Initial Study/Negative Declaration

Wireless Telecommunication Facilities Development Standards and Design Guidelines

Prepared for:
City of Los Altos
1 North San Antonio Road
Los Altos, CA 94022

Prepared by:
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437 Alcatraz Avenue
Oakland, CA 94609

January 26, 2022

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PROPOSED NEGATIVE DECLARATION

The City of Los Altos is considering the project identified below and has proposed the following Negative Declaration pursuant to the California Environmental Quality Act:

1. Project Title: Wireless Telecommunications Facilities Ordinance and Design Guidelines

2. Lead Agency: City of Los Altos

3. Contact Person: Gabriel Engeland, City Manager

City of Los Altos
One North San Antonio Road
Los Altos, CA 94022
(650) 947-2632

4. Project Location: Citywide

5. Project Description: The proposed project involves revisions to the City of Los Altos' existing standards for development of wireless telecommunications facilities, including an ordinance to regulate permissible locations and preferences for the location of wireless facilities. These locational standards, which would replace the locational standards now provided in City of Los Altos Resolution No. 2019-35, would be adopted by ordinance into Chapter 11.82 of the Los Altos Municipal Code.

In addition, the City proposes to expand and supplement existing development standards and design guidelines and preferences for wireless telecommunications facilities contained in Resolution No. 2019-35 by (1) adding a set of basic design principles that would apply to all wireless telecommunications facilities and (2) identifying configuration preferences along with design guidelines for specific types of wireless facilities.

6. Proposed Findings: The Initial Study prepared for the proposed Wireless Telecommunications Facilities Development Standards and Design Guidelines indicates for each environmental issue it analyzed that environmental impacts would be less than significant or that no impact would occur. There is no substantial evidence, in light of the whole record before the lead agency (the City of Los Altos), that the project may have a significant effect on the environment.

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PROJECT INFORMATION

1. Project Title:	Wireless Telecommunications Facilities Ordinance and Design Guidelines
2. Lead Agency:	City of Los Altos
3. Contact Person:	Gabriel Engeland, City Manager City of Los Altos One North San Antonio Road Los Altos, CA 94022 (650) 947-2632
4. Project Location:	Citywide
5. Project Sponsor:	City of Los Altos
6. General Plan Designations:	Citywide
7. Zoning:	Citywide
8. Project Description:	The proposed project involves revisions to the City of Los Altos' existing standards for development of wireless telecommunications facilities, including an ordinance to regulate permissible locations and preferences for the location of wireless facilities. These locational standards, which would replace the locational standards now provided in City of Los Altos Resolution No. 2019-35, would be adopted by ordinance into Chapter 11.82 of the Los Altos Municipal Code. In addition, the City proposes to expand and supplement existing development standards and design guidelines and preferences for wireless telecommunications facilities contained in Resolution No. 2019-35 by (1) adding a set of basic design principles that would apply to all wireless telecommunications facilities and (2) identifying configuration preferences along with design guidelines for specific types of wireless facilities
9. Other Agency Approvals:	Adoption of updated standards and guidelines for development and design of wireless telecommunications facilities does not require any public agency approvals other than that of the City of Los Altos.

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INITIAL STUDY

1.0 INTRODUCTION

1.1 APPLICABLE REQUIREMENTS OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The City of Los Altos proposes to update its standards for development of wireless telecommunications facilities, including (1) locational requirements and preferences, and (2) development standards and design guidelines in the form of an ordinance and revisions to City of Los Altos Resolution No. 2019-35, *Design and Siting Guidelines and Standards for Wireless Facilities,* both of which require discretionary actions to be taken by the City of Los Altos. Thus, the wireless telecommunications facilities development standards and design guidelines being considered by the City constitute a "project" that is subject to the California Environmental Quality Act (CEQA) (Public Resources Code §§21000-21177). State CEQA Guidelines §15063 requires the City to undertake preparation of an Initial Study to determine if the proposed wireless telecommunications facilities standards would have one or more significant effects on the environment.

If, as a result of the analysis and findings contained in this Initial Study, the City determines that the proposed wireless telecommunications facilities standards would not have a significant effect on the environment, either as proposed (or as modified to include any mitigation measures needed to avoid or reduce otherwise significant effects of the development standards and design guidelines), the City would prepare a Negative Declaration (or Mitigated Negative Declaration). Such a determination would be made only if "there is no substantial evidence in light of the whole record before the Lead Agency" that significant impacts would not occur as the result of the proposed project (Public Resources Code §21080[c]).

Alternatively, if the City would find that there is evidence that any aspect of the proposed development standards and design guidelines may cause a significant physical environmental effect; preparation of an Environmental Impact Report (EIR) would be required to analyze project-related and cumulative environmental impacts.

1.2 PURPOSE AND CONTENT OF THIS INITIAL STUDY

This Initial Study has been prepared in accordance with CEQA and CEQA Guidelines to inform public agency decision-makers and the general public of the environmental effects of the wireless telecommunications facilities development standards and design guidelines being considered by the City and to identify possible ways to avoid or minimize any significant environmental effects that might result. This Initial Study does not recommend approval or denial of proposed development standards and design guidelines or determine whether the

standards and guidelines, or any particular aspect thereof, are "good" or "bad." Its purpose is to provide information regarding the physical environmental changes that would result from the wireless telecommunications facilities locational standards and design guidelines being considered by the City.

CEQA Guidelines §15063(d) requires an Initial Study to contain in brief form:

(1) A description of the project including the location of the project;

(2) An identification of the environmental setting;

(3) An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;

(4) A discussion of ways to mitigate identified significant effects, if any;

(5) An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and

(6) The name of the person or persons who prepared or participated in the Initial Study.

1.3 AVAILABILITY OF DOCUMENTS USED IN PREPARATION OF THIS INITIAL STUDY

Both hard copy documents and online resources were used to prepare this Initial Study. The URL for each online resource and the date it was accessed is provided in the reference sections of this Initial Study. The hard copy documents identified in the reference sections of this document that were used to prepare this Initial Study are available for review at the City of Los Altos City Manager's office located at One North San Antonio Road, Los Altos, CA 94022 or on the City of Los Altos Website:

Home Page | City of Los Altos California

2.0 PROJECT DESCRIPTION

2.1 LOCATION

The City of Los Altos is located in the northwest portion of Santa Clara County, approximately 5 miles west of the San Francisco Bay within the southern portion of the San Francisco peninsula. Los Altos is surrounded by the cities of Mountain View and Palo Alto to the north, Sunnyvale to the east, Cupertino to the south, and Los Altos Hills to the west. Figure 1 depicts the City's location.

2.2 PROJECT CHARACTERISTICS

Current regulation of wireless telecommunications facilities within the City of Los Altos is provided in two documents:

- City of Los Altos Resolution No. 2019-35, *Design and Siting Guidelines and Standards for Wireless Facilities*, which provides design guidelines and locational standards for the installation of wireless facilities within the City.
- City of Los Altos Municipal Code Chapter 11.12, *Wireless Facilities*, which addresses wireless telecommunications facility permit requirements and sets forth standard conditions of approval for such facilities.

The City of Los Altos is proposing revisions to its existing standards for development of wireless telecommunications facilities, including a new wireless ordinance to regulate the permissible location of wireless facilities along with revisions to Municipal Code Chapter 11.12 modifying permit requirements. These locational standards would replace those now provided in Resolution No. 2019-35. In addition, the City proposes to expand development standards and design guidelines and preferences for wireless telecommunications facilities.

The proposed development standards and design guidelines would modify existing criteria for the location and design of wireless telecommunications facilities within the City of Los Altos. The precise number, location, and design of wireless telecommunications facilities that would be requested pursuant to proposed development standards and design guidelines cannot be known at this time. Requests for installation of wireless telecommunications facilities would be evaluated at such time as site-specific applications are submitted to the City.

2.2.1 Proposed Revisions to Standards and Preferences for the Location of Wireless Telecommunications Facilities in the City of Los Altos

Proposed revisions to permitted locations for wireless telecommunications facilities are summarized in Table A, below. Permitted locations for locations for wireless telecommunications facilities are illustrated in Figure 2 (Existing Permitted Locations) and Figure 3 (Proposed Permitted Locations).

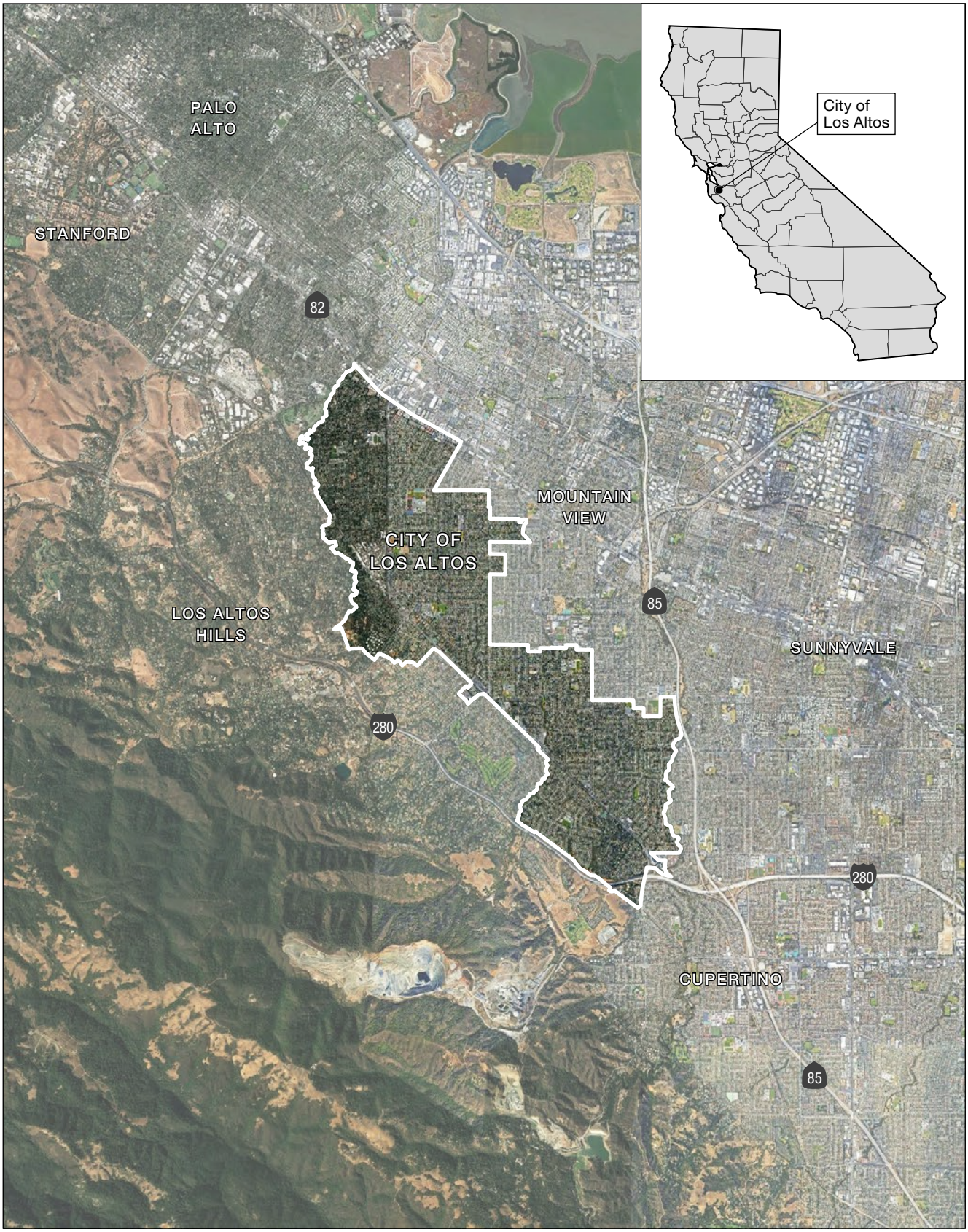

Figure 1

City of Los Altos Location

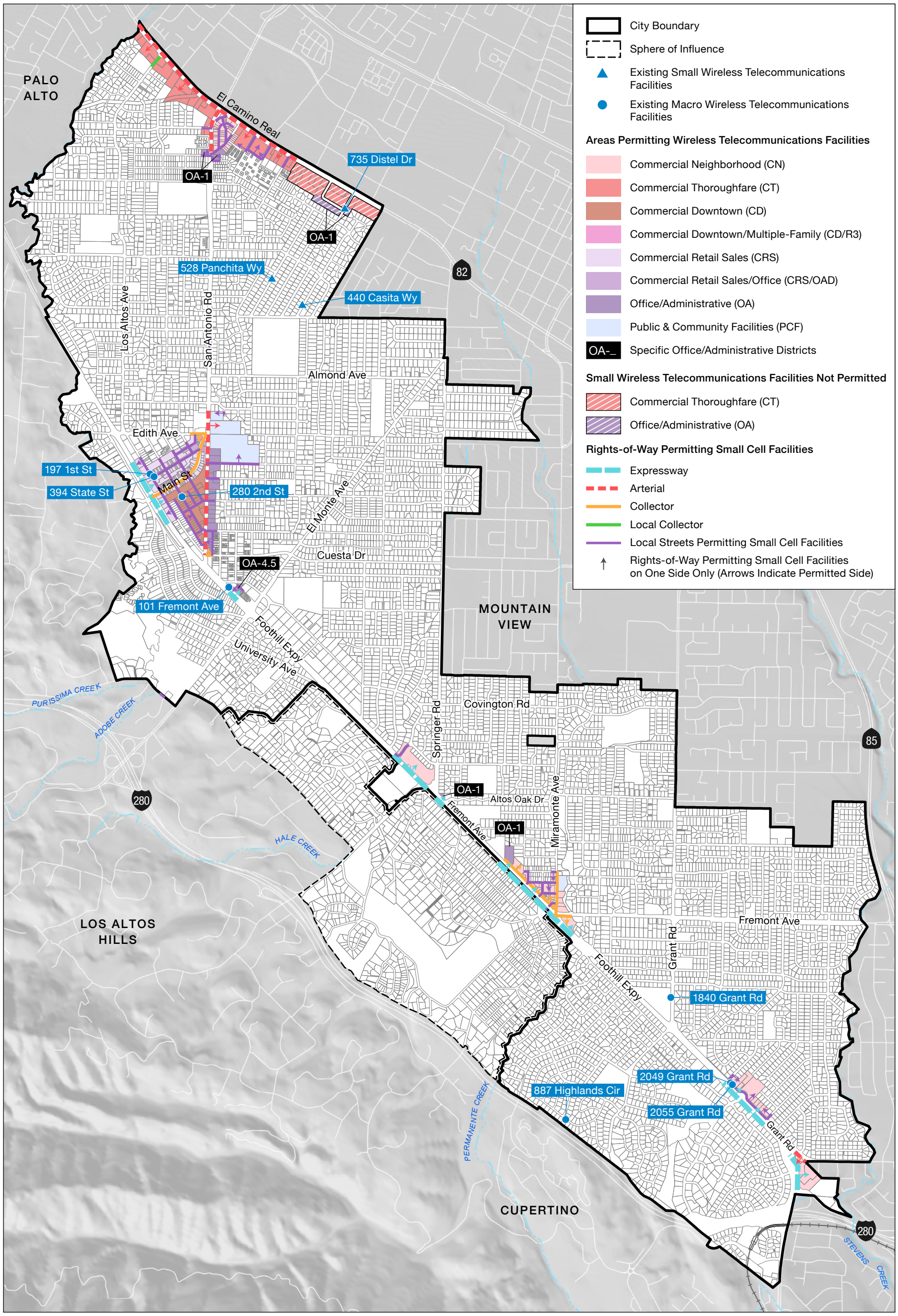

Figure 2

Existing Permitted Locations

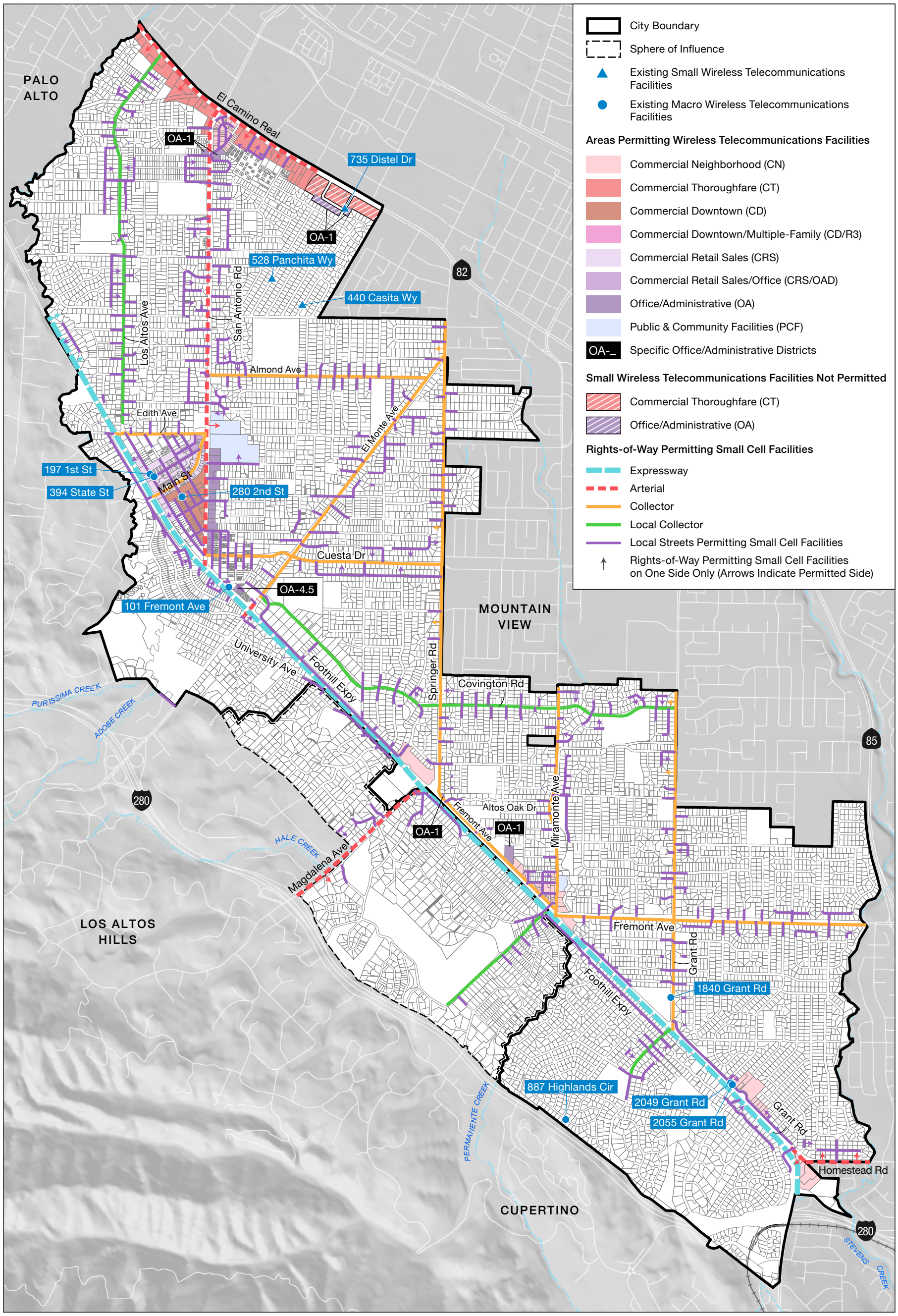

Figure 3

Proposed Permitted Locations

TABLE A: EXISTING AND PROPOSED PERMITTED LOCATIONS FOR WIRELESS TELECOMMUNICATIONS FACILITIES

Existing Permitted Locations	Proposed Permitted Locations
Permitted Locations for Wireless Telecommunications Facilities on Properties Outside of Roadway Rights-of-Way and Public Easements	
Wireless telecommunications facilities are currently permitted within non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010. K. Office-Administrative (OA); L. Office-Administrative (OA-1 and OA-4.5); N. Commercial Neighborhood (CN); O. Commercial Downtown (CD); P. Commercial Retail Sales (CRS); Q. Commercial Thoroughfare (CT); R. Commercial Retail Sales/Office (CRS/OAD); S. Public and Community Facilities (PCF); and V. Loyola Corners Specific Plan Overlay (LCSPZ).	Wireless telecommunications facilities will continue to be permitted within non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010. K. Office-Administrative (OA); L. Office-Administrative (OA-1 and OA-4.5); N. Commercial Neighborhood (CN); O. Commercial Downtown (CD); P. Commercial Retail Sales (CRS); Q. Commercial Thoroughfare (CT); R. Commercial Retail Sales/Office (CRS/OAD); S. Public and Community Facilities (PCF); and V. Loyola Corners Specific Plan Overlay (LCSPZ).
Wireless telecommunications facilities are also permitted within the mixed-use zoning district identified in the following subsection of Municipal Code Section 14.04.010 provided they are no closer than 500 feet from any residential dwelling unit. M. Commercial Downtown/Multiple Family (CD/R-3)	Wireless telecommunications facilities are proposed to no longer be permitted within the permitted within the CD/R-3 zoning district.
Permitted Locations for Wireless Telecommunications Facilities Within Roadway Rights-of-Way and Public Easements	
Only small wireless telecommunications facilities are currently permitted within public rights-of-way and easements. Small wireless telecommunications facilities are currently permitted adjacent to non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010. K. Office-Administrative (OA); L. Office-Administrative (OA-1 and OA-4.5); N. Commercial Neighborhood (CN); O. Commercial Downtown (CD); P. Commercial Retail Sales (CRS); Q. Commercial Thoroughfare (CT); R. Commercial Retail Sales/Office (CRS/OAD); S. Public and Community Facilities (PCF); and V. Loyola Corners Specific Plan Overlay (LCSPZ).	Only small wireless telecommunications facilities are currently permitted within public rights-of-way and easements. Small wireless telecommunications facilities are proposed to be permitted within the following

Existing Permitted Locations	Proposed Permitted Locations
Wireless telecommunications facilities are also permitted within public rights-of-way and easements adjacent to the mixed-use zoning district identified in the following subsection of Municipal Code Section 14.04.010 provided they are no closer than 500 feet from any residential dwelling unit. M. Commercial Downtown/Multiple Family (CD/R-3)	roadway types regardless of the zoning districts of adjacent lands: • Expressways • Arterials • Collectors • Local Collectors Wireless telecommunications facilities are also proposed to be permitted within public rights-of-way of local streets that are: • Adjacent to zoning districts permitting wireless telecommunications facilities on private property ○ Local non-residential streets (Municipal Code Sections 14.04.010 K-L, N-S, V) ○ Local residential streets (Municipal Code Sections 14.04.010 A-J, M, U, W), provided they are located within: ▪ 200 feet of the Foothill Expressway right-of-way; ▪ 500 feet of the San Antonio Avenue, El Monte Drive, Magdalena Avenue, or Homestead Road right-of-way; or ▪ 300 feet of a Collector or Local Collector right-of-way.
Wireless telecommunications facilities are currently permitted within public easements adjacent to non-residential zoning districts permitting wireless telecommunications facilities,	No changes in the permitted location of telecommunications facilities are currently permitted within public easements are proposed.
Other Locational Standards for Wireless Telecommunications Facilities	
Small wireless telecommunications facilities are required to be located no closer than **1,500** feet from any other small wireless telecommunications facility.	Small wireless telecommunications facilities are required to be located no closer than **1,000** feet from any other small wireless telecommunications facility.
Wireless telecommunications facilities are currently prohibited within 500 feet of a school within the Public Facilities District (Municipal Code §14.04.010 S).	The required setback for wireless telecommunications facilities is proposed to be removed.

