

PUBLIC HEARING

Agenda Item #2

**PLANNING COMMISSION
AGENDA REPORT**

Meeting Date: March 3, 2022

Subject: Wireless Telecommunications Facilities Ordinance and Design Guidelines

Prepared by: Gabriel Engeland, City Manager

Attachments:

- A. Resolution 2022-___, Wireless Telecommunications Facilities CEQA Resolution
- B. Ordinance 2022-___, Wireless Telecommunications Facilities Locational Standards
- C. Resolution 2022-___, Wireless Telecommunications Facilities Design Guidelines
- D. Public Correspondences

Initiated by:

City Council

Recommendation:

Approve proposed Ordinance 2022-___ and Resolution 2022-___.

Environmental Review:

An Initial Study was prepared to evaluate physical environmental impacts associated with the proposed update of the City's standards addressing wireless telecommunications facilities, including (1) locational requirements and preferences, and (2) development standards and design guidelines pursuant to State CEQA Guidelines Section 15063. The Initial Study determined that impacts for each of environmental issues that were analyzed would be less than significant or that no impact would occur.

An Initial Study/Proposed Negative Declaration was distributed for a 30-day public review on January 26, 2022 and closed on February 25, 2022. Comments received by the City during this review period are included in Attachment 3 along with responses to physical environmental issues raised in these comments.

There is no substantial evidence, in light of the whole record before the lead agency (the City of Los Altos), that the project may have a significant effect on the environment. Approval of a Negative Declaration by the City Council is therefore appropriate.



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Summary:

Proposed revisions to the City of Los Altos' existing standards for placement and development of wireless telecommunications facilities include a proposed ordinance regulating the permissible locations and preferences for the location of wireless facilities within Los Altos. These locational standards, which would replace the locational standards now provided in City of Los Altos Resolution No. 2019-35, would be adopted by ordinance into Chapter 11.82 of the Los Altos Municipal Code. The proposed locational standards would expand locations where small wireless telecommunications could be permitted within the City by allowing such facilities to be located within rights-of-way of expressways, arterials, collectors, along with local collectors regardless of the zoning districts of adjacent lands. In addition, small wireless facilities are also proposed to be permitted within the rights-of-way of local residential streets within 200 to 500 feet of expressways, arterials, collectors, local collectors when other more preferred locations are simply infeasible. Currently, small wireless telecommunications facilities are limited to rights-of-way of roadways adjacent to non-residentially zoned lands.

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

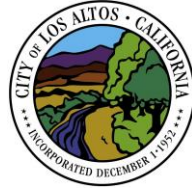
Background:

1. Existing Standards for Development of Wireless Telecommunications Facilities

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

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

The City adopted Resolution No. 2019-35 and Municipal Code Chapter 11.12 in August 2019. This occurred after the City held a study session and several public hearings, at which stakeholders discussed wireless and other infrastructure deployment issues; reviewed potential local regulatory responses to the recent changes in federal law in the FCC orders; and expressed their design and location preferences, practical and safety concerns, aesthetic concerns, policy views and the essential local values that make Los Altos a uniquely small suburban community. In the summer of 2019, Los Altos residents identified numerous concerns with the aesthetic impacts of wireless



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telecommunications facilities focusing on the visual intrusiveness of wireless facilities and their adverse effects on the community, such as:

- Cell towers and small cell facilities are unsightly, noisy and add to the visual intrusiveness of existing above-ground electric and telephone lines.
- Small cell nodes previously proposed by to the City of Los Altos carriers such as AT&T and Verizon, have been visually intrusive and unsightly;
- The City should continue to be judicious about wireless facilities and recognize the need to eliminate visual blight; mitigate noise and heat impacts; and protect residents’ enjoyment of their properties and their market value;
- Cell towers should be placed in commercial areas and within the medians of major streets rather than within residential neighborhoods close to people’s homes; and
- Los Altos neighborhood aesthetic guidelines and property values are among the main reasons people are willing to stay in this great City.

2. Purpose of Updated Development Standards and Design Guidelines for Wireless Telecommunications Facilities

The overarching intent of the proposed Ordinance and Design Guidelines is to make wireless telecommunications reasonably available while preserving the essential rural character of Los Altos. The proposed Ordinance and Design Guidelines achieve this intent by minimizing the visual and physical effects of wireless telecommunications facilities through appropriate location, siting, design, and visual screening of facilities; encouraging the installation of wireless telecommunications facilities at locations where other such facilities already exist; and providing for the installation of such facilities so as to minimize potential adverse impacts to Los Altos.

