

From: [Sidnee Cox](#)
To: [Jean Kapolchok](#); [Tim Freeman](#); [Larry Reed](#); [Pat Gilardi](#); [Tom Bahning](#); [Chuck Striplen](#); [Shaun McCaffery](#); [Eric Koenigshofer](#); [Webster Marquez](#); [Doug Bush](#)
Cc: [Paul-Andre](#)
Subject: Fwd: Recommended Revisions to the Telecommunications Facilities Ordinance
Date: Tuesday, March 10, 2026 1:18:18 PM
Attachments: [PastedGraphic-1.png](#)

EXTERNAL


From: Paul-André Schabracq & Sidnee Cox, EMF Safety Network
Subject: Proposed changes to the County's Telecommunications Ordinance

Background

We thank the *Telecommunications Ad Hoc Committee* for proposing revisions to strengthen Sonoma County's Telecommunications Facilities Ordinance.

Outlined below are some additional revisions for your review and consideration:

Suggested Revisions to Sonoma County's Telecommunications Facilities Ordinance and Applications Checklist

- 1. Require a Pre-Submittal Conference:** Before application submittal, the applicant shall schedule and attend a pre-submittal conference with the Planning Director to streamline the review process through an informal discussion that includes the appropriate project classification and review process; issues in connection with the proposed or existing wireless tower or base station; and application completeness issues.
- 2. Revise the Telecommunications Facilities Application Checklist:** Revise the County's existing checklist, adding the relevant requirements of the revised Telecommunications facilities ordinance § 26C-325.7. This will ensure that all of the information required for staff, appointed and elected officials and the public have the information required to make informed decisions. Establishing when an application is deemed complete clearly facilitates establishing the start date for the shot clock. Make this document available to the public. 
- 3. Community Meeting:** Applicants shall conduct a publicly noticed community meeting at least 2 weeks prior to the Planning Commission hearing date. All property owners 600 ft. within of the boundaries of the subject parcel on which the applicant proposes the facility or modification shall be noticed.
- 4. RF Compliance Report:** Require the applicant to prepare an RF exposure compliance report, prepared and certified by an RF engineer, that certifies the proposed facility, as well as any collocated facilities and any cumulative RF emissions from nearby cell towers (or rooftop installations), will comply with applicable federal NIER (Non-Ionizing Electromagnetic Radiation) human exposure standards and limits. This report shall include the following:

- a) the frequency, actual or maximum power levels in watts effective radiated power (ERP), and the actual or maximum transmitting channels for all existing and proposed antennas at the site.
- b) the location and orientation of all transmitting antennas.
- c) the boundaries of areas with RF exposures whether individually or cumulatively in excess of the controlled/occupational limit (as defined by the FCC). Each such boundary must be clearly marked and identified for every transmitting antenna at the proposed project site, whether owned/operated by the applicant or another licensee. To the extent that the project site contains collocated transmitters from multiple operators, the RF exposure compliance report must evaluate all the transmitting antennas that may cause cumulative emissions.

5. Retain an independent RF engineer: Telecom applications contain highly technical information which neither the staff nor the County's decision makers are equipped to fully understand. Retain an independent RF engineer selected by the county and paid for by the applicant to assess the project's RF exposure levels and the accuracy of propagation maps. In addition, require the RF engineer to carry out periodic post-installation measurement of the intensity of RF radiation from cell towers to provide the County with reliable data on going compliance with the FCC's maximum NEIR exposure guidelines.

6. Alternative Site Analysis: *(Note: Although this section is similar to the current ordinance and Ad Hoc Committee's recommended update, it contains some additional items for consideration.)*

For applications not subject to Section 6409 (Spectrum Act), provide a detailed written analysis that describes how the proposed wireless facility complies with all the applicable requirements in the Sonoma County Municipal Code, and all the alternative locations and designs considered before submitting this application. The analysis shall include all the following required information and/or materials:

- a) Street-level map that shows the general geographic area surrounding the proposed location annotated to show:
 - all existing wireless facilities within the relevant geographic area
 - the search ring used for this particular project
 - all locations for each alternative considered for this particular project
- b) For each alternative site considered, a detailed written description that includes, without limitation, all the following: the nearest physical address; zoning district designation for the nearest private property; support structure type considered; concealment elements/techniques considered; and overall height and achievable antenna centerline height.
- c) The factual reasons why the applicant considered the potential alternative site location and/or design to be unacceptable, infeasible, unavailable or not in accordance with the development standards in the Sonoma County Municipal

Code (SCMC). This explanation must include a meaningful comparative analysis and such technical information and other factual justification as are necessary to document the reasons why each alternative is unacceptable, infeasible, unavailable or not as consistent with the development standards in the SCMC. Conclusory statements that a particular alternative is unacceptable, infeasible, unavailable or not in accordance with the development standards in the SCMC shall be deemed incomplete.

- d) For each alternative site within the search ring, signal propagation maps in scale with the street level map that show current and predicted service coverage in the area for all active frequencies in RSRP (or other relevant signal level or quality indicator) with and without the alternative site and with a legend that describes the objective signal levels in dBm that correspond to any colors used to depict signal levels on such propagation maps. The signal propagation maps required must be directly comparable with the signal propagation maps submitted to show before-and-after service from the applicant's proposed site.

7. Electrical and Structural Safety Information: The following engineering documents prepared by a California licensed Professional Engineer shall be included in the application:

- a) A short circuit and coordination study ("SCCS") calculated pursuant to the IEEE 551-2006: Recommended Practice for Calculating AC Short-Circuit Currents in Industrial and Commercial Power Systems or the latest version of that standard. The study must demonstrate the protection devices will ensure the equipment enclosure will not be breached. The SCCS must include analysis of Voltage Transient Surges due to contact of conductors of different voltages;
- b) a one-line diagram of the electrical system;
- c) Voltage Drop & Load Flow Study;
- d) Load Calculation;
- e) Panel Directories;
- f) A plot plan showing the location of the mounting structure including address, or structure designation, or GPS location on the front sheet;
- g) A plot plan showing the location of the service disconnecting means; and
- h) An elevation drawing of the equipment and the service disconnecting means.

8. Revise Cell Tower Setbacks in § 26C-325-.7(6): Delete existing setbacks related to dwelling units and revise setback standards of [Section 26C-325.7](#) (j)2. a. (b) 1. Consider requiring cell towers be setback a minimum of twenty percent of the tower height from all property lines and a minimum of 300 ft from any dwelling, school, hospital, daycare, public trail, park or public outdoor recreation area.

Sample Telecommunications Facilities Application Checklists

Several California jurisdictions have adopted telecommunications ordinances which provide their communities with excellent cellphone connectivity protecting health, property values and aesthetics while complying with the Telecommunications Act of 1996 (TCA) and FCC regulations. An essential component of these ordinances is a comprehensive telecommunications facilities application checklist which ensures that all relevant information is submitted by the provider.

Petaluma

<https://cityofpetaluma.org/documents/wireless-telecommunications-facility-permit-application-checklist/>

Sebastopol

<https://sebastopol.municipal.codes/SMC/17.130>

Malibu

https://www.malibucity.org/DocumentCenter/View/28468/PLN-WP_WRP-Submittal-Checklist

San Diego

<https://www.sandiego.gov/development-services/forms-publications/information-bulletin/536#instructions>

Contra Costa County

<https://www.contracosta.ca.gov/DocumentCenter/View/41331/Requirements-for-Wireless-Facility-Applications-PDF>

[1] Sonoma County's Telecom Application Checklist is not readily available to the public. Accessing this public document at the PRMD's website is conditional on providing detailed information from the representative of a telecom provider or property owner seeking a permit for a communications facility.

