

## PLANNING COMMISSION

Agenda Item No.: G.1  
Date: December 13, 2011

**CASE NUMBER:** PHG 11-0010

**APPLICANT:** Technology Associates (for AT&T)

**LOCATION:** Lot G-G-1 of Tract No. 683, Woodland Heights Glen (APN 187-720-23)

**TYPE OF PROJECT:** Specific Plan Amendment

**PROJECT DESCRIPTION:** An Amendment to the Palos Vista Specific Plan to replace a 35-foot-high wireless communication facility designed to resemble a tree with a new 35-foot-high simulated tree in order to accommodate twelve, eight-foot-high panel antennas.

**STAFF RECOMMENDATION:** Approval

**GENERAL PLAN DESIGNATION/TIER:** SPA #1

**ZONING:** SP-Palos Vista Specific Plan

### BACKGROUND/SUMMARY OF ISSUES

An Amendment to the Palos Vista Specific Plan was approved by the City Council in 2006 (City File No. 2006-20-SPA) to construct the existing AT&T wireless communication facility. The 35-foot-high simulated tree is located on an approximately 67+-acre open-space lot within the 979-acre Palos Vista Specific Plan (SP 87-01, known as Escondido Highlands). The existing AT&T facility was designed to accommodate up to six, six-foot-high panel antennas, and is proposed to be removed. The new structure would consist of a 35-foot-high simulated pine tree (40 feet to top of branches) that is designed to accommodate up to twelve, eight-foot-high panel antennas and associated radio equipment. Any additional electrical equipment would be located within the existing masonry block equipment enclosure. The additional antennas are requested to support AT&T's new 4G network. The site currently contains several other wireless communication facilities including Sprint, Nextel, Cricket and T-Mobile. An Amendment to the Specific Plan is required since wireless facilities are not listed as a permitted use within the open space areas of the Palos Vista Specific Plan. The proposed amendment would be specific to this request only, and would not add general language to the existing Specific Plan to allow other wireless communication facilities as a permitted or conditionally permitted use.

**LEGAL REQUIREMENTS:** In 1996, the U.S. Congress added a section to the Communications Act of 1934 to promote the expansion of personal wireless communications service, adding section 332(c)(7). This section preserves local zoning authority over the "placement, construction, and modification" of wireless facilities, while imposing certain federal requirements. Specifically, Section 332(c)(7) requires that state or local government decisions regarding wireless service facilities must not: 1) unreasonably discriminate between one cellular provider and another; or 2) prohibit or have the effect of prohibiting the provision of personal wireless services; or 3) be founded on "the environmental effects of radio frequency (RF) emissions *to the extent that such facilities comply* with the FCC's regulations" (emphasis added).

In summary, once the Commission is satisfied the project's RF emissions are within the federal thresholds, then the review must be based on otherwise applicable local zoning criteria. A denial of a proposed facility must not run afoul of the federal restrictions set forth as 1), 2) and 3) above.

### Staff feels that the issues are as follow:

1. Whether the design and location of the proposed facility is appropriate for the site and consistent with the Wireless Facility Guidelines.

## REASONS FOR STAFF RECOMMENDATION

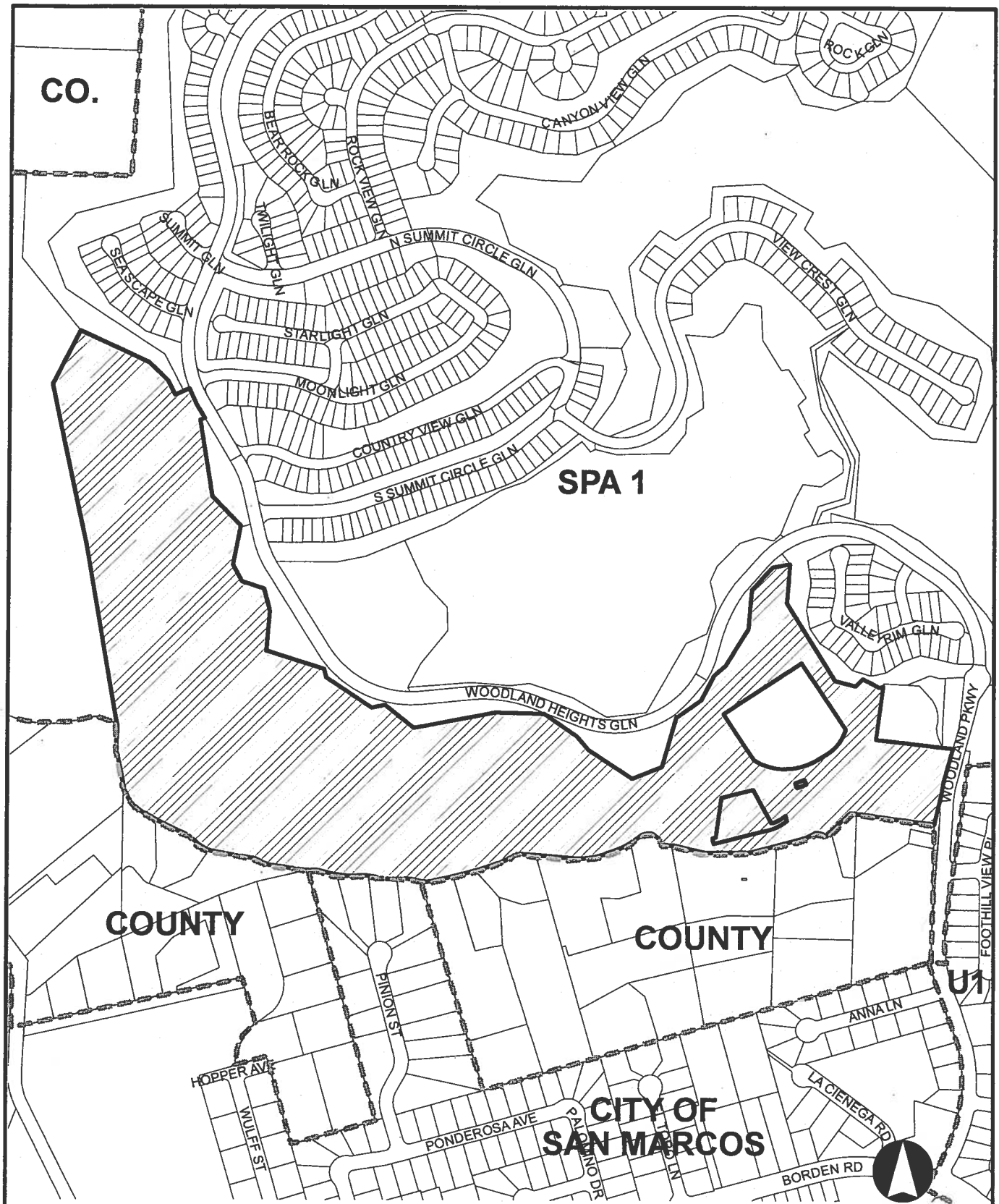
1. The proposed facility would be consistent with the Communication Antennas Ordinance since the antennas would be incorporated into a simulated tree, which is a stealthy design and would be in context with the surrounding open space setting and other simulated trees on the site. The facility would not result in any adverse individual or cumulative visual impacts; is located on a large open-space lot; blends in with the surrounding built environment; and would be in conformance with FCC emission standards.
2. Staff feels the proposed facility would not result in a potential health hazards to nearby residents since the Radio Frequency (RF) study prepared for the proposed project indicates the facility would be within maximum permissible exposure (MPE) limits and Federal Communication Commission (FCC) standards.

Respectfully submitted,



Jay Paul  
Associate Planner





CO.

**SPA 1**

COUNTY

COUNTY

**CITY OF  
SAN MARCOS**

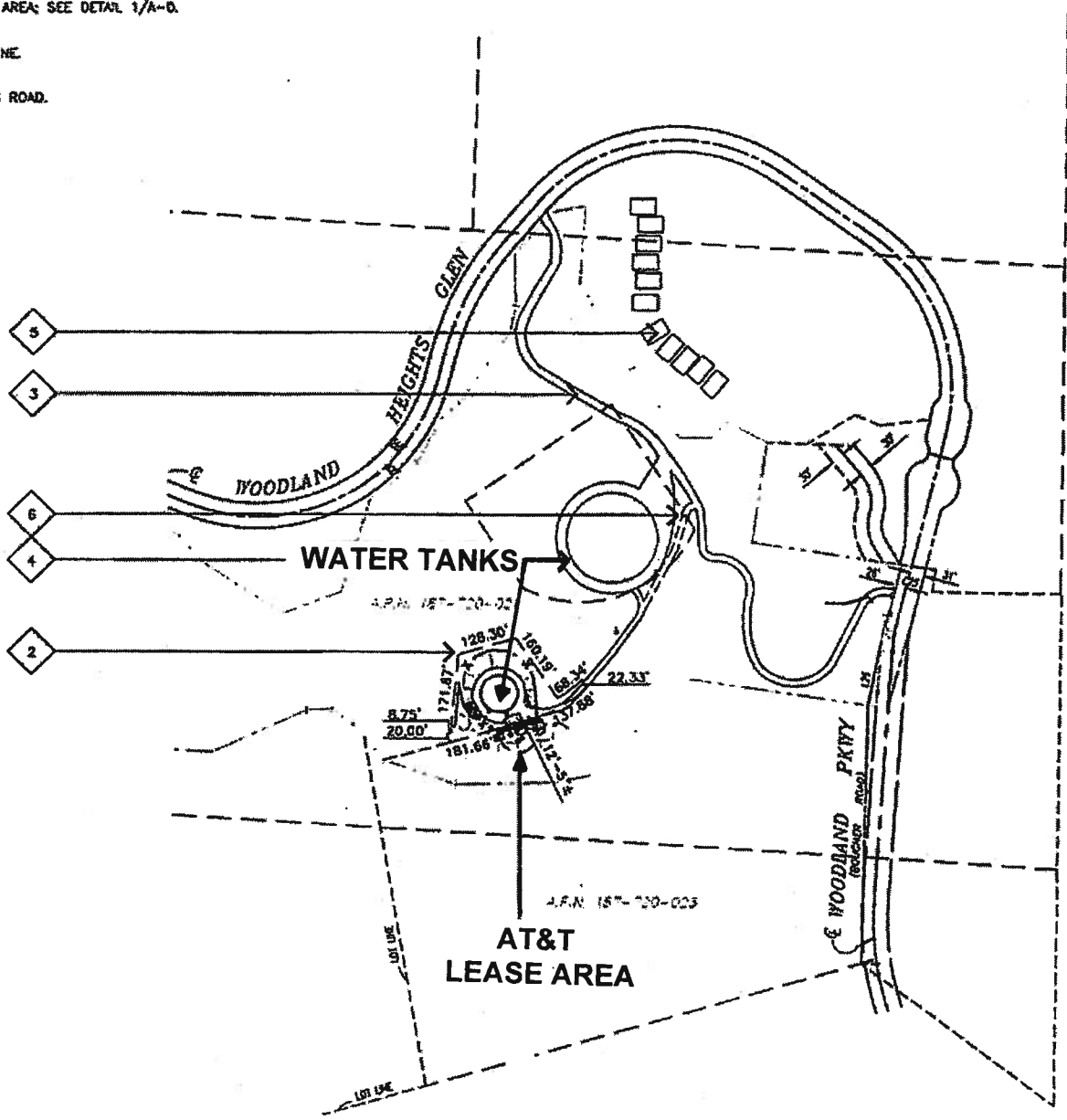
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**PROPOSED PROJECT  
PHG 11-0010**



**SITE PLAN KEYNOTES**

- 1 (C) AT&T LEASE AREA; SEE DETAIL 1/A-0.
- 2 (C) PROPERTY LINE.
- 3 ASPHALT ACCESS ROAD.
- 4 WATER TANK.
- 5 RESIDENTIAL.
- 6 GATE.



