

CEQA & CUA Appeal: AT&T Macro Tower at 350 Amber Drive

251094 & 251098 Hearing Feb 10, 2026

Please APPROVE these appeals

This will be the First Macro Tower of this Size & Bulk in a residential neighborhood and on the boundary of two historic city parks: Glen Canyon and George Christopher Playground. It sets a precedent for permitting such towers in every neighborhood.

Located on the original territory of the Muwekma Ohlone Tribe, Diamond Heights was planned around two parks: George Christopher Playground and Glen Canyon Park. The proposed AT&T 10-story monopole with a Macro Antenna Array Tower on top (with room for a second layer of antennas) is located at the edge of Glen Canyon Park, George Christopher Playground in the Diamond Heights neighborhood. "It is not NECESSARY for or DESIRABLE for and COMPATIBLE with the neighborhood or community" as required for CUA approval (San Francisco Planning Code sec 303(c)). It violates the Planning Code's prioritization of Open Space; it will disrupt historic vistas and neighborhood aesthetics and fails to meet the least intrusive structure standard under the TeleCommunications Act of 1996 (TCA).



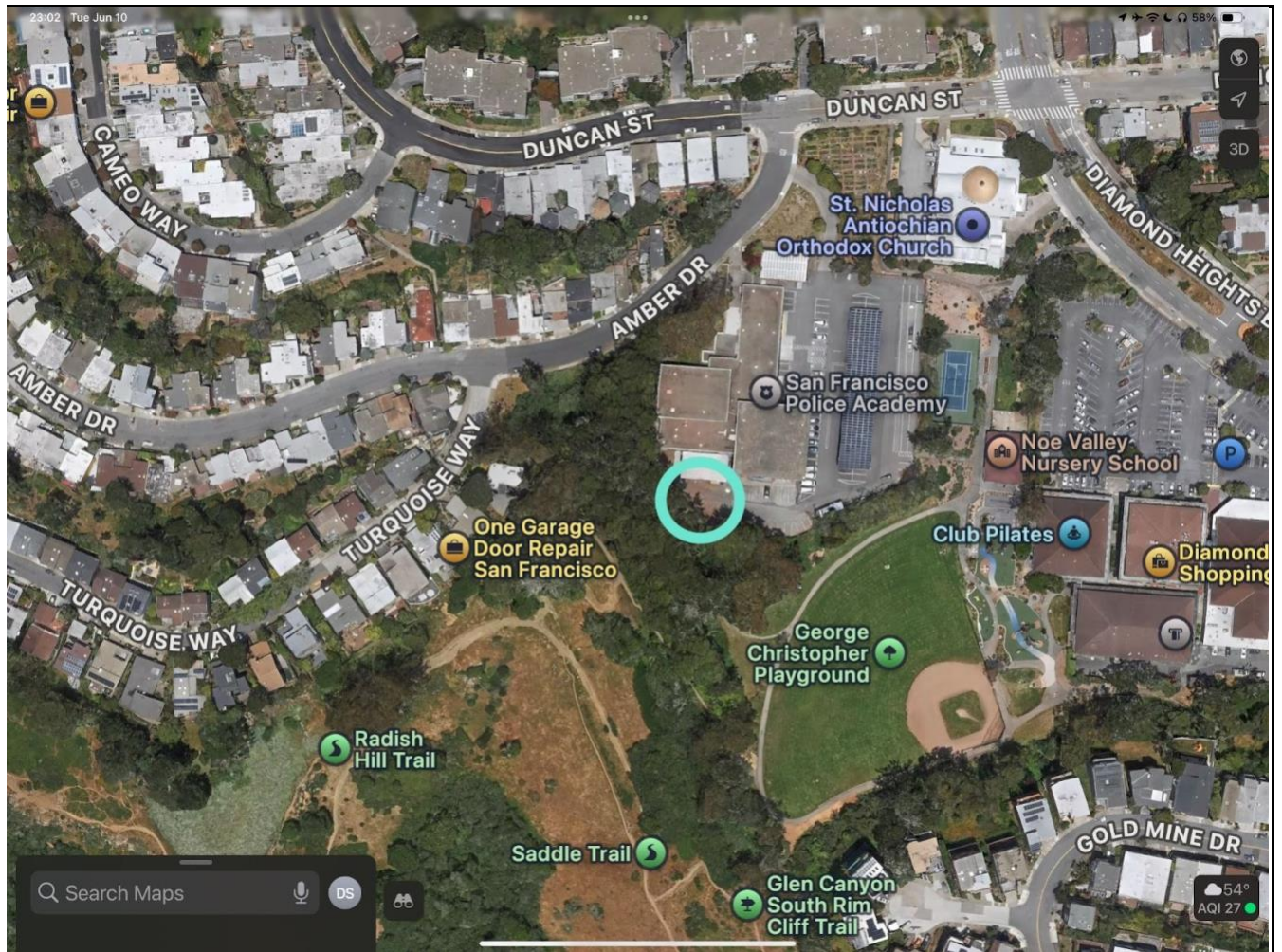
Rendering of Macro Tower from George Christopher park. See more photos in Appendix A.



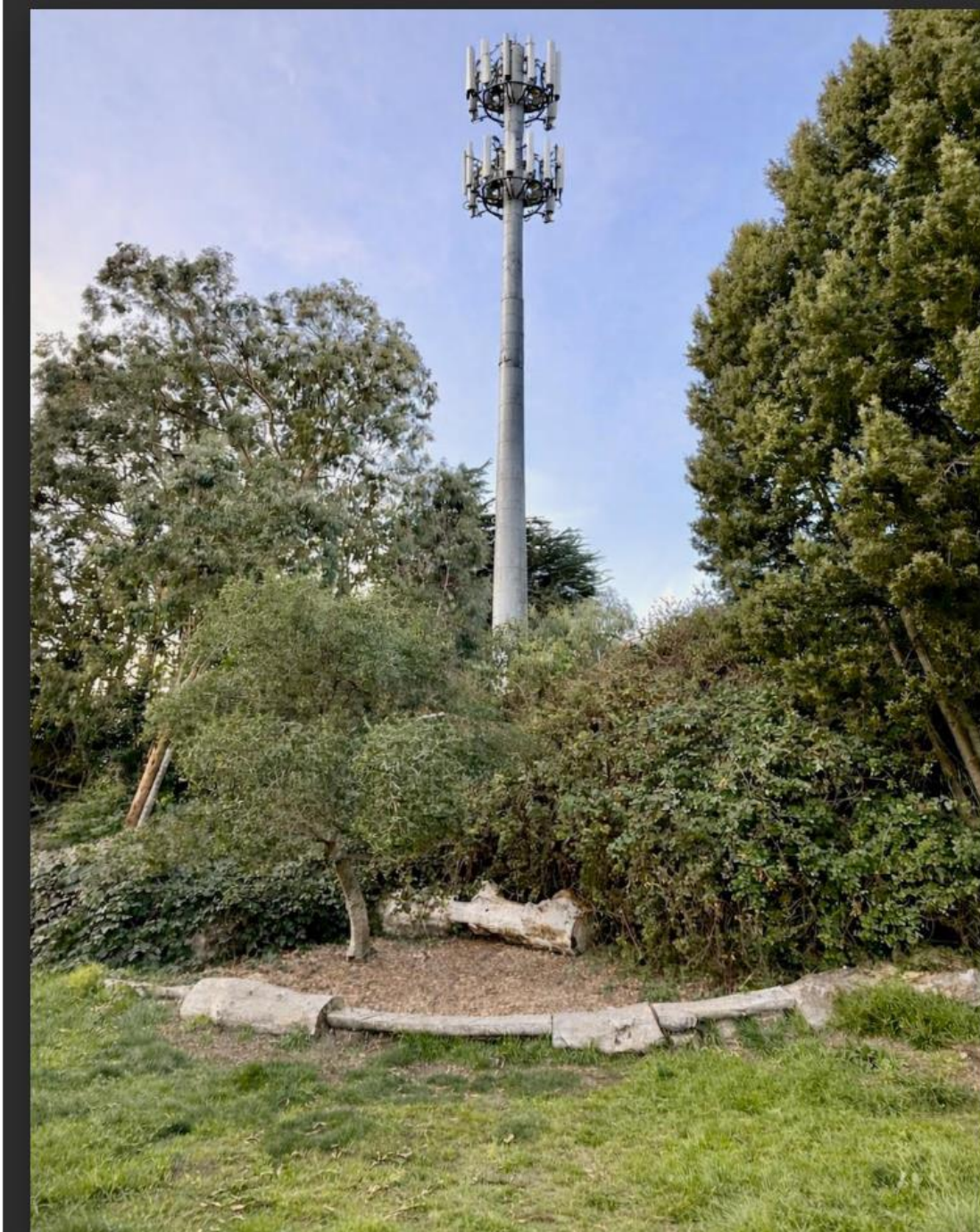
Proposed location for the Macro Tower amid the 80+ foot trees behind the Police Academy. This is currently a parking area. The roots of the trees adjacent to the monopole site will be damaged jeopardizing the root system of the surrounding forest on the edge of Glen Canyon and George Christopher Playground. The fence is the property line of both parks.



Note the proximity to the canyon and the playground and nursery school and the density of the surrounding homes.



ATT Map of the area for the proposed site. The adjacent (left) Glen Canyon is steep, the area above Christopher Playground (built on infill) where the Academy is, goes uphill as does the area below the playground. The area under the Police Academy label is the “parking lot”. The area next to St. Nicholas Church is a community garden where neighbors enjoy the open sky and outdoors.



Planning Document from Sunshine request. Different angle from what was in AT&T's application. It shows how imposing the tower will be over the park. Rendering of **double layer antenna**. Renderings in application were from different angles that made the tower look much smaller.

AT&T would not commit to leaving the Tower as a single antenna. Only a building permit is required to add a layer of antennas. This will make the tower heavier, bulkier and uglier.

AT&T will be able to rent space/spectrum to other carriers and make additional money from the tower.





There are **only FOUR macro towers of this size or larger in San Francisco:**

2 attached to downtown buildings, 1 @ Balboa BART, 1 @ Presidio Sports Basement parking lot: others named by Planning & AT&T- 93 foot @ Alemany/SanBruno-101/280, 90-foot @101 onramp to Golden Gate Bridge, 80-foot on 101 at hospital curve. Recently approved: 90 foot in parking lot of Palace of Fine Arts, 60-foot GGPark @Soccer Fields, and 40-foot @ 1475 25th Str - industrial location with some residences. While the last 2 are in parks, the Palace of Fine Arts is mostly water, and the soccer fields have no trees - neither are surrounded by residential zone (RH-1). See appendix photos

Diamond Heights neighbors seek less intrusive, better engineered wireless antenna solutions which do exist, for areas with areas Hammett & Edison (AT&T's independent consultants) identified as having weak signals (Appendix L). AT&T refused to consider any alternate structures. Yet other wireless carriers such as Verizon and T-Mobile have good coverage deploying alternatives such as Small Cells & Distributed Antenna Systems (DAS) which are deployed in safer and less intrusive locations.

1. Summary: Planning, Code and General Plan (CEQA & CUA) issues

A. Open Space, Views, Neighborhood Character and Historic Preservation

- **Planning Code** requires that open space be prioritized and that new structures preserve vistas and the visual character of historic neighborhoods.
- *The Tower frustrates the General Plan's goal that parks and open spaces should be protected from development.*
- *The massive tower would rise **20 feet above the tree line**, blighting the skyline, harming views from parks, playgrounds, and homes putting it at odds with the unique charm and the nature and park character of the neighborhood.*
- *The neighborhood has "modernist" architectural design which the Planning Dept determined made it eligible for state and local **historic** registration (2018).*
- **Property value studies** (Appendix B), **Six local realtors confirm that the tower will reduce nearby home values.** The California Association of Realtors' Property Sellers Questionnaire #15 ([Form SPQ, Revised 6/18](#)) specifically lists both "cell phone towers" and "high voltage transmission lines" on the disclosure form as "a potential problem" source. *This required warning will decrease property values compared to comparable property without cell towers.*
- **The General Plan calls for the Police Academy to move - the property may be impossible to sell with a 10-story bulky antenna structure on it. And if vacated security will be an issue (see graffiti on the 777 Potrero Hwy 101 pole)**
- **Planning's Wireless Facility Guidelines Priority 1 is for placement on Public Structures.** *This not "on or attached to a structure" or building, it is a free standing structure. It does not comply with the Planning Dept's guidelines.*
- **CEQA: This is NOT a small addition to an existing structure. It is a NEW large structure with a bulky 700+ cubic foot antenna array on top of a 104' pole.**
- The project is in a *significant natural resource area* and adjacent to a historic district, precluding categorical exemption and requiring a full EIR.
- **The City of San Francisco has made biodiversity a priority.** *The tower itself threatens the health of the forest surrounding it that hosts migrating birds, hawks, and owls who will be at risk for collisions.*

B. Not "Necessary or Desirable and Compatible with the neighborhood"

- **Necessary or Desirable Standard:**
 - In the words of the Commission Vice Chair Moore: **"This does not rise to the high bar of the necessary or desirable standard."**

- Necessary or Desirable should not be according to a corporate applicant applying to use public property and infringing on the neighborhood enjoyment. Commissioner Imperial noted, “it is only necessary and desirable for AT&T.”
- Public outcry with nearly 200 comments (to date) opposing the project demonstrates that it is not necessary or desirable and compatible with the neighborhood.
- Four out of seven Planning Commissioners based their vote on AT&T’s claim that FirstNet was *necessary* for emergency first responders yet both SFFD and SFPD have confirmed they do **not** require firefighters and police officers to use FirstNet for emergency response.
- **It’s not necessary: AT&T’s own documents show only “relatively weak”** signal in a few areas, not a coverage gap. Federal law (Telecommunications Act) only prohibits denial if there is a *complete* service gap, which is **not the case here**. There are ways to strengthen signal in those areas without a MacroTower. (Appendix L Hammet & Edison statement highlighted)
- **It is NOT necessary because alternatives exist, yet AT&T has refused to consider safer, less intrusive alternatives.**
- **Denying the project would NOT be a “prohibition of service.”** Other carriers provide coverage, and alternative, less intrusive methods exist. A
- **AT&T states it’s the City’s responsibility to find alternatives (sites and systems).** There is no documentation that the city endeavored to identify possible alternate sites and system, rather they just took for granted AT&T’s insistence that there were none. Ironically AT&T highlighted the lack of coverage at the Safeway Shopping Center and at St. Nicholas Antiochian Orthodox Church and then AT&T pointed out that both those locations refused to allow antenna structures on their properties.

2. Refuting AT&T’s Arguments

AT&T Argument	Factual Response
“Necessary or Desirable” for emergency/FirstNet and compatible with the neighborhood,	SFFD/SFPD do not require FirstNet; signal boosters and other carriers suffice; no coverage gap. Not Desirable Adequate neighborhood coverage can be achieved (and is for T-Mobile & Verizon without a giant MacroTower. The surrounding neighborhood is zoned as residential 2-3 stories. This is a 10-story structure. The parks are where people gather to see trees and sky - not an industrial electric tower.

“No fire or geological risk”	The site is geologically unstable, on infill, close to a landslide risk area. Fire Chief described the as having the characteristics of a WUI-, This electrical structure literally positioned amid mature trees in a windy neighborhood surrounded by dry grass with a diesel tank on red flag days. One branch, bird collision, loose wire could cause arc. Paradise didn't think there was a fire risk either.
“Complies with all fire codes”	Local and state codes are <i>not</i> sufficient; Malibu and LA County now require higher standards after telecom fire disasters. Past fires in Chula Vista and Malibu met fire codes.
“No impact on open space/historic resource”	The tower would dominate views from <u>and of the park and views of the sky</u>, as well as interrupt historic architectural design, lower property values, and make the entire Police Academy property less valuable when the Police Academy moves to a modern facility per the General Plan.
“No alternatives available”	AT&T and the Planning Dept did NOT consider less intrusive technologies and <i>all</i> possible locations. They looked a 7 and did NOT consider alternative antenna structures and systems.
“Denial is a prohibition of service (TCA)”	Federal law only prohibits denial when there is a proven gap in coverage exists - AT&T's consultant only identified areas of relatively weak signal which do not require a MacroTower to strengthen, and, there are no alternatives; to provide coverage. A relevant legal test in the Ninth Circuit is whether the City's denial would “materially inhibit” wireless service development, which AT&T cannot show. Existing coverage is not completely lacking or unusable and can be improved with alternative systems.
“There are other towers of this size throughout the city near parks and in residential areas and recently approved with Class 3 exemptions”	There are only FOUR macro towers of this size or larger in San Francisco: 2 attached to downtown buildings, 1 @ Balboa BART, 1 @ Presidio Sports Basement parking lot: others

	named by Planning & AT&T- 93-foot @ Alameny/SanBruno-101/280, 90-foot @101 onramp to Golden Gate Bridge, 80- foot on 101 at hospital curve. Recently approved: 90- foot in parking lot of Palace of Fine Arts, 60- foot GGPark @Soccer Fields, and 40- foot @ 1475 25th Str - industrial location with some residences. While the last 2 are in parks, the Palace of Fine Arts is mostly water, and the soccer fields have no trees - none are surrounded by residential zone (RH-1).
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3. Summary Community, Historic, and Environmental Impacts

- **Community Opposition:** nearly 200 letters of opposition (as of 2.1.26) 81 signatures on appeal application, 83 letters +6 realtors and 2 experts received and after waiting 4 hours, testimony from 30 residents. 13 messages in favor and no testimony in favor.
- **Negative precedent:** Approving would open every residential neighborhood and park throughout the city to similar 10-story tower installations using “necessary and desirable for emergencies” and requiring “FirstNet” (even though Police & Fire do not require FirstNet). *There are NO antenna structures of this size in residential neighborhoods and near 2 parks.*
- **Wildlife Impact:** AT&T claims no impact because wildlife is “200 feet away,” but birds, insects, and mammals range beyond well 200 feet, research documents bird collisions/electrocutions especially in forested areas, foggy and windy areas. Potential fire or landslide would devastate habitats. **Board of Supervisors Resolution #107-18 (April 17, 2018)** "Resolution establishing local biodiversity as a citywide priority, with a framework for interagency collaboration for nature-based initiatives." *Ignored by the Planning Dept.*
- **Aesthetics:** The tower’s mass and industrial appearance are incompatible with the neighborhood’s character and its eligibility for state historic registration with its modernist architectural design preserving views. People enjoy the parks and community garden and want to look up and see trees and the sky not a 10-story bulky antenna complex
- **Process Issues:** AT&T and Planning Department communications reveal bias, inadequate exploration of alternative systems and locations, misleading statements about coverage, incomplete and misleading information about emergency communication and biological resources and disregard for the General Plan and Planning Code.

4. Project Overview & Timeline

- **Location:** 350 Amber Drive, in parking spaces behind Police Academy (not the main parking lot) on the property boundaries of Glen Canyon Park and George Christopher Playground, surrounded by 90-foot trees, a nearby playground, a nursery school, and hundreds of densely designed residential homes and condos.
- **Size:** 104-foot monopole, 20 feet higher than the current tree canopy, with a 700 cubic foot antenna array. Multiple additional structures, including a newly proposed transformer to be placed in the yard in front of Police Academy which is across the street from homes on Amber Drive and Duncan Street. This transformer was not in the plan approved by the Planning Commission.
- **Zoning:** Public and Open Space. The General Plan and Planning Code prioritize protection of open space, vistas, and neighborhood character.
- **Timeline:**
 - **2023:** AT&T created plans for the Tower (learned after June 2025 via Public Disclosure Request)
 - **April 2024:** Neighbors notified by USPS the only community meeting held by AT&T to gather feedback from the affected neighborhoods.
 - **June 2025:** Planning Commission hearing notices sent to property owners within 300 feet
 - **July 2025: Planning Commission** hearing continued - AT&T staff absent
 - **August 2025:** Hearing again continued at AT&T's request
 - **September 2025:** Planning Commission hearing: Commissioners voted **4-3** for approval based on the inaccurate information that stated FirstNet was needed by first responders. 30+ residents attended in opposition and no one speaking in support; 83 opposition letters submitted including letters from former Supervisor Avalos (who authored SF Wireless Aesthetics Ordinance upheld by CA Supreme Court) & former Supervisor/Senator Mark Leno.
 - Planning Dept. report under-counted opposition letters and inaccurately described the letters as mostly mentioning health effects of Radio Frequency Radiation (RFR) there were only 13 out of 83. Rather letter writers primarily spoke to safety concerns, aesthetics, and preserving views and harmony from all viewpoints in the neighborhood. They emphasized the lack of necessity for such a large structure when less intrusive alternatives exist.
 - **October 2025:** CEQA appeal filed and approved for hearing; signatures gathered for CUA appeal were initially rejected by DPW, a decision later reversed
 - **Nov-Dec 2025: CUA** appeal qualified; hearing scheduled for Dec 9, then continued to Feb 10 due to short notice

5. Planning Commission Was Misled

The "Planning Commission Findings" and AT&T both claim that this Tower is necessary to improve safety because of emergency FirstNet communication. SF Police and Fire do not require AT&T's FirstNet service. If they decide to use FirstNet, FirstNet boosters are available for AT&T cell phones. A wireless structure of this massive size is not necessary for communication even in the canyon. Other wireless carriers provide reliable service without a monopole.

Additional discrepancies in the Commission's findings include:

(Planning statements are in quotation marks and not italicized . The italicized statements are from the author of this document.)

- **“Finding #11. Coverage and Capacity Verification.** The maps, data and conclusion provided by AT&T demonstrate need for outdoor and indoor coverage and capacity have been determined by Hammet & Edison, an engineering consultant and independent third party, to accurately represent the carrier's present and post-installation conclusions.”
 - *Hammet & Edison summarized their findings describing a “drive by verification of signal” and concluded that “there were areas of relatively weak signal levels” in the carrier's present coverage. (Appendix L) They did not conclude “there's no signal,” or “there's a gap in coverage,” both of which are claims AT&T has made in justifying the need for this tower. The map submitted to show the better 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. This does not mean that a tower with 12 antennas on a 104-foot pole is required; in fact LESS INTRUSIVE (as required by the TeleCommunications ACT) systems could provide the same coverage. FCC requires demonstrating a “gap in coverage” - the “computer modulated” maps are just that, computer modulated. AT&T maps provided to FCC show complete coverage as do their maps when comparing coverage online.*
- **Finding #13. Planning Code Compliance.** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code.
 - “Code Sec 303 establishes criteria and requires for the Planning Commission to consider them when reviewing applications for Conditional Use authorization. On balance, the project complies with said criteria in that: **A. Planning Code Section 303** a proposed new use and building, **at the size and intensity contemplated** and **at the proposed location will provide a development that is necessary or desirable and compatible with the neighborhood or the community.**”

Only AT&T finds their new massive Tower as necessary or desirable and compatible with the neighborhood or community. It is not necessary. The Telecommunications Act requires that Wireless Facilities use the Least Intrusive Technology. There are less intrusive, better-engineered antenna systems available to provide coverage for the areas of the neighborhood where AT&T signal is "relatively weak" as described by AT&T's coverage expert. Other carriers (Verizon, T-Mobile) have good coverage in the area and they do not have 10-story MacroTowers in the neighborhood. We met with AT&T and Supervisor Mandelman and asked directly if they would consider a less intrusive system and they said no because it was not “consistent with their business goals.”
 - “The Project at 350 Amber Drive is generally desirable and compatible with the surrounding neighborhood because the Project will not conflict with the existing uses of the property and will be designed to be compatible with the surrounding nature of the vicinity.”

It is not desirable, and it is not compatible with the nature of the surrounding vicinity. The surrounding vicinity includes two parks that are bordered by forest of aging 90-foot trees as well as 2- and 3-story homes.

- *The neighborhood is famous for its historic “modernist” architecture with low rooflines, curving along the hillsides, blending with nature and preserving views of the park and canyon from all over the neighborhood. The utilities were undergrounded when it was built to preserve the view of the open space sky. Putting a giant industrial antenna array 20 feet above the tree line and skyline WILL conflict with the uses of the property immediately adjacent which is to enjoy nature and the open sky. It WILL impede that enjoyment of nature.*
- “The proposed monopole will be painted brown and located adjacent to a grove of Eucalyptus trees to minimize visual impacts.”
Painting the pole brown will not camouflage the 700 cubic feet of antennas in the sky above the tree line. In addition, AT&T refused to agree that they would not add another layer of antennas (which only requires a permit and no additional DPH review) which would double the size. Will they paint the giant antenna array above the trees blue as they did to the multilayer Macro Antenna on 101 at Hospital Curve? (See Appendix A-photos of this antenna over 14 years and the disappearance of nearby trees). The antenna will be visible from the street and from more than 300 2- and 3-story homes on the hillsides above the Police Academy. Painted or not it cannot blend with the tree canopy, it will also be visible from the parks themselves where it will blight views of both the trees and the sky regardless of the color it is painted.



PROPOSED



Rendering of MacroTower painted brown - submitted to Planning but not included in AT&T application.

- “The overall location, setback from public streets, height and design of the proposed facility, including the visual screening elements is situated to avoid intrusion **into public vistas** and to ensure harmony with the existing neighborhood character and promote public safety.”

Eighty-three letters of opposition were received by the Commission and 30 people spoke in opposition at the hearing. Almost all of them talked about the importance of the unobstructed views from all over the neighborhood.

*The height, bulk and design of the proposed facility "including the visual screening elements" **cannot avoid being an intrusion into public vistas** of the park and the open space sky. The antenna array **WILL** interrupt the harmony of the forest and the parks, and it will put an industrial structure into a peaceful well-used park. It will NOT be in*

harmony with the existing neighborhood character. It will NOT promote public safety. It is established that police and fire fighters do not use FirstNet and all 911 calls from the neighborhood are automatically picked up by the closest carrier

- “The Project is necessary in order to achieve sufficient indoor and outdoor 4G LTE mobile coverage and data capacity. Recent drive tests in the subject area conducted by the AT&T Mobility Radio Frequency Engineering Team provide that the Project Site is a preferable location, based on factors including quality of coverage and aesthetics.”

The location is not a “preferable location for aesthetics” and it is not the only location that could provide quality coverage for the neighborhood. Achieving 4G LTE coverage and data capacity can be accomplished without a MACROTOWER in a neighborhood over 2 parks. Other carriers have good coverage. A short drive in the area found a potential location off O’Shaughnessy Boulevard at the end of the upper parking lot behind McAteer high school; there are no homes that would look down on it. The Juvenile Justice Center has property, just to name two in one quick drive around,

Finding 14

Conditional Use Findings

A.

- **The above sections describe this in NOT Necessary or Desirable and NOT compatible with the neighborhood.**
- **It will conflict with the existing uses of the vicinity which are to be in nature, among trees with views of the sky uninterrupted by a BULKY BROWN antenna array 10-feet above the tree line.**
- **The project is no longer set back from public streets. As of January 12 (after the Planning Commission approved the application), AT&T is adding IN FRONT of the Police Academy, next to the sidewalk - a transformer. This is across the street from residents! What else will they be adding?**

NOTE: AT&T added to its plans a transformer building in front of the Police academy just last month. It will be very visible along the sidewalk on Amber Drive where people walk to access Glen Canyon. And it is directly across from Duncan and Amber neighbors who now enjoy the sounds of the wind and birds NOT a transformer.

From Cammy Blackstone AT&T Jan 13:As for the PGE Design / Transformer location. The current proposed location is where the SFPD and City preferred, approximately where the red X is below. This has been submitted to PGE for review. PGE was scheduled to go out to the area to open a few manholes to do some due diligence on the existing underground infrastructure in the area around Christmas but this was postponed due to the PGE outage issues at that time. It is supposed to be rescheduled in the next week or so at which point we will receive some feedback from the PGE engineers on our proposal. I believe the agreement will be between PGE and SFPUC and SFPUC will be the one providing power to AT&T.



- *It is not a preferable location - coverage can be achieved without a Macro Tower, there are other locations.*

B.

- *Equipment and cabinets will NOT be “located behind the academy and not be visible from the public street.” see NEW transformer above*

D.