In addition to specifying *permitted locations* for wireless telecommunications facilities as shown in Table A, the City's existing and proposed development standards also establish specific preferences among the various permitted locations. Proposed revisions to *locational preferences* for wireless telecommunications facilities are summarized in Table B, below.

TABLE B: EXISTING AND PROPOSED PERMITTED LOCATIONAL PREFERENCES FOR WIRELESS TELECOMMUNICATIONS FACILITIES

Existing Locational Preferences	Proposed Locational Preferences
Locational Preferences for Wireless Telecommunications Facilities on Properties Outside of Roadway Rights-of-Way and Public Easements	
The order of preference for the location of wireless telecommunications facilities from most preferred to least preferred is: 1. Commercial Districts (Office-Administrative [OA, OS-1, OA-4.5], Commercial [CD, CRS, CT, CRS/OAD) and the Loyola Corners Specific Plan 2. Public Facilities District (PCF)	The preferred locations for wireless telecommunications facilities include properties within non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, N-S, V) Less preferred locations for wireless telecommunications facilities include any City-owned property and properties within one of the following Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010. N. Commercial Neighborhood District (CN); and S. Public and Community Facilities District (PCF). T. Public and Community Facilities/Single-Family District (PCF/R1-10)
Locational Preferences for Wireless Telecommunications Facilities within Roadway Rights-of-Way and Public Easements	
The order of preference for the location of wireless telecommunications facilities from most preferred to least preferred is: 1. Commercial Districts (Office-Administrative [OA, OS-1, OA-4.5], Commercial [CD, CRS, CT, CRS/OAD) and the Loyola Corners Specific Plan 2. Public Facilities District (PCF)	Preferred location for wireless telecommunications facility within a public right-of-way or public utility easement include rights-of-way for: • Expressways, Arterials, and Collectors fronting non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, N-S, V) • Collectors fronting the Public and Community Facilities District (PCF) (Municipal Code Section 14.04.010 S). Less preferred location for wireless telecommunications facility within a public right-of-way or public utility easement include the following rights-of-way and easements: • Local Collectors fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V) • Public utility easements fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V) • Local streets fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V) • Expressways, Arterials, and Collectors fronting Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W)

Existing Locational Preferences	Proposed Locational Preferences
	To avoid concentration of facilities along any one street within the City, small wireless telecommunications facilities may also be located within the rights-of-way for local streets fronting Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) where the facility would be within: • 200 feet of the Foothill Expressway right-of-way • 500 feet of the San Antonio Avenue, El monte Drive, Magdalena Avenue, or Homestead Road right-of-way; or • 300 feet of a Collector or Local Collector right-of-way.
Requirements for Approval of Less Preferred Locations	
None.	As proposed, applications that involve less-preferred locations may be approved only if: 1. No preferred location exists within 500 feet from the proposed site; or 2. Any preferred location within 500 feet from the proposed site would be technically infeasible. The burden of proof for demonstrating that either of these two conditions exists is on the applicant and must be satisfied with clear and convincing evidence. Applications that involve a less-preferred location are proposed to be required to be accompanied by clear and convincing written evidence demonstrating the need for approval of the proposed location rather than a more preferred location. The proposed ordinance specifically grants the City authority to hire an independent consultant at the applicant's expense to evaluate the need for the proposed less-preferred location.
Provisions for Approval of a Wireless Telecommunications Facility when no Permitted (Preferred or Less Preferred) Site could Provide Adequate Coverage	
Municipal Code Section 11.12.090 permits exceptions to wireless telecommunications standards, including, but not limited to, exceptions from findings that would otherwise justify denial, m if the city makes the finding that: 1. Denial of the facility as proposed would violate federal law, state law, or both; or 2. A provision of this chapter, as applied to applicant, would deprive applicant of its rights under federal law, state law, or both.	The proposed ordinance deletes the exception provisions contained in Municipal Code Section 11.12.090. The proposed ordinance also includes a provision that would allow for approval of a small wireless telecommunications facility within the right-of-way of a local residential street that is neither a preferred nor a less preferred location if: 1. A combination of macro and small wireless telecommunications facilities, as well as colocation with existing facilities of other carriers at preferred

Existing Locational Preferences	Proposed Locational Preferences
The burden for proving that denial of the facility as proposed would violate federal law, state law, or would deprive applicant of its rights under federal law, state law, or both, using the evidentiary standards required by that law at issue, rests with the applicant. This section of the Municipal Code explicitly permits the city to hire an independent consultant, at the applicant's expense, to evaluate the issues raised by the exception request and submit rebuttal evidence to refute the applicant's claim.	and less preferred locations within the City would not provide adequate coverage; and 2. The total number of wireless telecommunications facilities within Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) would be minimized.

2.2.2 Proposed Revisions to Guidelines and Preferences for the Design of Wireless Telecommunications Facilities in the City of Los Altos

a. Existing Guidelines and Preferences for the Design of Wireless Telecommunications Facilities

Resolution No. 2019-35 identifies the following order of preference for the configuration of wireless telecommunication facilities from most preferred to least preferred:

1. Collocation with existing wireless facilities.
2. Roof-mounted.
3. Building-mounted.
4. Mounted on an existing pole or utility pole.
5. Mounted on a pole or utility pole that will replace an existing pole or utility pole.
6. Mounted on a new telecommunication tower.

The resolution does not include specific requirements or criteria for approval of a less preferred design configuration.

Resolution No. 2019-35 addresses the aesthetics of new wireless telecommunications facilities within the City, including design guidelines applying to apply to all wireless telecommunications facilities regardless of their location, along with additional guidelines applying specifically to facilities located on properties outside the public right-of-way and public utility easements and facilities located within the public right-of-way and public utility easements.

- Section 5 of Resolution No. 2019-35 apply to all wireless telecommunications facilities regardless of their location. In general, this section of the Resolution states that all

wireless telecommunications facilities be "designed and maintained so as to minimize visual, noise, and other impacts on the surrounding community."

Key provisions addressing the aesthetics of all new wireless telecommunications facilities within the City include:

- Screening and camouflage design techniques are to be employed to ensure that the facility is as visually inconspicuous as possible, to prevent the facility from dominating the surrounding area, and to hide the facility from predominant views from surrounding properties. The design of wireless telecommunications facilities is to be compatible with the community (Section 5C).
- Wireless telecommunications facilities are to "use the least visible antennas possible to accomplish the coverage objectives" (Section 5E).
- "Where appropriate, facilities shall be installed so as to maintain and enhance existing landscaping on the site, including trees, foliage, and shrubs, whether or not utilized for screening." Additional landscaping shall be planted, irrigated, and maintained where such vegetation as needed to provide screening or to block the line of sight between facilities and adjacent uses (Section 5F).

- Section 6 of Resolution No. 2019-35 imposes design and development standards for wireless telecommunications facilities located outside the public right-of-way and public utility easements in addition to set forth in Section 5 for all facilities.

  Key provisions addressing the aesthetics of new wireless telecommunications facilities on properties outside the public right-of-way and public utility easements the City include:

  - Roof-mounted facilities are to be designed and constructed to be fully concealed or screened in a manner compatible with the existing architecture of the building the facility is mounted to in color, texture, and type of material. Screening is not permitted to increase the bulk of the structure or alter the character of the structure (Section 6C).
  - Monopole installations are to be situated so as to utilize existing natural or man-made features including topography, vegetation, buildings, or other structures to "provide the greatest amount of visual screening" (Section 6D).
  - If a faux tree is proposed for the monopole installation, it is to be of a type of tree compatible with those existing in the immediate areas of the installation. If no trees exist within the immediate areas, a landscape setting that integrates the faux tree with added species of a similar height and type is to be created (Section 6D).
  - All accessory equipment associated with the operation of any wireless telecommunications facility shall be fully screened or camouflaged and located in a manner to minimize its visibility to the greatest extent possible (Section 6E).

- Section 7 of Resolution No. 2019-35 applies to wireless telecommunications facilities located within roadways and other public rights-of-way. These standards are in addition to the design and development standards that apply to all facilities, as set forth in Section 5 of Resolution No. 2019-35.

  Key provisions addressing the aesthetics of new wireless telecommunications facilities public rights-of-way and public utility easements the City include:

  - Only pole-mounted antennas are permitted within the right-of-way. All other telecommunications towers are prohibited, and no new poles are permitted that are not replacing an existing pole.
  - Replacement poles are to match the appearance of the original pole to the extent feasible, unless another design would better accomplish the design objectives of Resolution No. 2019-35 Section 7C.
  - Replacement poles are not permitted to exceed the height of the pole being replacing by more than 7 feet.
  - All antennas are to be shrouded.
  - With the exception of the electric meter, which is required to be pole mounted to the extent feasible, all accessory equipment is be located underground to the extent feasible. Required electrical meter cabinets are to be adequately screened and camouflaged (Section 7G).
  - Disturbance of existing topography and on-site vegetation is to be minimized unless such disturbance would substantially reduce the visual impacts of the facility.

b. Proposed Guidelines and Preferences for the Design of Wireless Telecommunications Facilities

Proposed Design Guidelines for wireless telecommunications facilities retain, reorganize, and supplement existing guidelines by adding a set of basic design principles that apply to all wireless telecommunications facilities, and identifying configuration preferences along with design guidelines for specific types of wireless facilities.

Basic Design Principles

Basic Design Principles apply to all wireless telecommunications facilities. They require all wireless telecommunications facilities within the City to be designed and maintained so as to minimize visual, noise, and other impacts on the surrounding community. The proposed design guidelines establish three basic design principles for wireless telecommunications facilities.

1. **Impact Minimization**. The overall impacts of a wireless telecommunications facility are to be minimized in relation to aesthetic, land use, noise, traffic, and other considerations.

Although this is generally accomplished with the smallest feasible design for any given facility, a larger facility may sometimes be appropriate if it is well concealed, compatible with the surrounding neighborhood and can reduce the overall number of wireless telecommunications facilities required to provide service within the City.

2. **Integration and Concealment**. Overall, new wireless telecommunications facilities and modifications to existing facilities are to be visually integrated into their sites and as hidden from view as feasible.

   Non-integrated (unconcealed) installations are less preferred and permitted only where an integrated (concealed) facility is either infeasible or would reduce the number and overall visual intrusiveness of wireless telecommunications facilities required to provide service within the City.

3. **Context**. Specific situations require specific design solutions.

   What integrates well into one site and conceals a wireless telecommunications facility might not be appropriate for another situation. For example:

   a. Concealment behind a parapet might be a good design solution; however, designs that raise the parapet or only a portion of the parapet might not be.

   b. Placement of a wireless telecommunications facility on an existing pole or a replacement pole might or might not be visually unobtrusive, depending on the extent to which the facility adds to the height of the pole and the presence and extent of external equipment and cabling added to the pole.

   c. A wireless telecommunications facility that fits into its context (e.g., a faux tree within an area having existing trees) is generally more integrated (concealed) than one that does not (e.g., a faux tree in the middle of a non-landscaped parking lot or a faux tree of a species not otherwise present in the area).

Design Guidelines for all Wireless Telecommunications Facilities

Proposed design guidelines applying to all wireless telecommunications facilities within Los Altos expand upon the City's existing guidelines by adding provisions to require:

- Wireless telecommunications facility design to be consistent with the existing and/or proposed landscape design of the adjacent site, using a similar or complementary plant palette.
- Retain existing, mature trees wherever feasible.
- Any proposed underground vault to be designed and constructed so as to protect existing street trees.

- All landscaping proposed to screen, conceal, complement, or soften the visual intrusiveness of a wireless telecommunications facility to remain for the life of the permit, even if not located within the applicant's lease area.
- Noise from backup generators to comply with the noise levels specified in Municipal Code Chapter 6.16.
- Passive louvers and/or other passive ventilation to be provided as the primary means of temperature control rather than mechanical ventilation wherever feasible.

Design Guidelines for Wireless Telecommunications Facilities Proposed on Properties Outside Public Rights-of-Way and Utility Easements

Proposed design guidelines for wireless telecommunications facilities on properties outside of public rights-of-way and utility easements identify specific preferred and less preferred configurations for building-, and roof-, and pole-mounted facilities along with specific design guidelines and illustrative examples for the following types of installations.

- Preferred Configurations
    - **Façade-Concealed Antennas**. Façade-concealed antennas have antennas, mounting apparatus, and any associated components fully concealed from all sides within a structure that achieves complete architectural integration with the existing building (for example, antennas behind fiber-reinforced plastic [FRP] in a parapet, and equipment inside an existing building), or within outbuildings that are architecturally integrated into a site and are expected components of the setting.
    - **Faux Architectural Elements**. Faux architectural elements are existing or proposed architectural elements on a building that completely conceal antennas. They are distinguished from façade-concealed antennas in that they appear to be architectural elements of a building.
    - **Rooftop Concealment**. If accessory equipment for roof-mounted facilities cannot be installed inside the building or underground, such accessory equipment may be located on the roof of the building that the facility is mounted on, provided that both the equipment and screening materials are painted the color of the building, roof, or surroundings. Rooftop facilities that appear to be a building façade, architectural element, or parapet are considered to be façade-concealed, façade-mounted, or faux architectural facilities. Rooftop concealment is considered to be a preferred design where façade integration is not feasible.
    - **Architecturally Designed Stand-Alone Towers.** Towers that are designed to appear as buildings or signs, and that conceal antennas completely within them, may be permitted where appropriate to the site on which they are proposed. Examples include, but are not limited to, clock towers and obelisks.

- **Athletic Field Lights.** These include wireless telecommunications facilities that are integrated with lighting used to illuminate large areas for the purposes of recreation.

- **Other Permitted but Less Preferred Designs**
  - **Façade-Mounted Antennas**. Façade-mounted antennas are any antennas mounted on the exterior of a building that are not faux architectural elements.
  - **Faux Trees**. Wireless telecommunications facilities may be designed to emulate trees where trees similar in size and species are present. Faux trees may also be appropriate when natural trees of similar species are planted concurrent with faux tree installation, depending on the density and size of trees being planted.
  - **Pole-Mounted Telecommunications Facilities**. Existing guidelines for facilities mounted to a telecommunications tower on properties outside or public rights-of-way and utility easements, including, but not limited to, attached antennas, are retained in the proposed design guidelines.

Design Guidelines for Wireless Telecommunications Facilities Proposed within Public Rights-of-Way and Utility Easements

Proposed design guidelines for wireless telecommunications facilities within public rights-of-way and utility easements identify specific preferred and less preferred configurations for pole-mounted facilities along with specific design guidelines and illustrative examples for the following types of installations.

- Preferred Configuration
  - Use of light poles wherein all equipment, cabling, and antennas are within the pole itself and/or entirely under the ground.
- Other Permitted but Less Preferred Configurations
  - Use of existing or replacement utility poles.
  - Stand-alone poles along rights-of-way with no existing overhead utility poles and lines.
  - Use of light poles wherein equipment, cabling, and antennas are not completely within the pole itself and/or entirely under the ground

Requirements for Approval of Less-Preferred Configurations.

Proposed design guidelines add the requirements for applications that involve less-preferred configurations. Such applications may be approved only if the applicant demonstrates that:

- No preferred configuration would be technically feasible; or

- The proposed configuration would be aesthetically superior to a preferred configuration due to existing conditions at the proposed site.

The burden of proof for demonstrating that one of these two conditions exists shall lie with the applicant.

Proposed design guidelines require applications that involve a less-preferred configuration to be accompanied by clear and convincing written evidence demonstrating the need for approval of the proposed configuration rather than a preferred configuration. The proposed design guidelines also authorize the City to retain an independent consultant at the applicant's expense to evaluate the applicant's demonstration of need for the proposed less-preferred configuration.

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3.0 ENVIRONMENTAL FINDINGS

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factor(s) checked below would be affected by the proposed project, resulting in at least one impact that is a "Potentially Significant Impact" as indicated by the checklist and discussion on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology and Soils	☐ Greenhouse Gas Emissions	☐ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

3.2 ENVIRONMENTAL DETERMINATION

On the basis of this Initial Study which reflects the independent judgment of the City:

☒	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
☐	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have (a) been made by or agreed to by the project proponent or (b) mitigation measures will be implemented that will eliminate or reduce such significant effects to an insignificant level. A MITIGATED NEGATIVE DECLARATION will be prepared.
☐	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

_____ Date: _____

Gabriel Engeland, City Manager
City of Los Altos

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4.0 EVALUATION OF ENVIRONMENTAL IMPACTS

The CEQA Guidelines Appendix G Initial Study Checklist provides the basis for the evaluation of impacts that would result from proposed wireless telecommunications facilities standards, including locational standards, permit requirements, and design guidelines.

The analysis considers the long-term, direct, or indirect impacts of the proposed standards. To each question, there are four possible responses:

(1) ***Potentially Significant Impact***. The proposed wireless telecommunications facilities standards would generate impacts that are considered to be significant, and additional analysis in the form of an Environmental Impact Report is required to identify mitigation measures and explore alternatives that could reduce these impacts to less than significant levels.

(2) ***Less Than Significant Impact with Mitigation Incorporated***. The wireless telecommunications facilities standards would generate impacts that are considered to be significant; however, mitigation measures or changes to the project's physical or operational characteristics have been imposed that would avoid these impacts or reduce them to less than significant levels.

(3) ***Less Than Significant Impact***. The proposed wireless telecommunications facilities standards would have a physical environmental effect that would not be considered to be significant.

(4) ***No Impact***. The proposed wireless telecommunications facilities standards would not have any measurable physical effect on the environment.

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4.1 AESTHETICS

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.1 AESTHETICS — Except as provided in Public Resources Code §21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) Would the proposed project have a substantial adverse effect on a scenic vista?

No Impact. Scenic vistas are panoramic views of important visual features, as seen from public viewing areas. The Los Altos General Plan does not specifically identify any scenic vistas within or visible from the City. However, views of hillsides within the western portion of the City and beyond are available from many areas.

Wireless telecommunications facilities permitted by the proposed locational standards would be mounted on existing buildings or on poles (either existing, replacement, or new) subject to detailed design guidelines that minimize the visual intrusiveness of these facilities. Building-mounted wireless telecommunications facilities would not be permitted to add to the height of bulk of buildings and would not, therefore, have a significant adverse effect on views within the City.

Pole-mounted wireless telecommunications facilities, when mounted on an existing or replacement pole, could increase the overall height of the pole when antennas are added. In addition, although underground installation of equipment is the preferred design solution,

proposed design guidelines permit equipment to be placed in an above-ground enclosure or pole mounted when underground installation is not feasible. However, pole-mounted facilities would not have the bulk to significantly impact long-distance views within the City. While antennas and equipment for pole-mounted wireless telecommunications facilities may be visible, proposed design guidelines require installation of the least visually intrusive design. Thus, potential adverse effects on scenic vistas and views within the City would be less than significant.

b) Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. According to the California Department of Transportation California Scenic Highway Mapping System, the sole state-designated scenic highway in Santa Clara County is State Route (SR) 9 from the Santa Cruz County line to the Los Gatos city limit. Eligible State Scenic Highways (not officially designated) include SR 17 from the Santa Cruz County line to SR 9, SR 35 from Santa Cruz County line to SR 9, Interstate 280 from the San Mateo County line to SR 17, and a segment of SR 152 in southern Santa Clara County.

The proposed project proposed wireless telecommunications facilities standards could permit facilities within the viewshed of Interstate 280. New wireless telecommunications facilities within Los Altos would either be building-mounted on existing developed sites or pole-mounted within public rights-of-way. Proposed design guidelines provide for protection of existing scenic features and landscaping. Thus, impacts would be less than significant.

c) Would the proposed project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. Los Altos has a small town, semi-rural atmosphere with wooded, quiet low-density residential neighborhoods and small-scale commercial areas serving the local community and travelers on El Camino Real along the City's norther boundary. The Los Altos General Plan provides for "maintaining the low density, low profile residential character of the community through zoning regulations and design guidelines," and "ensuring compatibility between residential and non-residential development through zoning regulations and design review."

Proposed development standards and design guidelines for wireless telecommunications facilities include detailed and stringent design guidelines for installation of new or replacement wireless telecommunications facilities intended to minimize the visual

intrusiveness of such facilities within the City consistent with General Plan policy and the need for sufficient cell coverage for emergency needs and compliance with both federal and state laws.

Thus, development standards and design guidelines focus on minimizing the visibility of wireless telecommunications facilities from residences, encouraging undergrounding of utilities, and limiting the height of such facilities to be consistent with the single-family residences that predominate Los Altos' neighborhoods.

Consistent with General Plan policy, the City proposed locational standards establish a preference for the location of wireless telecommunications facilities within commercial zoning districts and the rights-of-way of Expressways, Arterials, Collectors, and Local Collectors designated on the City's General Plan Circulation Map. To avoid concentrating wireless telecommunications facilities along any one street and to provide for sufficient cell coverage, proposed locational standards also permit wireless telecommunications facilities within the rights-of-way of local residential streets in close proximity to Expressways, Arterials, Collectors, and Local Collectors. Together, proposed locational standards implement General Plan policies related to protection of visual quality and preservation of community character. No impact would therefore result.

d) Would the proposed project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

No Impact. Installation of wireless telecommunications facilities permitted by the proposed development standards and design guidelines would comply with Los Altos Municipal Code §6.16.070 (6) which limits construction activities to daytime hours as follows:

- Construction within single-family zoning districts. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work on weekdays is prohibited before 7:00 a.m. and after 5:30 p.m. and on Saturdays before 9:00 a.m. or after 3:00 p.m. or any time on Sundays or the city observed holidays of New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day and Christmas Day, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public utilities or by special exception.
- Construction within all other zoning districts. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work on weekdays is prohibited before 7:00 a.m. and after 7:00 p.m. and Saturdays before 9:00 a.m. or after 6:00 p.m. or any time on Sundays or the city observed holidays of New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans' Day, Thanksgiving Day and Christmas Day, such that the sound

therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by special exception.

Thus, installation of wireless telecommunications facilities would thus occur during daytime hours and not require nighttime lighting.

Nighttime lighting would exist on sites of building-mounted wireless telecommunications facilities sites, as well as within rights-of-way where streetlights are provided. New wireless telecommunications facilities would not, however, increase such existing nighttime illumination sources. Unless required by Federal Aviation Administration and/or Federal Communication Commission for safety reasons, no new nighttime lighting would be introduced as the result of the proposed wireless telecommunications facilities development standards and design guidelines. In addition, proposed design guidelines do not permit reflective surfaces that could cause daytime glare.

Thus, no impacts related to nighttime lighting or daytime glare would occur.

Aesthetics References

City of Los Altos. *Los Altos General Plan 2002-2020.* November 2002.

City of Los Altos. *Initial Study/Mitigated Negative Declaration Los Altos General Plan Update*. November 2002.

City of Los Altos. Municipal Code

4.2 AGRICULTURE AND FORESTRY RESOURCES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.2 AGRICULTURE AND FORESTRY RESOURCES — Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code Section 4256), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?				
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
a) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) Would the proposed project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. There are no lands within the City of Los Altos shown as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Lands within the City are identified as "Urban and Built-up Land" on the California Department of Conservation's Santa Clara County Important Farmlands Map 2016. There are no Williamson Act parcels or forest or commercial agricultural land within the City.