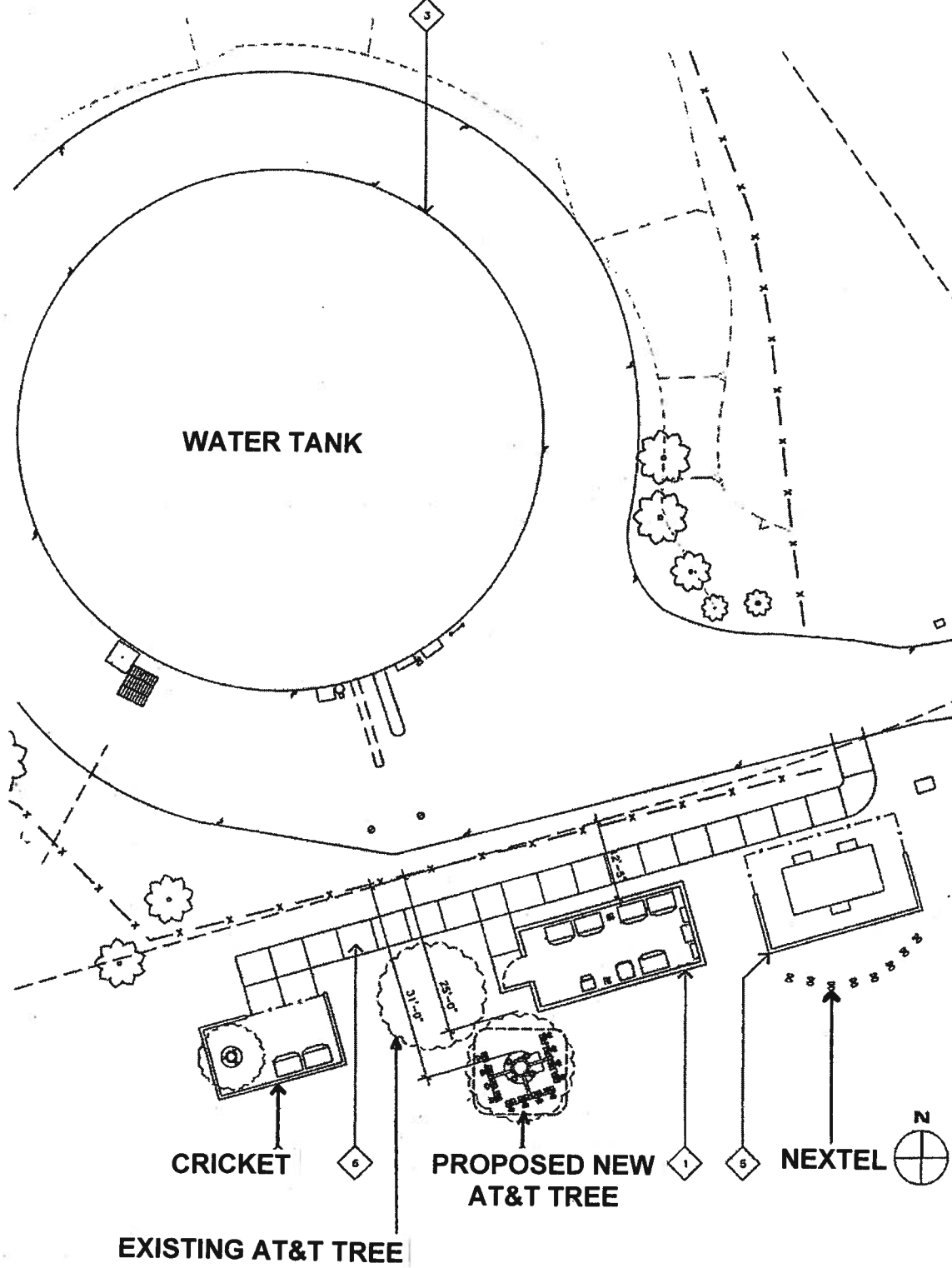
SITE PLAN

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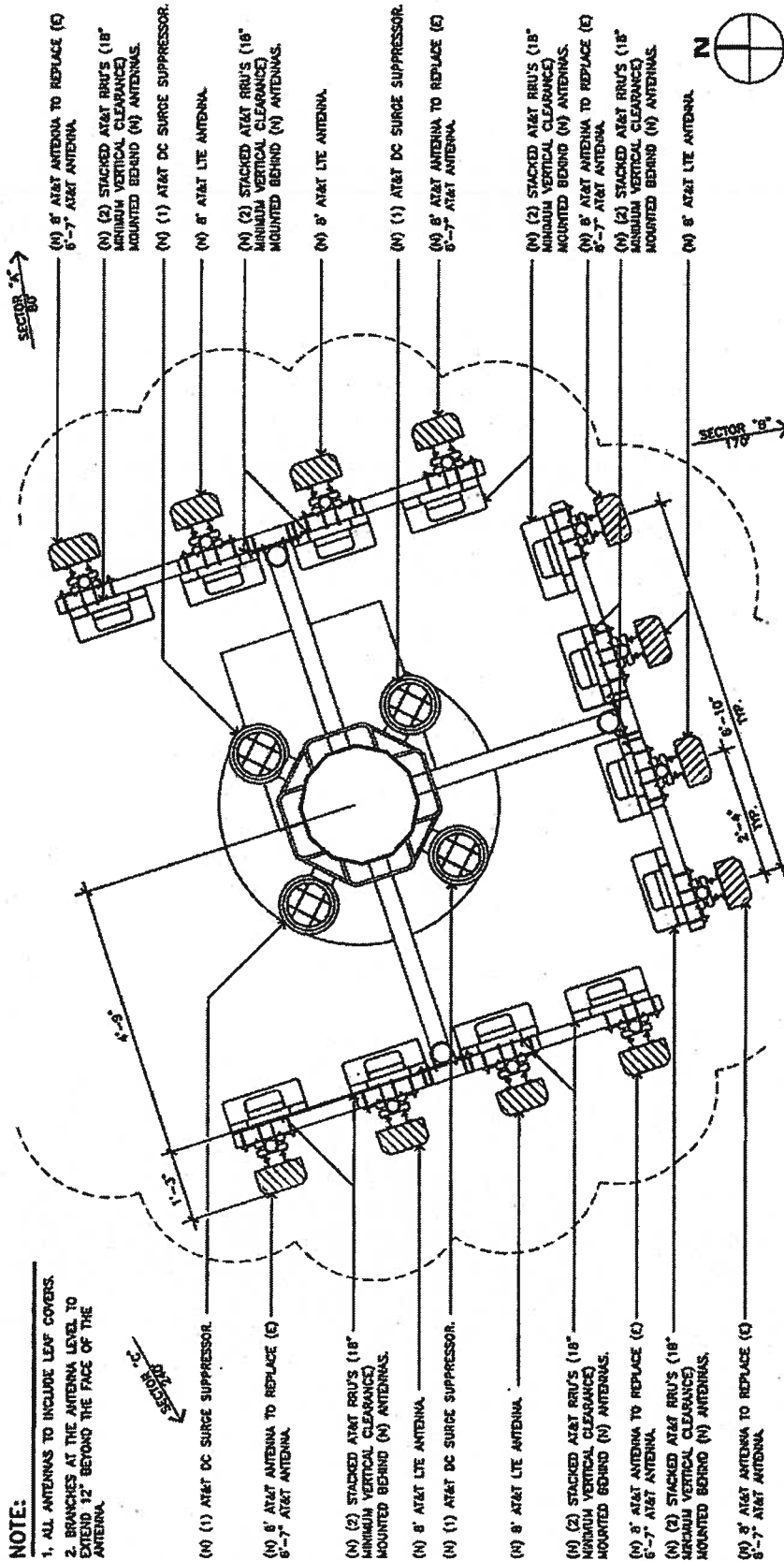
**ENLARGED SITE PLAN KEYNOTES**

- 1 (E) AT&T EQUIPMENT ENCLOSURE; SEE SHEET A-1.
- 2 (N) AT&T ANTENNAS MOUNTED ON (N) MONOROADLEAF; SEE DETAIL 1/A-3.
- 3 (E) WATER TANK.
- 4 (E) OTHER CARRIER ANTENNAS ON STEEL PIPES.
- 5 (E) CRICKET EQUIPMENT ENCLOSURES.
- 6 (E) CONCRETE WALK.
- 7 (E) MONOROADLEAF; TO BE REMOVED.



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**NOTE:**  
 1. ALL ANTENNAS TO INCLUDE LEAF COVERS.  
 2. BRANCHES AT THE ANTENNA LEVEL TO EXTEND 12" BEYOND THE FACE OF THE ANTENNA.

- (N) 8' AT&T ANTENNA TO REPLACE (E) 6'-7' AT&T ANTENNA.
- (N) (2) STACKED AT&T RRU'S (18" MINIMUM VERTICAL CLEARANCE) MOUNTED BEHIND (N) ANTENNAS.
- (N) (1) AT&T DC SURGE SUPPRESSOR.
- (N) 8' AT&T LTE ANTENNA.
- (N) (2) STACKED AT&T RRU'S (18" MINIMUM VERTICAL CLEARANCE) MOUNTED BEHIND (N) ANTENNAS.
- (N) 8' AT&T LTE ANTENNA.
- (N) (1) AT&T DC SURGE SUPPRESSOR.
- (N) 8' AT&T ANTENNA TO REPLACE (E) 6'-7' AT&T ANTENNA.
- (N) (2) STACKED AT&T RRU'S (18" MINIMUM VERTICAL CLEARANCE) MOUNTED BEHIND (N) ANTENNAS.
- (N) 8' AT&T ANTENNA TO REPLACE (E) 6'-7' AT&T ANTENNA.
- (N) (2) STACKED AT&T RRU'S (18" MINIMUM VERTICAL CLEARANCE) MOUNTED BEHIND (N) ANTENNAS.
- (N) 8' AT&T LTE ANTENNA.

ANTENNA PLAN

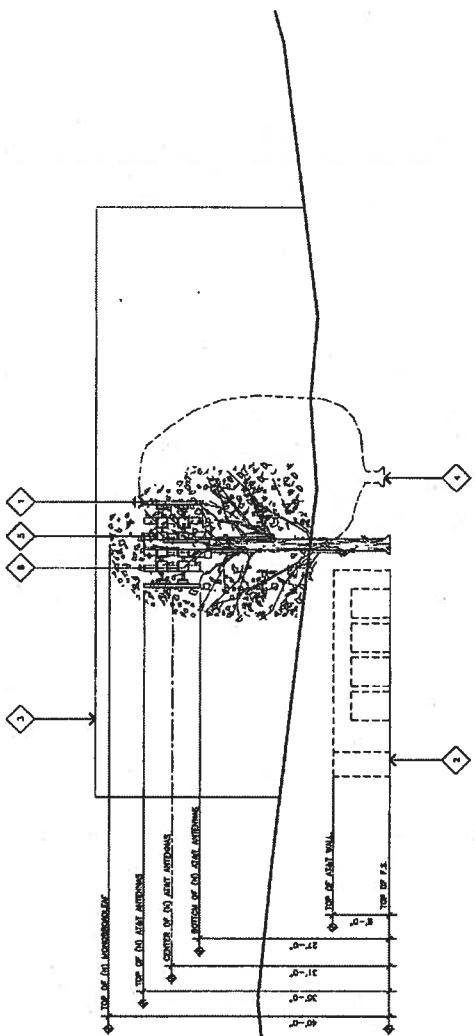
**PROPOSED PROJECT  
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SITE PLAN

**ELEVATION KEYNOTES**

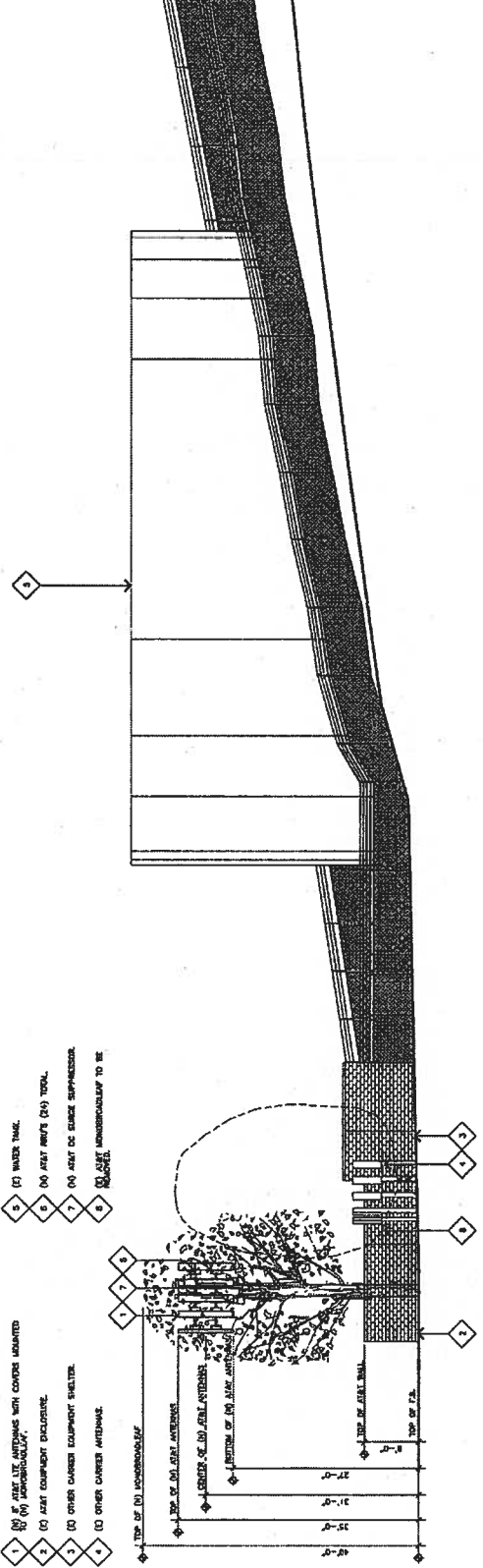
- 1 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 2 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 3 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 4 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 5 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 6 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.



**NORTH ELEVATION**

**ELEVATION KEYNOTES**

- 1 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 2 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 3 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 4 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 5 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 6 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 7 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.
- 8 (X) 6' GRASS TREE ANTENNAS WITH CONCRETE MOUNTED MONOSPANORAILWAY.



**EAST ELEVATION**

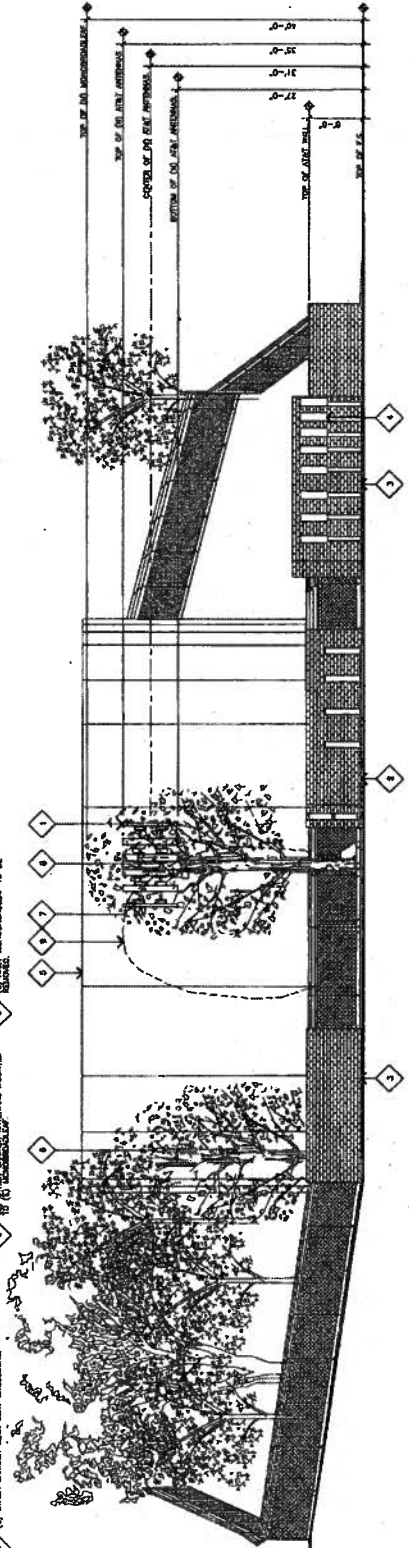
**PROPOSED PROJECT  
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**ELEVATION KEYNOTES**

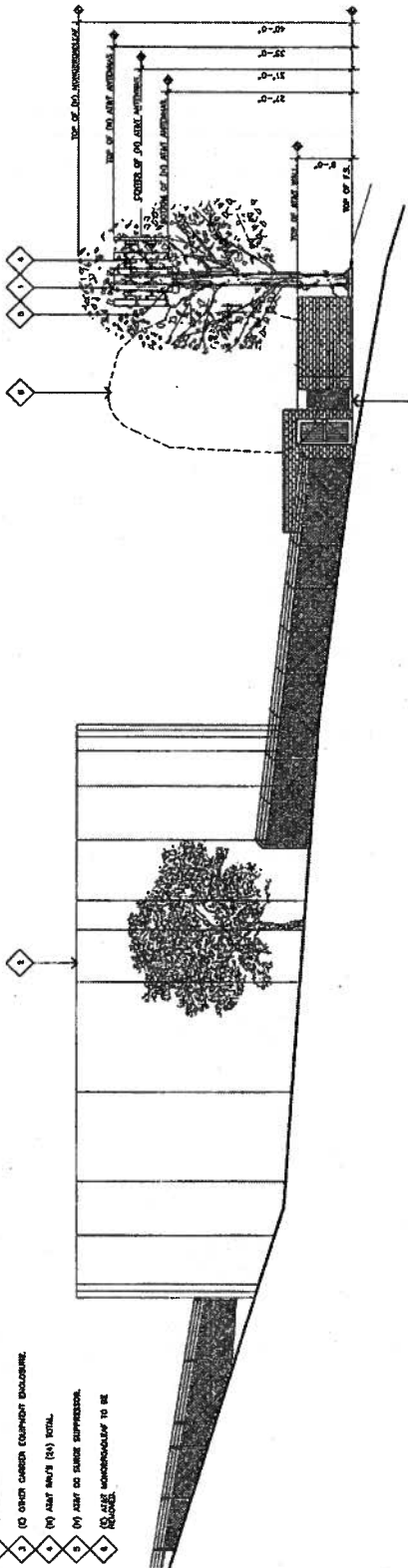
- 1 (1) SCALLOP ANTENNAS WITH COVERS MOUNTED TO ENCLOSURE
- 2 (2) AIRT EQUIPMENT ENCLOSURE
- 3 (3) OTHER CABINET EQUIPMENT ENCLOSURE
- 4 (4) OTHER CABINET ANTENNAS MOUNTED TO ENCLOSURE
- 5 (5) WATER TANK
- 6 (6) OTHER COVER ANTENNAS MOUNTED TO ENCLOSURE
- 7 (7) AIRT RAYS (24) TOTAL
- 8 (8) AIRT OR SLAKE SUPPRESSOR
- 9 (9) AIRT MONITORING TO BE RELEASED



**SOUTH ELEVATION**

**ELEVATION KEYNOTES**

- 1 (1) SCALLOP ANTENNAS WITH COVERS MOUNTED TO ENCLOSURE
- 2 (2) AIRT EQUIPMENT ENCLOSURE
- 3 (3) OTHER CABINET EQUIPMENT ENCLOSURE
- 4 (4) AIRT RAYS (24) TOTAL
- 5 (5) AIRT OR SLAKE SUPPRESSOR
- 6 (6) AIRT MONITORING TO BE RELEASED