- *The project does conflict with existing uses of the property (enjoying open space and parks) and is NOT compatible with the surrounding neighborhood. It will be an intrusion on public vistas, and will not ensure harmony with the existing neighborhood character. It will not promote public safety. In fact judging from other poles it will be a target for graffiti (see 777 Potrero pole).*
- *There is not a coverage gap. According to AT&T’s independent consultant there are areas of “relatively weak signal” they do not require a Macro Tower to solve! “It will meet the needs of the immediate neighborhood.”*

Finding 15. General Plan Compliance

- Ensure that Open Space is Safe and Secure
An unstaffed electric structure with an 8 foot fence is hardly safe and secure in the middle of parks and neighborhoods. Coverage capacity can be achieved without a MacroTower.

Manage Economic Growth and Change to ensure enhancement of the total City Living and Working Environment.

1.1 Encourage development, which provides substantial net benefits and minimizes undesirable consequences. Discourage development, which has substantial undesirable consequences that cannot be mitigated. - “The project will enhance the total city living and working environment by providing communication services for residents and workers within the City. Additionally, the Project would comply with Federal, State and Local performance standards”

A Macro Tower is not necessary to meet the above goal.

Objective 2. Maintain and enhance a sound and diverse economic base and fiscal structure for the city. 2.1 Seek to retain existing commercial and industrial activity and to attract new such activity to the city. 2.3 Maintain a favorable social and cultural climate in the city in order to enhance its attractiveness as a firm location. "The site will be an integral part of a new wireless communications network that will enhance the City's diverse economic base.

The Macro Tower will be detrimental to the cultural climate which centers around activity and the park and in the churches. Park goers and church goers do not want a MacroTower.

The only commercial area in the neighborhood is the shopping center. It is full and busy. This answer is absurd

The subsequent Policies are not relevant even though AT&T has made up answers for them

Immediate disaster: ***Fire and Police do NOT use FirstNet and 911 calls are routed to the closest carrier.*** Seismic safety requirements met. ***The saturation of the soil over time cannot be predicted the School closed because it was sliding down the hill.***

Landmarks and historic buildings.

The entire neighborhood is according to the Planning Department eligible for state and local historic registration. See comments above

16. Shadow findings. *The structure WILL add shadows and prevent sunlight on the tennis courts, in and around the nursery school, in the children's playground and the ball field as well as in Glen Canyon. Neighbors were not noticed of Rec & Parc commission meeting and would have opposed their resolution had they been notified. Kids need sunlight especially in foggy San Francisco.*

17. *This project is NOT consistent with and will NOT promote the general and specific purposes of the code: It will NOT contribute to the character and stability of the neighborhood, and would NOT constitute a beneficial development.*

The above contradictions to the Planning Departments statements (which, by the way, were written by AT&T according to communication received through a public records request) speak to Planning Code sec 303: Necessary or Desirable and compatible with the neighborhood or the community. Additional contradictions in the findings will be sent separately.

*

6. Class 3 Exemption - A Full EIR Is Required

1. The **CEQA Class 3 Exemption** applies only to **small new facilities or structures.**
2. AT&T and Planning rely on an inaccurate rendition of Class 3 CEQA exemptions rather than the actual language and scope contained in the CEQA guidelines.

3. AT&T's proposed tower is 104 feet tall with a 700 cubic foot antenna array 20 feet above the tree line requiring "shadow findings"- it cannot be reasonably considered a small structure and is not permitted under the Height and Bulk regulations for Open Space (OS) zones.
- Section 290 (Open Space Height & Bulk): the height and bulk of buildings and structures shall be determined in accordance with the objectives, principles and policies of the General Plan, and no building or structure or addition thereto shall be permitted unless in conformity with the General Plan. The inclusion of land in Open Space Districts is intended to indicate its principal or exclusive purpose as open space with future development of any character strictly limited. The exemptions from height and bulk limitations set forth in Section [260](#) (b) of this Code shall not be applicable to Open Space Districts unless in conformity with the General Plan.

4. **Bulk limit special exceptions do not apply for this project**

Criteria. City Planning Commission shall consider the following standards and criteria in addition to those stated in Sections [303](#) (c) and [329](#) of this Code:

(1) The appearance of bulk in the building, structure or development shall be reduced by means of at least one and preferably a combination of the following factors, so as to produce the impression of an aggregate of parts rather than a single building mass:

- (A) Major variations in the planes of wall surfaces, in either depth or direction, that significantly alter the mass;
- (B) **Significant differences in the heights of various portions of the building, structure or development that divide the mass into distinct elements;**
- (C) Differences in materials, colors or scales of the facades that produce separate major elements;
- (D) Compensation for those portions of the building, structure or development that may exceed the bulk limits by corresponding reduction of other portions below the maximum bulk permitted; and
- (E) In cases where two or more buildings, structures or towers are contained within a single development, a wide separation between such buildings, structures or towers.

(2) In every case the building, structure or development shall be made compatible with the character and development of the surrounding area by means of all of the following factors:

- (A) A silhouette harmonious with natural land-forms and building patterns, including the patterns produced by height limits.

The silhouette of a massive tower in the sky CANNOT be made compatible and harmonious with natural land-forms and building patterns.

- (B) Either maintenance of an overall height similar to that of surrounding development or a sensitive transition, where appropriate, to development of a dissimilar character

A structure of this height CANNOT be made similar to that of the surrounding tree canopy and its height or of the nearby buildings and a sensitive transition is not proposed.

- (C) Use of materials, colors and scales either similar to or harmonizing with those of nearby development.

Painting the pole (and the antennas?) brown will not harmonize with the nearby forest and blue antennas will still mar the view of the sky.

- (D) Preservation or enhancement of the pedestrian environment by maintenance of pleasant scale and visual interest.

Pedestrians (and there are many on the sidewalk), at the address and in the two parks, want to look up and see the sky, not an industrial electric tower.

(3) While the above factors must be present to a considerable degree for any bulk limit to be exceeded, these factors must be present to a greater degree where both the maximum length and the maximum diagonal dimension are to be exceeded than where only one maximum dimension is to be exceeded.

It is difficult to translate the regulations that are applied to buildings (for measurements of bulk length and diameter) to a 104-foot (10-story) pole and tower array. There are no bulk measurement regulations for the top of tree canopies because of the incongruency with the surrounding trees and the RH-1 (3-4 story) height limits in the surrounding neighborhood.

5. Zoning

The Planning Department designates the location as in a Public Zone (because it was originally a school) and OS-Open Space but fails to describe the surrounding neighborhood zoning. **Class 3 structures require zoning to be similar when they are considered.**

RH-1. The area surrounding Glen Canyon and the Police Academy is zoned as residential: Such areas tend to have similarity of building styles and predominantly contain large units suitable for family occupancy, considerable open space, and limited nonresidential uses. SF Zoning Map (enter 350 Amber and zoom in). Four stories is the height limit. (*not 10-stories*) This structure is well beyond the height of the surrounding neighborhood structures.

<https://experience.arcgis.com/experience/573d02b43b7b46e381df04b7f225da95>

Restrictions within RH-1 [SEC. 209.1. RH \(RESIDENTIAL, HOUSE\) DISTRICTS.](#)

Other CEQA Class 3 Exemptions: Both AT&T and Planning cite examples of other CEQA Class 3 Tower exemptions, including some approved in 2025.

(Photos of examples all are attached). NONE of them are comparable; they are near highways, in industrial zones, in large parking lots and not in residential areas that are immediately adjacent to two parks (one of which includes significant natural resources).

6. Historic Resource

Diamond Heights is eligible for state and national listing as a **Stage I historic district**. [Find the Planning Department's Historic Review Evaluation](#) The Planning Department's Historic Review Evaluation (June 13, 2018) of a residence at 261 Amber describes Diamond Heights as an important component of the larger Diamond Heights Redevelopment Project Area that had a major impact on San Francisco's built environment which featured famous architects and developers including Joseph Eichler, Vernon DeMars, Claude Oakland, Raymond Galli, among others. Diamond Heights was thus envisioned as a new residential neighborhood with modern subdivision site-planning characteristics such as limited **neighborhood access and curvilinear streets allowing for grand views and development on steep slopes**. It is described on the SF Planning web page for 350 Amber [in SF Modern Architecture p. 46](#).

The site plan, designed by Vernon DeMars in 1951, intended a complete community, with various housing types, plus a shopping center, churches, playgrounds, schools, and a firehouse. The neighborhood was master planned in the 1960s and the neighborhood's origins were to conform to a **low-profile footprint**. It was the **first neighborhood to underground all wires to preserve views of nature and the sky**.

- *A vertical metal electrical structure **10 stories high is not part of that Modernist aesthetic**. We must protect the character of this historic architectural area. The proposed massive structure towering above the tree line will damage the harmony and character of the historical architecture.*
- *A 104-foot tower in an eligible historic district which was specifically planned to avoid such structures is inherently intrusive. Refer to Articles 10 and 11 regarding wireless placement in historic districts, as the AT&T report fails to mention these regulations.*

7. Unusual Circumstances Exception

The combination of infill/seismic hazard, fire risk, and proximity to vulnerable populations constitute "unusual circumstances" that mandate a **full Environmental Review**

FCC Policy:

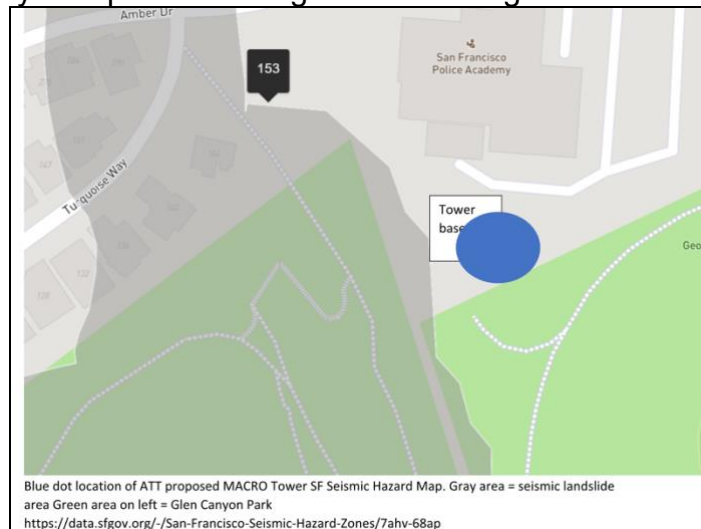
- The FCC has repeatedly stated that "**safety within municipal jurisdiction to regulate**" **San Francisco is fully empowered to set higher standards or deny unsafe projects. Regulation includes denying location and requiring different systems.**

Unprecedented Risk Profile (CEQA Unusual Circumstance)

These hazards endanger Public Health and Safety, residents, historical resources, and significant natural (biological) resources.

Geological Hazard:

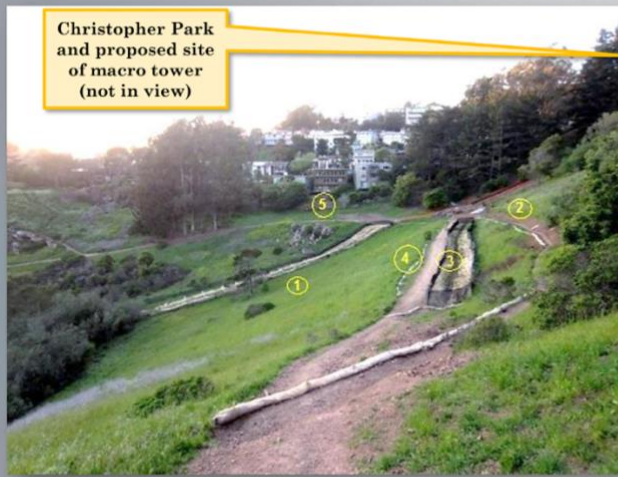
- The site sits **on** infill adjacent to steep slopes with a history of **seismic activity** and soil slippage—see Geotechnical Study (1999) and historic documentation (Appendix H)
- **And it is within 50 to 80 feet of mapped landslide hazard zones** (which are NOT precise) on the same infill as the tower and directly above a recently collapsed retaining wall due to high soil moisture repaired in



2024.



Image 5: Modern Seepage in the Landfill



San Francisco Forest Alliance, April 2014.

Evelyn Rose and the Glen Park Neighborhoods History Project.

6

Saturated soil and work to prevent slippage.

- The Hazards and Resilience Plan by the City and County of San Francisco (2022) states that landslides and minor debris flows were reported during the El Niño storms of February 1998 in Diamond Heights (according to reports by the SF Chief Building Inspector). This report also cites the California Geological Survey that, "steep slopes on hills and cliffs and intermediate slopes with previous landslide deposits are highly susceptible to landslides. In addition, weak saturated soils that are bordered by steep or unsupported embankments or slopes are prone to lateral spreading, which is a type of landslide." -a perfect description for the proposed site of the AT&T Macro Tower- (Appendix F Geology of SF CA by Environmental Engineering Geologists -2018)

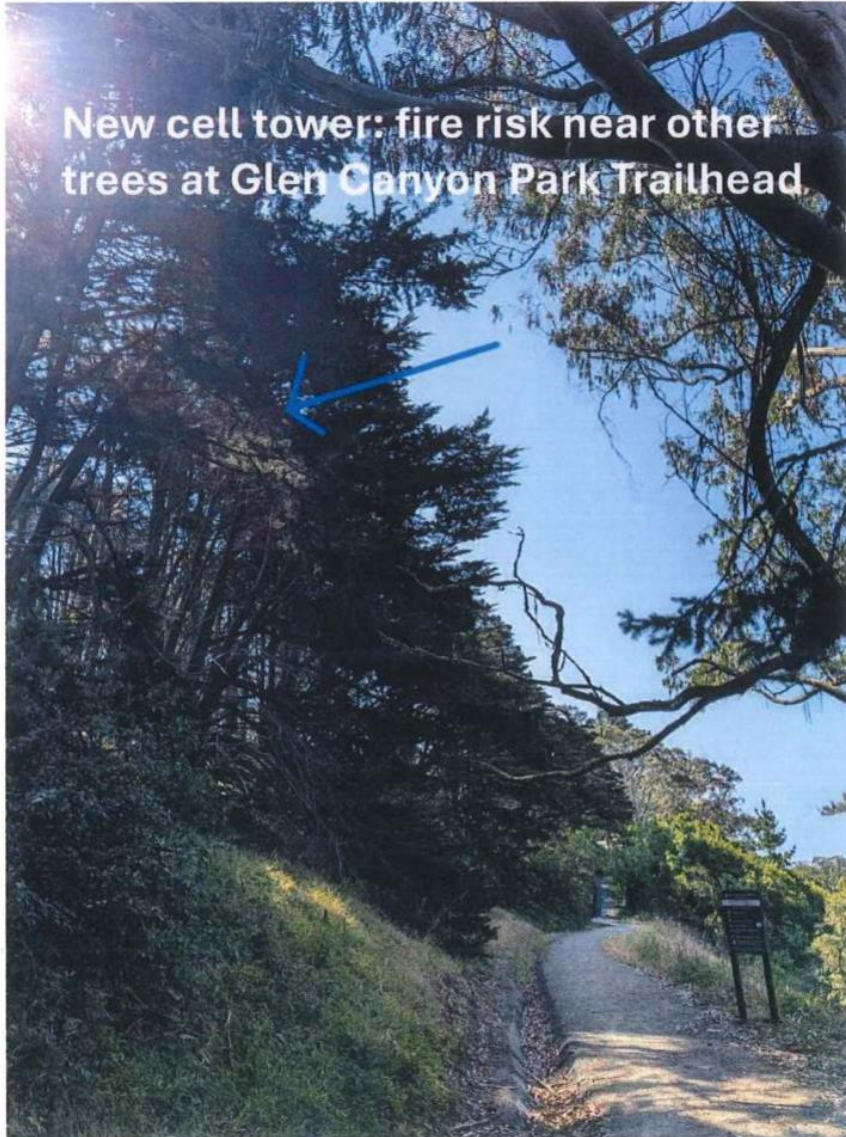


The steep slope in Glen Canyon just below the proposed location

- According to an **arborist**, deep digging for the monopole is likely to **destroy roots and ecosystems of mature trees, along with the trenching required around the entire project may further destabilize the slope.** (Appendix I letter from arborist)

Extreme Fire Hazard: Expert Testimony and Case Studies (Appendix J & Appellant filing)

New cell tower: fire risk near other trees at Glen Canyon Park Trailhead





Bottom of Canyon - tall grass and steep slope

- **Susan Foster, wildfire expert and honorary firefighter** states “A wireless facility may cause electrical fires which are very difficult to extinguish using conventional means. **Firefighters do not fight fires on energized equipment with water due to electrocution risk. The power grid must be cut first and confirmed by PG&E on site. The electrical equipment must de-energize for up to an hour.** AT&T argues that there are fire stations in close proximity. Firefighters can only stand by and protect the perimeter until a utility representative appears and confirms the power has been cut and the entire structure “de-energizes”, a process that may take an hour.
- The 104' wireless facility placed between 90-foot tall aging trees and near a grove of eucalyptus trees in Glen Canyon Park, a children's playground, many dense residences, presents a significant fire hazard challenging, if not impossible, to extinguish, and which may endanger life, safety, and destroy properties nearby.
- **Fire Behavior:**
 - Eucalyptus trees are known to **explode and propel burning embers for miles.**
 - The site is **not officially mapped as a Wildland-Urban Interface (WUI)**, but SFFD has confirmed that it has all the characteristics of a WUI: *tall, dry grass, windy canyon, red flag conditions.*

- Vulnerable populations including children at the playground and nursery school, elderly, and pets would have **extreme difficulty evacuating** on limited egress routes.

- **Historical Telecom Fire Disasters:**

- AT&T asserts there is no proof of fire danger;
- **No government agency systematically tracks telecom tower fires**, and the industry has covered up incidents and failed to report or cooperate with investigations.
- Los Angeles County (the largest county in CA) just last month revised their fire regulations because of the *Palisades fire disaster and tragedy (2024)*. AT&T was named as a plaintiff in lawsuits relating to the *Palisades fire*.
- *Malibu Canyon Fire (2007)* and *Woolsey Fire (2018)*, both telecom-initiated, caused over \$14million and \$6 billion in damages respectively, and 3 deaths. In both cases, delays in wireless power shutdown and deficient engineering were contributing factors.
- *Chula Vista (2021)*: An AT&T pole fire caused by electrical arcing turned the steel pole into molten plasma, destroying adjacent structures. Firefighters could only watch until utility crews confirmed power was off; by then, the pole collapsed and the fire spread.

- AT&T claims the Fire risk is unproven on one hand and on the other states the tower will provide a watchful eye for Canyon fires. On the contrary, it may contribute to them. Fire Risk is proven and documented. Diamond Heights residents have been working with the Fire Department for the last 9 years to make the neighborhood more resilient and to be watchful of the canyon because of the fire risk to residences.

- **Regulatory Gaps and Inadequate Fire Safeguards**

- **San Francisco's building permit process does not and cannot ensure fire safety for telecom towers.**
- **Past fires in Malibu and Chula Vista were at permitted sites.**
- **State/local fire codes are not sufficient.** That is why Malibu and LA County now require the "Fire Safety Protocol," mandating peer-reviewed, signed/sealed engineering plans for telecom towers - something AT&T has refused to provide for this project.

- **Ancillary Hazards:**

- **A backup diesel generator** with a **150-gallon** tank increases risk of vapor ignition and hazardous air emissions near children at the nursery school and playgrounds. AT&T reduced the size from 190-gallons to avoid air quality monitoring requirements.

This Site Operated by: AT&T MOBILITY 501 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 Sheet: CCL05350 Site Address: 300 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.PRESWARNINGS.CA.GOV Avertissement CANCER ET EFFET NOCIF SUR LA REPRODUCTION WWW.PRESWARNINGS.CA.GOV Avertissement PRODUCE CANCER Y D'AMCIS REPRODUCTIFS WWW.PRESWARNINGS.CA.GOV				NOISE AND STRINGS INFORMATION 1. 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 EMP REPORT OR ANY LOCAL, STATE OR FEDERAL GUIDANCE OR REGULATIONS SHOULD BE IN CONFLICT WITH ANY PART OF THESE NOTES OR PLANS. THE MORE RESTRICTIVE GUIDELINE OR REGULATION SHALL BE FOLLOWED AND DEEMED THE LEADER. 2. THE PUBLIC LIMIT OF RF EXPOSURE ALLOWED BY AT&T IS 10W/m² AND THE OCCUPATIONAL LIMIT OF RF EXPOSURE ALLOWED BY AT&T IS 100W/m². IF THE BOTTOM OF THE ANTENNA IS MOUNTED (1) 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 UNIT THEN NO STRINGS OR BARRICADES SHOULD BE NEEDED. 3. 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 ESCAPE) THEN BOTH BARRICADES AND STRINGS SHALL BE PLACED AROUND THE ANTENNA. THE EXACT EXTENT OF THE BARRICADES AND STRINGS SHALL BE DETERMINED BY THE EMP REPORT FOR THE SITE DONE BEFORE OR SHORTLY AFTER COMPLETION OF THE SITE CONSTRUCTION. USE THE PLAN AS A GUIDELINE FOR PLACEMENT OF SUCH BARRICADES AND STRINGS. 4. 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 ESCAPE) THEN BOTH BARRICADES AND STRINGS SHALL BE PLACED AROUND THE ANTENNA. THE EXACT EXTENT OF THE BARRICADES AND STRINGS SHALL BE DETERMINED BY THE EMP REPORT FOR THE SITE DONE BEFORE OR SHORTLY AFTER COMPLETION OF THE SITE CONSTRUCTION. USE THE PLAN AS A GUIDELINE FOR PLACEMENT OF SUCH BARRICADES AND STRINGS. 5. 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 Z39.1 AND THE COMPANY CONTACT INFORMATION (e.g. TELEPHONE NUMBER) TO ARRANGE FOR ACCESS TO THE RESTRICTED AREA. THE TELEPHONE NUMBER SHALL BE PROVIDED TO THE CONTRACTOR BY THE AT&T CONSTRUCTION PROJECT MANAGER AT THE TIME OF CONSTRUCTION. 6. 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 ESCAPE) THEN BOTH BARRICADES AND STRINGS SHALL BE PLACED AROUND THE ANTENNA. THE EXACT EXTENT OF THE BARRICADES AND STRINGS SHALL BE DETERMINED BY THE EMP REPORT FOR THE SITE DONE BEFORE OR SHORTLY AFTER COMPLETION OF THE SITE CONSTRUCTION. USE THE PLAN AS A GUIDELINE FOR PLACEMENT OF SUCH BARRICADES AND STRINGS.																			
INCE COMPOUND SIGNAGE				SCALE: NONE	11	YELLOW EH&S SIGN				SCALE: NONE	7	PROP 65				SCALE: NONE	5														
DANGER NO TRESPASSING				INFORMATION Federal Communications Commission Tower Registration Number 1 2 3 4 5 6 7 Posted in accordance with Federal Communications Commission rules and antenna tower registration AT&T 17A (3). 12"				DIESEL FUEL COMBUSTIBLE NO SMOKING NO OPEN FLAMES FUEL TANK CAPACITY 190 GALS				1 2 0 0																			
INCE 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: 1. CONTRACTOR SHALL INSTALL ALL INFORMATION SIGNAGE IN ACCORDANCE WITH WIRELESS DOCUMENT NO. 001A, RF EXPOSURE POLICY AND RF SAFETY COMPLIANCE PROGRAM, LATEST EDITION. 2. CONTRACTOR SHALL CONTACT AT&T PLUMBER FOR INFORMATION ON WIRE LEVELS AND INSTRUCTIONS ON LEVEL AND LOCATION OF SIGNAGE.				CAUTION				CAUTION				NOTICE											
OR / 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				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 clothing items should be secured for working in RF environment and used as personal RF monitoring or wearing near active antenna. Do not touch any equipment.				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. Do not touch any equipment.				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. Do not touch any equipment.			
PA HAZARD SIGN				SCALE: NONE	12	CABINET DOORS SIGNAGE				SCALE: NONE	8	CAUTION AND WARNING SIGN				SCALE: NONE	3	NOTICE SIGN				SCALE: NONE	1								

Application includes Hazard materials signs to be posted at telecom tower sites

NEW NOISE HAZARD

Transformer structure added by AT&T in January IN FRONT OF Police Academy after Planning Commission action Red "X" marks the spot



- Noise from a newly announced (not approved) transformer in front of the Police Academy across from homes.
- Noise from wind humming through the antennas.

Biological Natural Resources:

The Tower is located at the property boundary of Glen Canyon Park and threatens the biological/natural resources of the Canyon.

SF General Plan REQUIRES protection of biodiversity in natural areas:

Environmental Protection Element - OBJECTIVE 8:

"Ensure the protection of plant and animal life in the city"

POLICY 8.2: "Protect the habitats of known plant and animal species"

POLICY 8.3: "Protect rare and endangered species"

Recreation & Open Space Element - OBJECTIVE 4:

"Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces"

Project does OPPOSITE of "protect and preserve"

POLICY 4.1: "Preserve, protect and restore local biodiversity"

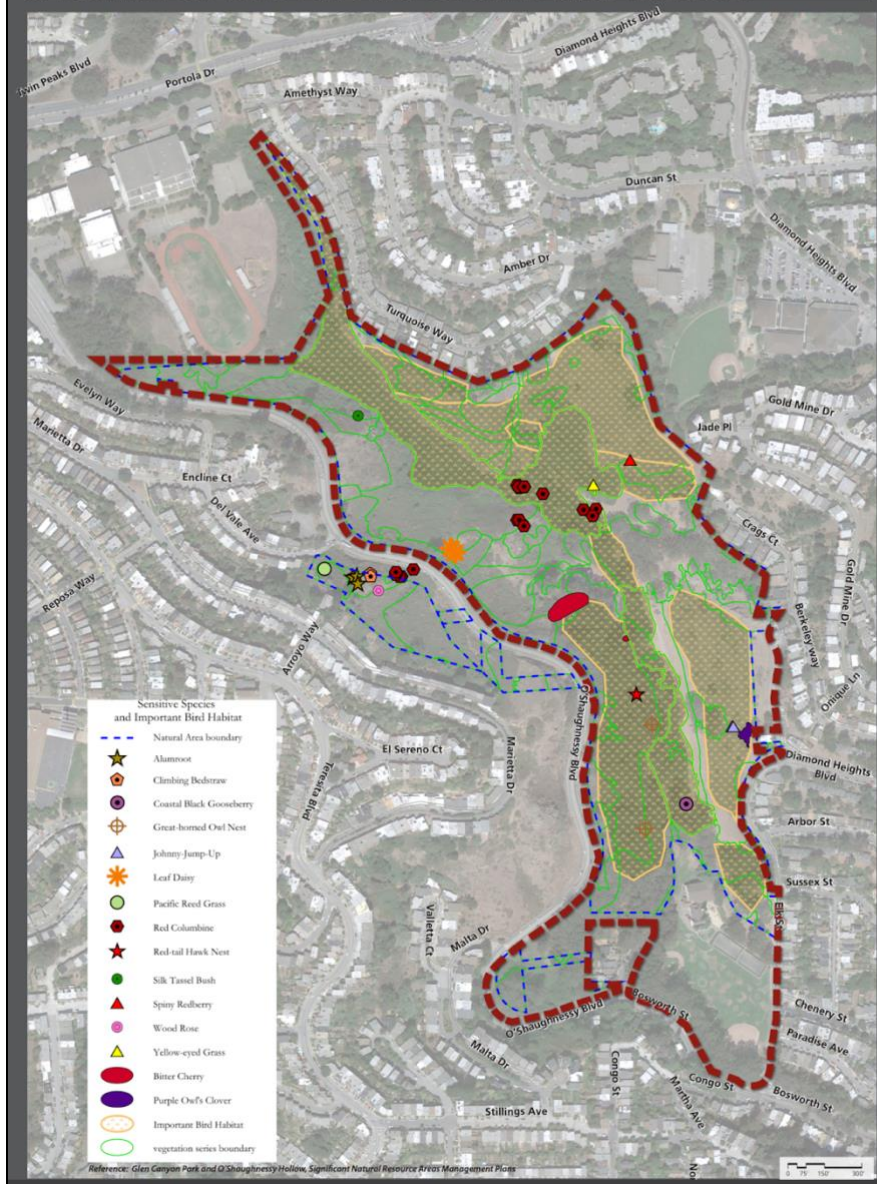
Board Resolution #107-18 (2018) - Biodiversity Policy establishes local biodiversity as a citywide priority, with a framework for interagency collaboration for nature-based initiatives.

