CASE#: UM_2020-0002  
DATE FILED: 3/16/2020  
OWNER: BERIT CATTOLICO & PETER BOYSEN  
APPLICANT/AGENT: AT&T C/O J5 INFRASTRUCTURE PARTNERS  
REQUEST: Modification to Use Permit of existing communications facility to remove and replace three (3) antennas, install six (6) new Remote Radio Units (RRUs) and additional ancillary equipment to the tower and within the existing equipment shelter.  
LOCATION: In the Coastal Zone, 3± miles southeast of the City of Point Arena on the west side of Ten Mile Road (CR 506), 1± mile south of its intersection with Eureka Hill Road (CR 505), located at 25470 Ten Mile Rd., Point Arena (APN: 027-306-13).  
ENVIRONMENTAL DETERMINATION: Categorically Exempt  
SUPERVISORIAL DISTRICT: 5  
STAFF PLANNER: CHEVON HOLMES  
RESPONSE DUE DATE: April 27, 2020  
PROJECT INFORMATION CAN BE FOUND AT:  
https://www.mendocinocounty.org/government/planning-building-services/public-agency-referrals

Mendocino County Planning & Building Services is soliciting your input, which will be used in staff analysis and forwarded to the appropriate public hearing. You are invited to comment on any aspect of the proposed project(s). Please convey any requirements or conditions your agency requires for project compliance to the project coordinator at the above address, or submit your comments by email to pbs@mendocinocounty.org. Please note the case number and name of the project coordinator with all correspondence to this department.

We have reviewed the above application and recommend the following (please check one):

☐ No comment at this time.
☐ Recommend conditional approval (attached).
☐ Applicant to submit additional information (attach items needed, or contact the applicant directly, copying Planning and Building Services in any correspondence you may have with the applicant)
☐ Recommend denial (Attach reasons for recommending denial).
☐ Recommend preparation of an Environmental Impact Report (attach reasons why an EIR should be required).
☐ Other comments (attach as necessary).

_________________________________________  ______________________________________  ____________________________
Signature  Department  Date

REVIEWED BY:

BRENT SCHULTZ, DIRECTOR  
TELEPHONE: 707-234-6650  
FAX: 707-463-5709  
FB PHONE: 707-964-5379  
FB FAX: 707-961-2427  
pbs@mendocinocounty.org  
www.mendocinocounty.org/pbs
CASE: UM_2020-0002

OWNER: BERIT BOYSEN CATTOLICO

APPLICANT: AT&T MOBILITY

AGENT: LEAH HERNIKL OF J5 INFRASTRUCTURE PARTNERS

REQUEST: Modification to Use Permit of existing communications facility to remove and replace three (3) antennas, install six (6) new Remote Radio Units (RRUs) and additional ancillary equipment to the tower and within the existing equipment shelter.

LOCATION: In the Coastal Zone, 3± miles southeast of the City of Point Arena on the west side of Ten Mile Road (CR 506), 1± mile south of its intersection with Eureka Hill Road (CR 505), located at 25470 Ten Mile Rd., Point Arena (APN: 027-306-13).

PARCEL SIZE: 10,500 Square Feet of 76.84 ± Acre Parcel

GENERAL PLAN: Remote Residential 20 Acre Minimum (RMR20)

ZONING: Remote Residential 20 Acre Minimum (RMR-20)

EXISTING USES: Telecommunications/Residential

SUPERVISORIAL DISTRICT: 5th (Williams)

RELATED CASES:
Use permit U 46-87 was approved by the Planning Commission on December 17, 1987 and allowed Wander Telecommunications to construct a 100 foot tall microwave communication tower.

Use Permit U 45-90 was approved by the Planning Commission on February 21, 1991 and allowed MCI Telecommunications Corporation to erect a 140 foot tall tower on the subject parcel as a point-to-point microwave repeater to connect a Trans-Pacific fiber optic cable to the MCI network in Sacramento.

Coastal Development Use Permit CDU 21-2005 was approved July 20, 2006 legitimizing the existing tower as well as add twelve panel antennas.

Coastal Development Use Permit Modification CDUM 21-2005/2008 allowed for the addition of one microwave dish, a 10 X 16 foot equipment shelter, 25 kilowatt generator and a 500 gallon fuel tank.

Coastal Development Use Permit Modification CDUM 21-2005/2009 was approved and allowed for an addition of three panel antennas, a battery backup power system, GPS antenna and four equipment cabinets.

