



On Behalf of



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AT&T Project Number: CLL01430  
AT&T Project Name: Margarita Substation

**County of Orange**  
**Application for a Conditional Use Permit**  
*Project Information and Justification*  
*Letter of Colocation Efforts and Alternative Site Analysis*

AT&T Mobility (AT&T) is requesting approval of a Conditional Use Permit for a Wireless Facility application for the construction and operation of an unmanned wireless telecommunications facility (cell site), and presents the following project information for your consideration:

**Project Location**

Address: 23082 ANTONIO PKWY, LADERA RANCH, CA 92694  
APN: 125-181-03  
Zoning designation: A1- GENERAL AGRICULTURE

**Project Representative**

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**AT&T Contact**

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**Project Description**

AT&T proposes to construct an unmanned wireless telecommunications facility camouflaged as a eucalyptus tree on the property. The antennas will be screened between branches of the mono-eucalyptus structure. The associated equipment cabinets will be located within an 8-foot-tall CMU wall enclosure with stone veneer. AT&T will work with the County and the community to install a state-of-the-art stealth site which will provide a benefit to the residents and visitors of the area.

The equipment will consist of: 35-foot mono-eucalyptus structure, 6' x 6' Steel walk-in cabinet (WIC) shelter on concrete pad, twelve panel antennas (four per sector), eighteen RRUs at antenna level (six per sector), one GPS antenna, one 2' Microwave antenna, a 20 kilowatt 103 gallon generac compact generator on concrete containment pad, four DC-9 surge suppressors, and two DC-12 Outdoor units within the walk-in cabinet.

## Hours of Operation & Number of Employees

The wireless facility will be in operation 24 hours a day, 7 days a week but is an unmanned facility. A networks operation personnel member will visit the site every 4-6 weeks for general maintenance review.

## Project Objectives

There are several reasons why a wireless carrier requires the installation of a cell site within a specified area to close a “significant gap in coverage:”

- The radio signal must be of sufficient strength to achieve consistent, sustainable, and reliable service to customers at a *level sufficient for outdoor, in-vehicle, and in-building penetration with good voice quality* (Threshold, -76db).
- When nearby other sites become overloaded, and more enhanced voice and data services are used (5G and other high-speed data services) signal contracts and a gap is created. With heavy use it is intensified due to the unique properties of digital radio transmissions.

In this specific case, this location was selected because AT&T’s radio-frequency engineers (RF) have identified a significant gap in coverage in the vicinity of **Antonio Parkway** and the surrounding community as demonstrated on the enclosed radio-signal propagation maps.

## The proposed use is necessary to close a significant gap in coverage.

The wireless facility is necessary to close a significant gap in coverage, exhibited in the justification package dated April 18, 2023 on pages 5-7. Page Five shows the significant coverage gap based on analysis of the AT&T system. Page Six shows the coverage gap addressed by the placement of the proposed wireless facility on the site indicated above. Page Seven shows the signal coverage the proposed wireless facility will provide in a vacuum. As is noted, the placement of the wireless facility proposed will address the significant gap in coverage. The proposed wireless facility is necessary to address the significant gap in coverage as a different placement or proposed antenna structure would cover less geographic area. AT&T is proposing the minimum necessary antenna schedule as is necessary to address the gap in coverage shown in Slide Three.

## AT&T’s search area representing significant coverage gap



## Alternative Site Analysis

The following locations were evaluated and the reasons why they were not selected for this project are addressed:

- **The vast majority of the properties within the search area indicated above represent single family residential, providing many complications when considered for a freestanding wireless array. Those complications include public resistance, unwilling land owners, lack of space, and most importantly it is difficult to stealth a wireless array on a property zoned for single family residential. Most importantly, the HOA (Ladera Ranch Maintenance Corporation) controlling the majority of these properties did not show any interest when contacted concerning the two following alternative locations.**
- **SCE Tower @ 33.542606, -117.641253 (Priority Area indicated above) – APN: 741-221-01. Landowner: Ladera Ranch Maintenance Corporation. Landowner failed to indicate interest in the project so this alternative was rejected. This project requires cooperation from the landowner because equipment would need to be placed on the ground.**
- **SCE Tower @ 33.5471, -117.6418 (Secondary Area indicated above) – APN: 741-112-02. Landowner: Ladera Ranch Maintenance Corporation. Landowner failed to indicate interest in the project so this alternative was rejected. This project requires cooperation from the landowner because equipment would need to be placed on the ground.**

## Findings/Burden of Proof

*The proposed use is consistent with the adopted General Plan.*

AT&T confirms that the plans will conform to the requirements under the General Plan, specifically those requirements set out for Wireless Facilities.

*The proposed use will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area.*

The project will not have an adverse effect upon adjacent or abutting properties as it is a stealth design that will blend naturally with the subject property and the surrounding community. The project will provide a public benefit of better wireless telecommunications and data services to the surrounding neighborhoods and community.

*Description of surrounding uses to the North, South, East and West:*

The project is proposed on a piece of property designated as Commercial General. To the East, North and South are properties designated as GENERAL AGRICULTURE. The property to the West is Single Family Residential.

*Description of population served by the proposed use or project.*

AT&T intends to serve the surrounding community near the project, with the increased wireless signal available with addition of this facility and the inclusion of First Net which prioritizes calls going to emergency responders. Further information on the spread of signal added with the proposed facility associated with this project is available on the Justification Package dated April 18, 2023 (power point document) submitted in association with this narrative.