San Francisco Department of the Environment has prioritized biodiversity. Yet, no biodiversity analysis was included in the Planning Commission Materials.

Glen Canyon Park is one of San Francisco's "**significant natural resource areas**" with biological diversity and is home to a sensitive important bird habitat (immediately adjacent to the boundary of the project), and the rare blue mission butterfly (according to SF Recreation & Park) as well as native plants. It is a favorite place for neighbors and visitors to walk and hike among nature and it is part of San Francisco's "cross town trail."

Both AT&T and Planning Department response documents reference a 2006 assessment of biological resources by the Recreation and Parks Department. Planning determined that while the interior portions of the adjacent park (which is not part of the project site) supports sensitive species, the natural area boundary is not near the project site and could not be reasonably affected by construction or operation of the proposed project.

SENSITIVE SPECIES AND IMPORTANT BIRD HABITAT



- AT&T and the Planning Department claim that the animals including birds are 200 feet away from the proposed Tower. Really? Any school child could explain that wildlife, including coyotes, and birds are mobile and are seen throughout the neighborhood beyond the park; they do not stay in confined areas.
- The Golden Gate Bird Alliance highlights the dangers for birds (Appendix E).
- Scientific studies document bird-tower collisions worldwide.
- The tower creates a 104-foot obstacle in the birds' flight path.
- Migratory birds use areas, are particularly vulnerable at night.
- There was NO bird strike analysis done for CEQA exemption.
- Glen Canyon hosts ground-nesting birds, owls, hawks, and 250+ insect species.

There is also significant peer reviewed scientific research on the effects of RF/EMF radiation on [insects](#) and [birds](#) and while human health effects cannot by Federal Law be considered in the placement of towers, our precious wildlife (for which the TCA did not set limits) should be considered. Though the U.S. Congress has preempted local governments from basing decisions on the health and environmental impacts of *wireless radiation*— However it does not preempt based on structure and electricity.

7. Recommendations/Conclusion

The Board of Supervisors must grant both the CEQA and CUA appeals for the AT&T Macrotower at 350 Amber Drive. The Board is not limited to the Planning Commission’s biased and inaccurate “findings.” The board can and should insist on an unbiased review of the CEQA determination AND CUA findings. The Board can lawfully deny the project under federal law and denial would not constitute a prohibition of wireless service nor be preempted.

- **CEQA:** Require a full Environmental Impact Report; Class 3 exemption does not apply; “unusual circumstances” are present; significant fire, geological, historical and community impacts.
- **CUA:** The project is *not* necessary for, or desirable for, and compatible with the neighborhood; alternatives exist; it is inconsistent with open space zoning, neighborhood character, historic resource protection, and public safety.
- **Fire and Safety:** Require robust site-specific fire safety protocols (as in Malibu/LA County) and independent engineering review for any future proposal.
- **Set a clear precedent:** San Francisco will not jeopardize its parks, neighborhoods, or historic resources for unnecessary, hazardous corporate infrastructure.

The Board must deny the project and require the preparation of a full Environmental Impact Report (EIR) under CEQA to accurately analyze the scale of the project’s impact on the environment and the neighborhood. This is necessary because it would be the first tower of this mass and scale permitted in a residential neighborhood, associated with seismic and fire risk and its critical setting in one of San Francisco’s Significant Natural Areas.

These appeals will set legal precedent and allow AT&T to “densify their MacroTower network to all residential neighborhoods in San Francisco (as described in recent FCC comments.) San Francisco made history with the historic 2018 unanimous California Supreme Court ruling upholding the San Francisco Personal Wireless Facility Site Permits Ordinance authored by former Supervisor Avalos which codified San Francisco’s authority to consider aesthetics, siting impacts, and neighborhood compatibility when regulating wireless facilities and it ensured transparency and public participation. Supervisors need to affirm the authority guaranteed in this decision (Appendix K).

If San Francisco and elected officials are more concerned about prioritizing corporate interests over residents and homeowners safety and well-being, and allows AT&T to determine all local siting by rejecting these appeals, the board must at least exercise some authority and prohibit a second layer of antennas, ensure compliance with RF testing and noise testing and the Fire Department must update its protocols based on the work done in Malibu and Los Angeles.

Appendices provided electronically

Telecom related fires in California

Multiple high-profile fires in California have been directly linked to telecom equipment failures, resulting in billions in damages, loss of life, and regulatory reforms.

Fire Incident	Location	Year	Cause/Trigger	Damages/Impact	Outcome/Regulatory Response
Malibu Canyon Fire	Malibu, CA	2007	Overloaded utility/telecom pole	\$14M+ property loss	Lawsuits, new fire safety protocols
Woolsey Fire	Malibu, CA	2018	SCE electrical/telecom pole failure	1,643 structures, 3 deaths	SCE found responsible, new protocols
Camp Fire	Butte County, CA	2018	Transmission tower failure	85 deaths, \$16.5B loss	PG&E guilty, \$13.5B settlement
Chula Vista AT&T Tower Fire	Chula Vista, CA	2021	Electric arcing at cell tower	Tower collapse, local damage	Raised engineering concerns
Weiser Wildfire	Weiser, ID	2020	Worker error during maintenance	1,100 acres burned	Emphasized safe work practices

Technical Analysis: Why Telecom Towers Are a Fire Risk

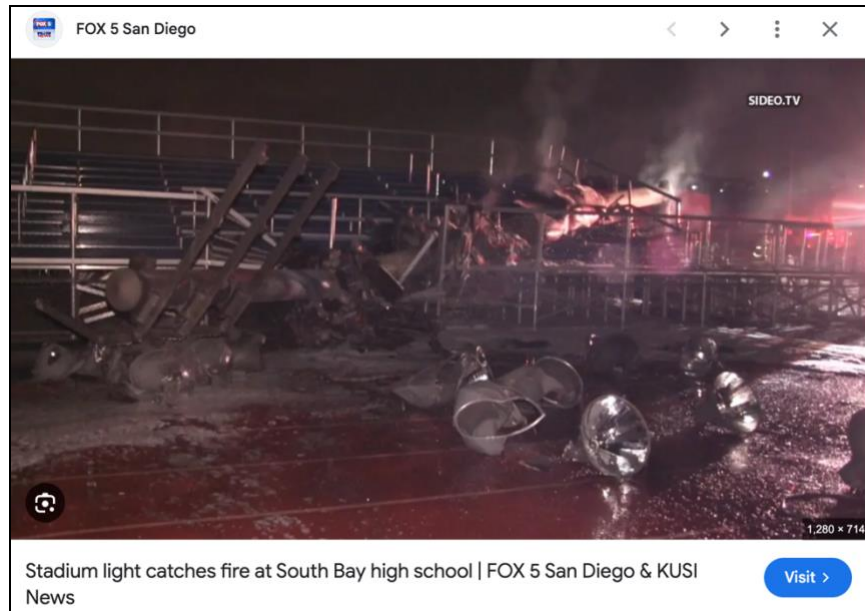
- **Electrical Failures:** Short circuits, arcing, and overheating in telecom power systems are leading ignition sources.
- **Combustible Materials:** Telecom sites contain large volumes of plastic-jacketed cables that burn rapidly and produce toxic smoke.

- **Battery/UPS Failures:** Malfunctioning backup power systems can overheat or explode, starting fires.
- **Environmental Factors:** Siting near flammable vegetation (e.g., eucalyptus groves) or on landfill increases fire spread risk.
- **Firefighting Challenges:** Fires on energized equipment **cannot be extinguished with water until the grid is cut. This shutdown process can take up to an hour, allowing fires to grow unchecked.**
- **For more case studies of telecom fires:**

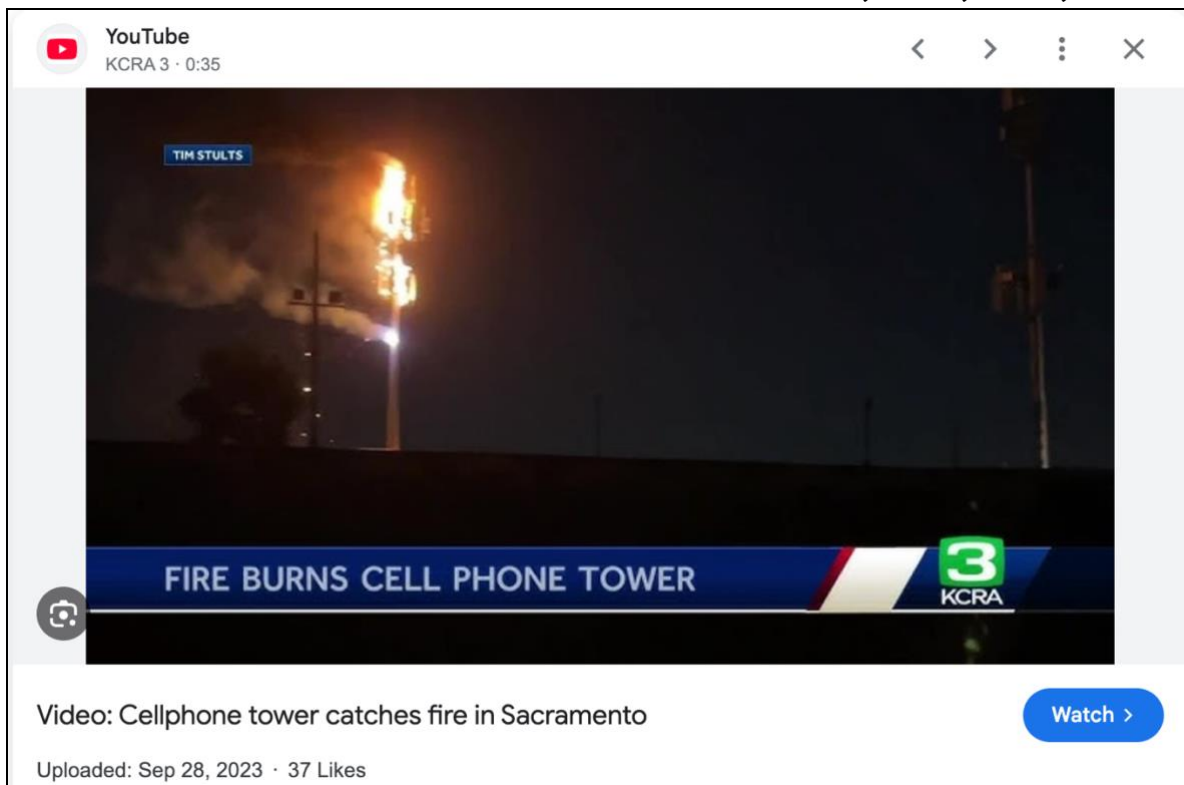
<https://www.ourwebofinconvenienttruths.com/fires-and-collapses/>

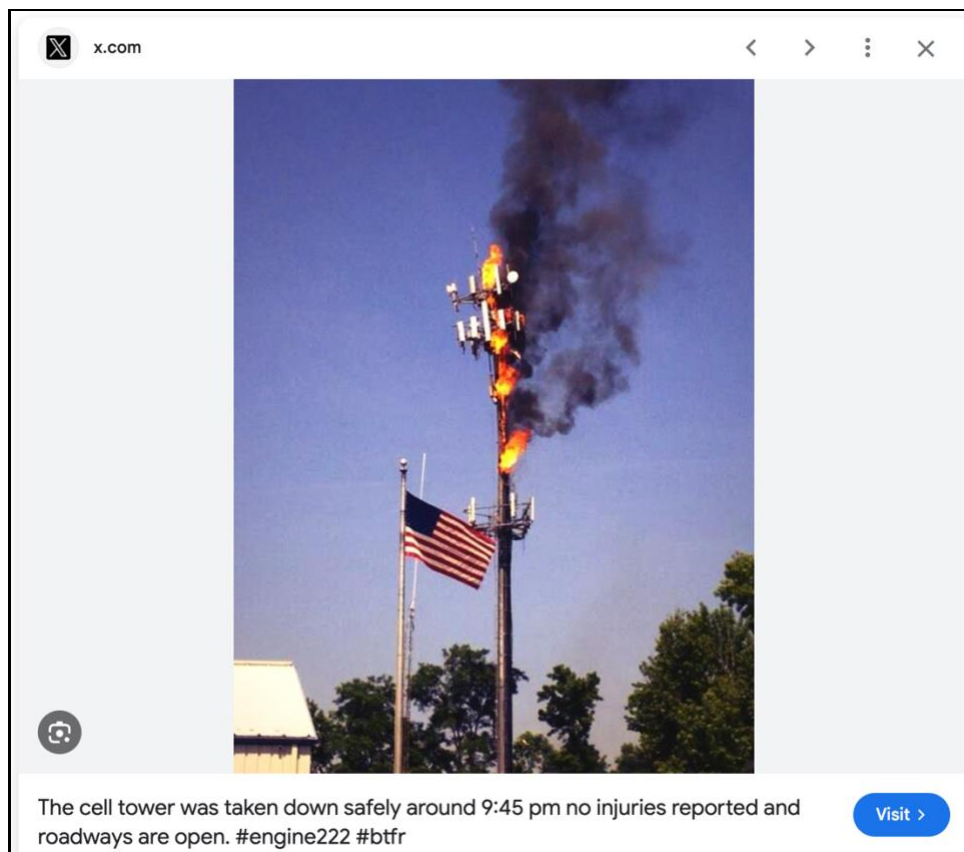
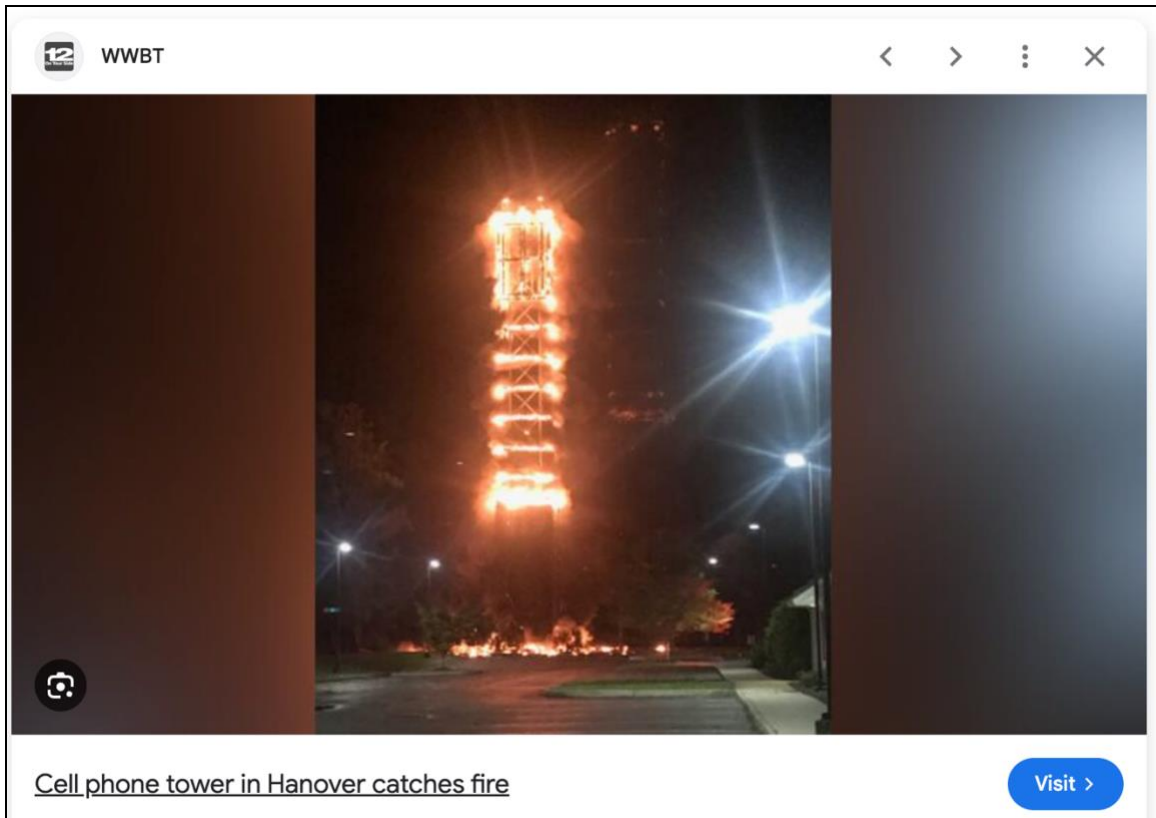
Chula Vista AT&T Tower Stadium Fire - March 2021

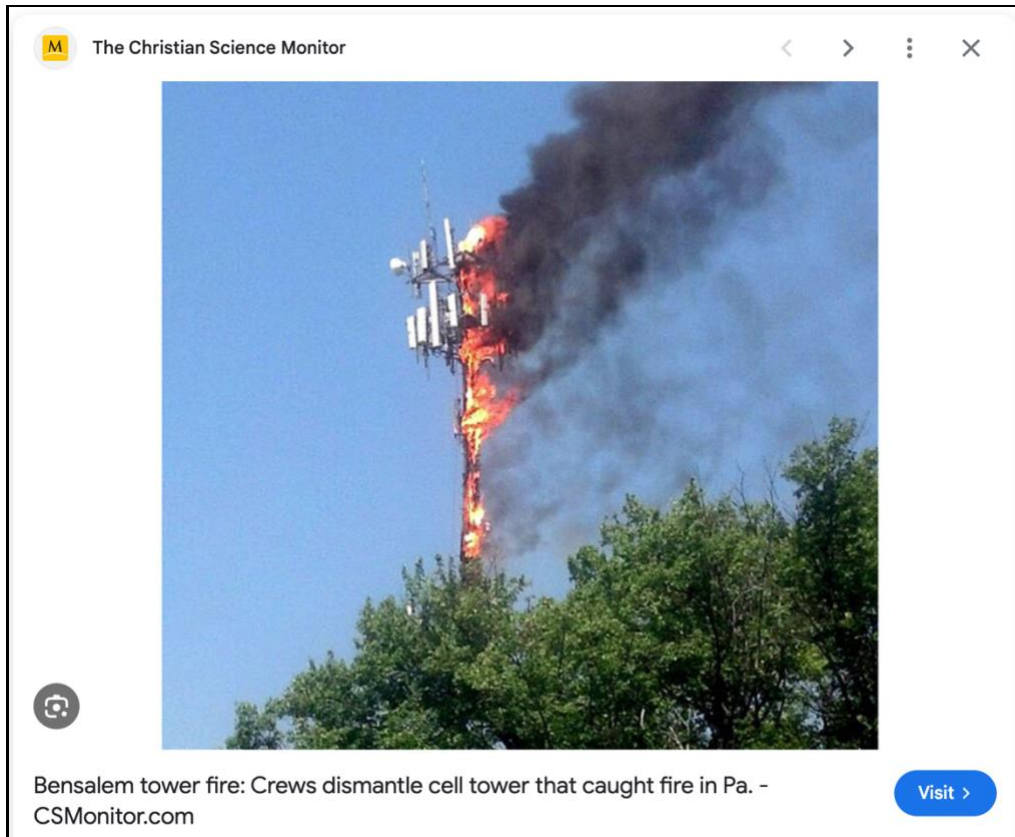




Other telecom cell tower related fires in the US - 2013, 2019, 2020, 2023







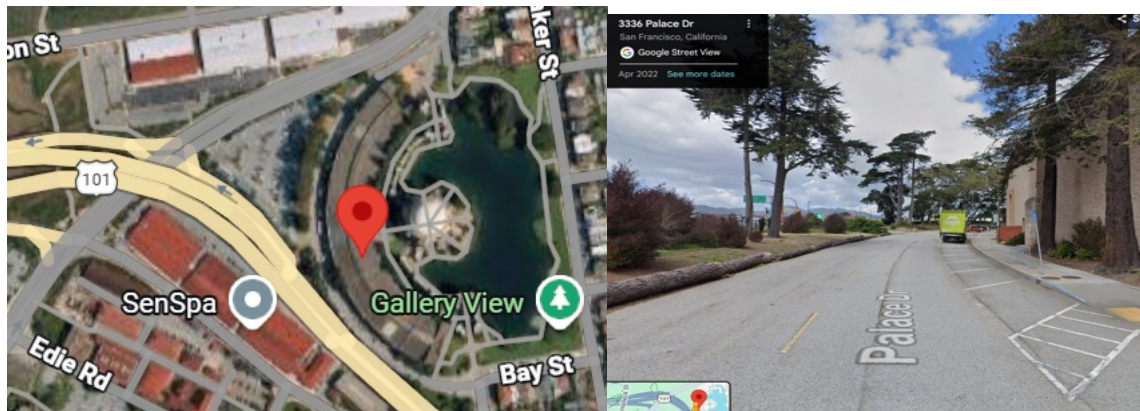
- **Appendices**
- **Appendix A: Planning & AT&T CEQA response: Misrepresentation of Cell Towers**
- **Appendix B: Studies on Impact on Property Values**
- **Appendix C: Appeal Realtor Letters on Decrease in Property Value**
- **Appendix D: Glen Canyon Park and Christopher Park natural resources**
- **biodiversity (4)**
- **Appendix E: Golden Gate Bird Alliance Letter to Oppose Cell tower near Glen Canyon Nov 26, 2025**
- **Appendix F: Landslide History Earthquake page 74 Geology of San Francisco 2018**
- **Appendix G: Land Instability map with gray infill and pink landslide areas**
- **Appendix H: Geotechnical Investigation for SFUSD 1999**
- **Appendix I: Jocelyn Cohen, Certified Arborist Statement**
- **Appendix J: Difficulty in Fighting Fires on Telecom Equipment: Susan Foster Letter 10-23-25**
- **Appendix K: John Avalos CEQA and CUA Appeal Letters**
- **Appendix L: Hammett and Edison Statement Shows Relatively Weak Signal Highlighted**

APPENDIX A

Planning and AT&T CEQA response– Misrepresentation of AT&T Tower Examples

Planning: p. 5&6 “The circumstances surrounding the project and the project site are not unusual nor are the project elements. Construction of a new Wireless Telecommunication Facility on a tall monopole a near parks, residences, and landslide zones, in the urban context of San Francisco is not a unique or unusual circumstance. There are numerous wireless telecommunication facilities within San Francisco, and many of them are adjacent to parks and residential areas.

3301 Lyon - recently (4/9/25) **approved** adjacent to the parking lot: **90-foot**, faux eucalyptus tree with 30KW generator and 190-gallon fuel tank approximately 75 feet west of Palace of Fine Arts.” *This is a park with minimal vegetation. The dark area is a **large lake**. It can hardly be compared to Glen Canyon. It is surrounded on three sides by Hwy101 and warehouses. There are residences on one side but they are much farther than 300 feet away.*

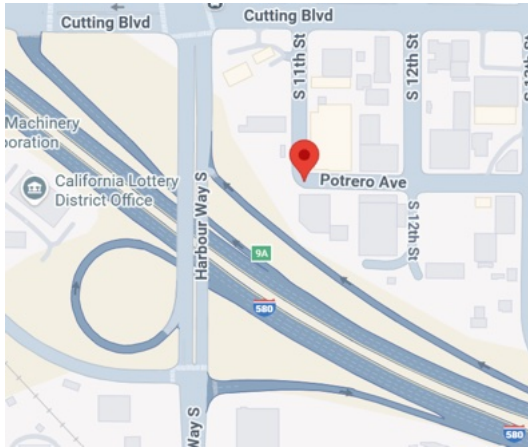


Opposition: *This is a park with minimal vegetation. The dark area is a **large lake**. It can hardly be compared to Glen Canyon. It is surrounded on three sides by Hwy101 and warehouses. There are residences on other side but they are much farther than 300 feet away.*

“throughout San Francisco, including at the **Balboa Bart Station 100-foot**,” *not near residences, baseball park on other side of the freeway.*



“and adjacent to San Francisco General Hospital at 777 Potrero Avenue near Highway 101 (aka Hospital Curve).”

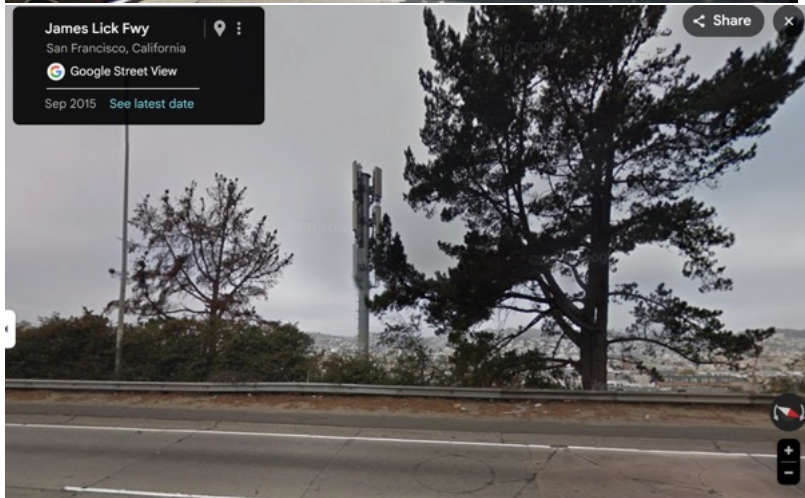
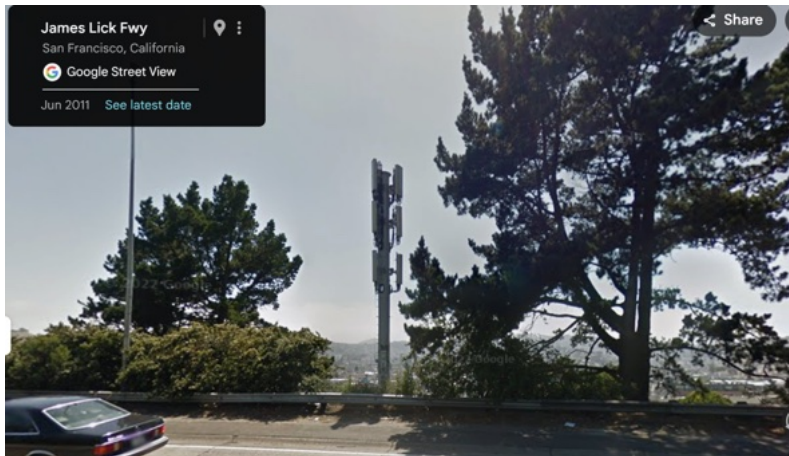


777 Potrero near SF General Hospital 80-feet

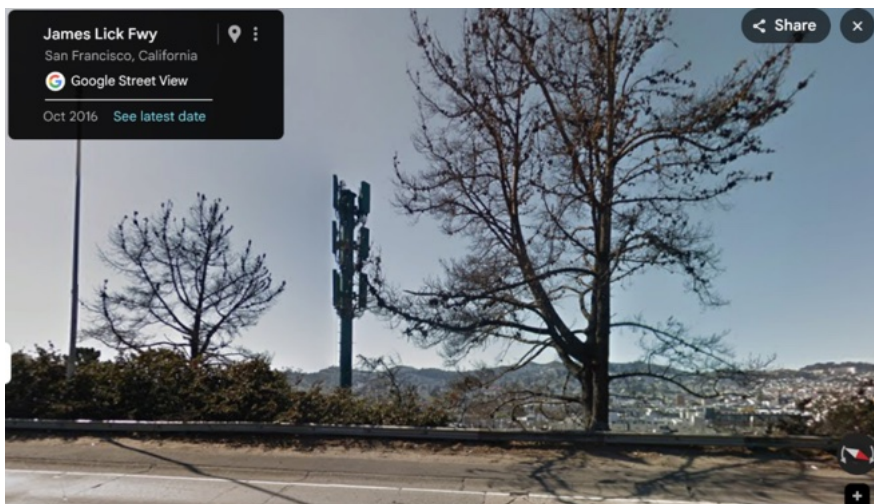
Photos below of same antenna from Freeway taken over 14 years show tree death/removal. Also shows how painting antennas blue does not blend them in with the sky. No park, no residences. Warehouses on opposite side of the street.