Coastal Development Use Permit Modification CDUM 21-2005/2011 was approved and allowed for addition of two antennas and placement of radio equipment within an existing cabinet.

Administrative Permit AP_2015-0001 allowed for replacement of six Tower Mounted Amplifiers (TMA) and adding three, eight-foot tall panel antennas.

<table>
<thead>
<tr>
<th>NORTH:</th>
<th>ADJACENT GENERAL PLAN</th>
<th>ADJACENT ZONING</th>
<th>ADJACENT LOT SIZES</th>
<th>ADJACENT USES</th>
</tr>
</thead>
<tbody>
<tr>
<td>EAST:</td>
<td>Forestland (FL160)</td>
<td>Timberland Production (T-P)</td>
<td>+/-77.05 Acres</td>
<td>Residential</td>
</tr>
<tr>
<td>SOUTH:</td>
<td>Remote Residential (RMR20)</td>
<td>Remote Residential (RMR:20) &amp; Remote Residential (RMR:20)</td>
<td>+/-79.1 Acres</td>
<td>Residential/Vacant</td>
</tr>
<tr>
<td>WEST:</td>
<td>Remote Residential (RMR20)</td>
<td>Rural Residential (RR:10)</td>
<td>+/- 20.01, 20.03, 20.0, 35.7 A</td>
<td>Vacant/Residential</td>
</tr>
</tbody>
</table>

WEST: Rural Residential (RR:10)

REFERRAL AGENCIES

LOCAL
- Building Division (Fort Bragg)
- Redwood Coast Fire Protection District
- Planning Division (Fort Bragg)
- Office of Emergency Services (OES)

STATE
- California Coastal Commission

TRIBAL
- Cloverdale Rancheria
- Manchester Rancheria
- Redwood Valley Rancheria
- Sherwood Valley Band of Pomo Indians
ADDITIONAL INFORMATION: The request for Use Permit Modification UM_2020-0002 is an eligible facilities request for modifications to an existing Wireless Telecommunications Facility (WCF) within the Coastal Zone. All requested modifications are to be conducted within the footprint of the existing facility. Additional information regarding proposed modifications are also found in the included 'Eligible Facilities Request' and 'Substantial Change Worksheet' within the referral packet.

The following project description represents the full scope of proposed work as submitted by the applicant:

---

**PROJECT DESCRIPTION**

- New antenna to be installed and replaced with (1) new antenna
- New 9001-4001 to be installed
- New 4000-5000 to be installed
- New single suspension with (1) 5000 1/4" and (2) 1/2" power tower to be installed
- New 240-240 to be installed with (1) new model 30-10
- New 110-110 to be removed and replaced with (1) 100 600
- New 40-40 to be installed in (3) power plant
- New 40 1/4 to be installed in (2) power plant

STAFF PLANNER: CHEVON HOLMES  
DATE: 4/7/2020
# ENVIRONMENTAL DATA

| 1. MAC: | GIS | N/A |
| 2. FIRE HAZARD SEVERITY ZONE: | CALFIRE FRAP maps/GIS | Very High Fire Hazard |
| 3. FIRE RESPONSIBILITY AREA: | CALFIRE FRAP maps/GIS | State Responsibility Area |
| 4. FARM LAND CLASSIFICATION: | GIS | Grazing Land (G) |
| 5. FLOOD ZONE CLASSIFICATION: | FEMA Flood Insurance Rate Maps (FIRM) | NO |
| 6. COASTAL GROUNDWATER RESOURCE AREA: | Coastal Groundwater Study/GIS | Critical Water Resources Bedrock |
| 7. SOIL CLASSIFICATION: | Mendocino County Soils Study Eastern/Western Part | Western Soils Type 142 |
| 8. PYGMY VEGETATION OR PYGMY CAPABLE SOIL: | LCP Land Use maps/GIS | Mendocino Cypress |
| 9. WILLIAMSON ACT CONTRACT: | Mendocino County Assessment Office | NO |
| 10. TIMBER PRODUCTION ZONE: | GIS | NO |
| 11. WETLANDS CLASSIFICATION: | GIS | N/A |
| 12. EARTHQUAKE FAULT ZONE: | Earthquake Fault Zone Maps; GIS | NO |
| 13. AIRPORT LAND USE PLANNING AREA: | Airport Land Use Plan; GIS | NO |
| 14. SUPERFUND/BROWNFIELD/HAZMAT SITE: | GIS; General Plan 3-11 | NO |
| 15. NATURAL DIVERSITY DATABASE: | CA Dept. of Fish & Wildlife Rare Find Database/GIS | NO |
| 16. STATE FOREST/PARK/RECREATION AREA ADJACENT: | GIS; General Plan 3-10 | NO |
| 17. LANDSLIDE HAZARD: | Hazards and Landslides Map; GIS; Policy RM-61; General Plan 4-44 | NO |
| 18. WATER EFFICIENT LANDSCAPE REQUIRED: | Policy RM-7; General Plan 4-34 | NO |
| 19. WILD AND SCENIC RIVER: | www.rivers.gov (Eel Only); GIS | NO |
| 20. SPECIFIC PLAN/SPECIAL PLAN AREA: | Various Adopted Specific Plan Areas; GIS | NO |
| 21. STATE CLEARINGHOUSE REQUIRED: | Policy | NO |
| 22. OAK WOODLAND AREA: | US Forest Service; Sec 20.517 | NO |
| 23. HARBOR DISTRICT: | Sec. 20.512 | NO |

