



To: San Francisco Board of Supervisors
From: Monchamp Meldrum LLP
Date: December 3, 2025
RE: File No. 251098 – Appeal of Conditional Use Authorization Approval
Proposed 350 Amber Drive Project (Case No. 2024-0004318CUA)

Our firm represents the applicant, AT&T Wireless (AT&T), in relation to the appeal by the Diamond Heights Community Association (DHCA) of the Conditional Use Authorization (CUA) Approval for the above-referenced project at 350 Amber Drive in San Francisco (Project). AT&T's opposition to the CUA appeal is set out below.

I. INTRODUCTION

On September 25, 2025, the San Francisco (City) Planning Commission (Commission) approved a CUA and Shadow Findings for construction of an AT&T telecommunications facility at 350 Amber Drive, San Francisco. That approval included the determination that the Project qualified for a CEQA Class 3 Exemption. DHCA appealed the CUA approval and the CEQA Category 3 Exemption to the Board of Supervisors (Board).¹

DHCA challenges the CUA approval based on the following generalized concerns: (1) soil stability in a mapped landslide zone, (2) environmental impacts associated with a monopine, (3) fire hazards, (4) effects to Glen Canyon Park, St. Nicholas Antiochian Orthodox Church, the George Christopher Playground and Noe Valley Preschool, (5) General Plan inconsistency, and (6) zoning and height inconsistencies. DHCA also incorporates other comments raised regarding the Project. As set forth herein, there is substantial evidence supporting the Commission's CUA and Shadow Findings for the Project. DHCA provides only speculation and unsupported hyperbole. The CUA appeal has no merit and should be denied.

II. THE PROJECT

AT&T seeks to install, use, and maintain a new 104-foot wireless telecommunications facility monopole at the rear of the San Francisco Police Academy at 350 Amber Drive. The Project will include twelve (12) new antennas, nine (9) new remote radio units, three (3) tower mounted

¹ AT&T has submitted a separate memorandum in response to DHCA's appeal of the CEQA Exemption Determination. This memorandum only addresses DHCA's CUA appeal. Both DHCA and AT&T have requested a continuance of the scheduled December 9, 2025, hearing. AT&T reserves the right to submit additional documentation supporting the CUA approval and CEQA determination prior to the continued hearing.

DC-9 surge suppressors, one (1) GPS unit mounted on proposed outdoor equipment cabinet, one (1) walk-up cabinet, and one (1) 30kw DC generator with a 150-gallon diesel fuel tank on a concrete pad (see Attachment A).² The ancillary equipment will be surrounded by an 8' chain link fence. In total, the Project will cover a small ground footprint of approximately 550 square feet.

The Project will address an existing service coverage gap in the AT&T wireless network caused by inadequate wireless infrastructure in the area bordered by the intersection of Amber Drive and Turquoise Way, O'Shaughnessy Blvd to the south and west, and Diamond Heights Blvd to the east. This area of poor service coverage includes numerous homes, businesses in the Diamond Heights Shopping Center, well-traveled roads, Glen Canyon Park, St. Nicholas Antiochian Orthodox Church and other nearby locations. The Project will also provide critical service on the FirstNet network, which is a special band of dedicated wireless service for first responders during potential emergencies.

III. APPROVAL OF THE PROJECT COMPORTS WITH FEDERAL LAW

The federal Telecommunications Act of 1996, 47 U.S.C. § 332 (TCA) provides important rights to wireless service providers and establishes key limitations upon state and local zoning authorities when considering applications for permits to construct personal wireless service facilities. The United States Supreme Court has explained that the TCA was enacted in part to prioritize and streamline deployment of wireless technologies on a national basis.³ In enacting the TCA, Congress intended "to provide for a pro-competitive, de-regulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services . . . by opening all telecommunications markets to competition."⁴

Rapid deployment of wireless telecommunications facilities like the instant Project is an important national issue, especially because Americans are increasingly eliminating their traditional landline telephone in favor of wireless devices. Based on a two-decade study, the Center for Disease Control and Prevention (CDC) has determined that more than 91% of California adults, and more than 98% of Californians under age 18, rely exclusively or primarily

² The tank was originally shown as 190-gallons, but the plans were later updated to reflect the current standard 150-gallon diesel fuel tank. Attachment A also removes and replaces the remnant references to the Project as a "monopine." The Project is a monopole.

³ *City of Rancho Palos Verdes v. Abrams*, 544 U.S. 113, 115-16 (2005) ("Congress enacted the Telecommunications Act of 1996 (TCA), 110 Stat. 56, to promote competition and higher quality in American telecommunications services and to 'encourage the rapid deployment of new telecommunications technologies.' Ibid. One of the means by which it sought to accomplish these goals was reduction of the impediments imposed by local governments upon the installation of facilities for wireless communications, such as antenna towers.").

⁴ H.R. Conf. Rep. No. 104-458, at 113 (1996), reprinted in 1996 U.S.C.A.N at 124.

on wireless communications in their homes.⁵ California has also reported to the Federal Communications Commission (FCC) that there were more than 23.3 million wireless calls and 98,065 texts to 911 in 2023 (the most recent year for state level data).⁶

IV. STANDARD OF REVIEW

A. The Board Must Review the Appeal for Substantial Evidence.

The TCA defines the appropriate scope of the City’s overall review of AT&T’s CUA application. Under the TCA, the City’s review must be based on substantial evidence in the written record.⁷ The “substantial evidence” requirement means the City’s decision must be “authorized by applicable local regulations and supported by a reasonable amount of evidence.”⁸ A zoning decision on a wireless facility that is not based on applicable local regulations, is invalid.⁹ Moreover, “[s]ubstantial evidence must be substantiated.”¹⁰ “A local government ‘is not free to prescribe what inferences from the evidence it will accept and reject, but must draw all those inferences that the evidence fairly demands.’”¹¹ In other words, to deny a permit, a local government must have specific reasons that are both consistent with the applicable regulations and supported by substantial evidence in the record.

B. Radio Frequency (RF) Emissions Cannot Be Considered Here.

The TCA specifically precludes local governments from considering any alleged effects of radio frequency emissions in making decisions regarding wireless telecommunications facilities “to the extent such facilities comply with the [Federal Communication] Commission’s regulations concerning such emissions.”¹² Here, there is no dispute that the Project will operate below applicable FCC limits. An engineering analysis of the Project’s RF Emissions was prepared by Hammett & Edison, Consulting Engineers and was certified by a California Registered Professional Engineer. The report confirms the Project will operate well within (and actually far below) all

⁵ See [CDC Wireless Substitution: State-Level Estimates from the National Health Interview Survey](https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202506.pdf), https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_202506.pdf.

⁶ See [FCC's Sixteenth Annual 911 Fee Report](https://www.fcc.gov/sites/default/files/16th-Annual-911FeeReport-2024.pdf), <https://www.fcc.gov/sites/default/files/16th-Annual-911FeeReport-2024.pdf>.

⁷ 47 U.S.C. § 332(c)(7)(B)(iii).

⁸ *MetroPCS, Inc. v. City & Cnty. of San Francisco*, 400 F.3d 715, 725 (9th Cir. 2005).

⁹ *T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987, 993 (9th Cir. 2009), citing *MetroPCS, Inc.*, 400 F.3d at 724.

¹⁰ *T-Mobile Cent., LLC v. Charter Twp. Of W. Bloomfield*, 691 F.3d 794, 800 (6th Cir. 2012).

¹¹ *T-Mobile USA, Inc. v. City of Anacortes*, 2008 U.S. Dist. LEXIS 116764 (W.D.Wa. July 18, 2008), at *8 (*aff'd* 572 F.3d 987), citing *Penobscot Air Servs., Ltd. v. FAA*, 164 F.3d 713, 718 (1st Cir.1999).

¹² 47 U.S.C. § 332(c)(7)(B)(iv).

applicable FCC exposure limits. Given this compliance with FCC standards, AT&T's application cannot be rejected based on concerns about RF emissions.

C. The City Must Avoid Effectively Prohibiting Wireless Services.

To meet the important national goal of fostering robust and competitive wireless services, the TCA preempts state and local governments from taking actions (including zoning decisions) that prohibit or effectively prohibit personal wireless services.¹³ Even if the Board was to identify a code-based reason to disfavor the Project, the City is preempted from prohibiting or effectively prohibiting wireless service. An effective prohibition occurs whenever a siting authority denies an application to construct a wireless communications facility despite the wireless provider's showing that it has a need to provide and improve wireless services in a specific area, and that it has taken steps to ensure the proposed facility best meets the siting authority's applicable regulations.¹⁴ Here, AT&T has demonstrated, by industry-standard methods, including engineering coverage maps, that it has a significant gap in service coverage. AT&T's network service needs and its proposed solution have been verified by independent engineers, including confirmation of service levels and an industry-standard drive test. AT&T also worked hard to make sure the Project is the least intrusive means to close this coverage gap, including by conducting a comprehensive alternative sites analysis and working with City Staff on facility design. Neither AT&T nor the City has identified any other available, feasible, and less intrusive alternative. Based on this, the City's denial of the Project would amount to an effective prohibition and a violation of federal law.

¹³ 47 U.S.C. § 332(c)(7)(B)(i)(II).

¹⁴ See *MetroPCS, Inc.*, 400 F.3d at 730-35 (adopting least intrusive means test for effective prohibition); *City of Anacortes*, 572 F.3d at 995-99 (held once wireless provider demonstrates a significant gap and that its solution is least intrusive, burden shifts to local government to identify an available, feasible, and less intrusive alternative); *In the Matter of California Payphone Association Petition for Preemption, Etc.*, Opinion and Order, FCC 97-251, 12 FCC Rcd 14191 (July 17, 1997) (adopting material inhibition test); *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, FCC 18-133 (September 27, 2018) ("Infrastructure Order") at ¶¶ 35-37, n.95.

V. ARGUMENT

A. The Planning Commission’s CUA and Shadow Findings Are Supported by Substantial Evidence.

Under San Francisco Municipal Code (SFMC) section 303(c), the Planning Commission must approve an application and authorize a Conditional Use if the facts presented are such to establish that:

1. The proposed use or feature, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community.¹⁵
2. Such use or feature as proposed will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity, or injurious to property, improvements or potential development in the vicinity, with respect to aspects including but not limited to the following:
 - a. The nature of the proposed site, including its size and shape, and the proposed size, shape and arrangement of structures;
 - b. The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading and of proposed alternatives to off-street parking, including provisions of car-share parking spaces, as defined in Section 166 of this Code.
 - c. The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor;
 - d. Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs; and
3. Such use or feature as proposed will comply with the applicable provisions of this Code and will not adversely affect the General Plan; and
4. Such use or feature as proposed will provide development that is in conformity with the stated purpose of the applicable Use District.¹⁶

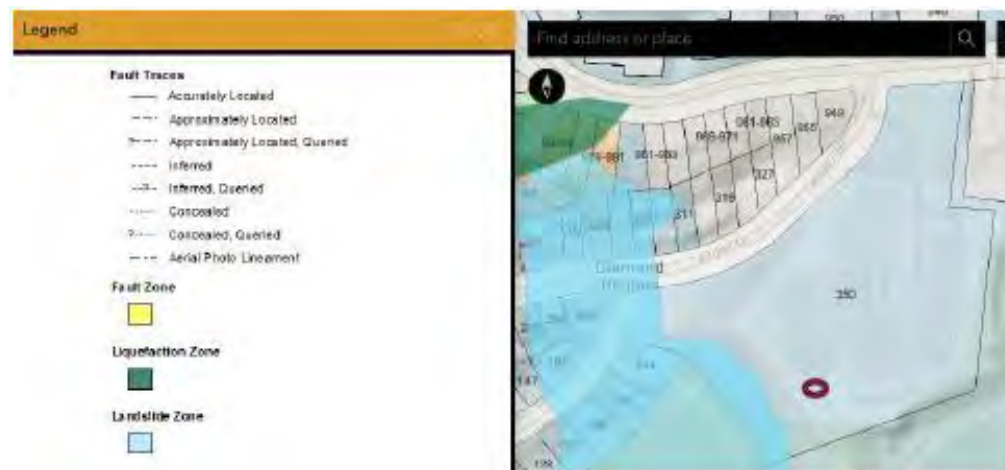
¹⁵ Project does not exceed the Non-Residential Use Size limitations for the P-OS zoning district. Therefore, related findings are omitted.

¹⁶ SFMC § 303(c)(5) references additional criteria specific to the use. Subsection (s) applies to wireless telecommunication services facilities but does not have additional criteria, only limiting CUAs for a duration of 10 years.

The September 25, 2025, City Planning Staff Report for the Project clearly lays out the substantial evidence supporting the Commission’s CUA approval.

B. The Project Site is Not in a Mapped Landslide Zone

DHCA alleges the Project site is in a mapped earthquake-induced landslide zone. According to the California Geologic Survey, the southwestern portion of the Police Academy parcel is within a landslide zone, but the Project site itself is outside this delineation as shown in the figure below.¹⁷ The City similarly maps the landslide zone on the southwestern portion of the Police Academy parcel, outside the Project site boundary.¹⁸



DHCA’s alleged landslide zone argument is without merit and should be disregarded in the Board’s evaluation of the Project.

C. The Project Site is Stable.

DHCA makes the unsupported assertion that “infill . . . suggests soil instability” and concludes (again without evidence) that just disturbing the soil in construction might affect the neighborhood and its groundwaters. Evaluation of geologic conditions is a technical subject, and lay opinion unsupported by an adequate factual foundation does not constitute substantial evidence. As explained in the attached letter from SALEM Engineering Group, Inc. (SALEM), Engineering Geologist Dean Ledgerwood (CEG #2613) visited the Police Academy property, including the Project site and adjacent slope, and observed no visible evidence of previous slope movement/landslides (see Attachment B). Further, SALEM reviewed a 1999 Geotechnical Investigation Report for the parcel and concluded “documented distress to the existing buildings

¹⁷ <https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/>.

¹⁸ <https://data.sfgov.org/-/San-Francisco-Seismic-Hazard-Zones/7ahv-68ap>.

has been attributed to settlement of the underlying fill soils and was not caused by slope instability.” SALEM further concluded:

The planned tower is anticipated to be supported using a CIDH pile foundation. Cellular tower monopole foundation loads are generally considered to be light to moderate. The cellular tower vertical loads supported on CIDH pile foundations would evenly distribute the load stresses and therefore, would not be anticipated to impart significant increased stresses to the existing fills. Thus, the tower structure would not be anticipated to result in an increased potential for additional static settlements to occur outside the tower lease area.

Construction of the proposed tower improvements would not be anticipated to increase surface water drainage over or into the existing western slope area. Also, the tower construction would not result in a potential for increased saturation of the fills.

Development on fill is common in the City and other developed areas and construction methods and materials are specifically and reliably designed to accommodate construction on fill. DHCA does not have the technical expertise to opine regarding soil stability, seismic safety, or construction techniques. DHCA’s speculation in its appeal letter does not constitute substantial evidence and cannot be used to contradict expert opinion.

D. The Project Is a Monopole, Not a Monopine.

The DHCA appeal letter suggests AT&T has somehow misled the City regarding the tower’s appearance. DHCA appears to be referencing previous references to the Project as a “monopine” in earlier plans submitted to the City. As proposed by AT&T and analyzed by the City, the Project is a monopole. The Project plans have been corrected. AT&T disagrees with DHCA’s arguments regarding the use of disguising materials, but such arguments are irrelevant here, in any case.

E. Neither the Project Nor the Project Site Is a Significant Fire Hazard.

Without any supporting (let alone substantial) evidence, the DHCA appeal letter alleges that “wireless facilities similar to the Project are a significant fire hazard and have caused fires in multiple areas in California.” DHCA also alleges the eucalyptus trees bordering the Project site are themselves a fire hazard. Contrary to DHCA’s assertions, it is not “highly foreseeable” that there would be a “spark, electrical failure, or fire” on the Project site. According to the Wireless Infrastructure Association, there were 142,100 cell towers (defined as free-standing structures

over 50 feet in height) in the United States in 2022.¹⁹ The ignition of cell towers is not a frequent or expected occurrence. DHCA does not have the technical expertise to opine regarding the likelihood the Project would catch fire and the speculation in its appeal letter does not constitute substantial evidence.

The City Fire Department would be actively involved in the building permit process for the Project, confirming fire safety compliance for the tower and generator (i.e., emergency shutoff procedures and signage, alarms, spill containment, exhaust location, double walled piping, etc.). Further, the Project will be designed in accordance with APCO/ANSI 2.106.1-2019 public safety grade site hardening requirements developed by the American National Standards Institute and the Association of Public Safety Communications Officials. This is a voluntary standard that lays out site-hardening requirements—such as power, redundancy, physical security, and environmental resilience—needed to make wireless communications facilities “public safety grade.” It’s intended as a comprehensive best-practice guide for public-safety network builders to ensure mission-critical sites remain robust and available during disasters or other adverse conditions. The Project will fill a critical need should a disaster strike, not cause one.

F. The Project Will Not Impact Glen Canyon Park.

Without providing any specific details, DHCA generally alleges the Project would impact Glen Canyon Park. The 2006 Significant Natural Resource Areas Management Plan (SNRAM Plan) identifies 60 acres of Glen Canyon Park as a “Significant Natural Area.” Each Natural Area was broken down into 3 types of Management Areas, which represent differing levels of sensitivity, species presence, and habitat complexity as follows:²⁰

- MA-1 – most sensitive to human-generated disturbance. Areas support listed or special-status species, support habitat for significant number of sensitive species, contain relatively high portion of native plants or plant richness, etc.
- MA-2 – comparatively more resilient to human disturbance than MA-1 and buffer zone between MA-1 and MA-3. Areas include important habitats, remnant native vegetation of otherwise widespread plant communities, habitat for local native wildlife species, etc.
- MA-3 – least sensitive to human-generated disturbance and buffer zone for MA-1 and MA-2 from surrounding developed recreational and other land uses. Areas include predominance of non-native vegetation, absence of sensitive species but support complement of some native plants and wildlife habitat, etc.

¹⁹ [https://www.benton.org/headlines/us-cell-towers-and-small-cells-numbers#:~:text=The%20Wireless%20Infrastructure%20Association%20\(WIA,at%20the%20end%20of%202022.](https://www.benton.org/headlines/us-cell-towers-and-small-cells-numbers#:~:text=The%20Wireless%20Infrastructure%20Association%20(WIA,at%20the%20end%20of%202022.)

²⁰ SNRAM Plan, pp. 1-4 through 1-6.

According to Figure 6.3-5 of the SNRAM Plan, the Police Academy site is adjacent to an MA-3 area of Glen Canyon Park, an area designated as least sensitive to human-generated disturbance. An MA-3 area is not an environmental resource of critical concern. The Project site is approximately 150 feet away from this MA-3 area of Glen Canyon Park. The Project will not interfere with any of the Glen Canyon Park site improvements, vegetation management, or wildlife recommendations in the SNRAM Plan. Neither will the Project impact the utilization of the Glen Canyon Park for recreation purposes. To the extent DHCA alleges RF emissions could impact wildlife, as discussed above in Section III.B, the TCA prohibits regulation “on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the [FCC]’s regulations concerning such emissions.”²¹ DHCA provides no substantial evidence supporting its contentions that the Project would impact Glen Canyon Park or the wildlife or plant species located therein.

G. The Project Does Not Impact the St. Nicholas Antiochian Orthodox Church.

The DHCA appeal letter suggests that the St. Nicholas Antiochian Orthodox Church (Church), located at 5200 Diamond Heights Boulevard, is a historic resource that would be impacted by the Project. The Church was built in 1965. The Church is not listed on the National Register of Historic Places or the California Register of Historic Resources. It is not a designated City Landmark or listed on an adopted local historic register. Under the City’s CEQA Review Procedures for Historic Resources,²² the Church is Category B as it is age-eligible for further consultation and review.

Even if the Church were considered a historic resource (though there is no substantial evidence that it is), the Project does not impact the Church. The Police Academy parcel is southwest of the Church (see Figure below), and the Project is located in the southwestern portion of the Police Academy parcel, behind one- and two-story buildings. In the Project’s photosimulations (Exhibit F to the 9/25/25 Planning Commission staff report), Shot Point 4 at the intersection of Amber Drive and Duncan Street is closer to the Project site than the Church (but at a similar elevation).

²¹ 47 U.S.C. § 332(c)(7)(B)(iv).

²² https://sfplanning.org/sites/default/files/documents/preserv/bulletins/HistPres_Bulletin_16.PDF



As shown in the figure below, the Project will have minimal visual impact at Shot Point 4, and because the Church is further away, it will not have a significant visual impact on the Church. As such, the Project would not cause a substantial adverse change in the significance of the Church.



H. The Project Does Not Impact the George Christopher Playground or Noe Valley Preschool.

Without providing any detail, DHCA alleges the Project would impact the George Christopher Playground and Noe Valley Preschool. The Project site is approximately 200 feet from center field of the baseball field and 350 feet from the playground and preschool. As discussed throughout this memorandum, the Project would not affect soil stability or increase fire hazards. Further, with implementation of the FirstNet network in the area, public safety will be increased by the Project.

I. The Project Is Consistent with the City's General Plan.

In determining a project's consistency with its own general plan, the City has broad discretion in interpreting General Plan policies and the extent to which the project conforms with those policies.²³ A project need not be an "exact match" with a general plan; "state law does not require precise conformity," but only requires the project be "compatible with the objectives, policies, general land uses, and programs" of the general plan.²⁴ No project could completely satisfy every policy in a general plan and state law does not impose such a requirement.²⁵

The DHCA appeal letter suggests the Project is inconsistent with open space preservation and public health and safety policies under the Open Space and Safety Elements of the City's General Plan. The DHCA letter does not specifically allege which policies are inconsistent nor allege any failing with the findings made in the City's September 25, 2025, Planning staff report. As such, DHCA has offered no actual contradiction to the City's interpretation, which must be afforded great deference.

J. The Project Complies with the City's Zoning and Height Restrictions.

Also without providing any detail, DHCA alleges the Project violates the City's zoning and height restrictions. As explained in the September 25, 2025, Planning staff report, however, the Project fully complies with the use and height restrictions for the P-OS zoning district.

K. Issues Raised In Other Comment Letters.

The DHCA appeal letter purports to incorporate "all the comments and concerns raised to date on the Project." To that end, this section responds to the "Memorandum in Opposition" (Memorandum) submitted for the Commission's September 25, 2025, hearing. The Memorandum argues six points: (1) Project would violate applicable local laws; (2) Project would

²³ *Anderson First Coal. v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1192 (*Anderson*).

²⁴ *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 678, quotation omitted.

²⁵ *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 719.

have detrimental aesthetic impacts and decrease property value; (3) Project could increase height without further zoning approval; (4) Need for Project has not been established; (5) Geological concerns; and (6) Denial requires written decision and litigation risk is minimal. As discussed below, these points are without merit.

1. Project Complies with Local Laws

As discussed in Sections IV.I and IV.J above, the Project is consistent with the City's General Plan and complies with the zoning regulations.

2. Project Would Not Have Detrimental Aesthetic Effects or Decrease Property Values

Generalized Aesthetic Concerns. The Memorandum alleges problems with AT&T's photosimulations and visual impact analysis due to the photos being taken from public vantage points instead of neighboring homes. The Memorandum further overstates and inappropriately relies on a 2005 federal Second Circuit decision, *Omnipoint Communications Inc. v. The City of White Plains*, 430 F.3d 529, to assert the neighbors' private views are substantial evidence to support a denial. At issue is whether there is substantial evidence to make the CUA findings set forth in SFMC section 303(c) (and discussed above in Section V.A), not whether the Project may impact private views under New York law as in *Omnipoint*. The CUA findings do not require a finding regarding the impact on private view corridors. AT&T identified the Police Academy property as the City's top preference location for siting – this is a Preference 1 Site under the City's *Wireless Telecommunications Services Facilities Siting Guidelines*. And unlike the *Omnipoint* tower (which was 3 times the height of the nearest trees), the Project is designed to provide the needed wireless coverage with the least visual impact, only 10-20 feet higher than the surrounding trees.