Cordially,
Sidnee Cox & Paul-André Schabracq
Co-Directors EMF Safety Network



EMFSafetyNetwork.org

PO Box 342, Windsor, CA 95492

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Site Plan

All plans must be legible, drawn to scale and include a north arrow, bar scale, project name/applicant, name of preparer, date prepared and date of any revisions. Preparation of the required site plan by a draftsman, architect, landscape architect or engineer is strongly recommended. Site plans must include, at a minimum, the information required on the [Site Plan Requirements for Planning Applications \(PJR-129\)](#). If the existing site is to be significantly modified by the proposed project (i.e. removal of existing buildings, extensive grading and removal of vegetation), both an existing site plan and a proposed site plan must be submitted.

Architectural plans

The Architectural plans must include elevations of the proposed tower and identify the type, materials and color of the proposed telecommunication tower. Exterior colors and materials should be local earth tones blending with the existing natural or built surroundings and have a low reflectivity value.

All mechanical equipment, exterior lights, loading and maintenance areas, and other exterior structures or uses must be shown on these plans. A cross-section is required for each structure showing the location of natural grade underneath the structure; the building's height must be identified on the section (measured from the average of the highest and lowest points of the lot covered by the structure to the topmost point of the roof). If there will be extensive grading work, please also include civil drawings. If modifying the height of an existing facility, provide an analysis of the silhouette and height changes as required to demonstrate compliance with federal standards for minor modifications.

Property owner authorization

This can be a lease agreement or letter of authorization.

Preliminary grading plans

The preliminary grading plan must indicate existing and proposed contours across the building site and the limits of grading. Existing contours must be shown with light or dashed lines and proposed contours must be shown with darker solid lines. The amount of proposed excavation and fill in cubic yards and the location of proposed deposition and borrow sites for each major element of the project must be indicated. The limits of grading

and the total area of disturbance for the proposed project must be clearly delineated. The grading plan must be drawn at the same scale as the site plan. The total amount of any off-haul must be identified in cubic yards and the location of the deposition. Identify the location and square footage of existing wetlands, waterways and drainage and proposed areas for storm water treatment.

Visual analysis

A full visual analysis must be submitted consistent with the [Sonoma County Visual Assessment Guidelines](#). The visual analysis may include photo montage, field, mock-up, or other techniques, should be prepared by or on behalf of the applicant which identifies the potential visual impacts, at design capacity, of the proposed facility. Facility towers, antennas and other structures and equipment are required to be located, designed, and screened to blend with the existing natural or built surroundings so as to minimize visual impacts and to achieve compatibility with neighboring residences and the character of the community to the extent feasible considering the technological requirements of the proposed telecommunication service. Additionally, potential visual impacts upon nearby public use areas such as parks or trails should be minimized.

Radio frequency (RF) emissions analysis

Demonstrate that the proposed facility will comply with the most current standard governing the limitation of human exposure to nonionizing electromagnetic radiation (NIER) used by the Federal Communications Commission (FCC) by submitting any of the following:

- An FCC license or construction permit that the FCC has accepted the applicant's certification that the facility meets the FCC standard;
- Evidence that the FCC has categorically excluded the applicant from demonstrating compliance with the FCC standard; or
- An independent analysis by or on behalf of the applicant which demonstrates that the facility will comply with the FCC standard. The calculations, measurements, and all related methods utilized to determine compliance must be consistent with FCC policies and procedures.

Coverage map(s)

Provide one coverage map per service type the application proposes to address (e.g., indoor, outdoor, in-vehicle, commercial).

Alternatives analysis

Provide an analysis on alternative site(s) and design(s) which demonstrates there is no other technologically feasible method of providing the needed service that would result in fewer or less severe environmental impacts. The alternatives analysis should include a mix of service strategies which incorporate existing, attached and/or other freestanding facilities. Provide one coverage map per alternative. The analysis should also offer clear tradeoffs involving:

- the level of service provided
- number of potential indoor customers and potential customers in transit
- the number of towers
- variety in tower heights and silhouettes
- potential visual impacts
- residential proximity and compatibility
- proximity to service area
- other applicable environmental impacts

At-cost reimbursement form

An at-cost agreement is required to provide a minimum fee and deposit sufficient to cover the cost of staff work on the project. Deposits must be maintained to cover staff costs or work may be halted on the project. Upload [this document](#) with the property owner's signature. Ensure that the owner reads this carefully before signing.

From: [Jennifer LaPorta](#)
To: [Doug Bush](#); [Ross Markey](#)
Subject: Sonoma County Telecom Ordinance update
Date: Friday, April 3, 2026 3:00:30 PM

EXTERNAL

Dear Mr. Bush, Project Planner for the PRMD,

these are my suggestions for the ordinance update:

- 1) Since the PRMD already effectively sends snail mail notices to residents and property owners within 1,000 feet radius of a proposed project, although the current ordinance only says it must be 300 feet, please update the ordinance to reflect the currently used **1,000 feet radius**.
- 2) Ensure this snail mail notice is at least **4 x 7" in size**
- 3) Ensure this snail mail notice is both in **English and Spanish**
- 4) Make the **shot clock beginning and end date** known to these 1,000' radius residents via another snail mail notice. Explain what the "shot clock" means in this notice.
- 5) Ensure the RF compliance report is written by an **independent** RF engineer. Not one who primarily works for Telecom.
- 6) Ensure the proposed cell phone tower is a **minimum of 1,000 feet distance** from the property line of any residential property, school, hospital, daycare, public trail, park or public outdoor recreation area.
- 7) when there is **collocation (addition of antennae) or changes to the power output**, send another notice to 1,000' radius residents of this change with the details on number and direction of antennae, and power output. (even though there will be no public hearing) Because people will want to know if their new health symptoms are related to these changes.

Please make this email a part of the record.

Sincerely,
Jennifer LaPorta
Santa Rosa

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From: [Bob Kao](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting
Date: Monday, April 13, 2026 9:11:55 PM

EXTERNAL

Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

1. Independent coverage verification.
2. Codifying ridgeline protections in scenic areas.
3. Retaining Planning Commission review authority for telecom towers.

The Telecommunications Ad Hoc Committee's proposed updates include improvements — a stronger alternatives analysis, new decommissioning requirements, and a better application checklist. However, gaps exist that the Commission needs to address before recommending adoption.

Some examples of the gaps are included below:

1. Give the county the ability to independently verify coverage claims. The ordinance currently leaves the county entirely dependent on carrier-submitted data with no way to challenge it. On our own 155 Grandview application, the county planner reviewed Verizon's coverage maps and couldn't tell if any actual coverage improvement was occurring — noting it may just be about future congestion. Yet staff recommends against adding independent review. We're asking for a simple provision: when staff identifies questions about a coverage claim, the county can hire an independent RF engineer at the applicant's expense to evaluate it. This can be added to the application checklist so it doesn't create shot clock issues.
2. Protect our scenic ridgelines and panoramic views. The county's General Plan (Objective OSRC-2.2) calls for protecting ridges in Scenic Landscape Units and we're asking the Commission to codify what's already county policy, as well as add requirements for property value impact assessments, wildfire and wildlife safety plans, especially relevant given our fire history and the diesel generators the towers include.
3. Keep decision-making authority with the Planning Commission, not a single staff member. Staff proposes shifting telecom tower review to the Zoning Administrator — one person, appointed by the Permit Sonoma director. These are among the most impactful and permanent land use decisions the county makes. They deserve the scrutiny and public participation that only a multi-member commission provides.

Sincerely,

Bob Kao
350 Grandview Rd
Sebastopol, CA 95472

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From: [David Ashcraft](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Monday, April 13, 2026 4:26:49 PM

EXTERNAL

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers**
- **Require Property Value Impact Analysis**

The proposed ordinance requires no analysis of economic impact on surrounding properties. This gap persists despite the U.S. Department of Housing and Urban Development’s classification of cell towers as “hazards and nuisances,” HUD’s requirement that appraisers flag proximity to towers, and peer-reviewed research consistently documenting property value declines. A 2018 study in the Journal of Real Estate Finance and Economics found average declines of 2.46% within 0.72 km, rising to 9.78% for homes with a visible tower. A 2019 study found discounts of up to 7.6% within 1,500 feet. For properties in Sonoma County’s rural west county — where home values are closely tied to scenic views and agricultural character — the impacts are likely at the upper end of these ranges.