Discussion/Analysis:

1. Proposed Revisions to Municipal Code Chapter 11.2, Wireless Facilities

The City’s current locational criteria restrict wireless telecommunications facilities to non-residential zoning districts which is illustrated in Figure 1. To ensure that adequate cellular coverage can be provided to Los Altos residents and businesses, Municipal Code Section 11.12.090 provides for exceptions from the City’s locational and development to be granted. Specifically, Section 11.12.090 A permits the City to grant “exceptions from findings that would otherwise justify denial” and approve a wireless telecommunications facility permit if the City finds:

- 1) Denial of the facility as proposed would violate federal law, state law, or both; or



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- 2) A provision of this chapter, as applied to applicant, would deprive applicant of its rights under federal law, state law, or both.

For example, should a carrier demonstrate, and the City concur, that one or more wireless telecommunications facilities are needed at locations not otherwise be permitted by the City's current locational standards, permits for such facilities could be approved to eliminate a significant gap in coverage. Section 11.12.090 B states that an applicant may only request an exception at the time as part of an application for wireless telecommunications facility permit.¹

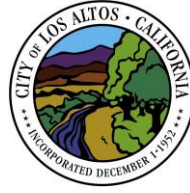
The proposed ordinance deletes Code Section 11.12.090 in its entirety and instead, provides for a comprehensive rather than site-by-site approach for ensuring adequate cellular coverage can be provided to Los Altos residents and businesses. The exception process has the possibility of being used to subsume the City's land use locational provisions and to encourage litigation by the carriers. Accordingly, the proposed ordinance deletes this exception provision.

The proposed ordinance would allow wireless facilities to locate in locations not otherwise permitted when certain set criteria have been satisfied. Specifically, the proposed ordinance (Section 14.82.050) requires carriers to first demonstrate that a combination of (1) new wireless facilities, (2) relocation of the carrier's existing facilities, and (3) colocation with other carriers' existing facilities in locations meeting the City's proposed locational standards could not feasibly be deployed to avoid a significant gap in coverage. The burden of proof for such demonstration is placed upon the applicant. In addition, should an applicant provide such demonstration, proposed Section 14.82.050 requires the City to hire an independent consultant at the applicant's expense to evaluate the applicant's current network configuration and the applicant's demonstration of need for a facility or facilities not otherwise meeting the locational requirements of the proposed ordinance. Proposed Section 14.82.050 also provides the City a foundation to address future facility deployments as technologies and (more importantly) equipment changes and carriers introduce newer, better, smaller boxes and antennas that may have different locational requirements than do existing technologies and equipment.

2. Proposed Revisions to Locational Standards for Wireless Telecommunications Facilities

Proposed revisions to permitted locations for wireless telecommunications facilities are summarized in Table A, below.

¹ Any request for an exception after the city has deemed an application complete is treated as a new application.



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Table A: Existing and Proposed Permitted Locations for Wireless Telecommunications Facilities

Existing Permitted Locations	Proposed Permitted Locations
Permitted Locations for Wireless Telecommunications Facilities on Properties Outside of Roadway Rights-of-Way and Public Easements	
<p>Wireless telecommunications facilities are currently permitted within non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010.</p> <ul style="list-style-type: none"> K. Office-Administrative (OA); L. Office-Administrative (OA-1 and OA-4.5); N. Commercial Neighborhood (CN); O. Commercial Downtown (CD); P. Commercial Retail Sales (CRS); Q. Commercial Thoroughfare (CT); R. Commercial Retail Sales/Office (CRS/OAD); S. Public and Community Facilities (PCF); and V. Loyola Corners Specific Plan Overlay (LCSPZ). <p>Wireless telecommunications facilities are also permitted within the mixed-use zoning district identified in the following subsection of Municipal Code Section 14.04.010 provided they are no closer than 500 feet from any residential dwelling unit.</p> <ul style="list-style-type: none"> M. Commercial Downtown/Multiple Family (CD/R-3) 	<p>Wireless telecommunications facilities will continue to be permitted within non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010.</p> <ul style="list-style-type: none"> K. Office-Administrative (OA); L. Office-Administrative (OA-1 and OA-4.5); N. Commercial Neighborhood (CN); O. Commercial Downtown (CD); P. Commercial Retail Sales (CRS); Q. Commercial Thoroughfare (CT); R. Commercial Retail Sales/Office (CRS/OAD); S. Public and Community Facilities (PCF); and V. Loyola Corners Specific Plan Overlay (LCSPZ). <p>Wireless telecommunications facilities are proposed to no longer be permitted within the permitted within the CD/R-3 zoning district.</p>