**WEST ELEVATION**

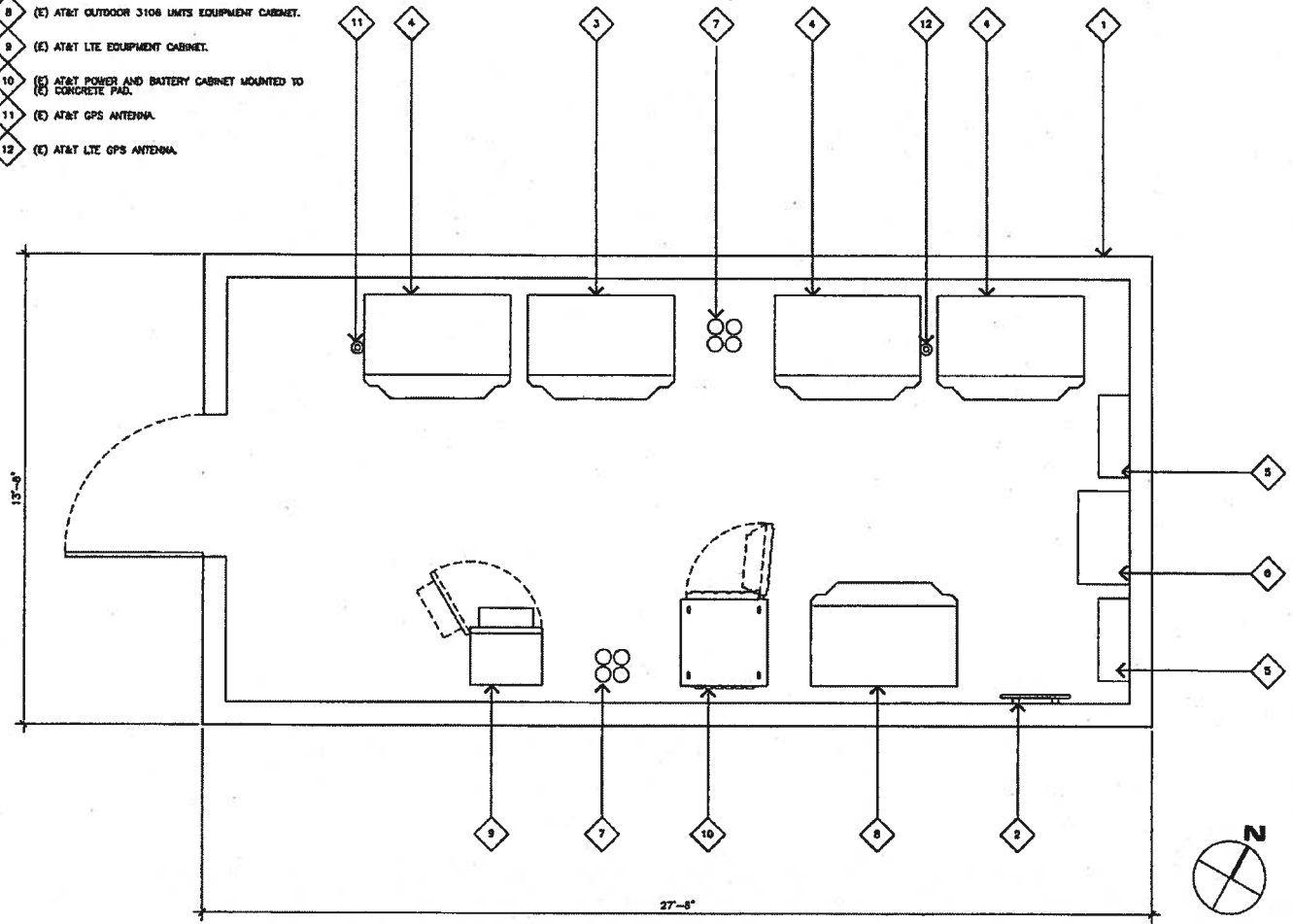
**PROPOSED PROJECT  
PHG 10-0010**



**ELEVATIONS**

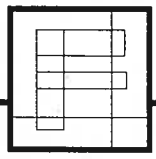
**EQUIPMENT PLAN KEYNOTES**

- 1 (E) AT&T 8'-0" HIGH CMU WALL ENCLOSURE.
- 2 (E) AT&T MBB.
- 3 (E) AT&T OUTDOOR 3108 UNITS EQUIPMENT CABINET WITH BBU.
- 4 (E) AT&T 2106 EQUIPMENT CABINET WITH BBU.
- 5 (E) AT&T ELECTRICAL PANEL MOUNTED TO (E) BLOCK WALL.
- 6 (E) AT&T FIBER CABINET MOUNTED TO (E) BLOCK WALL.
- 7 (E) AT&T COAX CABLE STUB-UPS.
- 8 (E) AT&T OUTDOOR 3108 UNITS EQUIPMENT CABINET.
- 9 (E) AT&T LTE EQUIPMENT CABINET.
- 10 (E) AT&T POWER AND BATTERY CABINET MOUNTED TO CONCRETE PAD.
- 11 (E) AT&T GPS ANTENNA.
- 12 (E) AT&T LTE GPS ANTENNA.



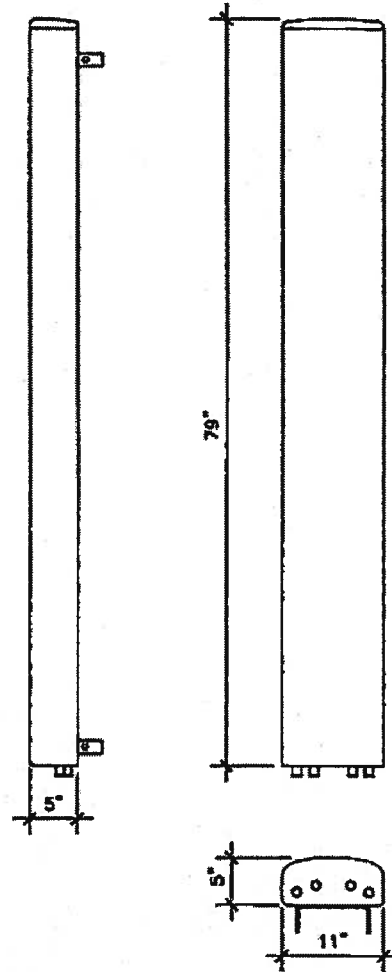
**EQUIPMENT PLAN**

**PROPOSED PROJECT  
PHG 10-0010**



FLOOR PLAN

|   |                             |
|---|-----------------------------|
| ANTENNA COLOR:  | LIGHT GREY                  |
| DIMENSIONS, HxWxD:  | 2033x280x125mm (67"x11"x5") |
| WEIGHT, WITH PRE-MOUNTED BRACKETS:                          | 44 lbs                      |
| WIND LOAD, FRONTAL/LATERAL/REAR<br>SIDE 42 m/s, Cd=1.0 (N): | 628                         |
| CONNECTOR:  | (4) 7/16 DIN FEMALE         |



PER RFDS DATED 02/06/10

**(E) ANTENNA SPECIFICATION**

**PROPOSED PROJECT  
PHG 10-0010**

DETAILS

ANTENNA MATERIAL:

GRP

ANTENNA COLOR:

LIGHT GREY

DIMENSIONS, HxWxD:

2438x300x152mm (96"X11.8"x6")

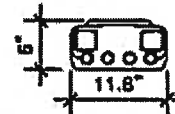
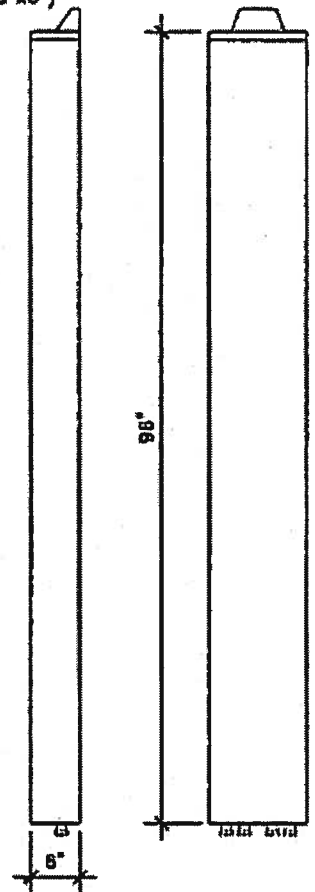
WEIGHT:

61.7 lbs

WIND LOAD, FRONTAL/LATERAL/REAR  
286 lbf/ 61 lbf/ 335 lbf

CONNECTOR:

7/16 DIN FEMALE



## (N) ANTENNA SPECIFICATIONS

**PROPOSED PROJECT  
PHG 10-0010**

DETAILS

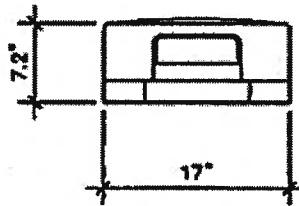
RRU COLOR: LIGHT GRAY

DIMENSIONS, HxWxD: (17"x17.8"x7.2")

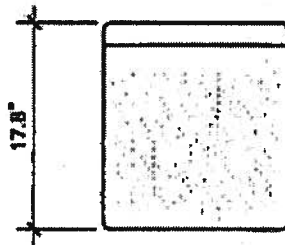
WEIGHT, WITH PRE-MOUNTED BRACKETS: 55 lbs

WIND LOAD, FRONTAL/LATERAL/REAR  
SIDE 149.8 mph, Cd=1: N/A lbs

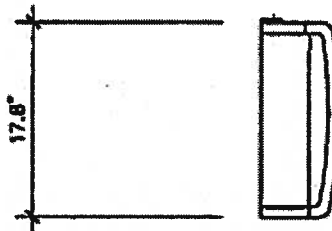
CONNECTOR: (4) 1/2 DIN FEMALE



TOP VIEW



FRONT VIEW



SIDE VIEW

### RRU CABINET

**PROPOSED PROJECT  
PHG 10-0010**

DETAILS

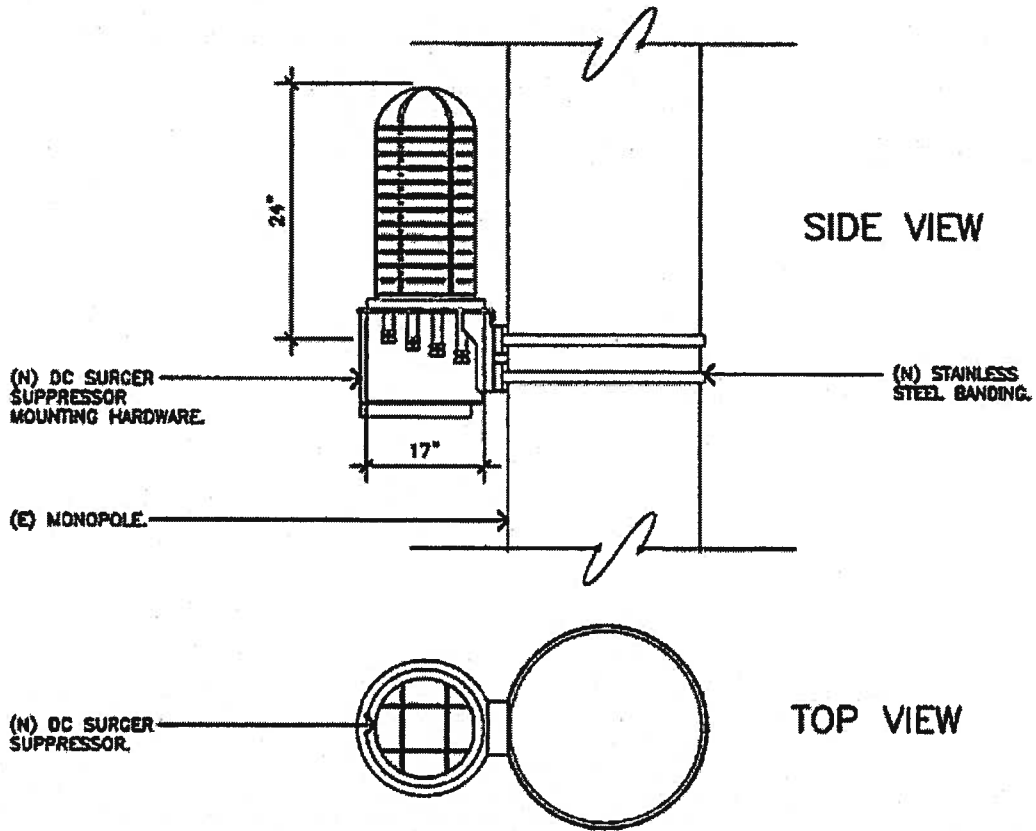
**SURGE SUPPRESSOR COLOR: LIGHT GRAY**

**DIMENSIONS, HxWxD: (10"Ø x24")**

**WEIGHT, WITH PRE-MOUNTED BRACKETS: 32.8 lbs**

**WIND LOAD, FRONTAL/LATERAL/REAR  
SIDE 149.8 mph, Cd=1: N/A lbs**

**CONNECTOR: (4) 1/2 DIN FEMALE**



## DC SURGE SUPPRESSOR

**PROPOSED PROJECT  
PHG 10-0010**

DETAILS

# ANALYSIS

## A. LAND USE COMPATIBILITY/SURROUNDING ZONING

NORTH - SPA 1 (Palos Vista Specific Plan) / A 35-foot-high Vallecitos Water District water tank is located immediately north of the subject site. Native vegetation within the open space area of the development is located further north. Views of the proposed simulated tree from the nearest homes to the north and northeast within the Palos Vista development generally would be limited due to the existing topography, height of the water tank, existing vegetation, and distance from the residences.

SOUTH - County Residential Zoning / Single-family residential homes on estate sized lots are located south of the subject site at a significantly lower elevation. Native vegetation is located on the lower slopes, and more ornamental type landscaping and tall mature trees (typically eucalyptus and oaks) are located on the residential properties. The existing wireless facility is visible from the homes to the south, and further views to the south and southeast.

EAST - R-1-7 zoning (Single-Family Residential, 7,000 SF min. lot size) / Single-family residential homes are located southeast of the site within the County jurisdiction at a lower elevation than the project site. Single-family homes also are located on the eastern side of Woodland Parkway within the City. The site is visible from some views to the east.

WEST - SPA 1 / (Palos Vista Specific Plan) / Open space property is located immediately west of the facility on the hillside terrain. Native vegetation covers most of the open space area. Single-family homes located within the county are located further west and southwest at a lower elevation. Views of the site from the west generally are obscured by topography and/or large mature trees. The site is visible from some views to the southwest.

## B. AVAILABILITY OF PUBLIC SERVICES

1. Effect on Police Service - The Police Department expressed no concern regarding the proposed project and their ability to provide service to the site.
2. Effect on Fire Service - The Fire Department indicated that adequate services can be provided to the site and the proposed project would not impact levels of service.
3. Traffic – The Engineering Department indicated the project would not have any impacts to existing traffic or circulation within the area.
4. Utilities – The Engineering Department indicated the project would not have any impacts to any existing City utilities. Water service to the site is provided by the Vallecitos Municipal Water District.
5. Drainage – The Engineering Department determined the project would not materially degrade the levels of service of the existing drainage facilities.

## C. ENVIRONMENTAL STATUS

1. The proposal is exempt from the requirements of the California Environmental Quality Act (CEQA) in conformance with Section 15303, "New Small Facilities or Structures." A Notice of Exemption was prepared for the proposed project. In staff's opinion, the request does not have the potential for causing a significant effect on the environment due to the relatively small size of the facility and would be located within a previously disturbed area. The site contains several other wireless communication facilities and a Vallecitos above-ground water tank is adjacent to the west. The subject lease area does not contain any sensitive vegetation, nor would the project encroach into native vegetation areas.
2. In staff's opinion, no significant issues remain unresolved through compliance with code requirements and the recommended conditions of approval. Staff feels the proposed facility would not result in a potential health hazard to

nearby residents since the Radio Frequency (RF) study prepared for the proposed project indicates the facility would be within maximum permissible exposure (MPE) limits and Federal Communication Commission (FCC) guidelines. The property is gated and public access is restricted.

3. The project will have no impact on fish and wildlife resources as no sensitive or protected habitat occurs within the proposed development area or will be directly impacted/removed by the proposed project.

#### **D. GENERAL PLAN ANALYSIS**

General Plan - The General Plan land-use designation on the site is SPA 1, which calls for the area to be developed with residential uses and open space areas. The proposed amendment to the Palos Vista SPA would allow a wireless facility on this specific site within the open space area. This would be consistent with General Plan Policy III (Page VIII-4) regarding Plan Description for Specific Plan Area 1, which states: "The development plan is based on an analysis identifying the most appropriate areas for development." The project site is within an area that previously has been disturbed with major utilities to service the surrounding area (Vallecitos water tanks) and other wireless facilities previously have been developed on the subject site. Adequate access is provided to the site with a paved road and the project would not result in a loss of sensitive habitat.