Please include the following language:

“For any freestanding commercial telecommunications facility requiring a use permit in DA, LIA, LEA, AR, RR, R1, R2, or R3 districts, the applicant shall submit a property value impact analysis prepared by a California-licensed real estate appraiser. The analysis shall evaluate the potential impact on property values for all residential properties within 1,500 feet of the proposed facility, accounting for tower visibility, height, design, and proximity. The decision-making body shall consider the property value impact analysis as a factor in determining whether the proposed facility is compatible with the character of the community and the welfare of the public.”

Thank you,

David Ashcraft

David Ashcraft, Broker / Founder
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Vintroux Real Estate

#01298680 | www.vintroux.com

707.634.7796 | david@vintroux.com

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From: [Alex Talon](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 4:18:03 AM

EXTERNAL

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- Independent coverage verification,
- Codifying ridgeline protections in scenic areas,
- Retaining Planning Commission review authority for telecom towers.

Thank you,

Alexi Talon

Sent from Alex's iPhone

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From: [Anderson Pugash](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 1:08:50 PM

EXTERNAL

To Whom it May Concern:

Below are my comments on the proposed Sonoma County Telecom Ordinance - File No. ORD26-0001.

I strongly support the following:

- Independent coverage verification,
- Codifying ridgeline protections in scenic areas,
- Retaining Planning Commission review authority for telecom towers.
- Removal of cell phone towers if they become obsolete

Please don't let our county be ruined by ill conceived cell towers that may go obsolete in the near future anyways. Keep sonoma beautiful!

Anderson Pugash

--

Anderson Pugash
The Flamingo Resort
Sound Meditation

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From: [Ellian Raffoul](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 2:27:36 PM

EXTERNAL

To Whom it May Concern:

Below are my comments on the proposed Sonoma County Telecom Ordinance - File No. ORD26-0001.

I strongly support the following:

- Independent coverage verification,
- Codifying ridgeline protections in scenic areas,
- Retaining Planning Commission review authority for telecom towers.
- Removal of cell phone towers if they become obsolete

Please don't let our county be ruined by ill conceived cell towers that may go obsolete in the near future anyways.

Keep Sonoma beautiful!

—
Best,

Ellian Raffoul
Photographer // [ELLIAN.co](#)
408.603.4393 // [@ellian.co](#)

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From: greg99pole@gmail.com
To: [PlanningAgency](#)
Cc: [Rebecca Hermosillo](#)
Subject: ORD 26-0001
Date: Tuesday, April 14, 2026 10:17:11 AM

EXTERNAL

Please forward these comments as appropriate re the proposed update of the telecommunication regulations.

After having participated as a staff member in preparation of the original ordinance and as a commissioner in multiple hearings on proposed cell tower applications, it's good to see the county making some needed changes. While the federal regulations place some strong pre-emptions on the county's authority in these applications, it's incumbent upon us to use what authority remains to the maximum practical effect. That usually means that there has been a fully vetted alternative site analysis.

Generally I support the suggestions in the comments submitted along with the original staff packet, particularly those that would expand the relative service capacities of the alternatives for comparison purposes. In addition I recommend that more emphasis be placed on the applicant's initial neighborhood outreach.

The ordinance should include a provision recommending that the applicant organize an initial meeting with concerned neighbors and groups prior to making the application. In addition the applicant should be required to fully document that all of the owners of property that may serve as an alternative site have been contacted and given several chances to respond. That documentation should include a detailed log with contact methods (phone and visits) and responses.

Thanks for your consideration
Greg Carr
Sonoma
Sent from my iPhone

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From: [Paul-Andre](#)
To: [PlanningAgency](#)
Subject: Proposed Revisions to the Wireless Facilities regulations Re: ORD26-0001
Date: Tuesday, April 14, 2026 11:17:48 AM
Attachments: [SoCo Telecom comments Final.pdf.pdf](#)

EXTERNAL

Hello Doug,

Please find attached EMF Safety Network's response to the proposed revisions to the Wireless Facilities regulations. It would be appreciated if you would include this in the packet that is delivered to the Planning Commissioners.

Cordially,

Paul-André Schabracq

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EMF SafetyNetwork.org
PO Box 342, Windsor, CA 95492



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April 13/2026

Dear Planning Commissioners,

Comments on Proposed Revisions to Sonoma County's Telecommunications Ordinance

We welcome the County's efforts to update the Telecommunications Ordinance. Specifically we appreciate the key priorities and objectives of the Planning Agency's Ad Hoc Committee with the goal of updating certain standards for the ordinance. For instance, the Ad Hoc Committee's proposed revisions include: (1) more structured alternatives and visual analysis of proposed cell tower sites, (2) clearly defined minimum alternatives for facility sites, (3) expanded design and height comparisons, (4) strengthened collocation analysis, (5) clearer trade-off analysis regarding reliability, height, number of structures, visual impact, environmental considerations, and compatibility with surrounding land uses, (6) decommissioning and removal standards, and (7) clearer language addressing Eligible Facilities Requests and exempt activities.

However, there is more the County can do to provide enhanced protection of scenic resources, property values, and the health and safety of the County's rural residential areas while still ensuring good wireless connectivity. We are proposing a number of additional revisions to the County's updated Telecommunications Ordinance as essential measures that are permitted by the FCC and federal regulations (TCA 1996). The following items are presented for your consideration:

- 1. Provide a revised Telecommunications Facility Application checklist** to all applicants and have it publically accessible on the Permit Sonoma website. This was not included in the packet.
- 2. Require a Pre-Submittal Conference:** The staff report of 2/26/26, page 4, states, *"The updated standards require structured and comprehensive analyses, encouraging applicants to conduct thorough research before filing... leading to higher quality proposals."* This encouragement should include a pre-submittal conference with County staff.
- 3. Community Meeting:** Applicants shall conduct a publicly noticed community meeting at least 2 weeks prior to the Planning Commission hearing date. All property owners 1000 ft. within of the boundaries of the subject parcel on which the applicant proposes the facility or modification should be notified.
- 4. Public Notice:** Public notice shall be given consistent with Cal. Gov't Code §§ 65090—65096 and mailed to owners within one thousand (1,000') feet radius of the real property that is the subject of the hearing pursuant to Cal. Gov't Code § 65091(a)(3). This notice shall also be given to the owners of at least ten (10) parcels, in addition to the parcel that is the subject of the hearing.

5. Independent Technical Review: Telecom applications contain highly technical information that requires subject matter expertise. The staff report dismisses the need for an Independent Technical Review regarding the gap in service verification. Equally important is the verification of FCC compliance with the FCC's *Maximum Permissible Exposure Levels* (Specific Absorption Rate - SAR). It is not enough for telecom to simply assert that the upgrade or collocation is not in excess of SAR levels. As technology changes, so does telecom's use of new spectrum and power levels for antennas. For instance, beam forming technology utilizing higher spectrum with increased power intensity is now being included on facilities.

The County can exercise oversight for verification of FCC compliance of Maximum Permissible Exposure (MPE) levels and deny and/or condition applications should MPE's from cell towers be exceeded at prescribed distances and height levels as determined by an independent technical review conducted by an electrical or RF engineer.

The staff report's suggestion that an independent RF engineer's assessment of the telecom application would add "an outside review step after an application is submitted" and it "could make it harder to meet those deadlines" is fallacious. The *Telecommunications Facility Application Checklist* could require an independent RF engineer's assessment of the veracity of the propagation maps and the anticipated RF exposure levels as part of a complete application. Other California jurisdictions have required an independent RF engineer review of cell tower applications.