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Permitted Locations for Wireless Telecommunications Facilities Within Roadway Rights-of-Way and Public Easements	
Existing Permitted Locations	Proposed Permitted Locations
<p>Only small wireless telecommunications facilities are currently permitted within public rights-of-way and easements.</p> <p>Small wireless telecommunications facilities are currently permitted adjacent to non-residential zoning districts identified in the following subsections of Municipal Code Section 14.04.010.</p> <p>K. Office-Administrative (OA);</p> <p>L. Office-Administrative (OA-1 and OA-4.5);</p> <p>N. Commercial Neighborhood (CN);</p> <p>O. Commercial Downtown (CD);</p> <p>P. Commercial Retail Sales (CRS);</p> <p>Q. Commercial Thoroughfare (CT);</p> <p>R. Commercial Retail Sales/Office (CRS/OAD);</p> <p>S. Public and Community Facilities (PCF); and</p> <p>V. Loyola Corners Specific Plan Overlay (LCSPZ).</p> <p>Wireless telecommunications facilities are also permitted within public rights-of-way and easements adjacent to the mixed-use zoning district identified in the following subsection of Municipal Code Section 14.04.010 provided they are no closer than 500 feet from any residential dwelling unit.</p> <p>M. Commercial Downtown/Multiple Family (CD/R-3)</p>	<p>Only small wireless telecommunications facilities are currently permitted within public rights-of-way and easements.</p> <p>Small wireless telecommunications facilities are proposed to be permitted within the following roadway types regardless of the zoning districts of adjacent lands:</p> <ul style="list-style-type: none"> • Expressways • Arterials • Collectors • Local Collectors <p>Wireless telecommunications facilities are also proposed to be permitted within public rights-of-way of local streets that are:</p> <ul style="list-style-type: none"> • Adjacent to zoning districts permitting wireless telecommunications facilities on private property <ul style="list-style-type: none"> ○ Local non-residential streets (Municipal Code Sections 14.04.010 K-L, N-S, V) ○ Local residential streets (Municipal Code Sections 14.04.010 A-J, M, U, W), provided they are located within: <ul style="list-style-type: none"> ▪ 200 feet of the Foothill Expressway right-of-way; ▪ 500 feet of the San Antonio Avenue, El Monte Drive, Magdalena Avenue, or Homestead Road right-of-way; or ▪ 300 feet of a Collector or Local Collector right-of-way.
<p>Wireless telecommunications facilities are currently permitted within public easements adjacent to non-residential zoning districts</p>	<p>No changes in the permitted location of telecommunications facilities are currently</p>



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permitting wireless telecommunications facilities,	permitted within public easements are proposed.
Other Locational Standards for Wireless Telecommunications Facilities	
Small wireless telecommunications facilities are required to be located no closer than 1,500 feet from any other small wireless telecommunications facility.	Small wireless telecommunications facilities are required to be located no closer than 1,000 feet from any other small wireless telecommunications facility.
Wireless telecommunications facilities are currently prohibited within 500 feet of a school within the Public Facilities District (Municipal Code §14.04.010 S).	The required setback for wireless telecommunications facilities is proposed to be removed.

As well, permitted locations for wireless telecommunications facilities are illustrated in Figure 1 (Existing Permitted Locations) and Figure 2 (Proposed Permitted Locations).

In considering proposed locational standards, note that there are three levels of preferences:

1. Preferred: non-residential locations (sites consistent with existing standards);
2. Less preferred locations provided that demonstration is made that a preferred location would not provide coverage:
 - Local non-residential streets (Municipal Code Sections 14.04.010 K-L, N-S, V)
 - Local residential streets (Municipal Code Sections 14.04.010 A-J, M, U, W), provided they are located within:
 - 200 feet of the Foothill Expressway right-of-way;
 - 500 feet of the San Antonio Avenue, El Monte Drive, Magdalena Avenue, or Homestead Road right-of-way;
 - 300 feet of a Collector or Local Collector right-of-way.
3. Rights-of-way of a local residential street that is neither a preferred nor a less preferred location only if:
 - A combination of macro and small wireless telecommunications facilities, as well as colocation with existing facilities of other carriers at preferred and less preferred locations within the City would not provide adequate coverage; and
 - The total number of wireless telecommunications facilities within Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) would be minimized.