Because new and replacement wireless telecommunications facilities that may be permitted by the proposed development standards and design guidelines would be building-mounted on existing developed sites or pole-mounted within public rights-of-way, no agricultural lands would be converted to non-agricultural use.

b) Would the proposed project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. There are no lands within the City of Los Altos that are zoned for agricultural use or are subject to a Williamson Act contract.

c) Would the proposed project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4256), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?

No Impact. There are no lands within the City of Los Altos that are zoned for forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4256), or Timberland Production (as defined by Government Code §51104(g)).

d) Would the proposed project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. Because new and replacement wireless telecommunications facilities that may be permitted by proposed development standards and design guidelines would be building-mounted on an existing developed site or pole-mounted within a public right-of-way or utility easement, no loss of forest land or conversion of forest land to non-forest use would result.

e) Would the proposed project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Because there are no agricultural or forest lands within the City of Los Altos, proposed development standards and design guidelines would not involve any changes to the existing environment that could result in either conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

Agriculture and Forestry Resources References

California Department of Conservation, Important Farmland in California, Farmland Mapping and Monitoring Program. Accessed December 20, 2021. https://maps.conservation.ca.gov/DLRP/CIFF/

4.3 AIR QUALITY

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.3 AIR QUALITY — Would the project:				
a) Conflict with or obstruct implementation of the applicable South Coast Air Quality Management Plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) Would the proposed project conflict with or obstruct the implementation of the Bay Area Air Quality Management Plan?

Less Than Significant Impact. The City of Los Altos is within boundaries of the Bay Area Air Quality Management District (BAAQMD). BAAQMD 's most recent adopted plan is the Bay Area 2017 Clean Air Plan: Spare the Air, Cool the Climate (Clean Air Plan). The Clean Air Plan includes measures to minimize ozone precursor emissions and halt the movement of ozone and its precursors into nearby air basins and builds upon the air district's determination to minimize the emissions of fine particulate matter and toxic air contaminants.

Consistency with the Clean Air Plan is based on conformance with air quality control measures presented in the Clean Air Plan. Section 9.1 of BAAQMD's Air Quality CEQA Guidelines provides guidance for determining if a development project is consistent with the Clean Air Plan. For consistency, a project should meet three criteria: 1) support the primary goals of the Clean Air Plan; 2) include applicable Clean Air Plan control measures; and 3) not disrupt or hinder implementation of any Clean Air Plan control measures.

The primary goals of the Clean Air Plan are to attain air quality standards; to reduce population exposure to pollutants and protect public health in the Bay Area; and to reduce greenhouse gas (GHG) emissions and protect the climate. This is considered to have been accomplished if there are no project-level significant impacts, or if significant impacts are mitigated to a less-than-significant level.

As discussed below, proposed wireless telecommunications facilities development standards and design guidelines would generate minor amounts of criteria air pollutant emissions on a temporary basis during installation of a facility, which would take from as little as a few hours for minor upgrades (e.g., replacement of antennas) to a few weeks for erection of new or replacement poles for pole-mounted facilities. No operational emissions of criteria air pollutants would result from operation of these facilities, however, following installation.

There are 81 control measures in the Clean Air Plan, many of which are applicable only for industrial or regional implementation or for larger-scale development. The city would require conformance with all feasible measures that it determines are relevant to the installation of a wireless telecommunications facility as part of permit review and approval for site-specific projects. Project consistency with applicable control measures is discussed below, based in part on the implementation expectations stated in the Clean Air Plan.

As noted in Table C, below, wireless telecommunications facilities permitted by proposed development standards and design guidelines would be consistent with the Clean Air Plan. The impact is therefore less than significant.

TABLE C: POTENTIALLY APPLICABLE CLEAN AIR PLAN CONTROL MEASURES

Control Measure Number and Name	Consistency Analysis
BL4: Urban Heat Island Mitigation.	**Consistent**. This measure is intended to mitigate the "urban heat island" effect by promoting the implementation of cool roofing and cool paving techniques. Because roof-mounted wireless telecommunications facilities would have a small footprint in relation to overall building roof area, such facilities would not impair provision of cool roofing.
NW2: Urban Tree Planting.	**Consistent**. This measure encourages voluntary approaches to reduce urban heat islands by increasing shading in urban and suburban communities via planting of low-VOC emitting trees. Proposed design guidelines provide for planting of new trees and preservation of existing vegetation.
SS32 Emergency Backup Generators	**Consistent**. Reduce emissions of diesel PM and black carbon from backup generators through Draft Rule 11-18, resulting in reduced health risks to impacted individuals, and in climate protection benefits. Any backup generator proposed for a wireless telecommunications facility would be required to comply with Draft Rule 11-18 as it is written at the time of permit approval.

Control Measure Number and Name	Consistency Analysis
SS36 Particulate Matter from Trackout	**Consistent**. Prevent mud/dirt and other solid trackout from construction, landfills, quarries and other bulk material sites. Construction plans for wireless telecommunication facilities involving ground disturbance will be required to implement measures that prevent mud/dirt and other solid trackout during construction.
SS38 Fugitive Dust PM	**Consistent**. Minimize fugitive dust emissions. Construction plans for wireless telecommunication facilities involving ground disturbance will be required to implement measures that minimize fugitive dust emissions during construction.
TR7: Safe Routes to Schools and Safe Routes to Transit.	**Consistent**. This measure facilitates safe route to schools and transit by providing funds and working with transportation agencies, local governments, schools, and communities to implement safe access for pedestrians and cyclists. Wireless telecommunications facilities that would be permitted by proposed development standards and design guidelines would be located within developed properties and public rights-of-way and would typically not adversely affect safe routes to school or transit use. Where temporary closure of a sidewalk or roadway travel lane is necessary for installation of a wireless telecommunications facility, or a facility is proposed to be installed adjacent to a transit stop, preparation and implementation of a Traffic Control Plan approved by the City Engineer will be required.
TR9: Bicycle and Pedestrian Access and Facilities.	**Consistent**. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities. Where temporary closure of a roadway travel lane or bicycle facility is necessary for installation of a wireless telecommunications facility, preparation and implementation of a Traffic Control Plan approved by the City Engineer will be required.

b) Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The Bay Area Air Quality Management District is the agency with the primary responsibility for assuring that national and state ambient air quality standards are attained and maintained in the air basin. Depending on whether or not the standards are met or exceeded, the air basin is classified as being in "attainment" or "nonattainment." Table D, below, identifies the current attainment status within the air basin for each criteria pollutant.

TABLE D: SAN FRANCISCO BAY AREA AIR BASIN ATTAINMENT STATUS

Criteria Air Pollutant	State Standards	Federal Standards
Ozone	Non-attainment	Non-attainment
Respirable Particulate Matter	Non-attainment	Unclassified
Fine Particulate Matter	Non-attainment	Non-attainment
Carbon Monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified/Attainment
Lead	N/A	Attainment

Proposed wireless telecommunications facilities development standards and design guidelines do not involve the construction of any homes, businesses, or other uses that would result in population growth or long-term increase in mobile or stationary source air pollutant emissions. Installation of wireless telecommunications facilities would occur intermittently and at various different locations within the City. Such installations would typically involve installation of a new pole, replacement of an existing utility pole, addition of wireless telecommunications equipment to an existing pole, or mounting of equipment on a building or rooftop. Such installation activities would be small in scale and not involve major grading or construction activities. Thus, no net increase in long-term air pollutant emissions would result and there would be no cumulatively considerable contribution to any cumulative air quality impact during construction.

c) Would the proposed project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors include facilities or land uses populated by those who are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these receptors are residences, schools, hospitals, and daycare centers.

Construction of a wireless telecommunications facility would temporarily expose adjacent receptors to pollutant emissions, including sensitive receptors. Construction activities would be required to implement BAAQMD best management practices (BMPs) to reduce diesel particulate (PM_{10}) and $PM_{2.5}$ emissions. Due to the small scale and short time frame needed for installation of a wireless telecommunications facility, substantial pollutant concentrations would not be generated, and exposure durations would be extremely limited. Construction impacts would therefore be less than significant. No air pollutant emissions would be generated following installation of a wireless telecommunications facility.

d) Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. Offensive odors rarely cause physical harm; however, they can be unpleasant, leading to stress among members of the public and generating citizen complaints. Operation of wireless telecommunications facilities that would be permitted by the proposed development standards and design guidelines would not be a source of odors.

Construction associated with wireless telecommunications facilities would generate airborne odors, such as from diesel equipment and landscaping (fertilizing new plantings). However, the potential for emission of odors generated during facility installation would be short-term and intermittent.

Air Quality References

Bay Area Air Quality Management District (BAAQMD). *May 2017. California Environmental Quality Act Air Quality Guidelines*. Accessed December 21, 2021. http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Bay Area Air Quality Management District (BAAQMD. *2017 Clean Air Plan: Spare the Air, Cool the Climate*. Accessed December 21, 2021. https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans

4.4 BIOLOGICAL RESOURCES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.4 BIOLOGICAL RESOURCES — Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any City of Los Altos policies or ordinances protecting biological resources?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a) Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). No modification of habitat supporting any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service would result.

b) Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). No riparian habitat areas or other sensitive natural communities would be disturbed.

c) Would the proposed project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). No state or federally protected wetlands would be disturbed.

d) Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

No Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). As such, and due to the small footprint of wireless telecommunications facilities, facilities permitted by the proposed development standards and design guidelines would not impede wildlife movement compared to existing conditions.

e. Would the proposed project conflict with any City of Los Altos policies or ordinances protecting biological resources?

No Impact. Measures to protect sensitive biological resources within City of Los Altos are identified in Open Space, Conservation and Community Facilities Element and Community Design and Historic Resources Element of the Los Altos General Plan. Policy 1.1 of the Community Design and Historic Resources Element includes measures to preserve trees, especially heritage and landmark trees, and trees that protect privacy in residential neighborhoods. In addition, the City of Los Altos has adopted a Tree Protection Ordinance in Municipal Code §11.08. The Tree Protection Ordinance includes measures for removal and replacement of trees in the City, in addition to protective actions to be taken to avoid damage to existing trees. The Tree Protection Ordinance defines a "protected tree" as:

- Any tree that is 48 inches or more in circumference measured at 48 inches above grade;
- Any tree designated by the historical commission as a heritage tree or any tree under official consideration by the historical commission for heritage tree designation; and
- Any tree which was required by the city to be either saved or planted in conjunction with a development review application.

All proposed wireless telecommunications facilities will be required to comply with the provisions of Community Design and Historic Resources Element Policy 1.1 and the City's Tree Protection Ordinance (Municipal Code §11.08).

f. Would the proposed project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities), none of which are subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Biological Resources References

City of Los Altos. *Los Altos General Plan 2002-2020*. November 2002.

City of Los Altos. *Municipal Code*.

4.5 CULTURAL RESOURCES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.5 CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Discussion

a) Would the proposed project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?

Less than Significant Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Proposed design guidelines require that any roof- or building mounted facility retain the architectural character of the structure. Thus, a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5 would not occur.

b) Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?

Less Than Significant Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Thus, it is unlikely that installation of a wireless telecommunications facility would necessitate disturbance of soils below those that were previously disturbed by construction of existing roadways, utilities, and buildings. However, in the event of an unanticipated discovery during project construction, ground-disturbing activities would be halted until a City-approved qualified consulting archaeologist assesses the significance of the find

according to CEQA Guidelines §15064.5. If any find is determined to be a unique archaeological resource, the City and the consulting archaeologist would determine the appropriate measures to be taken. All archaeological resources recovered would be subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

c) Would the proposed project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Thus, it is unlikely that installation of a wireless telecommunications facility would necessitate disturbance of soils below those that were previously disturbed by construction of existing roadways and buildings.

However, in the unlikely event that human remains are encountered during construction activities, in compliance with §7050.5 of the California Health and Safety Code, construction or excavation would be stopped in the vicinity of discovered human remains until the coroner makes the determinations required by the Health and Safety Code and provides recommendations concerning the treatment and disposition of the human remains to the City in the manner provided in Public Resources Code §5097.98. Should the coroner determine the remains are those of a Native American, the following actions would be taken:

- The coroner will contact the Native American Heritage Commission (NAHC), in accordance with Health and Safety Code §7050.5 (c), and Public Resources Code §5097.98 (as amended by Assembly Bill 2641).
- The NAHC will identify the person(s) thought to be the Most Likely Descendent (MLD) of the deceased Native American, who will help determine what course of action should be taken in dealing with the remains.
- In accordance with Public Resources Code §5097.98, the specific entity responsible for the project will ensure that, according to generally accepted cultural or archaeological standards or practices, the immediate vicinity where the Native American human remains are located is not damaged or disturbed by further construction activity until the City has discussed and conferred, as prescribed in Public Resources Code §5097.98, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

Cultural Resources References

Documents

City of Los Altos. *Los Altos General Plan 2002-2020*. November 2002.

City of Los Altos. *Initial Study/Mitigated Negative Declaration Los Altos General Plan Update*. November 2002.

City of Los Altos. *Historic Resources Inventory*. October 2012.

4.6 ENERGY

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.6 ENERGY — Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) Would the proposed project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Installation of wireless telecommunications facilities associated with the proposed development standards and design guidelines would use construction equipment and techniques that are typical for utility facilities installations (pole-mounted) and building construction (building- and roof-mounted) throughout the state. Nighttime construction activities requiring lighting would be avoided unless needed to address safety or traffic movement concerns on a temporary basis. Operation of wireless telecommunications facilities would consume energy at rates typical of such facilities throughout the state.

Proposed wireless telecommunications facilities development standards and design guidelines would not, therefore, involve any wasteful, inefficient, or unnecessary consumption of energy resources.

b) Would the proposed project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. Wireless telecommunications facilities associated with the proposed development standards and design guidelines would draw power from PG&E's electrical grid, which requires production of renewable energy pursuant to the

state requirements. Thus, proposed development standards and design guidelines would not conflict with or obstruct state and local plans for energy efficiency.

4.7 GEOLOGY AND SOILS

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.7 GEOLOGY AND SOILS — Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion

a) Would the proposed project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

No Impact. The Alquist-Priolo Earthquake Fault Zoning Act requires the delineation of zones by the California Department of Conservation, Geological Survey (CGS, formerly known as the California Division of Mines and Geology [CDMG]) along sufficiently active and well-defined faults. Los Altos lies between the active San Andreas and Hayward faults, as well as numerous smaller faults. However, no active faults traverse the city and there is therefore no potential for the primary hazard of ground rupture. Thus, no impacts related to fault rupture hazards would result.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Los Altos is located within the seismically active San Francisco Bay region. The faults in this region can generate earthquakes of magnitude 7.0 or higher. During an earthquake, very strong ground shaking could occur, which could damage buildings and utility poles and threaten residents. Installations of wireless telecommunications facilities would be required to meet the most current California Building Code standards required at the time of construction to reduce the potential for substantial adverse effects related to ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similar to a fluid when subject to high-intensity ground shaking. Liquefaction occurs when three general conditions co-exist: (a) shallow groundwater, (b) low-density non-cohesive (granular) soils, and (c) high-intensity ground motion.

According to the Los Altos General Plan, the City sits on the very deep alluvial soils of the Santa Clara Valley floor. These soils, consisting of silt, clay, sand, and gravel deposits, extend to a depth of 4,000 to 5,000 feet throughout most of the city. Liquefaction hazards are not present. Although severe ground motion resulting from an earthquake would be apparent in Los Altos because of the depth of the loosely consolidated soils, "damage generally would not be serious to the predominant one- or two-story wood frame structures."

Installations of wireless telecommunications facilities would be required to meet the most current California Building Code standards required at the time of construction to

reduce the potential for substantial adverse effects related to seismic ground failure. As a result, substantial loss, injury, or death would not be anticipated.

iv. Landslides?

No Impact. Landslides could occur on hillsides where rock strata parallels surface slopes, high clay content absorbs excess water, displacement has fractured a fault zone, or the base of a slope has been removed by erosion or people. Landslides are unlikely to occur where slopes are less than 15 percent. Within Los Altos, slopes that are 15 percent or more are isolated to the southwest portions of the City. While there are no recent examples of landslides in the planning area, any installation of any pole-mounted wireless telecommunications facility within or adjacent to an area with such slopes would require preparation of a geotechnical to verify protection from landslide risks.[1]

b) Would the proposed project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Ground disturbance associated with wireless telecommunications facilities would result from excavation for construction of foundations for new or replacement poles. Erosion control measures required under Provision C.3 of the Municipal Regional Stormwater Permit would be required to be implemented to reduce potential construction-related erosion impacts. Such measures include:

Excavation and grading work would be scheduled in dry weather months or construction sites would be weatherized to withstand or avoid erosion;

Stockpiles and excavated soils would be covered with secured tarps or plastic sheeting; and

Vegetation in disturbed areas would be replanted as quickly as possible.

Implementation of the required erosion control measures would ensure that erosion and sedimentation impacts are reduced to less than significant.

c) Would the proposed project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. According to the Los Altos General Plan Initial Study, the Santa Clara Formation underlying most of the city has a low stability rating and may be

[1] The potential for landslide hazards related to buildings on which wireless telecommunications facilities might be proposed will have been addressed and mitigated if required during design and construction of such buildings.

subject to slumping and landslides on slopes greater than 15 percent. Slopes that are 15 percent or more are isolated to the southwest portions of the City. Geotechnical studies would be required and all installations of new or replacement poles would be required to comply with current building code requirements to ensure their safety. The potential for landslide hazards related to buildings on which wireless telecommunications facilities might be proposed will have been addressed and mitigated if required during design and construction of such buildings

d) Would the proposed project be located on expansive soil, creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Geotechnical studies would be required and all installations of new or replacement poles would be required to comply with the most current California Building Code standards required at the time of construction to ensure their safety.

e) Would the proposed project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Wireless telecommunications facilities associated with the proposed development standards and design guidelines would not add residents, employees, or new structures that would generate a need for wastewater disposal.

f) Would the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. Most of the city is situated on alluvial fan deposits of Holocene age that have a low potential to contain significant nonrenewable paleontological resources.

All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Thus, it is unlikely that installation of a wireless telecommunications facility would necessitate ground disturbance of soils below those that were previously disturbed by construction of existing roadways and buildings.

However, in the event of an unanticipated discovery during project construction, ground-disturbing activities would be halted until a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards determines their significance, and, if significant,

supervises their collection for curation. Any fossils collected during site-specific development project-related excavations, and determined to be significant by the qualified paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

Geology and Soils References

Documents

City of Los Altos. *Los Altos General Plan 2002-2020*. November 2002.

City of Los Altos. *Initial Study/Mitigated Negative Declaration Los Altos General Plan Update*. November 2002.

4.8 GREENHOUSE GAS EMISSIONS

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.8 GREENHOUSE GAS EMISSIONS — Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a) Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Installation of wireless telecommunications facilities would result in emissions of greenhouse gases (GHGs) from the operation of construction equipment, as well as transport of materials and construction workers to and from sites. The installation period for a wireless telecommunication facility is, however, temporary, ranging in time from a few hours for minor upgrades (e.g., replacement of antennas) to a few weeks for erection of new or replacement poles for pole-mounted facilities.

BAAQMD does not maintain thresholds of significance for construction-related GHG emissions but encourages local agencies to incorporate BMPs to reduce GHG emissions during construction as applicable. Implementation of BMPs is required as a standard condition of approval for wireless telecommunications facilities.

Operation of wireless telecommunications facilities would not add to the existing inventory of residential, business, or other uses that would generate ongoing greenhouse gas emissions within Los Altos. Once completed, a facility would require very few trips per month for maintenance and monitoring of facility operations. In addition, as discussed in Section 4.14, Population and Housing, of this Initial Study, installation and operation of wireless telecommunications facilities would not remove a barrier to growth or induce additional development. Thus, proposed wireless telecommunications facilities development standards and design guidelines would not directly or indirectly result in a

long-term increase in greenhouse gas emissions that might have a significant impact on the environment.

b) Would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. Although the City's 2013 Climate Action Plan (CAP) is now outdated, as a condition of approval for any new wireless telecommunications facility installed prior to adoption of an updated CAP, the City will require the applicant to implement applicable GHG reduction measures from the 2013 CAP. These measures may include:

- Compliance with the City's Water Efficient Landscape Ordinance (consistent with Action 3.2 A);
- Compliance with BAAQMD construction equipment best practices (consistent with Action 3.3 A); and
- Continue to manage stormwater runoff with green infrastructure such as bioswales and other Low-Impact Development strategies (consistent with Action 4.1 A).

Proposed development standards and design guidelines for wireless telecommunications facilities would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, since future wireless telecommunications facilities would not substantially increase GHG emissions based on air district screening criteria as described in subsection "a," above.

Greenhouse Gas Emissions References

Bay Area Air Quality Management District (BAAQMD). May 2017b. *California Environmental Quality Act Air Quality Guidelines*. Accessed December 23, 2021. http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Bay Area Air Quality Management District (BAAQMD). 2017a. *2017 Clean Air Plan: Spare the Air, Cool the Climate*. Accessed December 23, 2021. https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans

4.9 HAZARDS AND HAZARDOUS MATERIALS

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.9 HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) Result in a safety hazard for people residing or working in the project area due to operation of an airport with an airport land use plan or due to operation of a public or public use airport that is within 2 miles of the project site and does not have an airport land use plan?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion

a) Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Installation of wireless telecommunications facilities would include routine use of hazardous materials in the form of paints, solvents, and other

common materials containing potentially toxic substances. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Hazardous materials used during construction would ultimately be disposed of by a licensed hazardous waste transporter at an authorized and licensed disposal facility or recycling facility.

With the exception of a few facilities that might have backup generators, wireless telecommunications facilities are not associated with the use, transport, storage, or disposal of hazardous materials during ongoing operations. At the time of development of any new wireless telecommunications facility, the applicant will provide a Hazardous Materials and Emissions Questionnaire to the City if the siting of any chemicals and/or hazardous materials at the project site will occur. If materials exceed applicable thresholds outlined in the Hazardous Materials Release Response Plans and Inventory Law of 1985 (The Business Plan Act), a Hazardous Materials Business Plan would need to be obtained. The plan, when implemented, would address potential impacts associated with the accidental spill or release of chemicals and/or hazardous materials used during operations.

Radio Frequency (RF) Emissions

Radiofrequency (RF) radiation emanates from antenna on wireless telecommunications facilities and is generated by the movement of electrical charges in the antenna. The energy levels it generates are not great enough to ionize, or break down, atoms and molecules, and is thus known as "non-ionizing" radiation.

The Federal Communications Commission (FCC) is the government agency responsible for the authorization and licensing of facilities such as wireless telecommunications facilities that generate RF radiation. For guidance in health and safety issues related to RF radiation, the FCC relies on other agencies and organizations for guidance, including the EPA, FDA, the National Institute for Occupational Safety and Health (NIOSH) and OSHA, which have all been involved in monitoring and investigating issues related to RF exposure.

The FCC has developed and adopted guidelines for human exposure to RF radiation using the recommendations of the National Council on Radiation Protection and Measurements (NCRP) and the Institute of Electrical and Electronics Engineers (IEEE), with the support of the EPA, FDA, OSHA and NIOSH. According to the FCC, both the NCRP exposure criteria and the IEEE standard were developed by expert scientists and engineers after extensive reviews of the scientific literature related to RF biological effects. The exposure guidelines are based on thresholds for known adverse effects, and they incorporate appropriate safety margins.