#### **E. PROJECT ANALYSIS**

##### **Appropriateness of the Proposed Design and Whether the Proposed Wireless Facility Would Be in Conformance with the Communication Antennas Ordinance**

AT&T proposes to remove their existing 35-foot-high wireless facility that currently contains six, six-foot-high panel antennas and replace it with a 35-foot-high faux tree to accommodate twelve, eight-foot-high panel antennas. The top of the branches would extend up to five feet above the top of the antenna panels (up to 40 feet) to provide a more natural appearance. The applicant indicated the new pole is necessary to structurally support the additional antennas. The new tree would be located in front of the existing tree, which would be removed. The existing tree is one of the earlier faux tree models, and the proposed new tree would appear much more realistic in appearance and provide better coverage/screening of the panels since the number of branches could be increased. The site is visible from residences to the south and southeast and several design options were discussed with the applicant to ensure the larger panels could be properly integrated into a new tree, which included reducing the size of the antennas from eight feet in height to six feet in height; reducing the number of antennas from twelve to nine; and also whether a faux broadleaf tree could adequately screen the taller antennas or should a faux pine tree be used. Although the six-foot-high antennas would be adequate to support the proposed 4G upgrade, AT&T prefers the eight-foot-high antennas since they would provide a much better coverage over a longer distance, and has provided a coverage map comparing the two sizes of antennas (attached). The applicant also feels the newer tree design would properly screen the longer panels and therefore would be appropriate for this open-space site.

The Design Review Board discussed the appropriateness of the project on October 27, 2011, and recommended approval of the design (vote 6-1, Bell voting no). The majority of the Board members felt the eight-foot-high antennas would be appropriate for the simulated tree due to its distance from surrounding views and the quality of the newer trees. Some of the board members felt a simulated pine tree should be used due to its ability to further screen antenna panels, but the board members also indicated that due to the distance from adjacent views, a simulated broadleaf or pine tree would be appropriate. The existing simulated trees on the site are the broadleaf variety and the existing mature trees are eucalyptus and pepper trees. Staff feels that due to the length and number of the new antennas, a pine tree should be used since they can more effectively screen the panels and also seem to have less maintenance and fading issues than the broadleaf trees. In addition, the pine tree would be able to blend into the surrounding environment and would not appear out of place with the existing types of broadleaf trees due to its distance from nearby residences. The applicant supports the use of the pine tree design.

Staff feels the proposed facilities would be in conformance with the Wireless Facilities guidelines since the antennas would be incorporated into a simulated tree, which is a stealthy design and would be in context with the surrounding open space setting and other simulated trees on the site. The proposed eight-foot-high antenna panels would be screened within the branches of the tree and covered in appropriate faux leaf materials. There also are other mature trees located on the site to provide the appropriate context, and the height of the tree would be consistent with the height limits within the SPA. Only minor ground disturbance is required to provide the appropriate foundation for the new facility, which would not impact any native vegetation or cultural resources. The facility also would be in conformance with FCC emission standards.



### **Conformance with FCC Emission Requirements**

Operation of the facility would generate radio frequency electromagnetic emissions (RF radiation) and the Federal Communication Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public and occupational exposures to RF energy fields. The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupation/controlled exposure limits (for workers) and general public/uncontrolled exposure limits (for the general public). A RF study was prepared for the project by EBI Consulting to determine whether the proposed communication facility complies with the FCC Radio Frequency Safety guidelines. The study assumes a worst case scenario with the facility operating at maximum capacity, and compares the figures to existing standards. Due to the existing communication facilities on the site, actual measurements were conducted to establish a baseline for a cumulative analysis. A copy of the study has been attached with this report. The report indicated there are no modeled areas on any accessible ground-level walking/working areas related to the proposed AT&T antennas that exceed the FCC occupational or general public exposure limits. In addition, there are no measured areas on any accessible ground or working/walking areas that exceed the FCC occupational or general public exposure limits. At the nearest walking/working surfaces to the AT&T antennas, the predicted maximum power density generated by the AT&T antennas is approximately 4.2 percent of the FCCs general public limit (0.84 percent of the FCCs occupational limit). The predicted composite exposure level from all carriers on the site is approximately 62 percent of the FCCs general public limit (12.40 percent of the occupational limit). Access to the site by the general public is limited since the paved access road to the site is gated at the Woodland Parkway entrance. The proposed antennas also would be elevated approximately 27 feet above ground level, and would require workers to be elevated to antenna level to access the panels. Therefore, the antennas are not accessible to the general public.

# SUPPLEMENT TO STAFF REPORT/DETAILS OF REQUEST

## A. PHYSICAL CHARACTERISTICS

The subject lease area is relatively flat and has been previously cleared and graded to accommodate two existing above-ground water tanks, and access road, and other wireless communication facilities. No sensitive animal species or significant habitat areas are known to be present within the proposed lease/improvements area(s). The development area contains a variety of mature trees, including eucalyptus and California Pepper. Native and non-native vegetation surrounds the site on the steeper slope areas.

## B. SUPPLEMENTAL DETAILS OF REQUEST

1. Property Size: 67+ acres
2. Pole Height: Approx. 35' to top of antennas, and 40' top of branches
3. Antennas:
  - Existing: Six, 6'-7"-high panel antennas.
  - Proposed: Twelve, 8'-high panel antennas  
Antennas painted dark green to blend in with the simulated tree and covered in "sock" material to match branches/leaves.
4. Power Density: AT&T- 4.2% of the FCC General Public Limit for Maximum Public Exposure (MPE).  
Cumulative from all carriers – approx. 62%
5. Radio Units and Surge Protectors: 24 stacked Remote Radio Units (RUs) 17.8" H x 17.8" W x 7.2" D  
4 Surge Protectors 24" tall x 17" circumference  
Additional Dual Band Tower Mounted Amplifier Units (TMAs) 13.9" H x 6.7" W x 5.4" mounted behind the panel antennas may be added, but are not shown on the plans.  
  
All units painted to blend in with the simulated tree
6. Equipment: Existing equipment and equipment building painted green.
7. Hours of Operation  
Wireless Facility: 24 hours, unmanned

### Other Wireless Facilities:

- 96-18-CUP Sprint: (formally Cox PCS): Six panel antennas mounted onto six, 19.5-foot-high poles
- 2000-17-SPA/CUP Nextel: Eight panel antennas mounted onto eight, 12-foot-high poles.
- 2006-20-SPA AT&T (formally Cingular): 35-foot-high faux broad-leaf tree with up to six panel antennas.
- 2006-24-CUP Cricket: 35-foot-high faux broad-leaf tree with up to three panel antennas.
- 2007-07-SPA T-Mobile: 35-foot-high faux broad-leaf tree supporting up to nine panel antennas.
- PHG 09-0032 Clearwire: Move two of the existing Nextel antennas onto the two vacant poles, and install two new Clearwire rectangular antennas onto two of the support poles. Clearwire also would install two round directional antenna onto two of the existing poles below their new rectangular antennas and also mount an additional round antenna onto the block equipment enclosure for a total of five new Clearwire antennas and six Nextel antennas. Project never was implemented and the CUP and building permit has expired.

**EXHIBIT "A"**  
**FINDINGS OF FACT**  
**PHG 11-0010**

Conditional Use Permit

1. General Plan Residential Policy B2.1 (page II-17) states that residential neighborhoods shall be protected from the encroachment of incompatible activities which may have a negative impact on the residential living environment. Granting this Amendment to the Palos Vista Specific Plan to allow a personal wireless communication facility on the subject property would not conflict with this policy and would be based on sound principles of land use since the use is in response to services required by the community and the facility would enhance communication services in the city without posing a health threat to the surrounding area. The proposed simulated tree would replace an older existing simulated tree, and the panels would be appropriately integrated into the design of the tree. Any additional ground equipment would be located within an existing equipment enclosure. The proposed antennas and equipment enclosure area would not adversely affect the current operation of the site, or any future uses of the site in conformance with the underlying Specific Plan Open Space land-use category or zoning. The facility also would not result in a potential health hazard to nearby residents since the facility would be within MPE (maximum permissible exposure) limits as indicated in the radio frequency analysis prepared for the project. The proposed facility would be in compliance with the City's Wireless Facility Guidelines, as discussed in the Planning Commission staff report dated December 13, 2011.
2. The proposed personal wireless communication facility would be located within the Specific Plan zone. The proposed facility would not result in a substantial alteration of the present or planned land use since the site is zoned open space and there are several other wireless communication facilities located on the site. The project site and adjacent property currently is developed with two large above ground water tanks, support buildings, paved access road and several other wireless communication facilities. The proposal would not cause deterioration of bordering land uses or result in any adverse visual impacts since the antennas/facility are designed to integrate into the built environment with the use of a simulated tree. The proposed antenna panels would be screened within the branches of the trees and covered in appropriate faux leaf materials. There also are other mature trees located on the site to provide the appropriate context. The height of the tree would be consistent with the height limits within the SPA. Only minor ground disturbance is required to provide the appropriate foundation for the new facility. The existing equipment enclosure is painted to blend in with the adjacent hillside vegetation and colors.
3. The proposed personal wireless communication facility would not be hazardous to the health of nearby residents since the radio frequency (RF) analysis prepared for the project concluded the maximum operation levels of radiation for the facility would be within the MPE (Maximum Permissible Exposure) limit established by FCC requirements. The proposed equipment would be secured within a locked enclosure area.
4. The proposal is exempt from the requirements of the California Environmental Quality Act (CEQA) in conformance with Section 15303, "New Small Facilities or Structures" A Notice of Exemption was prepared for the proposed project. The request does not have the potential for causing a significant effect on the environment due to the relatively small size of the facility and it would be located within a previously disturbed area. The site contains several other wireless communication facilities and a Vallecitos above-ground water tank is adjacent to the west. The subject lease area does not contain any sensitive vegetation, nor would the project encroach into native vegetation areas, nor would the project impact any cultural or archaeological sites.
5. The proposed Amendment to the Palos Vista Specific Plan has been considered in relationship to its effect on the community, and the request would be in compliance with the General Plan Policies and the Wireless Facility Guidelines, and would not result in a negative impact to the adjacent neighborhood for the reasons stated above and detailed in the Planning Commission staff report and radio frequency analysis.

## EXHIBIT "B"

### CONDITIONS OF APPROVAL PHG 11-0010

#### General

1. All construction shall comply with all applicable requirements of the Escondido Zoning Code and requirements of the Planning Department, Director of Building, and the Fire Chief.
2. The legal description attached to the application has been provided by the applicant and neither the City of Escondido nor any of its employees assume responsibility for the accuracy of said legal description.
3. Prior to or concurrent with the issuance of building permits, the appropriate development fees and Citywide Facility fees shall be paid in accordance with the prevailing fee schedule in effect at the time of building permit issuance, to the satisfaction of the Director of Planning and Building.
4. The facility shall be subject to all relevant conditions of previous city approvals for this wireless facility, unless specifically amended by this use permit.
5. All exterior lighting shall conform to the requirements of Article 1072, Outdoor Lighting (Ordinance No. 86-75).
6. As proposed, the design, color and materials of the proposed facilities shall be in accordance with the staff report, exhibits and the project's Details of Request, including the following to the satisfaction of the Planning Division and include the following, which shall be clearly indicated on the building plans:
  - a. All details of the proposed tree shall be clearly shown on the building plans, including the number and length of the branches. An appropriate number of branches shall be incorporated into the design to provide for a full looking tree, with sufficient density to adequately screen the panels, to the satisfaction of the Planning Division.
  - b. The central pole shall be clad with a realistic looking bark covering to match the type of simulated tree selected.
  - c. All panel antennas shall be clad with the appropriate "sock" with a dense amount of materials. The actual detail or spec. shall be indicated on the plans.
  - d. The number and placement of branches shall provide a natural tree silhouette and the branches shall extend an appropriate distance past the antennas to provide appropriate screening. This shall be indicated on the plans.
7. All proposed signage associated with the project must comply with the City of Escondido Sign Ordinance (Ord. 92-47) and the exhibits included in the staff report(s), to the satisfaction of the Planning Division. Appropriate signs providing notice, caution or warning, and other necessary markings, shall be placed at the main site access point(s) and other locations, as may be required, in order to alert maintenance or other workers approaching the antennas to the presence of RF transmissions and to take precautions to avoid exposures in excess of FCC limits. The requirement for the appropriate signage/notice shall be indicated on the building plans.
8. AT&T or any subsequent operator/lease holder of the wireless facility agrees to investigate any complaints related to possible interference with electronic equipment in the surrounding area to determine the cause of the interference. Any interference shall be resolved in a timely manner to the satisfaction of the Director of Community Development. If the facility is determined to be the cause of the electronic interference, AT&T shall solve the problem in a timely manner to the satisfaction of the complainant and the Director of Community Development. In addition, any interference with public safety communications shall be corrected immediately, to the satisfaction of the City of Escondido.
9. All project generated noise shall conform to the City's Noise Ordinance (Ordinance 90-08).
10. If requested by the City of Escondido, AT&T, or any subsequent operator/lease holder of the facilities shall permit co-location of other wireless providers on its facility (subject to City of Escondido Approval) if it can be demonstrated that there would be no adverse effect on the existing facilities/operations.

11. AT&T shall select an independent third party consultant to conduct actual power density measurements of the facility within 90 days after installation and under full operation of the facility. The results of the study shall be submitted to the Director of Community Development so that the theoretical power density study can be compared to the actual output to ensure compliance with FCC requirements.
12. AT&T or any subsequent operator/lease holder of the wireless facility shall be responsible for all on-going maintenance of the facility, including the antennas and supporting equipment to ensure the condition of the facility does not appear weathered. Any required landscaping shall be permanently maintained in a flourishing manner. Any required irrigation shall be maintained in fully operational condition.
13. All communication facilities on the site shall be promptly removed upon non use of the facilities, to the satisfaction of the Planning Division and Building Department.
14. Any permanent, temporary or stand-by emergency generators must be in conformance with the City's Ordinance and regulations regarding electric generating facilities.
15. All new utilities and utility runs shall be underground.
16. No additional antennas or expansion of this facility shall be permitted without a modification of the Conditional Use Permit and a public hearing before the Planning Commission. Minor changes within the approved size and design parameters may be permitted by the Director of Community Development.
17. Any proposed private security gates shall provide rapid reliable access by means of a key box to provide immediate access for firefighting purposes.
18. The Conditional Use Permit shall be null and void if not utilized within twelve months of the effective date of approval, as determined by the Planning Division.
19. This Conditional Use Permit only is for AT&T equipment on the existing facility located on the site. The number of antennas approved by this Conditional Use Permit shall be used solely for AT&T and not transferred or subleased to any other carriers unless approved by the City.
20. This item may be referred back to the Planning Commission upon recommendation of the Director of Community Development for review and possible revocation or modification of the Conditional Use Permit upon receipt of nuisance complaints regarding the facility or non-compliance with the Conditions of Approval.
21. A copy of these Conditions of Approval shall be submitted with the submittal of the building plans indicating compliance with all of the Conditions and Details of Request and exhibits contained in the Planning Commission staff report.
22. Prior to final of the building permit and operation of the facility, any graffiti on the facility shall be removed or painted over to match the existing structures. Any required landscaping of the original approval shall be replaced if missing or dead. Irrigation shall be repaired as necessary.
23. The building plans shall include a site plan that delineates the areas adjacent to the facility that contain native habitat, with a note indicating that none of the natural habitat is to be disturbed. The plans also shall include the installation of an appropriate sign on the site (and location and of the sign) that indicates this restriction during all construction activities.
24. The City of Escondido hereby notifies the applicant that the County Clerk's Office requires a documentary handling fee of \$50.00 in order to file a Notice of Exemption for the project (environmental determination for the project). The applicant shall remit to the City of Escondido Planning Division, within two working days of the final approval of the project (the final approval being the hearing date of the Planning Commission or City Council, if applicable) a check payable to the "San Diego County Clerk" in the amount of \$50.00. In accordance with California Environmental Quality Act (CEQA) section 15062, the filing of a Notice of Exemption and the posting with the County Clerk starts a 35 day statute of limitations period on legal challenges to the agency's decision that the project is exempt from CEQA. Failure to submit the required fee within the specified time noted above will result in the Notice of Exemption not being filed with the County Clerk, and a 180 day statute of limitations will apply.



CITY OF ESCONDIDO  
PLANNING DIVISION  
201 NORTH BROADWAY  
ESCONDIDO, CA 92025-2798  
(760) 839-4671

### Notice of Exemption

To: San Diego County Recorder's Office  
Attn: Linda Kesian  
P.O. Box 121750  
San Diego, CA 92112-1750

From: City of Escondido  
201 North Broadway  
Escondido, CA 92025

**Project Title/Case No.:** PHG 11-0010 (AT&T Wireless)

**Project Location - Specific:** Lot G-G-1 of Tract No. 683, Woodland Heights Glen (APN 187-720-23)  
addressed as 1901 Woodland Parkway

**Project Location - City:** Escondido, **Project Location - County:** San Diego

**Description of Project:** An Amendment to the Palos Vista Specific Plan replace the older, 35-foot-high wireless communication facility designed to resemble a tree with a new 35-foot-high simulated tree in order to accommodate twelve, eight-foot-high panel antennas and associated radio and electrical equipment. The existing faux tree would be removed.