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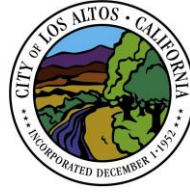
Recommending that the City Council approve only the first level of preferred locations would effectively retain existing locational standards. The Planning Commission may also consider recommending that the City Council adopt locational standards that include the less preferred locations (#2, above), the other locations identified in #3, above, or both the locations identified in #2 and #3, above.

2. Changes to the Number and Linear Footage of Permitted Locations for Wireless Telecommunications Facilities Resulting from Proposed Revisions to Locational Standards

Proposed locational standards contained in Ordinance 2022-__ would increase the linear footage of roadway rights-of-way where small wireless telecommunications facilities could be permitted by allowing such facilities in specific locations adjacent to residential zoning districts as described above in Table A and by also reducing the required separation between small wireless telecommunications facilities from 1,500 feet to 1,000 feet.

An analysis was undertaken to determine the additional linear footage of roadway rights-of-way and number of parcels where wireless telecommunications facilities could be located within the City based on the proposed locational standards contained in Ordinance 2022-__. The analysis determined that permitting small wireless telecommunications facilities along expressways, arterials, collectors, and local collectors regardless of the zoning of adjacent lands, would increase the linear footage where small facilities within City of Los Altos rights-of-way as follows:

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



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○ Miramonte Avenue	+3,705 linear feet
○ Fremont Avenue	+5,590 linear feet
● Local Collectors	
○ Los Altos Avenue	+6,585 linear feet
○ Covington Road	+7,400 linear feet
○ Loyola Drive	+2,205 linear feet
○ St. Joseph Avenue	+920 linear feet
● Local Residential Streets adjacent to Expressways, Arterials, Collectors, and Local Collectors	+ 65,840 linear feet

Table B summarizes changes in the linear feet of right-of-way and number of parcels within the City where wireless telecommunications facilities would be permitted.

Table B: Number of Properties and Linear Feet of Roadway Right-of-Way Permitting Wireless Telecommunications Facilities

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

Source: Metis Environmental Group, 2021.

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

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



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telecommunications facilities in the City. By drawing 1,000-foot radii along rights-of-way permitting small wireless telecommunications facilities beginning at the City’s western boundary along El Camino Real, it was determined that a maximum of approximately 65 such facilities could be located within the City in compliance with proposed locational standards, including the requirement to maintain a 1,000-foot separation between small telecommunications facilities.

3. Proposed Revisions to Preferences for the Location of Wireless Telecommunications Facilities

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

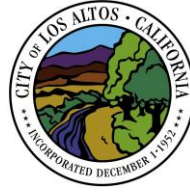
Table C: Existing and Proposed Permitted Locational Preferences for Wireless Telecommunications Facilities

Existing Locational Preferences	Proposed Locational Preferences
Locational Preferences for Wireless Telecommunications Facilities on Properties Outside of Roadway Rights-of-Way and Public Easements	
<p>The order of preference for the location of wireless telecommunications facilities from most preferred to least preferred is:</p> <ol style="list-style-type: none"> 1. Commercial Districts (Office-Administrative [OA, OS-1, OA-4.5], Commercial [CD, CRS, CT, CRS/OAD] and the Loyola Corners Specific Plan 2. Public Facilities District (PCF) 	<p>The preferred locations for wireless telecommunications facilities include properties within non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, N-S, V)</p> <p>Less preferred locations for wireless telecommunications facilities include any City-owned property and properties within one of the following Zoning Districts identified in the following subsections of Municipal Code Section 14.04.010.</p> <p>N. Commercial Neighborhood District (CN); and S. Public and Community Facilities District (PCF). T. Public and Community Facilities/Single-Family District (PCF/R1-10)</p>