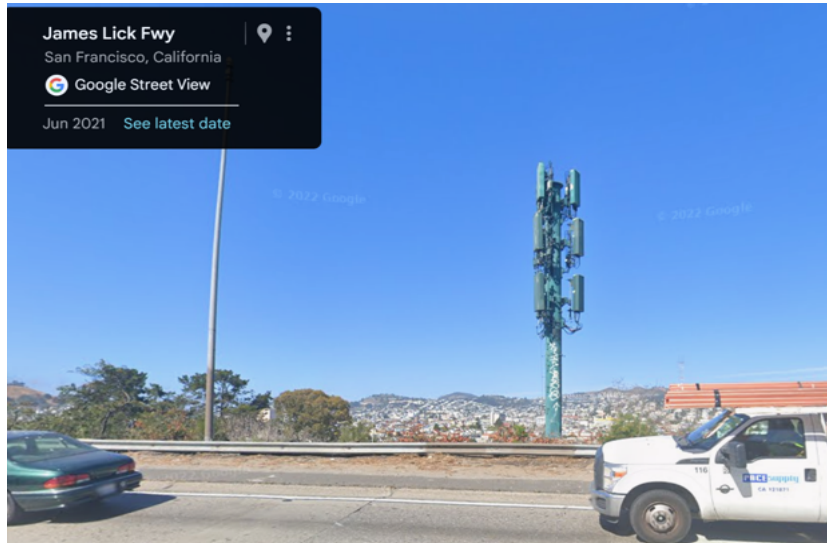
2011 photo from FWY opposite side of 777 Potrero



2015 trees thinning



2016 trees dead



2021 trees gone



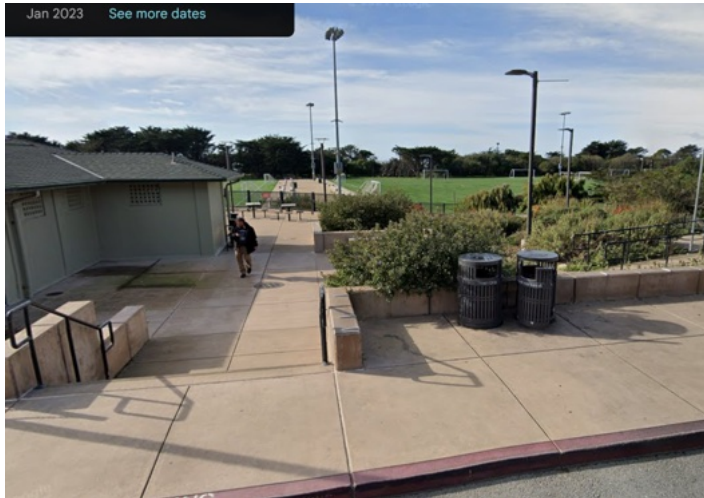
2025 trees gone, antenna painted blue doesn't camouflage it and lots of graffiti!

All of the above have more than one layer of antennas, AT&T refused to commit to only one layer at the 350 Amber location. Additional layers do not require a hearing, just pulling a permit.

AT&T Nov 26 Appeal of CEQA

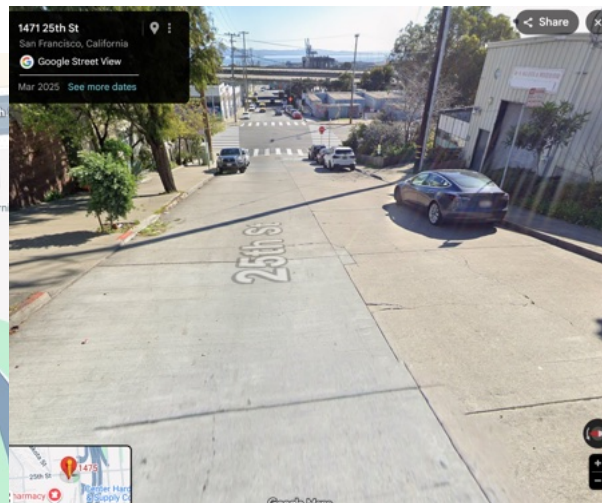
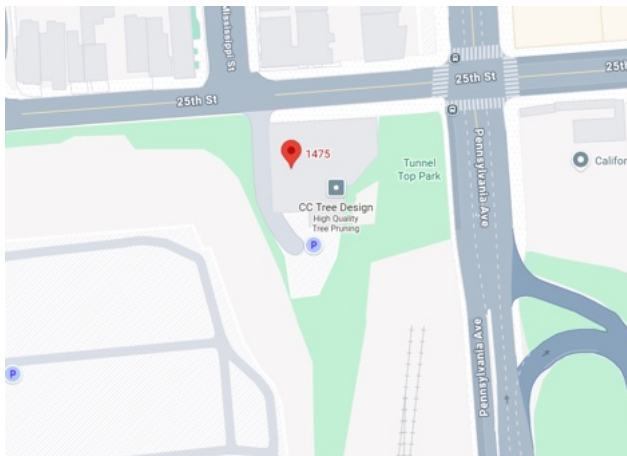
“the City has repeatedly determined that wireless telecommunications facilities appropriately fall within the Class 3 Exemption. In 2025 alone, the City approved the Exemption to the following wireless projects: see photos below

1400 John F. Kennedy Drive (approved 4/10/2025) – **60-foot** monopole with a 30KW generator and 190-gallon fuel tank adjacent to the athletic fields in Golden Gate Park.
: *no residences nearby, fields are artificial turf*



3301 Lyon – seen above cited by Planning Dept

1475 25th St approved **10/14/2025** 40-foot “adjacent to residents” *half the size of the 350 Amber pole, few homes but mostly industrial.*



Other known poles

80 foot monopole in Presidio along 101 north to the Golden Gate bridge - adjacent to buildings that border 101



93 foot monopole located by Portola neighborhood which can be seen above 101 and 280 ramps (San Bruno Ave & Alemany Blvd, 101 and 280)



130 foot monopole located in the parking lot of Sports Basement adjacent to 101



APPENDIX B

Impact on Property Values

Impact on Property Values - Cell Towers as “Hazards and Nuisances” for Realtors

The California Association of Realtors’ Property Sellers Questionnaire has a section where sellers must note “neighborhood noise, nuisance or other problems from.. ” and includes cell towers and high voltage transmission lines on the long list problems.

[Click here to see the California Association of Realtors’ Property Sellers Questionnaire \(p. 3-4 under 15. Neighborhood\)](#)

[The Cost of Convenience: Estimating the Impact of Communication Antennas on Residential Property Values by Locke, S. & Blomquist, G. Land Economics](#) (2016).

“We take advantage of a rich dataset of residential housing sales from central Kentucky that contains an extensive set of structural housing characteristics and precise location information. This allows us to overcome endogeneity issues caused by unobservable characteristics correlated with antenna location. The best estimate of the impact is that a property with a visible antenna located 1,000 feet away sells for 1.82% (\$3,342) less than a similar property located 4,500 feet away. The aggregate impact is \$10.0 million for properties located within 1,000 feet. (JEL Q51, R21)”

[The effect of distance to cell phone towers on house prices \(Florida case study\) by Bond, S. The Appraisal Journal](#) (2007).

“The research on the possible effect of cell towers on property values is extensive. In general, proximity to a cell tower appears to have a negative effect on property values. A study from the University of South Alabama analyzed over 23,000 home sales in Mobile County, Alabama relative to their proximity to cell towers. The researchers found that homes within 0.72 km of a cell tower decreased in value by an average of 2.65%. In addition, if the cell tower was visible from the property, then the properties decreased an average of 9.78%. A similar study in Kentucky found that properties within 1,000 feet of a cell tower sold for 1.82% less than a similar property located 4,500 feet away.”

The Department of Housing and Urban Development (HUD) Treats Towers as “Hazards and Nuisances”

The U.S. Department of Housing and Urban Development (HUD) Handbooks require appraisers to flag safety and marketability risks related to nearby towers or power lines. If a home lies within an easement or is too close to a cell tower or power line (both of which emit non-ionizing radiation), the appraiser must report it as a potential deficiency, comment on how it affects the property’s marketability, and determine whether encroachment rules apply.

The US Department of Housing and Urban Development (HUD) has long treated cell towers as “Hazards and Nuisances.”

“With regard to new FHA originations, the guide provides that “the appraiser must indicate whether the dwelling or related property improvements are located within the easement serving a high-voltage transmission line, radio/TV transmission tower, cell phone tower, microwave relay dish or tower, or satellite dish,” which is radio, TV cable, etc. “If the dwelling or related property improvement is located within such an easement, the DE Underwriter must obtain a letter from the owner or operator of the tower indicating that the dwelling and its related property improvements are not located within the tower’s engineered fall distance in order to waive this requirement.”

–[HUD HOC Archived Reference Guide: Hazards & Nuisances: Overhead High Voltage Transmission Towers and Lines](#)
[The HUD Handbook 4000.1](#) states:

“The Appraiser must notify the Mortgagee of the deficiency of MPR or MPS if the dwelling or related property improvements are located within an Easement or if they appear to be located within an unsafe distance of any power line or tower.

The Appraiser must note and comment on the effect on marketability resulting from the proximity to such site hazards and nuisances. The Appraiser must also determine if the guidelines for Encroachments apply.”

[-Report and Declaration by David E. Burgoyne, ASA, SR/WA Certified General Real Estate Appraiser](#) Submitted for the *Smart Communities and Special Districts Coalition* – representing over 31 million residents in 11 states and the District of Columbia.

“While the magnitude of the impact varies, the studies uniformly indicate that there is a significant impact on residential property values from installation of cell phone towers...”

Example, the Maryland Property Tax Assessment Appeal Board [formally ruled](#) to lower a home’s assessed value after finding that the presence and probability of a nearby cell tower negatively affected the property’s market value.

STATE OF MARYLAND
PROPERTY TAX ASSESSMENT APPEAL BOARD FOR MONTGOMERY COUNTY
Tel. No. 301-279-8333 51 MONROE PL # 301, Rockville, MD 20850 FAX # 301-279-1910

TO: [REDACTED]
SILVER SPRING MD 20903 - 1330

COPY TO:
DEPT OF ASSESSMENT
AND TAXATION
30 W. GUDE DR # 400
ROCKVILLE MD 20850

COPY TO:
DEPT OF FINANCE
MONTGOMERY CO GOV
266 Rockville Pike # LL15
ROCKVILLE MD 20850

PTAAB APPEAL Number: [REDACTED] (Tax Year 2010)
Date of Hearing: MARCH 2011
Property ACCOUNT Number: [REDACTED]
Property under appeal: [REDACTED]

ORDER Date: APRIL 2011

This is to certify that the Property Tax Assessment Appeal Board considered the above numbered case and has ruled that the determination by the Department of Assessments and Taxation be reversed.

Comparables warrant a reduction in value. Probability of neighboring cell tower also affects value negatively.

Adjusted New Market Value
Land:
Improvements:
Total

PS Shyamunder
Shyamunder Viswanatha (or "SAM")
CLERK TO THE BOARD

IMPORTANT NOTICE
If disagreeing with above decision of the Board, you have the right to appeal (within 30 (thirty) days from date of this Order) to the Maryland Tax Court, under the provisions of the Tax-Property Article, Section 14-512 of the Annotated Code of Maryland.
To appeal, make a copy of this Order, attach with an appeal letter addressed to Maryland Tax Court, 301 West Preston Street-Suite 513, Baltimore, MD 21201 and send to the Court.

The Board reversed the Department of Assessments and Taxation’s original valuation, concluding that comparable sales supported a reduction due in part to the impact of a neighboring cell tower. This order demonstrates that a Maryland government authority recognized cell towers as a real, market-based factor that can reduce property value, not a speculative concern.

There has been significant research regarding the question of the impact on residential property values from construction of cell phone towers in neighborhoods. The results of these studies vary but they commonly indicate that there is a significant impact. While the magnitude of the impact varies, the studies uniformly indicate that there is a significant impact on residential property values from installation of cell phone towers. Not surprisingly, the studies that show little or no impact are universally commissioned by and paid for by the telecommunications industry.

APPENDIX C

Charles W. Mader
135 Red Rock Way #L308
Diamond Heights Village
San Francisco, Calif., 94131

June 20, 2025

RE: Proposed unneeded 104' Monopole Cell Tower at 35 Amber Way

Good Afternoon,

My name is Charles Mader. I have been a licensed California real estate agent since 2002 and a real estate broker since 2006. I am the top-selling broker in the Diamond Heights neighborhood, with over 150 closed sales over the past 23 years. In addition, I manage 22 local homes on behalf of investor clients.

No one sells or leases more homes in Diamond Heights than I do.

In my professional opinion, the installation of the proposed 104-foot AT&T monopole tower would negatively impact the desirability of homes in our community. While it's difficult to assign an exact dollar amount, buyers and renters—when given a choice—will almost always opt for a home without a view obstructed by a large, unsightly, and unnecessary structure. In fact, many residents still use landlines, which have become increasingly affordable, particularly when bundled with cable services.

While I am not a medical expert and cannot speak to the potential health risks of such a tower, I am deeply concerned about the fire hazard it presents. I personally witnessed non-native eucalyptus trees ignite during recent wildfires in Southern California. Placing a tower within a grove of these trees—at the rear of the Police Academy parcel—would be irresponsible. Proponents claim the grove will "camouflage" the tower, but this rationale is questionable. The City is actively removing eucalyptus trees, including at Laguna Honda near the Forest Hill Muni Metro station, due to their fire risk and ecological impact.

Diamond Heights—and especially Glen Canyon, where the tower would be located—is a unique, tranquil enclave in the heart of San Francisco. It's a rare, largely unspoiled ridge-top community surrounding a deep canyon. The addition of this tower would degrade the area's natural aesthetics and increase noise pollution in nearby parks and playgrounds.

I urge you to reject this proposal.

Thank you for your time and consideration.

Sincerely,

Charles W. Mader

Charles Mader
California Licensed Real Estate Broker #01351780

From: [Deborah Lopez](#)
To: [Dennis Phillips, Sarah \(CPC\)](#)
Cc: [CPC-Commissions Secretary](#); [Dacey, John \(CPC\)](#); [Commission, Recpark \(REC\)](#)
Subject: Comment on ATT MACRO TOWER 350 Amber
Date: Tuesday, July 15, 2025 2:47:50 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commission
Planning Department
49 South Van Ness
SF CA 94103 Comment on ATT MACRO TOWER 350 Amber

SF Planning Commissioners
Chair Lydia So,
Vice Chair Kathrin Moore
Commissioners: Derek Braun, Gilbert Williams, Amy Campbell, Theresa Imperial and Sean McGary
c/o Commission Director Sarah Dennis-Phillips sarah.dennis-phillips@sfgov.org
cc: commissions.secretary@sfgov.org
cc: recpark.commission@sfgov.org
cc: john.dacey@sfgov.org

Commissioners,

I write as a Real Estate professional in San Francisco and the Bay Area for nearly 50 years. When I retired in 2024, I was one of the top producing San Francisco Real Estate agents with Compass. In addition I have a legal background. Based on my decades of experience in marketing homes, condos and apartment buildings, I know that the intended tower will have a negative impact on values in the area around the target address.

Based on my firsthand experience, I know that prospective buyers are looking for location and aesthetics. I have sold homes in the vicinity of 350 Amber. The presence of a Wireless Telecommunications Facility like the one proposed in the Diamond Heights neighborhood (a MACRO TOWER with 12 ten foot antennas and nine 3 foot radio antennas perched on a 104 feet high (10 story equivalent) monopole with a 190 gallon diesel fuel tank at its base and additional electrical equipment and cabinetry) will definitely be a deterrent for property sales in the immediate area and the surrounding neighborhood. In addition, it will absolutely impact the enjoyment of the owners who live in Glen Park, Diamond Heights, Upper Noe Valley and beyond.

The Diamond Heights neighborhood has long been a desirable one for families because of the nearby Christopher Park playground & Glen Park Canyon & Park, two preschools, a tennis court, community garden and proximity to the Diamond Heights shopping center. Many residents have "aged in place" for decades and walk the paved playground border with their dogs. It's also a favorite for nature lovers because it is adjacent to Glen Canyon with its rocky paths for hiking and climbing (now part of the Cross-Town trail attracting visitors from across the City and beyond). The

views from the nearby streets, from the homes and condos (designed to match the contours of Red Rock Hill overlooking the park and canyon) with their lush trees and open sky make this a unique and desirable location in San Francisco. The parks serve the diverse neighbors who reside in condos, homes (some which are historic "Modernist architectural Eichlers") apartments, and low-income public housing, all of whom seek out the natural beauty and green tree lines and vast skyline.

This MACRO TOWER looming over the playground (literally 20 feet away) and at the edge of the Canyon will negatively impact the views and the natural beauty of the neighborhood. Property values will be compressed - they will not enjoy the same increase in value as other neighborhoods will & as they normally have for decades and possibly will see a decline. It's been reported that 94 percent of homebuyers and renters said a nearby cell tower or group of antennas would negatively impact interest in a property or the price they would be willing to pay for it. Indeed, the impact of a large MACRO TOWER will have an adverse impact on aesthetics and a notable impact on the value and marketability of residents in Diamond Heights.

You should note that The California Association of Realtors' Property Sellers Questionnaire specifically lists "cell towers" and ("high voltage transmissions lines") on the disclosure form for the sellers of real estate. Potential homebuyers will reject this giant MACRO multiple antenna TOWER and if they are attracted to the park and playground, they will have reservations because it will be 1) a visual obstruction of the beautiful park, 2) ruin the peace and tranquility of being in nature, and 3) because of safety concerns given the high winds & earthquakes that could knock over such a tall tower. Even without falling, the TOWER is directly among five old-growth eucalyptus trees. In high winds, branches from these trees break off and could lead to fire with a 190-gallon fuel tank at the foot of the tower. These kinds of safety issues will also drive-up property insurance premiums which have increased in recent years with the fires in California.

Homes where cell towers are visible or within 2500 feet – visible or not, are valued lower by as much as 10%. Many of the homes and apartments in Diamond Heights are within 2,500 feet of the proposed MACRO Tower and whether visible or not these properties will likely be valued lower. The reluctance of potential buyers to invest in homes near cell tower facilities (especially MACRO TOWERS) is understandable and to be expected given concerns about aesthetic depreciation, financial loss and potential disruption to the surrounding environment and the likelihood of adding antennas to the tower which will not even require public input or Planning Commission approval.

In my opinion, the proposed ATT 104 foot MACRO Tower adjacent to the playground at the edge of the Canyon and visible from all sides of the park(s) will result in the homes in the vicinity of the TOWER losing value and being harder to resell. This is greatly unfair to an area that has already suffered from the impact of Sutro Tower many years ago.

Thank you for considering this important perspective. I know you will weigh factors carefully and make decisions that align with the careful planning and harmony of the neighborhood.

Sincerely,

Deborah Lopez

corcoran

ICON PROPERTIES

San Francisco Planning Commission
49 South Van Ness Avenue, Suite #1400
San Francisco, CA 94103

July 7, 2025

Dear Planning Commission Members:

I am a licensed Realtor w/ Corcoran Icon Properties here in San Francisco. I have been licensed and working in the San Francisco residential real estate market since 2003, almost 23 years. During that time, I have represented many buyers and sellers on real estate transactions in a variety of properties in the Diamond Heights neighborhood in San Francisco.

I've been asked to weigh in on the proposed installation of the 104-foot monopole/cell tower. Although there is no way to precisely quantify how much the installation of such a tower will affect property values in the neighborhood, a decrease of 10-12% would not be unheard of.

Among San Francisco's widely differing neighborhoods, Diamond Heights is certainly unique. It's definitely not for everyone. And those that choose to live there often have to endure hardships that other neighborhoods seem to escape: extreme weather, lack of retail amenities and, at times, highly trafficked streets.

In my experience, prospective buyers are concerned about the proximity of their homes to cellular transmission equipment and would choose to purchase homes that are not located near transmission facilities. It's my professional opinion that the installation of such a tower would unduly affect the property values in the neighborhood – a neighborhood which is already suffering from high interest rates (particularly for condominiums). The tower installation is likely to make things worse therefore I recommend not to install such a tower in Diamond Heights.

Very Truly Yours,



Seth Skolnick
Corcoran Icon Properties
DRE Lic. #01352409



THE HESS TEAM

891 Beach St, San Francisco, CA 94109 | (415) 805-2360 | HessTeamHomes.com | Tabre@HessTeamHomes.com

July 6, 2025

San Francisco Planning Department
Attn: Planning Commission Members
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Planning Commission Members,

As a San Francisco resident and real estate professional who works daily with homebuyers and sellers across the city, I want to respectfully share my professional perspective regarding the proposed 104-foot monopole at 350 Amber Drive.

In my experience, few factors impact a home's desirability and perceived value more immediately than proximity to large utility structures – especially one of this height and scale. For the vast majority of buyers I represent, the presence of a monopole introduces three immediate concerns: visual blight, health uncertainty, and loss of privacy. Regardless of its intended purpose, this type of structure sends a message that is hard for most buyers to overlook.

There's no doubt in my mind that the installation of a tower of this magnitude in a residential hillside neighborhood like Diamond Heights will negatively affect both livability and property values. Based on my work with buyers and sellers, I estimate a potential 8–15% reduction in value for homes within proximity of the proposed site. And it's not just about sale price: homes near such structures can sit longer on market, attract fewer offers, and ultimately see diminished returns for local homeowners.

Beyond individual transactions, I'm concerned about the broader precedent this would set. Placing a 104-foot monopole in a residential view corridor could signal a shift away from the thoughtful planning and environmental sensitivity that make Diamond Heights so uniquely livable.

I urge the Commission to pause, reevaluate, and consider alternatives that meet the city's infrastructure needs without sacrificing the visual harmony, market vitality, and community integrity of Diamond Heights.

Thank you for your time and consideration.

Tabre Hess
Realtor® | Compass
Hess Team Homes | HessTeamHomes.com
DRE# 2001886

SF City Properties

July 1st, 2025

To whom it may concern:

I am a licensed real estate broker in the State of California for the past few years and have worked in the real estate industry for 9 years. My professional focus includes Noe Valley, Mission/Dolores, Sonoma, Potrero Hill, and Twin Peaks area. I am well-acquainted with the market, including the concerns and priorities of local home buyers.

Based on my experience, many prospective buyers express hesitation about purchasing homes or rentals that are located near cellular transmission equipment. These concerns often lead to two primary challenges for homeowners looking to sell properties near such infrastructure: (1) it typically takes longer to find a buyer for homes located near cellular transmission equipment and (2) these homes often sell for significantly less – commonly 10% to 15% lower – compared to similar homes that are not near such equipment.

Even when homes are priced below comparable properties, they tend to remain on the market longer due to reduced interest. These challenges are even more pronounced in affluent neighborhoods, where buyers tend to be particularly cautious. In my professional opinion, the installation of a cellular transmission node in close proximity to a home will likely have a substantial negative impact on market value and marketability. It is reasonable to expect that the home will take longer to sell and will do so at a reduced price.

Sincerely,

Mariana Murphy
Property Manager


mpmurphy@sfcityprops.com

415-648-1200

SF City Properties

mpmurphy@sfcityprops.com
www.sfcityprops.com

Ph: 415-648-1200
Fax: 415-821-7800

Subject: Formal Objection to Proposed Cell Tower Near 350 Amber Drive

To Whom It May Concern,

I am writing to express my strong opposition to the proposed cellular tower installation near 350 Amber Drive. I have been a licensed real estate agent in San Francisco for the past six years (DRE: 02086525) and a homeowner at 5092 Diamond Heights Blvd for the last 24 years—less than half a mile from the proposed site.

Economic Impacts on Property Values and Real Estate Market

As a real estate professional with deep experience in this neighborhood, I can attest that proximity to large-scale cellular infrastructure has a clear and negative effect on property values. Prospective homebuyers consistently express concern about living near such facilities. In my experience, this results in two key outcomes:

1. Homes near large cell towers take significantly longer to sell.
2. Sale prices are materially lower for homes in areas near similar equipment have seen price drops of up to 20%.

This is especially concerning for the condominium market in Diamond Heights, where property values are already sensitive to surrounding environmental and visual factors. The presence of a large tower would discourage potential buyers and extend time on market, exacerbating the impact on homeowners and the local housing market.

Visual Blight and Neighborhood Character

The proposed tower, even if partially concealed with paint or landscaping, would fundamentally alter the visual landscape of Diamond Heights. Given its potential placement on elevated terrain, it is likely to permanently disrupt views and skyline aesthetics. This is more than just an eyesore—it is a form of neighborhood disfigurement that diminishes the quality of life for long-time residents and new buyers alike.

Additionally, large-scale towers raise serious concerns about long-term public health and environmental safety, especially if anything were to go wrong with the installation or operation of the facility.

Concerns About Underground Infrastructure

Separate from the tower itself, I am also deeply concerned about the proposed underground power lines and fiber trench, which would be laid across from homes on Amber Drive. This project introduces a variety of potential risks to both private property and the surrounding environment, including:

- **Property Damage:** Improper excavation or installation techniques could damage nearby homes or infrastructure.
- **Safety Hazards:** Poorly installed or exposed cables pose risks of injury or fire.
- **Service Interruptions:** Frequent utility issues can reduce neighborhood desirability and impact property values.

Environmental and Ecological Impact

Beyond property concerns, the environmental risks are significant:

- **Soil Erosion and Runoff:** Excavation could lead to destabilization and increased runoff, threatening local landscapes and water quality.
- **Water Contamination:** Damaged cables or improper waste handling could pollute water sources.
- **Wildlife and Habitat Disruption:** Trenching and vegetation removal can destroy habitats and endanger local species.
- **Noise Pollution:** Installation and repair would involve heavy machinery, disturbing both residents and wildlife.
- **Sinkhole Risk:** Underground disruption may alter water flow and soil stability, increasing the risk of sinkholes.
- **Wildlife Hazards:** Discarded materials or damaged cables can entangle or injure animals in the area.

Sincerely,
David Lasker
Licensed Realtor, DRE: 02086525
5092 Diamond Heights Blvd
San Francisco, CA 94131

- **Property Damage:** Improper excavation or installation techniques could damage nearby homes or infrastructure.
- **Safety Hazards:** Poorly installed or exposed cables pose risks of injury or fire.
- **Service Interruptions:** Frequent utility issues can reduce neighborhood desirability and impact property values.

Environmental and Ecological Impact

Beyond property concerns, the environmental risks are significant:

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- **Sinkhole Risk:** Underground disruption may alter water flow and soil stability, increasing the risk of sinkholes.
- **Wildlife Hazards:** Discarded materials or damaged cables can entangle or injure animals in the area.

Sincerely,
David Lasker
Licensed Realtor, DRE: 02086525
5092 Diamond Heights Blvd
San Francisco, CA 94131

APPENDIX D

Glen Canyon Park on of San Francisco's "significant natural resource" areas.

