

Public Comment #31
BOS Rcvd. 9-20-24

From: Tom R. Purciel
Sent: Friday, September 20, 2024 3:48 PM
To: BOS-Clerk of the Board
Subject: Fw: Verizon Wireless Summary Comments for BOS Wireless Workshop September 24, 2024
Attachments: Verizon Wireless Summary Comments 09.20.24.pdf

Please forward for the Legistar record per our current process.

Thanks!

Tom Purciel

Senior Planner

El Dorado County Planning and Building Department - Long Range Planning

2850 Fairlane Court, Placerville, CA 95667

(530) 621-5903

tom.purciel@edcgov.us

From: Paul Albritton <pa@mallp.com>
Sent: Friday, September 20, 2024 3:18 PM
To: Tom R. Purciel <tom.purciel@edcgov.us>; Jefferson B. Billingsley <Jefferson.Billingsley@edcgov.us>
Cc: Brian Grattidge <bgrattidge@dudek.com>; Pinto, Yvonne <yvonne.pinto@verizonwireless.com>; Jeremy Stroup <jeremy.stroup@verizonwireless.com>
Subject: Verizon Wireless Summary Comments for BOS Wireless Workshop September 24, 2024

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Tom: Attached please find Verizon Wireless's summary comments regarding the draft wireless facilities ordinance for the Board of Supervisors workshop next Tuesday, September 24, 2024. Verizon Wireless will have a representative at the workshop to review these points.

Thank you,

Paul

From: Tom R. Purciel <tom.purciel@edcgov.us>
Sent: Wednesday, September 18, 2024 1:13 PM
To: Pinto, Yvonne <yvonne.pinto@verizonwireless.com>; Brian Whitty <bwhitty@mallp.com>; Paul Albritton <pa@mallp.com>; Jeremy Stroup <jeremy.stroup@verizonwireless.com>
Cc: Jefferson B. Billingsley <Jefferson.Billingsley@edcgov.us>; Brian Grattidge <bgrattidge@dudek.com>
Subject: Re: County workshop for the 24th....Cell on wheels suggestions - Proposed Amendments to El Dorado County to the County Communications Facilities Ordinance @ Thu, Aug 1, 2024 2:00pm – 3:00pm (GMT-07)

At this time, the agenda for the upcoming Board of Supervisors Public Workshop/Study Session on 9/24/24 has not been published, however, I expect the agenda to be published within the next 1-2 business days. To make sure you and the Verizon team receive the agenda information and workshop materials as soon as they are published, I recommend all interested parties sign up for email updates at the following (e-blast) links as applicable:

Zoning Ordinance

Updates: https://service.govdelivery.com/service/subscribe.html?code=CAELDOR_216

Planning Commission

Notifications: https://service.govdelivery.com/accounts/CAELDOR/subscriber/new?topic_id=CAELDOR_25

Board of Supervisors

Notifications: https://service.govdelivery.com/service/subscribe.html?code=CAELDOR_2

Regards,

Tom Purciel

Senior Planner

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From: Pinto, Yvonne <yvonne.pinto@verizonwireless.com>

Sent: Tuesday, September 17, 2024 1:18 PM

To: Tom R. Purciel <tom.purciel@edcgov.us>; Brian Whitty <bwhitty@mallp.com>; bgrattidge@dudek.com <bgrattidge@dudek.com>; Jefferson B. Billingsley <Jefferson.Billingsley@edcgov.us>; Paul Albritton <pa@mallp.com>; Jeremy Stroup <jeremy.stroup@verizonwireless.com>

Subject: County workshop for the 24th....Cell on wheels suggestions - Proposed Amendments to El Dorado County to the County Communications Facilities Ordinance @ Thu, Aug 1, 2024 2:00pm – 3:00pm (GMT-07)

Good afternoon Tom

I found a PDF online that has a 17th date for the workshop ...I am guessing the date was changed.

Would you have a link or calendar invitation that could be shared ?

On Mon, Sep 16, 2024, 2:50 PM Pinto, Yvonne <yvonne.pinto@verizonwireless.com> wrote:

FYI...suggestions for temporary COW cell sites needed that are not emergency or event based

Best Regards,

Yvonne M. Pinto

Real Estate Specialist- Municipal Engagement

Engr III Spec-Ntwk Reg/RE

295 Parkshore Drive
Folsom, CA 95630
Cell 916-990-7308
Yvonne.Pinto@verizonwireless.com

----- Forwarded message -----

From: **Pinto, Yvonne** <yvonne.pinto@verizonwireless.com>
Date: Thu, Aug 8, 2024 at 8:31 PM
Subject: Cell on wheels suggestions - Proposed Amendments to El Dorado County to the County Communications Facilities Ordinance @ Thu, Aug 1, 2024 2:00pm – 3:00pm (GMT-07)
To: <jefferson.billingsley@edcgov.us>, Robert J. Peters <robert.peters@edcgov.us>, Tom R. Purciel <tom.purciel@edcgov.us>, <bgrattidge@dudek.com>
Cc: William Thomas (Thomas) Perrault <thomas.perrault@verizonwireless.com>, Maureen Cruzen <maureen.cruzen@verizonwireless.com>, Monica Walkenhorst <monica.walkenhorst@verizonwireless.com>

Good Evening all,

Per Robert's inquiry during our code recommendation discussion, I have put together some recommendations below for temporary site requirements that could be a good addition under the code to address COW/Temp wireless sites.