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Existing Locational Preferences	Proposed Locational Preferences
Locational Preferences for Wireless Telecommunications Facilities within Roadway Rights-of-Way and Public Easements	
<p>The order of preference for the location of wireless telecommunications facilities from most preferred to least preferred is:</p> <ol style="list-style-type: none">1. Commercial Districts (Office-Administrative [OA, OS-1, OA-4.5], Commercial [CD, CRS, CT, CRS/OAD] and the Loyola Corners Specific Plan2. Public Facilities District (PCF)	<p>Preferred location for wireless telecommunications facility within a public right-of-way or public utility easement include rights-of-way for:</p> <ul style="list-style-type: none">• Expressways, Arterials, and Collectors fronting non-Residential Zoning Districts (Municipal Code Sections 14.04.010 K-L, N-S, V)• Collectors fronting the Public and Community Facilities District (PCF) (Municipal Code Section 14.04.010 S). <p>Less preferred location for wireless telecommunications facility within a public right-of-way or public utility easement include the following rights-of-way and easements:</p> <ul style="list-style-type: none">• Local Collectors fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V)• Public utility easements fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V)• Local streets fronting non-Residential Zoning Districts (Municipal Code Sections Municipal Code Sections 14.04.010 K-L, N-S, V)• Expressways, Arterials, and Collectors fronting Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) <p>To avoid concentration of facilities along any one street within the City, small wireless telecommunications facilities may also be located within the rights-of-way for local streets fronting Residential Zoning Districts (Municipal</p>



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Existing Locational Preferences	Proposed Locational Preferences
	<p>Code Sections 14.04.010 A-J, M, U, W) where the facility would be within:</p> <ul style="list-style-type: none"> • 200 feet of the Foothill Expressway right-of-way • 500 feet of the San Antonio Avenue, El monte Drive, Magdalena Avenue, or Homestead Road right-of-way; or • 300 feet of a Collector or Local Collector right-of-way.
Requirements for Approval of Less Preferred Locations	
<p>None.</p>	<p>As proposed, applications that involve less-preferred locations may be approved only if:</p> <ol style="list-style-type: none"> 1. No preferred location exists within 500 feet from the proposed site; or 2. Any preferred location within 500 feet from the proposed site would be technically infeasible. <p>The burden of proof for demonstrating that either of these two conditions exists is on the applicant and must be satisfied with clear and convincing evidence.</p> <p>Applications that involve a less-preferred location are proposed to be required to be accompanied by clear and convincing written evidence demonstrating the need for approval of the proposed location rather than a more preferred location.</p> <p>The proposed ordinance specifically grants the City authority to hire an independent consultant at the applicant’s expense to evaluate the need for the proposed less-preferred location.</p>
Provisions for Approval of a Wireless Telecommunications Facility when no Permitted (Preferred or Less Preferred) Site could Provide Adequate Coverage	
<p>Municipal Code Section 11.12.090 permits exceptions to wireless telecommunications standards, including, but not limited to,</p>	<p>The proposed ordinance deletes the exception provisions contained in Municipal Code Section 11.12.090.</p>



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Existing Locational Preferences	Proposed Locational Preferences
<p>exceptions from findings that would otherwise justify denial, if the city makes the finding that:</p> <ol style="list-style-type: none">1. Denial of the facility as proposed would violate federal law, state law, or both; or2. A provision of this chapter, as applied to applicant, would deprive applicant of its rights under federal law, state law, or both. <p>The burden for proving that denial of the facility as proposed would violate federal law, state law, or would deprive applicant of its rights under federal law, state law, or both, using the evidentiary standards required by that law at issue, rests with the applicant.</p> <p>This section of the Municipal Code explicitly permits the city to hire an independent consultant, at the applicant’s expense, to evaluate the issues raised by the exception request and submit rebuttal evidence to refute the applicant’s claim.</p>	<p>The proposed ordinance also includes a provision that would allow for approval of a small wireless telecommunications facility within the right-of-way of a local residential street that is neither a preferred nor a less preferred location if:</p> <ol style="list-style-type: none">1. A combination of macro and small wireless telecommunications facilities, as well as colocation with existing facilities of other carriers at preferred and less preferred locations within the City would not provide adequate coverage; and2. The total number of wireless telecommunications facilities within Residential Zoning Districts (Municipal Code Sections 14.04.010 A-J, M, U, W) would be minimized.

4. Proposed Revisions to Guidelines and Preferences for the Design of Wireless Telecommunications Facilities

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

Basic Design Principles. Proposed design guidelines add three basic design principles—impact minimization, integration and concealment, and context—to ensure wireless telecommunications facilities within the City are designed and maintained so as to minimize visual, noise, and other impacts on the surrounding community.