**Name of Public Agency Approving Project** City of Escondido

**Name of Person or Agency Carrying Out Project**

Name Franklin Orozco (TAIC) rep. for AT&T Telephone (619) 632-2569

Address 5473 Kearny Villa Road, Suite 300 San Diego, CA 92123


Private entity     School district     Local public agency     State agency     Other special district

**Exempt Status:** Categorical Exemption. Section 15303, "New Small Facilities or Structures."

**Reasons why project is exempt:**

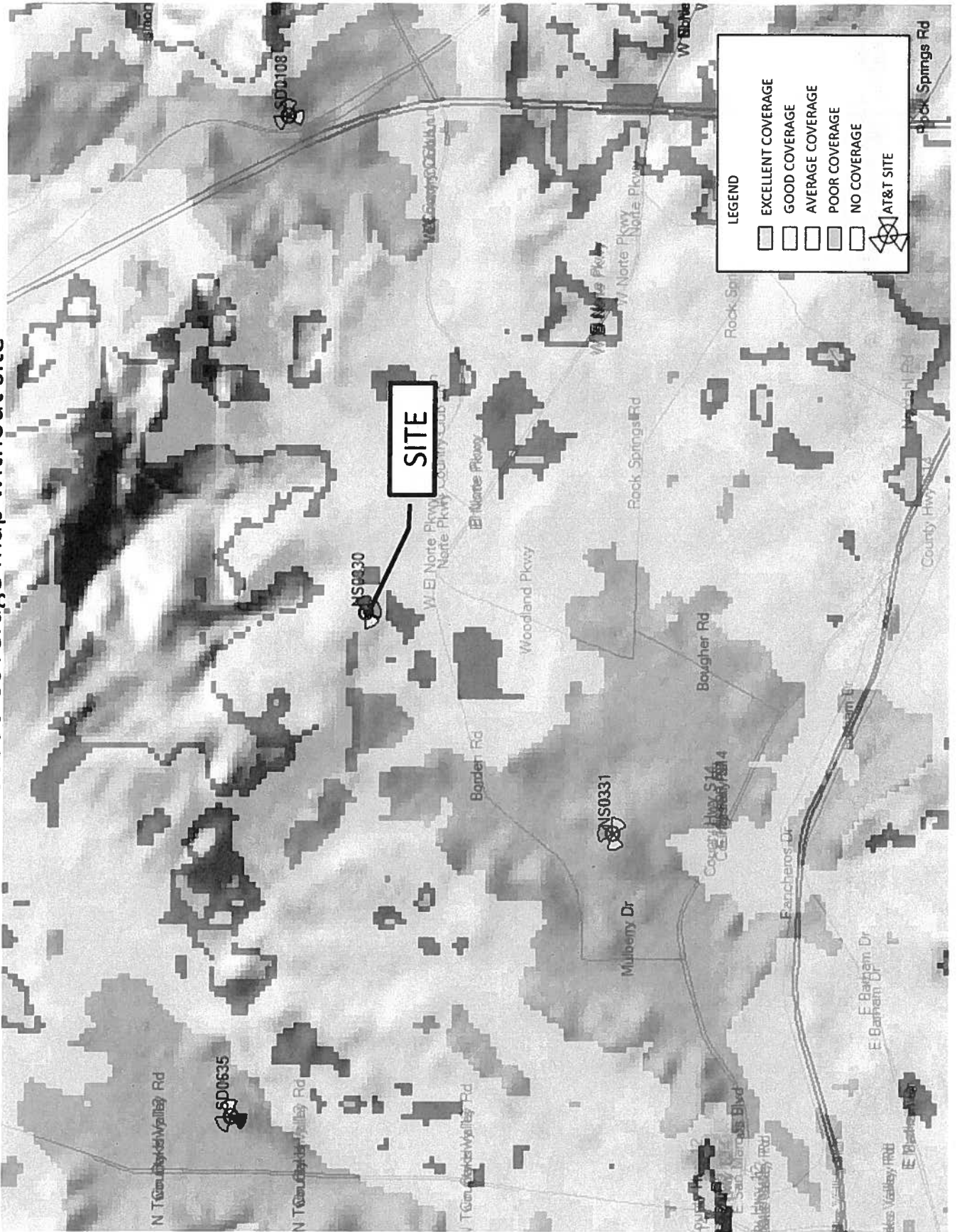
1. The proposed facility would be consistent with the Communication Antennas Ordinance since the antennas would be incorporated into a simulated tree, which is a stealthy design and would be in context with the surrounding open space setting and other simulated trees on the site. The facility would not result in any adverse individual or cumulative visual impacts; is located on a large open-space lot; blends in with the surrounding built environment; and would be in conformance with FCC emission standards.
2. The size of the proposed facility is relatively small in area and the new facility would replace an existing facility that would be removed from the site. No significant grading or removal of native vegetation is proposed or required. All service and access to the proposed wireless facility are available and would be in conformance with local standards.
3. The proposed facility would not be hazardous to the health of nearby residents or the general public since the facility would be within maximum permissible exposure (MPE) limits and Federal Communication Commission (FCC) standards.

**Lead Agency Contact Person:** Jay Paul, Planning Division Area Code/Telephone/Extension (760) 839-4537

Signature:  November 11, 2011  
Jay Paul, Associate Planner Date

Signed by Lead Agency    Date received for filing at OPR: N/A  
 Signed by Applicant

AT&T NS0330 Coverage map without site



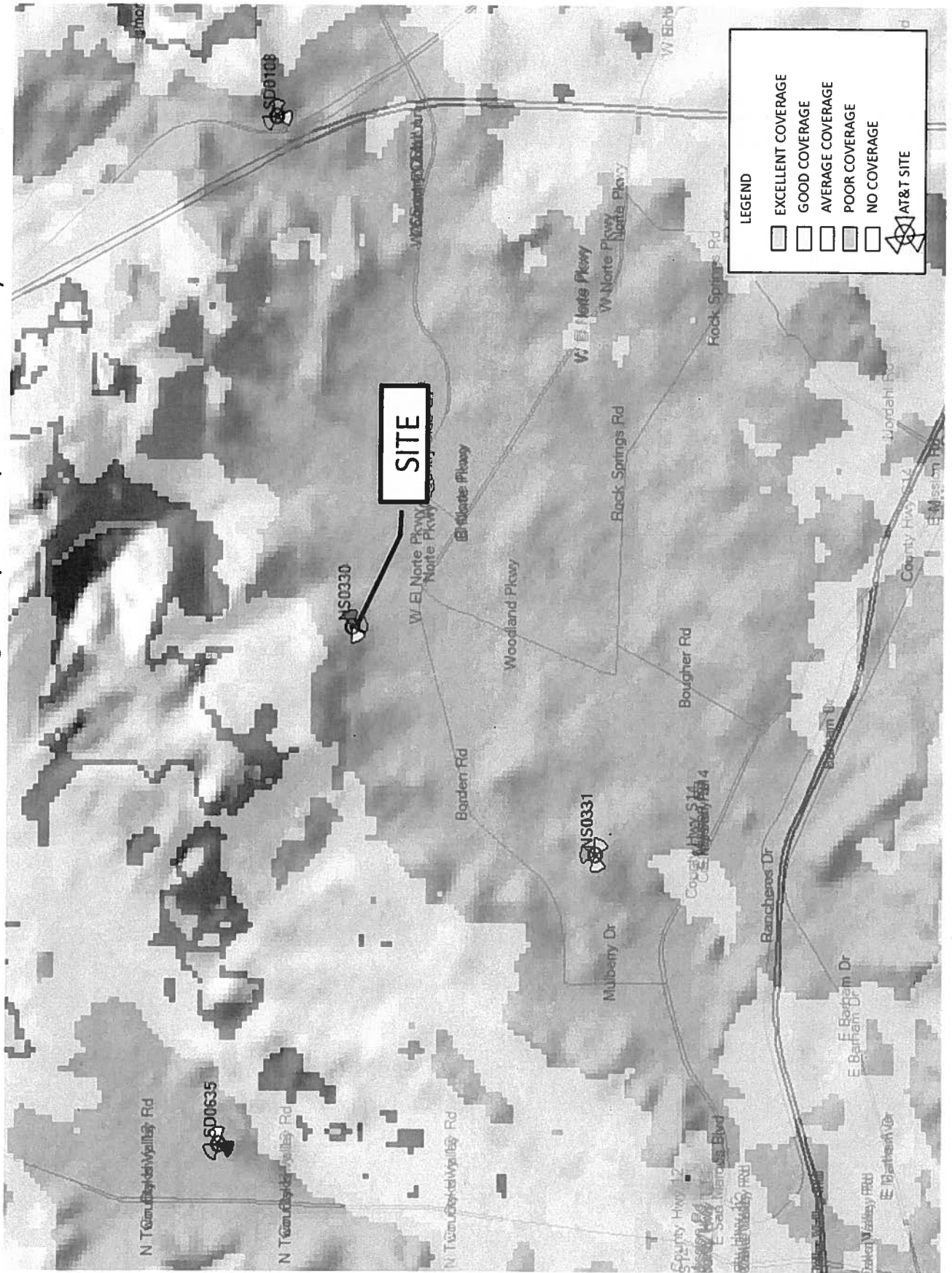


AT&T NS0330 Coverage map with ( 6 ft Antenna)





AT&T NS0330 Coverage map with ( 8 ft Antenna)



# Radio Frequency – Electromagnetic Energy (RF-EME) Compliance Report

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Prepared for:  
AT&T Mobility, LLC  
c/o Black & Veatch Corporation  
9820 Willow Creek Road Suite  
310  
San Diego, CA 92131



Caspr # 3601003051  
USID# 87926  
Site No. NS0330  
Escondido Highlands  
1901-7/8 Woodland Parkway  
Escondido, California 9206  
San Diego County  
33.160750; -117.131494 NAD83  
Site Type: monotree

EBI Project No. 62111837  
November 29, 2011

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## APPENDICES

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## EXECUTIVE SUMMARY

### Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) monitoring and modeling for AT&T Site NS0330 located at 1901-7/8 Woodland Parkway in Escondido, California to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Section 2.0 of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME monitoring and modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

EBI field personnel visited this site on September 26, 2011. This report contains a detailed summary of the RF EME analysis for the site, including the following:

- Antenna Inventory
- Site Plan with antenna locations
- Antenna inventory with relevant parameters for theoretical modeling
- Graphical representation of theoretical MPE fields based on modeling
- Graphical representation of recommended signage and/or barriers
- Site Photographs
- Graphic representation of on-site monitoring results

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

### Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

As presented in the sections below, based on worst-case predictive modeling, there are no modeled areas on any accessible ground-level walking/working surface related to the AT&T proposed antennas that exceed the FCC's occupational or general public exposure limits at this site.

Additionally, based on the FCC criteria, there are no measured areas on any accessible ground walking/working surface related to the existing site conditions that exceed the FCC's occupational or general public exposure limits at this site.

### AT&T Recommended Signage/Compliance Plan

AT&T's RF Exposure Policy guidance, dated October 4, 2010, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Site compliance recommendations have been developed based upon protocols presented in AT&T's RF Exposure Policy guidance document, dated October 4, 2010, additional guidance provided by AT&T, EBI's understanding of FCC and OSHA requirements, and common industry practice. Barrier locations have been identified (when required) based on guidance presented in AT&T's RF Exposure Policy guidance document, dated October 4, 2010. The following signage is recommended at this site:

- Green INFO I sign posted at the base of the monotree.
- Yellow CAUTION sign posted at the base of the monotree.

The signage proposed for installation at this site complies with AT&T's RF Exposure Policy and therefore complies with FCC and OSHA requirements. Barriers are not recommended on this site. More detailed information concerning site compliance recommendations is presented in Section 5.0 and Appendix E of this report.

## 1.0 SITE DESCRIPTION

This project involves the proposed installation of up to twelve (12) wireless telecommunication antennas on a monotree in Escondido, California. There are three sectors (A, B and C) proposed at the site. The current plans for the site include four (4) proposed antennas per sector, a total of twelve (12) antennas to be installed on the site. To be conservative, modeling was performed assuming a full build-out of four (4) antennas per sector. In each sector, there is assumed to be one UMTS antenna in two bands of the 850 MHz and two bands of the 1900 MHz frequencies; two LTE antennas in each sector transmitting in the 700 MHz frequency. The remaining antenna is assumed to be transmitting in the GSM 850 MHz and GSM 1900 MHz frequencies. The Sector A antennas will be oriented 80° from true north. The Sector B antennas will be oriented 170° from true north. The Sector C antennas will be oriented 240° from true north. The bottoms of the antennas will be 27 feet above ground level. Appendix B presents an antenna inventory for the site.

Access to this site is accomplished by approaching the unsecured monotree at ground level. However, the monotree is located within the larger secured water tank compound. The water tank compound access gate is locked and, as such, the general public is unable to access the monotree. In addition, workers must be elevated to antenna level to access them, so these antennas are not accessible to the general public.

EBI conducted a site visit on September 26, 2011. At the time of the site visit, T-Mobile, Sprint, Nextel and Cricket were present on nearby towers and poles. Measurements were taken at the ground to record existing RF-EME levels resulting from these antennas prior to the installation of AT&T's equipment. These other carriers were also included in the modeling analysis using elevations collected on site and assumed parameters. However, an omni antenna associated with an unknown carrier on the water tank approximately 50 feet north of the AT&T monotree was not included in the modeling analysis because the antenna attributes could not be identified during the site survey. Appendix F contains site photos taken on September 26, 2011 during the on-site survey. Appendix G presents a site plan indicating monitoring and antenna locations. Appendix H contains climate and site observations recorded during the site visit.

## 2.0 FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

**Occupational/controlled exposure limits** apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see

below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

**General public/uncontrolled exposure limits** apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

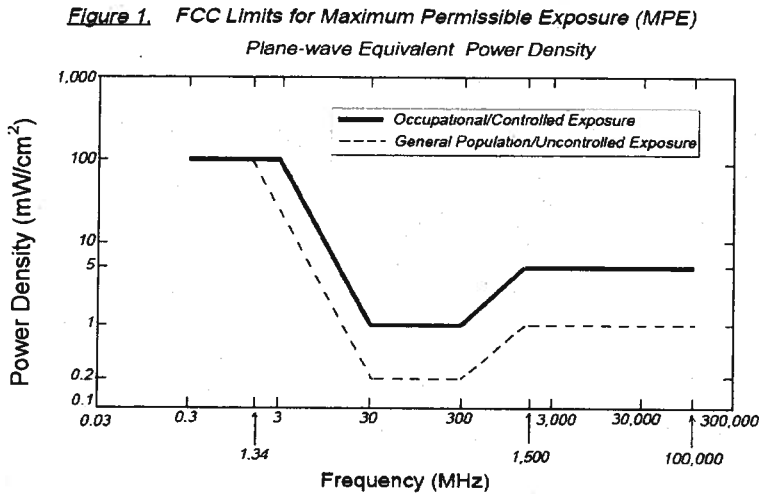
Table I and Figure I (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm<sup>2</sup>). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm<sup>2</sup>) and an uncontrolled MPE of 1 mW/cm<sup>2</sup> for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 850 MHz, the FCC's occupational MPE is 2.83 mW/cm<sup>2</sup> and an uncontrolled MPE of 0.57 mW/cm<sup>2</sup>. For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE is 2.33 mW/cm<sup>2</sup> and an uncontrolled MPE of 0.47 mW/cm<sup>2</sup>. These limits are considered protective of these populations.