An independent RF or electrical engineer's assessment of the documented specifications of antennas should become a requirement for freestanding commercial facilities -e.g. cell towers. Residents in proximity to a facility have a legal right to know what spectrum and radio frequency radiation power levels are being employed at these facilities. This information needs to be publicly accessible. The recommended requirements for a *RF Compliance Report* are provided in the Addendum below and should be included in the revised *Telecommunications Facility Application Checklist*.

6. Require all discretionary wireless applications be heard by the Planning Commission rather than the Zoning Administrator. Note that *Exhibit B Amendments to Sonoma County Code Chapter 2* removes Telecommunication Facilities from the Zoning Administrator's purview. Directing wireless applications primarily to the Zoning Administrator versus the Planning Commission limits different perspectives when evaluating proposed wireless applications while adding another costly layer to the appeal procedure.

7. Revise Proposed Cell Tower Setbacks: The proposed setbacks fail to provide adequate protection from the adverse impacts of cell towers on scenic corridors, ridgelines, and other visual resources, schools, medical facilities, property values and the health and safety of the County's rural residential population.

Specific changes requested to Amendments to Sonoma County Code 26:

a) Delete the following in F(4)(g): "Tower setbacks may be waived under any one (1) of the following circumstances: (1) The facility is proposed to be collocated onto or clustered with an existing, legally established telecommunication facility. (2) All of the owners of affected properties agree to the reduced setback. A property is considered affected if its dwelling unit lies within a distance equivalent to the required setback for the subject tower prior to reduction and the reduced setback would result in the tower being located closer to the dwelling unit than the above setback would otherwise allow."

b) Delete G(1): Applicability of Table states, “Where indicated by an asterisk, the director may allow these silhouette limits to be exceeded without requiring a zoning or use permit provided that the added silhouette would be effectively unnoticeable.” This gives the director unconstrained discretion to permit larger cell tower profiles without any objective standards or public review.

c) Add G(2): Add the DA District to the following: “Intermediate or major freestanding commercial telecommunication facilities in the AR, RR, R1, R2, and R3 districts may be approved only upon a finding that no technically feasible site or method exists in districts where such facilities are permitted outright.” The DA District contains a significant number of rural homes that deserve the same protections.

d) Require the following setbacks and height restrictions:

- No telecommunications facility shall be installed on an exposed ridgeline, school, medical facility, or on a location readily visible from a public trail, public park, designated scenic road, or other outdoor recreation area;
- No telecommunications facility that is readily visible from off site shall be installed closer than one-quarter mile from another readily visible uncamouflaged or unscreened telecommunications facility unless it is a collocated facility, situated on a multiple-user site, or blends with the surrounding existing natural and manmade environment in such a manner as to be effectively unnoticeable;
- Telecommunications Towers shall be set back at least 20 percent of the tower height from all property lines and at least 100 feet from any public trail, park, Laguna buffer setback, or property line;
- No commercial minor antenna greater than 35 feet in height and no major telecommunication facility may be installed within 75 feet of any property line of a parcel with a residential dwelling unit.
- Maximum Height: The height of an existing communication tower shall not be increased by an amount that would result in a violation of height restrictions for different zoning districts outlined in the Zoning Ordinance.

Recommended Additions to the Proposed Telecommunications Facilities Regulations

NEIR (Non Ionizing Electromagnetic Radiation) Compliance:

- A. A telecommunications facility shall not be sited or operated in such a manner that it poses, either by itself or in combination with other such facilities, a potential threat to public health. To that end no telecommunications facility or combination of facilities shall produce at any time power densities in any residential or inhabited area (*add to definitions*) that exceed the FCC or NEIR standard for human exposure, as amended from time to time.
- B. Initial compliance with this requirement shall be demonstrated for any facility within 400 feet of residential uses or sensitive receptors such as schools, churches, hospitals, day care centers, etc., and all broadcast radio and television facilities regardless of adjacent land uses, through submission, at

the time of application for the necessary permit or entitlement, of NEIR calculations specifying NEIR levels in the inhabited area where the levels produced are projected to be highest.

If these calculated NEIR levels exceed 80 percent of the NEIR standard as established in this ordinance, the applicant shall hire a qualified electrical or RF engineer licensed by the State to measure NEIR levels at said location after the facility is in operation. A report of these measurements and his/her findings with respect to compliance with the established NEIR standard shall be submitted to the Planning Director. The facility shall not commence normal operations until it complies with, or has been modified to comply with, this standard.

Proof of said compliance shall be a certification provided by the engineer who prepared the original report. In order to assure the objectivity of the analysis, the County may require, at the applicant's expense, independent verification of the results of the analysis.

- C. Every telecommunications facility within 400 feet of an inhabited area and all broadcast radio and television facilities shall demonstrate continued compliance with the NEIR standard.
- D. Within five years and every five years thereafter, a report listing each transmitter and antenna present at the facility and the effective radiated power shall be submitted to the Planning Director. If either the equipment or effective radiated power has changed, calculations specifying NEIR levels in the inhabited areas where said levels are projected to be highest shall be prepared. NEIR calculations shall also be prepared every time the adopted NEIR standard changes. In the case of a change in the standard, the required report shall be submitted within 90 days of the date said change becomes effective. FCC's NEIR standard established by this ordinance shall be grounds for revocation of the conditional use permit.

Defining Gap in Service:

The proposed revisions unreasonably allow the applicants to define what constitutes a gap in service without establishing accepted standards of measurement.

As determined by the County, adequate coverage means there is not a significant gap in coverage and sufficient network capacity exists to reasonably fulfill customer demand. "Significant gap" and "Sufficient capacity" will be assessed on a case-by-case basis.

Any claimed service coverage gap must be truly significant before a conclusion there is not adequate coverage. Context-specific factors will be used to assess the significance of alleged coverage gaps, including the nature and character of the area, the number of potential users in that area who may be affected by the alleged lack of service, whether facilities are needed to improve weak signals or to fill a complete void in coverage, whether gaps pose public safety risks, and the effects of gaps on roads, highways, railways, and commercial districts.

Other factors include whether the alleged gap covers well-traveled roads on which customers lack roaming capabilities and drive tests. Inadequate or unreliable in-building service can be sufficient to show the existence of a significant gap in coverage, as can a gap in a provider's in-home coverage that consists of more than a few isolated pockets of inadequate in-home coverage. A wireless carrier's coverage shall not be deemed inadequate simply because the frequency or frequencies at which its customers are using its services are not the most preferred frequency of the wireless carrier.

Effective Prohibition & Basis for Denial of Telecommunication Facilities Applications:

1. **Significant gap:** Any determination of whether an applicant has established, or failed to establish, both the existence of a significant gap and whether its proposed installation is the least intrusive means of remedying such gap, shall be based upon the preponderance of the evidence.
2. **Aesthetics and impact on Neighborhood Character:** For discretionary permits the County reserves the right to deny an application based on aesthetic or other locational considerations such as unacceptable impact on the characteristics of the impacted neighborhood or any other "safe harbor" allowed by 47 U.S.C. §§253(b)-(c) and/or 332(c)(7)(B)(i)(II) even if the applicant has proven that there is a significant gap or lack of adequate capacity and the proposed location is the least intrusive alternative.
3. **Dropped calls:** For claimed capacity shortfalls in an area that has coverage, the applicant must demonstrate through independently-verifiable data and analysis that users are consistently experiencing dropped voice calls (in contrast to dropped sessions involving non-voice communications) at an unacceptable level during peak periods, or user devices are consistently denied access to the network due to lack of overall capacity at peak periods.
4. **Signal strength:** If the applicant relies on signal strength data (whether network recorded or through drive tests) to demonstrate a lack of coverage or in sufficient capacity the applicant must disclose all underlying data, its thresholds for acceptable quality in such fashion that all claims and conclusions are independently verifiable.