**FOR PROJECTS WITHIN THE COASTAL ZONE ONLY**

| 24. LCP LAND USE CLASSIFICATION: | LCP Land Use maps/GIS | Pygmy Vegetation and Pygmy Type Vegetation |
| 25. LCP LAND CAPABILITIES & NATURAL HAZARDS: | GIS; 20.500.020 | Highly Productive Timberland |
| 26. LCP HABITATS & RESOURCES: | Barren and Pygmy Forest | Appealable to Coastal Commission |
| 27. COASTAL COMMISSION APPEALABLE AREA: | Point Arena Mountain Beaver Habitat | NO |
| 28. CDP EXCLUSION ZONE: | CDP Exclusion Zone Maps/GIS | NO |
| 29. HIGHLY SCENIC AREA: | Secs. 20.504.015, 20.504.020 | HIGHLY SCENIC-CONDITIONAL |
| 30. BIOLOGICAL RESOURCES & NATURAL AREAS: | Point Arena Mountain Beaver Habitat | NO |
| 31. BLUFFTOP GEOLOGY: | NO |
## COASTAL ZONE APPLICATION FORM

### APPLICANT
Name: AT&T c/o Leah Hernikl, Agent  
Mailing Address: 410 Clubhouse Drive  
City: Aptos  
State: CA  
Zip Code: 95003  
Phone: (408) 799-1182

### PROPERTY OWNER
Name: Berit B. Cattolico & Peter E. Boysen  
Mailing Address: 1731 Tanglewood Lane  
City: Roseville  
State: CA  
Zip Code: 95661  
Phone: (916) 474-4256

### AGENT
Name: Leah Hernikl, Agent for AT&T  
Mailing Address: 410 Clubhouse Drive  
City: Aptos  
State: CA  
Zip Code: 95003  
Phone: (408) 799-1182  
Email: lhernikl@j5ip.com

### PARCEL SIZE
- [ ] Square feet  
- [x] Acres  
- 76

### STREET ADDRESS OF PROJECT
- 25470 Ten Mile Road, Point Arena  
- 95468

### ASSESSOR'S PARCEL NUMBER(S)
- 027-306-13

---

I certify that the information submitted with this application is true and accurate.

- **Signature of Applicant/Agent:**  
  - Leah Hernikl  
  - 2/14/2020

- **Signature of Owner:**  
  - Berit B. Cattolico & Peter E. Boysen  
  - 2/16/2020

- **Signature of Owner:**  
  - Peter E. Boysen  
  - 2/19/2020
COASTAL ZONE - SITE AND PROJECT DESCRIPTION QUESTIONNAIRE

The purpose of this questionnaire is to relate information concerning your application to the Planning and Building Services Department and other agencies who will be reviewing your project proposal. Please remember that the clearer picture that you give us of your project and the site, the easier it will be to promptly process your application. Please answer all questions. Those questions which do not pertain to your project, please indicate "Not Applicable" or "N/A".

THE PROJECT

1. Describe your project and include secondary improvements such as wells, septic systems, grading, vegetation removal, roads, etc.