In addition, Section 704 of the Telecommunication Act of 1996 states that "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

b) Would the proposed project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Ground disturbing activities such as would occur with installation of a new or replacement pole may expose construction workers and the public to potentially unknown hazardous substances present in the soil, which could pose health and safety risks to workers and the public. In the event of an accidental release during facility installation, construction personnel who are experienced in containing accidental releases of hazardous materials will either be able to contain and treat affected areas in the event a spill occurs or contact the appropriate agencies.

Because the amount of hazardous materials that may be required for installation of a wireless telecommunications facility would be small and al activities involving hazardous materials would comply with applicable safety regulations, the potential to create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would less than significant.

c) Would the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?

No Impact. Installation of wireless telecommunications facilities that would be permitted by development standards and design guidelines would not involve hazardous emissions or handling of hazardous or acutely hazardous materials waste within ¼-mile of an existing school.

d) Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. GeoTracker is the California Water Resources Control Board's data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater. GeoTracker contains records for

site that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal Sites.

Addresses within the City of Los Altos identified in GeoTracker are summarized in Table E. A review of the California Department of Toxic Substances Control Envirostor database identified the sites summarized in Table F.

As indicated in Tables E and F, it is possible that an application could be submitted to the City requesting installation of a wireless telecommunications facility on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. However, as also indicted in Tables E and F, the large majority of such sites have been remediated and installation of a wireless telecommunication facility would not create a significant hazard to the public or the environment. As a standard condition of approval for sites included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 that have yet to be investigated or remediated, the City would require that such investigation be completed along with any required remediation before approving a permit for installation of a wireless telecommunication facility. As a result, no significant hazards to the public or the environment would be created, and impacts would be less than significant.

TABLE E: GEOTRACKER RECORDS FOR THE CITY OF LOS ALTOS

Address	Type of Listing	Status
1540 Miramonte Ave.	Leaking underground storage tank (LUST) cleanup site	Completed – Case closed
303 First Street (within public right-of-way)		None identified.
2055 Grant Road	LUST cleanup site	Case closed
330 S. San Antonio Road	LUST cleanup site	Case closed
61 N. San Antonio Road	LUST cleanup site	Case closed
392 First Street	Cleanup Program Site	Open assessment
4350 El Camino Real	LUST cleanup site	Case closed
1287 Fremont Ave	LUST cleanup site	Case closed
470 S. San Antonio Road	LUST cleanup site	Case closed
13464 Middlefork Lane		Case closed
1570 Kensington Cir	LUST cleanup site	Case closed
27886 Via Ventana	LUST cleanup site	Case closed
1554 Miramonte Ave.	Cleanup Program Site	Open assessment
2300 Homestead Road	Cleanup Program Site	Unknown
895 N. San Antonio Road	LUST cleanup site	Case closed
67 Del Monte Ave.	LUST cleanup site	Case closed
24845 Summerhill Ave	LUST cleanup site	Case closed

Address	Type of Listing	Status
929 Fremont Ave.	LUST cleanup site	Case closed
Los Altos Fire Dept. 765 Fremont Ave.	LUST cleanup site	Case closed
26220 Moody Road	LUST cleanup site	Case closed
401 Main Street	LUST cleanup site	Case closed
Covington pipeline project South El Monte Avenue and Foothill Expressway	Cleanup program site	Open - remediation
601 Rancho Shopping Center	LUST cleanup site	Case closed
7400 St. Joseph Ave.	LUST cleanup site	Case closed
7600 St. Joseph Ave.	LUST cleanup site	Case closed
1287 Fremont Ave.	LUST cleanup site	Case closed
803 Nash Road	LUST cleanup site	Case closed
496 1st Street	LUST cleanup site	Case closed
101 Fremont Ave.	Cleanup Program Site	Open assessment & remedial action
45 Main Street	LUST cleanup site	Completed – Case closed
5084 El Camino Real	LUST cleanup site	Completed – Case closed
2073 Grant Road	LUST cleanup site	Completed – Case closed
988 N. San Antonio Road	LUST cleanup site	Completed – Case closed
4730 El Camino Real	LUST cleanup site	Completed – Case closed

Source: California Water Resources Board, GeoTracker, 2021.

TABLE F: ENVIROSTOR SITE IN THE CITY OF LOS ALTOS

Address	Site Type	Status
Los Altos High School Expansion, 201 Almond Ave.	School Cleanup	Active
Hillview maintenance yard adjacent to 97 Hillview Ave.	Evaluation	Inactive - Needs Evaluation
Hillview-Eleanor Area Plume between Eleanor Ave. and San Antonio Road	State Response	No Further Action
Los Altos Cleaners, 392 1st Street	State Response	Active

Source: California Department of Toxic Substances Control, Envirostor, 2021.

e) Would the proposed project result in a safety hazard or excessive noise for people residing or working in the project area due to operation of an airport with an airport land use plan or due to operation of a public or public use airport that is within 2 miles of the project site and does not have an airport land use plan?

No Impact. The City of Los Altos is not located within an airport land use plan. The closest airports to the City include Moffett Federal Airfield, a joint civil military airport, approximately 2.7 miles northeast of the city limits, and Palo Alto Airport, a general

aviation facility, located approximately 3.5 miles north of the city limits. All wireless telecommunications facilities approved pursuant to proposed development standards and design guidelines would be required to comply with Federal Aviation Authority safety standards. Therefore, no impacts related to safety hazard or noise impacts due to airport activities would result.

f) Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The city has an adopted Emergency Preparedness Plan identifying potential risks, facilities and resources relied upon in the event of a catastrophe, and persons responsible for implementation. Wireless telecommunications facilities would be located within existing public rights-of-way and utility easements, as well as on previously developed sites, and would not, therefore, impair implementation of or physically interfere with the city's Emergency Preparedness Plan. In the event future construction activities require work to be performed in the roadway, appropriate traffic control plans would be prepared in conjunction with an encroachment permit.

Proposed development standards and design guidelines for wireless communication facilities are intended to provide for adequate network capacity to provide reliable coverage and service to the community in a manner that minimizes the visual intrusiveness of such facilities. Availability of reliable wireless telecommunications service following an accident and during natural disasters and other emergencies is essential to first responders, community safety, local businesses, and area residents. Impacts would therefore be less than significant.

g) Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. The City of Los Altos is not located within a Very High Fire Hazard Severity Zone as delineated on California Department of Forestry and Fire Protection (CAL FIRE) State Responsibility Area and Local Responsibility Area maps. The city is largely developed and only portions of the area west of the Foothill Expressway are located near wildland areas that would be susceptible to fire. Such areas are not identified in proposed development standards and design guidelines as a permitted location for wireless telecommunications facilities.

Hazards and Hazardous Materials References

California Water Resources Control Board, GeoTracker. Accessed December 23, 2021. GeoTracker (ca.gov)

CAL FIRE Fire Hazard Severity Zone Maps. Accessed December 27, 2021.

Map of CAL FIRE's Fire Hazard Severity Zones in Local Responsibility Areas –Santa Clara County

Map of CAL FIRE's Fire Hazard Severity Zones in State Responsibility Areas – Santa Clara County

Department of Toxic Substances Control, ENVIROSTOR Database, 2007. Accessed December 23, 2021. http://www.envirostor.dtsc.ca.gov/public/

4.10 HYDROLOGY AND WATER QUALITY

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.10 HYDROLOGY AND WATER QUALITY — Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through addition of impervious surfaces, in a manner that would:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site;	☐	☐	☒	☐
iii. create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Discussion

a) Would the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

No Impact. Wireless telecommunications facilities do not require the use of water and would not create any waste discharges.

b) Would the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable management of the basin?

Less Than Significant Impact. Wireless telecommunications facilities do not require the use of water during ongoing operations. Installation activities could require minimal watering for ground disturbance required for a new or replacement pole. Such activities would have a very small footprint and limited duration and would thus not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. See subsection, "e," below for discussion of the potential to impede sustainable management of a groundwater basin.

c) Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through addition of impervious surfaces, in a manner that would:

i. Result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Minimal vegetation removal and soil disturbance would occur during installation of pole-mounted wireless telecommunication facilities. During installation-related activities, specific erosion control and surface water protection methods for each construction activity would be implemented on the project site by construction personnel. The type and number of BMP measures implemented would be based upon location-specific attributes (i.e., slope, soil type, weather conditions). These control and protection BMPs are standard in the construction industry and are commonly used to minimize soil erosion and water quality degradation. Application of BMPs administrated through the construction process would minimize the potential increase of surface runoff from erosion.

ii. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?

Less Than Significant Impact. Due to their small footprint and dispersion from each other, the minor increase in impervious surface area (generally less than 6.25 square feet) that might result from installation of a new or replacement pole for a wireless telecommunication facility would not be great enough to alter existing drainage patterns or cause off-site flooding.

iii. Create or contribute to runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. Due to their small footprint, the minor increase in impervious surface area (generally less than 6.25 square feet) that might result from installation of a new or replacement pole for a wireless telecommunication facility would not be great enough to substantially increase polluted runoff.

iv. Impede or redirect flood flows?

Less Than Significant Impact. Due to their small footprint and dispersion from each other, the minor increase in impervious surface area (generally less than 6.25 square feet) that might result from installation of a new or replacement pole for a wireless telecommunication facility would not be great enough to impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, would the proposed project risk release of pollutants due to project inundation?

No Impact. The City of Los Altos is not within a tsunami or seiche zone. Due to their small footprint, the minor increase in impervious surface area (generally less than 6.25 square feet) that might result from installation of a new or replacement pole for a wireless telecommunication facility would not be great enough to release substantial pollutants during flood conditions.

e) Would the proposed project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The Santa Clara Valley Water District (Valley Water) prepared a Groundwater Management Plan (GMP) for the Santa Clara and Llagas subbasins in 2016, describing its comprehensive groundwater management framework including objectives and strategies, programs and activities to support those objectives, and outcome measures to gauge

performance. The GMP is the guiding document for how Valley Water will ensure groundwater basins within its jurisdiction are managed sustainably.

Installation of wireless telecommunications facilities would not interfere with actions set forth by Valley Water in its GMP in regard to groundwater recharge, transport of groundwater, and/or groundwater quality. Wireless telecommunications facilities would not impede groundwater recharge due to their small footprint and would not consume potable water supplies. Therefore, no impact would result in relation to the implementation of the GMP.

Hydrology and Water Quality References

California Regional Water Quality Control Board San Francisco Bay Region, *Municipal Regional Stormwater NPDES Permit. Order No. R2-2015-0049 NPDES Permit No. CAS612008*. November 19, 2015.

Santa Clara Valley Water District. *Groundwater Management Plan*. 2016.

Santa Clara Valley Urban Runoff Pollution Prevention Program. *C3 Stormwater Handbook*. June 2016. Accessed December 27, 2021. https://cleanwater.sccgov.org/sites/g/files/exjcpb461/files/SCVURPPP_C.pdf

Santa Clara Valley Urban Runoff Pollution Prevention Program. *C3 Stormwater Handbook. Appendix E Hydromodification Management Requirements*. Accessed December 27, 2021. https://scvurppp.org/pdfs/1516/c3_handbook_2016/Appendix_E.pdf

4.11 LAND USE AND PLANNING

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.11 LAND USE AND PLANNING — Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) Would the proposed project physically divide an established community?

Less Than Significant Impact. Proposed development standards and design guidelines specifically prohibit wireless telecommunications facilities from interfering with vehicular, bicycle, and pedestrian movement. As a result, there is no potential for these development standards and design guidelines to result in dividing an established community.

b) Would the proposed project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. As indicated by the analysis contained in this Initial Study, no significant impacts would result from the proposed development standards and design guidelines for wireless telecommunications facilities.

4.12 MINERAL RESOURCES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.12 MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

a) Would the proposed project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Wireless telecommunications facilities that would be approved pursuant to proposed development standards and design guidelines would be located within existing public rights-of-way and utility easements or on existing buildings on developed sites. These development standards and design guidelines would not, therefore, directly or indirectly affect the availability of any mineral resources by restricting access to a resource recovery site or substantially depleting the reserves of any known resources in the region.

b) Would the proposed project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. See Response 4.12a.

4.13 NOISE

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.13 NOISE — Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Discussion

a) Would the proposed project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. Noise is expected to be limited to installation of facilities[2] and occasional use of cooling equipment or an emergency generator at discreet locations. Installation of wireless telecommunications facilities will be required to comply with City noise standards, which specify:

- Permitted construction hours;
- Interior and exterior noise standards by zoning district for daytime and nighttime hours; and

[2] The installation period for a wireless telecommunication facility is temporary, ranging in time from a few hours for minor upgrades (e.g., replacement of antennas) to a few weeks for erection of new or replacement poles for pole-mounted facilities.

- Prohibited acts relative to noise, including maximum noise levels at affected properties and hours during which construction is permitted. The noise ordinance allows for increases in noise related to construction activities during permitted construction hours.

Proposed development standards and design guidelines include the following noise requirements:

a. Each wireless telecommunications facility and wireless telecommunications collocation facility shall be operated in such a manner so as to minimize any disruption caused by noise.
b. At no time shall any facility be permitted to generate noise exceeding 45 dBA except for backup generators operated during periods of power outages and cooling equipment.
c. Backup generators shall only be operated during periods of power outages, and shall not be tested on weekends, on holidays, or on weekdays between the hours of 5:00 p.m. and 7:00 a.m. Noise from backup generators and cooling equipment shall not exceed the noise levels specified in Municipal Code Chapter 6.16.
d. Where feasible, passive louvers and/or other passive ventilation shall be provided as the primary means of temperature control.

Because installation and operation of wireless telecommunications equipment would be required to comply with City noise standards, impacts would be less than significant.

b) Would the proposed project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, and is generally felt rather than heard. Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second (PPV [in/sec]) and is measured in vibration decibels (VdB).

The City of Los Altos does not specify a construction vibration limit. For structural damage, the California Department of Transportation has established the vibration criteria indicated in Table G.

Installation of wireless telecommunications facilities may generate temporary groundborne vibration and groundborne noise from the operation of construction equipment. The type of equipment typically used during installations only generates localized groundborne vibration and groundborne noise that could be perceptible only in the immediate vicinity of the project site. The upper end of vibration levels typically generated by standard

construction equipment would be 0.198 inches per second (in/sec) at a distance of 26 feet and would be below the Caltrans criterion of 0.25 in/sec for the protection of fragile buildings from continuous and frequent intermittent sources. Thus, groundborne vibration impacts would be less than significant.

TABLE G: CALTRANS VIBRATION DAMAGE POTENTIAL THRESHOLD CRITERIA

	Maximum PPV (in/sec)	
Structure and Condition	Transient Source	Continuous or Frequent Intermittent Source
Extremely fragile historic buildings, ruins	0.12	0.08
Fragile buildings	0.2	.01
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern commercial buildings	2.0	0.5

Source: Caltrans, 2020.

c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the proposed project result in exposure of people residing or working in the area to excessive noise levels?*

Less Than Significant Impact. The closest airports to Los Altos include Moffett Federal Airfield, a joint civil military airport, approximately 2.7 miles northeast of the city limits, and Palo Alto Airport, a general aviation facility, located approximately 3.5 miles north of the city limits. Because proposed development standards and design guidelines for wireless telecommunications facilities would not involve any residential or commercial development that could introduce new people to the area, these standards and guidelines would not, therefore, expose any people residing or working in the area to excessive noise levels generated by airport operations.

Noise References

California Department of Transportation (Caltrans), *Transportation- and Construction-Induced Vibration Guidance Manual*, 2020. Accessed December 27, 20021.Microsoft Word - 0_CVM_April_2020_03-19-30 (ca.gov)

City of Los Altos. *Los Altos General Plan 2002-2020.* November 2002.

City of Los Altos. *Municipal Code*.

4.14 POPULATION AND HOUSING

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.14 POPULATION AND HOUSING — Would the project:				
a) Induce substantial unplanned population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) Would the proposed project induce substantial unplanned population growth in the area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not involve the construction of any homes, businesses, or other uses that would directly result in population growth, nor would such standards and guidelines remove a barrier to growth or induce additional unplanned development, for the following reasons:

- Wireless telecommunication facilities installed pursuant to proposed development standards and design guidelines would be located on existing buildings or within public rights-of-way and utility easements;
- General Plan and zoning designations and regulations governing development of residential, commercial, and other population generating uses would remain unchanged; and
- Proposed development standards and design guidelines do not involve construction of new or improved roads or water, sewer, or other infrastructure in excess of that required for the City's adopted General Plan and zoning designations.

b) Would the proposed project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. Installation of wireless telecommunication facilities on existing buildings and within public rights-of-way and utility easements would not require demolition of any buildings, nor would any businesses, people, or housing be displaced.

4.15 PUBLIC SERVICES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.15 PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

i. Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

No Impact. The City of Los Altos contracts with the Santa Clara County Fire District for fire protection and emergency medical services. There are two fire stations in Los Altos: Almond Fire Station located at 10 Almond Avenue; and Loyola Fire Station located at 765 Fremont Avenue.

Proposed development standards and design guidelines for wireless telecommunications facilities would not increase the level of needed fire protection service and would not result in the need for new or physically altered fire protection facilities because wireless communication facilities do not normally require such services.

ii. Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

No Impact. Police service is provided by the Los Altos Police Department, which is headquartered at 1 North San Antonio Road. Proposed development standards and design guidelines for wireless telecommunications facilities would not increase the level of needed police protection service and would not result in the need for new or physically altered facilities because wireless communication facilities do not normally require such services.

iii. Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in students, since no residential or business uses are proposed and no increase in population would result. Thus, no new or physically altered school facilities would be needed.

iv. Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in demand for parks since no residential uses are proposed and no increase in population would result. Thus, no new or physically altered park facilities would be needed.

v. Would the proposed project result in substantial adverse physical impacts associated with the provision of other new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in demand for other public facilities since no residential or business uses are proposed and no increase in population would result. Thus, no new or physically altered public facilities would be needed.

4.16 RECREATION

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.16 RECREATION — Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a) Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility could occur or be accelerated?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in demand for parks since no residential uses are proposed and no increase in population would result.

b) Would the proposed project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate a need for construction or expansion of park facilities since no residential uses are proposed and no increase in population would result.

4.17 TRANSPORTATION

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.17 TRANSPORTATION — Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

a) Would the proposed project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. Proposed wireless communication facilities would temporarily generate vehicle traffic at installation sites, which would last no more than a few weeks for a new or replacement pole or as little as a few hours for antenna replacement. Following installation, traffic would return to pre- installation levels with the exception of one to two site maintenance visits per month for each facility. Future additional collocations may increase traffic by one vehicle trip per month for each collocated facility at any given site. Because no new population would be generated, proposed development standards and design guidelines would not generate any increase in transit, bicycle, or pedestrian travel. The very low number of vehicle trips that would result would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including roadway, transit, bicycle, and pedestrian facilities.

Installation of wireless telecommunications facilities that would be permitted by proposed development standards and design guidelines would occur within developed properties and public rights-of-way and utility easements. Where temporary closure of a sidewalk or roadway travel lane would be necessary for installation of a wireless telecommunications facility, preparation and implementation of a Traffic Control Plan approved by the City

Engineer will be required. Should installation of a wireless telecommunications facility occur adjacent to a transit stop and require temporary relocation of the stop, the City would require the applicant for such facility to provide needed improvements for such a temporary transit stop. Thus, impacts would be less than significant.

b) Would the proposed project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Less Than Significant Impact. Pursuant to the requirements of Senate Bill 743 and CEQA Guidelines Section 15064.3(b)(1), which establish vehicle miles traveled (VMT) as the appropriate metric to analyze transportation impacts of land use projects, the City uses as the threshold of significance the citywide average VMT per capita minus 15 percent (10.39 daily VMT per resident). However, proposed development standards and design guidelines for wireless telecommunications facilities would not directly or indirectly result in population growth (see Section 4.14a, above) that would generate daily VMT. Maintenance activities would require only 1-2 trips per month for each facility. In addition, proposed development standards and design guidelines would not increase area roadway capacity and thus not indirectly increase VMT. As a result, VMT impacts would be less than significant impact.

c) Would the proposed project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Wireless telecommunications facilities approved pursuant to proposed development standards and design guidelines would be located within public rights-of-way and utility easements or on existing buildings within developed sites. Wireless telecommunications facilities would thus not alter the existing geometric design of roadways within the City. In addition, proposed design guidelines prohibit wireless telecommunications facilities from blocking the line of sight between facilities and adjacent roadways.

During any installation that would require temporary closure of a roadway travel lane, sidewalk, or bicycle facility, the City would implement a Traffic Management Plan to provide for safe vehicular, bicycle, and pedestrian movement.

Thus, the proposed development standards and design guidelines would not increase hazards due to a geometric design feature.

d) Would the proposed project result in inadequate emergency access?

Less Than Significant Impact. As discussed in Section 4.9(f), above, wireless telecommunications facilities would be located within existing public rights-of-way and utility easements, as well as on previously developed sites, and would not, therefore, impair emergency access. In the event future construction activities require work to be performed in the roadway, appropriate traffic control plans would be prepared in conjunction with an encroachment permit. Availability of reliable wireless telecommunications service following an accident and during natural disasters and other emergencies is essential to first responders, community safety, local businesses, and area residents. Impacts would therefore be less than significant.

4.18 TRIBAL CULTURAL RESOURCES

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.18 TRIBAL CULTURAL RESOURCES — Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k); or	☐	☐	☒	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Discussion

a) Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k)?

Less Than Significant Impact. As of July 1, 2015, Assembly Bill 52 (AB 52) added "tribal cultural resources" to the environmental issues required to be addressed by CEQA and established a formal consultation process between California tribes and lead agencies within the CEQA process. Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American

tribe" and are either listed in or eligible for the California Register of Historical Resources or a local historic register or are resources that the lead agency chooses to treat as tribal cultural resources. AB 52 requires that, for any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource, a lead agency must "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Requests for consultation were sent to the Tamien Nation on January 20, 2022.

All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Proposed design guidelines require that any roof- or building-mounted facility retain the architectural character of the structure. Thus, a substantial adverse change in the significance of a historical resource pursuant to Public Resources Code §21074 would not occur.

b) *Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Less Than Significant Impact. As of July 1, 2015, Assembly Bill 52 (AB 52) added "tribal cultural resources" to the environmental issues required to be addressed by CEQA and established a formal consultation process between California tribes and lead agencies within the CEQA process. Tribal cultural resources are defined as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and are either listed in or eligible for the California Register of Historical Resources or a local historic register or are resources that the lead agency chooses to treat as tribal cultural resources. AB 52 requires that, for any project that may affect or cause a substantial adverse change in the significance of a tribal cultural resource, a lead agency must "begin consultation with a California Native American tribe that is traditional and culturally affiliated with the geographic area of the proposed project." Requests for consultation were sent to the Tamien Nation on January 20, 2022.

All wireless telecommunications facilities associated with the proposed development standards and design guidelines would occur within roadway rights-of-way or within existing development sites (roof- and building mounted facilities). Thus, it is unlikely that installation of a wireless telecommunications facility would necessitate disturbance of soils below those that were previously disturbed by construction of existing roadways, utilities, and buildings. However, in the event of an unanticipated discovery during project construction, ground-disturbing activities would be halted until a City-approved qualified consulting archaeologist assesses the significance of the find according to CEQA Guidelines §15064.5. If any find is determined to be a unique archaeological resource, the City and the consulting archaeologist would determine the appropriate measures to be taken. All archaeological resources recovered would be subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

4.19 UTILITIES AND SERVICE SYSTEMS

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorpor-ated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.19 UTILITIES AND SERVICE SYSTEMS — Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes or regulations related to solid waste?	☐	☐	☐	☒

Discussion

a) Would the proposed project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in population due to increased residential or business uses and would therefore not consume water or generate

wastewater on an ongoing basis. Only minor amounts of water would be used on a temporary basis during installation of individual wireless telecommunications facilities.