*The proposed use will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site.*

The project will not have an adverse effect upon adjacent or abutting properties as it is a stealth design that will blend naturally with the subject property and the surrounding community.

*The proposed use will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.*

The proposed use is a Wireless Facility, in the form of a mono-eucalyptus with required equipment area. There is no aspect of this project which will jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare. In point of fact, the project will serve the public safety and general welfare with additional wireless signal and First Net support for first responder services.

*The site for the proposed use is adequate in size and shape.*

AT&T is proposing a mono-eucalyptus design for this project which is considered a stealth design in accordance with the Orange County general code. The requested height of the mono-eucalyptus design is the minimum height necessary in order to fill the significant gap in coverage for this project. AT&T uses the most advanced technology and design when constructing the mono-pine so as to blend the facility with the surrounding community and landscaping and thereby minimizing the visual impact of the site.

## **GENERAL INFORMATION**

### **Site Selection**

Customer demand drives the need for new cell sites. Drive-tests to gauge wireless signals in the area are conducted, and scientific modeling using sophisticated software is evaluated. Once the area requiring a new site is identified, a target ring on a map is provided to a real estate professional to begin a search for a suitable location.

During an initial reconnaissance, properties for consideration for the installation of a cell site must be located in the general vicinity of the ring, with an appropriate zoning designation, and appear to have enough space to accommodate an antenna structure and the supporting radio equipment. The size of this space will vary depending on the objective of the site. The owners of each prospective location are notified to assess their interest in partnering with AT&T.

Four key elements are considered in the selection process:

- **Leasing:** The property must have an owner who is willing to enter into a long-term lease agreement under very specific terms and conditions.
- **Zoning:** It must be suitably zoned in accordance with local land-use codes to allow for a successful permitting process.
- **Construction:** Construction constraints and costs must be reasonable from a business perspective, and the proposed project must be capable of being constructed in accordance with local building codes and safety standards.
- **RF:** It must be strategically located to be able to achieve the RF engineer's objective to close the significant gap with antennas at a height to clear nearby obstructions.

### **The Benefits to the Community**

Approximately 90-percent of American adults subscribe to cell phone service. People of all ages rely increasingly on their cell phones to talk, text, send media, and search the Internet for both personal and business reasons. More and more, they are doing these things in their homes, therefore, becoming reliant on adequate service within residential neighborhoods. In fact, 50-percent of people relocating are not signing up for landline service at their new location and are using their cell phone as their primary communication method.

The installation and operation of the proposed facility will offer improved:

- Communications for local, state, and federal emergency services providers, such as police, fire, paramedics, and other first-responders.
- Personal safety and security for community members in an emergency, or when there is an urgent need to reach family members or friends. Safety is the primary reason parents provide cell phones to their children. Currently 25% of all preteens, ages 9 to 12, and 75% of all teens, aged 13 to 19, have cell phones.
- Capability of local businesses to better serve their customers.
- Opportunity for a city or county to attract businesses to their community for greater economic development.
- Enhanced 911 Services (E911) – The FCC mandates that all cell sites have location capability. Effective site geometry within the overall network is needed to achieve accurate location information for mobile users through triangulation with active cell sites. (Over half of all 911 calls are made using mobile phones.)

### **Safety – RF is Radio**

The FCC regulates RF emissions to ensure public safety. Standards have been set based on peer-reviewed scientific studies and recommendations from a variety of oversight organizations, including the National Council on Radiation Protection and Measurements (NCRP), American National Standards Institute (ANSI), Institute of Electrical and Electronics Engineers (IEEE), Environmental Protection Agency (EPA), Federal Drug Administration (FDA), Occupational Safety and Health Administration (OSHA), and National Institute for Occupational Safety and Health (NIOSH).

Although the purview of the public safety of RF emissions by the FCC was established by the Telecommunications Act of 1996, these standards remain under constant scrutiny. All AT&T cell sites operate well below these standards, and the typical urban cell site operates hundreds or even thousands of times below the FCC's limits for safe exposure.

### **AT&T Company Information**

AT&T is one of the fastest growing nationwide service providers offering all digital voice, messaging and high-speed data services to nearly 30 million customers in the United States.

AT&T is a “telephone corporation”, licensed by the Federal Communications Commission (FCC) to operate in the 1950.2-1964.8, 1965.2-1969.8 MHz and 1870.2-1884.8-1889.8 MHz frequencies, and a state-regulated Public Utility subject to the California Public Utilities Commission (CPUC). The CPUC has established that the term “telephone corporation” can be extended to wireless carriers, even though they transmit signals without the use of telephone lines.

AT&T will operate this facility in full compliance with the regulations and licensing requirements of the FCC, Federal Aviation Administration (FAA) and the CPUC, as governed by the Telecommunications Act of 1996, and other applicable laws.

### **Conclusion**

The Proposed Facility is the least intrusive means by which AT&T can close its significant service coverage gap. Denial of the site or a reduction in height will materially inhibit AT&T from providing and improving wireless service in this portion of Orange County.

The enclosed application is presented for your consideration. AT&T requests a favorable determination and approval of this Conditional Use Permit application to build the proposed facility. Please contact me at (818) 823-0631 or [john.silverman@smarlinkgroup.com](mailto:john.silverman@smarlinkgroup.com) for any questions or requests for additional information.

Respectfully submitted,

*John Silverman*

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John Silverman  
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Smartlink, on behalf of AT&T