   Project is a modification to an existing communications facility. On the existing tower AT&T proposes to: remove and replace (3) antennas, install (6) Remote Radio Units (RRUs), install surge suppressor with fiber trunk and DC power trunks. Within the existing equipment shelter AT&T proposes equipment modifications to include installing a FIF rack and electrical breaker, and replacing DUS units and rectifiers.

2. If the project is residential, please complete the following:

<table>
<thead>
<tr>
<th>TYPE OF UNIT</th>
<th>NUMBER OF STRUCTURES</th>
<th>SQUARE FEET PER DWELLING UNIT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mobile Home</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Duplex</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Multifamily</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   If Multifamily, number of dwelling units per building: ______________________

3. If the project is commercial, industrial, or institutional, complete the following:

   - Total square footage of structures: No change
   - Estimated employees per shift: 0
   - Estimated shifts per day: N/A
   - Type of loading facilities proposed: N/A

4. Will the proposed project be phased?  □ Yes  □ No

   If Yes, explain your plans for phasing.
5. Are there existing structures on the property?  □ Yes  □ No
If yes, describe below and identify the use of each structure on the plot plan.

The existing communications facility hosts several carriers and consists of a fenced compound containing a lattice tower, 3 equipment shelters, one generator shelter, 2 freestanding generators and 2 propane tanks.

6. Will any existing structures be demolished?  □ Yes  □ No
Will any existing structures be removed?  □ Yes  □ No

If yes to either question, describe the type of development to be demolished or removed, including the relocation site, if applicable.

7. Project Height. Maximum height of structure  **No change: 150** feet.

8. Lot area (within property lines): 76 square feet  □ acres

9. Lot Coverage:

<table>
<thead>
<tr>
<th></th>
<th>EXISTING</th>
<th>NEW PROPOSED</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building coverage</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
</tr>
<tr>
<td>Paved area</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
</tr>
<tr>
<td>Landscaped area</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
</tr>
<tr>
<td>Unimproved area</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
<td>__________ square feet</td>
</tr>
</tbody>
</table>

**GRAND TOTAL:**  **No change** square feet
(Should equal gross area of parcel)

10. Gross floor area:  **No change** square feet (including covered parking and accessory buildings).

11. Parking will be provided as follows:

<table>
<thead>
<tr>
<th>Number of Spaces</th>
<th>Existing</th>
<th>Proposed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of covered spaces</td>
<td></td>
<td></td>
<td>Size</td>
</tr>
<tr>
<td>Number of uncovered spaces</td>
<td></td>
<td></td>
<td>Size</td>
</tr>
<tr>
<td>Number of standard spaces</td>
<td></td>
<td></td>
<td>Size</td>
</tr>
<tr>
<td>Number of handicapped spaces</td>
<td></td>
<td></td>
<td>Size</td>
</tr>
</tbody>
</table>
12. Utilities will be supplied to the site as follows:

A. Electricity
   ■ Utility Company (service exists to the parcel).
   □ Utility Company (requires extension of services to site: ______ feet ______ miles
   □ On Site generation, Specify: ________________________________________________
   □ None

B. Gas
   □ Utility Company/Tank
   ■ On Site generation, Specify: Existing generators on site, no changes proposed
   □ None

C. Telephone: □ Yes □ No

13. Will there be any exterior lighting? □ Yes □ No
   If yes, describe below and identify the location of all exterior lighting on the plot plan and building plans.

14. What will be the method of sewage disposal?
   □ Community sewage system, specify supplier ______________________________________
   □ Septic Tank
   □ Other, specify N/A

15. What will be the domestic water source?
   □ Community water system, specify supplier ______________________________________
   □ Well
   □ Spring
   □ Other, specify N/A

16. Is any grading or road construction planned? □ Yes □ No
   If yes, grading and drainage plans may be required. Also, describe the terrain to be traversed (e.g., steep, moderate slope, flat, etc.).

For grading and road construction, complete the following:

A. Amount of cut: ______________ cubic yards
B. Amount of fill: ______________ cubic yards
C. Maximum height of fill slope: ______________ feet
D. Maximum height of cut slope: ______________ feet
E. Amount of import or export: ______________ cubic yards
F. Location of borrow or disposal site: ______________________________________________


17. Will vegetation be removed on areas other than the building sites and roads?  □ Yes  □ No
   If yes, explain:

18. Does the project involve sand removal, mining or gravel extraction?  □ Yes  □ No
   If yes, detailed extraction, reclamation and monitoring may be required.