As discussed in Section 4.10(c)ii, due to their small footprint and dispersion from each other, the minor increase in impervious surface area that might result from installation of a new or replacement pole for a wireless telecommunication facility would not be great enough to increase runoff and would therefore not require improved stormwater drainage facilities. While wireless telecommunications facilities require electrical power, they do not draw sufficient power so as to require new or improved energy facilities. Where wireless telecommunications facilities are proposed on existing electrical poles, addition of wireless equipment or replacement of a pole may be required. The installation of such pole-mounted facilities has been analyzed throughout this Initial Study, which has determined that no significant impacts would result.

b) Would the proposed project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in population due to increased residential or business uses and would therefore not consume water on an ongoing basis. Only minor amounts of water would be used on a temporary basis during installation of individual wireless telecommunications facilities. Thus, no new or expanded water supplies would be needed.

c) Would the proposed project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in population due to increased residential or business uses and would therefore not generate wastewater.

d) Would the proposed project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Installation of wireless telecommunications facilities would be required to meet all applicable requirements for construction waste diversion. Wireless telecommunications facilities installed pursuant to proposed development standards and

design guidelines would not generate solid waste on an ongoing basis following installation. No impacts would therefore result.

e) Would the proposed project comply with federal, state, and local management and reduction statutes or regulations related to solid waste?

No Impact. Installation of wireless telecommunications facilities would be required to comply with applicable federal, state, and local solid waste management requirements.

4.20 WILDFIRE

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.20 WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion

a) Would the proposed project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Los Altos has an adopted Emergency Preparedness Plan identifying potential risks, facilities and resources relied upon in the event of a catastrophe, and persons responsible for implementation. Wireless telecommunications facilities would be located within existing public rights-of-way and utility easements, as well as on existing buildings within previously developed sites, and would not, therefore, impair implementation of or physically interfere with the City's Emergency Preparedness Plan. In the event future construction activities require work to be performed in a roadway, appropriate traffic control plans would be prepared in conjunction with an encroachment permit.

Proposed development standards and design guidelines for wireless communication facilities are intended to provide for adequate network capacity to provide reliable wireless telecommunications coverage and service to the community in a manner that minimizes the visual intrusiveness of wireless telecommunications facilities. Availability of reliable wireless telecommunications service following an accident and during natural disasters and other emergencies is essential for first responders, community safety, local businesses, and area residents. Impacts would therefore be less than significant.

b) Due to slope, prevailing winds, and other factors, would the proposed project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The City of Los Altos is largely developed and only portions of the area west of the Foothill Expressway are located near areas that would be susceptible to wildfire. Such areas are not identified in proposed development standards and design guidelines as a permitted location for wireless telecommunications facilities with the exception of rights-of-way for Arterial and Local Collector roadways. Proposed development standards and design guidelines for wireless telecommunications facilities would not generate an increase in population due to increased residential or business uses and would therefore not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) Would the proposed project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. Wireless telecommunications facilities installed pursuant to proposed development standards and design guidelines would be located within existing public rights-of-way and utility easements or on existing buildings within developed sites. Proposed development standards and design guidelines would not, therefore, involve installation or maintenance of infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts on the environment.

d) Would the proposed project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Wireless telecommunications facilities installed pursuant to proposed development standards and design guidelines would be located within existing public

rights-of-way and utility easements or on existing buildings within developed sites. Proposed development standards and design guidelines would not, therefore, expose people or structures to significant risks related to post-wildfire conditions.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues:	*(1) Potentially Significant Impact*	*(2) Less Than Significant with Mitigation Incorporated*	*(3) Less Than Significant Impact*	*(4) No Impact*
4.21 MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As demonstrated in Section 4.4, Biological Resources, proposed wireless telecommunications facilities development standards and design guidelines would not modify sensitive habitat or adversely affect plants, fish, or wildlife species.

Further, proposed development standards and design guidelines would not have significant adverse effects on any important examples of the major periods of California history or prehistory, as described within Section 4.5, Cultural Resources; Section 4.7, Geology and Soils; and Section 4.18, Tribal Cultural Resources.

b) Does the proposed project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. An analysis was undertaken to determine the additional linear footage of roadway rights-of-way and number of parcels where wireless telecommunications facilities could be located within the City of Los Altos based on proposed development standards and design guidelines.

It was found that if locational standards were revised to permit small facilities along expressways, arterials, collectors, and local collectors regardless of the zoning of adjacent lands, small wireless telecommunications facilities could be permitted along the following additional roadway rights-of-way within the City:

- Foothill Expressway +9,360 linear feet
- Arterials
  - El Camino Real +470 linear feet
  - San Antonio Road +4,295 linear feet
  - El Monte Drive west of the Foothill Expressway +1,640 linear feet
  - Magdalena Avenue +2,610 linear feet
  - Homestead Road +1,680 linear feet
- Collectors
  - Almond Avenue +3,650 linear feet
  - Edith Avenue +1,460 linear feet
  - Main Street No Change
  - El Monte Avenue east of the Foothill Expressway +5,110 linear feet
  - Cuesta Drive +3,980 linear feet
  - Springer Road +7,460 linear feet
  - Miramonte Avenue +3,705 linear feet
  - Fremont Avenue +5,590 linear feet

- Local Collectors
  - Los Altos Avenue +6,585 linear feet
  - Covington Road +7,400 linear feet
  - Loyola Drive +2,205 linear feet
  - St. Joseph Avenue +920 linear feet
- Local Residential Streets adjacent to Expressways, Arterials, Collectors, and Local Collectors + 65,840 linear feet

Proposed development standards and design guidelines would permit wireless telecommunications facilities on 24 additional properties outside of public rights-of-way and utility easements.

Table H summarizes the linear feet of right-of-way and number of parcels within the City of Los Altos where wireless telecommunications facilities would be permitted.

TABLE H: NUMBER OF PROPERTIES AND LINEAR FEET OF ROADWAY RIGHT-OF-WAY PERMITTING WIRELESS TELECOMMUNICATIONS FACILITIES

City of Los Altos Permitted Locations for:	
Macro Wireless Telecommunications Facilities	**Small Wireless Telecommunications Facilities**
Existing Standards: 266 parcels	Existing Standards: 248 parcels
Proposed Standards: 280 parcels	Proposed Standards: 272 parcels
Existing Standards: Not permitted within rights-of-way	Existing Standards: 33,065 linear feet of right-of-way
Proposed Standards: Not permitted within rights-of-way	Proposed Standards: 167,025 linear feet of right-of-way

Source: Metis Environmental Group, 2021

Additional analysis was undertaken to determine the maximum number of new small wireless telecommunications facilities that could be permitted within the City of Los Altos, with each small facility being located a minimum of 1,000 feet from other small facilities.

Although proposed development standards and design guidelines permit small wireless telecommunications facilities within a total of 272 parcels and 167,025 linear feet of roadway right-of-way, such facilities would be required to be located a minimum of 1,000 feet from other small wireless telecommunications facilities. Thus, analysis was undertaken to determine the maximum number of new small facilities that could be permitted and installed within the City of Los Altos, all of which would be located a minimum of 1,000 feet from other small wireless telecommunications facilities in the City. By drawing 1,000-foot radii along rights-of-way permitting small wireless telecommunications facilities beginning

at the City's western boundary along El Camino Real, it was determined that a maximum of approximately 65 such facilities could be located within the City in compliance with proposed locational standards, including the requirement to maintain a 1,000-foot separation between small telecommunications facilities. A maximum of 12 new small telecommunications facilities could be permitted within the City in compliance with current locational standards, including the requirement to maintain a 1,500-foot separation between small telecommunications facilities.

Cumulative Impact Analysis

Proposed wireless telecommunications facilities development standards and design guidelines would either have no impact or a less than significant impact with respect to all environmental issues pursuant to CEQA as demonstrated in Sections 4.1 through 4.20, above. Direct and indirect physical environmental effects associated with wireless telecommunications facilities approved pursuant to proposed development standards and design guidelines would not be cumulatively considerable for the following reasons:

- The limited extent of direct and indirect physical environmental effects associated with installation of any individual wireless telecommunications facility and the dispersion of such facilities from each other when combined with the physical environmental effects of past, current, and probable future wireless telecommunications facilities projects;
- The lack of ongoing direct and indirect physical environmental effects associated with operation wireless telecommunications facilities;
- The limited extent of direct and indirect physical environmental effects associated with the total number of wireless telecommunications facilities that could be installed and operated pursuant to proposed development standards and design guidelines in relation to the extent of direct and indirect physical environmental effects associated with development of all past, current, and probable future residential, commercial, and public facilities projects.

c) Does the proposed project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. Proposed wireless telecommunications facilities development standards and design guidelines would not directly or indirectly cause substantial adverse effects on human beings. Facilities installed pursuant to these standards and guidelines would either have no impact or a less than significant impact with respect to all environmental issues pursuant to CEQA as demonstrated in Sections 4.1 through 4.20, above.

Appendix A

Los Altos Wireless Telecommunications Facilities Proposed Ordinance 2022-__

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ORDINANCE NO. ____

AN ORDINANCE OF THE LOS ALTOS CITY COUNCIL AMENDING CHAPTER 11.12 AND ADDING CHAPTER 14.82 RELATING TO WIRELESS TELECOMMUNICATIONS FACILITIES AND UTILITY INFRASTRUCTURE SETTING NEW LOCATIONAL REQUIREMENTS AND REVISING DEVELOPMENT STANDARDS

THE LOS ALTOS CITY COUNCIL HEREBY FINDS AND ORDAINS:

SECTION 1. FINDINGS

A. Pursuant to the California Constitution, Article XI, section 7; California Government Code § 37100 and other applicable law, the City Council may make and enforce within its limits all local, police, sanitary and other ordinances, resolutions and other regulations not in conflict with general laws.

B. Los Altos' public rights-of-way are a uniquely valuable public resource, closely linked with the City's rural character and natural beauty. Los Altos has a population of 30,000 and is suburban community near Silicon Valley. The City has a small town, semi-rural atmosphere – with wooded, quiet low-density single-family homes. The regulation of wireless communication facilities both within the public right-of-way and other locations within the City, is necessary to protect and preserve the aesthetics of the community. The City's General Plan also provides for the undergrounding of new telephone and utility lines, "maintaining the low density, low profile residential character of the community through zoning regulations and design guidelines," and "ensuring compatibility between residential and non-residential development through zoning regulations and design review." The City's concerns for preservation of its community including public safety, visual impact, and aesthetics relate to preserving the residential character of the community by imposing various design standards that relate to location, camouflaging, height, size and spacing of wireless telecommunications facilities. Providing separation between wireless telecommunications facilities and the front of homes along permitted rights-of-way within residential zones serves to reduce the intrusiveness of any new wireless telecommunications facilities.

C. The City is mindful of the need to minimize the potential adverse impacts on the community which includes amongst other things, limiting wireless site visibility and impacts to the City's aesthetic well-being, while balancing same against the need for sufficient cell coverage for emergency needs and complying with both federal and state laws. The regulation as to wireless site visibility is particularly focused on minimizing visibility from residences, encouraging undergrounding of utilities, and limiting the height of such facilities to be consistent with the single-family residences that predominate the housing stock of Los Altos. In keeping with these goals, the City has revised the locational standards to encourage the location of wireless telecommunications facilities within the rights-of-way of Expressways, Arterials, Collectors, and Local Collectors designated on the City's General Plan Circulation Map, while continuing to permit these facilities along local non-residential streets. And, allowing for the permitting wireless telecommunications facilities within the rights-of-way of local residential streets in close proximity to Expressways, Arterials, Collectors, and Local Collectors, as an

alternative to concentrating facilities along any one street right of way. These sound land use locational provisions will serve to ensure the preservation of the local residential areas while also being mindful of avoiding the over saturation of wireless telecommunication facilities on a single roadway.

D. If not adequately regulated, installation of small cell and other wireless telecommunications facilities within the public right-of-way can pose a threat to the public health, safety and welfare, including disturbance to the right-of-way through the installation and maintenance of wireless telecommunication facilities; traffic and pedestrian safety hazards due to the unsafe location of wireless facilities; impacts to trees where proximity conflicts may require unnecessary trimming of branches or require removal of roots due to related undergrounding of equipment or connection lines; land use conflicts and incompatibilities including excessive height of poles and/or towers; creation of visual and aesthetic blights and potential safety concerns arising from excessive size, heights, noise or lack of camouflaging of wireless telecommunications facilities including the associated pedestals, meters, equipment and power generators; and the creation of unnecessary visual and aesthetic blight by failing to utilize alternative technologies or capitalizing on collocation opportunities, all of which has the potential to yield serious negative impacts on the unique quality and character of Los Altos. The reasonably regulated and orderly development of wireless telecommunication facilities in the public-right-of-way is desirable, and unregulated or disorderly development represents a threat to the health, welfare, and safety of the Los Altos community.

E. The City's beauty is an important reason for businesses to locate in the City and for residents to live here. Beautiful views enhance property values and increase the City's tax base. The City's economy, as well as the health and well-being of all who visit, work or live in the City, depends in part on maintaining the City's beauty. The City has been moving towards the undergrounding of various utilities, including the First Street and Lincoln Park Undergrounding Utility projects, and needs to ensure that this effort is not hindered by the addition of numerous wireless telecommunications facilities cabinet, wires, cables, and bulky equipment that visually impede and clutter the City's public rights of way. The City's development and operational standards serve to encourage the reduction of all appurtenant equipment, screening of same, and efforts at undergrounding.

F. The City Council takes legislative notice of the various federal court decisions that have set applicable standards and metrics that the City must meet in the regulation of wireless telecommunications facilities. The City recognizes that there is a long–standing test in California that looks to whether and applicant has shown that there is a "significant gap" in service and an applicant has chosen the "least intrusive means of closing that gap." *MetroPCS, Inc v. City & County of San Francisco*, 400 F.3d 715,733 (9th Cir. 2005) abrogated on other grounds in *T-Mobile S., LLC v. City of Roswell, Georgia*, 574 U.S. 293 (2015). More recently, the FCC adopted an Order in a proceeding focused on small wireless facilities and 5G, which found that local regulations are preempted if those regulations "materially inhibit" the provision of wireless services. The FCC Order goes on to state that local aesthetic requirements that are reasonable in that they are technically feasible and reasonably directed to avoiding or remedying the intangible public harm of unsightly or out-of-character deployments are permissible. *In the Matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Inv.,* 33 F.C.C. Rcd. 9088 (2018), *aff'd in part, rev'd in part, City of Portland v United States,* 969 F.3d

1020, 1032 (9th Cir. 2020). That is, reasonable aesthetic requirements by definition do not "materially inhibit" service. The City is mindful of these various evolving legal decisions and FCC Orders in its provision of these revised siting and various development standards.

G. The City acknowledges that there have been significant changes in federal laws that affect local authority over wireless telecommunication facilities and other related infrastructure deployments have occurred. These changes in federal law have occurred concurrently with an ever-increasing demand for the placement of wireless telecommunication facilities within the public rights of way, in order to offer increased coverage in the way of numerous expanding technologies such as: cell phones, video streaming, and on line access to work from home during the COVID -19 pandemic. In connection with the ever increasing demand for expanding technologies, the City is also mindful of the carriers desire to move forward with 5G and the recent published decision in *Environmental Health Trust v. Federal Communications Commission*, 9 Fed. 4th 893, 905 (D.C. Cir. 2021) , wherein that Court noted that the FCC had failed to provide a reasoned explanation for its determination that exposure to RF as implicated by various technological developments that have occurred since 1996, including the ubiquity of wireless devices and Wi-Fi, and the emergence of 5G technology.

H. The City takes legislative notice of the Federal Communications Commission ("FCC") adoption on August 2, 2018, of a Third Report & Order and Declaratory Ruling in the rulemaking proceeding titled Accelerating Wireline and Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, 33 FCC Red. 7705 (rel. Aug. 3, 2018) ("the August 2018 Order"), that, among other things, contained a declaratory ruling prohibiting express and de facto moratoria for all personal wireless services, telecommunications services and their related facilities; and that the FCC adopted a Declaratory Ruling and Third Report and Order in September of 2018, --- FCC Red. ---, FCC 18-133 (rel. Sep. 27, 2018) (the "September 2018 Order"), which, among many other things, creates new shorter "shot clocks" for small wireless facilities (as defined in the September 2018 Order), alters existing "shot clock" regulations to require local public agencies to do more in less time.

I. The City recognizes its responsibilities under the Federal Telecommunications Act of 1996 and state law, and believes that it is acting consistent with the current state of the law in ensuring that irreversible development activity does not occur that would harm the public health, safety, or welfare. The City does not intend that this Ordinance prohibit or have the effect of prohibiting telecommunications service, as those terms are used in the Federal Telecommunications Act; rather, the City includes appropriate regulations to ensure that the installation, augmentation and relocation of wireless telecommunications facilities in the public rights-of-way are conducted in such a manner as to lawfully balance the legal rights of applicants under the Federal Telecommunications Act and the California Public Utilities Code while, at the same time, protect to the full extent feasible against the safety and land use concerns described herein. Indeed, the City has engaged a land use expert to map the available sites that are permissible for the siting of wireless telecommunication facilities under these siting criteria and he concludes that this current locations standards would permit small wireless

telecommunications along more than 101,185 linear feet of roadway right-of-way within Los Altos.

J. The overarching intent of this Ordinance is to make wireless telecommunications reasonably available while preserving the essential rural character of Los Altos. This will be realized by: minimizing the visual and physical effects of wireless telecommunications facilities through appropriate design, siting, screening techniques and location standards; encouraging the installation of Wireless Telecommunications Facilities at locations where other such facilities already exist; and encouraging the installation of such facilities where and in a manner such that potential adverse impacts to Los Altos is minimized.

K. The City adopted an Ordinance regulating wireless telecommunication facilities in August of 2019. This occurred after the City held a study session and several public hearings, at which stakeholders discussed wireless and other infrastructure deployment issues, potential local regulatory responses to the recent changes in federal law in the FCC orders and expressed their design and location preferences, practical and safety concerns, aesthetic concerns, policy views and the essential local values that make Los Altos a uniquely small suburban community. The City's residents in the summer of 2019 called out the numerous concerns at play with aesthetics, and these concerns included numerous objections that were focused on visual blight such as:

- Small cell nodes previously proposed by carriers, AT&T and Verizon, to the City of Los Altos were visually intrusive and unsightly;
- The City should continue to be judicious about and distaste for visual blight;
- The need to eliminate visual blight;
- The need to consider potential visual blight, to mitigate noise, heat, and exposure to EMF, and to protect our enjoyment of our property and its market value;
- These cell towers should be placed in commercial areas, in the medians of major streets, and such. They should not be placed in residential neighborhoods;
- Wireless facilities should be installed in some public/commercial place instead of residential street and so close to people's house. Los Altos neighborhood aesthetic guidelines and property value is one of the main reasons people are willing to stay in this great City.
- Cell towers or small cells are unsightly, noisy and add to the visual blight from the existing electric and telephone lines. While urging that small cells should not be placed in a small residential neighborhood cul de sac street but rather, it would be better to locate same on a major street or in the back of a commercial property;
- Cell towers are ugly and there is no need for extra eye sores;
- The mounting of "small" refrigerator-sized boxes on the side of an existing utility poles is unsightly and adds to visual blight; and
- The cell tower is an eye sore that emits an annoying fan type noise that has a negative impact on the quality of life of the residents who live there or who walk within the community.

These same concerns as to visual blight, aesthetic impairment and noise remain at play today. The visual and aesthetic impacts of the proposed wireless telecommunications facilities is much greater in a residential area versus in a non-residential area such as downtown Los Altos, or Loyola Corners, or along a main arterial or collector streets within Los Altos.

L. On _____, 2022, the City Planning Commission held a duly noticed public hearing to consider an Ordinance to add Chapter 14.82 and to amend Chapter 11.12 at which the Planning Commission received, reviewed, and considered the staff report, written and oral testimony from the public and other information in the record, and recommended to the City Council the adoption of this Ordinance regulating the placement of wireless telecommunication facilities.

M. The City recognizes its responsibilities under the Federal Telecommunications Act of 1996 and state law, and believes that it is acting consistent with the current state of the law in ensuring that irreversible development activity does not occur that would harm the public health, safety, or welfare. The City does not intend that this Ordinance prohibit or have the effect of prohibiting telecommunications service; rather, the City includes appropriate regulations to ensure that the installation, augmentation and relocation of wireless telecommunications facilities in the public rights-of-way are conducted in such a manner as to lawfully balance the legal rights of applicants under the Federal Telecommunications Act and the California Public Utilities Code while, at the same time, protect to the full extent feasible against the safety and land use concerns described herein.

N. It is not the purpose or intent of this Ordinance, nor shall it be interpreted or applied to: (1) prohibit or to have the effect of prohibiting wireless telecommunications services; or (2) unreasonably discriminate among providers of functionally equivalent wireless communications services; or (3) regulate the placement, construction or modification of Wireless Telecommunication Facilities on the basis of the environmental effects of radio frequency ("RF") emissions where it is demonstrated that the Wireless Telecommunication Facilities does or will comply with the applicable FCC regulations; or (4) prohibit or effectively prohibit any entity's ability to provide any interstate or intrastate telecommunications service, subject to any competitively neutral and nondiscriminatory rules or regulation for rights-of-way management; or (5) prohibit or effectively prohibit collocations or modifications that the City must approve under state or federal law; or (6) otherwise authorize the City to preempt any applicable federal or state law.

O. The regulations of wireless installations are necessary to protect and preserve the aesthetic character of the community and to ensure that all wireless telecommunications facilities are installed using the least intrusive means possible. The City is also mindful of the fact that there are a number of different bands that can be utilized by carriers for wireless telecommunication facilities (including 700 MHz, 800 MHz, 1900 MHz, and 2100 MHz), and that these additional available band options need to be reviewed and considered in the determination of the least intrusive alternatives. As well, there are available a number of alternative means to provide coverage within Los Altos, including but not limited to: the

upgrading of existing telecommunications facilities, the placement of macro towers, the co-location of wireless telecommunications facilities, the provision of micro towers, etc.

SECTION 2. LOCATIONAL CRITERIA

A. Chapter 14.82 of the Los Altos Municipal Code is added to provide as follows:

Chapter 14.82 Standards for the Location of Wireless Telecommunications Facilities

14.82.010 Purpose

The purpose of the following siting criteria is to provide for the location of wireless telecommunications facilities within the City of Los Altos in a manner that minimizes the visual intrusiveness of wireless telecommunications facilities and provides for coverage throughout the City.

14.82.020 Definitions

The definitions called out in Chapter 11.12 shall apply here unless a specific alternative definition is provided.

14.82.030 Wireless Telecommunications Facilities Locational Preferences

A. Wireless Telecommunications Facilities Located within Public Rights-of-Way and Utility Easements

1. Only facilities qualifying for a Section 6409(a) approval and those meeting the definition of a "small wireless facility" shall be permitted within public rights-of-way and public utility easements.

2. The preferred location for a wireless telecommunications facility within a public right-of-way or public utility easement is within the right-of-way of

one of the following roadway types as designated on the Los Altos General Plan Circulation Element as may be amended from time to time.

(a) Expressways;

(b) Arterials;

(c) Collectors fronting **non**-Residential Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010.