The County strongly encourages all applicants to use methods consistent with the FCC rules governing provider reports and mapping data in 47 C.F.R. Part 1, Subpart V (§§ 1.7000 – 1.7010).

The proposed revisions do not address the potential liabilities to the County of telecommunications facilities. The suggested language below addresses this:

1. **Collocation:** Owners of all approved facilities shall be required to agree to allow future co-location by other carriers, and to provide an efficient process for handling co-location requests.
2. **Post-Installation Certification:** Within 60 calendar days after the permittee commences full, unattended operations of the wireless facility approved or deemed-approved, the permittee shall provide the Director with documentation reasonably acceptable to Director that the wireless facility has been installed and constructed in strict compliance with the approved construction drawings and photo simulations. Such documentation shall include without limitation as-built drawings, GIS data, and site photographs.
3. **Insurance required:** The permittee and each owner or operator of an antenna on the personal wireless services facility, shall obtain, and at all times relevant to this permit maintain, insurance policies, issued by an insured authorized to do business in the State of California and reasonably acceptable to the County, at least as broad as follows:
4. **Commercial General Liability Insurance:** The permittee shall procure and maintain at its expense or cause its contractor or subcontractor to procure and maintain throughout the term of this permit, commercial General Liability ("CGL") insurance on an "occurrence" basis, with limits not less than \$2,000,000 per occurrence per wireless carrier or \$4,000,000 per wireless carrier in the aggregate. If a general aggregate limit applies, either the general aggregate limit

shall apply separately to this project location or the general aggregate limit shall be twice the required occurrence limit. CGL insurance must include coverage for the following: Bodily Injury and Property Damage; Personal Injury/Advertising Injury; Premises/Operations Liability; Products/Completed Operations Liability; Aggregate Limits that Apply per Project; Explosion, Collapse and Underground ("UCX") exclusion deleted; Contractual Liability with respect to the permit; Broad Form Property Damage; and Independent Consultants Coverage. The policy shall contain no endorsements or provisions limiting coverage for (i) contractual liability; (ii) cross liability exclusion for claims or suits by one insured against another; (iii) products/completed operations liability; (iv) bodily injury or damage from RF exposure at levels exceeding the FCC limits; or (v) contain any other exclusion contrary to the conditions in this permit.

5. **Environmental Pollution Liability Insurance:** The permittee shall procure and maintain at its expense or cause its contractor or subcontractor to procure and maintain throughout the term of this permit, Contractors Pollution Liability Insurance including contractual liability coverage to cover liability and legal expenses arising out of cleanup, removal, storage, or handling of hazardous or toxic chemicals, materials, substances, or any other pollutants by the permittee or any subcontractor resulting from pollution conditions associated with the personal wireless services facility in an amount not less than \$1,000,000 each occurrence combined single limit for bodily injury and property damage.
6. **Umbrella Policy:** If an umbrella or excess liability insurance policy is used to satisfy the minimum requirements for insurance coverage listed above, the umbrella or excess liability policies shall provide coverage at least as broad as specified for the underlying coverage and covering those insured in the underlying policies. Coverage shall be "pay on behalf," with defense costs payable in addition to policy limits. Permittee shall provide a "follow form" endorsement or schedule of underlying coverage satisfactory to the County indicating that such coverage is subject to the same terms and conditions as the underlying liability policy
7. **Endorsements:** The relevant policy(ies) shall name the County, its elected/appointed officials, commission members, officers, representatives, agents, volunteers and employees as additional insureds. The permittee shall use its best efforts to provide thirty (30) days prior notice to the County of the cancellation or material modification of any applicable insurance policy.
8. **Verification of Coverage.** Permittee shall furnish the County with original certificates and amendatory endorsements or copies of the applicable policy language providing the insurance coverage required herein. All certificates and endorsements are to be received and approved by the County before any work commences. However, failure to obtain required documents prior to the work beginning shall not waive the Licensee's obligation.

Conclusion:

After careful review, we assert that the proposed staff revisions do not provide enough adequate safeguards and protections from the rapidly expanding wireless technologies which are permitted by the FCC and the TCA.

Notably:

- The revisions further constrain public knowledge of and participation in the application review process by not requiring community meetings; limiting public notice to a 300 ft radius vs. 1,000 ft; and utilizing the Zoning Administrator to review and approve applications.
- Rejecting independent expert review of the highly technical wireless applications by electrical or RF engineers;

- Eliminating efforts to ensure compliance with the FCC’s NEIR limits for human exposure to radio frequency radiation;
- Maintaining the existing cell tower setbacks which offer minimal mitigation of their impacts, ignoring the need for additional setbacks from sensitive uses such as residential areas, schools, medical facilities, public trails, and recreation areas;
- Permitting the telecommunications industry to define what constitutes a significant gap in service when other reputable measures permitted by the FCC exist and have been used by California jurisdictions;
- Not addressing the County’s potential liabilities of telecommunications facilities by not requiring insurance.

Thank you for your consideration regarding these important revisions to the Telecommunications Ordinance.

Cordially,
 Sidnee Cox & Paul-André Schabracq
 EMF Safety Network

ADDENDUM

Recommended RF Compliance Report:

The recommended requirements for a *RF Compliance Report* are summarized below and should be included in the revised *Telecommunications Facility Application Checklist*. The report would certify whether the freestanding commercial facilities – cell towers, including collocated facilities, and any cumulative RF emissions from nearby cell towers, will comply with applicable federal NIER (Non-Ionizing Electromagnetic Radiation) human exposure standards and limits.

This report shall include the following:

- a) the frequency, actual or maximum power levels in watts effective radiated power (ERP), and the actual or maximum transmitting channels for all existing and proposed antennas at the site;
- b) the location and orientation of all transmitting antennas;
- c) the boundaries of areas with RF exposures whether individually or cumulatively in excess of the controlled/occupational limit (as defined by the FCC). Each such boundary must be clearly marked and identified for every transmitting antenna at the proposed project site, whether owned/operated by the applicant or another licensee. To the extent that the project site contains collocated transmitters from multiple operators, the RF exposure compliance report must evaluate all the transmitting antennas that may cause cumulative emissions;
- d) the actual frequency, actual or maximum power levels (in watts effective radiated power (ERP), and the actual or maximum transmitting channels for all existing and proposed antennas at the site.
- e) the accuracy of the propagation maps provided by the applicant;

Exhibits shall include:

- the location and orientation of all transmitting antennas;
- the boundaries of areas with RF exposures (whether individually or cumulatively) in excess of the uncontrolled/general population limit (as that term is defined by the FCC);
- the boundaries of areas with RF exposures (whether individually or cumulatively) in excess of the controlled/occupational limit (as that term is defined by the FCC).

From: [Samantha Bohlke](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 3:38:29 PM

EXTERNAL

Hello Planning Agency,

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

The Telecommunications Ad Hoc Committee's proposed updates include improvements — a stronger alternatives analysis, new decommissioning requirements, and a better application checklist, however gaps exist that the Commission needs to address before recommending adoption.

Some examples of the gaps are included below:

1. Give the county the ability to independently verify coverage claims. The ordinance currently leaves the county entirely dependent on carrier-submitted data with no way to challenge it. On our own 155 Grandview application, the county planner reviewed Verizon's coverage maps and couldn't tell if any actual coverage improvement was occurring — noting it may just be about future congestion. Yet staff recommends against adding independent review. We're asking for a simple provision: when staff identifies questions about a coverage claim, the county can hire an independent RF engineer at the applicant's expense to evaluate it. This can be added to the application checklist so it doesn't create shot clock issues.
2. Protect our scenic ridgelines and panoramic views. The county's General Plan (Objective OSRC-2.2) calls for protecting ridges in Scenic Landscape Units and we're asking the Commission to codify what's already county policy, as well as add requirements for property value impact assessments, wildfire and wildlife safety plans, especially relevant given our fire history and the diesel generators the towers include.
3. Keep decision-making authority with the Planning Commission, not a single staff member. Staff proposes shifting telecom tower review to the Zoning Administrator — one person, appointed by the Permit Sonoma director. These are among the most impactful and permanent land use decisions the county makes. They deserve the

scrutiny and public participation that only a multi-member commission provides.