| Table I: Limits for Maximum Permissible Exposure (MPE) |                                   |                                   |   |   |
|--|-----------------------------------|-----------------------------------|---|---|
| (A) Limits for Occupational/Controlled Exposure        |                                   |                                   |   |   |
| Frequency Range (MHz)                                  | Electric Field Strength (E) (V/m) | Magnetic Field Strength (H) (A/m) | Power Density (S) (mW/cm <sup>2</sup> ) | Averaging Time [E] <sup>2</sup> , [H] <sup>2</sup> , or S (minutes) |
| 0.3-3.0  | 614                               | 1.63                              | (100)*                                  | 6   |
| 3.0-30   | 1842/f                            | 4.89/f                            | (900/f <sup>2</sup> )*                  | 6   |
| 30-300   | 61.4                              | 0.163                             | 1.0                                     | 6   |
| 300-1,500  | --                                | --                                | f/300                                   | 6   |
| 1,500-100,000  | --                                | --                                | 5                                       | 6   |
| (B) Limits for General Public/Uncontrolled Exposure    |                                   |                                   |   |   |
| Frequency Range (MHz)                                  | Electric Field Strength (E) (V/m) | Magnetic Field Strength (H) (A/m) | Power Density (S) (mW/cm <sup>2</sup> ) | Averaging Time [E] <sup>2</sup> , [H] <sup>2</sup> , or S (minutes) |
| 0.3-1.34   | 614                               | 1.63                              | (100)*                                  | 30  |
| 1.34-30  | 824/f                             | 2.19/f                            | (180/f <sup>2</sup> )*                  | 30  |
| 30-300   | 27.5                              | 0.073                             | 0.2                                     | 30  |
| 300-1,500  | --                                | --                                | f/1,500                                 | 30  |
| 1,500-100,000  | --                                | --                                | 1.0                                     | 30  |

f = Frequency in (MHz)

\* Plane-wave equivalent power density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

| Personal Wireless Service    | Approximate Frequency | Occupational MPE        | Public MPE              |
|------------------------------|-----------------------|-------------------------|-------------------------|
| Personal Communication (PCS) | 1,950 MHz             | 5.00 mW/cm <sup>2</sup> | 1.00 mW/cm <sup>2</sup> |
| Cellular Telephone           | 870 MHz               | 2.90 mW/cm <sup>2</sup> | 0.58 mW/cm <sup>2</sup> |
| Specialized Mobile Radio     | 855 MHz               | 2.85 mW/cm <sup>2</sup> | 0.57 mW/cm <sup>2</sup> |
| Most Restrictive Freq. Range | 30-300 MHz            | 1.00 mW/cm <sup>2</sup> | 0.20 mW/cm <sup>2</sup> |

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

### 3.0 AT&T RF EXPOSURE POLICY REQUIREMENTS

AT&T's RF Exposure Policy guidance, dated October 4, 2010, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and



3. All sites must have any necessary signage and barriers installed.

Pursuant to this guidance, an RF site survey has been completed for this site. The results of the site survey are summarized below in Section 6.0 and in Appendices B, F, G, and H. Worst-case predictive modeling was also performed for the site. This modeling is described below in Section 4.0. Lastly, based on the modeling and survey data, EBI has produced a Compliance Plan for this site that outlines the recommended signage and barriers. The recommended Compliance Plan for this site is described in Section 5.0.

#### 4.0 WORST-CASE PREDICTIVE MODELING

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofView® software to estimate the worst-case power density at the site ground-level resulting from operation of the antennas. RoofView® is a widely-used predictive modeling program that has been developed by Richard Tell Associates to predict both near field and far field RF power density values for roof-top and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

For this report, EBI utilized antenna and power data provided by AT&T, and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65. The assumptions used in the modeling are based upon information provided by AT&T, data collected during the site survey and information gathered from other sources. T-Mobile, Sprint, Nextel and Cricket antennas were present on nearby towers and poles. Information about these antennas was included in the modeling analysis.

Based on worst-case predictive modeling, there are no modeled areas on any accessible ground-level walking/working surface related to the proposed AT&T antennas that exceed the FCC's occupational or general public exposure limits at this site.

At the nearest walking/working surfaces to the AT&T antennas, the predicted maximum power density generated by the AT&T antennas is approximately 4.20 percent of the FCC's general public limit (0.84 percent of the FCC's occupational limit). The predicted composite exposure level from all carriers on this site is approximately 62.00 percent of the FCC's general public limit (12.40 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna.

There are no modeled areas on the ground that exceed the FCC's limits for general public or occupational exposure in front of the other carrier antennas.

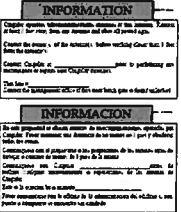

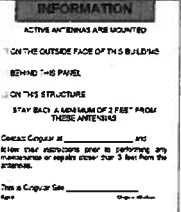


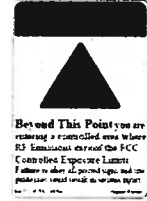

The inputs used in the modeling are summarized in the RoofView® export file presented in Appendix C. A graphical representation of the RoofView® modeling results is presented in Appendix D. It should be noted that RoofView is not suitable for modeling microwave dish antennas; however, these units are designed for point-to-point operations at the elevations of the installed equipment rather than ground level coverage. Based on AT&T's RF Exposure Policy guidance, dated October 4, 2010, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. All microwaves on site, if any, are considered compliant and were not included in the modeling analysis.

**RECOMMENDED SIGNAGE/COMPLIANCE PLAN**

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.

| Informational Signs   |               | Alerting Signs   |                |
|---|---------------|--|----------------|
|    | <b>INFO 1</b> |    | <b>NOTICE</b>  |
|   | <b>INFO 2</b> |   | <b>CAUTION</b> |
|  | <b>INFO 3</b> |  | <b>WARNING</b> |
|  | <b>INFO 4</b> |  |                |

Based upon protocols presented in AT&T's RF Exposure Policy guidance document, dated October 4, 2010, and additional guidance provided by AT&T, the following signage is recommended and has been installed on the site:

**Recommended Signage:**

- Green INFO 1 sign posted at the base of the monotree.
- Yellow CAUTION sign posted at the base of the monotree.

**Signage Installed at the Site:**

- Green INFO 1 sign posted at the base of the monotree.
- Yellow CAUTION sign posted at the base of the monotree.

No barriers are required for this site. Barriers may consist of rope, chain, or fencing. Painted stripes should only be used as a last resort. The signage and any barriers are graphically represented in the Signage Plan presented in Appendix E.

## **5.0 SITE AND VICINITY SURVEY**

EBI performed a ground level RF-EME survey on September 26, 2011. The antenna inventory (based upon the site survey) and site photos taken from ground level are presented in Appendices F and G, respectively.

Monitoring was performed using a Narda NBM-550 Electromagnetic Radiation Survey Meter, Serial #B-1124 with a Narda EA5091 Shaped Probe with a frequency range of 300kHz-50 GHz. The meter was last calibrated on September 3, 2011. This meter was programmed to measure the total power density for all electromagnetic radiation within the 300kHz-50GHz frequency range and report the power density as a percent of the FCC's controlled MPE. During this survey, no spatially averaged readings above 0.8535% of the FCC's occupational MPE (4.2675% of the general public MPE) were encountered on any ground surface. A site plan depicting monitoring locations and measurements of power density can be found in Appendix G. Appendix H contains notes from the site survey.

At the time of the site survey, it was noted that there was a green "INFO 1" sign and a yellow "Notice to Workers" sign located on the base of the monotree and on the AT&T equipment enclosure indicating the presence of RF emitting equipment at the site. As described in Section 5.0, additional signage is recommended in order to comply with AT&T guidance.

## **6.0 SUMMARY AND CONCLUSIONS**

EBI has prepared this Radiofrequency Emissions Compliance Report for the proposed AT&T telecommunications equipment at the site located at 1901-7/8 Woodland Parkway in Escondido, California.

EBI has conducted theoretical modeling to estimate the worst-case power density from AT&T antennas and other carriers' antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements, as well as AT&T's corporate RF safety policies. As presented in the preceding sections, based on worst-case predictive modeling, there are no modeled exposures on any accessible ground-level walking/working surface related to proposed equipment in the area that exceed the FCC's occupational and general public exposure limits at this site. As such, the proposed AT&T project is in compliance with FCC rules and regulations.

Additionally, based on the FCC criteria, there are no measured areas on any accessible ground-level walking/working surface related to the existing site conditions that exceed the FCC's occupational and general public exposure limits at this site.

Signage is recommended and has been installed at the site as presented in Section 5.0 and Appendix E. Posting of the signage brings the site into compliance with FCC rules and regulations and AT&T's corporate RF safety policies.

## **7.0 LIMITATIONS**

This report was prepared for the use of AT&T Mobility, LLC. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information collected during the site survey and provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

## **Appendix A**

### **Certifications**

## Field Personnel Certification

I, Don Perez, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am familiar with the FCC rules and regulations as well as OSHA regulations both in general and as they apply to RF-EME exposure.
- I have been trained in the proper use of the RF-EME measurement equipment, and have successfully completed EBI training in the policies and procedures for site survey protocols.
- All information collected during the site survey and contained in this report is true and accurate to the best of my knowledge and based on the data gathered.



---

## Preparer Certification

I, Jos Schorr, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am familiar with the FCC rules and regulations as well as OSHA regulations both in general and as they apply to RF-EME exposure.
- I have been trained in on the procedures outlined in AT&T's RF Exposure Policy guidance (dated 10/04/10) and on RF-EME modeling using RoofView® modeling software.
- I have reviewed the data collected during the site survey and provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.



---

## **Appendix B**

### **Antenna Inventory**



| Antenna Number | Operator | Antenna Type | TX Freq (MHz) | ERP (Watts) | Gain (dBd) | Model             | Azimuth (deg.) | Length (ft) | Horizontal Beamwidth (Deg.) | X  | Y  | Z  |
|----------------|----------|--------------|---------------|-------------|------------|-------------------|----------------|-------------|-----------------------------|----|----|----|
| ATT A1         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 80             | 8           | 68                          | 56 | 63 | 27 |
| ATT A2         | AT&T     | Panel        | GSM 850       | 125         | 14.65      | Kathrein 80010766 | 80             | 8           | 65                          | 57 | 61 | 27 |
| ATT A2         | AT&T     | Panel        | GSM 1900      | 250         | 16.35      | Kathrein 80010766 | 80             | 8           | 62                          | 57 | 61 | 27 |
| ATT A3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 80             | 8           | 65                          | 58 | 59 | 27 |
| ATT A3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 80             | 8           | 62                          | 58 | 59 | 27 |
| ATT A3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 80             | 8           | 65                          | 58 | 59 | 27 |
| ATT A3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 80             | 8           | 62                          | 58 | 59 | 27 |
| ATT A4         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 80             | 8           | 68                          | 59 | 57 | 27 |
| ATT B1         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 170            | 8           | 68                          | 57 | 54 | 27 |
| ATT B2         | AT&T     | Panel        | GSM 850       | 250         | 14.65      | Kathrein 80010766 | 170            | 8           | 65                          | 55 | 53 | 27 |
| ATT B2         | AT&T     | Panel        | GSM 1900      | 375         | 16.35      | Kathrein 80010766 | 170            | 8           | 62                          | 55 | 53 | 27 |
| ATT B3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 170            | 8           | 65                          | 53 | 52 | 27 |
| ATT B3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 170            | 8           | 62                          | 53 | 52 | 27 |
| ATT B3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 170            | 8           | 65                          | 53 | 52 | 27 |
| ATT B3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 170            | 8           | 62                          | 53 | 52 | 27 |
| ATT B4         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 170            | 8           | 68                          | 51 | 51 | 27 |
| ATT C1         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 240            | 8           | 68                          | 48 | 53 | 27 |
| ATT C2         | AT&T     | Panel        | GSM 850       | 250         | 14.65      | Kathrein 80010766 | 240            | 8           | 65                          | 47 | 55 | 27 |
| ATT C2         | AT&T     | Panel        | GSM 1900      | 250         | 16.35      | Kathrein 80010766 | 240            | 8           | 62                          | 47 | 55 | 27 |

| Antenna Number | Operator | Antenna Type | TX Freq (MHz) | ERP (Watts) | Gain (dBd) | Model             | Azimuth (deg.) | Length (ft) | Horizontal Beamwidth (Deg.) | X   | Y   | Z    |
|----------------|----------|--------------|---------------|-------------|------------|-------------------|----------------|-------------|-----------------------------|-----|-----|------|
| ATT C3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 240            | 8           | 65                          | 46  | 57  | 27   |
| ATT C3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 240            | 8           | 62                          | 46  | 57  | 27   |
| ATT C3         | AT&T     | Panel        | UMTS 850      | 250         | 14.65      | Kathrein 80010766 | 240            | 8           | 65                          | 46  | 57  | 27   |
| ATT C3         | AT&T     | Panel        | UMTS 1900     | 250         | 16.35      | Kathrein 80010766 | 240            | 8           | 62                          | 46  | 57  | 27   |
| ATT C4         | AT&T     | Panel        | LTE 700       | 250         | 14.25      | Kathrein 80010766 | 240            | 8           | 68                          | 45  | 60  | 27   |
| CRK A1         | Cricket  | Panel        | 1900          | 243         | 16         | Unknown           | 70             | 6           | 65                          | 16  | 28  | 28.5 |
| CRK B1         | Cricket  | Panel        | 1900          | 243         | 16         | Unknown           | 160            | 6           | 65                          | 14  | 24  | 28.5 |
| CRK C1         | Cricket  | Panel        | 1900          | 243         | 16         | Unknown           | 250            | 6           | 65                          | 12  | 26  | 28.5 |
| NXT A1         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 120            | 4           | 90                          | 135 | 68  | 7    |
| NXT A2         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 120            | 4           | 90                          | 132 | 64  | 7    |
| NXT A3         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 120            | 4           | 90                          | 129 | 60  | 7    |
| NXT B1         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 230            | 4           | 90                          | 106 | 55  | 7    |
| NXT B2         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 230            | 4           | 90                          | 101 | 56  | 7    |
| NXT B3         | Nextel   | Panel        | 850           | 242         | 12         | Unknown           | 230            | 4           | 90                          | 96  | 57  | 7    |
| TMO A1         | T-Mobile | Panel        | 1900          | 81          | 16         | Unknown           | 70             | 5           | 65                          | 151 | 140 | 28.5 |
| TMO A2         | T-Mobile | Panel        | 1900          | 81          | 16         | Unknown           | 70             | 5           | 65                          | 153 | 135 | 28.5 |
| TMO A3         | T-Mobile | Panel        | 1900          | 81          | 16         | Unknown           | 70             | 5           | 65                          | 155 | 130 | 28.5 |
| TMO B1         | T-Mobile | Panel        | 1900          | 81          | 16         | Unknown           | 160            | 5           | 65                          | 157 | 124 | 28.5 |
| TMO B2         | T-Mobile | Panel        | 1900          | 81          | 16         | Unknown           | 160            | 5           | 65                          | 152 | 121 | 28.5 |

| Antenna Number | Operator  | Antenna Type | TX Freq (MHz) | ERP (Watts) | Gain (dBd) | Model   | Azimuth (deg.) | Length (ft) | Horizontal Beamwidth (Deg.) | X   | Y   | Z    |
|----------------|-----------|--------------|---------------|-------------|------------|---------|----------------|-------------|-----------------------------|-----|-----|------|
| TMO B3         | T-Mobile  | Panel        | 1900          | 81          | 16         | Unknown | 160            | 5           | 65                          | 147 | 118 | 28.5 |
| TMO C1         | T-Mobile  | Panel        | 1900          | 81          | 16         | Unknown | 250            | 5           | 65                          | 141 | 122 | 28.5 |
| TMO C2         | T-Mobile  | Panel        | 1900          | 81          | 16         | Unknown | 250            | 5           | 65                          | 140 | 127 | 28.5 |
| TMO C3         | T-Mobile  | Panel        | 1900          | 81          | 16         | Unknown | 250            | 5           | 65                          | 139 | 133 | 28.5 |
| SPT A1         | Sprint    | Panel        | 1900          | 122         | 16         | Unknown | 120            | 4.5         | 65                          | 194 | 199 | 5.5  |
| SPT A2         | Sprint    | Panel        | 1900          | 122         | 16         | Unknown | 120            | 4.5         | 65                          | 174 | 195 | 5.5  |
| SPT B1         | Sprint    | Panel        | 1900          | 122         | 16         | Unknown | 230            | 4.5         | 65                          | 126 | 166 | 5.5  |
| SPT B2         | Sprint    | Panel        | 1900          | 122         | 16         | Unknown | 230            | 4.5         | 65                          | 104 | 168 | 5.5  |
| UNK3 A1        | Unknown 3 | Omni         | Unknown       | Unknown     | Unknown    | Unknown | Unknown        | Unknown     | Unknown                     | NA  | NA  | Unk. |

1. Note that EBI uses an assumed set of antenna specifications and powers for unknown and other carrier antennas for modeling purposes.
2. Note there are only 4 A/T antennas per sector at this site. For clarity, the different frequencies for each antenna are entered on different lines.