K. Office-Administrative District, OA (OA);

L. Office-Administrative District (OA-1 and OA-4.5);

O. Commercial Downtown District (CD);

P. Commercial Retail Sales District (CRS);

Q. Commercial Thoroughfare District (CT);

R. Commercial Retail Sales/Office District (CRS/OAD); and

V. Loyola Corners Specific Plan Overlay District (LCSPZ).

(d) Collectors fronting the Public and Community Facilities District (PCF) (Municipal Code Section 14.04.010 S).

3. Less preferred locations for wireless telecommunications facilities within public rights-of-way and public utility easements include:

(a) Rights-of-way for Local Collectors fronting non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, O-R, V); and

(b) Public utility easements adjacent to non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, O-R, V) as designated on the City of Los Altos General Plan Circulation Plan (Figure C-1).

(c) Rights-of-way for Local Streets fronting non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, O-R, V);

(d) Rights-of-way for Expressways, Arterials, Collectors, and Local Collectors fronting Residential Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010.

1. Single-Family District (R1-10);

2. Single-Family District (R1-H);

3. Single-Family District (R1-20);

4. Single-Family District (R1-40);

5. Single-Story Single-Family Overlay District (R1-S);

6. Multiple-Family District (R3-4.5);

7. Multiple-Family District (R3-5);

8. Multiple-Family District (R3-3);

9. Multiple-Family District (R3.1.8);

10. Multiple-Family District (R3-1);

11. Commercial Downtown/Multiple-Family District (CD/R3);

12. Planned Community (PC); and

13. W. Planned Unit Development (PUD).

(e) To avoid concentration of wireless telecommunications facilities within the right-of-way of any one street within the City, small wireless telecommunications facilities may also be located within the street rights-of-way for local streets fronting Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) where the facility would be:

i. Within 200 feet of the Foothill Expressway right-of-way;

ii. Within 500 feet of the San Antonio Avenue, El Monte Drive, Magdalena Avenue, or Homestead Road right-of-way;

iii. Within 300 feet of a Collector or Local Collector right-of-way.

(f) Rights-of-way for Expressways, Arterials, Collectors, and Local Collectors and public utilities easements fronting a school in the Public and Community Facilities District (Municipal Code Section 14.04.010 S)

4. Small wireless telecommunications facilities are not permitted within 1000 feet of another small wireless telecommunications facility.

5. Placement Criteria

(a) No portion of any wireless communications facility within a public right-of-way shall overhang a property line.

(b) Wireless telecommunications facilities and any associated equipment or improvements shall not physically interfere with or impede access to any:

1. Worker access to any above-ground or underground infrastructure for traffic control, streetlight or public transportation, including without limitation any curb control sign, parking meter, vehicular traffic sign or signal, pedestrian traffic sign or signal, barricade reflectors;

2. Access to any public transportation vehicles, shelters, street furniture or other improvements at any public transportation stop;

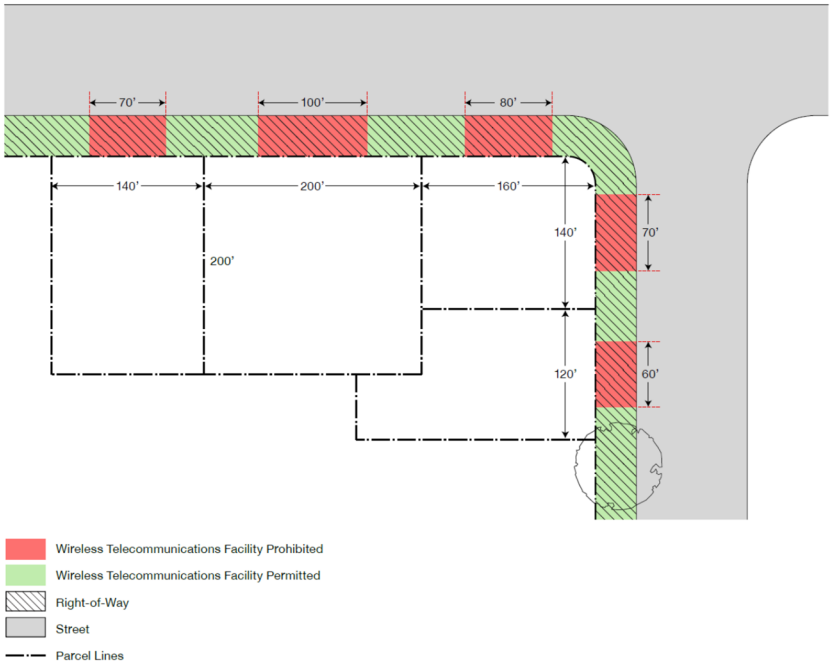
3. Worker access to above-ground or underground infrastructure owned or operated by any public or private utility agency;

4. Fire hydrant or water valve;

5. Access to any doors, gates, sidewalk doors, passage doors, stoops or other ingress and egress points to any building appurtenant to the rights-of-way; or

6. Access to any fire escape.

(c) No wireless telecommunications facility within a roadway right-of-way adjacent to Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) shall be placed within the central fifty percent (50%) of an immediately adjacent parcel's street frontage. For corner lots, this standard shall apply to both roadway frontages.



6. Wireless telecommunication facilities within roadway rights-of-way adjacent to non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, O-R, V) should be located on poles that are as close as feasible to shared property lines between two adjacent lots and not directly in front of a business.

7. Wireless telecommunication facilities should be located on poles that are as close as feasible to shared property lines between two adjacent lots and not directly in front of a business.

8. All components of a wireless telecommunications facility shall be located so as not to cause any physical or visual obstruction to pedestrian or vehicular traffic, inconvenience to the public's use of the right-of-way, or safety hazards to pedestrians and motorists.

9. Wireless telecommunications facilities shall not be located so as to interfere with access to fire hydrants, fire stations, fire escapes, water valves, underground vaults, valve housing structures, or any other vital public health and safety facility.

10. Facilities mounted to a telecommunications tower, above-ground accessory equipment, or walls, fences, landscaping or other screening methods shall be setback a minimum of 18 inches from the front of a curb.

11. Wireless telecommunication facilities shall be located on poles that are outside of driveway and intersection sight lines.

B. Wireless Telecommunications Facilities Located on Properties Outside of Public Rights-of-Way and Public Utility Easements

1. The preferred locations for wireless telecommunications facilities include properties within one of the following Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010.

   K. Office-Administrative District, OA (OA);

   L. Office-Administrative District (OA-1 and OA-4.5);

   O. Commercial Downtown District (CD);

   P. Commercial Retail Sales District (CRS);

   Q. Commercial Thoroughfare District (CT);

   R. Commercial Retail Sales/Office District (CRS/OAD); and

   V. Loyola Corners Specific Plan Overlay District (LCSPZ).

2. Less preferred locations for wireless telecommunications facilities include any City-owned property and properties within one of the following Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010.

   N. Commercial Neighborhood District (CN); and

   S. Public and Community Facilities District (PCF).

   T. Public and Community Facilities/Single-Family District (PCF/R1-10)

3. Location of Wireless Telecommunications Facilities on Properties Outside of Public Rights-of-Way and Public Utility Easements

   (a) No portion of a wireless telecommunications facility may be permitted to encroach into any applicable setback for main structures for the zoning district within which it is located unless the facility is designed per the City's Design Guidelines.

   (b) Wireless telecommunications facilities and any associated equipment or improvements shall not physically interfere with or impede access to any:

      i. Worker access to above-ground or underground infrastructure owned or operated by any public or private utility agency;

      ii. Fire hydrant or water valve;

iii. Doors, gates, sidewalk doors, passage doors, stoops or other ingress and egress points to any building; or

iv. Fire escape.

(c) No wireless telecommunications facility shall be located so as to replace or interfere with parking spaces in such a way as to reduce the total number of parking spaces below the number that is required, nor shall any facility be located so as to interfere with require access to parking spaces.

14.82.040 Requirements for Approval of Less Preferred Locations

A. Applications that involve less-preferred locations may be approved only if the applicant demonstrates that:

(1) It does not own any property or facilities within 500 feet from the proposed site that could provide service in lieu of the proposed facility;

(2) No preferred location exists within 500 feet from the proposed site; or

(3) Any preferred location within 500 feet from the proposed site would be technically infeasible.

B. The burden of proof for demonstrating compliance with these above noted conditions shall be on the applicant and must be satisfied with clear and convincing evidence.

C. Applications that involve a less-preferred location shall be accompanied by clear and convincing written evidence demonstrating the need for approval of the proposed location rather than a more preferred location.

D. In reviewing a request for a less-preferred location, the City may hire an independent consultant at the applicant's expense to evaluate the applicant's demonstration of need for the proposed less-preferred location.

14.82.050 Alternative to Wireless Telecommunications Facilities at Preferred and Less Preferred Locations

A. An application may be approved for a small wireless telecommunications facility within the right-of-way of a local residential street that is neither a preferred nor a less preferred location per the requirements of this Chapter only if:

(1) A combination of macro and small wireless telecommunications facilities, as well as colocation with existing facilities of other

carriers at preferred and less preferred locations within the City would leave a significant gap in coverage;

(2) The total number of wireless telecommunications facilities within Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) is minimized.

B. The burden of proof for demonstrating the need for one or more small wireless telecommunications facilities within the right-of-way of a local residential street that are neither a preferred nor a less preferred location per the requirements of Section 14.82.030A shall lie with the applicant and shall be included in the application submitted to the City.

C. Applications pursuant to Section 14.82.050 shall be accompanied by clear and convincing written evidence that demonstrates the applicant's existing network configuration serving the City of Los Altos cannot be expanded and/or reconfigured or modified to provide adequate service through a combination of new and relocated wireless telecommunications facilities, as well as colocation with existing facilities of other carriers at preferred and less preferred locations; and

D. In reviewing a permit request for facilities covered by Section 14.82.050, the City shall hire an independent consultant at the applicant's expense to evaluate the applicant's current network configuration and demonstration of need to verify that a combination of facilities within the preferred and less preferred locations cannot provide service throughout the City.

14.82.060 Additional Locational Preferences

A. Mid-block locations are preferred to more visible corners and intersections unless:

(1) The wireless telecommunications facility is mounted on a traffic signal control pole or streetlight;

(2) The wireless telecommunications facility is designed per the City's Design Guidelines.

B. The location of a new pole, if permitted, is preferred:

(1) Within the parkway strip if one is present.

(2) In alignment with existing trees, utility poles, and streetlights.

(3) At an equal distance between trees, when possible, with a minimum separation of 15 feet from the tree's trunk or outside of the tree's drip line, whichever is greater, such that no disturbance occurs within the critical root zone of any tree.

14.82.070 Eligible Facilities Requested per Municipal Code Section 12.12.100 and Applications Pursuant to Government Code Section 65850.6

Eligible facilities requested per Municipal Code Section 12.12.100 and applications pursuant to California Government Code Section 65850.6 (see Municipal Code Section 12.12.110), are permitted within all Zoning Districts and within all public rights-of-way subject to the locational preferences identified in Sections 1.2.1 and 1.2.2, above; and the City's Design Guidelines.

SECTION 3. WIRELESS TELECOMMUNICATIONS FACILITIES; PERMIT PROVISIONS

A. Title 11.12 of the Municipal Code for the City shall be repeal and/or amended to make the following changes to the existing text of Chapter 11.12:

1. Section 11.12.040.A is repealed and replaced as follows:

Section 11.12.040A. Permit Required. No wireless telecommunications facility shall be located or modified within the City on any property, including the public right-of-way, without the issuance of a permit as required by this Chapter. Such permit must comply with the locational standards set forth in Chapter 14.82 of the City's Municipal Code regulating zoning. In addition, such permit shall be subject to the conditions of Chapter 11.12, along with the City's Design Guidelines calling forth various design and placement standards adopted by the City Council by resolution, and shall be in addition to any other permit required pursuant to the Los Altos Municipal Code.

2. Section 11.12.050.A.9 is repealed and replaced as follows:

3. Section 11.12.050.A.9. Intentionally omitted

4. Section 11.12.050.B.1.c. is repealed and replaced as follows:

Section 11.12. 050.B.1.c. Analysis of an application that involves a less-preferred location as set forth in the locational standards of this Chapter, to determine if the applicant owns any property or facilities within 500 feet of the proposed site that could provide service in lieu of the proposed facility, and whether there is a preferred location within 500 feet and to determine whether any such preferred location is technically feasible.

5. Section 11.12.050.E.2 is repealed and replaced as follows:

Section 11.12.050.E.2 Submittal Appointment. All applications must be filed with the City at a pre-scheduled appointment. Applicants may generally submit one application per appointment, but may schedule successive appointments for multiple applications whenever feasible and not prejudicial to other applicants. Any application received without an appointment, whether delivered in person or through any other means, will not be considered duly filed until a submittal appointment is obtained.

6. Section 11.12.060 is repealed and replaced as follows:

11.12.060 - Conditions of approval for all facilities.

A. In addition to compliance with the requirements of this Chapter, upon approval all facilities shall be subject to each of the following conditions of approval, as well as any modification of these conditions or additional conditions of approval deemed necessary by the City:

1. Before the permittee submits any application for a building permit or other permits required by the Los Altos Municipal Code, the permittee must incorporate the wireless telecommunication facility permit granted under this Chapter, all conditions associated with the wireless telecommunications facility permit and the approved plans and any photo simulations (the "approved plans") into the project plans.

2. The permittee must construct, install and operate the wireless telecommunications facility in strict compliance with the approved plans. The permittee shall submit an as built drawing within ninety (90) days after installation of the facility.

3. Where feasible, as new technology becomes available, the permittee shall:

   a. Place above-ground wireless telecommunications facilities below ground, including, but not limited to, accessory equipment that has been mounted to a telecommunications tower or mounted on the ground; and

   b. Replace larger, more visually intrusive facilities with smaller, less visually intrusive facilities, after receiving all necessary permits and approvals required pursuant to the Los Altos Municipal Code.

4. The permittee shall submit and maintain current at all times basic contact and site information on a form to be supplied by the City. The permittee shall notify the city of any changes to the information submitted within seven days of any change, including change of the name or legal status of the owner or operator. This information shall include, but is not limited to, the following:

   a. Identity, including the name, address and twenty-four (24) hour local or toll free contact phone number of the permittee, the owner, the operator, and the agent or person responsible for the maintenance of the facility.

   b. The legal status of the owner of the wireless telecommunications facility, including official identification numbers and FCC certification.

c. Name, address, and telephone number of the property owner if different than the permittee.

5. The permittee shall not place any facilities that will deny access to, or otherwise interfere with, any public utility, easement, or right-of-way located on the site. The permittee shall allow the city reasonable access to, and maintenance of, all utilities and existing public improvements within or adjacent to the site, including, but not limited to, pavement, trees, public utilities, lighting and public signage.

6. To minimize environmental effects of installation and operations, wireless telecommunications facilities shall comply with the following performance standards:

   a. Where ground disturbance is required for installation of a wireless telecommunications facility, applicable best management practices (BMPs) shall be implemented to minimize loss or topsoil and site erosion and to reduce diesel particulate (PM_{10}) and $PM_{2.5}$ emissions.

   b. In the event of an unanticipated discovery of historical, archaeological, or Tribal cultural resources during construction, ground-disturbing activities shall be halted until a City-approved qualified consulting archaeologist assesses the significance of the find according to CEQA Guidelines §15064.5. If any find is determined to be a potential Tribal cultural resource or a unique archaeological resource, the City, consulting archaeologist, and the applicable Tribal authority would determine the appropriate measures to be taken. Any Tribal cultural resources identified would be subject to Tribal mitigation requirements. Any archaeological resources recovered would be subject to scientific analysis, professional museum curation, and documentation according to current professional standards.

   c. Installations of wireless telecommunications facilities shall meet the most current California Building Code standards required at the time of construction to reduce the potential for substantial adverse effects related to ground shaking.

   d. In the event of an unanticipated discovery during project construction, ground-disturbing activities would be halted until a qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards determines their significance, and, if significant, supervises their collection for curation. Any fossils collected during site-specific development project-related excavations, and determined to be significant by the qualified

paleontologist, shall be prepared to the point of identification and curated into an accredited repository with retrievable storage.

e. Noise generated by equipment will not be detrimental to the public health, safety and welfare and shall not exceed the standards set forth in chapter 6.16 of the Municipal Code and Resolution 2019-35.

f. Where temporary closure of a sidewalk or roadway travel lane would be necessary for installation of a wireless telecommunications facility, preparation and implementation of a Traffic Control Plan approved by the City Engineer shall be required. Should installation of a wireless telecommunications facility occur adjacent to a transit stop and require temporary relocation of the stop, the applicant for such facility shall provide needed improvements for such a temporary transit stop.

6. At all times, all required notices and signs shall be posted on the site as required by the FCC and California Public Utilities Commission, and as approved by the City. The location and dimensions of a sign bearing the emergency contact name and telephone number shall be posted pursuant to the approved plans.

7. At all times, the permittee shall ensure that the facility complies with the most current regulatory and operational standards including, but not limited to, radio frequency emissions standards adopted by the FCC and antenna height standards adopted by the Federal Aviation Administration. Permittee shall conduct on-site testing to ensure the facility is in compliance with all radio frequency emissions standards adopted by the FCC. Tests shall occur upon commencement of operations, and annually thereafter. Copies of the reports from such testing shall be submitted to the city within thirty (30) days of the completion of testing. The City may retain a consultant to perform testing to verify compliance with current regulatory and operational standards.

8. If the City Manager determines there is good cause to believe that the facility may emit radio frequency emissions that are likely to exceed FCC standards, the City Manager may require the permittee to submit a technically sufficient written report certified by a qualified radio frequency emissions engineer, certifying that the facility is in compliance with such FCC standards.

9. Annual Certification. Each year on July 1, the permittee shall submit an affidavit which shall list, by location, all facilities it owns within the city by location, and shall certify (1) each such installation remains in use; (2) that such in-use facility remains covered by insurance; and (3) each

such installation which is no longer in use. Any facility which is no longer in use shall be removed by permittee within sixty (60) days of delivery of the affidavit.

10. Permittee shall pay for and provide a performance bond, which shall be in effect until the facilities are fully and completely removed and the site reasonably returned to its original condition, to cover permittee's obligations under these conditions of approval and the Los Altos Municipal Code. The bond coverage shall include, but not be limited to, removal of the facility, maintenance obligations and landscaping obligations. The amount of the performance bond shall be set by the City Manager in an amount rationally related to the obligations covered by the bond and shall be specified in the conditions of approval.

11. Permittee shall defend, indemnify, protect and hold harmless the City, its elected and appointed council members, boards, commissions, officers, officials, agents, consultants, employees, and volunteers from and against any and all claims, actions, or proceeding against the city and its elected and appointed council members, boards, commissions, officers, officials, agents, consultants, employees and volunteers to attack, set aside, void or annul, an approval of the City, Planning Commission or City Council concerning this permit and the project. Such indemnification shall include damages, judgments, settlements, penalties, fines, defensive costs or expenses, including, but not limited to, interest, attorneys' fees and expert witness fees, or liability of any kind related to or arising from such claim, action, or proceeding. The City shall promptly notify the permittee of any claim, action, or proceeding. Nothing contained herein shall prohibit city from participating in a defense of any claim, action or proceeding. The City shall have the option of coordinating the defense, including, but not limited to, choosing counsel for the defense at permittee's expense.

12. All conditions of approval shall be binding as to the applicant and all successors in interest to permittee.

13. A condition setting forth the permit expiration date in accordance with Section 11.12.060 shall be included in the conditions of approval.

7. Section 11.12.080 A. is repealed and replaced as follows:

Section 11.12.080. Findings.

A. Where a wireless telecommunication facility requires a telecom use permit as provided for in this Chapter, the City shall not approve any application unless, all of the following findings are made:

1. The proposed facility complies with the locational and siting standards set forth in Chapter 14.82 and with all applicable building, electrical and fire safety codes.

2. The proposed facility complies with all applicable provisions of Chapter 14.82 and with the Design Guidelines adopted by the City.

3. The proposed facility complies with all applicable building, electrical and fire safety codes.

4. The proposed facility has been designed and located to achieve compatibility with the community to the maximum extent reasonably feasible.

5. The applicant has submitted a statement of its willingness to allow other carriers to collocate on the proposed wireless telecommunications facility wherever technically and economically feasible and where colocation would not harm community compatibility.

8. Section 11.12.090 Exceptions is repealed in its entirety.

9. Section 11.12.160.B is repealed and replaced as follows:

Section 11.12.160B. After the expiration of the wireless telecommunications permit provided for in Section A, above, a permittee shall apply for a new permit and comply with all the requirements of the City Code then at play.

10. Section 11.12.160. C and D are repealed in their entirety.

11. Section 11.12.180.A is repealed and replaced as follows:

A. Permittee's Removal Obligation. Upon the expiration date of the permit, or upon earlier termination or revocation of the permit, or abandonment of the facility after a period of ninety (90) days, the permittee, owner, or operator shall remove its wireless telecommunications facility and restore the site to its natural condition except for retaining the landscaping improvements and any other improvements at the discretion of the City. Removal shall be in accordance with proper health and safety requirements and all ordinances, rules, and regulations of the City. The facility shall be removed from the property within 30 days, at no cost or expense to the City. If the facility is located on private property, the private property owner shall also be independently responsible for the expense of timely removal and restoration. Should the City be required to remove the facility or restore a site within the public right-of-way, the owner/operator of the facility shall reimburse the City for its actual costs.

12. Section 11.02.080.C is repealed and replaced as follows:

Section 11.02.080.C A copy of any decision on an application made under this section shall be provided to the applicant, and to any party who submitted comments to the City Manager pursuant to notice required by this Chapter. Decisions shall also be posted on the Los Altos

website within twenty-four (24) hours of their issuance or as soon as reasonably practicable, in a manner clearly identifying the application to which the decision relates. And, the decision shall also be posted on the site of the proposed wireless telecommunications facility.

SECTION 4. DESIGN STANDARDS

The City Council hereby reviews the prior Design Standards called forth in Resolution No. 2019-35 adopted on August 5, 2019 and repeals same in its entirety and concurrently adopts New Design Guidelines in a separation resolution to regulate the design standards for wireless telecommunication facilities.

SECTION 5. CEQA

The Initial Study prepared for the proposed Wireless Telecommunications Facilities Development Standards and Design Guidelines indicates for each environmental issue it analyzed that environmental impacts would be less than significant or that no impact would occur. There is no substantial evidence, in light of the whole record before the lead agency (the City of Los Altos), that the project may have a significant effect on the environment.

SECTION 6. SEVERABILITY

If any section, subsection, sentence, clause, phrase, or portion of this Ordinance is for any reason held to be unconstitutional or otherwise invalid by the decision of any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. The Los Altos City Council hereby declares that it would have adopted the remainder of this ordinance, including each section, subsection, sentence, clause, phrase or portion irrespective of the invalidity of any other article, section, subsection, sentence, clause, phrase, or portion.

SECTION 7. AUTHORITY AND EFFECTIVE DATE.

This Ordinance is enacted pursuant to the authority conferred upon the Los Altos City Council by Government Code Section 36934 and will be effective thirty (30) days after second reading.