The Memorandum includes general concerns about the aesthetic impact of the Project. These concerns claim the Project will detract from the beauty of the area and create a displeasing aesthetic. But these generalized concerns cannot be considered substantial evidence to support denying the Project.²⁶ As set out below, the comments included are hardly substantial and offer no specific complaints about the Proposed Tower itself.²⁷

²⁶ See, e.g., *California RSA No. 4 v. Madera County*, 332 F.Supp.2d 1291, 1308-09 (E.D. Cal. 2003) (generalized expressions of concern regarding aesthetics fail to meet the substantial evidence threshold under the Act) (citing *Omnipoint Corp. v. Zoning Hearing Bd.*, 181 F.3d 403, 409 (3d Cir.1999); *Cellular Telephone Co. v. Town of Oyster Bay*, 166 F.3d 490 (2nd Cir. 1999)).

²⁷ *Id.*; see also *Charter Twp. of W. Bloomfield*, 691 F.3d at 800 (“[w]hile concerns brought before the Board certainly relate to building a wireless facility that is aesthetically pleasing and ‘harmonious with the surrounding area,’ the evidence in the record is hardly substantial. The generalized complaints effectively amount to NIMBY –

Concerns About Impacts to Property Values. The Memorandum speculates that construction of the Project will have an adverse impact on property values in the area. But these concerns are supported only by generalized statements and irrelevant studies and arise from legally inappropriate and misplaced fears about RF emissions.

In support of the Memorandum, some realtors claim property values will drop, but most of these comments are again based on misplaced health concerns, and none offer any supporting data or case studies. Courts within the Ninth Circuit and elsewhere have long agreed that general concerns about property values or aesthetics do not constitute substantial evidence to support denial of a permit to install a wireless telecommunications facility.²⁸

The articles and reports relied on by the Memorandum are also not helpful here. For example, the Memorandum relies on an article from New Jersey that concerned a site-specific analysis, which was itself sharply criticized for relying on data about much taller towers (including a 450-foot-tall lattice tower).

The Memorandum also cites studies by Sandy Bond and her colleagues, which were primarily conducted in New Zealand in the 1990s, and then followed up in the Eastern U.S. in the 2000s. Those studies found some instances when property values decreased near cell towers and other instances when property values **increased** by up to 12% after a nearby cell tower was constructed.²⁹ In fact, the authors specifically explained that their results were based largely on survey respondents' inappropriate perceptions of health effects from cell towers.³⁰ The authors also concluded that any effects on property values "generally diminished with distance from the tower."³¹ And these studies carefully noted that their results are location specific and **should not be generalized to other locations**.³² In other words, even the authors of this cited study do not endorse applying them to this situation. The studies have no bearing here – they concern cell towers placed within residential neighborhoods in New Zealand and Florida rather than the

not in my backyard . . . [g]eneral concerns from a few residents that the tower would be ugly or that a resident would not want it in his backyard are not sufficient.").

²⁸ See, e.g., *California RSA No. 4*, 332 F.Supp.2d at 1308-09 (generalized expressions of concern regarding the effect on property values or aesthetics fail to meet the substantial evidence threshold under the Act) (citing *Omnipoint Corp. v. Zoning Hearing Bd.*, 181 F.3d 403, 409 (3d Cir.1999); *Town of Oyster Bay*, 166 F.3d 490).

²⁹ Bond & Wang, *The Impact of Cell Phone Towers on House Prices in Residential Neighborhoods*, The Appraisal Journal, Summer 2005, at 269 (explaining the increase in property values was likely due to the lack of concern over possible health effects). In the same report, the authors also found another instance where there was an increase, albeit statistically insignificant (0.4%) increase, in property values after construction of a cell tower. See *id.* at 270.

³⁰ See *id.*

³¹ See Bond, *The Effect of Distance to Cell Phone Towers on House Prices in Florida*, The Appraisal Journal, Fall 2007.

³² See *id.* at 271 ("caution must be used in making generalizations from this study or applying the results directly to other similar studies or valuation assignments").

Project, which will be sited on public property hundreds of feet from nearby homes and screened by existing mature trees.

The Memorandum suggests homes could become “wholly unsaleable” if wireless facilities are built in the vicinity with a footnote to Federal Housing Administration (FHA) loans and federal Housing and Urban Development Reference Guide. The Guide cited has been archived since 2012³³ and is not part of current FHA regulations. Further, the cited provisions reference high-voltage transmission lines and radio/TV transmission towers, and do not address wireless facilities. In the current FHA Single Family Housing Policy Handbook, appraisers evaluate proximity to overhead electric power transmission and local distribution lines and towers, not wireless facilities.³⁴ The Memorandum’s footnote also references a 2012 Dallas-area news article, but this article is not available for review.

Under the TCA, these sources cannot be the basis to deny AT&T’s CUA application. Far from substantial evidence, these are generalized concerns propped up by inapplicable findings which themselves do not support the Memorandum’s claims about property values. Further, AT&T’s Project cannot be rejected based on health concerns (whether those concerns are raised directly, or indirectly through some proxy such as property values).³⁵ Given the federal preemption regarding RF emissions, “concern over the decrease in property values may not be considered as substantial evidence if the fear of property value depreciation is based on concern over the health effects caused by RF emissions.”³⁶ Because the unsupported speculation here regarding property values is itself premised on concerns over RF emissions, it cannot be considered.

Moreover, there was no evidence submitted with the Memorandum of the alleged effect on property values in San Francisco (or anywhere in California) from installation of a monopole. This omission is noteworthy not only because real estate market value predictions are location specific, but also because California realtor groups have conducted studies that show that residential property values are **not** negatively impacted by proximity to wireless communications towers.³⁷ Indeed, more and more homebuyers are placing a premium on wireless connectivity. Because there is no evidence – let alone substantial evidence – to support these general claims, the City cannot deny AT&T’s application on these bases.

³³ <https://archives.hud.gov/offices/hsg/sfh/ref/sfhp1-18.cfm>

³⁴ <https://www.hud.gov/sites/default/files/OCHCO/documents/40001-hsgh-Update-17.pdf>

³⁵ H.R. Conference Report No. 104-458, 208 (1996).

³⁶ *AT&T Wireless Services of California LLC v. City of Carlsbad*, 308 F.Supp.2d 1148, 1159 (S.D. Cal. 2003) (quoting H.R. Conference Report No. 104-458, 201 (1996)).

³⁷ See Joint Venture Silicon Valley Network, *Wireless Communications Initiative Study: Wireless Facilities Impact on Property Values* (Nov. 2012) (analyzed property values for over 1,600 single-family homes; concluded “It is quite clear from the data that the distance from a wireless facility has no apparent impact on the value or sale price”).

3. The City Controls the Ultimate Height of the Project.

The Memorandum alleges that Section 6409 of the Middle Class Tax Relief and Job Creation Act of 2012 would allow AT&T a unilateral right to expand the height of the Project. However, the Project is located on the Police Academy parcel and would be subject to a ground lease between the City and AT&T. As landlord, the City controls the ultimate height of the Project through the ground lease.

4. AT&T Has Established the Need for the Project.

AT&T's radio frequency engineers have identified a significant gap in service coverage and capacity in the City, including a large area bordered by the intersection of Amber Drive and Turquoise Way to the north, O'Shaughnessy Blvd. to the south and west, and Diamond Heights Blvd. to the east. This gap area includes numerous homes, businesses in the Diamond Heights Shopping Center, well-traveled roads, Glen Canyon Park, St. Nicholas Antiochian Orthodox Church and other points of interest in the vicinity. (See Attachment C – Radio Frequency Statement.)

In addition, the Project is a part of AT&T's commitment to supporting public safety through its partnership with FirstNet, the federal First Responder Network Authority. Conceived by the *9/11 Commission Report* as necessary for first responder communications, Congress created the federal First Responder Network Authority, which selected AT&T to build and manage FirstNet, the first-ever nationwide first-responder wireless network. The Project will provide new service on Band 14, which is the nationwide high-quality spectrum set aside by the U.S. government for public safety. Deployment of FirstNet in the subject area will improve public safety by putting advanced wireless technologies into the hands of public safety agencies and first responders.

AT&T's service coverage maps submitted with its CUA application depict coverage simulated by a sophisticated, industry-standard wireless network modeling tool. As seen in these coverage maps, AT&T's coverage gap impacts a large portion of the City, and this Project will close that gap. Specifically, AT&T has a significant gap in 4G LTE service coverage. In addition to being AT&T's core coverage layer, 4G LTE service on 700 MHz is the sole source of FirstNet service in San Francisco.

As part of the application process, the City requires an independent, third-party engineering verification of the coverage gap. AT&T's significant service coverage gap was peer reviewed and verified. (See Attachment D – Hammett & Edison, Inc. Letter.) This independent engineering analysis confirms that AT&T's network design service thresholds are industry standard. The engineers then verified this significant service coverage gap as depicted in AT&T's coverage maps by conducting a drive test, which concluded that AT&T has relatively weak signal

levels in the gap area, that those gaps are accurately depicted by the coverage maps, and that significant improvements in coverage will be achieved by installing the Project.

AT&T worked hard to carefully select the Project's location and design to minimize impacts to the community while maintaining a clear line-of-sight for signals to provide reliable wireless service coverage to the gap area. AT&T investigated alternative sites and designs, and evaluated multiple properties in the area, to make sure the Project was the least intrusive means to close the significant service coverage gap. (See Attachment E – Alternative Sites Analysis.) Specifically, AT&T analyzed seven (7) properties and found all locations other than the subject site at the Police Academy to be unavailable, infeasible, or both. AT&T did not identify another alternative that was available, feasible, and less intrusive. The City also did not identify a more-preferred alternative, let alone one that would be available and feasible.

In recommending approval of the application, Planning Staff found the Project "to be necessary, desirable, and compatible with the surrounding neighborhood, and not to be detrimental to persons or adjacent properties in the vicinity." Planning Staff also found the Project "will enhance the area's public safety infrastructure by providing improved wireless telecommunication services to the surrounding neighborhood at all times, as well as during natural disasters or other emergencies."

In approving the CUA, the Commission confirmed the location is the City's top preference and that the Project will meet all conditional use findings. The Commission specifically found the Project site preferable "based on factors including quality of coverage and aesthetics." The Commission explained in detail that "[t]he project complies with all relevant requirements and standards of the Planning Code and is consistent with objectives and policies of the General Plan...." The Commission further concluded that "as designed, the Project would contribute to the character and stability of the neighborhood and would constitute a beneficial development."

Coverage Data. The Memorandum suggests AT&T's coverage maps may not be based on adequate data and criticizes AT&T for not presenting its drive test data. But AT&T's verified, industry-standard coverage maps are the output from a sophisticated network design tool and are based on the complex analysis of many data sources. To evaluate signal strength and other network parameters, as well as to plan and build its wireless network, AT&T uses highly sophisticated software called Atoll, which employs a variety of databases and information sources, including AT&T network parameters, population data, type of area to be covered, clutter database (obstruction information such as dimensions of buildings, trees, and roads), and terrain information (above sea level height value for each 5 meter by 5 meter area). Atoll measures and simulates the existing and forecasted network and environment and can reliably simulate real-life existing and future wireless service coverage, to help identify and fill gaps in wireless network coverage. A key output from Atoll are coverage maps, like the ones provided here, that simulate signal propagation based on existing data and forecasted propagation based on proposed

network changes. And again, AT&T's coverage maps were verified with drive test data collected and analyzed by independent engineers.

Online Coverage Maps. The Memorandum points to coverage maps available online that show AT&T has some coverage in the area. But these FCC maps and other online maps, including AT&T's coverage viewer website, are depictions of outdoor service levels, and do not depict in-building service levels. AT&T needs to provide reliable in-building service to the significant gap area, which requires stronger signals than what is needed to provide outdoor or in-vehicle coverage. Indeed, the legends to AT&T's online maps explain the coverage depicted is only approximate outdoor coverage and that actual coverage is subject to many other variables.

When evaluating a significant service coverage gap, courts rely on coverage maps like the maps submitted with AT&T's CUA application. Courts do not rely on the types of online maps that the Memorandum mentions.³⁸ The Board, likewise, should rely on AT&T's coverage maps submitted with the CUA application and not on various online maps noted in the Memorandum (which do not address the level of coverage sought by AT&T).

5. The Project Does Not Implicate Geological Concerns.

Similar to the DHCA appeal letter, the Memorandum raises concerns regarding the mapped landslide zone and soil instability. As summarized in the SALEM report:

Construction of the planned 104' monopole tower and supporting equipment is considered feasible. A site specific geotechnical investigation within the limits of the planned tower should be performed. The future geotechnical investigation would include recommendations to adequately address support of the tower within existing fills and will address seismic and soil stability concerns in accordance with current industry standards and requirements of the current California Building Code.

As explain in Sections IV.C and IV.D, above, the Project site is not within a mapped landslide zone and the slope instability is not a concern for the Project or the Project site.

³⁸ See, e.g., *L.A. SMSA Ltd. P'ship*, at *32-33 (online coverage maps depicting only a general view of Verizon's coverage are not determinative of the issue given the stronger RF engineering evidence of the gap); *City of Huntington Beach*, *31-38 (T-Mobile's engineering coverage maps used to design its network, and not its online maps depicting approximate outdoor coverage, amount to substantial evidence); *MetroPCS N.Y., LLC v. Village of East Hills*, 764 F.Supp.2d 441, 453-54 (E.D.N.Y. 2011); *Extenet Sys., Inc. v. Village of Plandome*, 2021 U.S. Dist. LEXIS 186651 (E.D.N.Y. Sept. 29, 2021), *45-46 (coverage maps displayed on Verizon's website do not qualify as substantial evidence because they "are overwhelmingly outweighed" by Verizon's coverage maps and statement by its RF engineer).

6. Approval of the Project CUA Comports with Federal Law and Avoids an Unlawful Prohibition.

The TCA preempts a local government from denying an application for a wireless facility when doing so would “prohibit or have the effect of prohibiting the provision of personal wireless services.”³⁹ Courts have found a permit denial to amount to an “effective prohibition” when a wireless provider demonstrates (1) a significant gap in wireless service coverage, and (2) that the Project would provide the “least intrusive means,” in relation to the land use values embodied in local regulations, to provide the service coverage necessary to fill that gap.⁴⁰ When, as here, a wireless provider satisfies both of these requirements, state and local standards that would otherwise be sufficient to permit denial of the facility are preempted and the local government must approve the wireless facility.⁴¹ In fact, once those two prongs are satisfied (as they are here) the burden shifts to the local government to show that another alternative is available that fills the significant gap in coverage, that it is technically feasible, and is less intrusive than the Project.⁴² Here, City Staff and the Planning Commission concur that AT&T’s Project is an appropriate solution to close AT&T’s significant gap in service coverage.

The FCC has long ruled that an effective prohibition occurs whenever the decision of a local government materially inhibits wireless services,⁴³ and the Ninth Circuit has upheld this material inhibition standard,⁴⁴ and has held that the FCC’s material inhibition standard “is consistent with” the judicial least intrusive means test.⁴⁵ According to the FCC, the “effective prohibition analysis focuses on the service the provider wishes to provide, incorporating the capabilities and performance characteristics it wishes to employ, including facilities deployment to provide existing services more robustly, or at a better level of quality, all to offer a more robust and competitive wireless service for the benefit of the public.”⁴⁶ Thus, a local government “could

³⁹ 47 U.S.C. § 332(c)(7)(B)(i)(II).

⁴⁰ See e.g., *Metro PCS, Inc. v. City and County of San Francisco*, 400 F.3d 715, 734-35 (9th Cir. 2005), abrogated on other grounds, *T-Mobile South, LLC v. City of Roswell*, 135 S.Ct. 808 (2015); *Sprint PCS Assets, LLC v. City of Palos Verdes Estates*, 583 F.3d 716, 726 (9th Cir. 2009).

⁴¹ See *City of Anacortes*, 572 F.3d at 998-99.

⁴² *Id.*, 572 F.3d at 998-99 (“A locality is not compelled to accept the provider’s representations. However, when a locality rejects a prima facie showing, it must show that there are some potentially available and technologically feasible alternatives.”).

⁴³ See *In the Matter of California Payphone Association Petition for Preemption, Etc.*, Opinion and Order, FCC 97-251, 12 FCC Rcd 14191 (July 17, 1997); see also Infrastructure Order at ¶ 35.

⁴⁴ *City of Portland v. United States*, 969 F.3d 1020, 1034-35 (9th Cir. 2020), cert. denied, *City of Portland v. United States*, 141 S. Ct. 2855 (2021).

⁴⁵ *Sprint Telephony PCS, L.P. v. Cnty. of San Diego*, 543 F.3d 571, 578 (9th Cir. 2008).

⁴⁶ Infrastructure Order at n. 95.

materially inhibit service in numerous ways – not only by rendering a service provider unable to provide existing service in a new geographic area or by restricting the entry of a new provider in providing service in a particular area, but also by materially inhibiting the introduction of new services or the improvement of existing services.”⁴⁷

The Memorandum’s Test for Effective Prohibition is Erroneous. The Memorandum relies on an inapplicable test for effective prohibition. The applicable tests are the FCC’s material inhibition test and the judicial least intrusive means test, as described above. Yet the Memorandum claims AT&T failed to show that the Project is the only viable option to close its significant gap. That “only viable option” test has been expressly rejected by the Ninth Circuit.⁴⁸ Indeed, the correct test does not require AT&T to evaluate every single property in the target area⁴⁹ and shifts the burden to the City to identify an available, feasible, and less intrusive alternative.⁵⁰

Against this controlling law, the Memorandum bases its argument on a lower level federal court in New York that decided the only way a provider could show an effective prohibition was to demonstrate that no calls could be placed in the gap area.⁵¹ That decision does not apply to applications in the Ninth Circuit, as the Memorandum readily concedes. Indeed, the cited case actually ignored the Second Circuit’s controlling precedent.⁵² What’s more, courts in the Ninth Circuit and the FCC have recognized significant service coverage gaps exist for a variety of reasons, including the inability to make voice calls, poor quality connections, slow data speeds, etc.⁵³

The Memorandum strays even further from the applicable legal standard and suggests that an effective prohibition does not exist even when the evidence shows a coverage gap at a

⁴⁷ Id. at ¶ 37

⁴⁸ *MetroPCS, Inc.*, 400 F.3d at 734.

⁴⁹ *New Cingular Wireless v. Cnty. of Ventura*, 2022 U.S. Dist. LEXIS 53923, at *16 (TCA’s least intrusive analysis does not require “elimination of every theoretical possible alternative”) (citation omitted); *Cellco P’ship v. White Deer Twp. Zoning Hearing Bd.*, 609 F. Supp. 3d 331, 339 (M.D. Pa. 2022); *Eco-Site, LLC v. Cnty. of Pueblo*, 2020 U.S. Dist. LEXIS 111855 (D. Colo. June 25, 2020), at *10.

⁵⁰ *City of Anacortes*, 572 F.3d at 998-99.

⁵¹ *See Extenet Sys., Inc. v. Village of Flower Hill*, 2022 U.S. Dist. LEXIS 135267 (E.D.N.Y. July 29, 2022).

⁵² *See TCG N.Y., Inc. v. City of White Plains*, 305 F.3d 67, 76 (2d Cir. 2002), cert. denied, 538 U.S. 923 (2003) (held “a prohibition does not need to be complete or ‘insurmountable’” to violate the TCA as an effective prohibition).

⁵³ *See, e.g., Bay Area Cellular Tel Co. v. Francisco*, 2005 U.S. Dist. LEXIS 31927, *21 (N.D. Cal. Nov. 23, 2005); Infrastructure Order, at ¶ 37, n.87 (services covered under 47 U.S.C. §§ 253 and 322 include “any covered service a provider wishes to provide, incorporating the abilities and performance characteristics it wishes to employ, including to provide existing services more robustly, or at a higher level of quality—such as through filling a coverage gap, densification, or otherwise improving service capabilities.”).

specific level of service. But case law in the Ninth Circuit makes abundantly clear that the gap analysis is not so limited.⁵⁴ In fact, courts within the Ninth Circuit analyze significant gaps service by service, finding an actionable coverage gap may exist at any level of service.⁵⁵ Moreover, focusing on AT&T's 4G LTE service is necessary in this case, since AT&T provides FirstNet services on its 4G LTE platform over its 700 MHz spectrum.

Because no available, feasible, and less intrusive alternative Project site has been identified, the Project needs to be approved to avoid an effective prohibition. While the Memorandum points out the City is not compelled to accept AT&T's proposal, the Memorandum fails to acknowledge that before it can deny the CUA, the City must identify an available, feasible, and less intrusive site for AT&T to construct its Project. The Commission has already concluded that the Project site is the only available and feasible location for the Project, and that no appropriate alternative site can be identified.

AT&T has demonstrated it has a significant service coverage gap in the vicinity of the Project. AT&T's coverage maps (submitted with its application and made part of the public record) depict and describe AT&T's service coverage gap in this portion of the City. Specifically, AT&T needs to provide reliable in-building service coverage in the gap area.⁵⁶ The proposed service coverage from the Project is depicted in the coverage maps. These coverage maps show that placing the Project in this location will close AT&T's significant service coverage gap.

AT&T's coverage maps are industry-standard maps based on sophisticated tools and a complex set of databases. These coverage maps are precisely what courts consider as evidence of significant gap in service coverage.⁵⁷ Courts also rely on drive tests when available.⁵⁸ Again, the existence and scope of AT&T's existing coverage gap is depicted on industry-standard

⁵⁴ *MetroPCS, Inc.*, 400 F.3d at 730 (proof of a general ban on wireless service is not necessary to prove an unlawful effective prohibition under the TCA).

⁵⁵ *See, e.g., L.A. SMSA Ltd. P'ship*, at *16-29 (while acknowledging existence of Verizon's 3G coverage, court found Verizon had significant service coverage gap in its 4G LTE service); *City of Huntington Beach*, at *17-24 (court separately analyzed gap analysis for T-Mobile's 2G, 3G, and 4G offerings).

⁵⁶ Courts within the Ninth Circuit and across the country hold the in-building standard is the appropriate benchmark for finding a significant service coverage gap exists. *See, e.g., MetroPCS Inc. v. City & Cnty. of San Francisco*, No. 4:02-cv-03442-PJH, 2006 U.S. Dist. LEXIS 43985, at *10 (N.D. Cal. June 16, 2006) ("*MetroPCS II*") (held that large "coverage holes" that "extend to the interior of buildings," are actionable under the Act); *T-Mobile W. Corp. v. City of Huntington Beach*, No. 2:10-cv-02835-CAS (Ex), 2012 U.S. Dist. LEXIS 148170, *11-12, *49 (C.D. Cal. Oct. 10, 2012) (held that "providing reliable in-building wireless service . . . is essential, and its absence constitutes a significant gap in coverage"; ruled T-Mobile demonstrated significant gaps in in-building coverage); *L.A. SMSA Ltd. P'ship. City of L.A.*, No. 2:16-cv-04954-FLA, 2021 U.S. Dist. LEXIS 160046, *21-26 (C.D. Cal. Aug. 24, 2021) (gaps in in-home wireless service coverage constitute a significant coverage gaps).