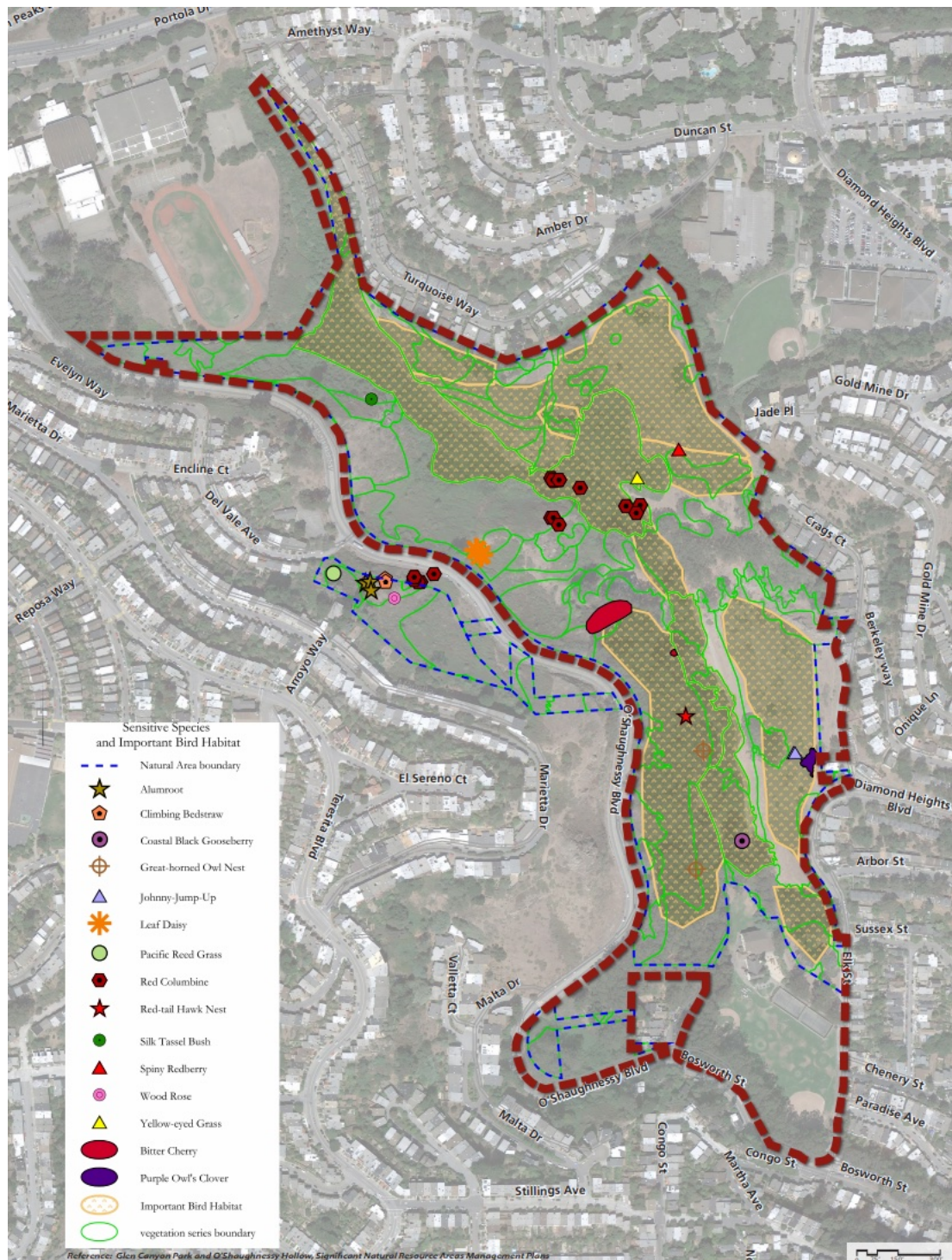
- Original territory of the Muwekma Ohlone Tribe, Glen Canyon Park, a 70-acre natural oasis, serves as a vital green space in the heart of San Francisco. Glen Canyon Park is situated in a deep canyon, with Islais Creek flowing through its heart. The park is surrounded by the Diamond Heights and Miraloma Park neighborhoods, creating a unique urban wilderness experience.
- Glen Canyon Park is part of the Cross Town Trail and has become a beloved destination for residents and visitors alike.
- The park's **"significant natural resource areas" play a crucial role in maintaining local biodiversity**. Conservation efforts are in place to protect native San Francisco species and their habitats within the park and community improvement workshops have been instrumental in preserving the natural scenery.
- The park plays a crucial role in prioritizing environmental stewardship among neighborhood and San Francisco residents who are actively involved in initiatives aimed at preserving its natural resources and educating children and the public about local ecology.
- Glen Canyon Park is home to several native San Francisco species, including the endangered San Francisco garter snake and the Mission blue butterfly. Wildlife observation is a popular activity within the park, as it allows visitors to gain a deeper understanding of the urban ecosystem. Conservation efforts are in place to protect these species and their habitats and to encourage them to participate in conservation efforts.
- Glen Canyon Park is home to several native San Francisco species, **such as the endangered San Francisco garter snake and the Mission blue butterfly**.
- The area of the proposed antenna is amid a **"mixed exotic oak forest" with nearby "blue gum" eucalyptus trees** and beyond the hill adjacent to the Police Academy and the George Christopher playground is **covered by wild oat grass land and many native grasses according to the California Native Plant Society**. The area is mapped on the Rec & Park [website](#) as: an **important bird habitat for nesting, breeding and roosting among the trees for birds of prey as well as bats and in the native pacific reed grass**.
- The importance of tree root systems cannot be underscored enough. The required digging to set the pole and the foundation will significantly disrupt the roots of the "mixed exotic oak forest" and "blue gum forest" the pole is being placed in and likely kill them. When tree roots are damaged in a forest, it can significantly affect nearby trees through several interconnected pathways:

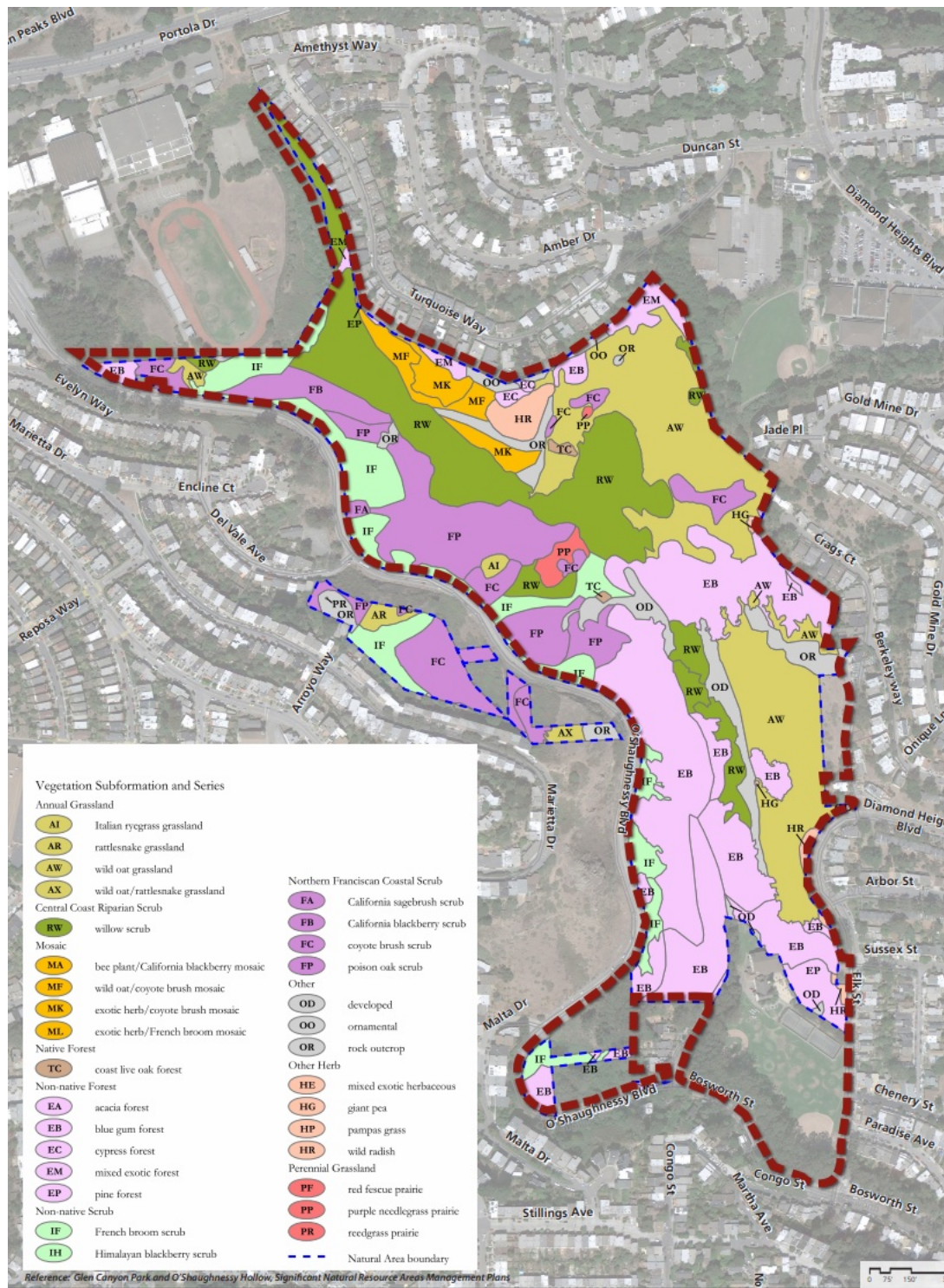
Mycorrhizal Network Disruption of Trees are connected underground through mycorrhizal fungi (often called the "wood wide web"). These fungal networks link root systems and allow trees to share water, nutrients, and even chemical signals. When roots are damaged, these connections can be severed, reducing the injured tree's ability to receive support from neighbors and cutting off its ability to share resources with others.

If the damaged tree dies, it creates a gap that destabilizes the local environment - more sunlight reaches the forest floor, humidity drops, and wind exposure increases, which can stress surrounding trees that were adapted to shadier, more protected conditions.
- Increased Vulnerability to Threats Root damage makes trees more susceptible to pathogens, pests, and windthrow (being blown over). These problems can spread to neighboring trees. For

example, root rot fungi can move from weakened trees to healthy ones through root contact, and bark beetles often colonize stressed trees before spreading to nearby healthy ones. Damaged root systems can reduce soil stability, potentially affecting the anchoring of nearby trees and increasing erosion risk that impacts the whole stand. In addition millions of **micro habitat from invertebrates and other irreplaceable soil biota** have coevolved with the trees over for over 150 years and rely on this stability for survival.

- The park provides a unique opportunity for wildlife observation, allowing visitors to learn about the urban ecosystem and the importance of conservation efforts. **Coyotes, birds, owls, hawks all rely on the forest.**
- As part of a broad strategy to maintain the park's ecological integrity, recent initiatives have been aimed at restoring native habitats within the park, including the removal of non-native trees and planting of native species to enhance biodiversity and create a fire break.
- The park offers a network of hiking trails, providing opportunities for both casual walkers and serious hikers to explore the park's natural wonders. The park's urban hiking trails are particularly popular, as they allow visitors to experience the beauty of nature within the city limits. One of the trails begins at Amber and Turquoise and travels just below the steep hill behind the Police Academy with Oak Trees above and grassy canyon below.
- George Christopher Park and Playground and Glen Canyon Park serve as a focal point and foster a deep sense of community. The Playground is used daily for softball and soccer, and for adults and families walking around the perimeter of the ballpark (the proposed Wireless Telecom Facility antenna structure is less than 20 feet from "center field") and the children's play area is used by the nursery school and children of all ages every day.







APPENDIX E

November 26, 2025

San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors
bos.legislation@sfgov.org

Re: SUPPORT-File No. 251094 – Appeal: CEQA Class 3 Exemption at 350 Amber Dr Project

Dear San Francisco Board of Supervisors,

We are writing to express our concerns for the electrical antennae tower at the 350 Amber Drive Project and its impacts on birds in Glen Canyon Park. Glen Canyon Park is a San Francisco designated Significant Natural Resource Area and the park has over 130 species of birds that rely on it for breeding grounds or critical overwintering habitat. The proposed tower has potential impacts such as bird and bat collision risk and increased artificial light at night.

Golden Gate Bird Alliance (formerly Golden Gate Audubon) is a non-profit organization whose mission is to inspire people to protect San Francisco and the Bay Area's birds, and our shared natural environment. For over 100 years we have been a leader in bird conservation and habitat protection. We envision a world where birds, wildlife, and all people flourish together.

Glen Canyon Park is particularly important for birds who utilize riparian habitat, as the Islais Creek flows through the park and supports willows and other species, as well as grassland habitat in the hills and rocky high elevation areas. These ecosystem types are rare in San Francisco due to human development and the patches in Glen Canyon are important as havens for the bird species that rely on these habitats.

Bird species identified by National Audubon as most susceptible to declines due to climate change such as Allen's Hummingbird and Dark-eyed Junco breed in the park. Additionally many raptors such as Great-horned Owls, Red-tailed Hawks, Red-shouldered Hawks, and Cooper's Hawks have bred in the park consistently over the years.

Additionally, San Francisco is on the Pacific Flyway, an ancient migratory path used by hundreds of migratory birds. Most birds migrate at night and bright artificial lights at night cause increased collisions with buildings and towers, cause them to veer off course, and stopover more frequently, putting them at risk of harm from other anthropogenic direct threats. The lights required for the tower would add to this artificial light pollution.

Thank you for your consideration,

Glenn Phillips
Executive Director

GOLDEN GATE BIRD ALLIANCE

2150 Allston Way, Suite 210 Berkeley, California 94704

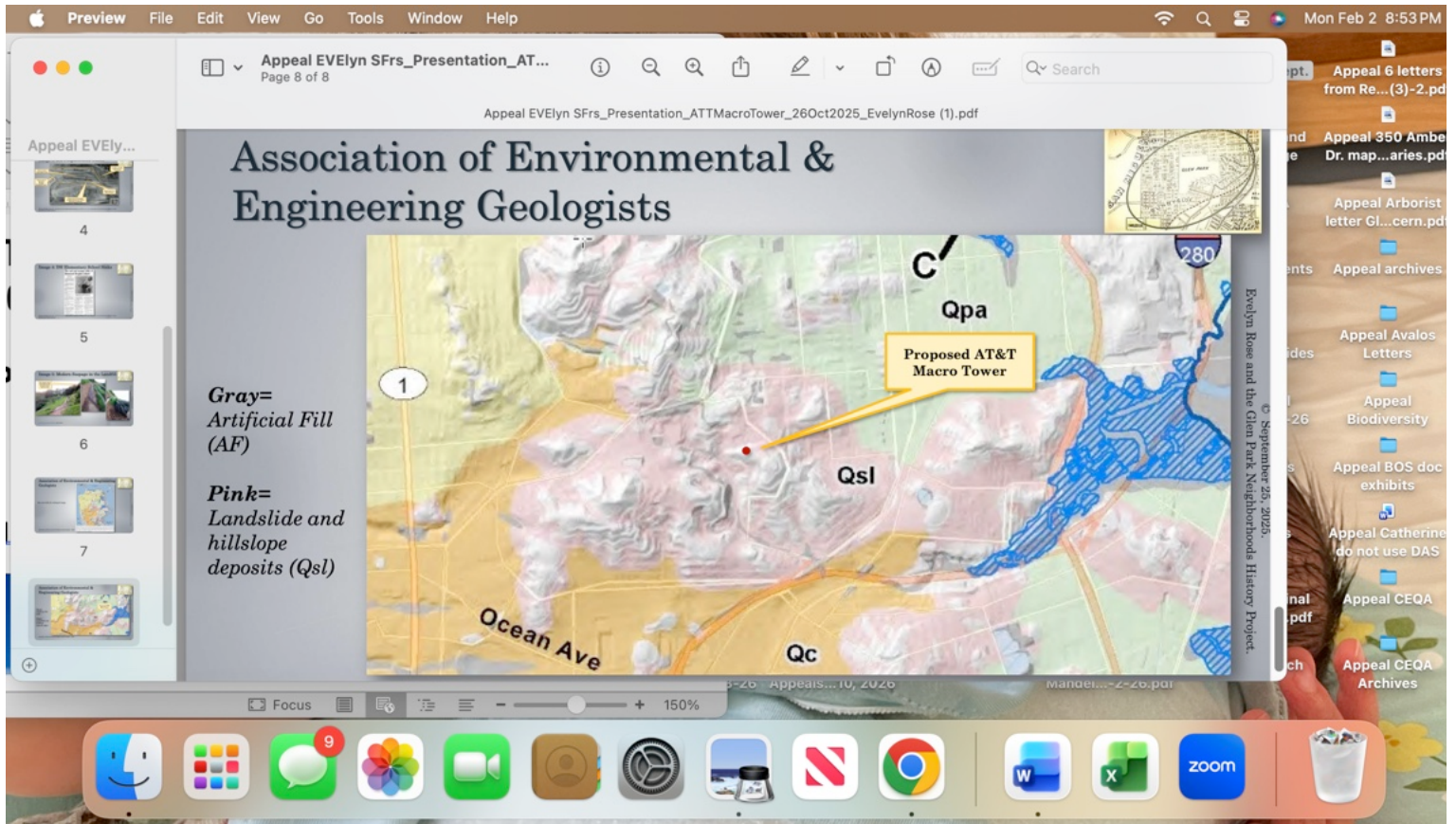
phone 510.843.2222 fax 510.361.0140 web www.goldengatebirdalliance.org

APPENDIX F

Geology of San Francisco, CA by Environmental Engineering Geologists (AEG) presented 2018 Except page 74 in paragraph entitled *Landslide and Hillslope deposits*

Landslide and hillslope materials within the San Francisco area include a combination of colluvium and earthflow, debris flow, debris slide, and rotational slump deposits (Figure 39). Multiple maps prepared by the U.S. Geological Survey and California Geological Survey (Schlocker, 1974; Nilsen et al, 1979; Pike, 1997; Wentworth, 1997; Hillhouse and Godt, 1999; Wilson et al., 2000) have identified historical slope failures within the city concentrated near Mount Sutro, Twin Peaks, Mount Davidson, Diamond Heights, Potrero Hill and the Sea Cliff area (Figure 39). These deposits are found in several key areas: (1) steep slopes veneered with colluvium overlying Franciscan Complex bedrock, (2) coastal bluffs where high cliffs expose sheared Franciscan bedrock prone to debris slides and rock falls, and (3) steep slopes and sea cliffs in the southwestern part of San Francisco where the Merced Formation is prone to rotational and translational sliding.

APPENDIX G



DRAFT

January 18, 1999

Our Job No. 1393-029

DRAFT

San Francisco Unified School District
Facilities Planning and Construction
1511 Newcomb Avenue
San Francisco, California 94124

Attention: Ms. Elizabeth Lee

Ladies and Gentlemen:

Report
Geotechnical Investigation
Proposed Remodeling and Seismic Upgrade
San Francisco Police Academy
350 Amber Drive
San Francisco, California

This report presents the results of our geotechnical investigation for the proposed remodeling and seismic upgrade of the San Francisco Police Academy located at 350 Amber Drive in San Francisco, California. The subject campus previously housed the Diamond Heights Elementary School.

The campus was built upon a bench on the north side of a filled ravine. The fill material was excavated from nearby hills.

Our report¹ dated May 26, 1998 presents the results of the literature research of the development of the Diamond Heights Elementary School. The initial geotechnical report² for the site was prepared by Woodward-Clyde-Sherard and Associates dated January 29, 1965. Woodward-Clyde & Associates prepared a second report³ dated March 21, 1969 addressing the distressed conditions of the walls and floor slab of the Diamond Heights Elementary School building.

¹"Geotechnical Engineering Services, Proposed Remodeling and Seismic Upgrade, San Francisco Police Academy, 350 Amber Drive, San Francisco, California," dated May 26, 1998 (Our Job No. 1393-029).

²"Soil Investigation For the Proposed Diamond Heights Elementary School, Project 905, Amber Drive and Duncan Street, San Francisco, California," prepared by Woodward-Clyde-Sherard and Associates, Consulting Soil & Foundation Engineers, dated January 29, 1965.

³"Diamond Heights Elementary School, Amber Drive and Duncan Street, San Francisco, California," prepared by Woodward-Clyde & Associates, Consulting Soil Engineers and Geologists, dated March 21, 1969.

DRAFT

January 18, 1999

Recently, additional geotechnical investigation reports for the site were obtained from a San Francisco Unified School District warehouse. Woodward-Clyde Consultants prepared a third report⁴ dated June 7, 1976 addressing settlement in the south wing of Diamond Heights Elementary School. Harding-Lawson Associates prepared a report⁵ dated July 15, 1977 addressing the movements at Diamond Heights Elementary School.

PROPOSED CONSTRUCTION

Present plans call for the remodeling and seismic upgrade of the existing buildings at the Academy. This is in preparation for possibly converting the Academy back to an elementary school or maintaining the campus as an administration facility. We understand that shear walls, among others, will be required as part of the retrofit. Details of the loading information are not available at this time. It is also possible that the existing building will be demolished and replaced with appropriate school buildings.

PURPOSE AND SCOPE OF SERVICES

The purpose of our investigation was to explore the subsurface soil conditions in the project area, provide recommendations for foundation support of the proposed shear walls, and provide documentation for the preparation of the Geo-Hazard Statement as required by the Office of Regulation Services of the Division of the State Architect for the subject campus. The investigation was performed substantially in accordance with our proposal dated July 15, 1998.

The scope of our services included a field exploration program of drilling three borings, along with laboratory testing and engineering analyses.

SUMMARY OF SUPPLEMENTARY LITERATURE REVIEW

The Woodward-Clyde Consultants report dated June 7, 1976, indicates that structural repairs were performed on the northerly part of the school building in 1970, and no further distress was observed. San Francisco Unified School District records indicate the masonry wall on the east side of the main entrance was repaired in February of 1970. Distress and deformation of the southerly two-story wing of the building was observed in 1974, and surveys of settlement markers were taken.

Horizontal deformation of the fill of 1 inch in 4 months was recorded below Christopher Park, which is about 25 feet below the school playground level. 8 inches of vertical deformation was recorded at the south end of the building. It was estimated that the settlement would occur at a rate of 1-1/2 inches per year based on the settlement measurements. The average degree of saturation of the fill had increased from 63% in 1964 to 94% in 1975.

⁴"Diamond Heights Elementary School, Amber Drive and Duncan Street, San Francisco, California," prepared by Woodward-Clyde Consultants, Consulting Engineers, Geologists, and Environmental Scientists, dated June 7, 1976.

⁵"Geotechnical Investigation Relative to Movements of the Diamond Heights Elementary School," prepared by Harding-Lawson Associates, Engineers, Geologists, and Geophysicists, dated July 15, 1977.

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It was concluded by Woodward-Clyde Consultants that the entire mass of fill placed to develop Christopher Park and the school property was moving along the original ravine slopes. It was recommended to temporarily discontinue occupancy of the building and continue monitoring the movements and deformation, or continue to occupy the building during monitoring.

Harding Lawson Associates performed an independent geotechnical investigation of the movements of the school building with the results presented in a report dated July 15, 1977.

Harding-Lawson Associates developed seven theories of possible causes for the movement. It was also noted that there was a lapse of 6 years between the period of settlement in 1967, which occurred in the northern portion of the building, and the settlement in 1973, which occurred in the southern portion of the building.

A review of precipitation data indicates a correlation of higher than normal rainfall in 1967 prior to the building settlement and in 1973 prior to settlement in the south wing. It was also noted that the rate of ground water movement was greatest in the area of previous maximum subsidence near the main entranceway.

Field density tests were performed to determine the degree of relative compaction of the existing fill. Compaction ranged from 86 percent to 98 percent, averaging to 92 percent relative compaction.

It was concluded that the cause of the settlement is primarily from the increase in the moisture content of the fill since it was placed, resulting in compression of the fill. Settlement beneath the northern portion of the building was due to groundwater migration. Settlement of the southern portion of the building is due mainly to surface water infiltration, possibly from the construction and irrigation of Christopher Park, which was completed in 1971. The natural soils below the fill were determined to be overconsolidated.

Slight additional settlement of the northern portion of the building was predicted. Continued settlement of the south end of the two-story wing was predicted at a rate of about 1-1/2 to 2 inches per year. A total of 11 inches of settlement of the two-story wing was measured at the time of the report in 1977.

It was concluded that, "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.

Four courses of action were suggested: 1) Continue to monitor movement of the building and repair the two-story wing. 2) Demolish and remove the two-story wing or portions of it, and possibly build a new building in its location. 3) Continue monitoring of movement in the northern portion of the building. 4) Continue the monitoring program through several wet seasons to establish effects of future rainfall on the site.

On March 13, 1979, Harding-Lawson Associates issued a final report addressing the settlement monitoring at the site. There was slight lateral movement of the fill, but there were no indications to suggest a potential landslide. Settlement was still occurring within the two-story wing.

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FIELD EXPLORATION AND LABORATORY TESTING

The subsurface conditions were explored by drilling a total of three borings at the locations shown on the Plot Plan, Plate 1. The borings were drilled with a truck-mounted rotary-wash drill rig to depths ranging from about 26-1/2 feet to 31-1/2 feet below the existing ground surface.

The field exploration was performed under the technical direction of one of our engineers who examined and visually classified the soils encountered, maintained a continuous log of boring, and obtained both relatively undisturbed and disturbed samples for laboratory examination and testing. Graphical presentation of the soils encountered is presented on the Log of Boring, Plates 2A through 2C. An explanation of the nomenclature and symbols used on the log of boring is shown on Plate 3, Soil Classification Chart & Key To Test Data. The log of boring shows subsurface conditions on the date and at the location indicated, and it is not warranted that it is representative of the subsurface conditions at other times or locations.

Laboratory tests were performed on selected soil samples to correlate the soil properties and to evaluate the engineering characteristics. Moisture content and dry density tests were performed on selected relatively undisturbed soil samples, and moisture content tests were performed on Standard Penetration Test (SPT) samples. The results of the laboratory testing are presented on the log of boring at the appropriate sample locations. Compaction test was performed on a representative sample of the fill material.

SITE CONDITIONS**SURFACE CONDITIONS**

The San Francisco Police Academy occupies the same building formerly housing the Diamond Heights Elementary School. The playground area east of the building is currently being used as a parking lot. Based on visual observation, it appears that a portion of the southern end of the two-story wing of the original building has been removed. The two-story wing of the building currently appears substantially shorter on the southern end than in the aerial photographs and drawings dating back to 1977; however, records of the speculated demolition were not available.

Visible lateral movement of the building and the paved area was not observed at the site. The floor slabs in the hallways were noted to be sloping. Significant cracks were observed along the east wall of the northern portion of the building.

SUBSURFACE CONDITIONS

Fill was encountered to the depths explored in the three borings drilled for this investigation. Medium stiff to stiff gravelly clay with rock fragments was encountered in Borings 1 & 2 to a depth of 18 feet and 20 feet, respectively, below the existing ground surface. In Boring 1, the gravelly clay was underlain by stiff sandy clay to the depth explored. In Boring 2, the gravelly clay was underlain by loose to medium dense clayey gravel to the depth explored. Stiff sandy clay was encountered in Boring 3 to a depth of 8 feet below the existing ground surface. The stiff sandy clay was underlain by medium dense, wet, clayey gravel with rock fragments to a depth of 20 feet. The clayey gravel was

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underlain by medium dense clayey gravel and sand to a depth of 26 feet. Medium dense clayey gravel was encountered below the clayey gravel and sand to the depth explored in Boring 3.

SEISMIC CONSIDERATIONS

The site is located in the seismically active San Francisco Bay Area and is subject to the effects of large magnitude earthquakes. The significant earthquakes that have occurred in the Bay Area are generally associated with crustal movement along well-defined active fault zones. The major faults include the San Andreas and Hayward which are located approximately 5 miles southwest and 13-1/2 miles northeast of the site, respectively.

DISCUSSION AND RECOMMENDATIONS

GENERAL

Based on the boring information for this investigation and available information from previous investigations performed at the site, it appears that the site is underlain by fill of clayey sand, gravel, and rock fragments. The fill appears to be on the order of 35 to 45 feet thick under the northern portion of the building and 60 to 90 feet thick under the southern portion of the building.

In the three borings drilled for this investigation the fill appears to be in a saturated condition with an average degree of saturation on the order of 84 percent to 94 percent. Based on the maximum dry density of 129 pounds per cubic foot, as determined by ASTM D-1557 test procedure, of a representative sample of the fill material it appears that the existing fill was compacted to a density ranging from 86 percent to 98 percent of the maximum dry density. Examination of the samples of the fill material, however, indicates that some of the material appears to be wet and soft. Sampling resistance during drilling of these three borings was lower than those recorded in 1969. Although the fill was substantially compacted, it has been the opinion that settlement should be anticipated from compression of the fill upon saturation.