## **Appendix C**





### **Roofview® Export File**



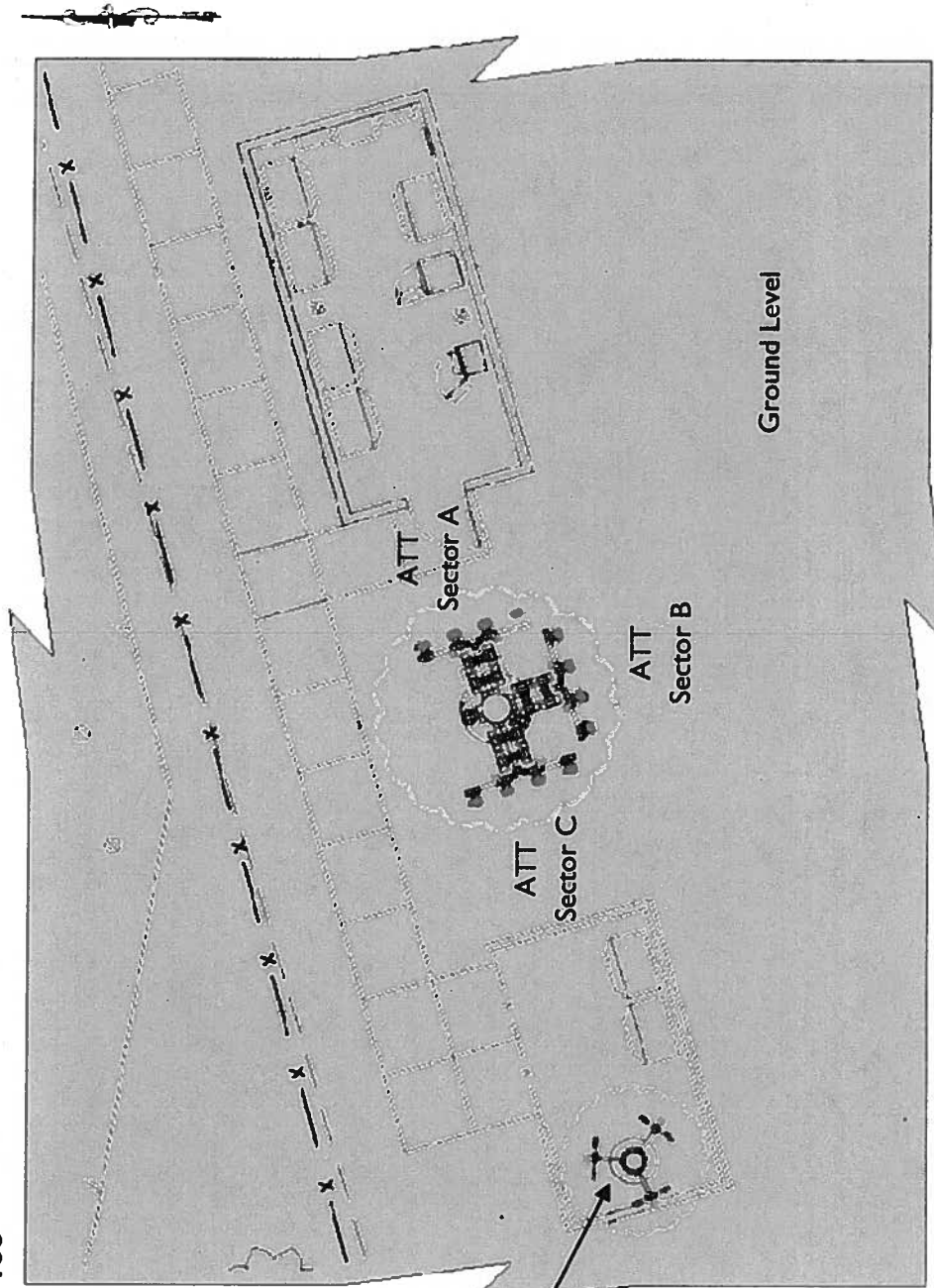


**Appendix D**  
**Roofview ® Graphics**

**% of FCC Public Exposure Limit**



-  Exposure Level  $\geq 5,000$
-  Exposure Level  $\leq 5000$
-  Exposure Level  $\leq 500$
-  Exposure Level  $\leq 100$

**\*Ground Level Simulation**



Cricket Tower

For clarity, most of the other carrier antennas are not shown since they are outside of the immediate vicinity of the AT&T tower.

-  AT&T Antennas
-  Other Carrier Antennas

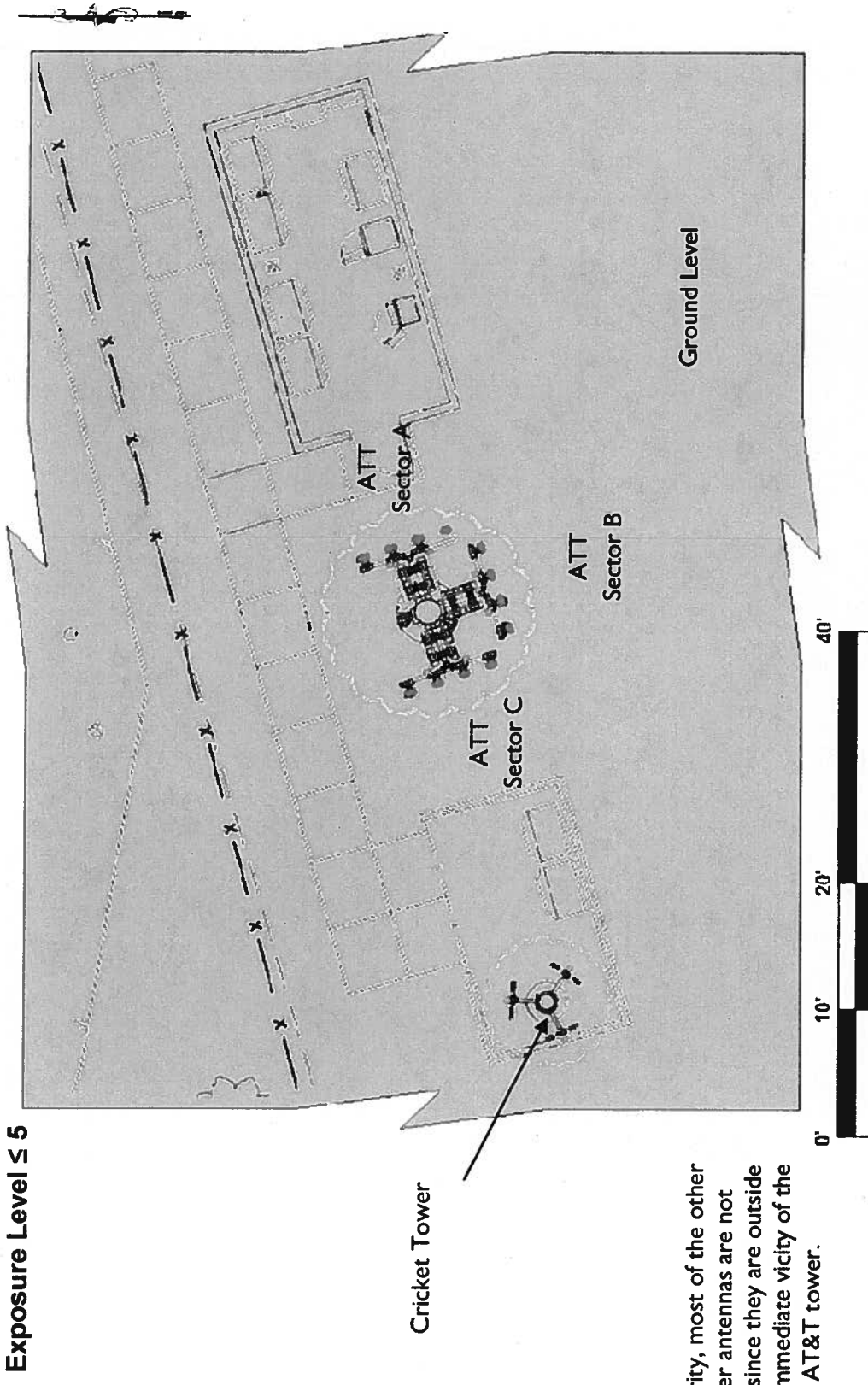
**Roofview: Composite Exposure Levels**  
 Facility Operator: AT&T Mobility  
 Site Name: Escondido Highlands  
 AT&T Site Number: NS0330  
 USID Number: 87926  
 Report Date: 11-29-11





**% of FCC Public Exposure Limit**

- Exposure Level >5
- Exposure Level ≤ 5



For clarity, most of the other carrier antennas are not shown since they are outside of the immediate vicinity of the AT&T tower.

Note that the areas shown in purple, where AT&T antennas contribute more than 5% of the FCC's general exposure MPE limit, do not overlap the areas in front of other carrier antennas that exceed the FCC's general exposure MPE limit (as shown in Figure 1). Under FCC regulations, AT&T is therefore not responsible for any predicted exceedances of these other carrier antennas.

- AT&T Antennas
- Other Carrier Antennas

**Figure 2.**

**Roofview: AT&T Exposure Levels**

Facility Operator: AT&T Mobility

Site Name: Escondido Highlands

AT&T Site Number: NS0330



USID Number: 87926

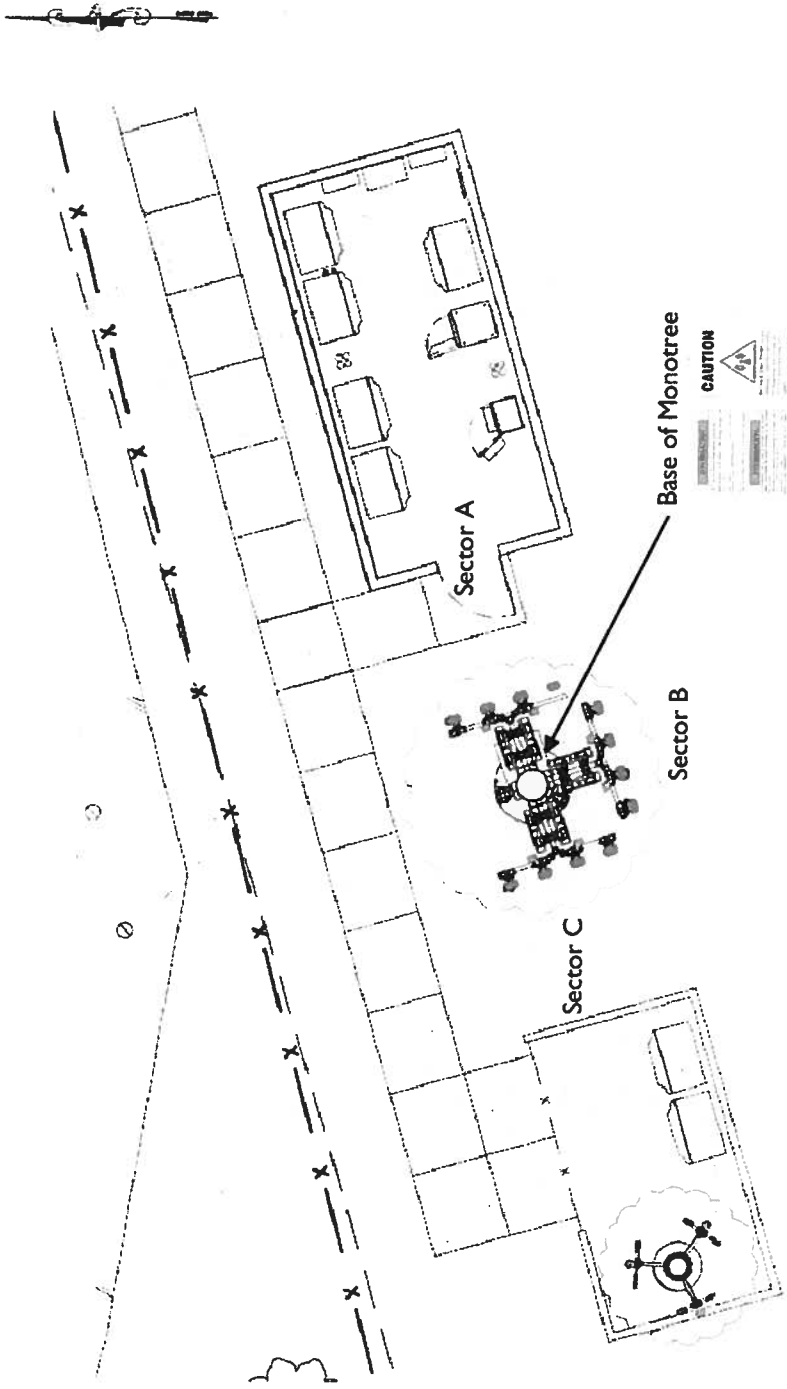
Report Date: 11-29-11










## **Appendix E**

### **Compliance/Signage Plan**

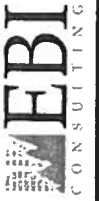
-  AT&T Antennas
-  Other Carrier Antennas



**Sign Identification Legend**

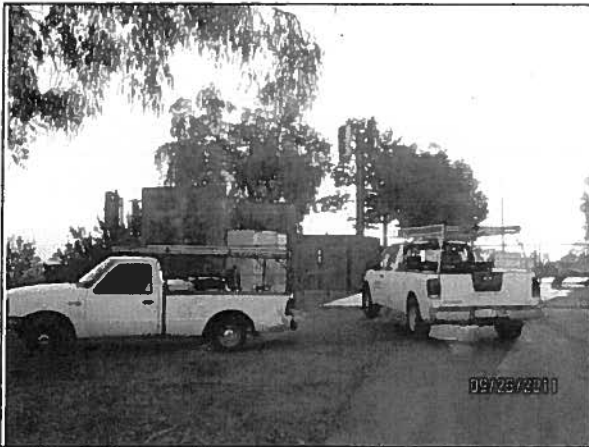
|   |                                   |
|---|-----------------------------------|
|  | Denotes AT&T Informational Sign 1 |
|  | Denotes AT&T Informational Sign 2 |
|  | Denotes AT&T Informational Sign 3 |
|  | Denotes AT&T Informational Sign 4 |
|  | Denotes AT&T NOTICE Sign          |
|  | Denotes AT&T CAUTION Sign         |
|  | Denotes AT&T WARNING Sign         |

**Compliance/Signage Plan**  
 Facility Operator: AT&T Mobility  
 Site Name: Escondido Highlands  
 AT&T Site Number: NS0330  
 USID Number: 87926  
 Report Date: 11-29-11

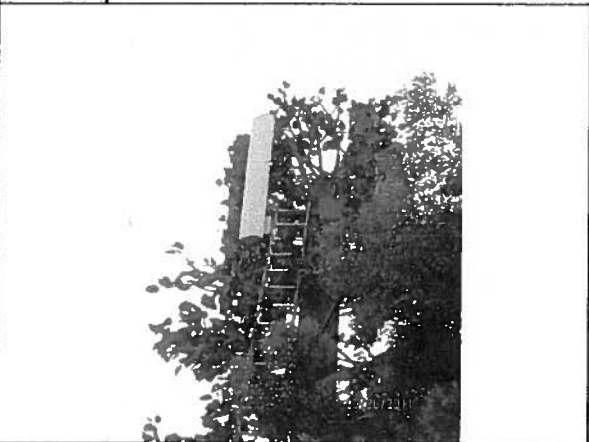


## **Appendix F**

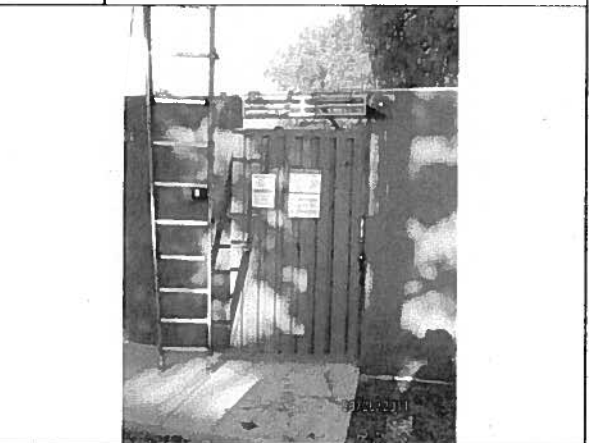
### **Site Photographs**



1. View west-southwest; overview of Sprint and AT&T facilities.



2. View west-southwest and up toward AT&T antennas.



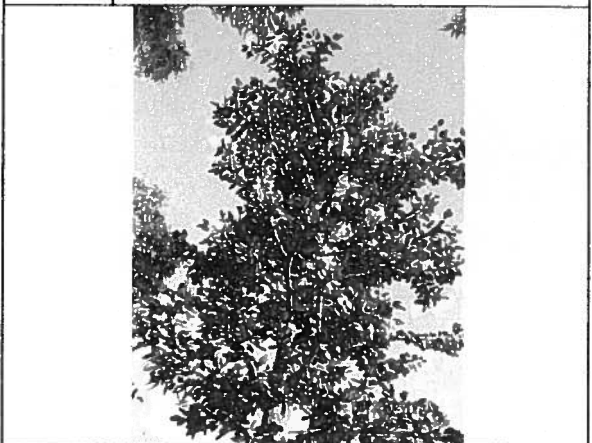
3. AT&T equipment shelter door.