⁵⁷ *See, e.g., MetroPCS II*, at *17-32; *L.A. SMSA Ltd. P'ship*, at *16-34; *City of Huntington Beach*, at *16-25, 38.

⁵⁸ *Id.*

coverage maps and verified by drive test data collected and analyzed by an independent engineer.

AT&T has presented a meaningful comparison of all candidate locations, described the Project, and explained why the other sites and designs are not viable. Neither AT&T nor the City has identified another viable site. As the analysis demonstrates, the Project is not only the best available and least intrusive means to do so, but the only way for AT&T to bring critical wireless services to the Project site area. Approval of AT&T's application is required to avoid an effective prohibition. The Planning Commission's approval comports with federal law. The Board should approve AT&T's application and deny the appeal.


VI. Conclusion

As discussed above, the Planning Commission's findings for the Project Conditional Use Authorization Approval are supported by substantial evidence. The appeal does not raise concerns to justify reversing the approval of AT&T's application. Even if the Board was to identify a code-based reason to disfavor the Project, the City is preempted from effectively prohibiting wireless service. As a practical matter, there is no need for the Board to rule against the proper application of federal law. The Project is well-designed, meets applicable standards, and will provide vast improvements to wireless services for wireless customers and first responders. DHCA has provided no substantial evidence to support its arguments on appeal. AT&T requests the Board deny the appeal and uphold the Project's CUA Approval.

File No. 251098 – Appeal of Conditional Use Authorization
Proposed 350 Amber Drive Project (Case No. 2024-0004318CUA)
December 3, 2025
Page 22

ATTACHMENT A
Updated Site Plans

T-1



This Site Operated by:
AT&T MOBILITY
5001 EXECUTIVE PARKWAY
SAN RAMON, CA 94583
IN CASE OF FIRE AND THE NEED FOR SHUTDOWN
TO ACTIVATE ANTENNAS CALL THE
FOLLOWING NUMBER:
For 24 Hour Emergency Contact and Access Please Call:
(800) 638-2822

Reference Site#: CCL05350
Site Address: 350 AMBER DRIVE, SAN FRANCISCO, CA 94131

FOR FUEL & OTHER
ENVIRONMENTAL
EMERGENCIES
CALL EH&S
1-800-566-9347
1-800-KNOW-EHS

**WARNING**
CANCER AND REPRODUCTIVE HARM
WWW.P65WARNINGS.CA.GOV

**AVERTISSEMENT**
CANCER ET EFFET NOCIF SUR LA REPRODUCTION
WWW.P65WARNINGS.CA.GOV

**AVERTISSEMENT**
PRODUCE CANCER Y DAÑOS REPRODUCTIVOS
WWW.P65WARNINGS.CA.GOV


- SIGNAGE AND STRIPING INFORMATION**
- THE FOLLOWING INFORMATION IS A GUIDELINE WITH RESPECT TO PREVAILING STANDARDS LIMITING HUMAN EXPOSURE TO RADIO FREQUENCY ENERGY AND SHOULD BE USED AS SUCH. IF THE SITE'S EMF REPORT OR ANY LOCAL, STATE OR FEDERAL GUIDELINES OR REGULATIONS SHOULD BE IN CONFLICT WITH ANY PART OF THESE NOTES OR PLANS, THE MORE RESTRICTIVE GUIDELINE OR REGULATION SHALL BE FOLLOWED AND OVERRIDE THE LESSER.
 - THE PUBLIC LIMIT OF RF EXPOSURE ALLOWED BY AT&T IS 1mW/cm² AND THE OCCUPATIONAL LIMIT OF RF EXPOSURE ALLOWED BY AT&T IS 5mW/cm².
 - IF THE BOTTOM OF THE ANTENNA IS MOUNTED (8) EIGHT FEET ABOVE THE GROUND OR WORKING PLATFORM LINE OF THE PERSONAL COMMUNICATION SYSTEM (PCS) AND DOES NOT EXCEED THE PUBLIC LIMIT OF RF EXPOSURE LIMIT THEN NO STRIPING OR BARRICADES SHOULD BE NEEDED.
 - IF THE PUBLIC LIMIT OF RF EXPOSURE ON THE SITE IS EXCEEDED AND THE AREA IS PUBLICLY ACCESSIBLE (e.g. ROOF ACCESS DOOR THAT CANNOT BE LOCKED, OR FIRE EGRESS) THEN BOTH BARRICADES AND STRIPING SHALL BE PLACED AROUND THE ANTENNAS. THE EXACT EXTENT OF THE BARRICADES AND STRIPING SHALL BE DETERMINED BY THE EMF REPORT FOR THE SITE DONE BEFORE OR SHORTLY AFTER COMPLETION OF THE SITE CONSTRUCTION. USE THE PLANS AS A GUIDELINE FOR PLACEMENT OF SUCH BARRICADES AND STRIPING.
 - IF THE PUBLIC LIMIT OF RF EXPOSURE ON THE SITE IS EXCEEDED AND THE AREA IS PUBLICLY ACCESSIBLE (e.g. ROOF ACCESS DOOR THAT CANNOT BE LOCKED, OR FIRE EGRESS) THEN BOTH BARRICADES AND STRIPING SHALL BE PLACED AROUND THE ANTENNAS. THE EXACT EXTENT OF THE BARRICADES AND STRIPING SHALL BE DETERMINED BY THE EMF REPORT FOR THE SITE DONE BEFORE OR SHORTLY AFTER COMPLETION OF THE SITE CONSTRUCTION. USE THE PLANS AS A GUIDELINE FOR PLACEMENT OF SUCH BARRICADES AND STRIPING.
 - ALL TRANSMIT ANTENNAS REQUIRE A THREE LANGUAGE WARNING SIGN WRITTEN IN ENGLISH, SPANISH, AND CHINESE. THIS SIGN SHALL BE PROVIDED TO THE CONTRACTOR BY THE AT&T CONSTRUCTION PROJECT MANAGER AT THE TIME OF CONSTRUCTION. THE LARGER SIGN SHALL BE PLACED IN PLAIN SIGHT AT ALL ROOF ACCESS LOCATIONS AND ON ALL BARRICADES. THE SMALLER SIGN SHALL BE PLACED ON THE ANTENNA ENCLOSURES IN A MANNER THAT IS EASILY SEEN BY ANY PERSON ON THE ROOF. WARNING SIGNS SHALL COMPLY WITH ANSI Z39.2 COLOR, SYMBOL, AND CONTENT CONVENTIONS. ALL SIGNS SHALL HAVE AT&T'S NAME AND THE COMPANY CONTACT INFORMATION (e.g. TELEPHONE NUMBER) TO ARRANGE FOR ACCESS TO THE RESTRICTED AREAS. THIS TELEPHONE NUMBER SHALL BE PROVIDED TO THE CONTRACTOR BY THE AT&T CONSTRUCTION PROJECT MANAGER AT THE TIME OF CONSTRUCTION.
 - PHOTOS OF ALL STRIPING, BARRICADES AND SIGNAGE SHALL BE PART OF THE CONTRACTORS CLOSE OUT PACKAGE & SHALL BE TURNED INTO THE AT&T CONSTRUCTION PACKAGE & SHALL BE TURNED INTO THE AT&T CONSTRUCTION MANAGER AT THE END OF CONSTRUCTION. STRIPING SHALL BE DONE WITH FADE RESISTANT YELLOW SAFETY PAINT IN A CROSS-HATCH PATTERN AS DETAILED BY THE CONSTRUCTION DRAWINGS. ALL BARRICADES SHALL BE MADE OF AN RF FRIENDLY MATERIAL SO AS NOT TO BLOCK OR INTERFERE WITH THE OPERATION OF THE ANTENNAS. BARRICADES SHALL BE PAINTED WITH FADE RESISTANT YELLOW SAFETY PAINT. THE CONTRACTOR SHALL PROVIDE WITH ALL RF FRIENDLY BARRICADES NEEDED, & SHALL PROVIDE THE AT&T CONSTRUCTION PROJECT MANAGER WITH A DETAILED SHOP DRAWING OF EACH BARRICADES. UPON CONSTRUCTION COMPLETION.

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY


350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR



5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:



NEXTEGE NETWORKS
1355 WINDWARD CONCOURSE, SUITE 410
ALPHARETTA, GEORGIA 30005

AT&T SITE NO: CCL05350

PROJECT NO: _____

DRAWN BY: R. CRUZ

CHECKED BY: R. MARTINEZ

APPROVED BY: C. WENER

ISSUE STATUS			
REV.	DATE	DESCRIPTION	BY
0	01/30/24	90% ZONING	R.C.
0	11/18/25	100% ZONING	R.C.

LICENSURE:

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

SHEET TITLE:

SITE SIGNAGE

SHEET NUMBER

T-2

FENCE COMPOUND SIGNAGE

SCALE: NONE 11

YELLOW EH&S SIGN

SCALE: NONE 7

PROP 65

SCALE: NONE 5

DANGER

NO TRESPASSING

INFORMATION

Federal Communications Communication Tower
Registration Number

1 2 3 4 5 6 7

Posted in accordance with Federal Communications
Commission rules and antenna tower registration
47CFR 17.4 (g).

DIESEL FUEL

COMBUSTIBLE
NO SMOKING
NO OPEN FLAMES

FUEL TANK CAPACITY 150 GALS

15'

2

15'

1

0

FENCED COMPOUND SIGNAGE

SCALE: NONE 14

FCC ASR SIGNAGE

SCALE: NONE 10

FUEL TYPE SIGN

SCALE: NONE 6

NFPA 704 HAZARD DIAMOND SIGN

SCALE: NONE 4

GENERAL NOTES

SCALE: NONE 2

NOTICE

AUTHORIZED PERSONNEL ONLY

Property of AT&T

Authorized Personnel Only


No Trespassing
Violators will be prosecuted

In case of emergency, or prior to performing maintenance on this site, call (800) 638-2822 and reference cell site number CCL05350

- NOTE:
- CONTRACTOR SHALL INSTALL ALL INFORMATION SIGNAGE IN ACCORDANCE W/ AT&T WIRELESS DOCUMENT #03-0074, RF EXPOSURE POLICY AND RF SAFETY COMPLIANCE PROGRAM, LATEST EDITION.
 - CONTRACTOR SHALL CONTACT AT&T R-RFSC FOR INFORMATION ON MPE LEVELS AND INSTRUCTIONS ON LEVEL AND LOCATION OF SIGNAGE.

8"

CAUTION




On this tower:
Beyond This Point you are entering an area where radio frequency (RF) fields may exceed the FCC General Population Exposure Limits. Contact AT&T at 800-638-2822 and follow their instructions prior to performing any maintenance or repairs above this point. Personal climbing this tower should be trained for working in RF environment and used a personal RF monitoring if working near active antennas.

12'

8"

CAUTION




AT&T operates antennas at this site. Beyond This Point you are entering an area where radio frequency (RF) fields may exceed the FCC General Population Exposure Limits. Follow safety guidelines for working in an RF environment. Contact AT&T at 800-638-2822 and follow their instructions prior to performing any maintenance or repairs above this point.

12'

8"

NOTICE



AT&T operates antennas at this site. Beyond This Point you are entering an area where radio frequency (RF) fields may exceed the FCC General Population Exposure Limits. Follow safety guidelines for working in an RF environment. Contact AT&T at 800-638-2822 and follow their instructions prior to performing any maintenance or repairs above this point.

12'

DOOR / EQUIPMENT SIGN

SCALE: NONE 13

GATE SIGNAGE

SCALE: NONE 9

0

3

2

ACID

Property of AT&T

Authorized Personnel Only

In case of emergency, or prior to performing maintenance on this site, call (800) 638-2822 and reference cell site number CCL05350

NFPA HAZARD SIGN

SCALE: NONE 12

CABINET DOORS SIGNAGE

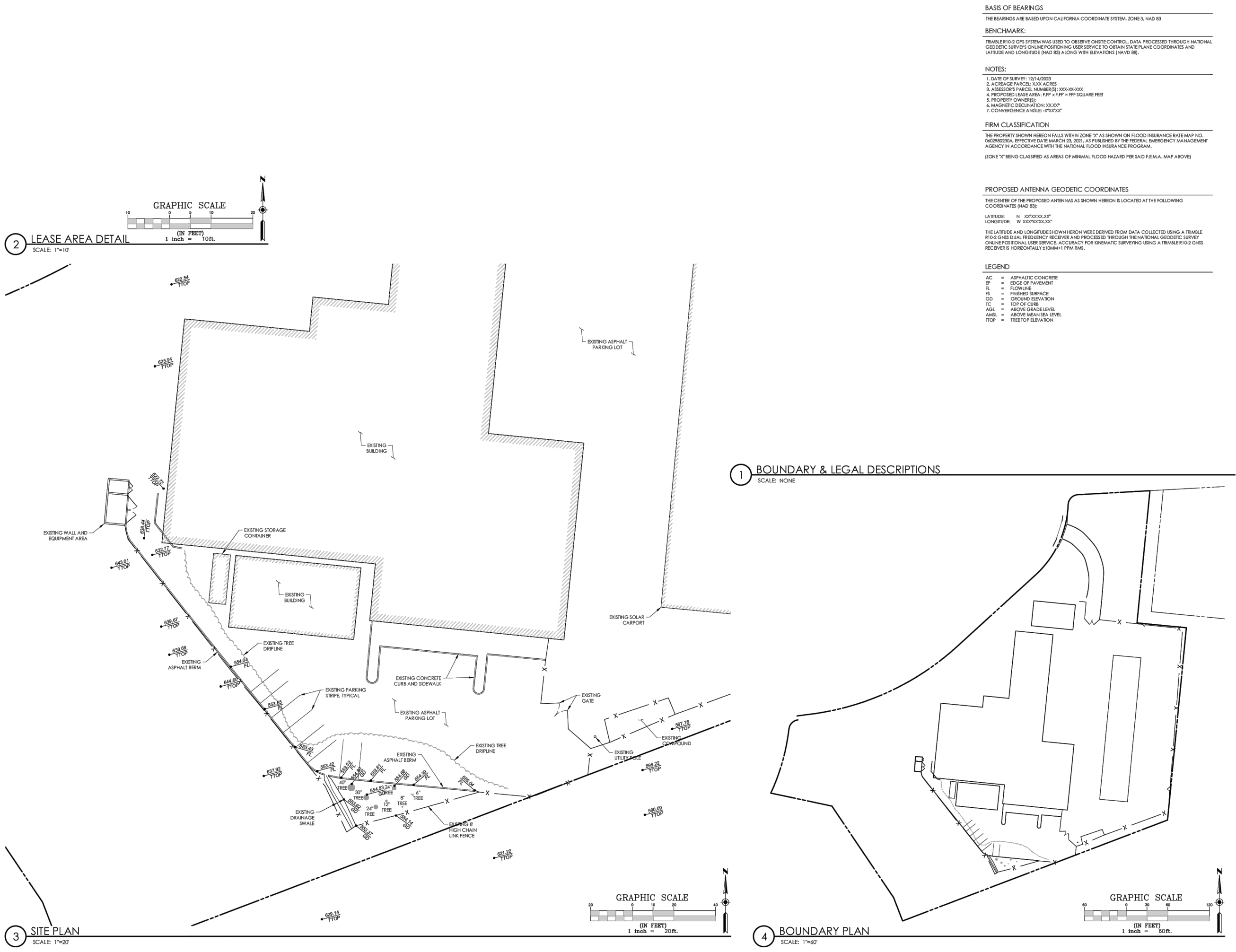
SCALE: NONE 8

CAUTION AND WARNING SIGN

SCALE: NONE 3

NOTICE SIGN

SCALE: NONE 1





5001 EXECUTIVE PARKWAY
SAN RAMON, CA 94583

PROJECT INFORMATION:

CCL05350

350 AMBER DR
SAN FRANCISCO, CA

CURRENT ISSUE DATE:

01/05/2024

ISSUED FOR:

90% SURVEY

REV.: -DATE: -DESCRIPTION: -BY:

REV.	DATE	DESCRIPTION	BY

COORDINATING ARCHITECT:



OMNI DESIGN
INCORPORATED
ARCHITECTURE | ENGINEERING | SURVEYING

1326 Choma Street, San Luis Obispo, CA 93401
Office: 805.544.9700 www.omnidesign.us

SEAL:



CONSULTANT:



DRAWN BY: _____ CHK.: _____ APV.: _____

DRAWN BY	CHK.	APV.
MWM	MWM	MWM

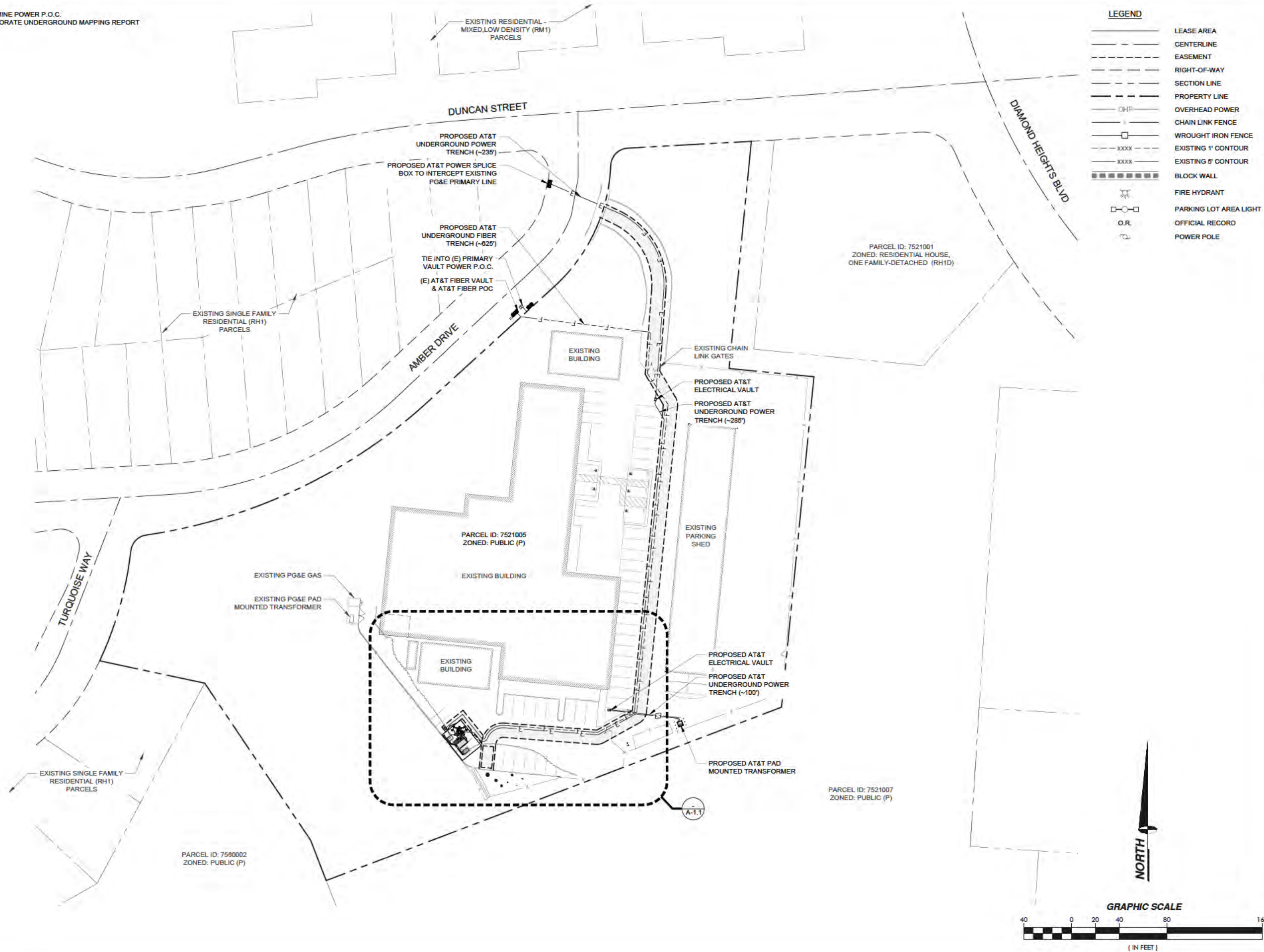
SHEET TITLE:

LEASE AREA DETAIL
SITE & BOUNDARY PLAN

SHEET NUMBER: _____ REVISION: _____

SHEET NUMBER	REVISION
C-1	1180-10XX

- NOTE:
1. PG&E TO DETERMINE POWER P.O.C.
2. NEED TO INCORPORATE UNDERGROUND MAPPING REPORT



OVERALL SITE PLAN

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

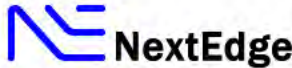
350 AMBER DRIVE
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PREPARED FOR



5005 EXECUTIVE PARKWAY
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VENDOR:



NEXTEDGE NETWORKS
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AT&T SITE NO: CCL05350

PROJECT NO:

DRAWN BY: R. CRUZ

CHECKED BY: R. MARTINEZ

APPROVED BY: C. WENER

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
0	01/30/24	90% ZONING	R.C.
0	11/18/25	100% ZONING	R.C.

LICENSURE:

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ENGINEER, TO ALTER THIS DOCUMENT.

SHEET TITLE:

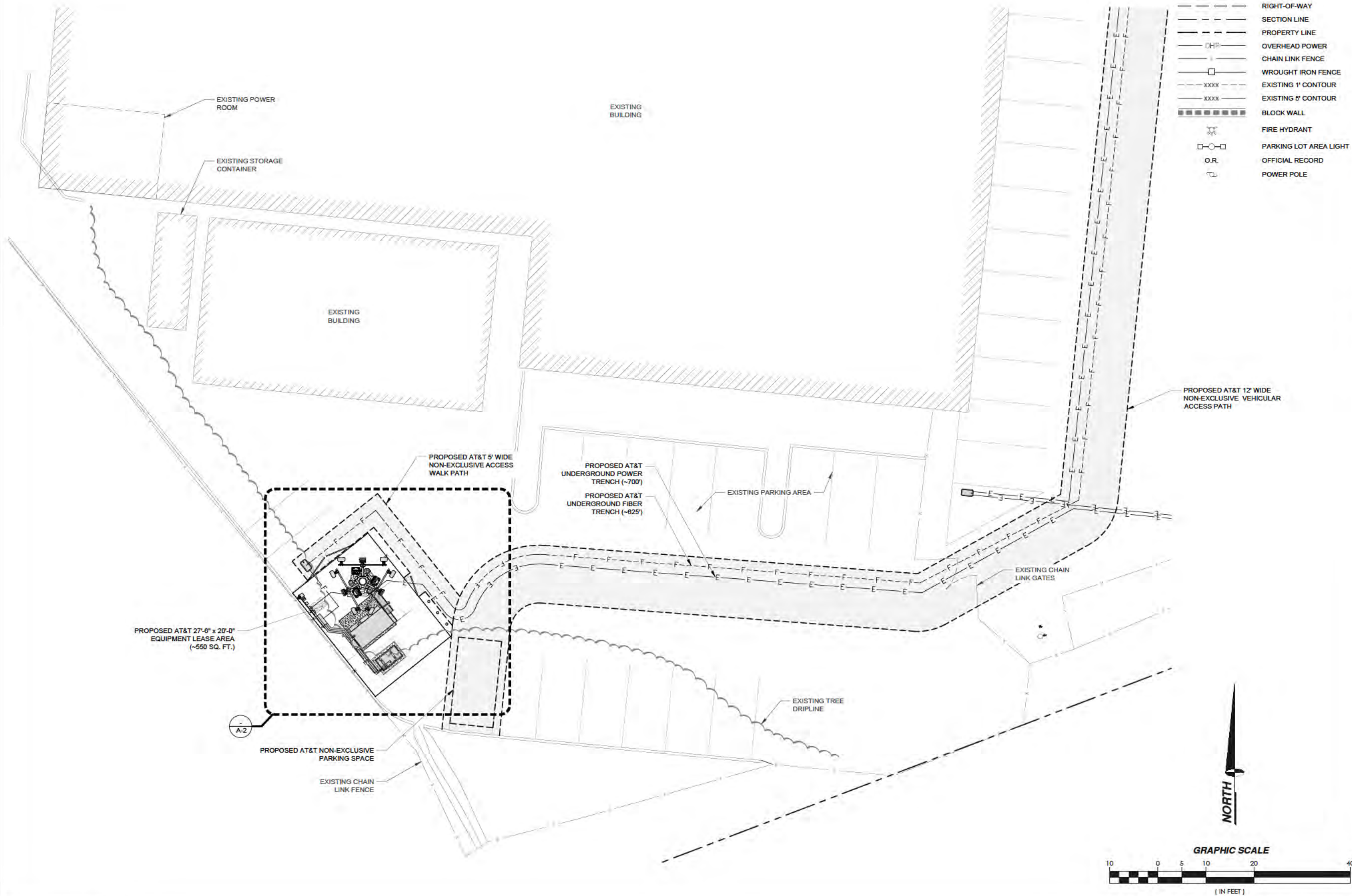
OVERALL SITE
PLAN

SHEET NUMBER

A-1

11" X 17" SCALE 24" X 36" SCALE
1" = 80' 1" = 40'

- NOTE:
1. PG&E TO DETERMINE POWER P.O.C.
2. NEED TO INCORPORATE UNDERGROUND MAPPING REPORT



ENLARGED SITE PLAN

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

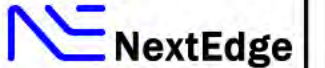
350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR



5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:



NEXTEGE NETWORKS
1355 WINDWARD CONCOURSE, SUITE 410
ALPHARETTA, GEORGIA 30005

AT&T SITE NO: CCL05350

PROJECT NO: _____

DRAWN BY: R. CRUZ

CHECKED BY: R. MARTINEZ

APPROVED BY: C. WENER

ISSUE STATUS

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0	11/18/25	100% ZONING	R.C.