_____
Anita Enander
Mayor, City of Los Altos

_____
Attest: Andrea Chelemengos
City Clerk

ORDINANCE NO. _____ of the City of Los Altos adopted on _____, 2022 by the following roll call vote of the City Council:

Vote:

Vice Mayor Sally Meadows: _____

Councilmember Lynette Lee Eng: _____

Councilmember Neysa Fligor: _____

Councilmember Jonathan D. Weinberg: _____

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Appendix B

Los Altos Wireless Telecommunications Facilities Proposed Design Guidelines

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RESOLUTION No. 2022-__

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF LOS ALTOS ADOPTING DESIGN GUIDELINES AND STANDARDS FOR WIRELESS FACILITIES

THE CITY COUNCIL OF THE CITY OF LOS ALTOS DOES RESOLVE AS FOLLOWS:

SECTION 1. FINDINGS

A. Pursuant to the California Constitution, Article XI, section 7; California Government Code § 37100 and other applicable law, the City Council may make and enforce within its limits all local, police, sanitary and other ordinances, resolutions and other regulations not in conflict with general laws.

B. It is in the public interest for the City to establish reasonable, uniform and comprehensive design and siting guidelines for the installation of wireless facilities . The City having previously established design guidelines pursuant to Resolution No. 2019-35 adopted on August 5, 2019 (hereinafter "the Existing Design Guidelines"), now wishes to rescind the Existing Design Guidelines and replace them with new design guidelines set forth below in the **Appendix** as discussed below in Section 2 ("New Design Guidelines"), in order to protect the City of Los Altos and its aesthetics and preserve the public health and safety of the community.

C. These New Design Guidelines are intended to, and should be applied to, protect and promote public health, safety and welfare, and also balance the benefits that flow from wireless services with the City's local rules which include, without limitation, the aesthetic character of the City, its neighborhoods and community.

D. Los Altos' public rights-of-way are a uniquely valuable public resource, closely linked with the City's rural character and natural beauty. Los Altos has a population of 30,000 and is suburban community near Silicon Valley. The City has a small town, semi-rural atmosphere – with wooded, quiet low-density single-family homes. The regulation of wireless communication facilities both within the public right-of-way and other locations within the City, is necessary to protect and preserve the aesthetics of the community. The City's General Plan also provides for the undergrounding of new telephone and utility lines, "maintaining the low density, low profile residential character of the community through zoning regulations and design guidelines," and "ensuring compatibility between residential and non-residential development through zoning regulations and design review." The City's concerns for preservation of its community including public safety, visual impact, and aesthetics relate to preserving the residential character of the community by imposing these New Design Guidelines that relate to location, camouflaging, height, size and spacing of wireless telecommunications facilities. As well, the New Design Guidelines also provide separation between wireless telecommunications facilities and the front of homes along permitted rights-of-way within residential zones serves to reduce the intrusiveness of any new wireless telecommunications facilities.

E. The City is mindful of the need to minimize the potential adverse impacts on the community which includes amongst other things, limiting wireless site visibility and impacts to

the City's aesthetic well-being, while balancing same against the need for sufficient cell coverage for emergency needs and complying with both federal and state laws. These New Design Guidelines are particularly focused on minimizing visibility from residences, encouraging undergrounding of utilities, and limiting the height of such facilities to be consistent with the single-family residences that predominate the housing stock of Los Altos. In keeping with these goals, these New Design Guidelines serve to ensure the preservation of the local residential areas.

F. These New Design Guidelines serve to help minimize and/or alleviate possible threats to the public health, safety and welfare of the City of Los Altos, including but not limited to, potential disturbance to the right-of-way through the installation and maintenance of wireless telecommunication facilities; traffic and pedestrian safety hazards due to the unsafe location of wireless facilities; impacts to trees where proximity conflicts may require unnecessary trimming of branches or require removal of roots due to related undergrounding of equipment or connection lines; land use conflicts and incompatibilities including excessive height of poles and/or towers; creation of visual and aesthetic blights and potential safety concerns arising from excessive size, heights, noise or lack of camouflaging of wireless telecommunications facilities including the associated pedestals, meters, equipment and power generators; and the creation of unnecessary visual and aesthetic blight by failing to utilize alternative technologies or capitalizing on collocation opportunities, all of which has the potential to yield serious negative impacts on the unique quality and character of Los Altos.

G. The reasonably regulated and orderly development of wireless telecommunication facilities in the public-right-of-way is desirable, and unregulated or disorderly development represents a threat to the health, welfare, and safety of the Los Altos community.

H. The City's beauty is an important reason for businesses to locate in the City and for residents to live here. The City's economy, as well as the health and well-being of all who visit, work or live in the City, depends in part on maintaining the City's beauty. The City has been moving towards the undergrounding of various utilities, including the First Street and Lincoln Park Undergrounding Utility projects, and needs to ensure that this effort is not hindered by the addition of numerous wireless telecommunications facilities cabinet, wires, cables, and bulky equipment that visually impede and clutter the City's public rights of way. The New Design Guidelines serve to encourage the reduction of all appurtenant equipment, screening of same, and efforts at undergrounding.

I. The City Council takes legislative notice of the various federal court decisions and FCC Order that have recognized the City's ability to impose the New Design Guidelines to protect the aesthetics of Los Altos. In fact, the FCC Order goes on to state that local aesthetic requirements that are reasonable in that they are technically feasible and reasonably directed to avoiding or remedying the intangible public harm of unsightly or out-of-character deployments are permissible. *In the Matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Inv.,* 33 F.C.C. Rcd. 9088 (2018), *aff'd in part, rev'd in part, City of*

Portland v United States, 969 F.3d 1020, 1032 (9th Cir. 2020) and *see also Sprint PCS v. City of Palos Verdes Estates* (2009) 583 F.3d 716.

J. The City acknowledges that there has been an ever-increasing demand for the placement of wireless telecommunication facilities within the public rights of way, in order to offer increased coverage in the way of numerous expanding technologies such as: cell phones, video streaming, and on line access to work from home during the COVID -19 pandemic. In connection with the ever increasing demand for expanding technologies, the City is also mindful of the carriers desire to move forward with 5G and the potential increase in applications for wireless facilities within this small suburban community has the potential to greatly impact the quality of life and the bucolic nature of the community.

K. The overarching intent of the New Design Guidelines is to make wireless telecommunications reasonably available while preserving the essential rural character of Los Altos. The New Design Guidelines will foster such by minimizing the visual and physical effects of wireless telecommunications facilities through appropriate design, screening techniques and location standards; and encouraging the installation of such facilities where and in a manner such that potential adverse impacts to Los Altos is minimized.

L. The City adopted its Current Design Guidelines back in August of 2019. This occurred after the City held a study session and several public hearings, at which stakeholders discussed wireless and other infrastructure deployment issues, and expressed their design and location preferences, practical and safety concerns, aesthetic concerns, policy views and the essential local values that make Los Altos a uniquely small suburban community. The City's residents in the summer of 2019 called out the numerous concerns at play with aesthetics, and these concerns included numerous objections that were focused on visual blight such as:

- Small cell nodes previously proposed by carriers, AT&T and Verizon, to the City of Los Altos were visually intrusive and unsightly;
- The City should continue to be judicious about and distaste for visual blight;
- The need to eliminate visual blight;
- The need to consider potential visual blight, to mitigate noise and heat;
- Wireless facilities should be regulated in order to preserve Los Altos' neighborhood aesthetic guidelines;
- Cell towers or small cells are unsightly, noisy and add to the visual blight from the existing electric and telephone lines;
- Cell towers are ugly and there is no need for extra eye sores;
- The mounting of "small" refrigerator-sized boxes on the side of an existing utility poles is unsightly and adds to visual blight; and
- The cell tower is an eye sore that emits an annoying fan type noise that has a negative impact on the quality of life of the residents who live there or who walk within the community.

These same concerns as to visual blight, aesthetic impairment and noise remain at play today.

SECTION 2. DESIGN GUIDELINES: REPEAL OF PRIOR RESOLUTION.

The City Council previously adopted Resolution No. 2019-35 on August 5, 2019. The Council hereby repeals Resolution No. 2019-35 in its entirety.

SECTION 3. NEW DESIGN GUIDELINES.

The City Council hereby adopts the New Design Guidelines set forth in the **Appendix**, which New Design Guidelines are incorporated with this Resolution

SECTION 4. DEFINITIONS

The definitions set forth in Section 11.12.020 of the Municipal Code are incorporated by reference into this Resolution. In addition, the **Appendix** provides definitions for "Small Cell Facility" and Underground Areas."

SECTION 5. SEVERABILITY.

If any provision of this Resolution or its application to any person or circumstances is held invalid, such invalidity has no effect on the other provisions or applications of the Resolution that can be given effect without the invalid provision or application, and to this extend, the provisions of this Resolution irrespective of the invalidity of any portion thereof.

SECTION 6. EFFECTIVE DATE.

The City Clerk shall certify the adoption of this Resolution and cause it, or a summary of it to be published as required by law. This Resolution shall become effective the same date that it is adopted.

APPROVED AND ADOPTED at a Regular Meeting of the City Council of the City of Los Alto this ___ day of _____, 2022.

_____
Anita Enander
Mayor, City of Los Altos

_____
Attest: Andrea Chelemengos
City Clerk

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APPENDIX TO CITY OF LOS ALTOS RESOLUTION 2022-___

DESIGN AND DEVELOPMENT STANDARDS FOR WIRELESS TELECOMMUNICATIONS FACILITIES

I. Definitions

A. Small Cell Facility: shall have the same meaning as "small wireless facility" in 47 C.F.R. 1.60020), or any successor provision (which is a personal wireless services facility that meets the following conditions that, solely for convenience, have been set forth below):

1. The facility-
   a. is mounted on a structure 50 feet or less in height, including antennas, as defined in 47 C.F.R. Section 1.1320(d), or
   b. is mounted on a structure no more than 10 percent taller than other adjacent structures, or
   c. does not extend an existing structure on which it is located to a height of more than 50 feet by more than 10 percent, whichever is greater;
2. Each antenna associated with the deployment, excluding associated antenna equipment (as defined in the definition of antenna in 47 C.F.R. Section 1.1320(d)), is no more than three cubic feet in volume;
3. All other wireless equipment associated with the structure, including the wireless equipment associated with the antenna and any pre-existing associated equipment on the structure, is no more than 28 cubic feet in volume;
4. The facility does not require antenna structure registration under 47 C.F.R. Part 17;
5. The facility is not located on Tribal lands, as defined under 36 C.F. R. Section 800.16(x); and
6. The facility does not result in human exposure to radiofrequency radiation in excess of the applicable safety standards specified in 47 C.F.R. Section 1.1307(6).

B. Underground areas: Those areas where there are no electrical facilities or facilities of the incumbent local exchange cattier in tl1e right of way; or where the wires associated witl1 the same are or are required to be located underground; or where the same are scheduled to be converted from overhead to underground. Electrical facilities are distribution facilities owned by an electric utility and do not include transmission facilities used or intended to be used to transmit electricity at nominal voltages in excess of 35,000 volts.

II. Design And Development Standards for all Wireless Telecommunications Facilities.

A. Purpose. The purpose of this section is to provide guidelines to applicants and the City that prescribe clear, reasonable, and predictable design criteria to reduce visual and land use impacts associated with wireless telecommunication facilities in the City. Nothing in this section shall be construed to permit a wireless telecommunication facility in any location or configuration that it is otherwise prohibited by the City's locational and development standards found in Chapter 14.82.

B. Basic Design Principles. The design and development standards set forth in this section apply to all wireless telecommunications facilities no matter where they are located. Wireless telecommunications facilities shall be designed and maintained so as to minimize visual, noise, and other impacts on the surrounding community and shall be planned, designed, located, and erected in accordance with the design and development standards in this section and the following basic principles.

1. **Impact Minimization**. The overall impacts of a wireless telecommunications facility shall be minimized in relation to aesthetic, land use, noise, traffic, and other considerations. Although this is generally accomplished with the smallest feasible design for any given facility, a larger facility may sometimes be appropriate if it is well concealed, compatible with the surrounding neighborhood, and can reduce the overall number of wireless telecommunications facilities required to provide service within the City.
2. **Integration and Concealment**. Integration and concealment of a wireless telecommunications facility and its resulting visibility are a function of site context as well as the design and placement of a facility on a specific site.
    a. Overall, new wireless telecommunications facilities and modifications to existing facilities shall be visually integrated into their sites and as hidden from view as feasible.
    b. Non-integrated (unconcealed) installations are less preferred and permitted only where an integrated (concealed) facility is either infeasible or would reduce the number and overall visual intrusiveness of wireless telecommunications facilities required to provide service within the City.

Figure 1: This well-concealed wireless telecommunications facility has its antennas architecturally integrated into the building.

c. Complete concealment (e.g., no visible exterior equipment) is preferred over other methods.

d. Covering or painting antennas and equipment does not necessarily mean they are well-concealed and must be evaluated based on their actual ability to conceal the facility. Factors to be considered include the visibility of exterior pole equipment on a pole regardless of its color and concealment methods (antenna skirts, fiberglass paneling, fiber-reinforced plastic [FRP] boxes, etc.) themselves.

e. RF safety barriers shall be the least visible barrier feasible. When feasible, striping and restricted access shall be used instead of posts, chains, and/or fencing. When barriers must be visible, building materials should be integrated into the design of the facility and its adjacent surroundings.

f. Any feature that is represented on plans and photo simulations submitted to the City as providing concealment (adjacent landscaping, paint colors, architectural elements, etc.) shall be present for the life of the project, and therefore need to be within the applicant's control.

g. Future modifications to a site or facility reduce concealment that was provided with the initial installation shall not be permitted unless no feasible alternative exists, or the proposed modification involves colocation and an overall reduction of the visual intrusiveness of wireless telecommunications facilities within the City.

3. **Context**. Specific situations require specific design solutions. What integrates well into one site and conceals a wireless telecommunications facility might not be appropriate for another situation. Proposed designs shall therefore be evaluated based on the following considerations.

   a. Concealment behind a parapet might be a good design solution; however, designs that raise the parapet or only a portion of the parapet might not be.

   b. Façade-mounted antennas or a cupola might be appropriate for certain styles of architecture, but not for others.

   c. Placement of a wireless telecommunications facility on an existing pole or a replacement pole might or might not be visually unobtrusive, depending on the extent to which the facility adds to the height of the pole and the presence and extent of external equipment and cabling added to the pole.

   d. Placement of a new pole within a street right-of-way might or might not be appropriate depending on the location of any nearby utility poles, streetlights, or traffic signals.

   e. Placement of a new pole on a property outside of a right-of-way (such as on a new flagpole) might or might not be appropriate depending on its design and location in relation to buildings and other onsite features.

f. A wireless telecommunications facility that fits into its context (e.g., a faux tree within an area having existing trees) is generally more integrated (concealed) than one that does not (e.g., a faux tree in the middle of a non-landscaped parking lot or a faux tree that is poorly designed or of a species not otherwise present in the area).

g. New wireless telecommunications facilities are generally appropriate as a means of reducing the overall number of facilities within the community but might be visually intrusive depending on their height, design, and placement.

C. No Speculative Facilities. A wireless telecommunications facility, telecommunications collocation facility, or telecommunications tower that is built on speculation and for which there is no wireless tenant shall be prohibited within the City.

D. General Guidelines.

1. **Concealment**. Each facility shall be designed to be as visually inconspicuous as feasible, to prevent the facility from dominating the surrounding area, and to conceal the facility from predominant views from surrounding properties, all in a manner that achieves compatibility with the community.

   a. Cabling and equipment should be concealed wherever feasible. Where cabling and/or equipment cannot feasibly be fully concealed from public view, they should be designed and located so as to minimize their visual intrusiveness.

2. **Traffic Safety**. All facilities shall be designed and located in such a manner as to avoid adverse impacts on traffic safety.

   a. Any wireless telecommunications facility attachments placed less than 16 feet above ground level shall not be placed closer than 18 inches to a curb, nor shall they extend over a sidewalk (Caltrans Highway Design Manual Section 309).

   b. All wireless telecommunications facility equipment shall maintain at least 3 feet separation from any curb cut.

3. **Antennas**. The applicant shall use the least visible antennas possible to accomplish the coverage objectives. Antenna elements shall be flush mounted, to the extent reasonably feasible. All antenna mounts shall be designed so as not to preclude possible future collocation by the same or other operators or carriers. Antennas shall be situated to reduce visual impact without compromising their function. Whip antennas need not be screened.

4. **Landscaping**.

   a. Where appropriate, facilities shall be installed so as to maintain and enhance existing landscaping on the site, including trees, foliage, and shrubs, whether or not the landscaping is used for screening.

   b. The wireless telecommunications facility's design shall be consistent with the existing and/or proposed landscape design of the adjacent site, using a similar or complementary plant palette.

   c. Existing, mature trees shall be retained when feasible. Any existing landscaping removed or damaged by installation shall be replaced in kind.

   d. Additional landscaping shall be planted, irrigated, and maintained where such vegetation is deemed necessary by the City to provide screening or to block the line of sight between facilities and adjacent uses. Landscaping to screen wireless telecommunications facilities shall not, however, block the lines of sight and create hazards for motorists, bicyclists, and pedestrians.

   e. Any proposed underground vaults shall be designed and constructed so as to protect existing street trees, including roots within the tree's drip line.

      (1) A report from an experienced arborist shall be provided to the City upon request confirming the tree's root system has been adequately protected.

   f. Landscaping proposed to screen, conceal, complement, or soften the visual intrusiveness of a wireless telecommunications facility shall remain for the life of the permit, even if not located within the applicant's lease area. Adequate provisions shall be entered into with property owners to ensure that required landscaping is not removed, and that it is properly maintained. Landscaping outside the applicant's control is generally not considered to provide concealment, but concealment provided by such landscaping can be considered on a case-by-case basis.

5. **Signage**. Wireless telecommunications facilities and wireless telecommunications collocation facilities shall not bear any signs or advertising devices other than certification, watting, or other signage required by law or permitted by the City.

6. **Lighting**. A wireless telecommunications facility shall not be illuminated unless lighting is specifically required by the Federal Aviation Administration or other government agency, or the lighting is in association with the illumination of an athletic field on City or school property. Lighting arresters and beacon lights are not permitted unless required by the Federal Aviation Administration or other government agency. Legally required lightning arresters and beacons shall be included when calculating the height of facilities such as telecommunications towers, lattice towers, and monopoles.

7. **Noise**.

   a. Each wireless telecommunications facility and wireless telecommunications collocation facility shall be operated in such a manner so as to minimize any disruption caused by noise.

   b. At no time shall any facility be permitted to generate noise exceeding 45 dBA except for backup generators operated during periods of power outages.

   c. Backup generators shall only be operated during periods of power outages, and shall not be tested on weekends, on holidays, or on weekdays between the hours of 5:00 p.m. and 7:00 a.m. Noise from backup generators shall not exceed the noise levels specified in Municipal Code Chapter 6.16.

   d. Where feasible, passive louvers and/or other passive ventilation shall be provided as the primary means of temperature control.

8. **Security**. Each wireless telecommunications facility and wireless telecommunications collocation facility shall be designed to be resistant to, and minimize opportunities for, unauthorized access, climbing, vandalism, graffiti, and other conditions that would result in hazardous situations, visual blight, or attractive nuisances. The City may require the provision of warning signs, fencing, anti-climbing devices, or other techniques to prevent unauthorized access and vandalism when, because of its location or accessibility, a facility has the potential to become an attractive nuisance. The applicant shall cover any costs associated with the techniques described herein.

9. **Modification of Existing Equipment**. At the time of modification of a wireless telecommunications facility, existing equipment shall, to the extent feasible, be modified or replaced to reduce visual, noise, and other impacts. This shall include the reduction of the size of the ground cabinet and/or replacement with an underground vault. Examples include, but are not limited to, undergrounding the equipment or replacing larger, more visually intrusive facilities with smaller, less visually intrusive facilities.

II. Additional Design and Development Standards for Facilities Outside of the Public Right-of-Way and Public Utility Easements.

A. Basic Requirements. Facilities located outside the public right-of-way and public utility easements are subject to the design and development standards set forth in this section in addition to the design and development standards that apply to all facilities (Section 4).

B. Preferred Designs.

1. **Façade-Concealed Antennas**. Façade-concealed antennas have antennas, mounting apparatus, and any associated components fully concealed from all sides within a structure that achieves complete architectural integration with the existing building (for example, antennas behind fiber-reinforced plastic [FRP] in a parapet, and

equipment inside an existing building), or within outbuildings that are architecturally integrated into a site and are expected components of the setting. This preferred installation type has the following additional characteristics.

Figure 2: This completely concealed wireless telecommunications facility, including antennas, is cited in the City of San Diego's Land Development Manual in its guidelines for wireless communications facilities.

a. Cables and cable trays are completely hidden from view with cables routed internally or buried underground.

   (1) Exterior cable trays designed to replicate an existing vertical element may be considered on a case-by-case basis.

   (2) Standard cable trays painted and textured to match the existing building are indicative of a façade-mounted facility rather than the preferred façade-concealed facility.

b. Equipment and equipment areas shall be completely hidden.

   (1) Associated equipment shall be completely concealed inside an existing building, inside an underground vault, or by the same method as the antennas (RRUs, RRHs, surge suppressors, and similar).

   (2) Screen walls, fences, and prefabricated facilities are generally not indicative of building-concealed facilities; however, equipment enclosures designed to replicate existing buildings and structures may be considered on a case-by-case basis. This guideline shall apply to any existing or proposed mechanical equipment that serves the wireless

Figure 3: Antennas are concealed behind the circular element.

telecommunications facility, including, but not limited to, generators, air conditioning units, and similar equipment.

c. FRPs shall be both textured and painted to match adjacent building faces. Paint and texture should match completely.

d. There should be no noticeable transitions (e.g., seams or differences in paint or texture) between FRP and adjacent surfaces.

e. If concealed within a parapet, the top, sides, and rear of antennas and associated components shall also be enclosed or otherwise screened from view. No wireless telecommunications facility components, including antenna, mounting apparatus, cabling, or equipment, should be visible.

f. If a project extends the parapet upward, the extensions should have symmetry in all visible dimensions. Antennas and concealment elements shall not dominate the element on which they are placed.

2. **Faux Architectural Elements**. Faux architectural elements are existing or proposed architectural elements on a building that completely conceal antennas. They are distinguished from façade-concealed antennas in that they appear to be architectural elements of a building.

a. This preferred installation type may take a variety of forms, such as tower elements and cupolas. Architectural integration may also include tapered columns (which may hide façade-mounted antennas individually), wing walls, dormers, statues, façade-mounted signage, and other elements.

b. This preferred installation type shall be appropriate to the architectural context and have the following additional characteristics:

Figure 4: A cupola (above) and a clock tower (below) conceal antennas.

(1) Design that matches the style of the building and is designed as a feature commonly found on the type or style of building upon which the element is proposed; and

(2) Colors and textures that match the existing building, including finishing features such as reveals, windows, tapers, cornices, tiling, roofing materials, and trim.

c. Antennas and related equipment shall not encroach from a building into the public right-of way or onto an adjacent property.

3. Rooftop Concealment. If accessory equipment for roof-mounted facilities cannot be installed inside the building or underground, such accessory equipment may be located on the roof of the building that the facility is mounted on , provided that both the equipment and screening materials are painted the color of the building, roof, or surroundings. Rooftop facilities that appear to be a building façade, architectural element, or parapet are considered to be façade-concealed, façade-mounted, or faux architectural facilities. Rooftop concealment is considered to be a preferred design where façade integration is not feasible.

a. Roof-mounted facilities shall be designed and constructed to be fully concealed or screened in a manner compatible in color, texture, and type of material with the existing architecture of the building on which the facility is mounted. Screening shall not increase the bulk of the structure nor alter the character of the structure.