19. Will the proposed development convert land currently or previously used for agriculture to another use?  □ Yes  □ No
   If yes, how many acres will be converted? ___________ acres (An agricultural economic feasibility study may be required.)

20. Will the development provide public or private recreational opportunities?  □ Yes  □ No
    If yes, explain:

21. Is the proposed development visible from:

   A. State Highway 1 or other scenic route?  □ Yes  □ No
   B. Park, beach or recreation area?  □ Yes  □ No

22. Will the project involve the use or disposal of potentially hazardous materials such as toxic substances, flammables, or explosives?  □ Yes  □ No
    If yes, explain:

23. Does the development involve diking, filling, dredging or placing structures in open coastal waters, wetlands, estuaries or lakes?

   A. Diking  □ Yes  □ No
   B. Filling  □ Yes  □ No
   C. Dredging  □ Yes  □ No
   D. Placement of structures in open coastal waters, wetlands, estuaries or lakes  □ Yes  □ No

    Amount of material to be dredged or filled? __________ cubic yards.

    Location of dredged material disposal site: ____________________________________________

    Has a U.S. Army Corps of Engineers permit been applied for?  □ Yes  □ No

If you need additional room to answer any question, attach additional sheets.
Elevations
CASE: UM 2020-0002
OWNER: CATTOLICO, Berit, ET AL
APN: 027-306-13
APLCT: AT&T
AGENT: Leah Hernikl
ADDRESS: 25474 Ten Mile Road, Point Arena

 Assessors Parcels

ADJACENT PARCELS
CASE: UM 2020-0002
OWNER: CATTOLICO, Berit, ET AL
APN: 027-306-13
APLCT: AT&T
AGENT: Leah Hernkl
ADDRESS: 25474 Ten Mile Road, Point Arena

Shinglemill-Gibney Complex
Bishop Pine

MENDOCINO COUNTY PLANNING DEPARTMENT- 3/30/2020

WESTERN SOIL CLASSES
CASE: UM 2020-0002
OWNER: CATTOLICO, Berit, ET AL
APN: 027-306-13
APLCT: AT&T
AGENT: Leah Hernikl
ADDRESS: 25474 Ten Mile Road, Point Arena

Mendocino Cypress
Listing Type
- Closed-Cone Pine-Cypress
- Coastal Scrub
- Urban

MENDOCINO COUNTY PLANNING DEPARTMENT - 3/30/2020

Assessors Parcels

MENDOCINO CYRRESS
Eligible Facilities Request Application
(47 U.S.C. § 1455(a))

Applicant: AT&T

Applicant/Agent Contact Information: Leah Hernikl, Agent for AT&T
410 Clubhouse Drive, Aptos, CA 95003 / (408) 799-1182 / lhernikl@jip.com

Property Owner: Berit Cattolico and Peter Boysen

Property Location (e.g., address, parcel no., GPS coordinates): 25470 Ten Mile Road, Point Arena
APN: 027-306-13

Project Description: Antenna replacement and addition of Remote Radio Units on existing tower; no change in height. The replacement antennas will be 5" higher than existing antennas but do no increase the overall height of the tower. Modifications to equipment within existing equipment shelter building.

Date of filing: 3/16/2020

30 days after filing: 4/16/2020

“To toll the timeframe for incompleteness, the reviewing State or local government must provide written notice to the applicant within 30 days of receipt of the application, clearly and specifically delineating all missing documents or information. Such delineated information is limited to documents or information meeting the standard under paragraph (c)(1) of this section.” 47 C.F.R. 1.40001(c)(3)(i).

60 days after filing: 5/18/2020

“Timeframe for Review. Within 60 days of the date on which an applicant submits a request seeking approval under this section, the State or local government shall approve the application unless it determines that the application is not covered by this section.” 47 C.F.R. 1.40001(c)(2).
1. Is the proposed modification an Eligible Support Structure? Please check the applicable boxes:

   An “Eligible Support Structure” means “Any tower or base station as defined in this section, provided that it is existing at the time the relevant application is filed with the State or local government under this section.” 47 C.F.R. 1.40001(b)(4).

   ✔ “Tower” means “Any structure built for the sole or primary purpose of supporting any Commission-licensed or authorized antennas and their associated facilities, including structures that are constructed for wireless communications services including, but not limited to, private, broadcast, and public safety services, as well as unlicensed wireless services and fixed wireless services such as microwave backhaul, and the associated site.” 47 C.F.R. 1.40001(b)(9).