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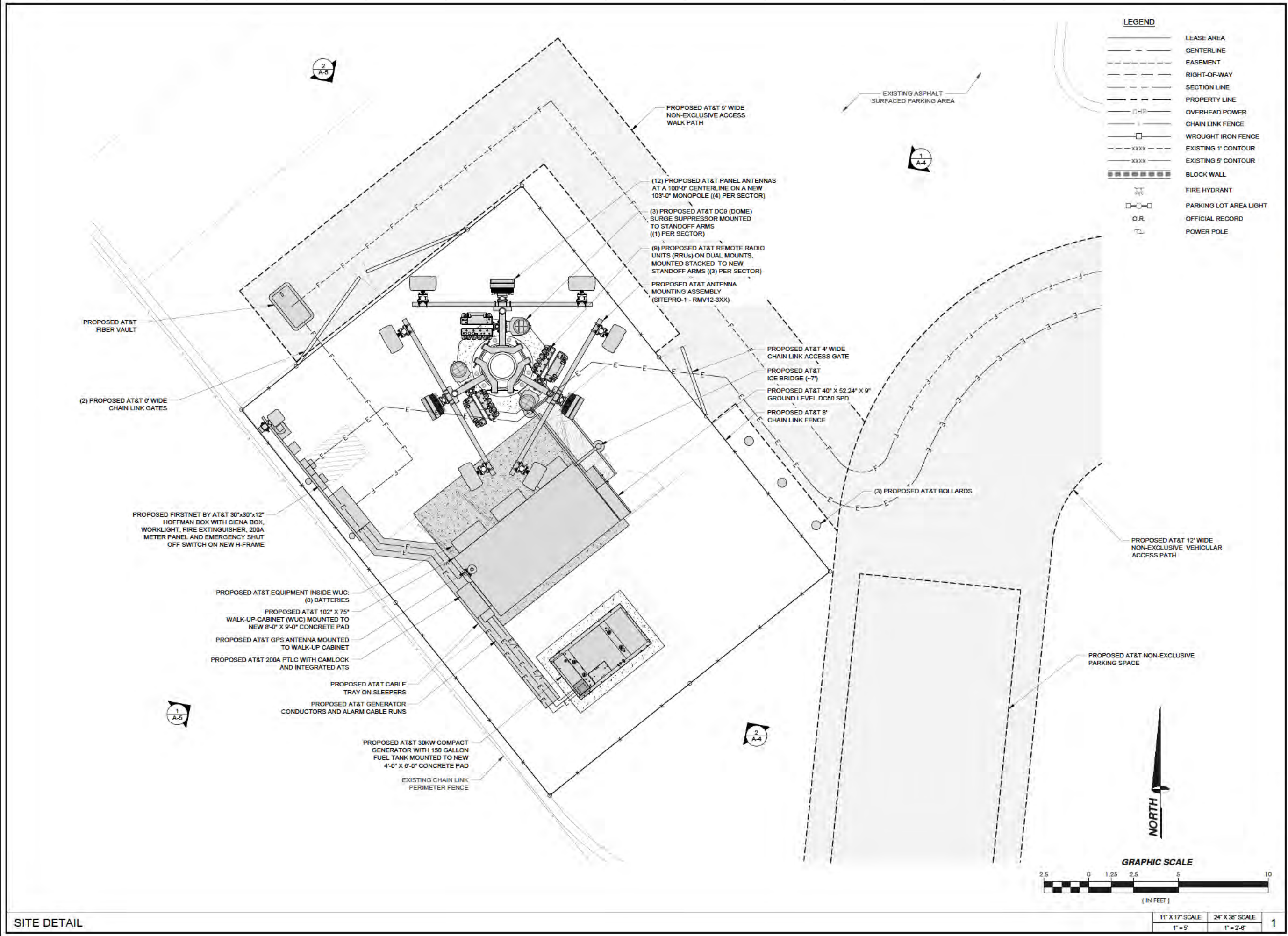
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SHEET TITLE:

ENLARGED SITE
PLAN

SHEET NUMBER

A-1.1



SITE DETAIL

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR



5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:



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AT&T SITE NO: CCL05350

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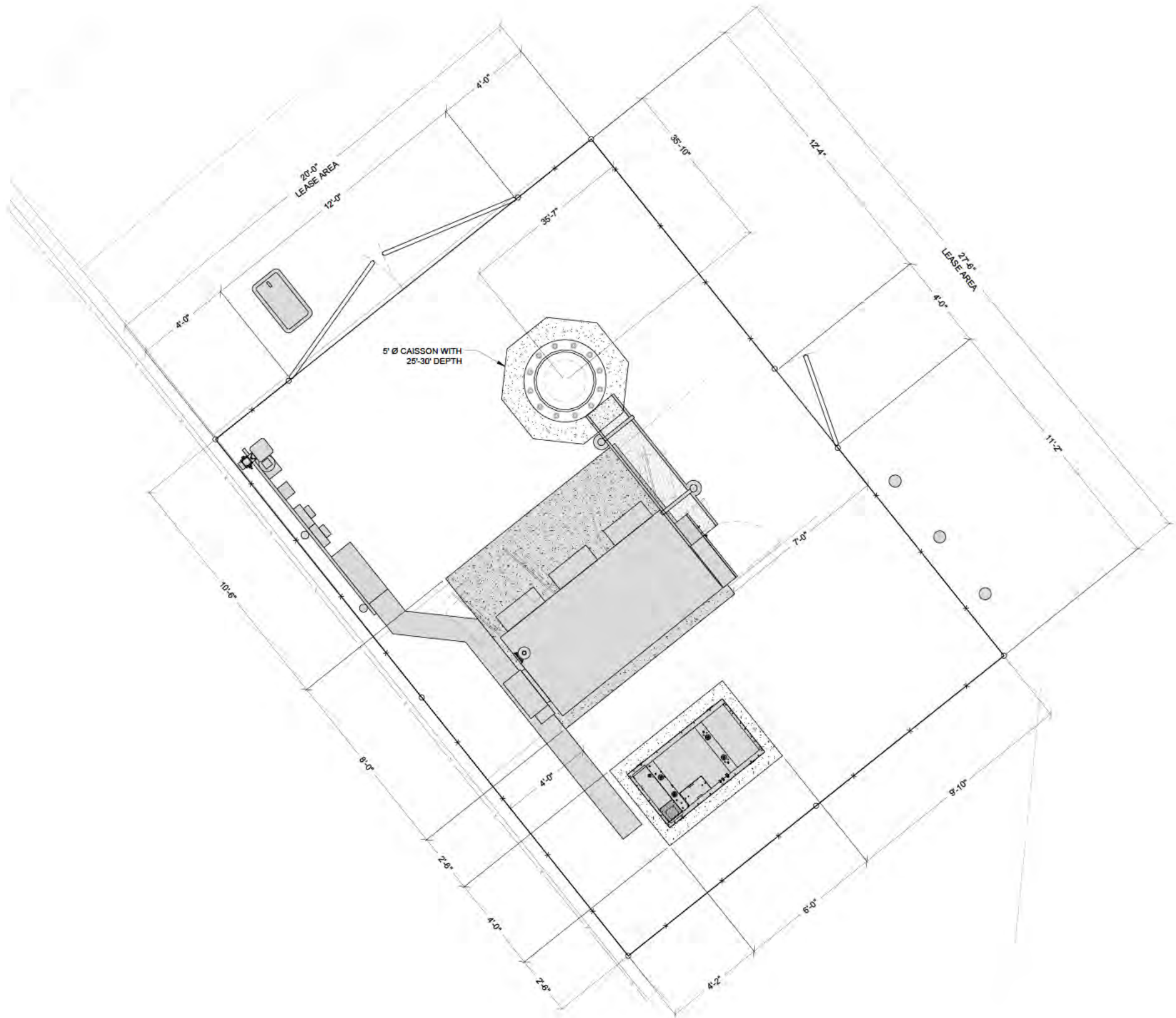
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SITE DETAIL

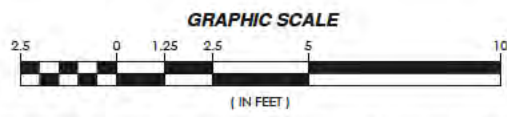
SHEET NUMBER

A-2



- LEGEND**
- LEASE AREA
 - CENTERLINE
 - EASEMENT
 - RIGHT-OF-WAY
 - SECTION LINE
 - PROPERTY LINE
 - OVERHEAD POWER
 - CHAIN LINK FENCE
 - WROUGHT IRON FENCE
 - EXISTING 1' CONTOUR
 - EXISTING 5' CONTOUR
 - BLOCK WALL
 - FIRE HYDRANT
 - PARKING LOT AREA LIGHT
 - O.R. OFFICIAL RECORD
 - POWER POLE

NOTE:
PROPOSED ANTENNAS AND TOWER
MOUNTED APPURTENANCES NOT
SHOWN FOR CLARITY



SITE DETAIL WITH DIMENSIONS

11" X 17" SCALE 24" X 36" SCALE
1" = 5' 1" = 2'-6" 1

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR

at&t

5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:

NextEdge

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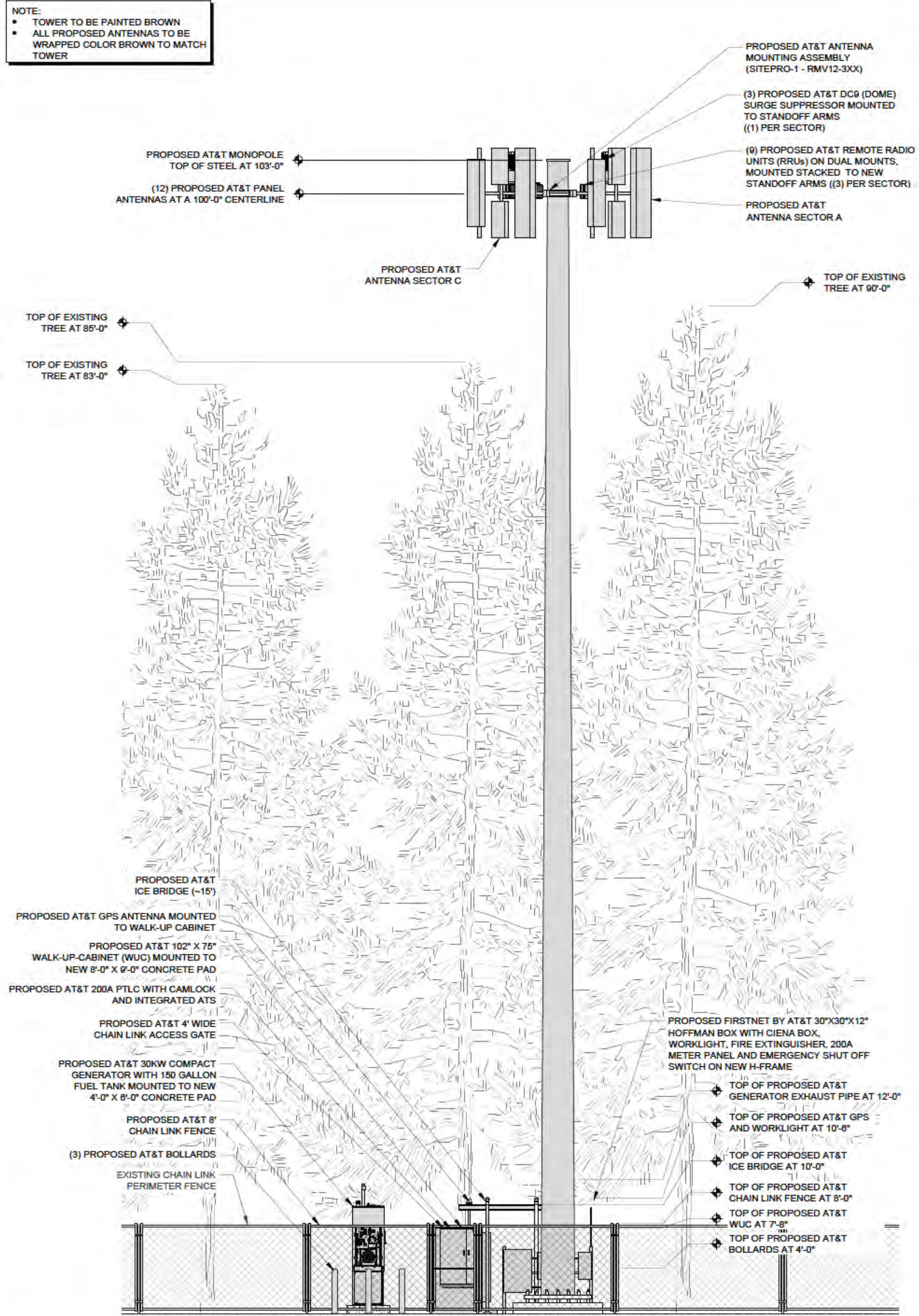
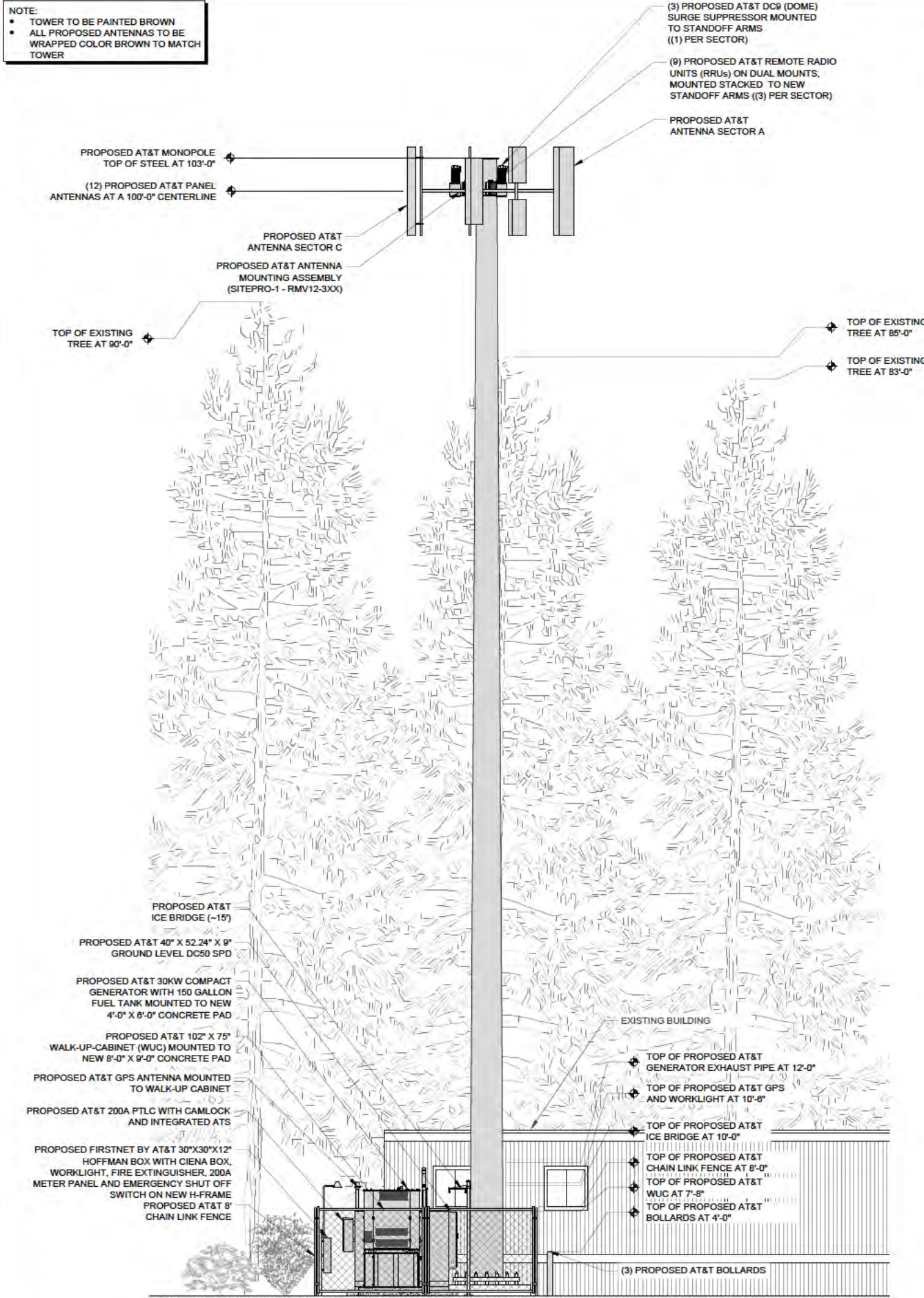
SITE DETAIL WITH
DIMENSIONS

SHEET NUMBER

A-2.1

NOTE:
• TOWER TO BE PAINTED BROWN
• ALL PROPOSED ANTENNAS TO BE WRAPPED COLOR BROWN TO MATCH TOWER

NOTE:
• TOWER TO BE PAINTED BROWN
• ALL PROPOSED ANTENNAS TO BE WRAPPED COLOR BROWN TO MATCH TOWER



SOUTHEAST ELEVATION

11" X 17" SCALE 24" X 36" SCALE
1" = 12' 1" = 6'

2

NORTHEAST ELEVATION

11" X 17" SCALE 24" X 36" SCALE
1" = 12' 1" = 6'

1

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
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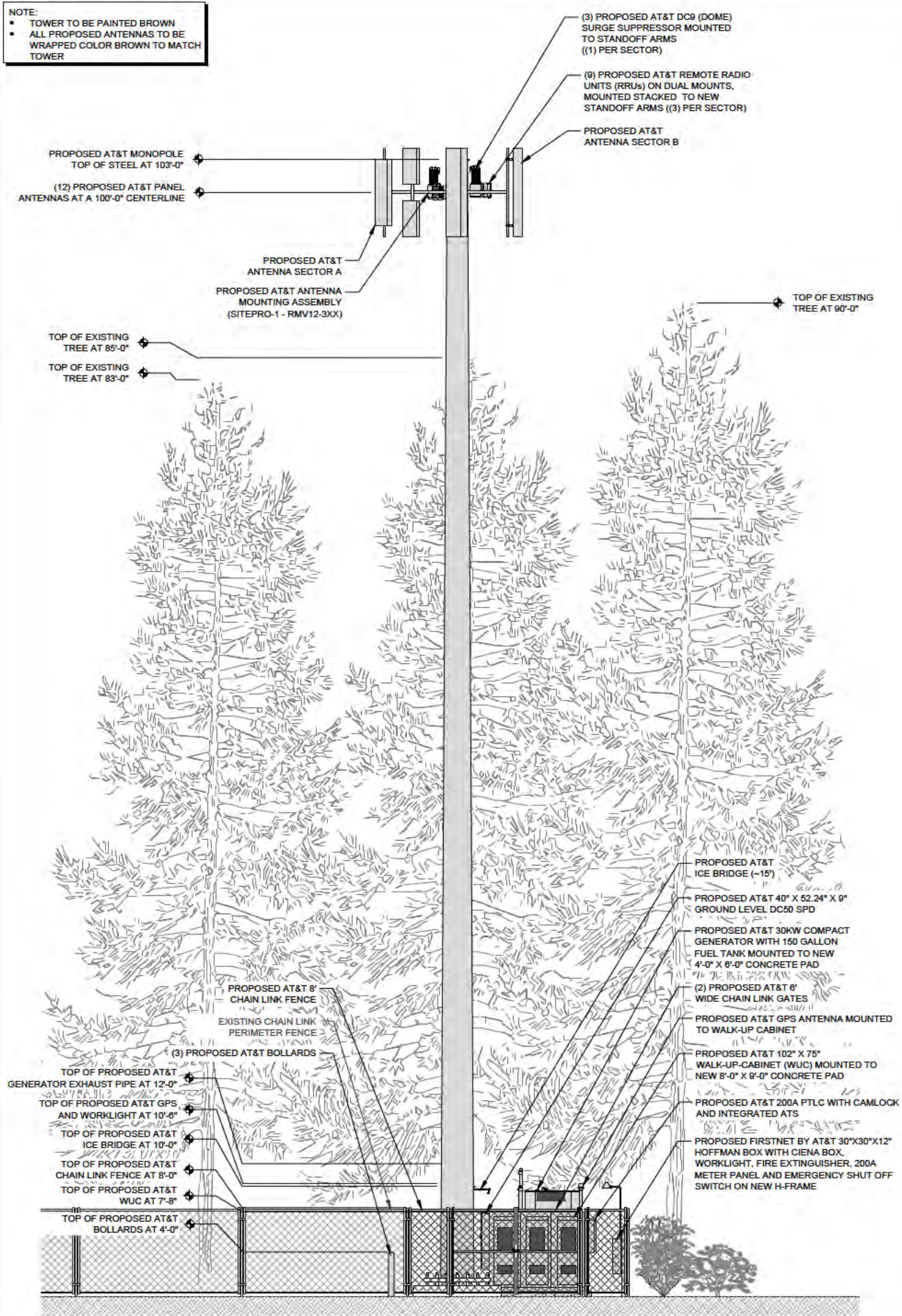
SHEET TITLE:

NORTHEAST AND
SOUTHEAST
ELEVATIONS

SHEET NUMBER

A-4

NOTE:
• TOWER TO BE PAINTED BROWN
• ALL PROPOSED ANTENNAS TO BE WRAPPED COLOR BROWN TO MATCH TOWER



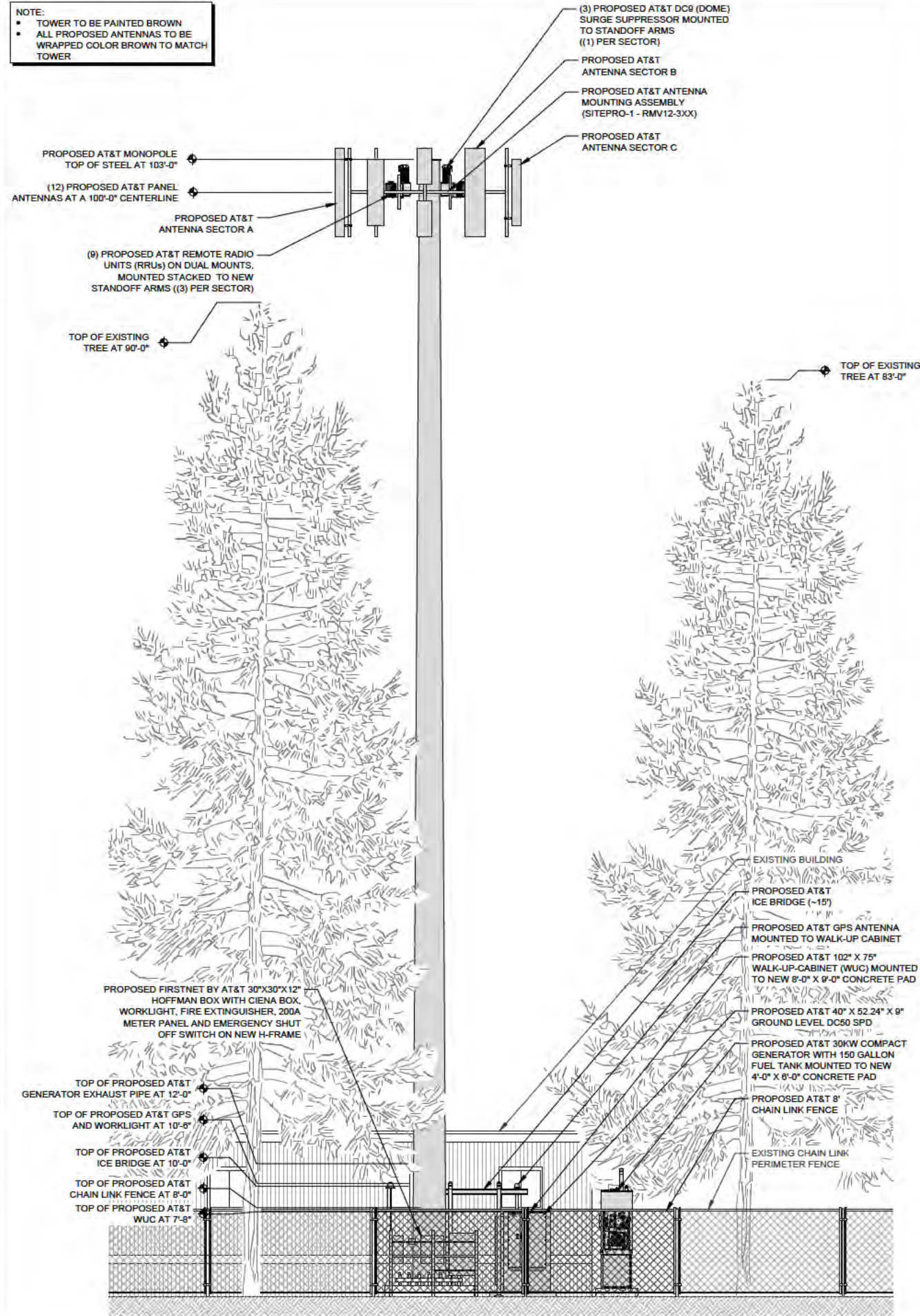
NORTHWEST ELEVATION

11" X 17" SCALE 24" X 36" SCALE
1" = 10' 1" = 5'

2

SOUTHWEST ELEVATION

NOTE:
• TOWER TO BE PAINTED BROWN
• ALL PROPOSED ANTENNAS TO BE WRAPPED COLOR BROWN TO MATCH TOWER



11" X 17" SCALE 24" X 36" SCALE
1" = 10' 1" = 5'

1

PROJECT INFORMATION:

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SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR



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SAN RAMON, CALIFORNIA 94583

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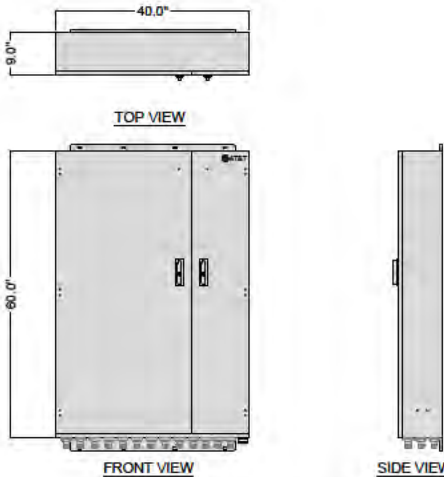
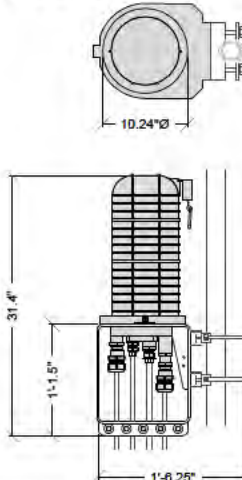
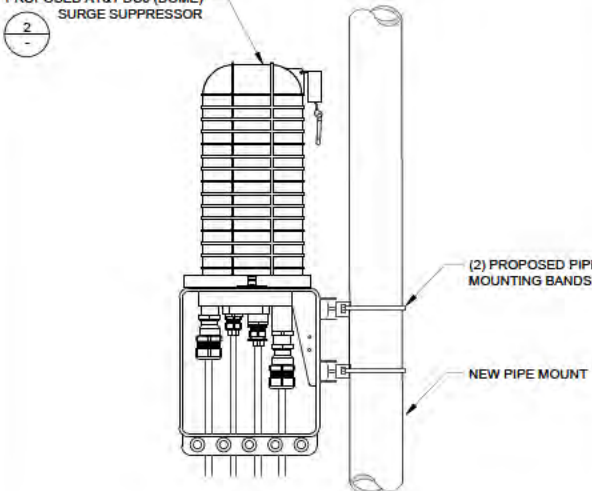
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SHEET TITLE:

SOUTHWEST AND
NORTHWEST
ELEVATIONS

SHEET NUMBER

A-5

									<div>MANUFACTURER: RAYCAP</div> <div>MODEL: DC50-48-60-66-50F</div> <div>SIZE (H x W x D): 60.0" x 40.0" x 9.0"</div> <div>WEIGHT: — LBS</div> <div></div>					
NOT USED	SCALE: NONE	12	NOT USED	SCALE: NONE	9	NOT USED	SCALE: NONE	6	DC50 SURGE SUPPRESSOR	SCALE: NONE	3			
									<div><u>SPECIFICATIONS</u></div> <div>MFG: RAYCAP</div> <div>MODEL: DC6-48-60-24-9C-EV</div> <div>SURGE PROTECTION SOLUTIONS</div> <div>DIMENSIONS: L18.28" X W10.24" X H31.4</div> <div>WEIGHT: 26.2 LBS</div> <div></div>					
NOT USED	SCALE: NONE	11	NOT USED	SCALE: NONE	8	NOT USED	SCALE: NONE	5	SURGE SUPPRESSION (SQUID)	SCALE: NONE	2			
									<div>PROPOSED AT&T DC9 (DOME) SURGE SUPPRESSOR</div> <div></div>					
NOT USED	SCALE: NONE	10	NOT USED	SCALE: NONE	7	NOT USED	SCALE: NONE	4	SURGE SUPPRESSOR ATTACHMENT	SCALE: NONE	1			

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR



5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:



NEXTEGE NETWORKS
1355 WINDWARD CONCOURSE, SUITE 410
ALPHARETTA, GEORGIA 30005

AT&T SITE NO: CCL05350

PROJECT NO: _____

DRAWN BY: R. CRUZ

CHECKED BY: R. MARTINEZ

APPROVED BY: C. WENER

ISSUE STATUS

[illegible]

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SHEET TITLE:

EQUIPMENT DETAILS

SHEET NUMBER

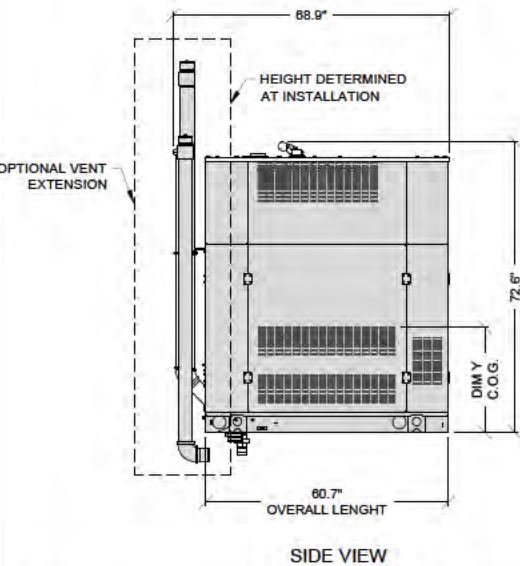
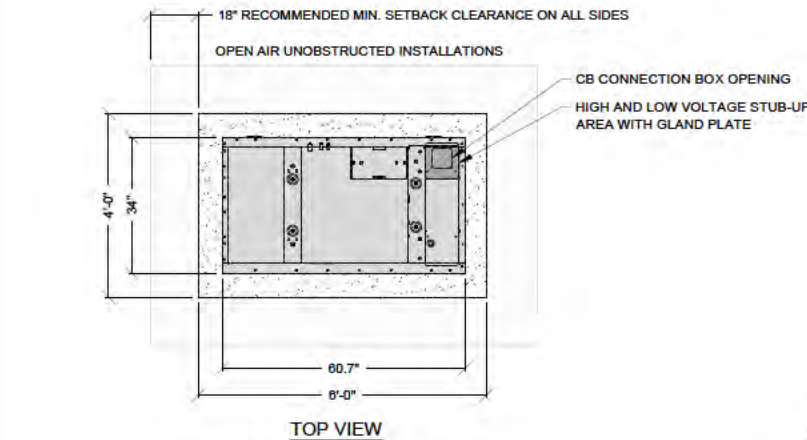
D-2

Notes:

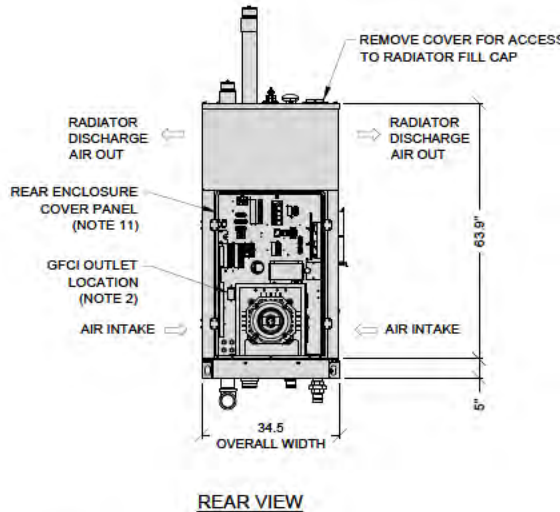
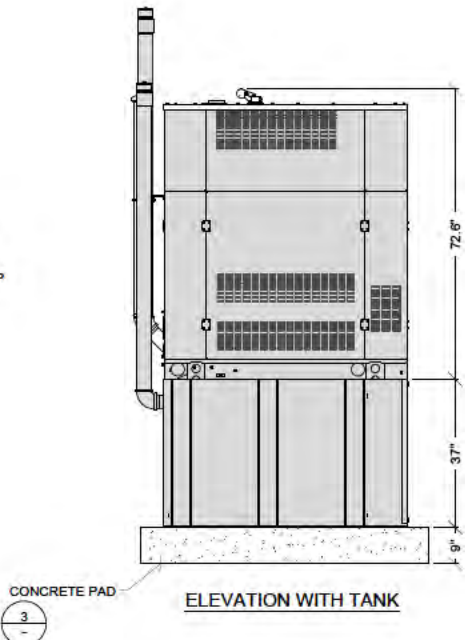
- CONTROL PANEL, (5 AMP BATTERY CHARGER INSIDE).
- 120V, 20A GFCI, 15A OUTLET (OPTIONAL).
- CONNECTION POINTS FOR CONTROL WIRES PROVIDED IN THE LOW VOLTAGE CONNECTION BOX (USE LOW VOLTAGE STUB-UP AREA).
- BATTERY (12 VOLT NEGATIVE GROUND SYSTEM).
- MAIN LINE CIRCUIT BREAKER (MLCB), AC LOAD LEADS.
- MAIN LINE CIRCUIT BREAKER INFORMATION:
-SEE SPECIFICATION SHEET OR OWNERS MANUAL
-ACCESSIBLE THROUGH CUSTOMER ACCESS ASSEMBLY DOOR ON REAR OF GENERATOR (DIMENSIONS MAY VARY DUE TO UNIT CONFIGURATION)
- CENTER OF GRAVITY AND WEIGHT MAY CHANGE DUE TO UNIT OPTIONS.
FOR WEIGHT AND CENTER OF GRAVITY DATA SEE SHEET 3
- ENGINE SERVICE CONNECTIONS:
INLET DIESEL = 1/4" NPT
RETURN DIESEL = 1/4" NPT
OIL DRAIN = 1/2" NPT
RADIATOR DRAIN = 1/4" NPT
FLEX PIPE OUTLET = 2" ID
EXHAUST OUTLET = 2" ID

***** SEE GENERATOR SIZING GUIDE FOR FUEL PIPE SIZING TO SUIT APPLICATION *****

- GENERATOR SET MUST BE INSTALLED SUCH THAT FRESH COOLING AIR IS AVAILABLE AND DISCHARGE AIR FROM THE RADIATOR IS NOT RECIRCULATED.
- BOTTOM OF GENERATOR SET MUST BE ENCLOSED TO PREVENT PEST INTRUSION AND RECIRCULATION OF DISCHARGE AIR AND/OR IMPROPER COOLING AIR FLOW.
- EXHAUST SYSTEM MAXIMUM BACK PRESSURE = 10" H2O (ADDITIONAL).
- REMOVE THE REAR ENCLOSURE COVER PANEL TO ACCESS THE STUB-UP AREAS AS FOLLOWS:
-HIGH VOLTAGE CONNECTION INCLUDING AC LOAD LEAD CONDUIT CONNECTION
-NEUTRAL CONNECTION, BATTERY CHARGER 120V AC (0.5 AMP MAX) CONNECTION.
-LOW VOLTAGE CONNECTION INCLUDING TRANSFER SWITCH CONTROL WIRES.
- BOLTS OR STUDS USED TO MOUNT UNIT TO PAD SHALL BE 5/8" - 11 GRADE 5.
- ALLOW SUFFICIENT ROOM ON ALL SIDES OF THE GENERATOR FOR MAINTENANCE AND SERVICING. THIS UNIT MUST BE INSTALLED IN ACCORDANCE WITH CURRENT APPLICABLE NFPA 37 AND NFPA 70 STANDARDS AS WELL AS ANY OTHER FEDERAL STATE, AND LOCAL CODES.
- FOR INSTALLATIONS WITH AIRFLOW OBSTRUCTIONS ON ANY SIDE OF THE GENERATOR SEE SUPPORTING DOCUMENTATION FOR AIR FLOW CLEARANCE IN SUBMITTAL DOCUMENTS.



ENCLOSURE TYPE					
MODEL	VOLTAGE	WEIGHT	CENTER OF GRAVITY DIM X	CENTER OF GRAVITY DIM Y	CENTER OF GRAVITY DIM Z
SDC030	240V, 1Ø	1736.2 KG (1623 LBS)	784 (30.9)	765 (30.1)	444 (17.5)
SDC030	208V, 240V, 480V, 600V, 3Ø				



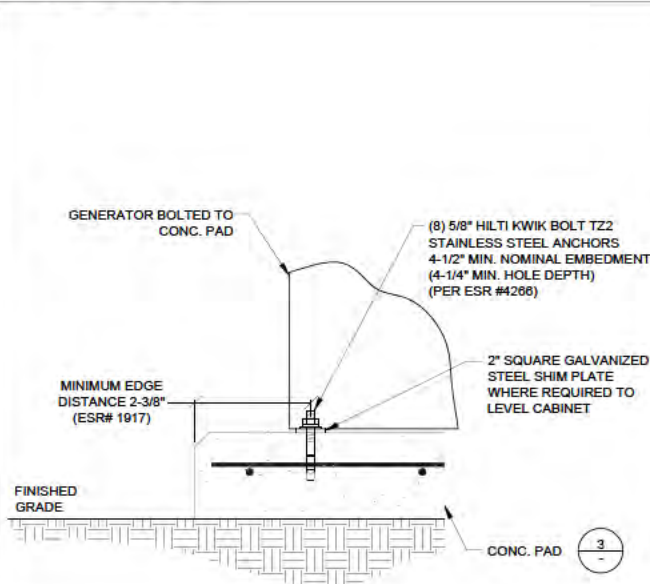
GENERAC SDC030 30KW GENERATOR WITH 150 GALLON TANK

SCALE:
NONE

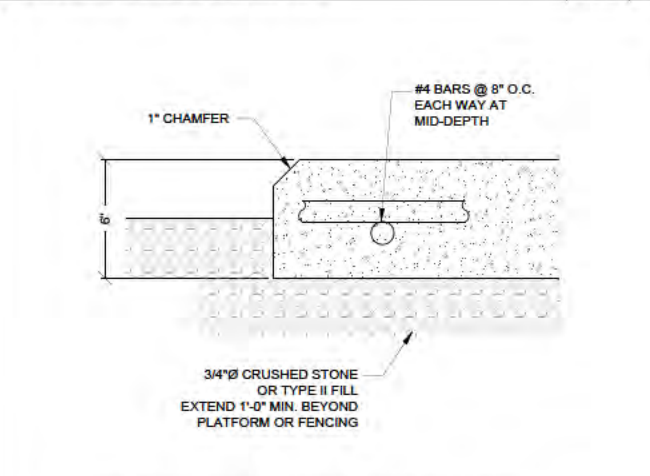
5

CONCRETE PAD

STUB-UP VIEW



EQUIPMENT ANCHORAGE



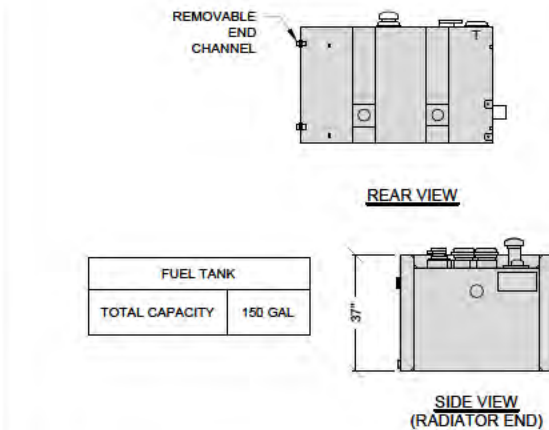
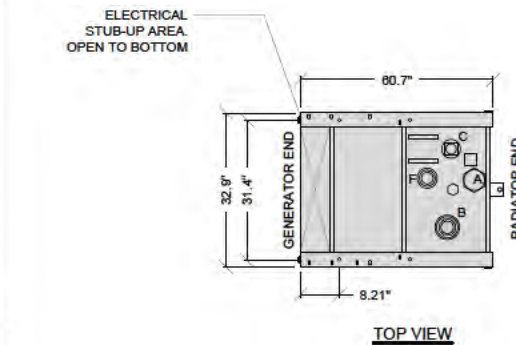
CONCRETE SHALL HAVE A MINIMUM 28 DAY COMPRESSIVE STRENGTH OF 3000 PSI. REINFORCING STEEL SHALL CONFORM TO ASTM A615.

SCALE:
NONE

3

150 GALLON TANK DETAIL

- TANK FITTINGS
- A" NPT EMERGENCY VENT FITTING PER NFPA 30 WITH VENT CAPS (QTY 2)
 - 4" NPT FUEL FILL FITTING BUSHED TO 2" NPT WITH LOCKABLE FILL CAP AND 2" RISER
 - 2" NPT FUEL LEVEL GAUGE FITTING W/ DIRECT READING MECHANICAL GAUGE
 - 2" NPT NORMAL VENT FITTING WITH MUSHROOM VENT CAP AND 5" RISER
 - 1/2" NPT FITTING FOR REMOVABLE ENGINE SUPPLY DIP TUBE (3/8" NPT FEMALE) WITH CHECK VALVE
 - 1/2" NPT FITTING FOR REMOVABLE FUEL RETURN DIP TUBE (3/8" NPT FEMALE)
 - 2" NPT FUEL LEVEL SENDING UNIT
 - 2" NPT FITTING FOR OPTIONAL SWITCH (INSTALL 2" NPT PIPE PLUG)
 - 2" NPT FOR FUEL IN BASIN SWITCH
 - 2" NPT FITTING FOR OPTIONAL SWITCH (INSTALL 2" NPT PIPE PLUG)



NOTES:
STUB-UP AREA FOR HIGH AND LOW VOLTAGE CONNECTIONS CIRCUIT BREAKER, NEUTRAL AND CUSTOMER CONNECTION OPENING.