Thank you,

Samantha

Samantha Bohlke

Realtor/ North Bay Specialist

Jennifer Rosdail Real Estate Team

a KW Advisors Partner

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From: [Therese Jennings](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance - April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 8:19:52 AM

EXTERNAL

Hello from West Sonoma County ~

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you,

Therese E. Jennings

200 Grandview Road, Sebastopol, CA 95472

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From: [Gary Howard](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Tuesday, April 14, 2026 9:21:00 PM

EXTERNAL

To whom it may concern,

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001. I am a resident of Grandview road who will be very negatively impacted by the proposed cell tower at 155 Grandview Rd. The system we have in place for processing and approving these projects is severely lacking and needs improvement. I have read and strongly agree with the points stated in a letter submitted by Maggie Sokolov and David Ashcraft. All of the points they raise are simple common sense. I urge whoever is reading my comments to take the time to read David and Maggie's letter.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you,

Gary Howard

10396 Deblyn Lane

Sebastopol, CA 95472

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From: [Don Cambou](#)
To: [PlanningAgency](#)
Subject: File No. ORD26-001 review
Date: Wednesday, April 15, 2026 2:44:04 PM

EXTERNAL

Dear Planning Commissioners,

Since I live in the viewshed of the proposed Verizon telecommunication tower on 115 Grandview Road, I've been motivated to learn about the Sonoma County Planning Commission's guidance and proposed new guidance regarding these structures. Below, I've enumerated three major concerns that I feel need further attention in the Commission's revised guidelines.

1. Telecommunication towers can greatly influence the property values of homeowners near them. Many consider them a blight on pastoral viewsheds, especially in Sonoma County. Therefore, knowledgeable, independent, California-licensed real estate appraisers should provide assessments of the impact of view degradation for all home values that would be affected by proposed telecommunication towers. Furthermore, I believe telecommunication tower owners should be held accountable for all property values lost in said viewsheds.

(I attended the Jan. 26, 2026 meeting hosted by Verizon, and heard the Verizon representative offer the opinion that there should be NO loss in property values if an 85 foot telecommunication tower were to be placed in an apple orchard at 115 Grandview Road. I would suggest that he was ignorant at best, or lying at worst.)

2. Independent, RF trained engineers should be required to verify any proposed telecommunication tower owner's coverage gap claims. Currently, it appears that the Planning Commission must rely on the proposed tower owner's "word" that such a tower is necessary.

3. Proposed telecommunication towers should be limited to 10 year permits, with removal bonds. These permits could be renewable, although the value of the removal bonds could increase at such time.

Furthermore, I've read the long "Telecommunication Ordinance Update" letter to the Commission from Maggie Sokolov and David Ashcraft. I appreciate the depth of their research, and fully support their conclusions.

Thank you for your consideration,
Don Cambou
515 Grandview Road, Sebastopol

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From: [Elsa Sze](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Wednesday, April 15, 2026 12:59:10 PM

EXTERNAL

I am writing to submit a public comment on the proposed Sonoma County Telecom Ordinance (File No. ORD26-0001). As a resident of Sebastopol, I support the following provisions:

- Independent verification of coverage needs to ensure new infrastructure is justified
- Codification of ridgeline protections in scenic and environmentally sensitive areas
- Retention of Planning Commission review authority for telecom tower approvals

These measures are important to balance connectivity needs with environmental stewardship and community oversight.

Thank you for your consideration.

Sincerely,

Elsa Sze

Resident of Sebastopol

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From: [lisa.pompelli](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance April 16, 2026 meeting - File No. ORD26-0001
Date: Wednesday, April 15, 2026 10:55:28 AM

EXTERNAL

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you,

Lisa Pompelli

515 Grandview Rd. Sebastopol

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From: [Maggie Sokolov](#)
To: [PlanningAgency](#); [Eric Koenigshofer](#); [Doug Bush](#)
Cc: [Levan King Cranston](#); [Lynda Hopkins](#); [Che Casul](#); [David Ashcraft](#)
Subject: Public comment: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Wednesday, April 15, 2026 9:43:38 AM
Attachments: [Public Comment ORD26-0001, 04-15-2026.pdf](#)

EXTERNAL

I would like to comment on the proposed updated **Sonoma County Telecom Ordinance - File No. ORD26-0001**.

I support the following:

- Independent coverage verification,
- Codifying ridgeline protections in scenic areas, already part of the General Plan,
- Property value impact analysis,
- Retaining Planning Commission review authority for telecom towers.

I've attached a more detailed public comment letter with our thoughts and concerns for the Commissioners and for the record ahead of the meeting. The letter outlines the key points we feel are important to address as this ordinance moves forward.

Thank you,

Maggie Sokolov
+1 415-793-7593
maggie.sokolov@gmail.com

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April 15, 2026

Sonoma County Planning Commission

Permit Sonoma

2550 Ventura Avenue

Santa Rosa, CA 95403

PlanningAgency@sonoma-county.org

Re: File No. ORD26-0001 — Telecommunications Ordinance Update

Dear Commissioners and Staff:

Thank you for the opportunity to comment on the proposed amendments to Sonoma County's telecommunications ordinance. We appreciate the work of the Telecommunications Ad Hoc Committee and Permit Sonoma staff in modernizing regulations that have been in place since 1996. The strengthened alternatives analysis, decommissioning framework, and updated application checklist represent meaningful progress.

We write to respectfully request that the Planning Commission address three areas where the proposed ordinance leaves critical gaps. These recommendations are grounded in existing county policy, the factual record of recent proceedings, peer-reviewed research, and peer jurisdiction practice. None would prohibit wireless service or conflict with federal law.

1. Independent Technical Review of Coverage Claims

The staff report acknowledges that Permit Sonoma staff lack the expertise to evaluate coverage gap analyses submitted by telecom applicants, and that commissioners have questioned the reliance on applicant-submitted materials. Staff explored the option of independent third-party review but recommends against it, citing concerns about federal legal constraints, limited practical benefit, and shot clock timing.

The need for this tool is not theoretical. In the pending application for 155 Grandview Road (UPE25-0048), the assigned project planner reviewed Verizon's coverage maps and wrote that "it's not clear from looking at this map that any change in coverage is occurring" and asked whether the project is intended to address "future coverage congestion." Verizon's own RF justification confirms the facility is "designed to offload existing sites" experiencing "high data usage" with traffic loads "3 times the normal operating condition." Under federal telecommunications law, the county is required to approve towers to address significant gaps in coverage but is not obligated to approve towers solely to relieve network congestion or add capacity.

When a planner identifies this kind of concern but lacks the technical expertise to resolve it, the county needs a mechanism to obtain an independent answer. Without one, the county cannot produce the contrary evidence needed to rebut an applicant's prima facie coverage gap claim. This is the dynamic that undermined the Board of Zoning Adjustments' denial of the 9300 Mill

Station Road application — the BZA found no service gap existed but was overruled on appeal because the county had no independent evidence supporting that finding.

We propose a practical middle ground that addresses each of staff's stated objections. Rather than requiring mandatory independent review for every application, the ordinance should authorize discretionary review when staff identifies specific concerns. Additionally, independent RF review should be added to the application completeness checklist as a conditional item triggered by staff questions. Since the checklist is an administrative tool maintained outside the code — and the staff report itself notes it “can be refined over time based on implementation experience” — this creates no shot clock risk because the clock does not start until an application is deemed complete.