4. Detail of signage at base of AT&T tower.



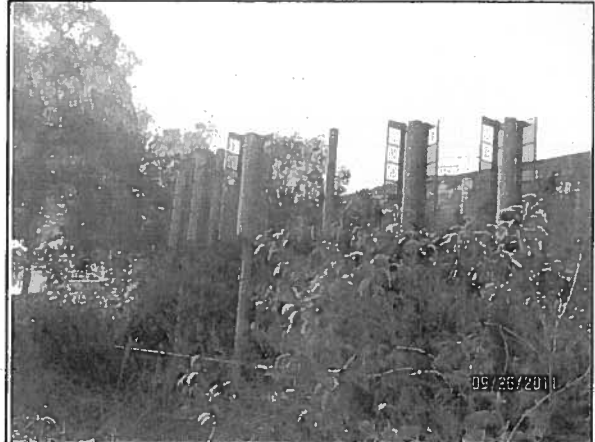
5. View east toward Cricket tower located to the west of the AT&T tower.



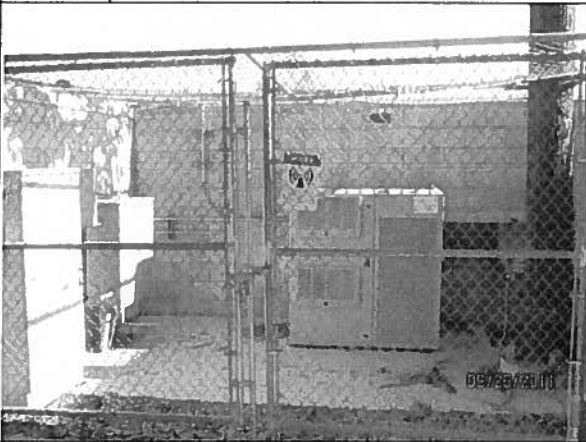
6. View south and up toward antennas on Cricket tower located to the west of the AT&T tower.



7. View south and up toward antennas on Cricket tower located to the west of the AT&T tower.



10. View west-northwest toward Nextel sector A and B antennas.



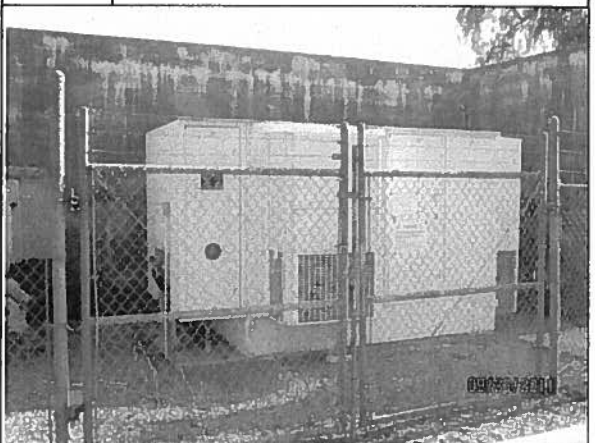
8. Unknown carrier equipment located west to the AT&T tower.



11. Detail of signage near Nextel antennas.



9. View east toward Nextel sector B antennas.



12. Nextel equipment enclosure.



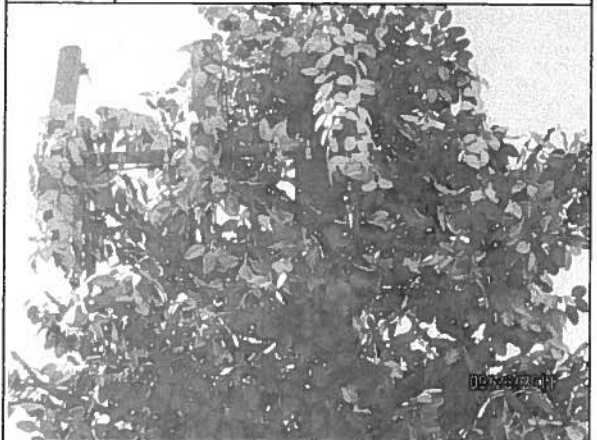
13. Detail of signage on Nextel enclosure.



16. Detail of signage on T-Mobile equipment enclosure.



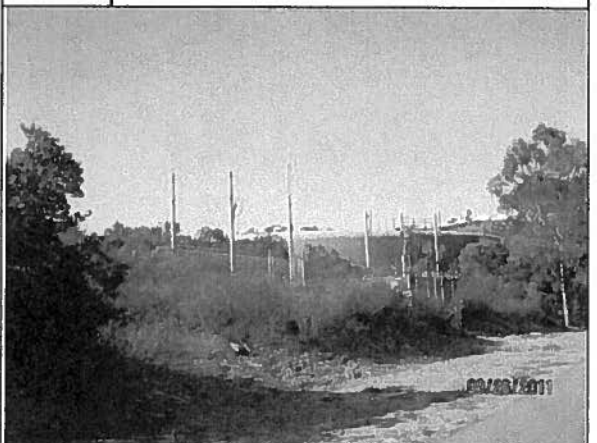
14. View north toward T-Mobile tower.



17. View north and up toward T-Mobile antennas.

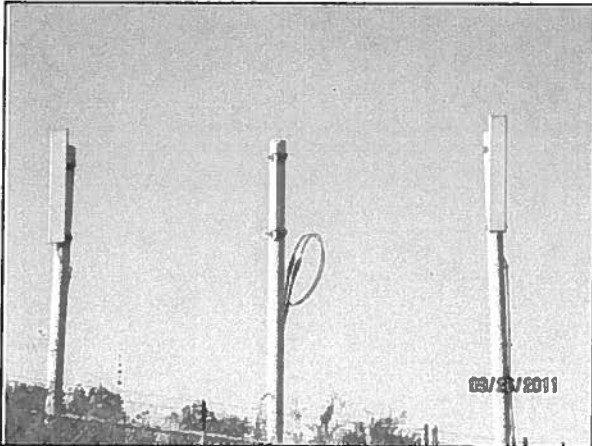


15. View north-northwest toward T-Mobile equipment enclosure.

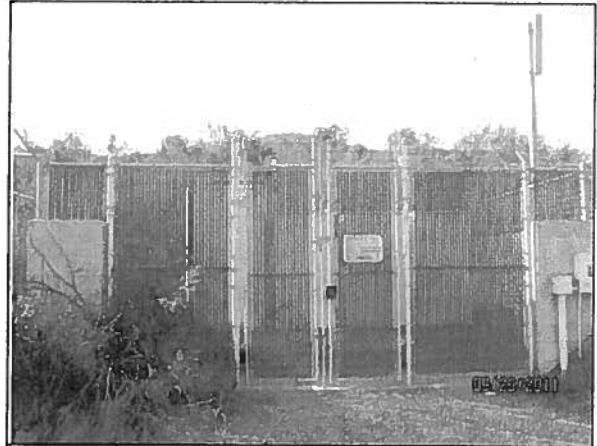


18. View north toward Sprint antennas.

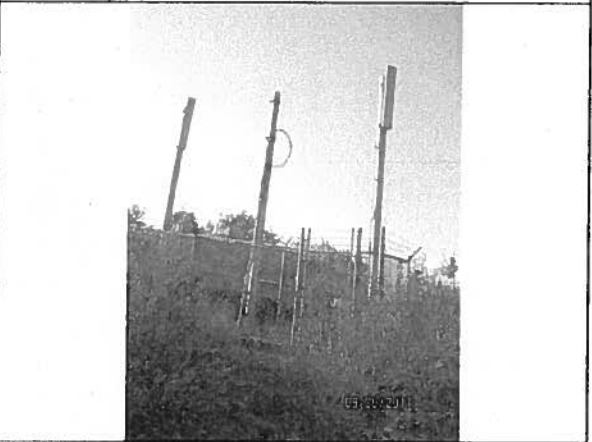




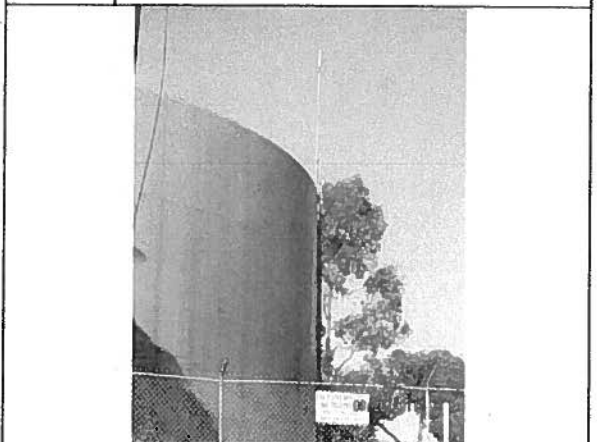
19. View north toward Sprint sector B antennas.



22. View north toward Sprint equipment enclosure.



20. View northwest toward Sprint sector A antennas.



23. View northeast toward Omni antenna mounted to water tank.

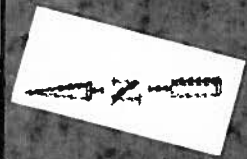


21. Detail of signage on Sprint sector A antennas.



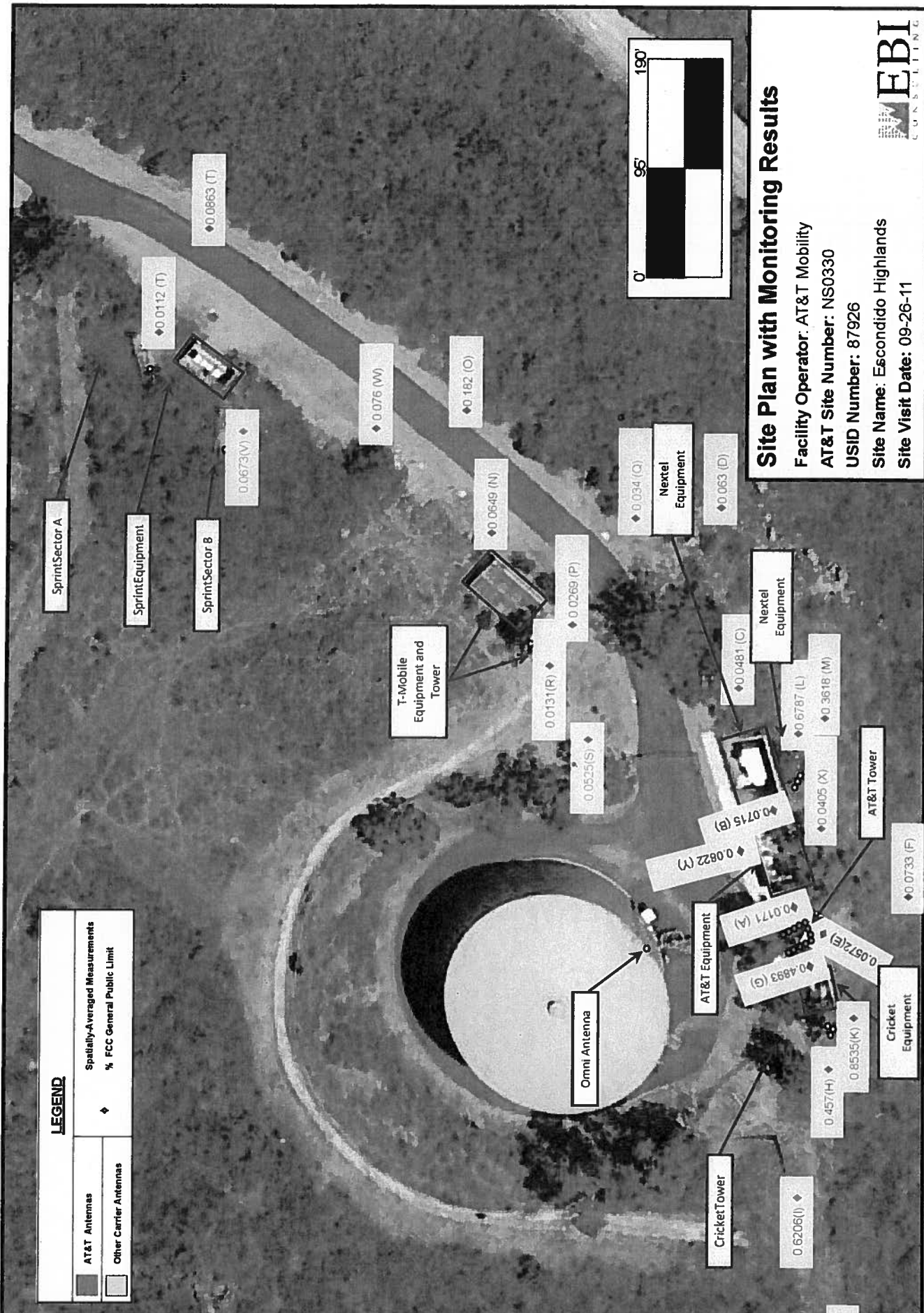
## **Appendix G**

### **Site Plan with Monitoring Locations**



**LEGEND**

|   |                        |   |                                 |
|---|------------------------|---|---------------------------------|
| ■ | AT&T Antennas          | ◆ | Spatially-Averaged Measurements |
| □ | Other Carrier Antennas | ◆ | % FCC General Public Limit      |



**Site Plan with Monitoring Results**

Facility Operator: AT&T Mobility  
 AT&T Site Number: NS0330  
 USID Number: 87926  
 Site Name: Escondido Highlands  
 Site Visit Date: 09-26-11



## **Appendix H**

### **Site Survey Data**

|               |                  |                 |           |
|---------------|------------------|-----------------|-----------|
| Surveyor Name | <b>Don Perez</b> | Site Visit Date | 09- 26-11 |
|---------------|------------------|-----------------|-----------|

| <b>Site Information</b>  |  |
|--|--|
| Escondido Highlands<br>1901-7/8 Woodland Parkway<br>Escondido, California 9206 | San Diego County<br><br><b>Site Coordinates (NAD83):</b><br>33.160750; -117.131494 |

| <b>MONITOR INFORMATION</b>        |          | <b>PROBE INFORMATION</b>          |          |
|-----------------------------------|----------|-----------------------------------|----------|
| Monitor Model #                   | NBM-550  | Probe Model #                     | EA 5091  |
| Monitor Serial #                  | B-1124   | Probe Serial #                    | 01077    |
| Calibration Date                  | 9/3/2011 | Calibration Date                  | 3/2/2010 |
| Next Recommended Calibration Date | 9/3/2012 | Next Recommended Calibration Date | 3/2/2012 |

| <b>CLIMATE INFORMATION</b>                                     |             |
|--|-------------|
| Temperature (°F)   | 80          |
| Sunny/Overcast/Cloudy  | Sunny       |
| Windy/Mild Breeze/No Wind                                      | Mild Breeze |
| Rainy/Drizzle/Foggy/Snowy                                      | None        |
| Other Noteworthy weather factors that might influence readings | N/A         |

| <b>ACCESS INFORMATION</b>  |   |
|--|---|
| Type of facility:  | Tower within a water tank compound            |
| Contact Information:   | Hector Manmano. AT&T Mobility, HM7772@att.com |
| Property Owner and Contact Number  | Not available                                 |
| M-RFSC Name  | N/A   |
| Who manages Access (e.g. security, landlord, no one)                             | No one  |
| How is access managed? (locks, sign-in, etc)                                     | Locks   |
| Ease of access, in general (e.g. ease of breaching any access physical controls) | Difficult                                     |