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Date: March 26, 2024

To: Calaveras County Planning Commissioners and Planning Director

From: C. Platt, MyValleySprings.com

Re: Comments for PC Review of Telecommunications Facilities in Draft Zoning Code

Dear Planning Commissioners and Planning Director,

Thank you for working diligently on the Calaveras County Zoning Code Update for months, and for the "PC Review Draft Zoning Code Feb 2024 WITH TRACK CHANGES." We have been watching every meeting, and appreciate and support most provisions and revisions. Some sections you have not discussed yet, such as Animal Keeping and Telecommunications, and we are not sure when these will be addressed.

When you get to Telecommunications Facilities, we have a few concerns, and ideas for improvement and strengthening. We would appreciate your consideration of these comments. The sections we have concerns with are quoted below (with our suggestions following the section).

17.25.210 Telecommunication Facilities

[pg. 155-162 of Feb. 2024 Zoning Code document]

B. Permit Requirements [pg 157]

2. "Stealth facilities" ...permitted in all zones with AUP."

Suggestion: PLEASE REQUIRE A CONDITIONAL USE PERMIT (CUP) for ALL cell towers in Residential Zones, regardless of any "stealth" designation or description as "architectural or natural feature." These 80-120 foot towers and 40x40 foot equipment structures are quite intrusive; they are not "hidden" and are aesthetically negatively impactful to residences in a natural, peaceful rural community. And please require the applicant to do in-depth studies of Alternative Sites, to find the least-intrusive location.

C. Standards

1. Location and Siting [pg 157]

a. "...telecommunications facilities shall meet the building setback standards of the zone..."

Suggestion: Please INCREASE standard "building" setback requirements for cell towers, especially in Residential zones, and/or near existing residences. An 80 to 120-foot tall cell tower facility with equipment is not a normal building, and should be setback much farther from adjacent residences than a

standard building setback. We suggest a minimum of 150 feet from any existing Residential buildings on-site or on adjacent properties.

3. Height Requirements. [pg 158] “The maximum height of telecommunications facilities shall be as provided below.”

Suggestion: Please add "Maximum height of 10 feet over permitted height for Zoning District" (as per 3/13 PC discussion on Height Exceptions).

4. Design and Screening

e. “Landscaping... shall be provided...to screen any ground structures and equipment *from a public right-of-way.*” [pg 160]

Suggestion: Please add a requirement to also screen cell tower structures and equipment visible from existing private adjacent residences and businesses (not just from public right-of-ways).

5. Security Features [pg 160]

b. Maintenance. “The permittee shall be responsible for maintaining the site and facilities free from graffiti.”

Suggestion: Add more Maintenance requirements besides graffiti-free, such as “Landscaping shall be irrigated and maintained for the life of the facility. Site facilities shall be maintained in good working and visual condition, and free from fallen debris from cell tower branches, leaves, or antennas.”

These are just some ideas—you may have much better ones! Thank you for considering our suggestions, and thank you for your time.

Respectfully,

Colleen Platt
Secretary, MyValleySprings.com

Cc: Joyce Techel, President, MyValleySprings.com