

June 29, 2009

The Honorable Board of Supervisors
County of San Mateo
400 County Center
Redwood City, CA 94063-1662

Re: Re-consideration of a Use Permit Renewal for a Sprint Cellular Communication site at 1175 Palomar Drive in the unincorporated Palomar Park area of San Mateo County PLN 200-00497

Dear Honorable Supervisors;

As a community, Palomar Park fought long and hard to have this permit renewal denied for the cellular site at 1175 Palomar (Site) and succeeded in December of 2007 with the Supervisors voting to deny Sprint their permit. With this ruling Palomar Park was much relieved that our community would not become a collection of cellular sites, but we also recognized that without an updated set of regulations for cellular sites in unincorporated residential areas our community was still at risk. In 2008 we spent many hours working with the County Staff and Planning Commission toward drafting new regulations for cellular sites in unincorporated residential areas. The BoS passed this regulation on December 9, 2008.

During the discussion of these new regulations only Verizon provided input even though all the cellular companies were contacted. Verizon was a very good neighbor as they worked with County Staff and Palomar Park, even holding joint meetings to work through issues.

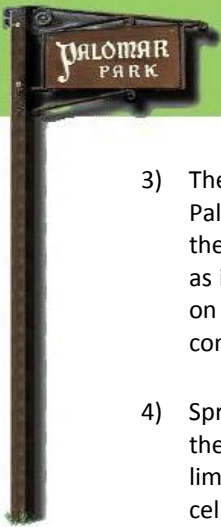
We bring this up now to frame our objections. As a community we have been deeply involved with and understand the issues of how to protect a residential area while allowing cellular companies to provide coverage.

In reviewing both the new evidence provided by Sprint dated 12/5/08 and the County Staff report, Palomar Park's position on this use permit has not changed. We urge the BoS to vote to deny the permit based on the following reasons:

- 1) Cellular sites and residential areas are not compatible. 1175 Palomar Dr. already has one permitted cellular site from T-Mobile at this location. Approving Sprint would make two sites with no development plan in place to limit the total number of operators. Section 6512.6 state a 10 year build out plan is required for renewal of a permit. Additionally, Section 6513.A states that section 6512 be applied if the original use permit did not call for future co-location. These sections should be upheld before any renewal permit can be issued.
- 2) Sprint's own documents presented in 2007 show that the Site only provides fill-in coverage for Crestview Drive (sector A) and Edgewood Road below 280 (sector B), but provides coverage for Cordilleras Road (Sector C). Figure 1 shows Sprint's documents for RF coverage and strength with and without the cellular site at 1175 Palomar. From these plots in figure 1, it is nearly impossible to determine the impact the Site will have. A more useful way to view the data is in Figure 2, where the plot for "Without" is subtracted from the plot "With" and superimposed on map. In reviewing Figure 2 the following can be seen:
 - a. For Sector A, the Site provides additional coverage only to the canyon between Crestview and 280.
 - b. For Sector B, the Site provides no additional coverage.
 - c. For Sector C the site provides additional coverage to Emerald Hills and Cordilleras Road

Figure 2 shows that only Sector C of the Site provides additional coverage. Sectors A and B may off load other existing sites, but sectors A & B are not need for complete coverage.

This is also borne out by Sprint's average call data as Sector A averages 264 calls, Sector B averages 203 calls, and Sector C has 2215 calls.



- 3) The new evidence from Sprint stated that the four review sites cannot provide the coverage that the 1175 Palomar site can. Sprint argument is that a single site cannot provide coverage. This is not true if you look at the real call load of the site is only in Sector C. The area covered by Sector C is a challenge for all of the carriers as it is in a canyon. Other carriers such as Metro PCS have solved this problem by mounting small cellular sites on telephone poles in the canyon. Why is this not an option for Sprint? Coverage can be provided through a combination of existing sites and new smaller site on Edgewood road.
- 4) Sprint's proposal states that 75 to 150 foot towers would be needed to provide coverage. Sprint has not read the current code as Section 6513.1.F.2 clear state that the proposed height of towers is simple not allowed, limiting towers to 28-36 feet in residential areas. The section was written to encourage the use of smaller cellular sites. It is unclear why Sprint would undertake studies of site design that are so incompatible with County regulations. Shouldn't Sprint be required to provide a study of alternate cellular sites that meet County code as other carriers are?

In conclusion there are better options for Sprint to provide coverage of the 1175 Palomar Site using a combination of existing sites and new smaller sites, in the Edgewood Road canyon area.

We ask that the Board of Supervisor to uphold the denial of permit as you did in December of 2007.

Sincerely,

Palomar Property Owners Board

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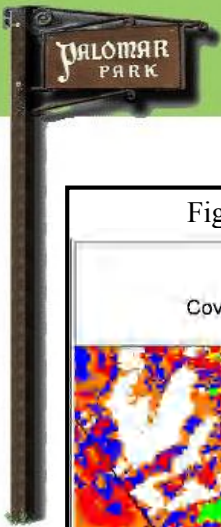


Figure 1 2007 Data from Sprint – RF cover & Strength Without/With Cellular site at 1175 Palomar

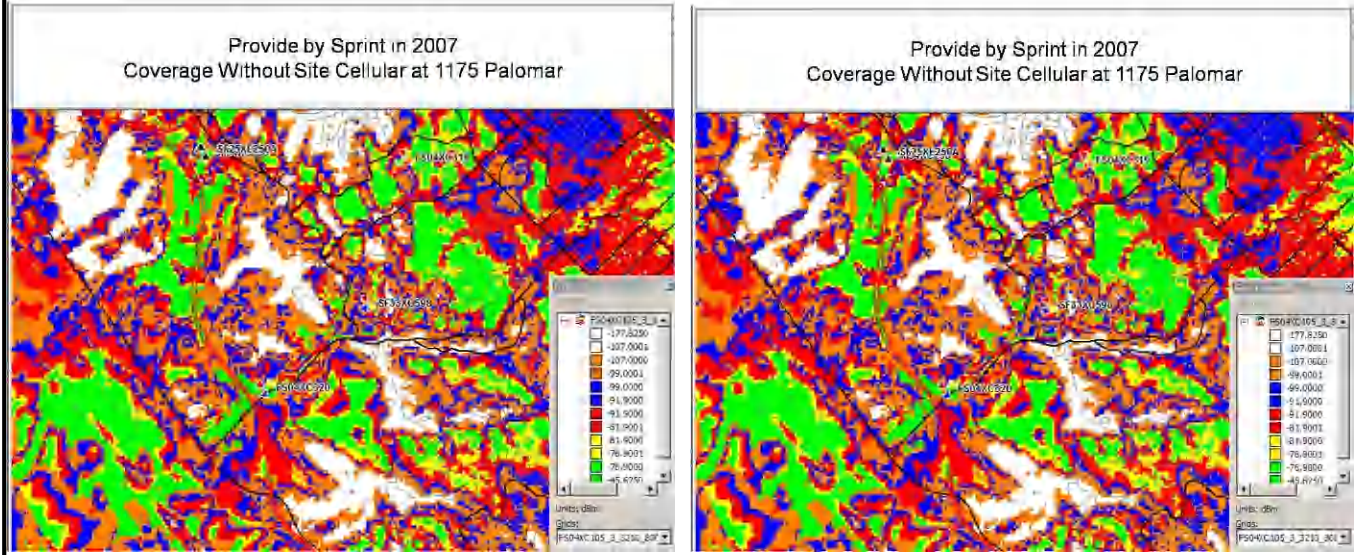


Figure 2: Difference between coverage map in Figure 1 – Actual coverage of cellular site at 1175 Palomar

