may not be substituted for factory drawing submittal.

Public Works – Water, Gas, Wastewater

75. The contractor shall contact underground service alert (800) 227-2600 one week in advance of starting excavation to provide for marking of underground utilities.
76. The contractor shall provide potholing and verify the exact location of existing and abandoned utilities, inverts, depth and elevations to confirm the horizontal and vertical alignment of the new conduits crossing the streets. The project engineer must report to Utilities Engineering any proposed underground work that conflicts with existing WGW utility services/mains.
77. The applicant shall provide a cross section or profile showing the proposed vertical alignment for the (N) conduits and the crossing of existing underground utilities. The profile must be drawn to scale with approximate depths of (e) pipes.
78. The applicant shall provide protection for utility lines subject to damage. Utility lines within a pit or trench shall be adequately supported. All exposed water, gas, and sewer lines shall be inspected by the WGW Utilities Inspector prior to backfilling.
79. When trenching: For crossing utilities the contractor shall maintain 12" clear, above and below, from the existing utilities to new underground facilities. For parallel utilities maintain minimum 3' clear horizontal (not diagonal) separation.
80. When boring new pipes or conduits: the pilot bore hole shall be 24" clear from any existing WGW utility pipes and all existing utility crossings shall be potholed prior to starting work. For parallel utilities maintain minimum 5' clear horizontal (not diagonal) separation.
81. PLAN MODIFICATION. The applicant shall relocate their proposed fiber vaults away from gas service/line per requirements on page A-1.4 (1221 Middlefield Rd). Utility vaults, transformers, utility cabinets, concrete bases, or other structures cannot be placed over existing water, gas or wastewater mains/services. Maintain 1' horizontal clear separation from the vault/cabinet/concrete base to existing utilities as found in the field. If there is a conflict with existing utilities, Cabinets/vaults/bases shall be relocated from the plan location as needed to meet field conditions.
82. All utility work/installations shall be in accordance with the City of Palo Alto utility standards for water, gas & wastewater.
83. All WGW utility work shall be inspected and approved by the WGW utilities inspector. Inspection costs shall be paid by the applicant's contractor prior to starting work. Schedule WGW utilities inspections at 650/566-4504 five working days before start of constructions.

84. The applicant's contractor shall immediately notify the Utilities Department (650) 496-6982 or 650/329-2413 if the existing water, wastewater or gas mains/services/laterals are disturbed or damaged.
85. No water or gas valves or other facilities owned by Utilities Department shall be operated for any purpose by the applicant's contractor. All required operation will only be performed by authorized utilities department personnel. The applicant's contractor shall notify the Utilities Department not less than forty-eight (48) hours in advance of the time that such operation is required.
86. The contractor shall not disconnect any part of the existing water, gas, or wastewater mains except by the express permission of the WGW utilities inspector and shall submit a schedule of the estimated shutdown time to obtain said permission.
87. Any repairs needed to utility gas infrastructure as a result of construction in the right of way shall only be performed by the City's Utility Operations team, (650) 496 – 6982.

Fire Department

88. Warning signage is needed to warn workers on nearby trees and utility poles of the potential RF exposure exceeding the public exposure limit for work on adjacent trees and utility lines. Warning signs shall be placed around the trunk of any immediately adjacent trees and the base of any immediately adjacent utility poles. As trees grow, the exposure of a tree worker may change over time, so the application of signage shall be reviewed by the Fire Department and applicant as directed by the Fire Department, not more than once every three years.
89. Signage needs to be readily visible on all sides of the proposed light pole at eight (8) feet to 10 feet in height. A Blue Category Two notice is acceptable. The notice shall specify locations (height and distance from the antennas) where excessive RF exposure can occur. Signs posted on trees shall not cause harm to the trees, e.g. using elastic straps.