FOR CONCRETE PAD ATTACHMENT USE 3/4" HILTI KWIK BOLT TZ STAINLESS STEEL ANCHORS 4-5/16" MIN EMBEDMENT (4-1/2" HOLE DEPTH) ESR-1917

SCALE:
NONE

SCALE:
NONE

1

PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR

at&t
5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

VENDOR:

NextEdge
NEXTEDGE NETWORKS
1355 WINDWARD CONCOURSE, SUITE 410
ALPHARETTA, GEORGIA 30005

AT&T SITE NO: CCL05350

PROJECT NO: _____

DRAWN BY: R. CRUZ

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APPROVED BY: C. WENER

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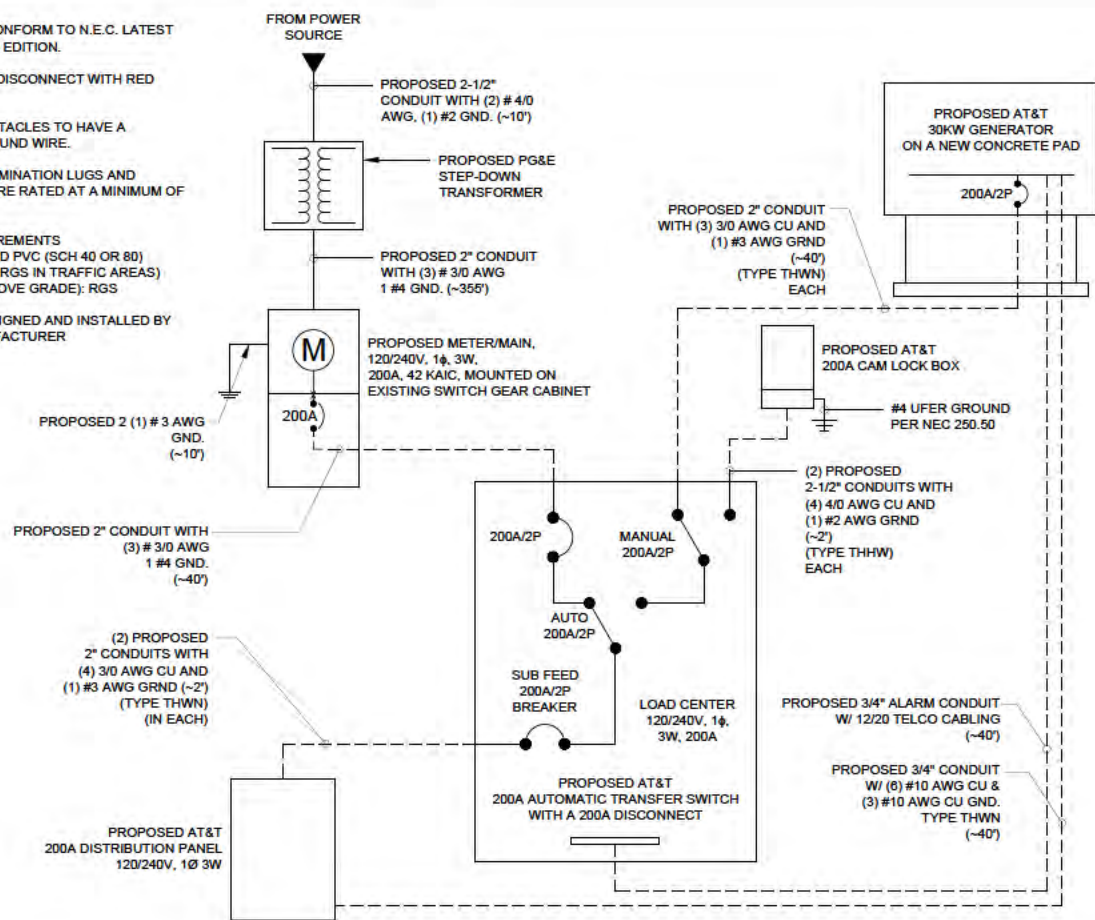
SHEET TITLE:

GENERATOR
DETAILS

SHEET NUMBER

D-3

- NOTES:
1. ALL WORK TO CONFORM TO N.E.C. LATEST STATE ADOPTED EDITION.
 2. LABEL SERVICE DISCONNECT WITH RED TAG
 3. ALL GFCI RECEPTACLES TO HAVE A DEDICATED GROUND WIRE.
 4. EQUIPMENT TERMINATION LUGS AND CONDUCTORS ARE RATED AT A MINIMUM OF 75°C.
 5. CONDUIT REQUIREMENTS
-UNDERGROUND PVC (SCH 40 OR 80)
-INDOOR: EMT (RGS IN TRAFFIC AREAS)
-OUTDOOR (ABOVE GRADE): RGS
 6. LIGHTING IS DESIGNED AND INSTALLED BY SHELTER MANUFACTURER



SINGLE LINE DIAGRAM

SCALE: NONE 4

1. UTILITY POINTS OF SERVICE AND WORK/MATERIALS SHOWN ARE BASED UPON PRELIMINARY INFORMATION PROVIDED BY THE UTILITY COMPANIES AND ARE FOR BID PURPOSES ONLY.
2. CONTRACTOR SHALL COORDINATE WITH UTILITY COMPANY FOR FINAL AND EXACT WORK/MATERIALS REQUIREMENTS AND CONSTRUCT TO UTILITY COMPANY ENGINEERING PLANS AND SPECIFICATIONS ONLY. CONTRACTOR SHALL FURNISH AND INSTALL ALL CONDUIT, PULL ROPE, CABLES, PULL BOXES, CONCRETE ENCASMENT OF CONDUIT (IF REQUIRED), TRANSFORMER PAD, BARRIERS, POLE RISERS, TRENCHING, BACK FILL, PAY ALL UTILITY COMPANY FEES AND INCLUDE ALL REQUIREMENTS IN SCOPE OF WORK.

ELECTRICAL CERTIFICATES

THE ENGINEER OF RECORD HAS PERFORMED ALL REQUIRED SHORT CIRCUIT CALCULATIONS AND THE AIC RATINGS INDICATED FOR EACH DEVICE IS ADEQUATE TO PROTECT THE EQUIPMENT AND THE ELECTRICAL SYSTEM.

THE ENGINEER OF RECORD HAS PERFORMED ALL REQUIRED VOLTAGE DROP CALCULATIONS AND ALL BRANCH CIRCUITS AND FEEDERS COMPLY WITH NEC (LISTED ON T1) ARTICLE 210.10(A)(1) FPN NO. 4.

ELECTRICAL NOTES

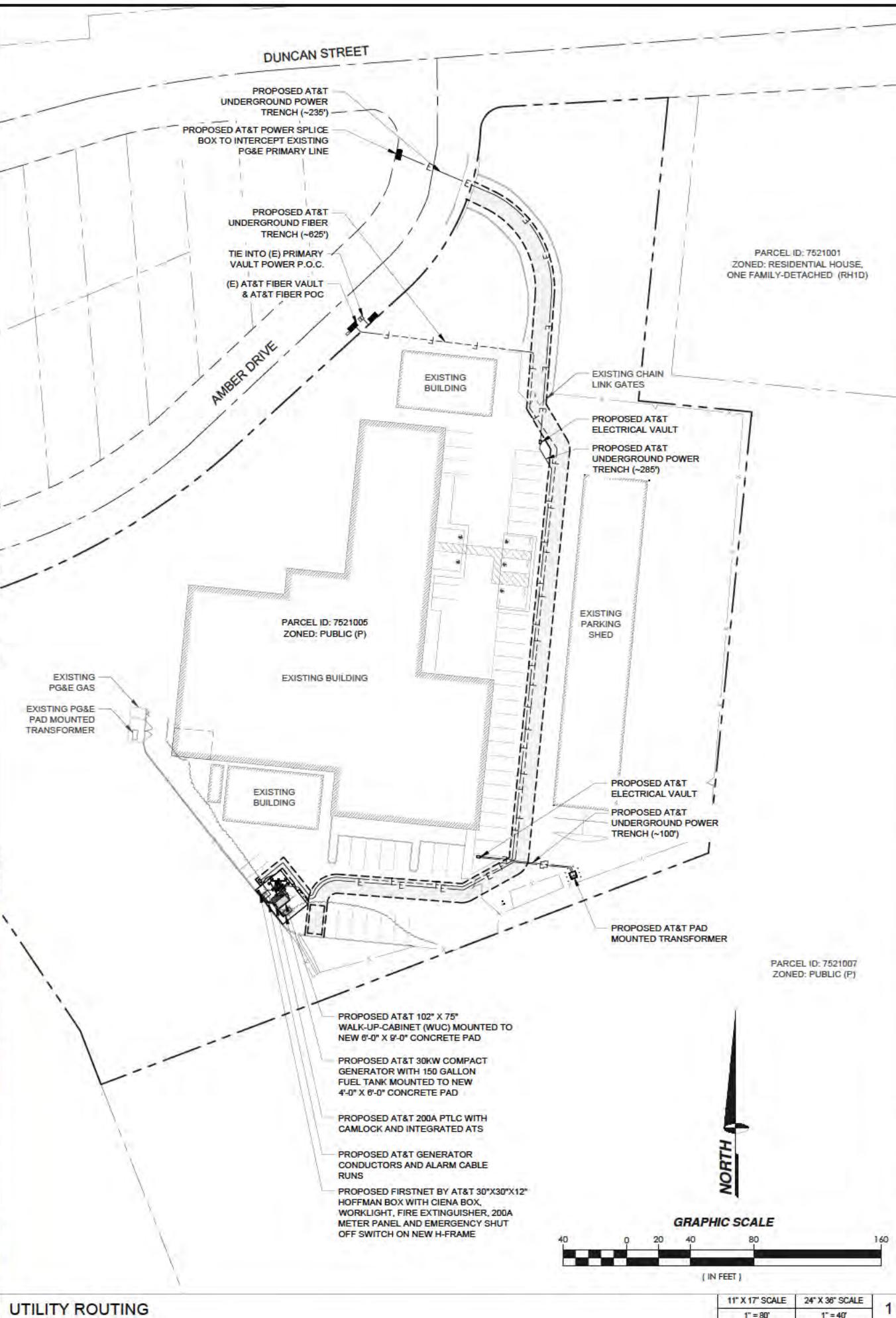
SCALE: NONE 3

PANEL NAME:				X		BUS:				225		P VOLTAGE:				120/240, 1Ø, 3W		MOUNTING:		PEDESTAL	
LOCATION:				R.O.W.		MAIN C.B.:				200		AIC RATING:				42,000		TYPE:		MAIN/SUB	
CIRCUIT TYPE:										N = NON-CONTINUOUS C = CONTINUOUS											
CKT #	TY	TRP	POL	DESCRIPTION			ØA	ØB		ØA	ØB	DESCRIPTION			TRP	POL	TY	CIR #			
1	N	30		SPARE			-			560		LIGHT & RECEPACLE			20	1	N	2			
3	N		2								360	BATTERY CHARGER			20	1	N	4			
5	N	25		HVAC			1,400			480		BATTERY HEATER			20	1	N	6			
7	N		2					1,400			2,150	RECTIFIER # 11 & 12			30		N	8			
9	N	20	1	GFCI			180			2,150							2	N	10		
11	N	30		RECTIFIER # 1 & 2				2,150			2,150	RECTIFIER # 13 & 14			30		N	12			
13	N		2				2,150			2,150							2	N	14		
15	N	30		RECTIFIER # 3 & 4				2,150				2,150	RECTIFIER # 15 & 16			30		N	16		
17	N		2				2,150			2,150							2	N	18		
19	N	30		RECTIFIER # 5 & 6				2,150				-						N	20		
21	N		2				2,150			-								N	22		
23	N	30		RECTIFIER # 7 & 8				2,150				-						N	24		
25	N		2				2,150			-								N	26		
27	N	30		RECTIFIER # 9 & 10				2,150				-						N	28		
29	N		2				2,150		-								N	30			
NOTES:				PHASE TOTALS			ØA = 19,820		ØB = 18,960				TOTAL CONNECTED VA:			38,780.00					
															PANEL DEMAND KVA			38.78			
															PANEL DEMAND AMPS:			161.58			
															RGEST Ø DEMAND AMPS:			165.17			

PANEL SCHEDULE

SCALE: NONE 2

UTILITY ROUTING



PROJECT INFORMATION:

CCL05350
SF POLICE ACADEMY

350 AMBER DRIVE
SAN FRANCISCO, CALIFORNIA 94131

PREPARED FOR

at&t

5005 EXECUTIVE PARKWAY
SAN RAMON, CALIFORNIA 94583

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0	11/18/25	100% ZONING	R.C.

LICENSURE:

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

SHEET TITLE:
UTILITY ROUTING, PANEL
SCHEDULE, 1-LINE
DIAGRAM & NOTES

SHEET NUMBER

E-1

File No. 251098 – Appeal of Conditional Use Authorization
Proposed 350 Amber Drive Project (Case No. 2024-0004318CUA)
December 3, 2025
Page 23

Attachment B
Geotech Letter



November 26, 2025

Next Edge Networks

On behalf of AT&T Mobility, LLC

**RE: Preliminary Geological Review for Landslide Susceptibility
Proposed AT&T Mobility New Site Build 104-foot Tall Tower
AT&T ID: CCL05350 / 350 Amber Drive San Francisco, CA
GE²G Project # 311965**

Geist Engineering and Environmental Group, Inc. (GE²G), appreciates the opportunity to have assisted Next Edge Networks by having a Preliminary Geological Review for Landslide Susceptibility report completed for the proposed above listed proposed AT&T Mobility undertaking. This preliminary review is appropriate as design or exact tower location conditions can change during the planning approval process. It is standard practice to conduct a comprehensive geotechnical investigation at the building permit stage.

Executive Summary:

- Based on review of the prior site parcel 1999 report and summary of previous reports included in the 1999 report, documented distress to the existing building has been attributed to settlement of the underlying fill soils and was not caused by slope instability.
- As summarized in the previous geotechnical report reviewed, previous studies have concluded that slope instability is not a concern for the proposed tower. The documented settlement/movement of the existing building has been attributed by other consultants to have occurred due to vertical compression of saturated fill soils.
- Siting a 104-foot tower and accompanying equipment above a mapped landslide zone is appropriate provided a geotechnical investigation is performed including recommendations to address site specific conditions.
- It is routine to build on fill and the design recommendations in the geotechnical investigation are standard and adequately address seismic and soil stability concerns.
- From a technical geotechnical viewpoint, the proposed location is suitable for the proposed foundation to support a 104-foot tall monopole. A Geotechnical Investigation will need to be completed at the building permit stage, including subsurface exploration by test boring method, be performed to evaluate the existing subsurface conditions and provide final geotechnical design recommendations for support of the planned tower.

If you have any inquiries or would like any additional information, please contact me at (510) 610-1453, or sgeist@geistenvironmental.com.

Sincerely,

Stephen Geist, President,
Geist Engineering and Environmental Group, Inc.

Attached:

Completed Preliminary Geological Review for Landslide Susceptibility Review by Salem Engineering Group, Inc. for AT&T: CCL05350, with recommendations as completed by Dean B. Ledgerwood II, Professional Engineer (PE) 94395/ Professional Geologist (PG) 8725 / Certified Engineering Geologists (CEG) 2613 Geotechnical Manager dated November 24, 2025

November 24, 2025

Project 5-225-1040

Mr. Stephen Geist
Geist Engineering and Environmental Group
4200 Park Boulevard, 149
Oakland, California

SUBJECT: Preliminary Geological Review for Landslide Susceptibility
Proposed 104' AT&T Communications Tower Site
Site ID: CCL05350 SF Police Academy
350 Amber Drive
San Francisco, CA

Dear Mr. Geist,

At your request and authorization, SALEM Engineering Group, Inc. (SALEM) has prepared this preliminary geologic review for landslide susceptibility as it pertains to the subject site and the proposed AT&T 104' monopole. This letter has been prepared based on SALEM's review of the project plans provided, review of available public geologic data, and site reconnaissance performed by SALEM's Engineering Geologist.

The findings of this preliminary review do not include a subsurface investigation or slope stability analysis. The intent of this report was to provide a geologic review of the potential for landslide/slope instability based on document review, review of aerial imagery, and surficial observations.

Executive Summary

- Construction of the planned 104' monopole tower and supporting equipment is considered feasible. A site specific geotechnical investigation within the limits of the planned tower should be performed. The future geotechnical investigation would include recommendations to adequately address support of the tower within existing fills and will address seismic and soil stability concerns in accordance with current industry standards and requirements of the current California Building Code.
- The subject tower area is not located in an area identified as having known landslide hazard by CGS or the City of San Francisco. CGS and the City of San Francisco identify a potential landslide hazard zone within a portion of the descending slope, approximately 80 west of the tower location. The future geotechnical investigation should include analysis and recommendations for the planned improvements to be supported within the existing fills and **not** increase risk for instability of the descending slope. Provided the tower is designed and constructed in accordance with the recommendations of the future geotechnical report, constructing the 104' tower and equipment up-slope of the mapped landslide hazard zone would not be a concern.
- Previous geotechnical reports provided for review summarized that slope instability is not a concern within the site.
- Based on review of the previous geotechnical reports provided at the time of this letter, documented distress to the existing SFPD Academy Building has been attributed to settlement/compression of the underlying fill soils and not by slope instability;
- From a Geotechnical and Geologic perspective, the proposed tower location and plans to support a 104' tall monopole tower would not be anticipated to increase risk for slope instability;

Planned Construction

It is our understanding that the project will include construction of a 104' an Francisco Police Academy facility (see Figure No. 1). The tower is planned to be located near the southern edge of an existing paved area, near the top of an existing slope (see Figure No.1). The top of the slope is approximately 250 feet east (measured horizontally) of the western property line. Based on review of available topographic information, the existing slope is estimated to have a repose of approximately 5 horizontal (H) to 1 vertical (V). The lease site area is relatively flat and level and is located approximately 10 to 12 feet horizontally from the top of the existing slope. It is anticipated that the monopole tower will be supported on cast-in-drilled-hole (CIDH) pile foundations. Based on our experience with tower projects, the foundation loads are expected to be light to moderate, with foundation design governed by lateral loading.

Site History

Based on review of available historical aerial imagery from UC Santa Barbara Historical Aerial Imagery Library (<https://www.library.ucsb.edu/geospatial/aerial-photography>) the surrounding area including the subject site was graded and surrounding area was developed during the early to mid-1960s. Aerial imagery dated July 29, 1946 depicts the area of the SFPD parcel as generally open land, and appears to gently slope to the west/southwesterly direction. Aerial imagery, dated July 10, 1963, indicates large mass grading was occurring on the property, including at and around the proposed tower location. An aerial image, dated May 11, 1965, depicts the tower site and overall building areas of the site as relatively flat. The existing church, located northwest of the site, had been constructed (not previously depicted in the 1963 image). Slope terraces descending to the southwest were noted. A 1993 aerial image published on Google Earth, depicts the tower site and subject property in similar condition to the present day condition.

A previous Geotechnical Investigation Report, prepared by Trans Pacific Geotechnical Consultants, Inc., dated January 18, 1999 was provided to SALEM for review. The previous report was noted to be un-signed and marked Draft. The previous report had been prepared to address proposed remodeling and seismic upgrades to the San Francisco Police Academy building. Based on review of the previous report, the 1999 report indicated that previous geotechnical investigations by Woodward Clyde Sherard and Associates were prepared for the original Diamond Heights Elementary School (January 29, 1965), a second report addressing conditions of walls and floor slab (March 21, 1969), and a third report addressing settlement in the south wing of Diamond Heights Elementary School (June 7, 1976). In addition, the 1999 report included review of a July 15, 1977 report by Harding Lawson Associates addressing additional movements to the Diamond Heights Elementary School building. These reports have not been made available to SALEM to review at this time. According to the 1999 report, previous reports summarize a history of settlement that occurred to the existing building. The Woodward Clyde Sherard (WCS) reports were reported to summarize settlement of the existing building at rate of about 1.5 inches per year. The WCS reports documented 8 inches of vertical deformation at the south end of the building, and horizontal deformation of fill at Christopher Park (downslope of the SFPD site) of about 1 inch. Reportedly, the WCS reports concluded *“that the entire mass of fill placed to develop Christopher Park and the school property was moving along the original ravine slopes”*. The Harding Lawson Associates (HLA) report prepared in 1977 included an independent investigation of the movements of the building. According to the 1999 report, the HLA report summarized several theories of possible movement, including noting that there as a documented 6 year period between 1967 and 1973 where no settlement occurred. It was summarized that the HLA report had correlated the settlement occurred following periods of higher than normal rainfall. The HLA

report also reportedly summarized that the existing fill soils had compaction results ranging between 86 and 98 percent (averaging 92 percent). The HLA report indicated the predicted settlement rate would be around 1.5 to 2 inches per year and a total of 11 inches of settlement within the 2 story wing of the building was measured as of 1977. The 1999 report reported that HLA concluded *““The site is stable against a large scale landslide and continue to be used safely for a school”, however the two story wing was considered to be potentially unsafe during an earthquake and should not be reoccupied.”*

According to the 1999 report, *“On March 13, 1979 Harding Lawson Associates issued a final report addressing the settlement monitoring on the site. There was slight lateral movement of the fill but no indications to suggest a potential landslide. Settlement was still occurring within the two story wing.”*

The 1999 report included subsurface exploration extending to depths of about 31.5 feet BSG. The borings reportedly encountered medium stiff to stiff gravelly clay with rock fragments to depths of 18 to 20 feet BSG and sandy lean clay underlain by medium dense wet clayey gravel with rock fragments to 20 feet BSG. These materials were underlain by medium dense clayey gravel and sand to the maximum depths explored of 31.5 feet BSG. The test borings and subsurface soils description did not clearly distinguish between fills and native materials, however, the report later states that fills on the order of 35 to 45 feet thick may be present in the northern portion of the building and 60 to 90 feet thick in the southern portion of the building.

Based on review of the 1999 report and summary of previous reports included in the 1999 report, documented distress to the existing building has been attributed to settlement of the underlying fill soils and was not caused by slope instability.

SALEM has not been provided with any other historic documentation pertaining to the existing construction or previous reports documenting historic cases of instability within the site. A document review request was made to the City of San Francisco Record Department, however, no information had been provided at the time of this report. If available, SALEM should be provided with any available documents for relating to the history of the property and/or ground instability.

Observations of the Property by Engineering Geologist

On November 18, 2025, Mr. Dean Ledgerwood CEG #2613 (SALEM Engineering Geologist) walked the property, including the proposed lease area and adjacent slope, to observe visible exterior surficial conditions potentially related to ground instability (such as potential landslides).

An existing two story building, with an approximate plan view area of about 28,000 square feet, occupies the central portion of the property. The building construction appeared to include concrete masonry unit (CMU) wall construction with concrete pilasters supporting roof loads. The exterior walls of the existing building appeared to be in good condition. No cracking of the CMU walls, concrete columns, or concrete stem walls was noted during our site reconnaissance. During our site reconnaissance, Mr. Joel Hornstein (SFPD) indicated that he had no knowledge of any previous distress to the building during the past approximately 20 years that he has been working at the site. However, it should be noted Mr. Hornstein mentioned the interior floor in his office did not appear to be level. Mr. Hornstein's comment regarding the floor surface appearing out of level corresponds with our understanding of the historic performance of

the building summarized in the 1999 report. Our site reconnaissance did not include review of the interior of the building.

The areas surrounding the building included asphaltic concrete pavements, with a parking canopy located east of the building. The pavements were noted to be in poor condition with potholes, alligator cracking, and raveling noted throughout. It is our understanding that no pavement repairs or rehabilitation activities have been performed over at least the past 20 years. The pavement condition was considered appropriate considering the age of the pavements. An existing transformer pad with CMU wall enclosure was noted at the top of the slope, east of the existing building. An asphaltic concrete curb was noted at the western edge of the pavements, at the top of a graded southwest facing slope. SALEM did not observe any signs of distress to the curblin or equipment enclosure.

Based on review of the City of San Francisco Elevation Contours Website (<https://data.sfgov.org/Energy-and-Environment/Elevation-Contours/rmbg-2qwx/data>), the southwest facing slope, was noted to be about 150+ feet high, and descends to the southwest away from the proposed tower area. The slope is estimated to have a repose of approximately 5H to 1V. The western property line is about mid-slope, located approximately 250 feet west of the top of slope (developed area). A public asphaltic concrete walking path and asphalt lined swale were noted near the western property line. The existing walking path and asphalt lined swale were noted to be in good condition and did not show visible signs of distress. The slope is covered with mature trees and native grasses. The tree trunks were generally noted to be vertical in orientation and had heights estimated to be greater than 60 to 80 feet. The slope face was generally uniform with no evidence of slope distress/movement. Near the top of the slope, some green grassy vegetation was noted. The greener vegetation was noted to be within an area where surface stormwater runoff was directed to from the pavements at the SFPD site.

Geologic Map and Seismic Hazard Map Document Review

Based on the Preliminary Geologic Map of the San Francisco South 7.5' Quadrangle and part of the Hunters Point 7.5' Quadrangle, the site appears to be mapped in Colma Foundation (Qc). Considering our review of historical aerial imagery, the western portion of the site appears to include fill soils placed during the 1960s.

Based on review of the CGS Seismic Zone Hazard Maps and San Francisco Seismic Hazard Zones mapping, the western portion of the parcel is mapped within a mapped Landslide Hazard Zone; however, the area of the planned tower is not located within the mapped landslide hazard zone. The mapped landslide hazard zone is noted to be approximately 80 feet west of the planned tower location.

Based on review of the Associated of Bay Area Governments (ABAG) Hazard View Map, the area of the proposed tower lease and entire SF Police Academy parcel is within an area mapped as "flat land" designation for potential Rainfall Induced Landslides. ABAG defines "flat land" as areas unlikely to have a landslide event.