We recommend the following language be added as a new subsection (F)(4)(h) or standalone subsection (J):

“Independent Technical Review. Where staff identifies material questions, inconsistencies, or ambiguities in the applicant’s coverage gap analysis, propagation maps, or technical justification — including but not limited to questions regarding whether the claimed service need reflects a significant gap in coverage as distinguished from a gap in capacity or bandwidth — the decision-making body or the Planning Director may direct that an independent technical review be conducted by a qualified RF engineer retained by the County at the applicant’s expense. The scope of such review shall be limited to the specific questions identified by staff and may include in-field signal measurement, propagation model verification, or evaluation of whether alternative technologies or configurations could address any verified gap. The independent reviewer’s report shall be made part of the public record and presented to the decision-making body prior to action on the application. The cost of such review shall be deposited by the applicant prior to initiation and shall be included as a component of the application’s at-cost processing fees. Nothing in this subsection shall be construed to require independent review for every application or to expand the County’s authority beyond what is permitted under applicable federal law.”

This provision is not mandatory for every application. It is triggered only when staff identifies a specific concern. It is funded through the existing at-cost fee structure. It creates no shot clock problems. It simply gives the county a tool it currently lacks — one the county’s own planner has already demonstrated the need for.

2. Protecting Community Character: Codify SR District and Scenic Landscape Unit Protections, Property Values, Wildfire Safety, and Wildlife

A. Codify General Plan Ridgeline Protections in Scenic Landscape Units

The staff report cites General Plan Objective OSRC-2.2: “Protect the ridges and crests of prominent hills in Scenic Landscape Units from the silhouetting of structures against the skyline.” It also cites Goal OSRC-2: retaining “the largely open, scenic character of important Scenic Landscape Units.” These are adopted county policies already part of wider county legislation.

The existing SR District overlay (Sec. 26-64-040) provides heightened review for facilities in scenic resource areas, and the proposed ordinance retains those provisions. However, neither

the current code nor the proposed amendments translate Objective OSRC-2.2 into enforceable development standards. The objective specifically addresses ridgeline silhouetting, yet the ordinance contains no prohibition or heightened standard for ridgeline siting. At Mill Station, staff's subjective visual assessment classified a 70-foot tower screened by 15–25 foot vegetation as merely “co-dominant” with the landscape. Without objective standards, the same outcome is likely for an 85-foot tower on the Grandview Road ridge — a site confirmed by staff to be within a Scenic Landscape Unit.

We recommend adding the following standard, applicable within SR-designated areas:

“Consistent with General Plan Objective OSRC-2.2, no free-standing commercial telecommunication facility within an SR Combining District shall be sited where it would silhouette against the skyline as viewed from any public road, trail, park, or outdoor recreation area within two miles, unless the applicant demonstrates that: (a) no alternative site avoids ridgeline or skyline placement; (b) the facility design will be effectively unnoticeable through concealment, placement below the ridgeline, or screening; and (c) a field mock-up or balloon test at the proposed height has been conducted with photographic documentation from all affected public viewpoints.”

This is not a new restriction. It is the translation of an adopted General Plan objective into the development standards that a zoning ordinance is designed to implement. Peer jurisdictions including Petaluma, Monterey County, and Chino Hills have adopted comparable ridgeline protections for telecommunications facilities.

B. Require Property Value Impact Analysis

The proposed ordinance requires no analysis of economic impact on surrounding properties. This gap persists despite the U.S. Department of Housing and Urban Development's classification of cell towers as “hazards and nuisances,” HUD's requirement that appraisers flag proximity to towers, and peer-reviewed research consistently documenting property value declines. A 2018 study in the Journal of Real Estate Finance and Economics found average declines of 2.46% within 0.72 km, rising to 9.78% for homes with a visible tower. A 2019 study found discounts of up to 7.6% within 1,500 feet. For properties in Sonoma County's rural west county — where home values are closely tied to scenic views and agricultural character — the impacts are likely at the upper end of these ranges.

We recommend:

“For any freestanding commercial telecommunications facility requiring a use permit in DA, LIA, LEA, AR, RR, R1, R2, or R3 districts, the applicant shall submit a property value impact analysis prepared by a California-licensed real estate appraiser. The analysis shall evaluate the potential impact on property values for all residential properties within 1,500 feet of the proposed facility, accounting for tower visibility, height, design, and proximity. The decision-making body shall consider the property value impact analysis as a factor in determining whether the proposed facility is compatible with the character of the community and the welfare of the public.”

C. Wildfire Safety Requirements

Sonoma County has experienced catastrophic wildfires in 2017, 2019, and 2020. The proposed ordinance contains no fire safety provisions despite the fact that telecommunications facilities

typically include diesel generators, fuel storage, and electrical equipment. Monopine designs incorporate thousands of pounds of plastic material that can ignite and generate toxic smoke. The pending 155 Grandview application includes a 30-kilowatt diesel generator with a 164-gallon fuel tank on agricultural land. We recommend:

“All applications for telecommunications facilities in State Responsibility Areas or Local Responsibility Areas classified as High or Very High Fire Hazard Severity Zones shall include a fire safety plan prepared by a California-licensed fire protection engineer or reviewed by the local fire authority. The plan shall address: (a) vegetation management and defensible space consistent with PRC 4291; (b) fire-resistant materials and construction standards; (c) generator fuel storage and containment; (d) facility access for fire suppression equipment; and (e) whether the facility or its access road would impede any identified evacuation route.”

D. Wildlife and Biological Resource Impact Assessment

The current ordinance requires that “significant adverse impacts on biotic resources, including any threatened, rare or endangered species, shall be mitigated.” This language is contained in Sec. 26-88-130, which the proposed amendments repeal and replace. The new Sec. 26-30-120 does not carry forward explicit biotic resource protection language. Telecommunications towers pose documented risks to wildlife, particularly avian species — the U.S. Fish and Wildlife Service identifies communication towers as a significant source of bird mortality. The 155 Grandview site is adjacent to the Madeleine Sone Wildlife Preserve along Furlong Road and within a migratory corridor between coastal and inland habitats. We recommend:

“All applications for freestanding commercial telecommunications facilities shall include a biological resource assessment evaluating potential impacts on wildlife, including but not limited to avian collision risk, habitat disruption, and proximity to wildlife preserves, riparian corridors, or known habitat for threatened, rare, or endangered species. The assessment shall be prepared by a qualified biologist and shall identify all feasible mitigation measures, which may include facility design modifications to reduce collision risk, seasonal construction restrictions, and vegetation management plans. Significant adverse impacts on biotic resources shall be mitigated to the maximum extent feasible.”

3. Retain Planning Commission Review Authority for Telecommunications Facilities

The staff report proposes shifting primary review authority for telecom use permits from the Planning Commission to the Zoning Administrator — a single staff designee who would hear applications individually, with discretion to refer “controversial” projects to the Commission. We respectfully urge the Commission to reject this proposal.

Telecommunications towers are among the most consequential land use decisions the county makes. They are permanent or semi-permanent structures, often 50 to 130 feet tall, sited in scenic agricultural landscapes where they affect property values, community character, and visual resources for decades. The recent Mill Station proceeding required four public hearings with extensive community participation before the Board of Zoning Adjustments reached its denial. A single Zoning Administrator hearing cannot replicate that level of scrutiny or public engagement.

The staff report notes that of 183 discretionary telecom applications since 1995, only three were appealed. But this statistic reflects a 30-year period when most applications were less controversial and community awareness of tower impacts was lower. The Mill Station and 155 Grandview applications demonstrate that community engagement on these issues is intensifying, not diminishing. Delegating these decisions to a single staff designee at precisely the moment when public participation is increasing would undermine public confidence in the process.