(1) All screening materials for roof-mounted facilities shall be of a quality and design that is architecturally integrated with the design of the building or structure.

(2) Rooftop concealment shall be appropriate to the architectural setting, matching the colors and textures of existing building (including features such as reveals, cornices, tiling, roofing materials, and trim), and shall be designed as a feature commonly found on the type or style of building upon which the facility is proposed.

(3) Integration into existing rooftop elements is preferred over creating new rooftop elements unless integration would be architecturally undesirable.

(4) The height of rooftop screening shall not exceed the maximum height permitted by the zoning district within which the facility is located.

(5) Roof-mounted wireless telecommunications facilities shall not be visible from any side and may need to be concealed from the top if adjacent structures are taller and have views onto the roof where wireless telecommunications facilities are proposed to be mounted.

(6) Equipment located on the roof of an existing structure shall be set back or located to minimize visibility, especially from the public right of-way or

viewing locations accessible to the public. Rooftop screening elements will generally need to be set back from the roof edge at least as far as they are tall.

(7) Rooftop screening shall not dominate a façade. For example, an antenna screen that approaches the height of a building story and runs most of the length of a façade containing windows would substantially increase building height but not appear as part of the structure. In this case, it would be more desirable to extend the parapet and make the building itself appear taller.

b. Unconcealed rooftop installations such as lattice towers, monopoles, and rack mounts that are visible from the public right-of-way or viewing locations accessible to the public shall not be permitted.

4. **Architecturally Designed Stand-Alone Towers.** Towers that are designed to appear as buildings or signs, and that conceal antennas completely within them, may be permitted where appropriate to the site on which they are proposed. Examples include, but are not limited to, clock towers and obelisks.

   a. Architecturally designed stand-alone towers shall be of high-quality design and provide variation in planes, textures, colors, or treatments to avoid the look of a simple box.

   b. Clock towers shall have a functioning clock at all times.

   c. A separate sign permit may be required for any onsite sign used to conceal antennas.

   d. A wireless telecommunications facility permit may not be used to request signage that does not comply with Municipal Code standards for signage.

5. **Athletic Field Lights.** The guidelines in this section are for lights used to illuminate large areas for the purposes of recreation. For lights used to illuminate the immediate area for pedestrian or driver safety, see Section C.4, Parking Lot Light Standards, below.

   a. Antennas shall be mounted as close as possible to the pole and within an antenna shroud that conceals the antennas and any associated components. No wireless telecommunications facility component except the antenna shroud shall be visibly mounted to a pole.

   b. Antennas and mounting components shall be painted the same color as the pole.

   c. All cables and conduit to and from the light standard shall be routed from the caisson up into the pole. Cable coverings may be permitted in limited circumstances where they would be minimally visible.

   d. When a wireless telecommunications facility is proposed on a field with no existing lighting or no functional lighting, the applicant shall provide additional lighting as required to provide a functionally illuminated sports field. Partial lighting of a sports field is not acceptable.

C. Other Permitted Designs.

1. **Façade-Mounted Antennas**. Façade-mounted antennas are any antennas mounted on the exterior of a building that are not faux architectural elements. Façade- mounted antennas shall:

   a. Employ a symmetrical, balanced design.

      (1) No interruption of architectural lines or horizontal or vertical reveals should occur.

      (2) Antennas should be no longer or wider than the façade on which they are proposed and shall not encroach into window areas or protrude above or below the surface on which they are mounted.

      (3) Antennas should be mounted with their tops at the roofline unless there is an obstacle, or unless to do so would decrease concealment.

   b. Use the smallest mounting brackets available to provide the smallest offset from the building.

   c. Limit the distance from the front of the antenna (or antenna shroud/FRP) to the face of the building to 12 inches. Panel antennas may be mounted up to 18 inches away from a building façade when the applicant provides evidence demonstrating that the wireless communication facility cannot operate without incorporating a tilt greater than 12 inches.

   d. Fit each antenna into the design of an existing façade, with each antenna being no longer or wider than the portion of the façade upon which it is mounted. The antennas should not interrupt the architectural lines of the façade.

   e. Conceal associated mounting brackets and cable from view. Any pipes or similar apparatus used to attach panel antennas to a building façade shall not extend beyond the length or width of the panel antenna. Measurements may be verified during inspection.

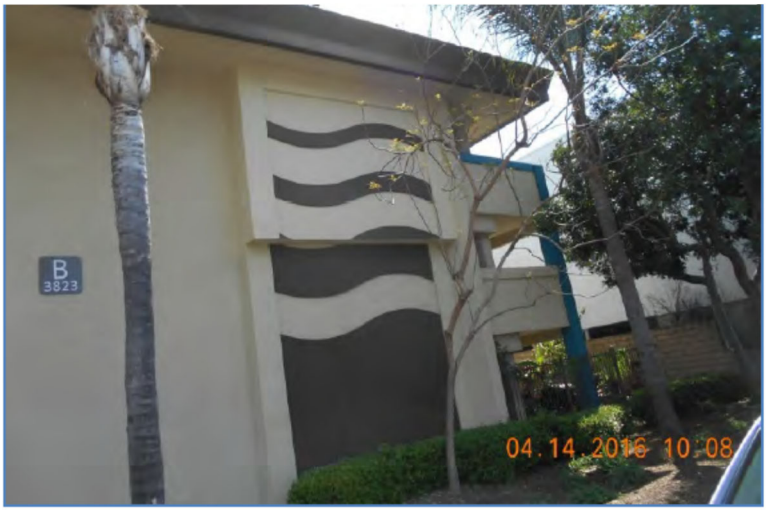

Figure 5: Although façade-mounted boxes are not preferred, this example from San Diego achieves integration with the structure.

f. If a façade-mounted facility dominates a façade element, use façade-mounted FRP boxes that look like an extension of the façade.

g. If not covered by an FRP box, use skirts and chin covers to conceal mounting hardware, create a cleaner appearance, and minimize visual impact. Chin covers shall be designed to replicate the antenna profile. Transitions between antennas and screening devices should not be visible (no gaps). Antennas should appear to be the same length, width, and depth, spaced uniformly.

h. Match the color and texture of concealment measures to adjacent building surfaces, including includes trim, reveals, lines, and similar features. No visible transition lines or gaps should occur.

i. Avoid exposed cabling.

j. If not covered by an FRP box, provide a unified appearance. If antennas differ in shape or size, they should all be given unified dimensions using skirts and chin straps spaced uniformly across a façade.

k. Locate ventilation openings on the top or bottom of screening elements only.

l. Not encroach from a building into the public right-of way or onto an adjacent property.

2. Faux Trees. Wireless telecommunications facilities may be designed to emulate trees where trees similar in size and species are present. Faux trees may also be appropriate when natural trees of similar species are planted concurrent with faux tree installation, depending on the density and size of trees being planted.

a. Faux trees shall be of a type and size to adequately conceal antennas within them while appearing natural.

(1) Faux trees shall replicate the shape, structure, and color of live trees, and be designed to look like the tree species they intend to replicate (e.g., a faux pine tree shall be shaped like a pine tree). Branching shall not make the tree look top-heavy or unnatural.

Figure 6: In this example, antennas are concealed by the faux "mono-pine."

(2) If no trees exist within the immediate area, the applicant shall create a landscape setting that integrates the faux tree with added species of a similar height and type.

(3) All branches at the antenna level shall extend a minimum of 24 inches beyond the entire vertical length of the antennas for maximum concealment. Antenna socks shall not count toward this requirement.

(4) Faux trees shall be designed with a minimum of four branches per foot for full density coverage with limited spacing between the branches unless three dimensional (3D) models justify lower branch counts.

(5) There shall be no gaps in branch coverage. All branch ports shall be used for branches. Branches shall blend down the tree with no abrupt transitions.

(6) Poles should be five feet shorter than the overall height of the faux tree to allow branching at the top of the tree.

(7) Due to the physical form of palm trees and the difficulty of providing concealment for wireless telecommunications facilities, faux palms shall not be permitted.

b. Applications proposing faux tree installations shall provide detailed specifications during plan review, including:

(1) 3D-modeled photo simulations illustrating branches, foliage, pole, and equipment; and

(2) Sufficient samples, models, or other means to demonstrate the quality, appearance, and durability of the faux tree.

c. Projects shall not be approved at final inspection if they do not match the approved exhibits, including photo simulations.

3. Flagpoles and Similar Vertical Elements. This section addresses the design of wireless telecommunications facilities designed as flagpoles or other stand-alone pole-like elements that are not used for illumination or above-ground utilities.

a. Flagpoles shall replicate the design, diameter, and proportion of the vertical element they are intended to imitate and shall maintain a tapered design.

b. Generally, flagpoles should be 30 feet or less in height and not exceed 9 inches in diameter.

(1) Flagpoles that are higher than 30 feet and/or exceed 9 inches in diameter may be permitted where the flagpole is located in a suitable setting and appropriately tapered to maintain the appearance of an authentic flagpole.

b. Antennas and any pole-mounted equipment shall be enclosed within the flagpole. Flagpoles shall not have an antenna shroud.

c. Flagpoles shall comply with the U.S. Flag Code at all times.

d. All cables shall be routed directly from the ground up through the pole.

4. **Parking Lot Light Standards**. These guidelines are for lights used to illuminate the immediate area for vehicular and pedestrian safety within a parking lot.

   a. Light standards used for wireless telecommunications facilities shall:

      (1) Replicate the design, diameter, and proportion of the vertical element they are intending to imitate; and

      (2) Replicate as closely as possible the design of any other lighting standard within the parking lot, including but not limited to the height of other parking lot lighting standards and the design, material, and color of nearby light poles.

   b. All cables and conduit to and from the light standard shall be routed from the caisson through the pole to the antennas.

   c. All antennas shall be concealed inside an antenna shroud of a shall be compatible with the diameter of the pole or concealed within the pole.

   d. Light fixtures shall be sized and balanced with the design and height of the overall light pole.

D. Pole-Mounted Telecommunications Facilities.

1. Facilities mounted to a telecommunications tower, including, but not limited to, the attached antennas, shall be designed to be the minimum functional height and width required to adequately support the proposed facility and meet Federal Communications Commission (FCC) requirements. The applicant shall provide documentation satisfactory to the City Manager establishing compliance with this paragraph.

2. Monopole installations shall be situated so as to utilize existing natural or man-made features including topography, vegetation, buildings, or other structures to provide the greatest amount of visual screening.

3. All antenna components and accessory wireless equipment shall be treated with exterior coatings of a color and texture to match the predominant visual background or existing architectural elements so as to visually blend in with the surrounding development. Subdued colors and non-reflective materials that blend with surrounding materials and colors shall be used.

4. Monopoles shall be no greater in diameter or other cross-sectional dimensions than is necessary for the proper functioning of the facility.

E. Accessory Equipment.

1. All accessory equipment associated with the operation of any wireless telecommunications facility shall be fully screened or camouflaged, and located in a manner to minimize its visibility to the greatest extent feasible.
2. Accessory equipment for facilities mounted to a telecommunications tower shall be visually screened by locating the equipment either within a nearby building, in an underground vault (with the exception of required electrical panels) or in another type of enclosed structure, which shall comply with the development and design standards of the zoning district in which the accessory equipment is located. Such enclosed structure shall be architecturally treated and adequately screened from view by landscape plantings, decorative walls, fencing or other appropriate means, selected so that the resulting screening will be visually integrated with the architecture and landscaping of the surroundings.

F. Signage.

1. All wireless facilities must include signage that accurately identifies the equipment owner/operator, the site name or identification number, and a toll-free number to the owner/operator's network operations center.
2. Wireless facilities may not bear any other signage or advertisements unless expressly approved by the City, required by law or recommended under existing and future FCC or other United States governmental agencies for compliance with RF emissions regulations.
3. RF notification signs shall be placed where appropriate, and not at pedestrian eye level, unless required by the FCC or other regulatory agencies.

III. Additional Design and Development Standards for Facilities in the Public Right-of-Way and in Public Utility Easements.

A. Basic Requirements. Facilities located in the public right-of-way and in public utility easements are subject to the design and development standards set forth in this section in addition to the design and development standards that apply to all facilities. Only pole-mounted antennas shall be permitted in the right-of-way. All other telecommunications towers are prohibited.

B. Preferred Configurations

1. Light Poles Wherein all Equipment, Cabling, and Antennas are Within the Pole Itself and/or Entirely Under the Ground.

a. Use of light poles for wireless telecommunications facilities may be permitted where there are existing light poles or in areas where a new light pole would be appropriate (e.g., intersections).

b. The maximum height of any antenna mounted to a street light pole shall not exceed seven feet above the existing height of a street light pole in a location where the closest adjacent district is a commercial zoning district and shall not exceed three feet above the existing height of a street light pole in any other zoning district. Any portion of the antenna or equipment mounted on such a pole shall be no less than 18 feet above any drivable road surface.

c. Antenna shrouds shall be the same diameter as the pole. The bottom 66 inches of a pole (the "base") may be up to 6 inches in diameter wider to accommodate equipment.

d. To prevent accumulation of trash, facilities shall be designed to avoid flat surfaces in the transition from the base to the upper pole.

e. Poles shall be painted and textured to City standards to match existing streetlights in the vicinity.

C. Less Preferred Configurations.

1. Existing or Replacement Utility Poles.

a. The maximum height of any antenna mounted to an existing utility pole shall not exceed 24 inches above the height of an existing utility pole, nor shall any portion of the antenna or equipment mounted on a pole be less than 18 feet above any drivable road surface. All installations on utility poles shall fully comply with the California Public Utilities Commission (CPUC) general orders (GOs), including, but not limited to, GO 95.1.

Figure7: Landscaping conceals wireless telecommunications equipment mounted on the exterior of this pole located on Distel Drive.

b. All antennas shall be shrouded. Antenna shrouds should have an outer diameter of 15" or less and measure no more than five cubic feet in size. The shroud should be no more than 4 feet tall, including antenna, radio head, mounting bracket, and all other hardware necessary for a complete installation.

2. **Stand-Alone Poles along Rights-of-Way with No Existing Overhead Utility Lines.**

   a. Where a stand-alone pole is proposed within a right-of-way or public utility easement with no overhead utility lines, the preferred configuration is for all equipment to be concealed within the pole itself, with an antenna/shroud mounted directly to the top of the pole and no visible transitions. No equipment shall be visible outside the pole. Equipment may, however, be placed in an underground vault.

   b. Antenna shrouds shall be the same diameter as the pole, which should be no wider than 14 inches. The bottom 66 inches of a pole (the "base") may be up to 18 inches to accommodate equipment. To prevent accumulation of trash, facilities shall be designed to avoid flat surfaces in the transition from the base to the upper pole.

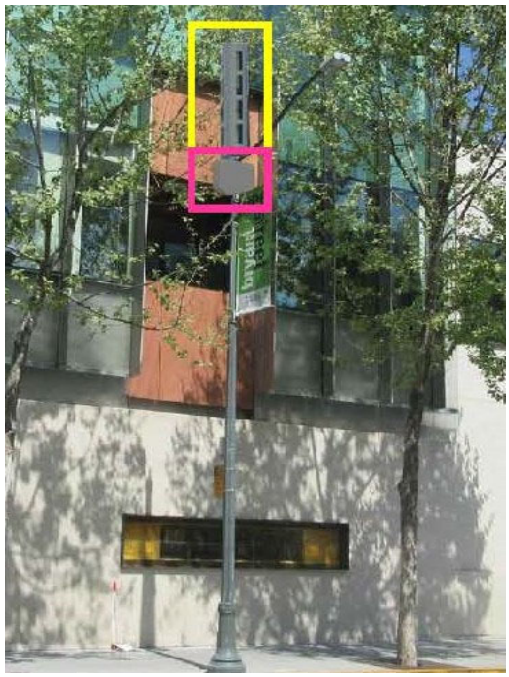

Figure 8: Stand-alone small cell poles (as shown in this example) are not preferred but may be permitted if enclosure of all equipment within the pole or in an underground vault is technically infeasible.

   c. Stand-alone poles match the height and color of any nearby streetlight or utility pole.

3. **Light Poles Wherein Equipment, Cabling, and Antennas are Not Completely within the Pole Itself and/or Entirely Under the Ground.**

   a. Use of light poles for wireless telecommunications facilities may be permitted only in areas where light poles are appropriate.

   b. The maximum height of any antenna mounted to a street light pole shall not exceed seven feet above the existing height of a street light pole in a location where the closest adjacent district is a commercial zoning district and shall not exceed three feet above the existing height of a street light pole in any other zoning district. Any portion of the antenna or equipment mounted on such a pole shall be no less than 18 feet above any drivable road surface.

   c. Antenna shrouds shall be the same diameter as the pole. The bottom 66 inches of a pole (the "base") may be up to 6 inches in diameter wider to accommodate equipment.

   d. To prevent accumulation of trash, facilities shall be designed to avoid flat surfaces in the transition from the base to the upper pole.

e. Poles shall be painted and textured to City standards to match existing streetlights in the vicinity

D. Requirements for Approval of Less-Preferred Configurations.

1. **Application Requirements.** Applications that involve less-preferred configurations may be approved only if the applicant demonstrates that:

   a. No preferred configuration would be technically feasible; or

   b. The proposed configuration would be aesthetically superior to a preferred configuration due to existing conditions at the proposed site.

   The burden of proof for demonstrating that one of these two conditions exists shall lie with the applicant.

2. **Accompanying Evidence.** Applications that involve a less-preferred configuration shall be accompanied by clear and convincing written evidence demonstrating the need for approval of the proposed configuration rather than a preferred configuration.

3. **Independent Consultant.** In reviewing a request for a less-preferred configuration, the City may hire an independent consultant at the applicant's expense to evaluate the applicant's demonstration of need for the proposed less-preferred configuration.

E. Pole Requirements.

1. **Pole Height and Width Limitations.**

   a. All poles for wireless telecommunications facilities shall be designed to be the minimum functional height and width required to support the proposed antenna installation and meet FCC requirements. Poles, antennas, and similar structures shall be no greater in diameter or other cross-sectional dimension than is necessary for the proper functioning of the facility.

   b. Pole-mounted equipment shall not exceed six cubic feet in dimension.

2. **Requirements for Replacement Poles.** If an applicant proposes to replace a pole in order to accommodate the facility, the pole shall match the appearance of the original pole to the extent feasible, unless another design better accomplishes the objectives of this section. Such replacement pole shall not exceed the height of the pole it is replacing by more than seven feet.

3. **Requirements for New Poles.** New poles shall be designed to resemble existing poles in the right-of-way, including size, height, color, materials, and style, unless (a) the existing poles are scheduled to be removed and not replaced, or (b) another design better accomplishes the objectives of this section.

F. Pole-Mounted Facilities Requirements.

1. Facilities Mounted to a Telecommunications Tower.

a. Facilities mounted to a telecommunications tower, including, but not limited to, the attached antennas, shall be designed to be the minimum functional height and width required to adequately support the proposed facility and meet FCC requirements. The applicant shall provide documentation satisfactory to the City Manager establishing compliance with this paragraph. In any event, facilities mounted to a telecommunications tower shall not exceed the applicable height limit for structures in the applicable zoning district.

b. Aside from the antenna itself, no additional equipment may be visible. All cables, including, but not limited to, electrical and utility cables, shall be run within the interior of the telecommunications tower and shall be camouflaged or hidden to the fullest extent feasible without jeopardizing the physical integrity of the tower.

2. Monopoles.

a. Monopole installations shall be situated so as to utilize existing natural or man-made features including topography, vegetation, buildings, or other structures to provide the greatest amount of visual screening.

b. All antenna components and accessory wireless equipment shall be treated with exterior coatings of a color and texture to match the predominant visual background or existing architectural elements so as to visually blend in with the surrounding development. Subdued colors and non-reflective materials that blend with surrounding materials and colors shall be used.

c. Monopoles shall be no greater in diameter or other cross-sectional dimension than is necessary for the proper functioning of the facility.

G. Accessory Equipment.

1. All accessory equipment associated with the operation of any wireless telecommunications facility shall be screened or camouflaged, and located in a manner to minimize the equipment's visibility to the greatest feasible extent.

2. Accessory equipment for facilities mounted to a telecommunications tower shall be visually screened by locating the equipment either within a nearby building, in an underground vault (with the exception of required electrical panels), or in another type of enclosed structure that shall comply with the development and design standards of the zoning district in which the accessory equipment is located. Such enclosed structure shall be architecturally treated and adequately screened from view by landscape plantings, decorative walls, fencing, or other appropriate means, selected so that the resulting screening will be visually integrated with the architecture and landscaping of the surroundings.

3. **Space Occupied**. Facilities shall be designed to occupy the least amount of space in the right-of-way that is technically feasible.

4. **Cables.** All cables, including, but not limited to, electrical and utility cables, between the pole and any accessory equipment shall be placed underground, if feasible.

5. **Wires.** All new wires needed to service the wireless telecommunications facility shall be installed within the width of the existing utility pole so as to not exceed the diameter and height of the existing utility pole.

6. **Equipment Undergrounding.** All equipment (other than the antenna, antenna supports, ancillary wires, cables and any electric meter) shall be installed underground wherever feasible.

7. With the exception of the electric meter, which shall be pole-mounted to the extent feasible, all accessory equipment shall be located underground to the extent feasible. All wireless equipment installed on poles should be completely contained within an equipment shroud. Equipment shroud and lines should be painted, treated or finished to match existing utility pole and line aesthetics. Utility line installations should have a non-reflective color and finish. Required electrical meter cabinets shall be adequately screened and camouflaged.

H. Americans with Disabilities Act Compliance. All facilities shall be built in compliance with the Americans with Disabilities Act (ADA), and no facility shall be approved that would render any portion of the right-of-way noncompliant with the ADA.

I. Other Requirements.

1. **Facilities on Decorative Streetlights Prohibited.** Small wireless facilities shall not be located on decorative streetlights.

2. **Pole Height Calculation.** Legally required lightning arresters and beacons shall be included when calculating the height of facilities. Pole height shall be is measured from the top of foundation, which should be flush with the ground, to the top of pole or top of antenna, whichever is greater.

3. **New Pole Material and Finish** New pole material and finishes should match the existing materials of the City standard streetlight poles or match aesthetics and materials of existing decorative poles.

4. **Disturbance of Topography and Vegetation.** Disturbance of existing topography and on-site vegetation shall be minimized unless such disturbance would substantially reduce the visual impacts of the facility.

5. **Separation of Service.** Separation of service shall be provided by installing all new electrical conduit(s) or using empty conduit(s) with the conduit owner's express consent in writing.

6. **Facilities on Streetlight or Traffic Signal Control Poles.** For proposed facilities on streetlight or traffic signal control poles, a hand hole should be provided at the top of the pole to maintain fiber and electrical service for streetlights and future attachments.
7. **Pole Foundation Calculations.** Pole foundation calculations shall be prepared and stamped by a California professionally licensed structural engineer and provided to the City for review. Pole foundation calculations shall account for all new and existing pole attachments and the pole.
8. **Pole Structural Calculations.** Pole structural calculations, including seismic loads, showing the load impacts of the wireless facility on City streetlight and traffic signal control poles, shall be prepared and stamped by a California professionally licensed structural engineer and provided to the City for review.
9. **Design Wind Velocity.** Design wind velocity shall be 115 miles per hour (mph) minimum in accordance with TlA-222 rev G, IBC 2012 with ASC 710, and amendments for local conditions.
10. **Trench Backfill.** Asphalt concrete sections for trench backfills shall be a thickness

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