Conclusions

Based on our observations of the exterior surficial conditions and exterior of the existing building, no visible evidence of previous slope movement/landslides was noted during our November 2025 site observations conducted by an Engineering Geologist.

It was noted that a portion of the SFPD parcel site is located within a mapped landslide hazard zone. However, the area of the planned tower is not located within the mapped landslide hazard zone. Therefore, the area of the planned lease area is not considered to be within an area mapped by local or state jurisdiction as having known potential for landslide hazards.

As summarized in the previous geotechnical report reviewed, previous studies have concluded that slope instability is not a concern for the site. The documented settlement/movement of the existing building has been attributed by other consultants to have occurred due to vertical compression of saturated fill soils.

Based on our understanding of the previous grading, fills with thicknesses greater than 40 feet may be present within the site, including the area of the planned tower. It is recommended that a Geotechnical Investigation, including subsurface exploration by test boring method, be performed to evaluate the existing subsurface conditions and provide geotechnical design recommendations for support of the planned tower.

The planned tower is anticipated to be supported using a CIDH pile foundation. Cellular tower monopole foundation loads are generally considered to be light to moderate. The cellular tower vertical loads supported on CIDH pile foundations would evenly distribute the load stresses and therefore, would not be anticipated to impart significant increased stresses to the existing fills. Thus, the tower structure would not be anticipated to result in an increased potential for additional static settlements to occur outside the tower lease area.

Construction of the proposed tower improvements would not be anticipated to increase surface water drainage over or into the existing western slope area. Also, the tower construction would not result in a potential for increased saturation of the fills.

Provided the tower foundations are designed based on the findings of a comprehensive Geotechnical Investigation, it is our opinion that the proposed cellular tower project would not pose an increased risk to slope instability, nor would the tower structure increase the potential for compression/settlement of the existing fills.

CLOSING

If site conditions change due to natural processes or human intervention on the property or adjacent to the site, or changes occur in the nature or design of the project, or if there is a substantial time lapse between the submission of this report and the start of the work at the site, the conclusions and recommendations contained in our report will not be considered valid unless the changes are reviewed by SALEM and the conclusions of our report are modified or verified in writing. This report did not include subsurface investigation. A comprehensive geotechnical investigation, including subsurface borings, should be performed to provide Geotechnical Design recommendations for the planned construction. SALEM has prepared this report for the exclusive use of the owner and design consultants.

This report has been prepared in accordance with generally accepted geologic practices. No other warranties, either express or implied, are made as to the professional advice provided under the terms of our agreement and included in this report.

If you have any questions, or if we may be of further assistance, please do not hesitate to contact our office at (559) 271-9700.

Respectfully submitted,


SALEM ENGINEERING GROUP, INC.



Dean B. Ledgerwood II, PE, PG, CEG
Geotechnical Manager
PE 94395 / PG 8725 / CEG 2613





SITE PLAN	SCALE: 1" = 80'	DATE: NOV 2025	 SALEM engineering group, inc.
PROPOSED CELL TOWER 350 AMER DRIVE SAN FRANCISCO, CALIFORNIA	DRAWN BY: DL	APPROVED BY: DL	
	PROJECT No. 5-225-1040	FIGURE NO. 1	

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Attachment C
Radio Frequency Statement

AT&T Mobility Radio Frequency Statement
350 Amber Dr., San Francisco, CA
AT&T Site ID CCL05350

AT&T has experienced an unprecedented increase in mobile data use on its network since the release of the iPhone in 2007. AT&T estimates that in the decade following introduction of the iPhone in 2007, mobile data usage has increased 470,000% on its network. AT&T forecasts its customers' growing demand for mobile data services to continue. In 2022, wireless data traffic increased to 73.7 trillion megabytes, a 38% increase from 2021, and is expected to increase 58 gigabytes per smartphone per month on average (4x current usage) by 2028. The increased volume of data travels to and from customers' wireless devices and AT&T's wireless infrastructure over limited airwaves — radio frequency spectrum that AT&T licenses from the Federal Communications Commission.

Spectrum is a finite resource and there are a limited number of airwaves capable and available for commercial use. Wireless operators license those airwaves from the FCC. To ensure that service quality, AT&T must knit together its spectrum assets to address customers' existing usage and forecasted demand for wireless services, and it must use its limited spectrum in an efficient manner.

AT&T uses high-band (i.e., 6 GHz and higher), mid-band (i.e., C-Band spectrum, 2300 MHz, 2100 MHz, and 1900 MHz), and low-band (i.e., 850 MHz and 700 MHz) spectrum to provide wireless service. Each spectrum band has different propagation characteristics and signal quality may vary due to noise or interference based on network characteristics at a given location. To address this dynamic environment, AT&T deploys multiple layers of its licensed spectrum and strives to bring its facilities closer to the customer. The proposed new wireless communications facility is located south of the San Francisco Police Academy building at 350 Amber Dr., San Francisco, CA (the "Property"). The site is needed to close a coverage gap in 4G LTE service in an area roughly bordered by the intersection of Amber Dr. and Turquoise Way to the north, O'Shaughnessy Blvd. to the south and west, and Diamond heights Blvd. to the east. This gap area includes numerous homes, businesses in the Diamond Heights Shopping Center, well-traveled roads, Glen Canyon Park, St. Nicholas Antiochian Orthodox Church and other points of interest in the vicinity.

The service coverage gap is caused by inadequate infrastructure in the area. AT&T currently has existing sites in the broader geographical area surrounding the Property but, as existing coverage map illustrates, these existing sites do not provide sufficient 4G LTE service in the gap area. Wireless telecommunications is essentially a line-of-sight technology, and AT&T's antennas need to be high enough to propagate an effective signal throughout the gap area. To meet its coverage objectives for this gap area, AT&T proposes a the proposed wireless communications facility. Denial of this proposed facility would materially inhibit AT&T's ability to provide and improve wireless services in this portion of the city.

The facility at the Property will help to close the gap in coverage and help address rapidly increasing data usage driven by smart phone and tablet usage. This site is part of an effort to fully deploy 4G LTE technology in the area. Specifically, the proposed facility will close this service coverage gap and provide sufficient 4G LTE coverage for AT&T customers in the affected area. LTE technology also offers low latency, or the processing time it takes to move data through a network, such as how long it takes to start downloading a webpage or file once one has sent the request. Lower latency helps to improve the quality of personal wireless services. What's more, LTE uses spectrum efficiently, creating more space to carry data traffic and services and to deliver a better overall network experience.

It is important to understand that service problems can and do occur for customers even in locations where the coverage maps on AT&T's "Coverage Viewer" website appear to indicate that coverage is available. As the legend to the Coverage Viewer maps indicates, these maps display approximate outdoor coverage. Actual coverage in an area may differ from the website map graphics, and it may be affected by such things as terrain, weather, network changes, foliage, buildings, construction, signal strength, high-usage periods, customer equipment, and other factors.

It is also important to note that the signal losses, slow data rates, and other service problems can and do occur for customers even at times when certain other customers in the same vicinity may not experience any problems on AT&T's network. These problems can and do occur even when certain customers' wireless phones indicate coverage bars of signal strength on the handset. The bars of signal strength that individual customers can see on their wireless phones are an imprecise and slow-to-update estimate of service quality. In other words, a customer's wireless

phone can show coverage bars of signal strength, but that customer will still, at times, be unable to initiate voice calls, complete calls, or download data reliably and without service interruptions due to service quality issues.

To determine where equipment needs to be located for the provisioning of reliable service in any area, AT&T's radio frequency engineers rely on far more complex tools and data sources than just signal strength from individual phones. AT&T uses industry standard propagation tools to identify the areas in its network where signal strength is too weak to provide reliable in-building service quality. This information is developed from many sources including terrain and clutter databases, which simulate the environment, and propagation models that simulate signal propagation in the presence of terrain and clutter variation. AT&T designs and builds its wireless network to ensure customers receive reliable in-building service quality. This level of service is critical as customers increasingly use their mobile devices as their primary communication devices. According to the Center for Disease Control and Prevention (CDC), more than 83% of California adults, and more than 98% of Californians under age 18, rely exclusively or primarily on wireless communications in their homes. And California households rely on their mobile devices to do more (E911, video streaming, GPS, web access, text, etc.). In fact, California reported to the FCC that there were more than 23.2 million wireless calls and 95,539 texts to 911 in 2021 (the most recent year for state level data).

The proposed facility at the Property is also a part of AT&T's commitment to supporting public safety through its partnership with FirstNet, the federal First Responder Network Authority. Conceived by the 9/11 Commission Report as necessary for first responder communications, Congress created the federal First Responder Network Authority, which selected AT&T to build and manage FirstNet, the first-ever nationwide first-responder wireless network. The proposed facility will provide new service on Band 14, which is the nationwide high-quality spectrum set aside by the U.S. government for public safety. Deployment of FirstNet in the subject area will improve public safety by putting advanced wireless technologies into the hands of public safety agencies and first responders.

The existing 4G LTE service coverage (without the proposed installation at the Property) map includes 4G LTE service coverage provided by other existing AT&T sites. The green shaded areas of the map depict acceptable and reliable in-building coverage. In-building coverage means

customers are able to place or receive a call on the ground floor of a building. The yellow shaded areas depict areas within a signal strength range that provide acceptable and reliable in-vehicle service coverage. In these areas, an AT&T customer should be able to successfully place or receive a call within a vehicle. The blue and white shading depicts areas within a signal strength range in which a customer might have difficulty receiving a consistently acceptable level of service. The quality of service experienced by any individual customer can differ greatly depending on whether that customer is indoors, outdoors, stationary, or in transit. Any area in the yellow, blue, or white category is considered inadequate service coverage and constitutes a service coverage gap.

The proposed coverage map predicts 4G LTE service coverage based on signal strength in the vicinity of the Property if the proposed facility is constructed as proposed in the application. As shown by this map, constructing the proposed facility at the Property closes this significant service coverage gap.

My conclusions are based on my knowledge of the Property and with AT&T's wireless network and its wireless communications facilities in the surrounding area. I have a Bachelor of Science Degree in Electrical Engineering from the University of California, Davis, and have worked as an engineering expert in the wireless communications industry for more than 29 years.

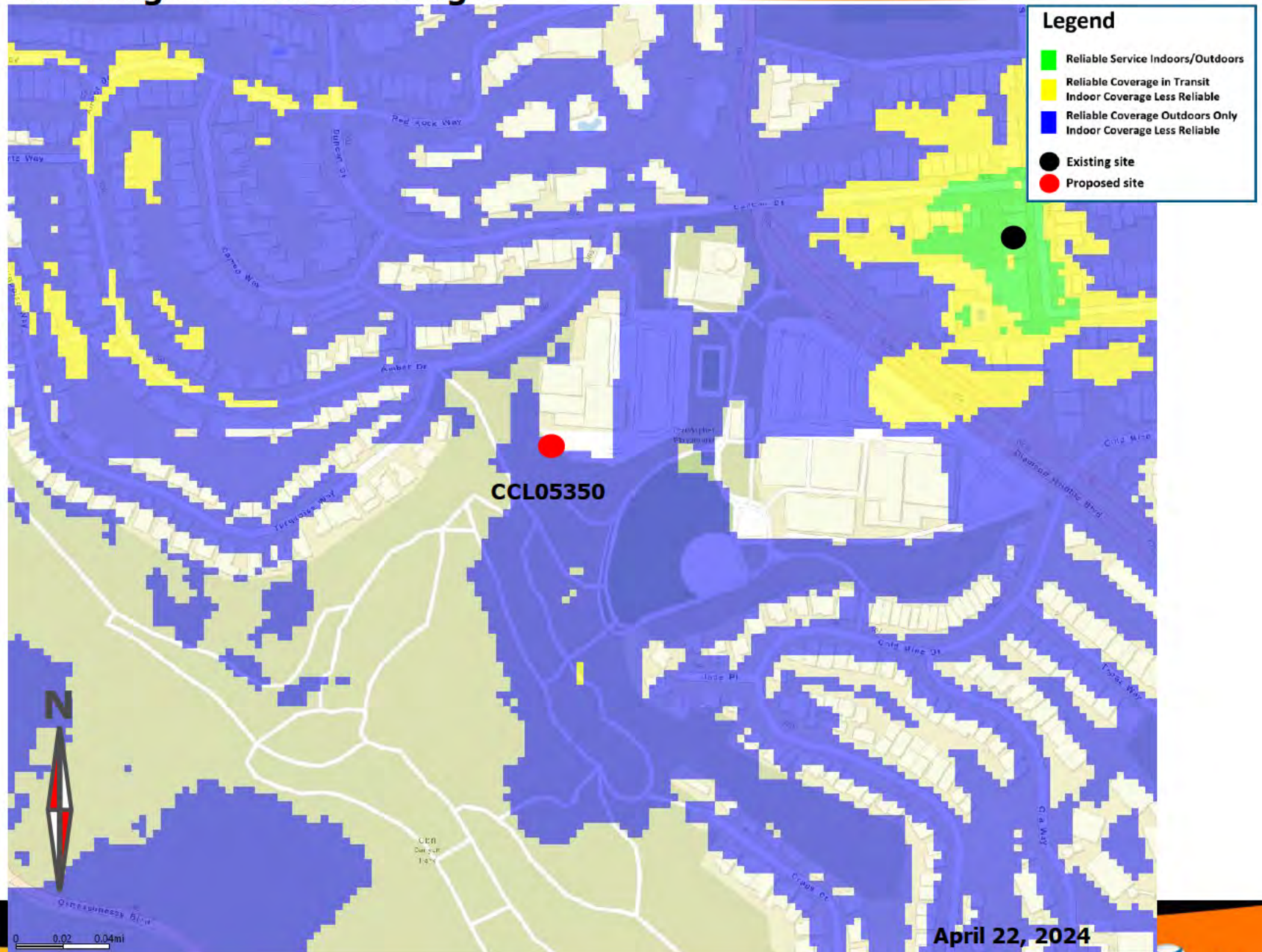


Michael Caniglia
AT&T Mobility Services LLC
Network, Planning & Engineering
RAN Design & RF Engineering
May 2024

CCL05350 Service Maps

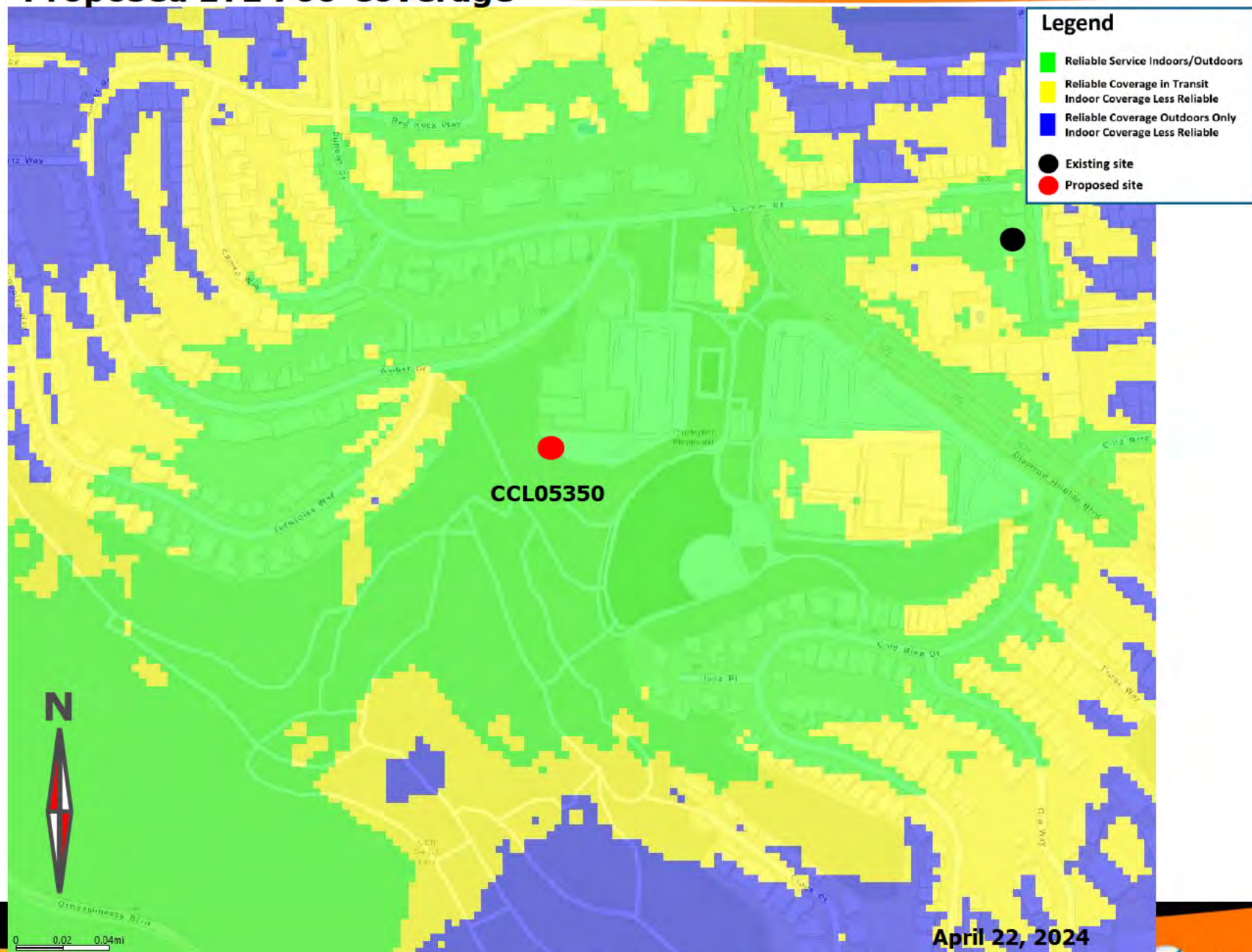
April 22, 2024

Existing LTE 700 Coverage



Disclaimer: "AT&T PROPRIETARY -- This information constitutes confidential trade secrets and commercial or financial information owned by AT&T and is shared for Critical Infrastructure Protection purposes only. It is exempt from disclosure under the Freedom of Information Act (5 U.S.C. 552). Exemptions (b)(3)&(4), and its disclosure is prohibited under the Trade Secrets Act (18 U.S.C. 1905), the Critical Infrastructure Information Act of 2002, 6 U.S.C. § 133, and any State or local law requiring disclosure of information or records. This information must not be copied or distributed to others not agreed upon by AT&T, but in all events do not copy or distribute to such others without notification pursuant to Executive Order 12600."

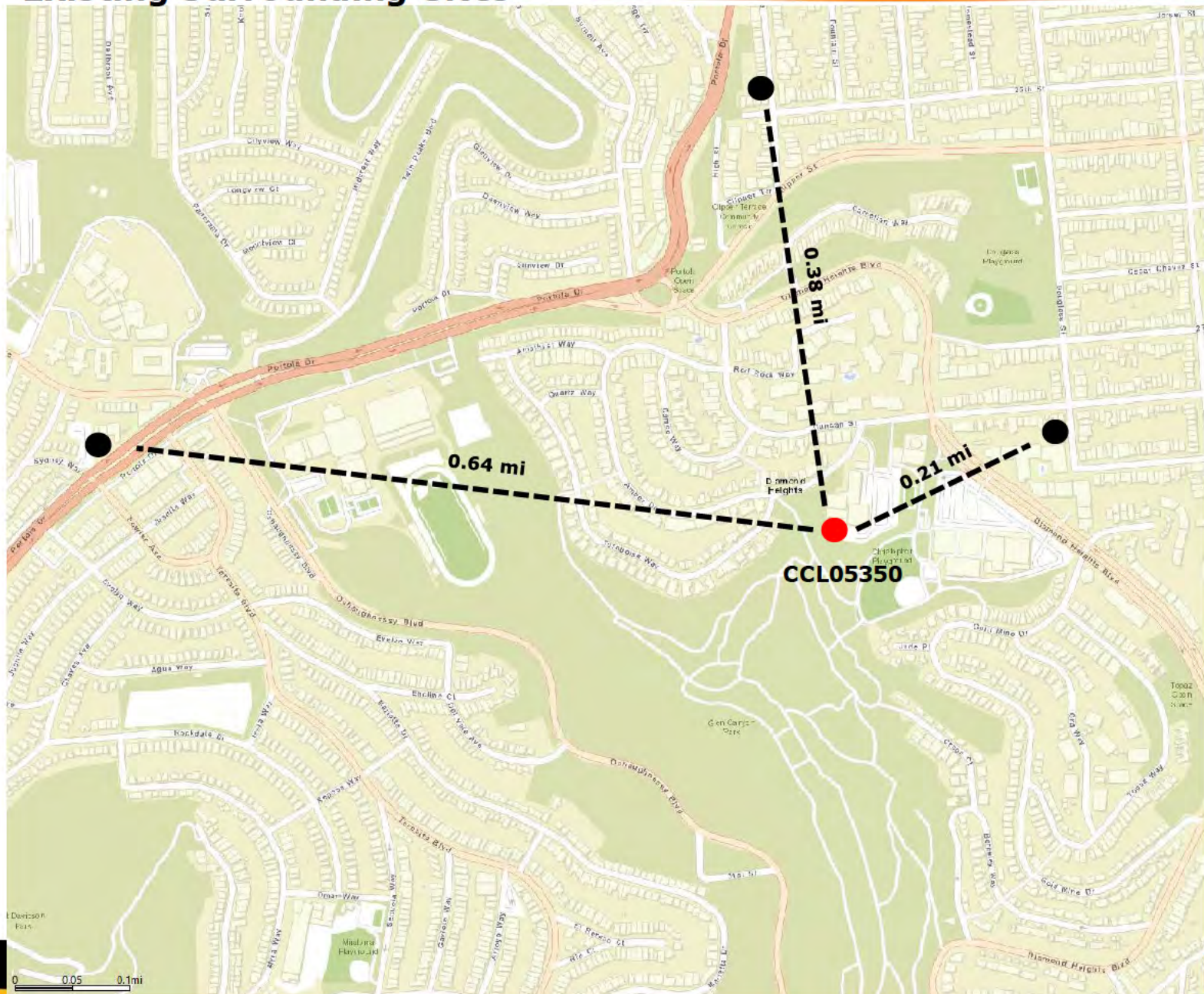
Proposed LTE 700 Coverage



April 22, 2024

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Existing Surrounding Sites



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Attachment D
Hammett & Edison, Inc. Letter



HAMMETT & EDISON, INC.
CONSULTING ENGINEERS
BROADCAST & WIRELESS

WILLIAM F. HAMMETT, P.E.
ROBERT P. SMITH, JR.
MANAS S. REDDY, P.E.

ROBERT L. HAMMETT, P.E.
1920-2002
EDWARD EDISON, P.E.
1920-2009

DANE E. ERICKSEN, P.E.
CONSULTANT

BY E-MAIL BEN.FOUST@NEXTEDGENETWORKS.COM

May 6, 2024

Mr. Ben Foust
Modus LLC
240 Stockton Street, Third Floor
San Francisco, California 94108

Dear Ben:

As requested, we have conducted the review required by the City of San Francisco of the coverage maps that AT&T Mobility will submit as part of its application package for its base station proposed to be located at 350 Amber Drive (Site No. CCL05350). This is to fulfill the submittal requirements for Planning Department review.

Executive Summary

We concur with the coverage maps provided by AT&T for the proposed base station located at 350 Amber Drive in San Francisco. The maps provided to show the before and after conditions represent the carrier's present and post-installation coverage.