We understand that the following two distinctly different development schemes are being considered for the site.

- 1) Seismically retrofit the existing building.
- 2) Construct new buildings on the site.

SETTLEMENT

Settlement monitoring was performed on the building during the periods of building settlement in the 1960s and the 1970s. Available records indicate that the last "continuous" settlement monitoring reading was taken in December 1984. For the current investigation a survey of the level of the existing floors and the columns was made by Martin M. Ron Associates in 1998 prior to the discovery of the survey readings performed in the 1980's. Correlation of the survey points for the 1998 elevation readings with readings taken between 1968 and 1984 proved difficult due to the different survey points and the speculated demolition of part of the southern portion of the building. A plot of average floor elevations of the building for 1968, 1969, and 1998, shown on Plate 4, San Francisco Police Academy Average Floor Elevations, indicates that the building has settled between 1968 and 1998.

Settlement of the northern portion of the building occurred in 1967, whereas settlement of the southern portion of the building did not occur until 6 years later in 1973, and was unexpected. The cause of the settlements was attributed to compression of the fill due to saturation. The saturation of the fill in 1967 and 1973 was correlated by Harding-Lawson Associates to higher than normal rainfall in those years. Higher than normal rainfall occurred in the winter of 1997; however, survey readings were not taken between December 1984 and August 1998. Given the large duration of time between the two survey readings, it cannot be concluded that the settlement which occurred between 1984 and 1998 correlates with the higher than normal rainfall in 1997.

It should be noted that the center portion of the building did not experience a large amount of settlement as the northern and southern portions of the building. If saturation of the fill under the center portion of the building should occur, settlement similar to those in the northern and southern portions of the building should be expected. We estimate that the amount of settlement could be on the order of one foot in the center of the building, similar to the occurrences for both the northern and southern portions of the building.

Time-settlement plots of the subject building since 1968, with added readings recently surveyed in 1998, indicate that the building has settled on the order of 1.7 inches between 1984 and 1998. Time-settlement plots are presented in Plates 5A through 5E, San Francisco Police Academy Floor Elevations - Arithmetic Scale, and Plates 6A through 6E, San Francisco Police Academy Floor Elevations - Semi-logarithmic Scale. We anticipate that the rate of settlement would be diminishing. It is difficult to predict, with any reasonable accuracy, the amount of the anticipated settlements and the period over which the settlements will occur, given that the period of settlement in 1973 was unforeseen and that the speculated causes of the previous settlements have not been conclusive. Additional settlement of 2 to 3 inches over the next 15 years may occur at a rate of 1/8 inch per year, assuming that saturation of the fill under the center portion of the building does not occur.

SCHEME 1: SEISMIC RETROFIT

For seismic retrofit, we recommend that the proposed shear walls or other structural elements be supported on a shallow foundation of spread footings bearing on the compacted fill, in a similar manner as the existing foundation footings. We recommend that possible significant settlement of the center portion of the building should be taken into consideration.

Foundation Support

For the proposed shear walls and other structural elements, we recommend a shallow foundation of spread footings bearing on the compacted fill using an allowable bearing pressure of 2,000 pounds per square foot for dead plus live loads. The allowable bearing pressures may be increased by one-third for total design loads, including wind or seismic. The footings should be founded at least 18 inches below the lowest adjacent grade. Continuous footings should be at least 24 inches wide. The weight of the foundation concrete below grade may be neglected in computing bearing pressures.

In consideration of the potential of significant ground shaking, the structures should be designed with seismic forces in mind. To resist seismic effects, we suggest that the footings be tied together with grade beams or a diaphragm slab.

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Resistance to lateral loads can be developed in friction between the foundation and the supporting subgrade using a frictional resistance of 0.3. Additional resistance may be developed by passive pressure of 250 pounds per cubic foot for the portion of the footings and grade beams embedded in the soil. Unless the surface is paved, the upper foot of soil should be neglected in computing the passive resistance.

We estimate that the settlement due to structural loads from the structural elements founded on a shallow foundation of isolated and continuous footings, designed and constructed as discussed above, will be relatively small, probably less than one inch.

Settlement Monitoring

We recommend that a program of monitoring and evaluation of building performance be adopted. As part of this, we recommend that elevation readings be taken at representative locations on the foundations and floor slab at regular time intervals. This record would be reviewed by our office and your structural engineer.

SCHEME 2: NEW CONSTRUCTION

For construction of new facilities at the site, we recommend that the proposed buildings be supported on a shallow foundation bearing on the existing fill and/or compacted fill.

The large amount of settlement which occurred in the southern portion of the building in 1976 was unpredicted and unexpected. Although we do not anticipate that total and differential settlements of such magnitude would occur, it is prudent to plan for such unexpected settlements.

Foundation Support

The foundation should be laid out in a grid-like pattern which ties all of the foundation elements together in two directions in order to resist deflection resulting from settlements and seismic effects. For spread footings bearing on the existing fill or on compacted fill after appropriate site preparation, we recommend that the footings be designed using an allowable bearing pressure of 2,000 pounds per square foot for dead plus live loads. The allowable bearing pressures may be increased by one-third for total design load, including wind or seismic. The footings should be founded at least 18 inches below the lowest adjacent grade. Continuous footings should be at least 15 inches wide, and isolated spread footings should be at least 24 inches wide. The weight of the foundation concrete below grade may be neglected in computing the bearing pressures.

In order to resist the effect of differential settlement, the wall footings and grade beams should be designed as stiff strong beams capable of resisting both positive and negative moments. We suggest that they be designed to span at least 20 feet carrying the full structural load (dead plus real live loads above the foundation level). Continuity of beam strength should be maintained at locations such as steps in footings, offsets of footings, etc.

Resistance to lateral loads can be developed in friction between the footing and the compacted fill using a coefficient of friction of 0.3. Additional resistance may be developed by a passive pressure of 250 pounds per cubic foot for the portion of the footings and grade beams below grade. Unless

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the surface is paved, the upper foot of embedment should be neglected in computing the passive resistance.

We estimate that the settlement of the structure, due to structural loads, founded on a shallow foundation of isolated and contiguous footings, designed and constructed as discussed above, will be relatively small, probably less than one inch.

As an alternative to spread footings and grade beams, the structures may be supported on a mat foundation bearing on the fill after appropriate site preparation. The bottom of the mat foundation should be founded at least 12 inches below the lowest adjacent grade. The foundation should be reinforced to resist bending equally in either an upward or downward direction. This is intended to provide strength to redistribute loads and also to minimize differential settlements caused by variations in the underlying soil. Sufficient reinforcement should be provided in the mat to distribute the superimposed structural loads assuming a span of 20 feet at any location and cantilever of 10 feet (but not more than one-quarter the dimension of the building).

Settlement Monitoring

In view of the possibility of significant total and differential settlements, we recommend that a program of monitoring and evaluation of building performance be adopted. As part of this, we recommend that elevation readings be taken at representative locations on the foundations and floor slab at the time of pouring, at completion of construction, and at appropriate times thereafter. This record would be reviewed by our office and your structural engineer. Knowledge of the details of settlement behavior will be valuable in case remedial measures become necessary or if differential settlements are suspected of contributing to building distress. Periodic releveled of the buildings should be anticipated and may be required to provide proper performance of the buildings. It is our opinion that a stiff foundation with monitoring of settlement, and possible releveled, would provide satisfactory foundation support.

SITE PREPARATION

The intent of this work is to provide well-compacted soil to support the building foundation.

We recommend the following minimum procedures be undertaken for site preparation in the construction area and extending at least 5 feet beyond the perimeter of the building area. The lateral extent of the site preparation will be restricted along the property lines and existing buildings and facilities. The work should be carried out under the observation and testing of our geotechnical engineering staff.

1. Remove all existing pavements, concrete walkways, curb and gutter and other deleterious debris and dispose off site. Remove all below grade construction, obstructions or debris and dispose off site.
2. After performing the required cutting operation and prior to any filling, proofroll the exposed surface with at least six passes of a heavy vibrating compactor, such as Dynapac CA-15, Rascal 303-A, Ingersoll-Rand SP-48 or equal.

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In areas showing extensive weaving or pumping and where loose or soft soils are found at the bottom of the exposed surface, excavate to greater depth and replace with compacted materials as required.

3. After proofrolling, scarify the exposed surface to a depth of at least 8 inches and condition to near optimum moisture content and compact to at least 90 percent of the maximum dry density as determined by ASTM D-1557 test procedure.
4. Place the backfill and fill to meet design grade in layers not exceeding 8 inches thick (loose condition), condition to approximately optimum moisture content and compact to at least 90 percent of the maximum dry density as determined by the ASTM D-1557 test procedure.

Structure backfill and backfill for utility trenches should be placed in the manner described in item 4.

All excavations should be dewatered prior to placement of backfill or fill. It is recommended that jetting of fill and backfill for compaction not be permitted.

REPORT LIMITATIONS

Our services have been performed with the usual thoroughness and competence of the engineering profession. No other warranty or representation, either expressed or implied, is included or intended.

The conclusions and recommendations presented in this report are professional opinions based on project criteria and data described in this report, and are intended only for the purpose, site location and project indicated. If there is a significant change in the project, or if different soils are encountered from those indicated, Trans Pacific Geotechnical Consultants, Inc. should be notified for evaluation and supplemental recommendations as necessary or appropriate.

Trans Pacific Geotechnical Consultants, Inc. cannot be responsible for interpretations made by others with regard to foundation support or other recommendations presented in this report.

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CLOSURE

It is suggested that our office be consulted during design to answer any questions and provide clarification regarding our report. We request an opportunity to review appropriate portions of the final plans and specifications. Adequate engineering observation and testing should be provided during construction to provide reasonable assurance that pertinent provisions of the plans and specifications are properly carried out.

If you have any questions regarding this report, please contact us. The following plates are attached and complete this report.

Plate 1	Plot Plan
Plate 2A through 2C	Log of Boring
Plate 3	Soil Classification Chart & Key to Test Data
Plate 4	San Francisco Police Academy Average Floor Elevations
Plate 5A through 5E	San Francisco Police Academy Floor Elevations Arithmetic Scale
Plate 6A through 6E	San Francisco Police Academy Floor Elevations Semi-logarithmic Scale

Yours very truly,
Trans Pacific Geotechnical Consultants, Inc.

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Eddy T. Lau, P.E.
Reg. Civil Engineer 019897
Reg. Geotechnical Engineer 506
Expiration 9/30/2001

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Marlene Wong
Project Engineer

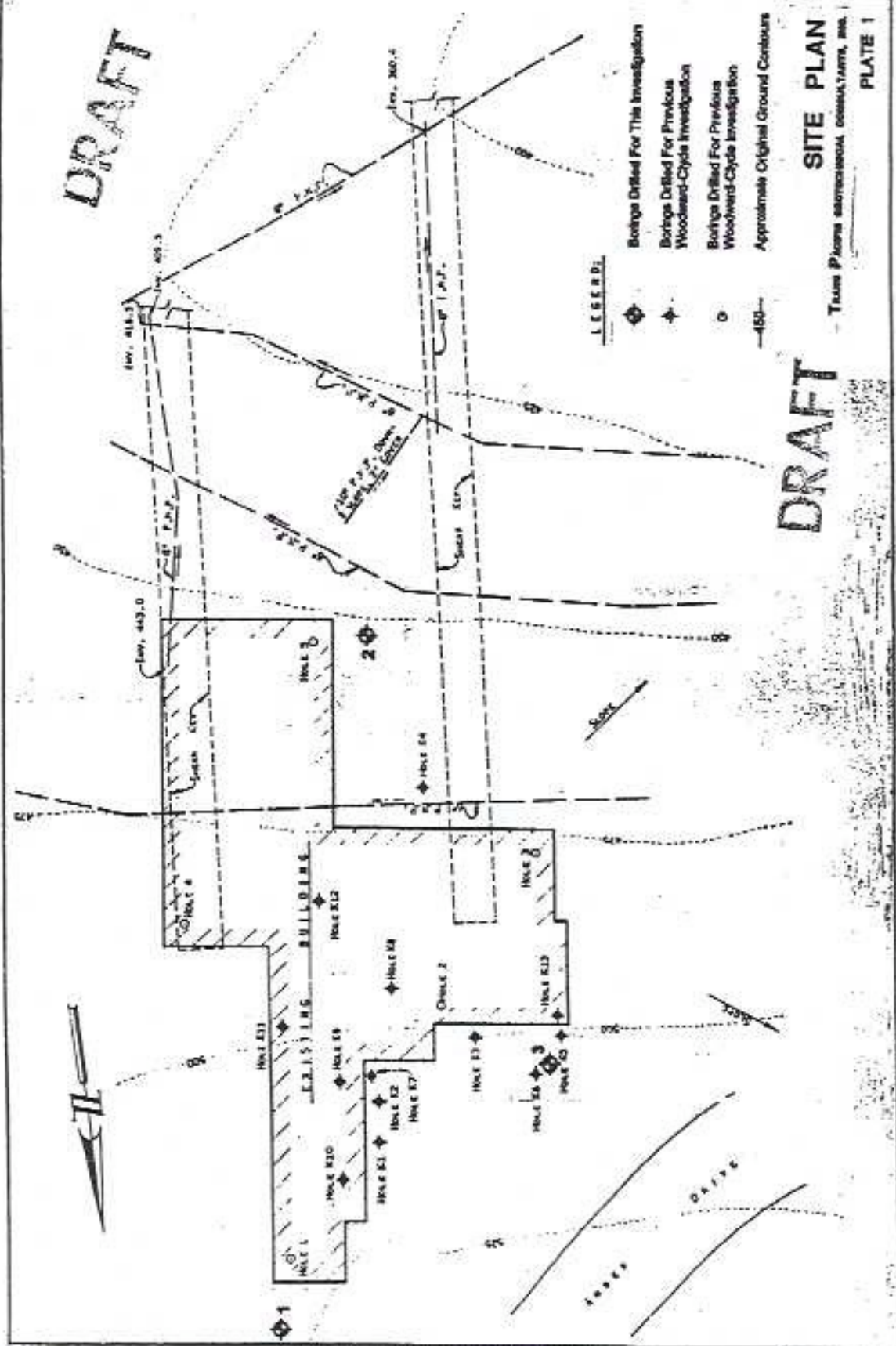
(Six copies submitted)

cc: Baker & Vilar Architects (2)
461 Second Street, Suite C127
San Francisco, California 94107
Attention: Mr. Jose Vilar

SOHA Engineers (2)
550 Kearny Street, Suite 200
San Francisco, California 94108
Attention: Mr. John Earle

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SITE PLAN

Телескопическая лестница

PLATE 1

DEPTH IN FEET	LAB DATA		SAMPLING	
	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLER TYPE	SAMPLING RESISTANCE
0				
17	17	111	MC	
5	16	116	MC	22
10	16	116	MC	22
15	15	117	MC	34
20	16	115	MC	27
25			MC	26
30	25	104	MC	14
35				

BORING 1

DATE DRILLED: 9/8/98

ELEVATION: feet

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SAMPLES	SYMBOLS	DESCRIPTION
		4in. Asphaltic Concrete over 8 in. Aggregate Base
	GC	Yellowish brown gravelly CLAY, (medium stiff to stiff)
		(grading dark brown with rock fragments, stiff to very stiff)
	GC	Reddish brown clayey GRAVEL, (stiff)
	GC	Green and dark gray gravelly CLAY, (medium stiff to stiff)
	SC	Yellowish brown sandy CLAY, (stiff)
		(grading clayey and with rock fragments, medium stiff)

NOTES:

1. Boring terminated at a depth of 31.5 feet.
2. Sampling resistance is measured in blows per foot required to drive the sampler 12 inches with a 140 lb. hammer falling 30 inches after sampler has been seated 6 inches.
3. Boring log indicates interpreted subsurface conditions only at the location and the time the boring was drilled.
4. For an explanation of terms used see the Soil Classification Chart and Key to Test Data, Plate 3.

LOG OF BORING

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BORING 2

DATE DRILLED: 9/8/98

ELEVATION: feet

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DEPTH IN FEET	LAB DATA		SAMPLING	
	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLER TYPE	SAMPLING RESISTANCE
0				
17	17	115	MC	30
5	8	119	MC	27
10	17	119	MC	36
15	11	131	MC	31
20			MC	41
25	8	127	MC	26
30				
35				

SAMPLES	SYMBOLS	DESCRIPTION
		2in. Asphaltic Concrete over 6in. Aggregate Base
	GC	Brown gravelly CLAY with abundant rock fragments, dry, (stiff)
	GC	Yellowish brown gravelly CLAY with rock fragments, wet, (medium stiff to stiff)
	GC	Grayish brown clayey GRAVEL, (loose to medium dense)

NOTES:

1. Boring terminated at a depth of 26.5 feet.
2. Sampling resistance is measured in blows per foot required to drive the sampler 12 inches with a 140 lb. hammer falling 30 inches after sampler has been seated 6 inches.
3. Boring log indicates interpreted subsurface conditions only at the location and the time the boring was drilled.
4. For an explanation of terms used see the Soil Classification Chart and Key to Test Data, Plate 3.

LOG OF BORING

Trans Pacific Geotechnical Consultants, Inc.

DEPTH IN FEET	LAB DATA		SAMPLING	
	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLER TYPE	SAMPLING RESISTANCE
0				
13	13	115	MC	13
5	18	109	MC	17
10	12	123	MC	43
15	8	133	MC	34
20	4	115	MC	35
25			MC	20
30	8	129	MC	52
35				

BORING 3

DATE DRILLED: 9/8/98

ELEVATION: feet

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SAMPLES

SYMBOLS DESCRIPTION

		2in. Asphaltic Concrete over 6in. Aggregate Base
SC		Brown sandy CLAY, moist, (stiff)
GC		Reddish brown clayey GRAVEL with abundant rock fragments, wet, (medium dense) (grading more clayey)
GC-SC		Brown clayey GRAVEL and SAND, wet, (medium dense) (grading loose and less gravelly)
GC		Grayish brown clayey gravel, medium dense)

NOTES:

1. Boring terminated at a depth of 31.5 feet.
2. Sampling resistance is measured in blows per foot required to drive the sampler 12 inches with a 140 lb. hammer falling 30 inches after sampler has been seated 6 inches.
3. Boring log indicates interpreted subsurface conditions only at the location and the time the boring was drilled.
4. For an explanation of terms used see the Soil Classification Chart and Key to Test Data, Plate 3.

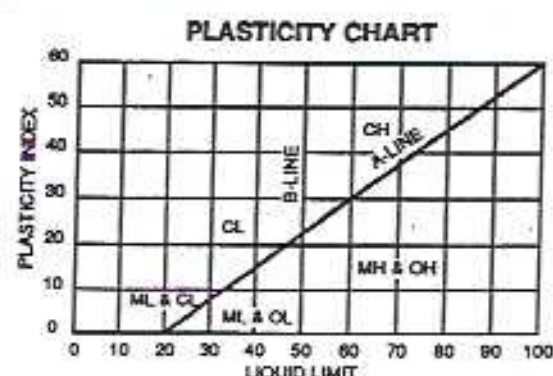
LOG OF BORING

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PLATE 2C

UNIFIED SOIL CLASSIFICATION SYSTEM

SYMBOL	LETTER	DESCRIPTION	MAJOR DIVISIONS		
	GW	WELL-GRADED GRAVELS, GRAVEL-SAND MIXTURES, LITTLE OR NO FINES	CLEAN GRAVELS (LITTLE OR NO FINES)	GRAVELS MORE THAN 50% OF COARSE FRACTION RETAINED ON NO. 4 SIEVE	COARSE-GRAINED SOILS MORE THAN 50% OF MATERIAL IS RETAINED ON NO. 200 SIEVE FOR VISUAL CLASSIFICATION, THE 1/4" SIZE MAY BE USED AS EQUIVALENT TO THE NO. 4 SIEVE SIZE
	GP	POORLY-GRADED GRAVELS, GRAVEL-SAND MIXTURES, LITTLE OR NO FINES			
	GM	SILTY GRAVELS, GRAVEL-SAND-SILT MIXTURES	GRAVELS WITH FINES (APPRECIABLE AMOUNT OF FINES)		
	GC	CLAYEY GRAVELS, GRAVEL-SAND-CLAY MIXTURES			
	SW	WELL-GRADED SAND, GRAVELLY SANDS, LITTLE OR NO FINES	CLEAN SANDS (LITTLE OR NO FINES)	SANDS 50% OR MORE OF COARSE FRACTION PASSES NO. 4 SIEVE	
	SP	POORLY-GRADED SANDS, GRAVELLY SANDS, LITTLE OR NO FINES			
	SM	SILTY SANDS, SAND-SILT MIXTURES	SANDS WITH FINES (APPRECIABLE AMOUNT OF FINES)		
	SC	CLAYEY SANDS, SAND-CLAY MIXTURES			
	ML	INORGANIC SILTS AND VERY FINE SANDS, ROCK FLOUR, SILTY OR CLAYEY FINE SANDS, CLAYEY SILTS WITH SLIGHT PLASTICITY	SILTS & CLAYS (LIQUID LIMIT LESS THAN 50)		FINE-GRAINED SOILS 50% OR MORE OF MATERIAL PASSES THE NO. 200 SIEVE THE NO. 200 U.S. STANDARD SIEVE SIZE IS ABOUT THE SMALLEST PARTICLE VISIBLE TO THE NAKED EYE
	CL	INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS, SILTY CLAYS, LEAN CLAYS			
	OL	ORGANIC SILTS AND ORGANIC SILT-CLAYS OF LOW PLASTICITY			
	MH	INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS FINE SANDY OR SILTY SOILS, ELASTIC SILTS	SILTS & CLAYS (LIQUID LIMIT 50 OR MORE)		
	CH	INORGANIC CLAYS OF HIGH PLASTICITY, FAT CLAYS			
	OH	ORGANIC CLAYS OF MEDIUM TO HIGH PLASTICITY, ORGANIC SILTS			
	PT	PEAT AND OTHER HIGHLY ORGANIC SOILS	HIGHLY ORGANIC SOILS		



TYPES OF SOIL SAMPLERS

- MC - MODIFIED CALIFORNIA SAMPLER
- NX - ROCK CORING
- P - PISTON SAMPLER
- PT - PITCHER BARREL SAMPLER
- S - SHELBY SAMPLER
- SPT - STANDARD PENETRATION TEST SAMPLER
- U - UNDERWATER SAMPLER

KEY TO SAMPLES

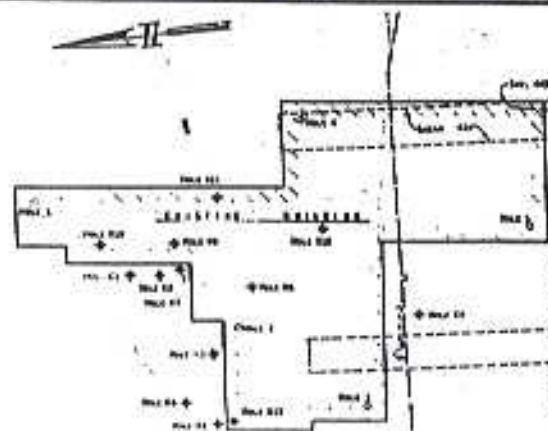
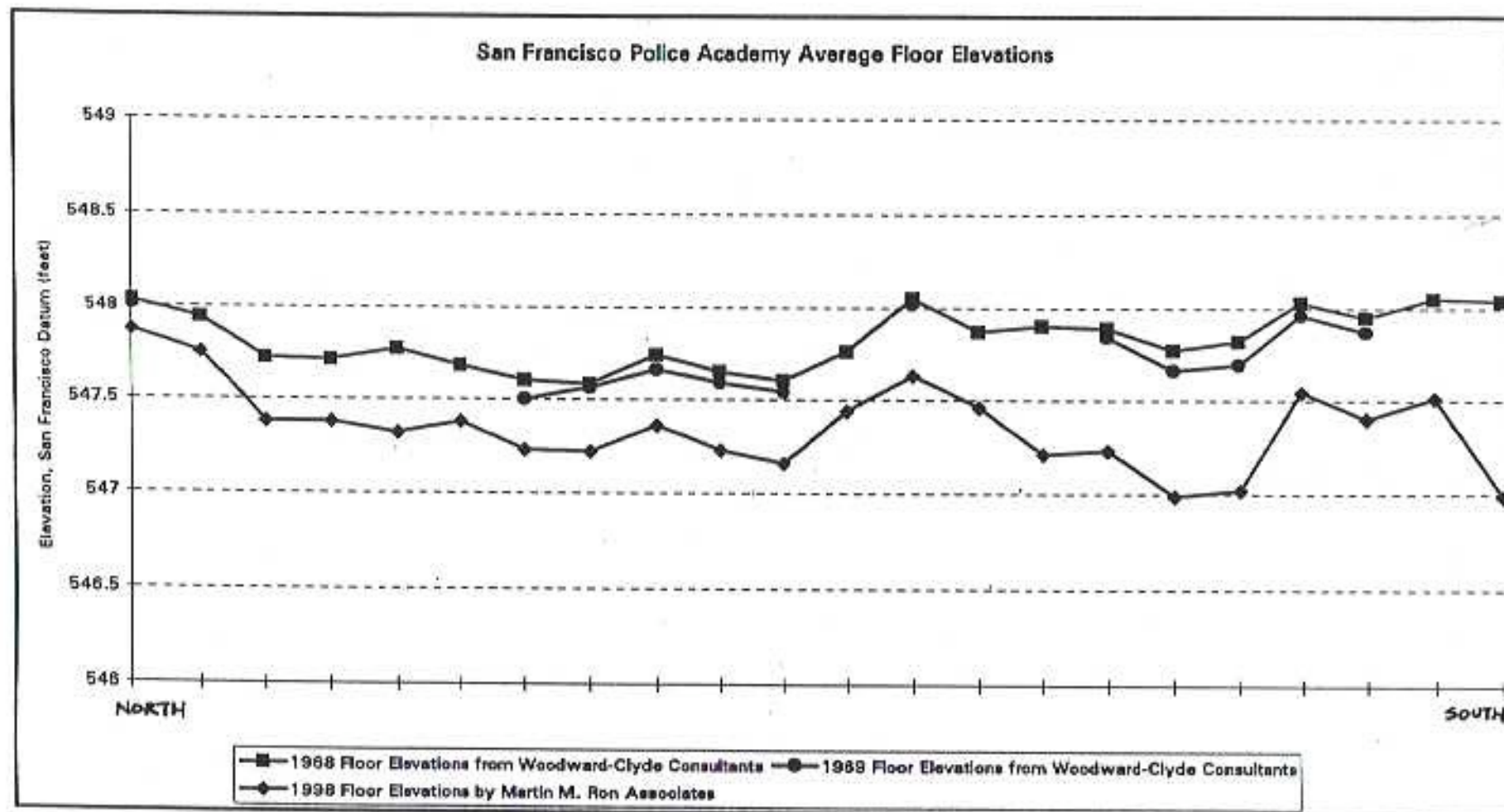
- INDICATES DEPTH OF UNDISTURBED SAMPLE
- INDICATES DEPTH OF DISTURBED SAMPLE
- INDICATES DEPTH OF SAMPLING ATTEMPT WITH NO RECOVERY
- INDICATES DEPTH OF STANDARD PENETRATION TEST
- INDICATES DEPTH OF UNDISTURBED "S" (SHELBY) TYPE SAMPLE

KEY TO TEST DATA

- GS - GRAIN-SIZE DISTRIBUTION
- DSCU - DIRECT SHEAR TEST, CONSOLIDATED - UNDRAINED
- DSUU - DIRECT SHEAR TEST, UNCONSOLIDATED - UNDRAINED
- TXUU - TRIAXIAL COMPRESSION TEST, UNCONSOLIDATED - UNDRAINED