There is also a structural concern. The Zoning Administrator is an employee designated by the Director of Permit Sonoma. While the ordinance provides that the ZA acts independently in quasi-adjudicative functions, the practical reality is that the ZA works within the same department that processes the applications and prepares the staff reports recommending approval. A multi-member commission provides the independence, diversity of perspective, and public accountability that these high-impact decisions require.

If the Commission determines that some delegation is appropriate for lower-impact facilities, we recommend the following guardrails: the ZA should only review minor freestanding facilities of 50 feet or under; any facility in an SR District, any facility exceeding 50 feet, and any application generating three or more written objections from property owners within 1,000 feet should be automatically referred to the Planning Commission; and no delegation should occur until the revised ordinance has been in effect for at least one year, allowing the Commission to evaluate whether the strengthened alternatives analysis and application checklist are producing the improved application quality that staff anticipates.

Conclusion

The proposed ordinance updates are a substantial improvement over the 1996 regulations, and we support their core elements. Our three recommendations are intended to close the gaps that will determine whether the county can effectively protect its scenic resources, community character, and rural quality of life: giving staff the tools to independently evaluate questionable coverage claims, translating adopted General Plan policies into enforceable development standards that protect scenic ridgelines, property values, fire safety and wildlife, and ensuring that the public retains meaningful participation in decisions that permanently reshape their communities.

We respectfully request that the Planning Commission direct staff to incorporate these provisions before recommending adoption to the Board of Supervisors, or alternatively, continue the item to allow time for their consideration.

Thank you for your service and your attention to these issues.

Respectfully submitted,

Maggie Sokolov

David Ashcraft

maggie.sokolov@gmail.com

509 Grandview Road, Sebastopol

From: [Susan Anderson](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Wednesday, April 15, 2026 1:44:54 PM

EXTERNAL

Greetings Supervisors,

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you,

Susan L. Anderson

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From: [Therese Jennings](#)
To: [PlanningAgency](#)
Subject: Re: File No. ORD26-0001 — Telecommunications Ordinance Update
Date: Wednesday, April 15, 2026 11:07:04 AM

EXTERNAL

April 15, 2026

Sonoma County Planning Commission
Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403

PlanningAgency@sonoma-county.org

Re: File No. ORD26-0001 — Telecommunications Ordinance Update

Dear Commissioners and Staff:

My wife and I appreciate this opportunity to comment on the proposed amendments to Sonoma County's Telecommunications Ordinance. The proposed amendments, to date, are extremely valuable, well-thought-out, organized and incredibly timely, given the ever-increasing demands on Sonoma County resources by numerous competing telecommunications corporations.

As residents of Grandview Road in Sebastopol, my wife Therese and I are painfully familiar with the recent proposed change to zoning on nearby agricultural property in order to accommodate Verizon's proposed construction and operation of an industrial telecommunications facility. The importance of an updated ordinance for Sonoma County cannot be overstated. It has been, in fact, a long-standing need for this county and, in many ways, these changes and improvements can't happen soon enough.

That said, however, there remain a number of issues which, in our opinion, must first be resolved in order for the proposed ordinance update to live on as a shining example of Sonoma County's employees delivering some of their very best and finest work, the results of which demonstrate their commitment to county residents and visitors alike!

Preserving our county's scenic landscapes, visual aesthetics, rural charm, safeguarding the environment and local wildlife, protecting the property values of home owners and business owners are just several benefits that will be realized with this most comprehensive Telecommunications Ordinance Update.

For the Telecommunications Ordinance Update to live up to its full potential and proudly reflect the brilliant talent of Sonoma County's Planning Commission, and the Staff and Leadership within Permit Sonoma, we heartily support and endorse the provisions submitted to this body by David Ashcraft and Maggie Sokolov.

Before the Planning Commission makes a recommendation for adoption of the Telecommunications Ordinance Update to our Sonoma County Supervisors, incorporating the recommendations submitted by Mr. Ashcraft and Ms. Sokolov will prove inherently valuable to the

ordinance update. Their suggestions are exactly the kind of community input that the County of Sonoma richly deserves.

We also commend the Telecommunications Ad Hoc Committee and Permit Sonoma staff for their tireless work together and for having gotten us this far in securing and protecting Sonoma County's rightful authority and autonomy, particularly in light of the seemingly arbitrary and archaic regulations from 1996.

My wife and I therefore respectfully request that the Planning Commission take the additional time necessary to review and incorporate all reasonable suggestions and guidance from its many caring and concerned neighbors throughout the County of Sonoma, *BEFORE* asking the Board of Supervisors for approval and adoption.

Thank you, in advance, for your consideration, as well as for your own work and contributions on behalf of this county.

Respectfully submitted,
Michael and Therese Jennings
200 Grandview Road, Sebastopol
terbjennings@gmail.com
707-823-3930

— End of Public Comment to Sonoma County Planning Commission Hearing on April 16, 2026
—

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From: [Christy Pichel](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Wednesday, April 15, 2026 4:40:59 PM

EXTERNAL

Dear Commissioners and Staff:

I am very pleased to see all the work done by the Telecommunications Ad Hoc Committee and Permit Sonoma staff to revise the Telecom Ordinance. In addition, I have read the letter submitted by Maggie Sokolov and David Ashcraft and I support the additional recommendations in the letter.

- Independent coverage verification, when staff identifies concerns
- Codifying ridgeline protections in scenic areas
- Retaining Planning Commission review authority for telecom towers under the conditions they describe.

As a long-time resident of the West County with property that provides some of the Scenic Landscape along the Bodega Highway Scenic Corridor, I believe it would be valuable to include provisions for Wildfire Safety and Resource Protection.

Finally, the expansion of telecom infrastructure impacts the value of private property, and I agree that an analysis of the impact on nearby property values should be a considered.

Thank you,

Christy Pichel

406 Montgomery Road
Sebastopol, CA 95472

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From: [Davina Harden](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance — April 16th meeting - File No. ORD26-0001
Date: Thursday, April 16, 2026 9:54:05 AM

EXTERNAL

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you,

Davina Harden
Sonoma County Resident

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From: dananemd2@comcast.net
To: [PlanningAgency](#)
Subject: Proposed Revisions to the County's Wireless Facilities regulations
Date: Thursday, April 16, 2026 11:13:26 AM

EXTERNAL

Dear Planning Commissioners,

Please ensure the safety and health of our community by giving serious consideration to the EMF Safety Network's principal recommendations are summarized below:

- **Public Notice** shall be mailed to owners within one thousand (1,000') feet radius of the real property that is the subject of the hearing versus the current 300 ft.
- **Independent Technical Review:** An independent RF or electrical engineer's independent verification of the cell tower application such as coverage maps; gap in service data and compliance with the FCC's Maximum Permissible Exposure Levels (MPE).
- **Require all discretionary wireless applications be heard by the Planning Commission rather than the Zoning Administrator.**
- **Revise Proposed Cell Tower Setbacks:** Provide increased setbacks from cell towers on scenic corridors, ridgelines, and other visual resources, schools, medical facilities, dwellings, etc. to protect our health and safety and our property values.

Thank you for your consideration

Edmee Danan MD

Dananemd2@comcast.net

www.edmeedanan.com

707- 823 3809

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From: [Karna G](#)
To: [PlanningAgency](#)
Subject: Sonoma County Telecom Ordinance- April 16th meeting- File No. ORD26-001
Date: Thursday, April 16, 2026 11:48:36 AM

EXTERNAL

I would like to comment on the proposed updated Sonoma County Telecom Ordinance - File No. ORD26-0001.

I support the following:

- **Independent coverage verification,**
- **Codifying ridgeline protections in scenic areas,**
- **Retaining Planning Commission review authority for telecom towers.**

Thank you

Karna Gorczyca

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