Included is an outline for reasons COW permits are requested and our recommendations for code amendments specific to these temporary requests.

Of additional note, All temporary sites have a 2 year FCC limitation...enough time to allow resolution of an outage issue or to replace a lost permanent site.

We would welcome additional discussion should you have any questions about the information and suggestions below

If a carrier is approaching the county for a Cell on Wheels temporary use permit, the reasons are usually for the following events:

1. Natural disaster emergency coverage

Depending on the nature and urgency of the disaster (flood, fires, etc)...carriers will work VERY quickly with the jurisdictions to site the needed COWs/spots, often on jurisdictionally owned parcels

2. Special Events

These are VERY short term...concerts/fairs/etc like BottleRock, Aftershock, etc....usually placed a few weeks before the event and removed a few days after the event ends

3. The carrier has an existing site servicing the area that is going off air and must be replaced temporarily while a new site location is permitted.

A temp is needed to avoid a severe impact/outage to the emergency services, residents, businesses, schools and govt services that currently rely on that existing service already present in the area.

There are many reasons an existing site might go off air and the goal of a temporary site is to avoid loss of existing service while a new site is permitted through the normal Conditional Use permit process.

In reviewing code language in other jurisdictions and identifying the best way to keep existing service transfer intact through a temp placement , we would recommend the following language be added to the code for COW applications

1. Planning administrative review for a Minor, limited or temporary use permit for telecommunications sites that are a temporary build or a COW (cell on wheels)

"Minor, limited or temporary use" means those uses which, as determined by the administrative authority, are of a lesser nature in extent or duration of use, and not intended for permanency.

Carrier temporary sites do not have penetrations into existing structures, No ground disturbance, limited time per FCC

2. Building permit... electrical permit only.

COWs usually use house power of the Landlord,..... so the only permit normally required is an electrical permit from the building dept.

A COW is specifically built to be a single unit that meets all state of California requirementsthink of a parked house trailer on wheels secured by blocks that sit above ground with the conduits running from the above ground source to the trailer.

Building permit requirements for rooftop temp locations could be on a case by case basis, based on the design.

It is not often, but there can be rooftop temporary sites that might be proposed by carriers.

The same limitations for these designs are required as are required for COWs... no existing structures penetrations are allowed, FCC time limit, conduits hung or placed without penetrations or ground disturbance, etc.

Best Regards,

Yvonne M. Pinto

Real Estate Specialist- Municipal Engagement
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Cell 916-990-7308

Yvonne.Pinto@verizonwireless.com

On Thu, Aug 1, 2024 at 3:42 PM Pinto, Yvonne <yvonne.pinto@verizonwireless.com> wrote:

It was good talking to everyone and going through the code comments.

Thank you Monica and Jay for continuing the discussions past the hour...I look forward to our follow up meeting.

Per our discussions, I will get together suggestions for a Wireless temporary use permit code process that would help deploy urgent Cell on Wheels in an expedited manner for the county

Monica will send a follow up email after this one to confirm remaining action items for the next call.

Best Regards,

Yvonne M. Pinto

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**Verizon Wireless Summary Comments
El Dorado County Wireless Ordinance
Board of Supervisors Workshop September 24, 2024**

Verizon Wireless provides the following suggestions to ensure that El Dorado County's draft wireless ordinance includes feasible standards and is consistent with federal and state law.

Code Chapter 130.40.130

F(4). Location preferences. In addition to a preference for use of existing structures, the County should adopt the following reasonable location preferences, and limit the search distance for any preferred options to ¼ mile (macro wireless facilities) or 500 feet (small cells). This will provide clear direction to applicants, County staff, and decision-makers. An alternatives analysis is meaningless without clear location preferences.

Location Preferences

1. Agricultural, rural, resource, and open space zones
2. Industrial and R&D zones
3. Commercial zones
4. Residential zones

F(13). Aesthetics. Limiting a facility's height to only 15 feet above nearby trees or structures would reduce its coverage footprint. This height limit would also reduce the signal coverage of future carrier antennas collocated underneath, which may be obstructed by trees and structures, and so would discourage collocation. To reduce the number of towers in an area, the County should encourage collocation by allowing towers of sufficient height for all carriers to achieve broad coverage without obstruction. In addition to 15 feet above nearby trees or structures, the County should allow an additional 10 feet of height for each available collocation antenna centerline.

K. Additional sites and needs analysis. There is no reason to contact a property owner if their property is infeasible for service coverage or other reasons. An alternatives analysis should be required only for a tower in a less-preferred location. Factors to discount alternatives should include inability to serve a significant gap in service, technical infeasibility, lack of access or utilities, unwilling property owner, or increased aesthetic impact.

N. Five-year review of permit. Instead of an automatic review every five years, the County should review a permit only in response to a valid complaint, following the Code's existing process for violations and enforcement. To modify an approved permit without permittee's consent would violate the permittee's vested rights, as well as California Government Code Section 65964(b), which bars counties from unreasonably limiting the term of a wireless facility permit.