SOIL CLASSIFICATION CHART AND KEY TO TEST DATA

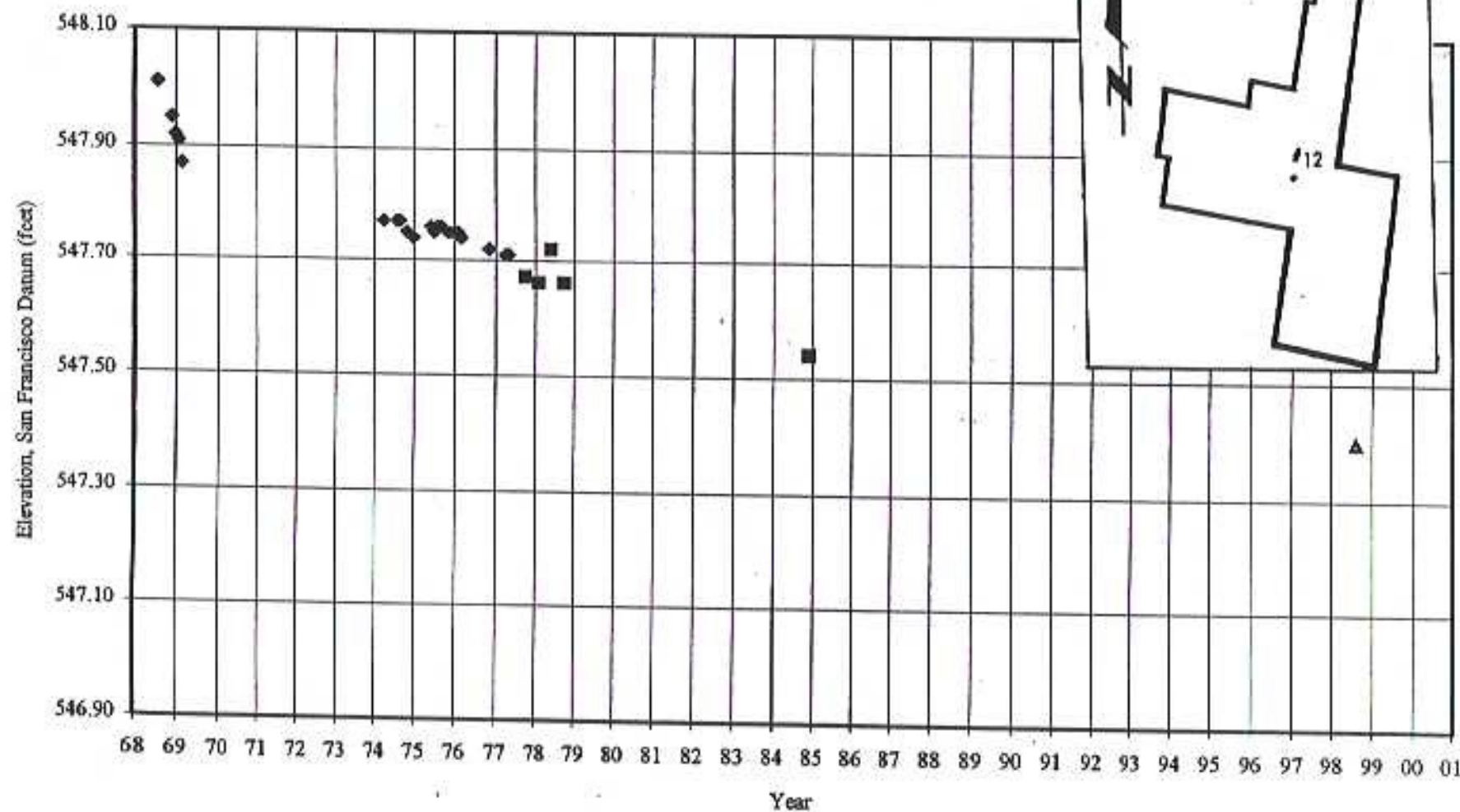
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San Francisco Police Academy Floor Elevations Point No.12



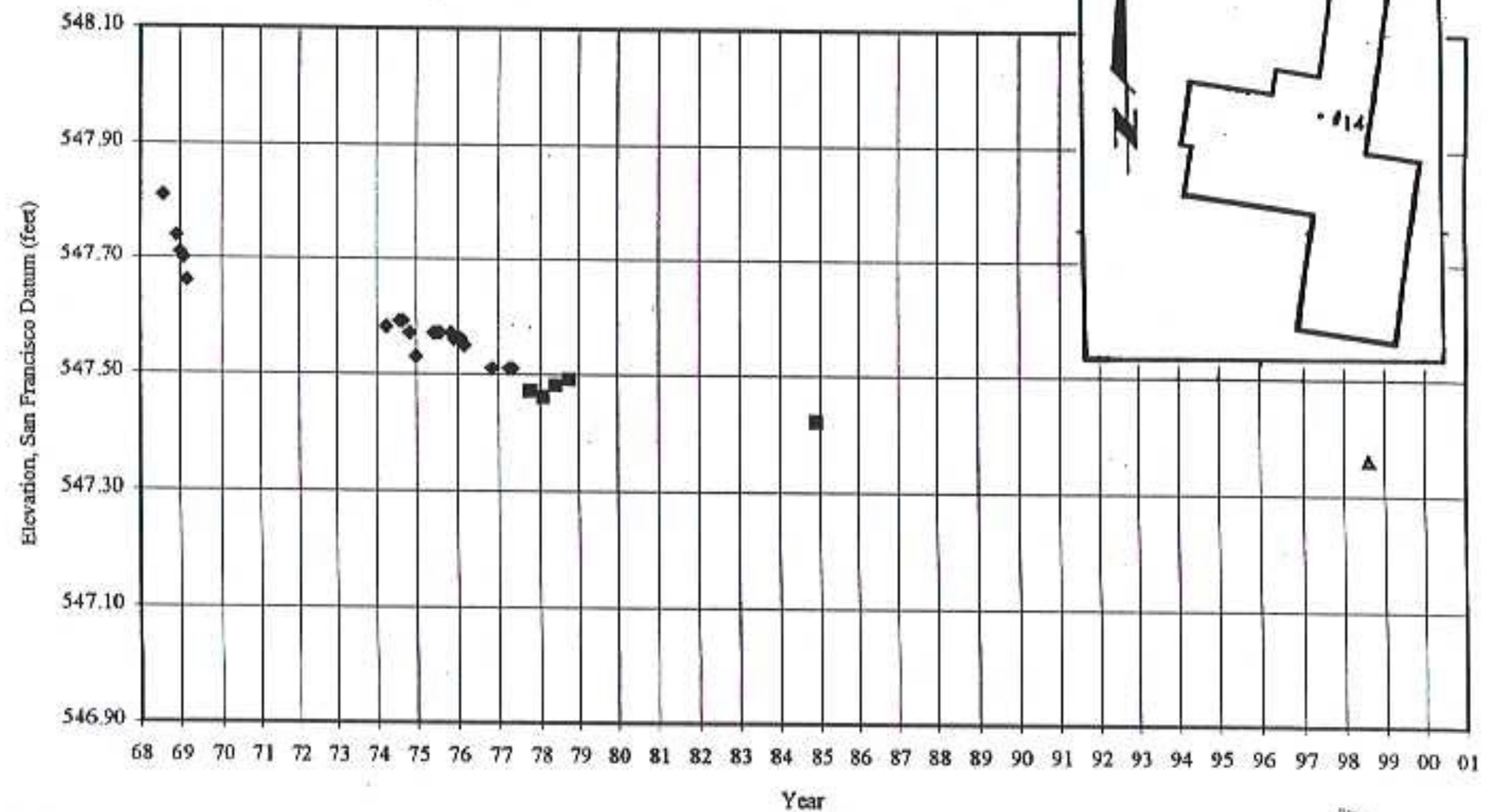
◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

*Reading is in vicinity of Point No. 12

Trans Pacific Geotechnical Consultants, Inc.

PLATE 5A

San Francisco Police Academy Floor Elevations Point No. 14



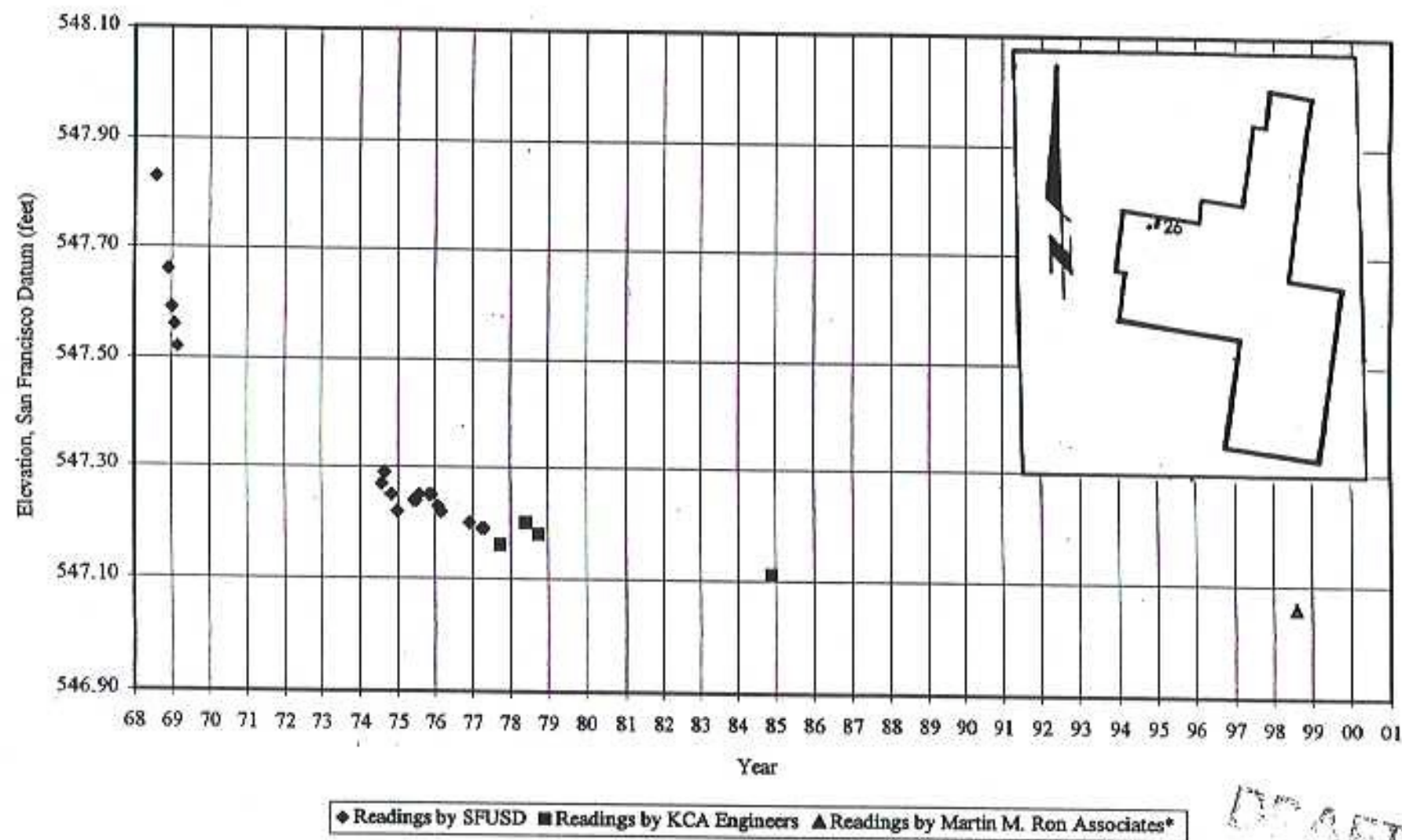
◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

*Reading is in vicinity of Point No. 14

Trans Pacific Geotechnical Consultants, Inc.

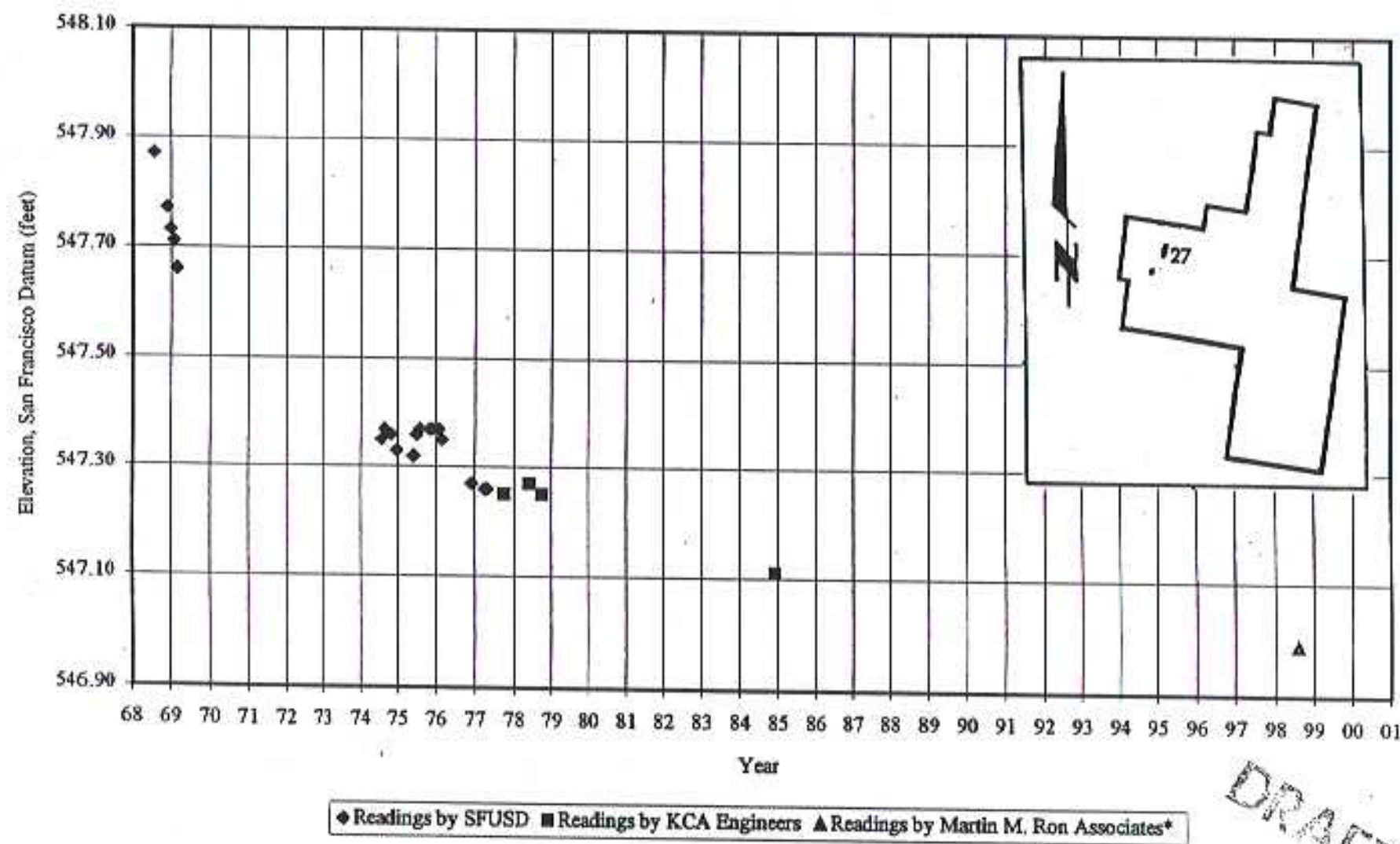
PLATE 5B

San Francisco Police Academy Floor Elevations Point No.26



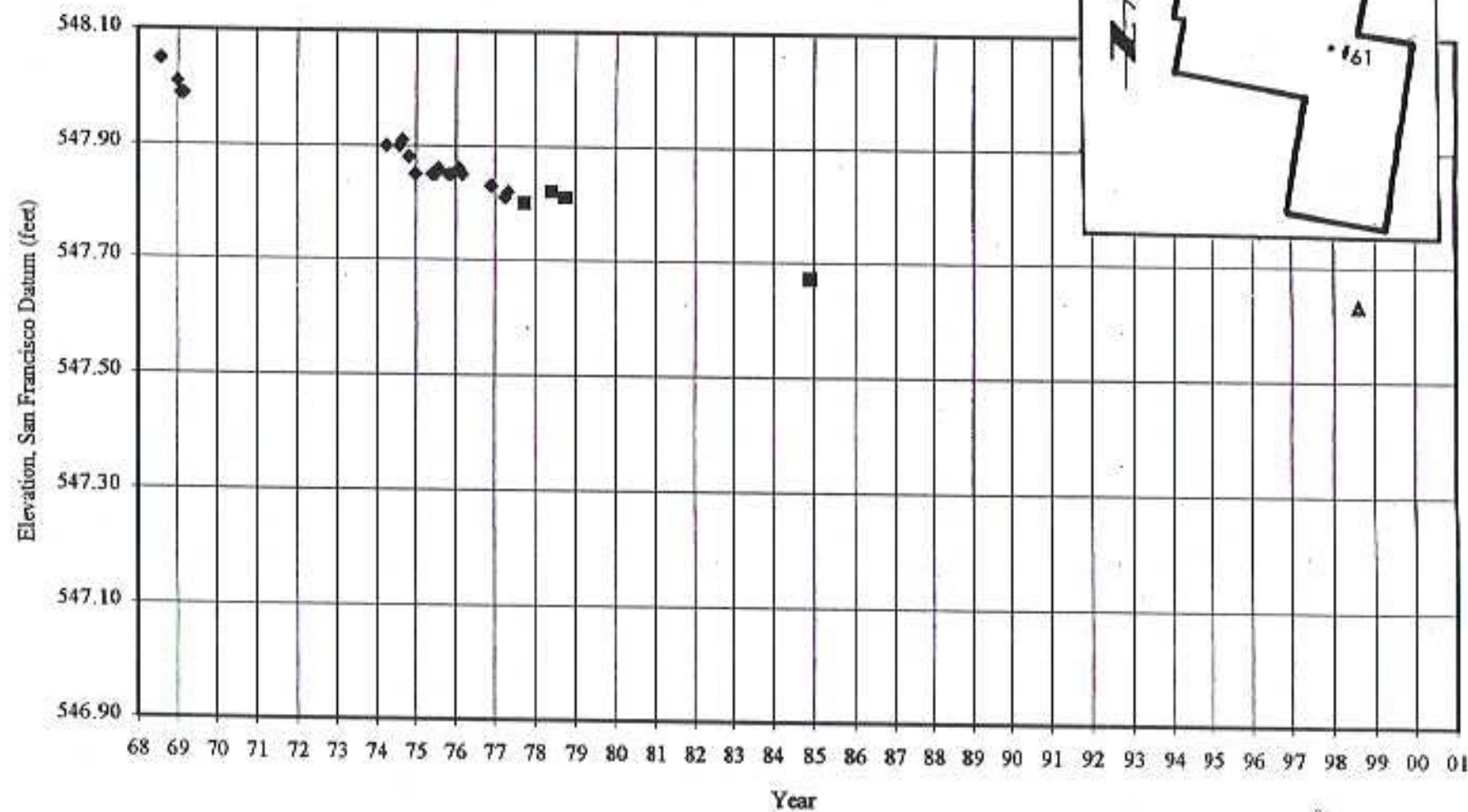
*Reading is in vicinity of Point No. 26

San Francisco Police Academy Floor Elevations Point No.27



*Reading is in vicinity of Point No. 27

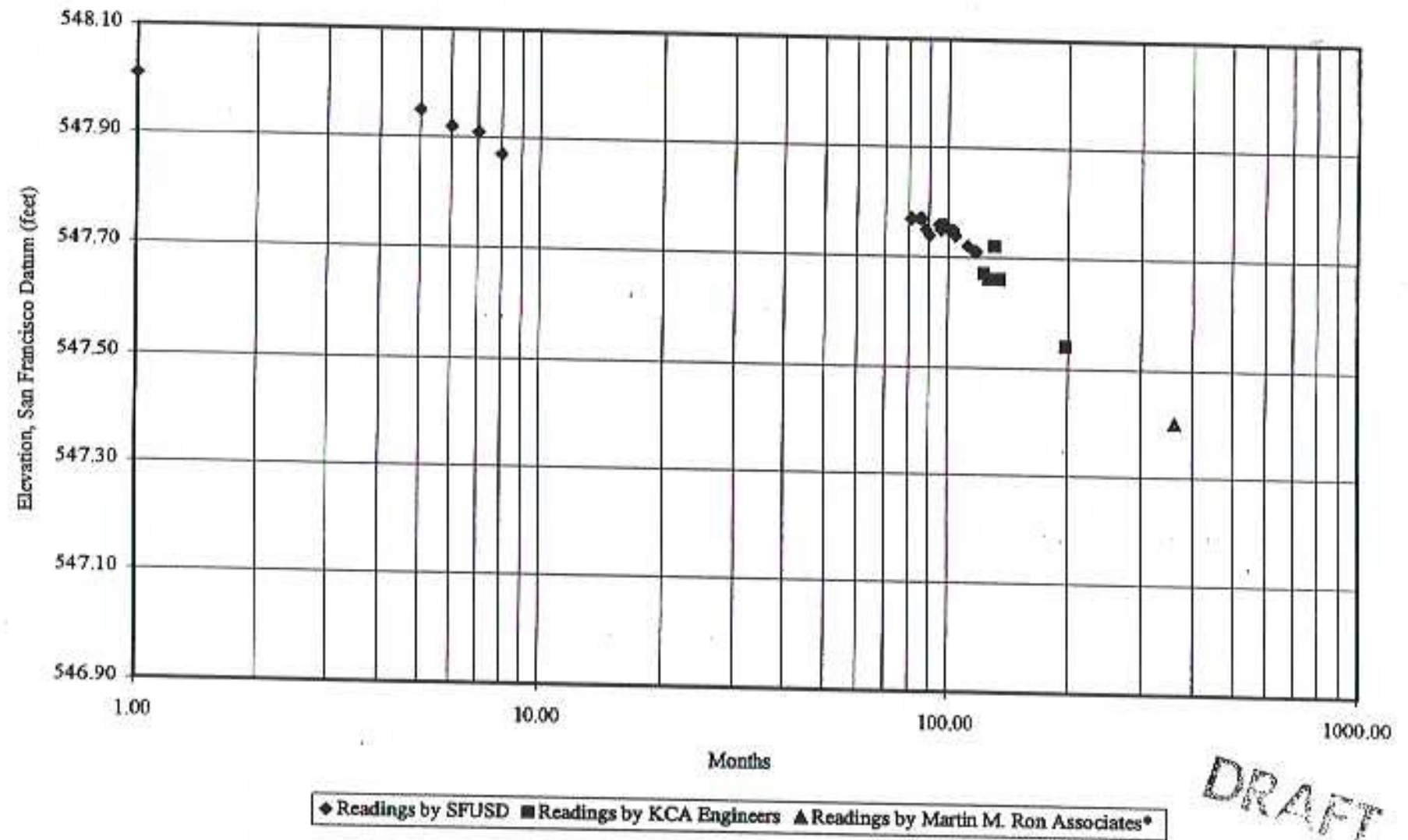
San Francisco Police Academy Floor Elevations Point No. 61



◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

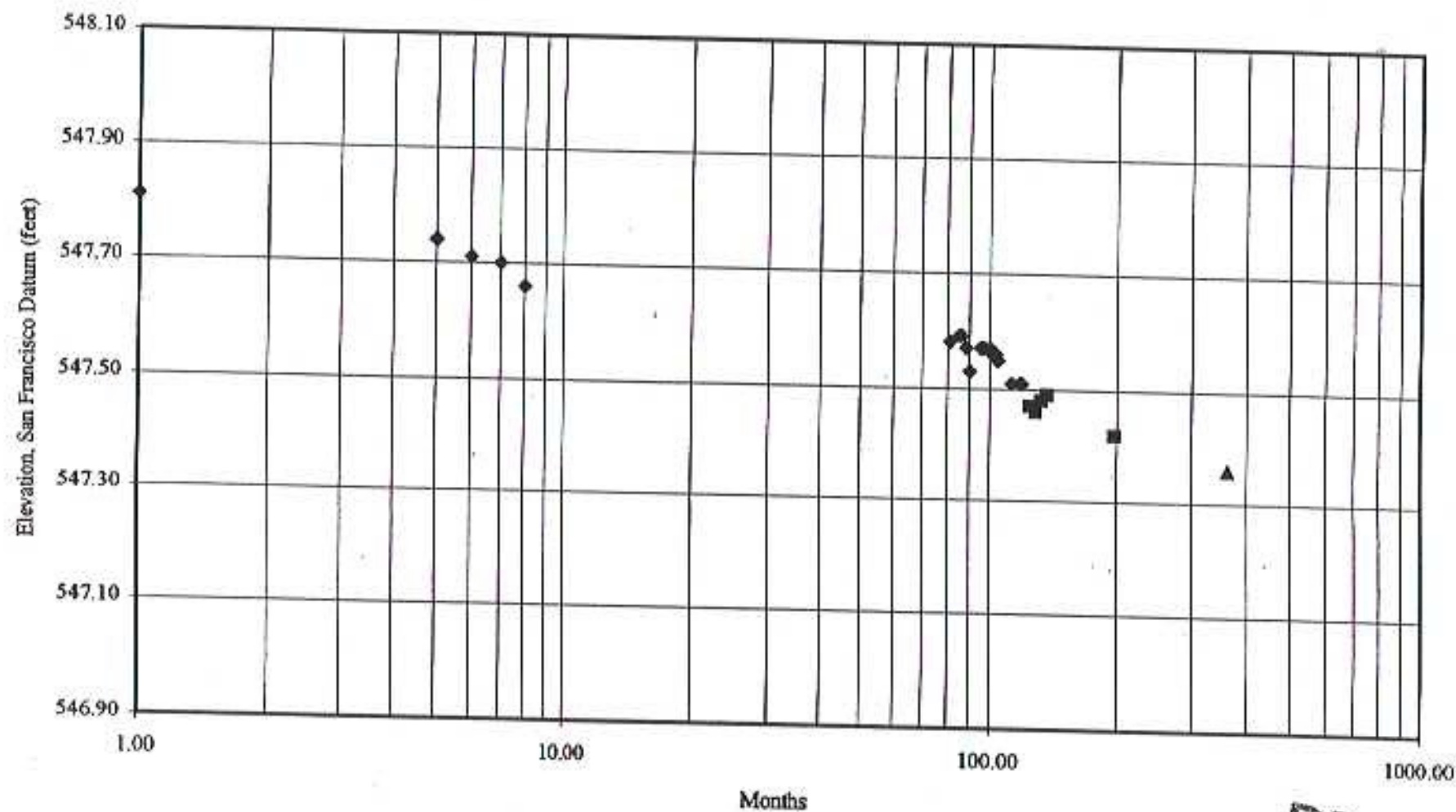
*Reading is in vicinity of Point No. 61

San Francisco Police Academy Floor Elevations
Point No.12



*Reading is in vicinity of Point No. 12

San Francisco Police Academy Floor Elevations Point No.14

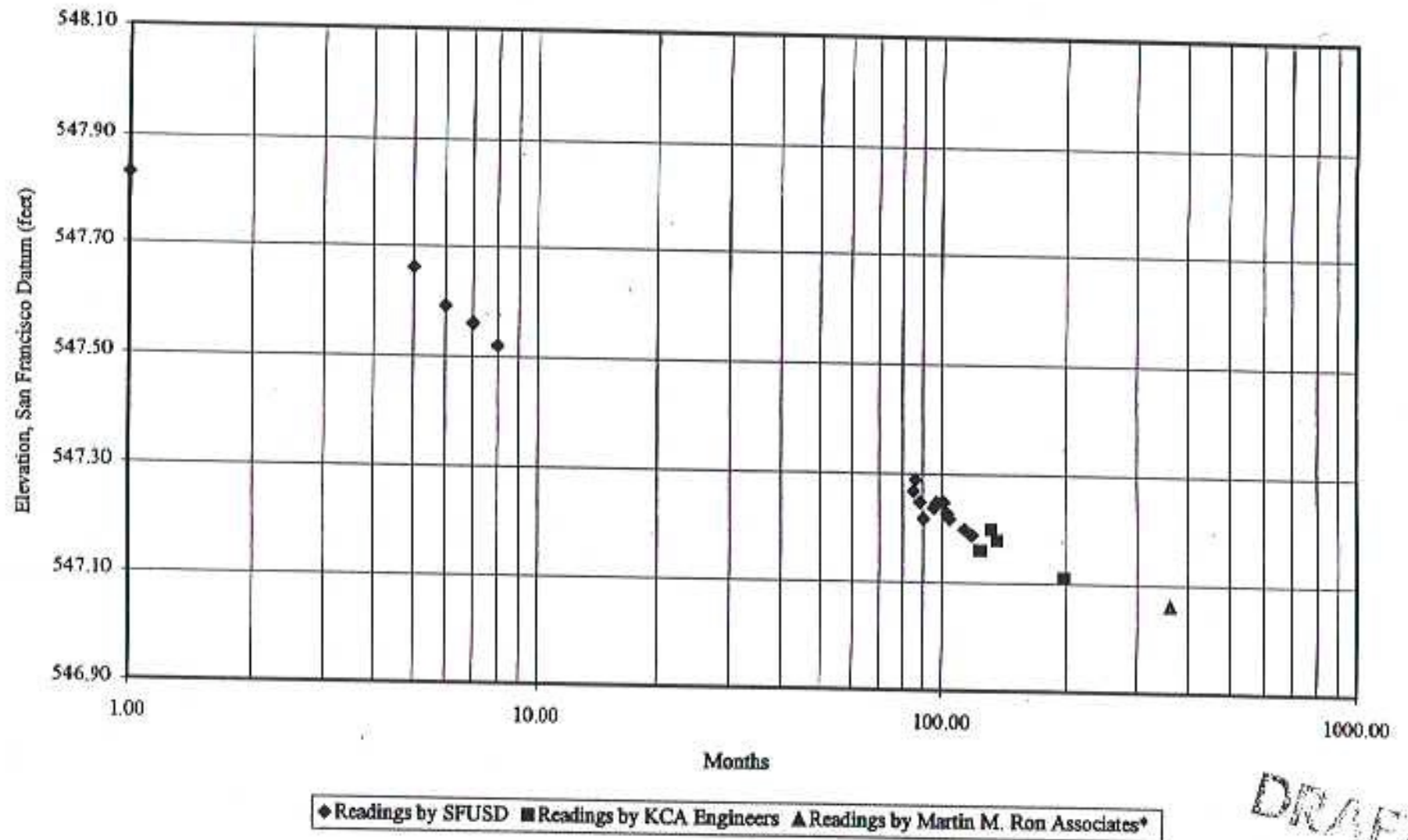


◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

DRAFT

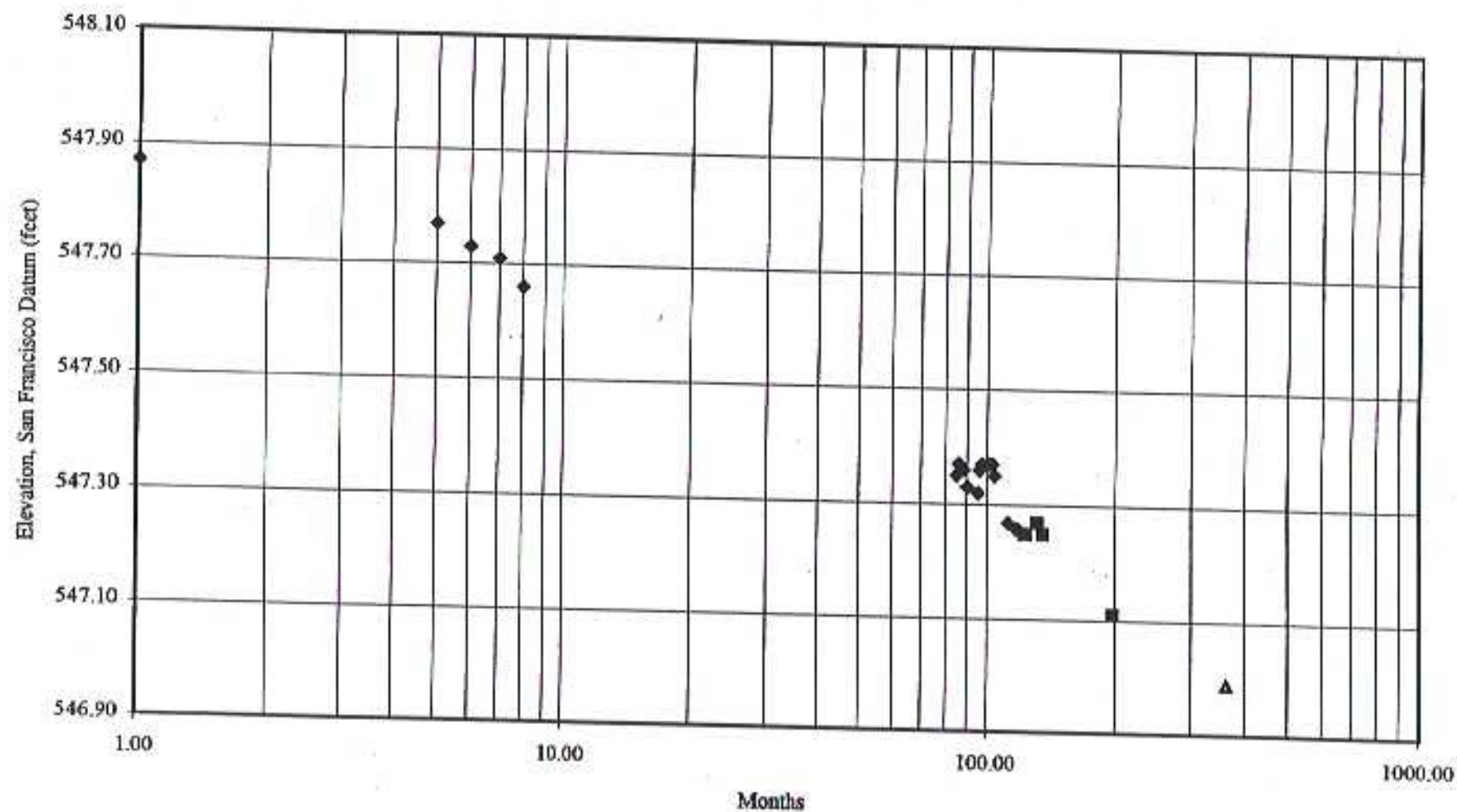
*Reading is in vicinity of Point No. 14

San Francisco Police Academy Floor Elevations
Point No.26



*Reading is in vicinity of Point No. 26

San Francisco Police Academy Floor Elevations Point No.27



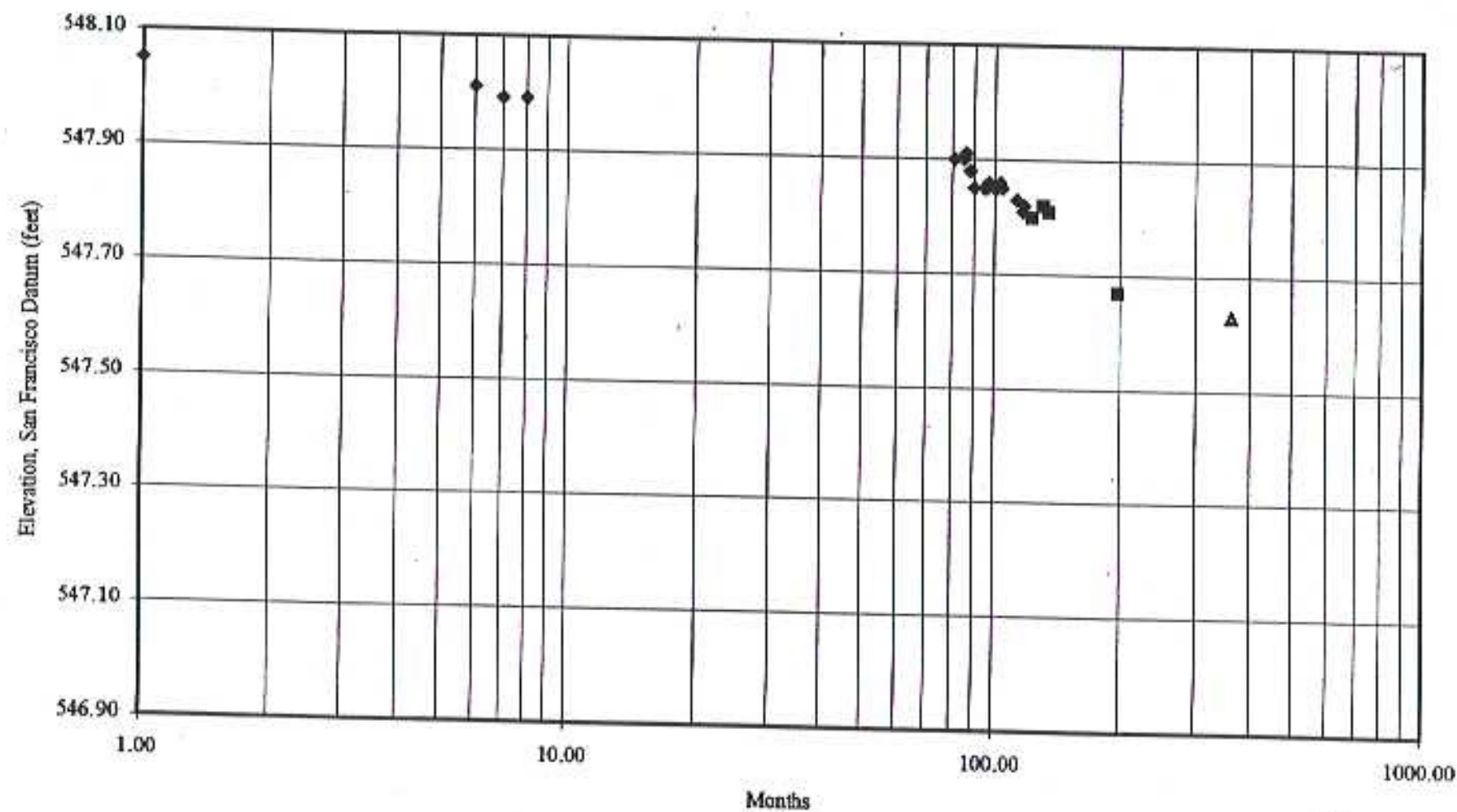
◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

*Reading is in vicinity of Point No. 27

Trans Pacific Geotechnical Consultants, Inc.

PLATE 6D

San Francisco Police Academy Floor Elevations Point No.61



◆ Readings by SFUSD ■ Readings by KCA Engineers ▲ Readings by Martin M. Ron Associates*

*Reading is in vicinity of Point No. 61

Trans Pacific Geotechnical Consultants, Inc.

PLATE 6E

DRAFT

APPENDIX I



Jocelyn Cohen
Poetree Landscapes & Arboriculture
132 Winfield St. • San Francisco • CA 94110

Rafael Mandelman,
President of the San Francisco Board of Supervisors
City Hall, San Francisco CA 94102
RE: Proposed ATT 104' MonoPole and Macro Tower at 350 Amber Dr. San Francisco

Dear Supervisor Mandelman,

October 24, 2025

The location of the proposed Monopole and Macro Tower is among a grove of tall trees described in the ATT project report. This 104 foot Monopole with large bulky heavy electronic equipment atop it, will be very heavy (estimate multiple tons) and will require digging to bedrock possibly between 30 and 90 feet to stabilize the structure. The great depth of digging or drilling is *not the only* concern for the trees, it is the disturbance to the surrounding landscape of the trees / around the trees which will be forever devastated in our lifetime and 100s of years beyond.

The tricky thing about root disturbance is the effects often do not show up for even a decade or more and by then people have forgotten what occurred and blame the tree's demise on some other reason for dying. Vibration of the structure from the high winds will also disturb the soil the roots rely on.

In addition, the eucalyptus trees in the canyon provide valuable nesting, breeding and roosting habitat for birds of prey which have some similar issues as for bats. Putting a cell tower in the midst of a significant habitat area for protected species is an irreversible mistake. Furthermore, millions of micro habitat from invertebrates and other irreplaceable soil biota have coevolved with the trees over for over 150 years and rely on this stability for survival.

Please consider the health and safety of the trees that are needed for wildlife, human health and safety AND the stability of the edge of Glen Canyon Park where this is proposed which is a documented landslide area.

Sincerely,

A handwritten signature in black ink that reads "Jocelyn Cohen". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Jocelyn Cohen
Certified Arborist
TRAQ – Tree Risk Assessor Qualification

APPENDIX J

SUSAN FOSTER
PO BOX 1444
LYONS, CO 80540

October 23, 2025

Dear President Rafael Mandelman and Honorable Supervisors:

Re: Conditional Use Permit and CEQA exemption appeals for ATT Macro Tower at 350 Amber Drive SF CA 94131

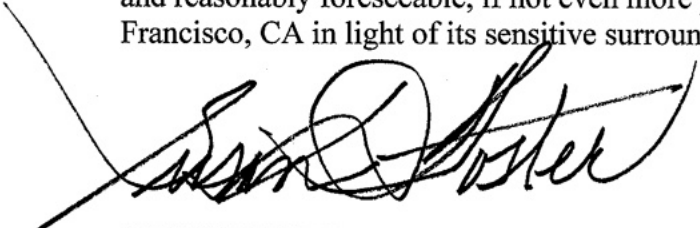
1) I, Susan Foster, am an Honorary Firefighter with the San Diego Fire Department. I have worked with firefighters in California and across the country for more than two decades. I worked with Tony Simmons, PE, a professional electrical engineer licensed in the states of Nevada and California, as well as attorney W. Scott McCollough. The three of us were hired to create a Fire Safety Protocol for telecommunications equipment in Malibu, California following two telecom equipment-initiated fires causing damages of over \$6 billion between the 2007 Malibu Canyon Fire and the 2018 Woolsey Fire.

2) I confirm that a wireless facility may cause electrical fires which are very difficult to extinguish using conventional means. Firefighters do not typically fight fires on energized electrical equipment with water because of the severe risk of electrocution. The grid must be cut first, a process that can take up to one hour. Firefighters can only stand by and protect the perimeter until a utility representative appears on scene to confirm the power has been cut.

2) I confirm that the 104' wireless facility proposed at 350 Amber Drive next to a grove of 90-foot eucalyptus trees, Glen Canyon Park, a children's playground, and other residential places, presents a significant fire hazard that would be extraordinarily challenging, if not impossible, to extinguish, and which may endanger life, safety, and destroy properties nearby.

3) I authored the November 17, 2022, LA County White Paper and co-authored the Malibu White Paper, February 16, 2022, with Tony Simmons, PE. I stand by and concur with opinions regarding the fire hazards caused by wireless facilities that are detailed in these papers.

4) I believe that the same fire risks and hazards described in the Malibu and LA County White Papers authored by myself and subject matter expert Tony Simmons, PE are equally applicable and reasonably foreseeable, if not even more probable, at the 350 Amber Dr. location in San Francisco, CA in light of its sensitive surroundings and the adjacent grove of eucalyptus trees.



SUSAN FOSTER
Honorary Firefighter SDFD

APPENDIX K

1. June 22, 2025

To: Planning Commission Chair Lydia So,

Vice Chair Kathrin Moore

Members: Derek Braun, Gilbert Williams, Amy Campbell, Theresa Imperial and Sean McGary

cc: commissions.secretary@sfgov.org

cc: recpark.commission@sfgov.org

From: SF Supervisor John Avalos (ret)

RE: Item 9a & b on June 26 Commission Agenda re: placing a telecommunications facility at 350 Amber

As a member of the SF Board of Supervisors in 2010 I introduced the Personal Wireless Service Facility Site Permits Ordinance requiring antenna applicants to consider the visual impact of any new installations citing the need “to regulate placement ... that will diminish the City’s beauty.” The city could reject applications based on that factor alone. The ordinance also required the city to notify neighbors of new installations. Neighbors would then have the opportunity to protest new antennas and force a hearing with the Department of Public Works. The hearing process has changed over the years to be the Planning Commission which is your role today.

The ordinance was challenged in court by T-Mobile, Crown Castle, and ExteNet Systems in 2016 and went through several courts finally ending up in the California State Supreme Court. On April 4, 2019, the California Supreme Court issued a unanimous decision upholding the First District Court of Appeal’s ruling that telecommunications facilities must comply with a municipal ordinance that enforces aesthetic guidelines.

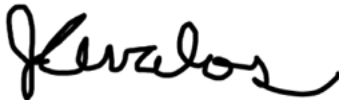
I am urging the Planning Commission to reject this 104 foot “monopole” structure with several large attachments that will be seen 20 feet above the tree line from neighbors based on the fact that it will dramatically change the aesthetic character of the neighborhood including Glen Canyon and Christopher Park. Glen Canyon is a unique area of San Francisco where the terrain provides for an experience of an unlandscaped natural environment. Users of the Canyon enjoy the views of trees as they hike up trails. Residents live above the Canyon and treasure the vistas, looking across it. Families and neighbors walking their dogs treasure the tree lined Christopher Park which will now have an electric structure that is the height of a 10 story building with a bulky Macro Wireless Telecommunications Services Facility apparatus with 12 new antennas and 9 remote radio units, 3 mounted with surge suppressors towering over the north east border of the park behind the Police Academy. This proposed facility will ruin the vistas for the public and the residents whether hiking up the canyon, watching little league in Christopher Park or looking out the window of the residents fortunate enough to call Diamond Heights neighborhoods overlooking the Canyon their home.

I also want to express my concern for the choice of this site based on safety. Diamond Heights is one of the windiest neighborhoods in San Francisco. The three Eucalyptus trees that are being used (referred to as a “grove” in the Executive Summary to “reduce the visual impact” of the monstrous proposed electric structure present a fire risk along with the 109 gallon diesel tank and generator.

(They will also not reduce the visual impact since the structure is larger than all of them together). In addition I am concerned that there will be signs posted with a warning "entering this area may have RF fields that may exceed FCC general population limits." That is unacceptable especially since the structure is only 10-20 feet away from Police Academy Class Rooms and less than 50 feet away from the Christopher park playground. There are many inaccurate statements including suggesting that the proposed Macro facility meets the Commission's guidelines on where facilities should be located.

I urge the Planning Commission to take seriously the importance of this proposal which will not only be an aesthetic blight in the neighborhood but also presents safety concerns as described. Thank you for your consideration.

Sincerely,



John Avalos
638 Paris St
San Francisco, CA 94112

**2. Subject: Support CEQA Exemption Appeal – AT&T Tower at 350 Amber Drive
(File No.251094)**

Dear President Mandelman,
Members of the San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors.

I write to express my strong support for the neighborhood appeal of the CEQA exemption granted for the proposed AT&T macro wireless facility at 350 Amber Drive, and to urge the Board of Supervisors to grant the appeal and require a full Environmental Impact Report (EIR).

As many of you know, I served on the San Francisco Board of Supervisors and, in 2010, authored the Personal Wireless Service Facility Site Permits Ordinance, which took effect on January 4, 2011. That ordinance codified San Francisco's authority to consider aesthetics, siting impacts, and neighborhood compatibility when regulating wireless facilities, and it ensured transparency and public participation. The California Supreme Court later upheld the City's authority in a unanimous decision.

Before addressing the CEQA issues, I want to note that this project should also have been subject to a Conditional Use (CU) appeal, but the community was denied that opportunity due to a flawed and inconsistent process. The Conditional Use appeal was rejected on the basis that neighbors had not met the signature threshold—but the map and contact list provided by Planning did not match the one used by DPW to verify the

signatures. When residents contested the rejected signatures, staff acknowledged that errors were made but were unable to explain how to correct the process or allow the appeal to proceed. This inconsistency has left many residents concerned that the process operated with bias toward project approval. There may still be a path to correct this, but at minimum it underscores why CEQA remains the only functioning avenue for meaningful oversight.

In this CEQA appeal, two key issues compel the Board to reject the exemption:
(1) the improper use of a Class 3 exemption for a major new facility, and
(2) the harmful precedent such an approval would set citywide.

1. The Class 3 Exemption Does Not Apply to This Project

CEQA's Class 3 exemption is limited to small structures and minor alterations of existing

facilities. The proposed project is neither. This is a new 104-foot, 10-story industrial monopole with a substantial antenna array, large foundation, and significant electrical and mechanical equipment, situated in an open-space parcel adjoining two major parks—Glen Canyon Park and George Christopher Park.

A project of this magnitude cannot be deemed “small” or “minor.” Moreover, CEQA prohibits the use of categorical exemptions where unusual circumstances exist and create a reasonable possibility of environmental impact. Several unusual circumstances apply here:

-

The site lies on or adjacent to deep artificial fill associated with known instability and past slope movement.

-

The location borders high-value parkland and wildlife habitat, serving as a natural corridor through Glen Canyon.

-

The tower would introduce a major industrial intrusion into one of San Francisco's most cherished natural landscapes.

Under the Berkeley Hillside decision, these conditions plainly require preparation of an EIR.

2. Approving This Exemption Would Set a Harmful Citywide Precedent

San Francisco has no free-standing wireless tower of comparable height in any residential or open-space district. The only two wireless facilities exceeding 100 feet are attached to buildings in commercial zones.

Approving this CEQA exemption would encourage telecommunications carriers to bypass full environmental review by claiming minor-project exemptions for major new towers. It would undermine decades of municipal policy and San Francisco's long-standing commitment to requiring “least intrusive means” siting.

This case arrives at a time when the Trump Administration is abandoning the entire federal regulatory framework in a race to the bottom explicitly aimed at weakening

public health, workplace safety, environmental standards and local authority. For that reason alone, San Francisco must avoid establishing a precedent that favors expedited installation of industrial infrastructure in residential and open-space neighborhoods without full environmental analysis.

The Board's decision here will not only determine the future of Diamond Heights and Miraloma Park—it will influence how telecommunications infrastructure is sited in every neighborhood in the city.

Conclusion

Given the project's scale, location, unusual circumstances, and precedent-setting implications, a full Environmental Impact Report is the only responsible path forward. CEQA is designed precisely for situations where significant environmental, visual, and land-use impacts are reasonably foreseeable.

For these reasons, I respectfully urge the Board of Supervisors to: **Approve the CEQA appeal, overturn the exemption, and require a full Environmental Impact Report—including a geotechnical analysis, alternatives evaluation, and review of potential citywide precedent.**

Should it come before you, I also urge you to disapprove or uphold any appeal of a conditional use permit for this project.

Thank you for your time, careful consideration, and commitment to protecting San Francisco's neighborhoods and open spaces.

Sincerely,
John Avalos
Excelsior District, San Francisco

3. John
Avalos <johnavalos11@gmail.com
>

Tue, Dec 2,
2025,
12:40 AM

to bos.legislation, Rafael, Angela, chanstaff, sherrillstaff, sauterstaff, wong.staff, mahmoodstaff, d
orseystaff, melgarstaff, FielderStaff, chenstaff, bcc: me

Subject: Support – File No. C251098
Conditional Use Authorization Appeal – 350 Amber Drive Project
Request: Uphold the CUA appeal and grant a continuance
Dear President Mandelman,
Members of the San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors

I am writing in strong support of the neighborhood appeal of the **Conditional Use Authorization (CUA)** for the proposed 104-foot AT&T macro tower at **350 Amber Drive**, and to request that the Board of Supervisors **grant a continuance** so that the community may adequately prepare its case. The project fails the core metrics required for Conditional Use approval. It is **not desirable, not necessary, not compatible with neighborhood character, and fundamentally inconsistent with the General Plan and the intent of the Open Space designation**. Aesthetic criteria—including those established by the City’s own Personal Wireless Service Facility Site Permits Ordinance—directly inform whether the project is desirable. And given the flawed and rushed process that preceded this hearing, a continuance is essential to ensure fairness.

1. Procedural Fairness Requires a Continuance

The community was blindsided by the sudden notice of this hearing. On November 18, after residents contested the Department of Public Works’ rejection of signatures on the Conditional Use appeal petition, DPW acknowledged that **they had miscounted signatures**. DPW and Planning used **different maps and different lists** to determine eligibility, leading to erroneous rejection of valid signatures.

Once the error was acknowledged, the Clerk sent out hearing notices with a **December 9 hearing date and a December 2 materials deadline**, spanning Thanksgiving week—giving volunteer residents almost no time to raise legal funds, prepare materials, or schedule meetings with Supervisors.

AT&T received **two continuances** at the Planning Commission. Residents now deserve the same basic fairness. A continuance is warranted to correct the inequities of the process and allow the community adequate time to prepare.

2. The Project Is Not Desirable as Required Under Planning Code §303

Conditional Use approval requires the project to be “**necessary or desirable for, and compatible with, the community**.” This project is none of these.

Aesthetics Are a Required Part of Desirability

In 2010, as a member of this Board, I authored the **Personal Wireless Service Facility Site Permits Ordinance**, which explicitly requires that wireless facilities be evaluated for *visual and aesthetic impact*—and authorizes the City to reject applications based on aesthetics alone. The California Supreme Court unanimously upheld this authority in 2019.

Desirability includes protecting:

- the **visual character** of the neighborhood
- the **natural landscape** and sky views of Glen Canyon and George Christopher Park
- the **planned open-space character** of Diamond Heights

No free-standing 100-foot wireless tower exists in any San Francisco residential neighborhood. Approving the first of its kind here is not desirable for the neighborhood, the city, or future planning precedent.

3. The Project Is Not Necessary

The project is not necessary to fulfill emergency response obligations or wireless coverage requirements.

- **FirstNet does not require this macro tower.** Signal enhancement equipment is available for indoor coverage at the Police Academy.
- Other carriers provide adequate service to the area through **smaller, less intrusive distributed antenna systems**—exactly the type used in other hilly neighborhoods.
- AT&T’s primary motivation appears to be **market expansion**, not public need.

Necessity must be based on actual service gaps—not corporate preference for large macro infrastructure placed on public land.

4. The Project Is Not Compatible with Neighborhood Character

The Conditional Use standard requires compatibility with:

- **the existing neighborhood,**
- **the General Plan,** and
- **the surrounding open-space environment.**

This project fails all three.

Neighborhood Character

Diamond Heights was developed in the 1950s–60s as a **purposefully planned community** by the Redevelopment Agency, with **undergrounded utilities** to preserve views of the trees and the sky. It is a neighborhood defined by open space, natural vistas, and adjacency to parks.

A 10-story industrial monopole—bulkier than anything in the surrounding area—directly contradicts these defining characteristics.

General Plan Consistency

The General Plan prioritizes:

- **protection of open space,**
- preservation of **natural vistas,**
- **compatibility of new development** with established neighborhoods, and
- minimizing **visual and environmental intrusions** into parks and habitat areas.

Placing the city’s tallest free-standing tower in an Open Space Zone directly at the edge of Glen Canyon violates these principles.

Open Space and Habitat Corridor

The site shares a tree canopy with both parks and sits at the entrance to one of San Francisco’s most ecologically rich natural areas. The tower constitutes a major industrial intrusion into a wildlife corridor used by birds and mammals. Industrial-scale lighting, heat, and electromagnetic emissions all create risks for birds—including collisions and attraction to warm antenna surfaces. This location is among the **least compatible** imaginable for this scale of infrastructure.

5. The Project Sets a Harmful Citywide Precedent

Approving a Conditional Use for such a structure in an open-space-adjacent residential area would:

- invite similar proposals in other neighborhoods
- undermine decades of wireless siting policy
- weaken the City’s ability to require “least intrusive means” siting
- support telecom industry efforts to erode local control

This is not only a Diamond Heights issue—it is a **citywide governance issue**.

Conclusion

For all of these reasons—failure to meet the thresholds of **desirability, necessity, compatibility, and General Plan consistency**, combined with a flawed process that denied residents fair participation—I respectfully urge the Board of Supervisors to:

1. Grant a continuance so that neighbors may fully prepare their case and receive the same procedural fairness afforded to the project sponsor.

When the actual CU appeal is heard

2. Approve the neighborhood's Conditional Use Authorization appeal for the project at 350 Amber Drive

Thank you for your consideration and for your commitment to protecting San Francisco's neighborhoods, natural areas, and civic process.

Sincerely,

John Avalos

Excelsior District, San Francisco



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