   Or

   ☐ “Base Station” means “A structure or equipment at a fixed location that enables Commission-licensed or authorized wireless communications between user equipment and a communications network. The term does not encompass a tower as defined in this subpart or any equipment associated with a tower.

   (i) The term includes, but is not limited to, equipment associated with wireless communications services such as private, broadcast, and public safety services, as well as unlicensed wireless services and fixed wireless services such as microwave backhaul.

   (ii) The term includes, but is not limited to, radio transceivers, antennas, coaxial or fiber-optic cable, regular and backup power supplies, and comparable equipment, regardless of technological configuration (including Distributed Antenna Systems and small-cell networks).

   (iii) The term includes any structure other than a tower that, at the time the relevant application is filed with the State or local government under this section, supports or houses equipment described in paragraphs (b)(1)(i)-(ii) of this section that has been reviewed and approved under the applicable zoning or siting process, or under another State or local regulatory review process, even if the structure was not built for the sole or primary purpose of providing such support.

   (iv) The term does not include any structure that, at the time the relevant application is filed with the State or local government under this section, does not support or house equipment described in paragraphs (b)(1)(i)-(ii) of this section.” 47 C.F.R. 1.40001(b)(1).

   ✗ “Existing” – “A constructed tower or base station is existing for purposes of this section if it has been reviewed and approved under the applicable zoning or siting process, or under another State or local regulatory review process, provided that a tower that has not been reviewed and approved because it was not in a zoned area when it was built, but was lawfully constructed, is existing for purposes of this definition.” 47 C.F.R. 1.40001(b)(5).

2. What is the baseline height of the Eligible Support Structure? Please complete the Baseline Height Worksheet and insert baseline height here ___150___ . For modifications that will not change the height of the Eligible Support Structure, insert “N/A.”
3. Is the proposed modification an **Eligible Facilities Request**?

An “Eligible Facilities Request” means “Any request for modification of an existing tower or base station that does not substantially change the physical dimensions of such tower or base station, involving:

(i) collocation of new transmission equipment;
(ii) removal of transmission equipment; or
(iii) replacement of transmission equipment.”

47 C.F.R. 1.40001(b)(3); 47 U.S.C. 1445(a).

“Collocation” means “The mounting or installation of transmission equipment on an eligible support structure for the purpose of transmitting and/or receiving radio frequency signals for communications purposes.” 47 C.F.R. 1.40001(b)(2).

“Transmission equipment” means “Equipment that facilitates transmission for any Commission-licensed or authorized wireless communication service, including, but not limited to, radio transceivers, antennas, coastal or fiber-optic cable, and regular and backup power supply. The term includes equipment associated with wireless communications services including, but not limited to, private, broadcast, and public safety services, as well as unlicensed wireless services and fixed wireless services such as microwave backhaul.” 47 C.F.R. 1.40001(b)(8).

3.1 Please check all applicable boxes that describe the proposed modification:

☑ Collocation of new transmission equipment
☑ Removal of transmission equipment
☑ Replacement of transmission equipment

3.2 Please complete the Substantial Change Worksheet to determine if the proposed modification **substantially changes the physical dimensions** of the Eligible Support Structure. Based on the Substantial Change Worksheet, will the proposed modification substantially changes the physical dimensions of the Eligible Support Structure? NO.

If you answered “Yes,” stop because the application is not an eligible facilities request.

4. Compliance with State and Federal regulations and codes. The proposed modification—

**Check all applicable boxes**

☑ Will comply with FCC regulations regarding human exposure to radio frequency electromagnetic fields
☑ Will comply with Federal Aviation Administration (FAA) and FCC tower lighting requirements
☑ Will comply with applicable state environmental regulations
☑ Will comply with applicable building codes
Will comply with applicable fire codes

Will comply with other non-discretionary and generally applicable structural and safety codes

☐ Will comply with Section 106 historic preservation review, if applicable

☐ Will comply with the National Environmental Policy Act (NEPA), if applicable

5. Attachments:

☑ Completed Baseline Height Worksheet

☑ Completed Substantial Change Worksheet

☑ Letter of authorization

☑ Applicable non-discretionary permit fees

☑ Building drawings, including site details and plans

☑ Documentation of property rights to site

☑ Prior approval for Eligible Support Structure

☐ Other: __________________________________________________________

_________________________________________________

_________________________________________________
Baseline Height Worksheet

1. Does the application seek approval for collocation or replacement of transmission equipment?
   - [ ] No. Stop, the height will not increase for removal of transmission equipment. Continue to #7 and respond “N/A.”
   - [✓] Yes. Continue to #2.