The first principle, **impact minimization**, requires the overall impacts of a wireless telecommunications facility are to be minimized in relation to aesthetic, land use, noise, traffic, and other considerations. Although this is generally accomplished with the smallest feasible design



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for any given facility, this principle and subsequent design guidelines recognize that a larger facility may sometimes be appropriate if it is well concealed, compatible with the surrounding neighborhood, and can reduce the overall number of wireless telecommunications facilities required to provide service within the City.

The second principle, **integration and concealment**, provides for new wireless telecommunications facilities and modifications to existing facilities to be visually integrated into their sites and as hidden from view as feasible. Whereas existing preferences for the configuration of wireless telecommunications facilities list various types of configurations in order of preference,² the principle of integration and concealment specifies that non-integrated (unconcealed) installations are less preferred and permitted only where an integrated (concealed) facility is either infeasible or would reduce the number and overall visual intrusiveness of wireless telecommunications facilities required to provide service within the City.

The third principle, **context**, recognizes that specific situations require specific design solutions and that what may integrate well and conceal a wireless telecommunications facility at one location might not be appropriate for another situation at a different site. Overall, a wireless telecommunications facility that introduces a feature that changes the visual character of a site—such as by increasing the height of an onsite structure or introducing a tree species that is not otherwise present—is generally more visually intrusive than a facility that maintains the site’s character, even if the facility is itself concealed from public view.

5. *Design Guidelines Applying to all Wireless Telecommunications Facilities.* Proposed design guidelines applying to all wireless facilities within Los Altos expand upon the City’s existing guidelines by adding provisions to require:

- Wireless telecommunications facility design to be consistent with the existing and/or proposed landscape design of the adjacent site, using a similar or complementary plant palette.

² The City’s current design standards for wireless telecommunication facilities contained in Resolution No. 2019-35 identify the following order of preference for the configuration of wireless facilities from most preferred to least preferred:

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



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

7. Design Guidelines for Wireless Telecommunications Facilities on Properties Outside Public Rights-of-Way and Utility Easements. Proposed design guidelines for wireless telecommunications facilities on properties outside of public rights-of-way and utility easements identify specific preferred and less preferred configurations for building-, and roof-, and pole-mounted facilities along with specific design guidelines and illustrative examples for the following types of installations.

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



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- Architecturally Designed Stand-Alone Towers. Towers that are designed to appear as buildings or signs, and that conceal antennas completely within them, may be permitted where appropriate to the site on which they are proposed. Examples include, but are not limited to, clock towers and obelisks.
- Athletic Field Lights. These include wireless telecommunications facilities that are integrated with lighting used to illuminate large areas for the purposes of recreation.
- Other Permitted but Less Preferred Designs
 - Façade-Mounted Antennas. Façade-mounted antennas are any antennas mounted on the exterior of a building that are not faux architectural elements.
 - Faux Trees. Wireless telecommunications facilities may be designed to emulate trees where trees similar in size and species are present. Faux trees may also be appropriate when natural trees of similar species are planted concurrent with faux tree installation, depending on the density and size of trees being planted.
 - Pole-Mounted Telecommunications Facilities. Existing guidelines for facilities mounted to a telecommunications tower on properties outside or public rights-of-way and utility easements, including, but not limited to, attached antennas, are retained in the proposed design guidelines.

8. Design Guidelines for Wireless Telecommunications Facilities Proposed within Public Rights-of-Way and Utility Easements. Proposed design guidelines for wireless telecommunications facilities within public rights-of-way and utility easements identify specific preferred and less preferred configurations for pole-mounted facilities along with specific design guidelines and illustrative examples for the following types of installations.

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

9. Requirements for Approval of Less-Preferred Configurations. Proposed design guidelines add the requirements for applications that involve less-preferred configurations. Such applications may be approved only if the applicant demonstrates that:

- No preferred configuration would be technically feasible; or



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

Proposed design guidelines place the burden of proof upon the applicant to demonstrate that one of these two conditions exists and requires that applications for a less-preferred configuration be accompanied by clear and convincing written presentation of evidence demonstrating the need for approval of the proposed configuration rather than a preferred configuration. The proposed design guidelines also authorize the City to retain an independent consultant at the applicant's expense to evaluate the applicant's demonstration of need for the proposed less-preferred configuration.