Based on information provided by AT&T, including zoning drawings by Spectrum Services, LLC, dated February 6, 2024, it is proposed to install twelve directional panel antennas – three each Quintel Model QD668-2 and QD6612-2, and six Ericsson Model AIR6419 – on a 100-foot steel pole to be installed south of the San Francisco Police Academy building located at 350 Amber Drive. The Quintel and Ericsson antennas would employ up to 14° and up to 19° downtilt, respectively. The Quintel antennas would be mounted at an effective height of about 100 feet above ground and the Ericsson antennas would be stacked in pairs at effective heights of about 97 and 103 feet above ground. The twelve antennas would be oriented in identical groups of four toward 0°T, 120°T, and 240°T, to provide service in all directions.

AT&T provided for review two coverage maps, dated April 22, 2024, attached for reference. The maps show AT&T's 4G LTE 700 MHz (Band 12) coverage in the area before and after the site is operational. Both the before and after maps show three levels of coverage, which AT&T colors and defines as follows:

Green	Reliable Service Indoors/Outdoors
Yellow	Reliable Coverage in Transit; Indoor Coverage Less Reliable
Blue	Reliable Coverage Outdoors Only; Indoor Coverage Less Reliable

Mr. Ben Foust, page 2
May 6, 2024

We undertook a two-step process in our review. As a first step, we obtained information from AT&T on the software and the service thresholds that were used to generate its coverage maps. This carrier uses commercially available software to produce the maps. The service thresholds that AT&T uses are in line with industry standards, similar to the thresholds used by other wireless service providers.

As a second step, we conducted our own drive test, using an Ascom TEMS Pocket network diagnostic tool with built-in GPS, to measure the actual AT&T 4G LTE 700 MHz signal strength in the vicinity of the proposed site. Our fieldwork was conducted on May 1, 2024, between 10:30 am and 2:30 pm, along a measurement route selected to cover all the streets within the map area that AT&T indicated would receive improved service.

Based on the measurement data, we conclude that the AT&T 4G LTE 700 MHz coverage map showing the service area without the proposed installation includes areas of relatively weak signal levels in the carrier's present coverage. The map submitted to show the after coverage with the proposed base station in operation was reportedly prepared on the same basis as the map of the existing conditions and so is expected to accurately illustrate the improvements in coverage.

We appreciate the opportunity to be of service. Please let us know if any questions arise on this matter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Bill Hammett", with a stylized flourish at the end.

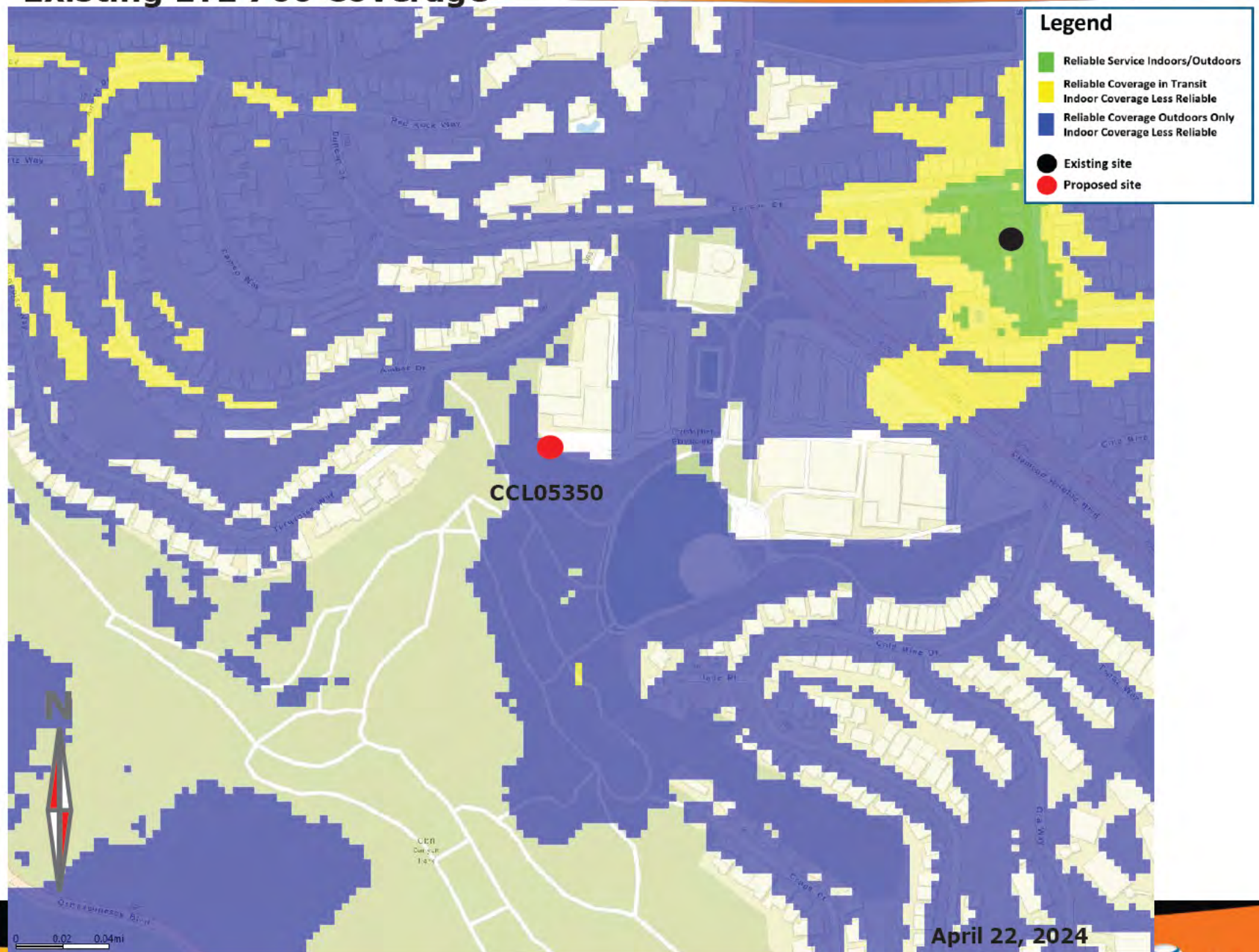
William F. Hammett, P.E.

mv

Enclosures

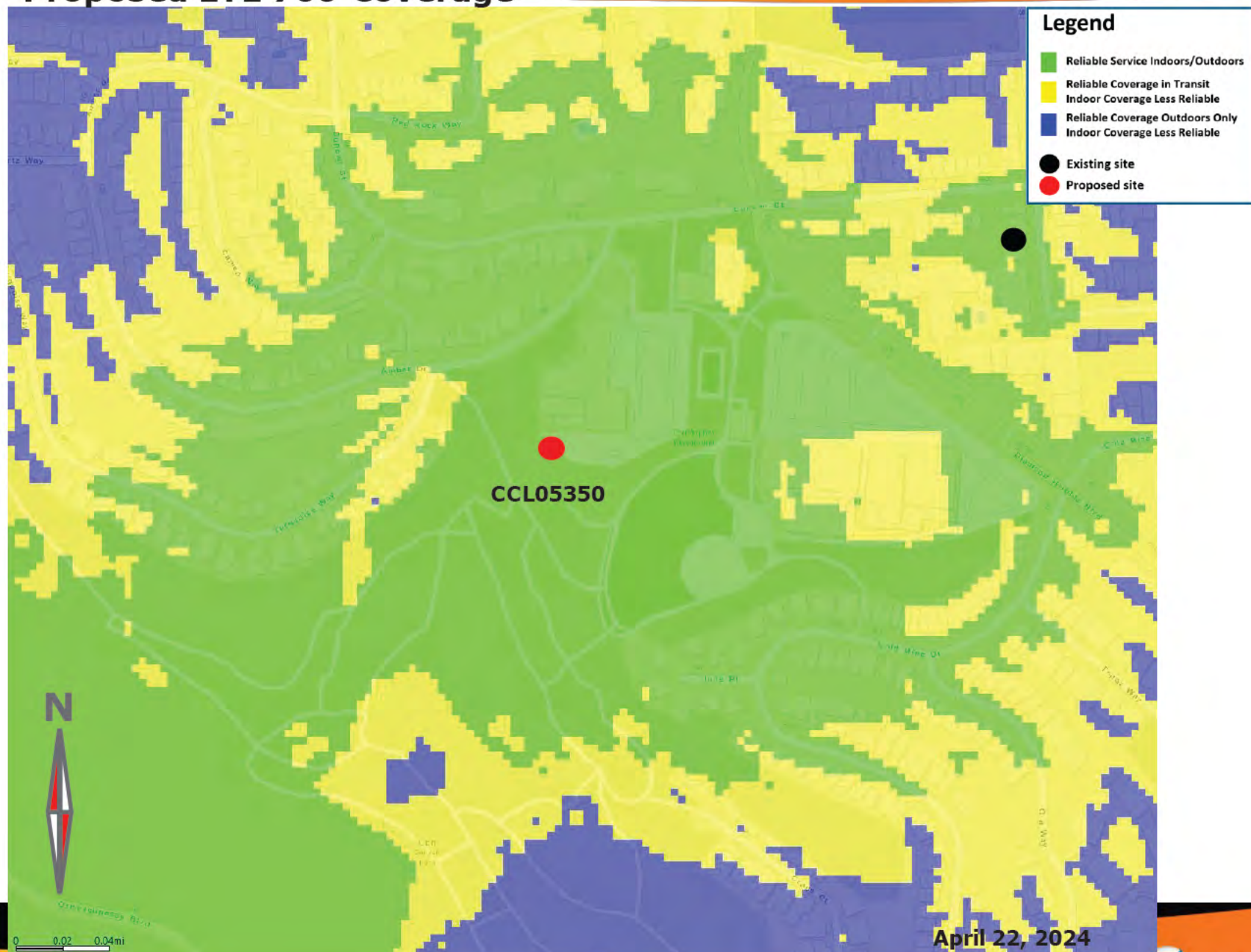
cc: Ms. Lorrie Billalon (w/encls) – BY E-MAIL LBILLALON@MODUSLLC.COM
Mr. Eric Lentz (w/encls) – BY E-MAIL LENTZPLANNING@GMAIL.COM

Existing LTE 700 Coverage



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Proposed LTE 700 Coverage



April 22, 2024

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File No. 251098 – Appeal of Conditional Use Authorization
Proposed 350 Amber Drive Project (Case No. 2024-0004318CUA)
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Attachment E
Alternative Sites Analysis



SF Police Academy Planning Commission

AT&T Site ID# CCL05350

350 Amber Drive

Case No. 2024-004318CUA/SHD

September 25, 2025

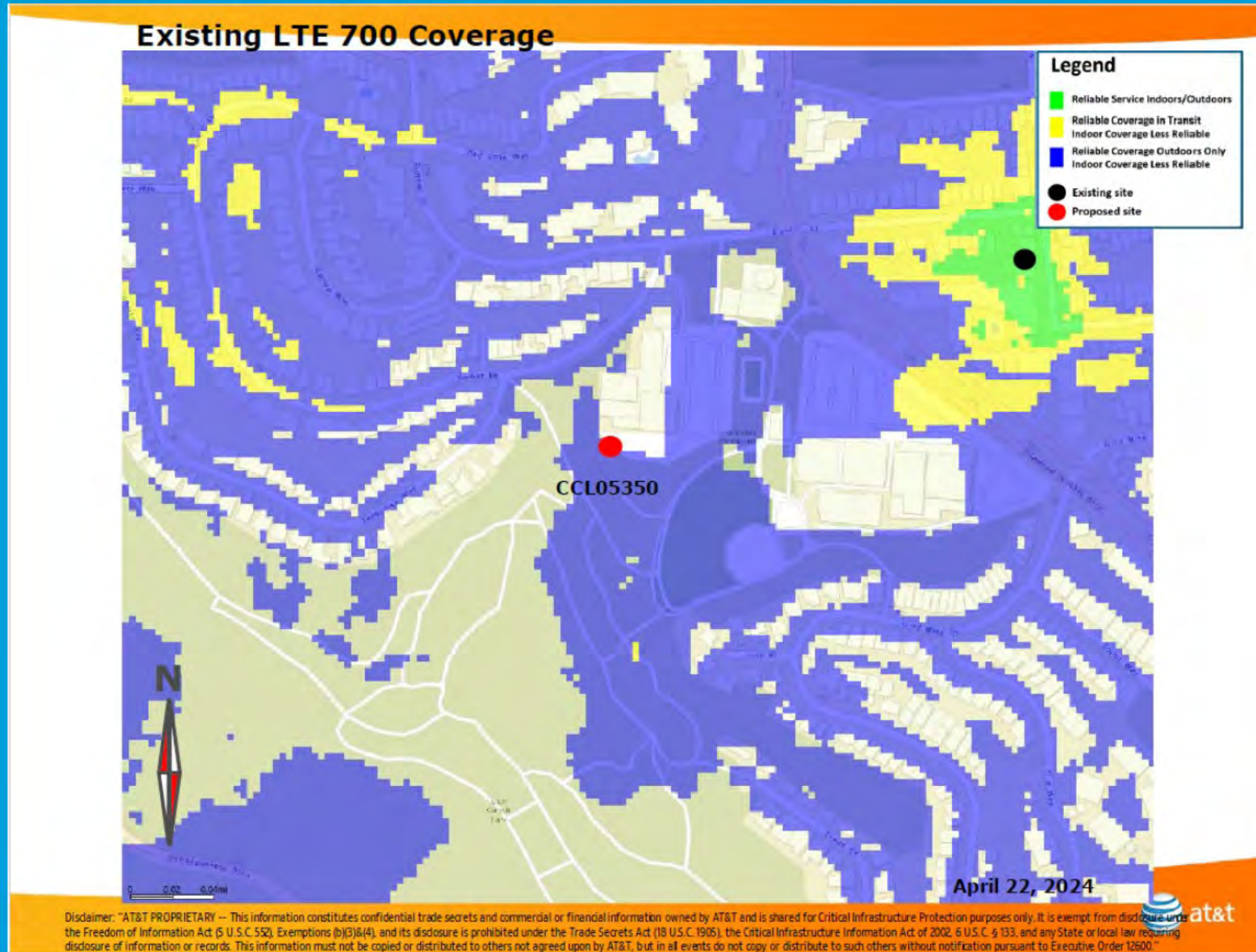
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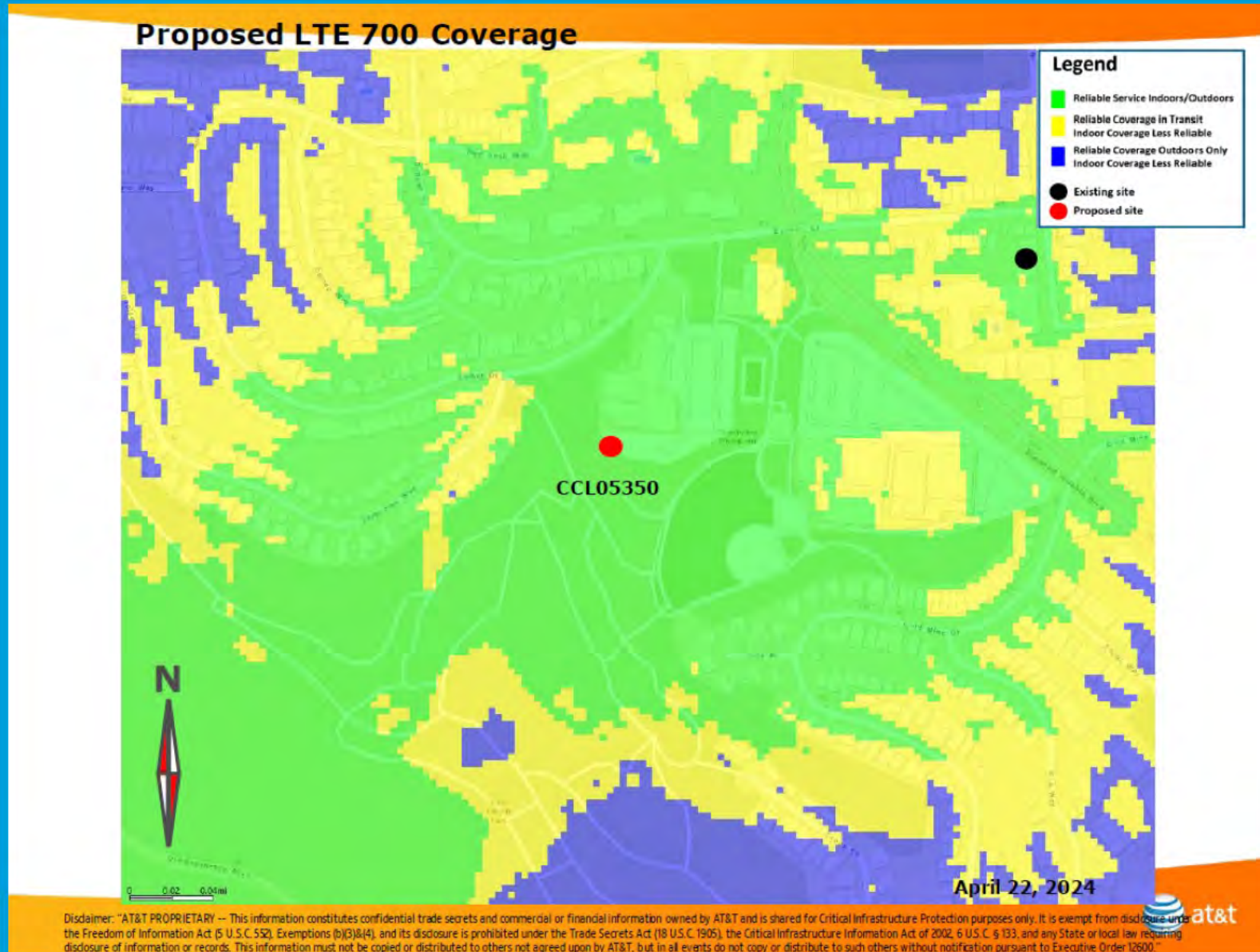
1

Coverage Objective

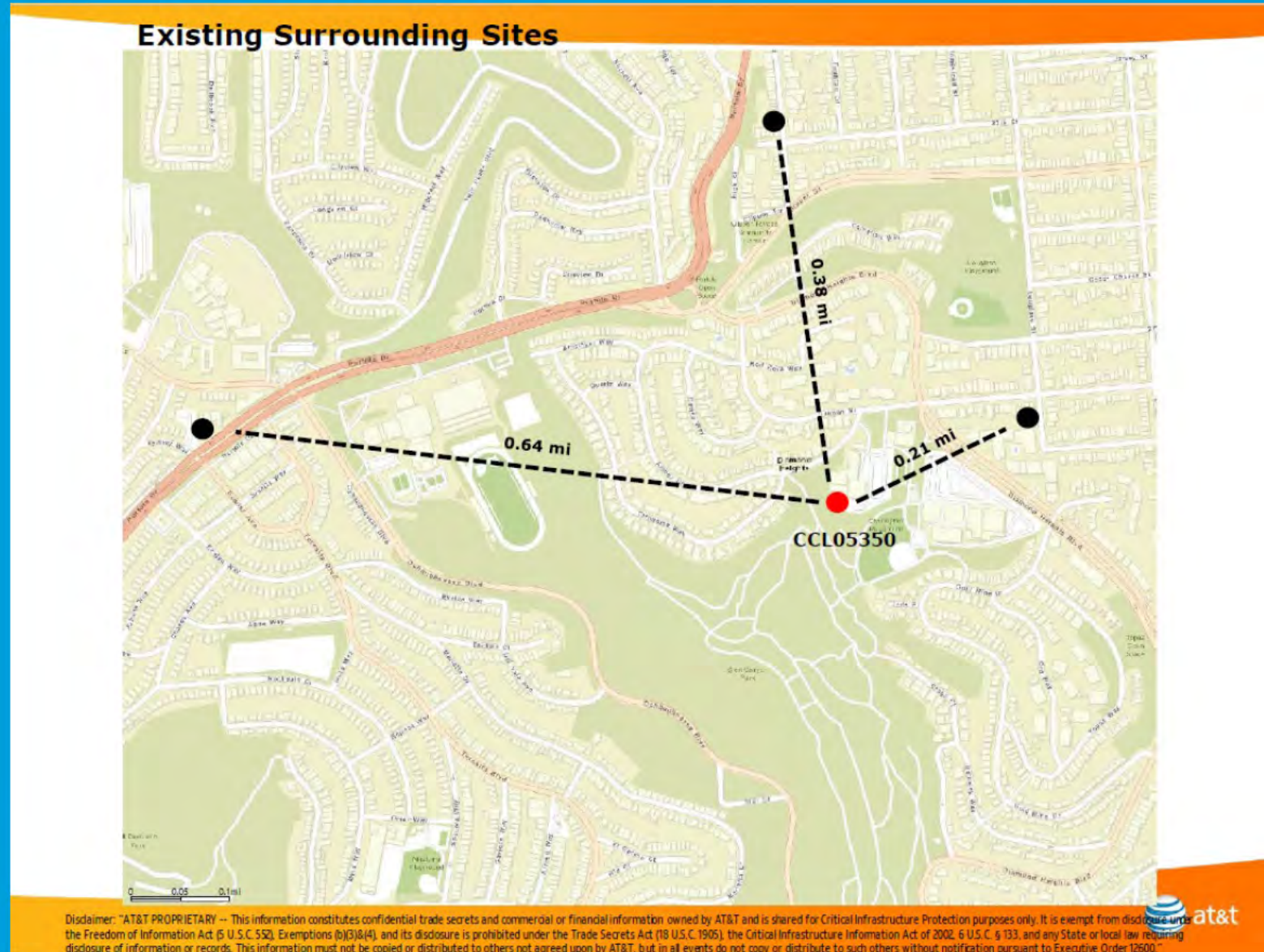
Existing AT&T Coverage



Proposed AT&T Coverage



Nearest Wireless Facilities



2

Alternative Locations

Wireless Telecommunications Services (WTS) Facilities Siting Guidelines

Preference	Examples	Properties in Search Area
1. Publicly-used facilities	Police or fire stations, libraries, community centers, utility poles, telephone switching facilities, churches, etc.	5
2. Co-Location Site	Any existing site on which a legal wireless telecommunications facility.	1
3. Industrial or Commercial Structures	Wholly industrial or commercial structures in certain zones where clutter on roof will be removed as part of installation.	none
4. Industrial or Commercial Structures	Wholly industrial or commercial structures in certain zones where no removal of existing visual clutter will be required.	1
5. Mixed Use Buildings in High Density Districts	Mixed use buildings in certain commercial zones	none
6. Limited Preference Sites	Certain neighborhood commercial zones	none
7. Disfavored Sites	Most residential zones	Most of the search area

Alternative Locations

Address	Use	WTS Location Preference	Reason for not Selected
350 Amber	Public Facility (SF Police Academy)	1	Subject Location
480 Teresita Blvd	Church (Cornerstone Baptist)	1	Location is closer to an existing facility but could provide service to the coverage objective. Property owner was not interested.
5200 Diamond Heights Blvd	Church (St. Nicholas)	1	Location is a lower rooftop and could provide service to portions of the coverage objective. However, antenna centerline height would be limited. Property owner was not interested.
101 Gold Mine Dr	Church (St. Aidan's)	1	Location would not provide sufficient signal to coverage objective area. Coverage area blocked by hillside to the south.
5210 Diamond Heights Blvd	Public Park (Glen Park)	1	Access to location and the availability of utility services would be limited. Property owner was not interested.
5285 Diamond Heights Blvd	Residential Apartments (Delphine)	2	Location would not provide sufficient signal to coverage objective area.
5214 Diamond Heights Blvd	Commercial (Diamond Heights)	4	Location is a lower rooftop with reduced visibility of the coverage objective area. View to the south would be blocked by the hill. Property owner was not interested.

Alternative Locations