2. Was the tower or base station subject to previous review and approval by the local jurisdiction (as originally built or as modified to its current state)?
   - [✓] Yes. Continue to #3.
   - [ ] No. Does the application seek to modify a tower or base station that was in a zoned area when built?
     A. [ ] No. Was the tower or base station lawfully constructed?
        i. [ ] Yes. Continue to #3.
        ii. [ ] No. Stop, the application is not an Eligible Facilities Request.
     B. [ ] Yes. Stop, the application is not an Eligible Facilities Request (because the tower or base station is not considered “existing”).

3. Does the application seek to collocate transmission equipment that will be separated horizontally on a base station (such as on a rooftop)?
   A. [ ] Yes. Continue to #7. The baseline height is that of the original support structure (e.g., the height of the rooftop, penthouse).
   B. [✓] No. Continue to #4.

4. Has the tower or base station been modified per a previous approval by the local jurisdiction?
   A. [ ] No. Continue to #7. The baseline height is the originally-approved height of the tower or base station.
   B. [✓] Yes. Continue to #5.

Baseline Height Worksheet Page 1 of 2

Applicant Initials _____
5. Was the tower or base station modified based on approval by the local jurisdiction issued before February 17, 2012?\(^1\)

A. Yes. Continue to #6.

B. No. Continue to #7. The baseline height is the height of the tower or base station as of February 17, 2012.

6. Was the tower or base station modified to the maximum height approved by the local jurisdiction per any approval(s) before February 17, 2012?

A. Yes. Continue to #7. The baseline height is the existing height of the tower or base station.

B. Yes. Continue to #7. The baseline height is the height as approved by the local jurisdiction before February 17, 2012.

7. Insert baseline height here \(150\)’ and at item 2 to the Eligible Facilities Request Application.

\(^1\) The Spectrum Act was passed by Congress on February 17, 2012 and signed into law by the President on February 22, 2012. The FCC’s Report and Order and regulations refer to the date of passage rather than date of enactment as the trigger for the analysis. Approvals issued after February 17, 2012 do not affect the baseline dimensions for determining whether an application proposes a substantial change.
Substantial Change Worksheet

Definition of “Substantial Change”:

"Substantial Change" means "A modification substantially changes the physical dimensions of an eligible support structure if it meets any of the following criteria:

(i) for towers other than towers in the public rights-of-way, it increases the height of the tower by more than 10% or by the height of one additional antenna array with separation from the nearest existing antenna not to exceed twenty feet, whichever is greater; for other eligible support structures, it increases the height of the structure by more than 10% or more than ten feet, whichever is greater;

(A) Changes in height should be measured from the original support structure in cases where deployments are or will be separated horizontally, such as on buildings’ rooftops; in other circumstances, changes in height should be measured from the dimensions of the tower or base station, inclusive of originally approved appurtenances and any modifications that were approved prior to the passage of the Spectrum Act.

(ii) for towers other than towers in the public rights-of-way, it involves adding an appurtenance to the body of the tower that would protrude from the edge of the tower more than twenty feet, or more than the width of the tower structure at the level of the appurtenance, whichever is greater; for other eligible support structures, it involves adding an appurtenance to the body of the structure that would protrude from the edge of the structure by more than six feet;

(iii) for any eligible support structure, it involves installation of more than the standard number of new equipment cabinets for the technology involved, but not to exceed four cabinets; or, for towers in the public rights-of-way and base stations, it involves installation of any new equipment cabinets on the ground if there are no pre-existing ground cabinets associated with the structure, or else involves installation of ground cabinets that are more than 10% larger in height or overall volume than any other ground cabinets associated with the structure;

(iv) it entails any excavation or deployment outside the current site; 

(v) it would defeat the concealment elements of the eligible support structure; or

(vi) it does not comply with conditions associated with the siting approval of the construction or modification of the eligible support structure or base station equipment, provided however that this limitation does not apply to any modification that is noncompliant only in a manner that would not exceed the thresholds identified in § 1.40001(b)(7)(i)-(iv)."

47 C.F.R. 1.40001(b)(7).

1. Check the box that describes the Eligible Support Structure:

☐ Base station. Continue to #2.

☐ Tower located in the public right-of-way. Continue to #2.

☑ Tower located outside of the public right-of-way. Continue to #3.

---

2 “Site” – “For towers other than towers in the public rights-of-way, the current boundaries of the leased or owned property surrounding the tower and any access or utility easements currently related to the site, and, for other eligible support structures, further restricted to that area in proximity to the structure and to other transmission equipment already deployed on the ground.” 47 C.F.R. 1.40001(b)(6).
2. Answer the following questions about the proposed modification and proceed as instructed:

   A. Is the baseline height for the Eligible Support Structure greater than 100 feet?
      □ Yes. Continue to item 2B.
      □ No. Continue to item 2C.

   B. Does the proposed modification increase height by more than 10% of the baseline height?
      □ Yes. Continue to item 11.
      □ No. Continue to item 2D.

   C. Does the proposed modification increase height by more than 10 feet?
      □ Yes. Continue to item 11.
      □ No. Continue to item 2D.

   D. Does the proposed modification add any appurtenance that would protrude more than 6 feet from edge of the Eligible Support Structure?
      □ Yes. Continue to item 11.
      □ No. Continue to item 4.

3. Answer the following questions about the proposed modification and proceed as instructed:

   A. Will the proposed modification increase height by more than 10% of the baseline height of the Eligible Support Structure?
      □ Yes. Continue to item 3B.
      □ No. Continue to item 3C.

   B. Will the proposed modification increase height by more than the height of one additional antenna array with separation from the nearest existing antenna not to exceed 20 feet?
      □ Yes. Continue to item 11.
      □ No. Continue to item 3C.
C. Does the proposed modification add any appurtenance that would protrude more than 20 feet from the edge of the Eligible Support Structure?
   - Yes. Continue to item 3D.
   - ☑ No. Continue to item 4.

D. Does the proposed modification add any appurtenance that would protrude more than the width of the tower structure at the level of the appurtenance?
   - Yes. Continue to item 11.
   - ☑ No. Continue to item 4.

4. Does the proposed modification involve installation of more than standard number of equipment cabinets for the technology involved, not to exceed four?
   - Yes. Continue to item 11.
   - ☑ No. If the Eligible Support Structure is a base station, continue to item 5.
      - If the Eligible Support Structure is a tower in the public right-of-way, continue to item 5.
      - If the Eligible Support Structure is a tower outside of the public right-of-way, continue to item 8.

5. Does the proposed modification involve installation of any new equipment cabinets on the ground?
   - Yes. Continue to item 6.
   - ☑ No. Continue to item 8.

6. Are there any pre-existing ground cabinets associated with the Eligible Support Structure?
   - ☑ Yes. Continue to item 7.
   - ☐ No. Continue to item 11.

7. Are the proposed new ground cabinets more than 10% larger in height or overall volume than any other ground cabinets associated with the Eligible Support Structure?
   - ☐ Yes. Continue to item 11.
   - ☑ No. Continue to item 8.
8. Does the proposed modification involve excavation or deployment outside of the current site? 

☐ Yes. Continue to item 11.
☐ No. Continue to item 9.

9. Will the proposed modification defeat the existing concealment elements of the Eligible Support Structure?

☐ Yes. Continue to item 11.
☐ No. Continue to item 10.

10. Will the proposed modification comply with conditions associated with the siting approval(s)?

A. ☑ Yes. Continue to item 12.

☐ No. Describe the non-compliance: ____________________________________________
______________________________________________________
______________________________________________________

Continue to item 10B.

☐ Not applicable. Continue to item 12.

B. Is the non-compliance with conditions associated with the siting approval(s) based on any of the following: (a) height, (b) protrusion of any appurtenance from edge of the Eligible Support Structure, (c) number of equipment cabinets to be installed, (d) location of excavation, or (e) impact to concealment elements that would not exceed the thresholds outlined above?

☐ Yes. Continue to item 12.

☐ No. Continue to item 11.

11. The proposed modification is a substantial change to the physical dimensions of the existing tower or base station. Insert “Yes” in item 3.2 of the Eligible Facilities Request Application.

12. The proposed modification is not a substantial change to the physical dimensions of the existing tower or base station. Insert “No” in item 3.2 of the Eligible Facilities Request Application.

3 See footnote 2.

Substantial Change Worksheet Page 4 of 4

Applicant Initials ______