



October 7, 2024

Sonoma County Board of Supervisors
575 Administration Drive
Room 100 A
Santa Rosa, CA 95403

VIA EMAIL: bos@sonoma-county.org

**RE: UPE22-0051: Appeal of denial of an intermediate freestanding
telecommunications facility
October 8, 2024, Board of Supervisors Hearing
Agenda Item #26**

Dear Chair Rabbitt and Supervisors Hopkins, Gore, Coursey and Gorin,

On behalf of the Applicant, VB BTS II, LLC ("Vertical Bridge"), and Co-Applicant, T-Mobile West LLC ("T-Mobile") (collectively, the "Applicants"), we submit this letter to provide additional information regarding the Applicants' appeal of the Sonoma County Board of Zoning Adjustments ("BZA") denial of Conditional Use Permit UPE22-0051 ("Application"). The Application proposed a 70-foot Intermediate Freestanding Telecommunication Facility ("IFTF" or the "Proposed Facility") at 9300 Mill Station Road, Sebastopol, located in unincorporated Sonoma County ("County").

Appeal Summary

The appeal should be approved, and the Application should be granted, with the conditions recommended by Staff, because substantial evidence in the record establishes:

1. There is a significant gap in T-Mobile's in-building service coverage in the targeted service area.
2. The site must be located at a certain height and in a certain area in order to provide acceptable quality of service in the significant gap.
3. The Proposed Facility, as designed, is compatible with the surrounding area, and Applicants have offered multiple design options. Applicants are willing to implement the County's preferred design.

4. Applicants' application meets all design and location requirements of the Sonoma County Municipal Code ("SCMC") for an IFTF in the Diverse Agriculture ("DA") District. No exceptions or variances are required.
5. Under the federal Telecommunications Act of 1996, the Proposed Facility is the least intrusive means for Applicants to provide acceptable quality of service within the significant gap in coverage, and the County would be materially inhibiting Applicants' ability to provide wireless broadband communications services if the Application is denied.

The Applicants support Permit Sonoma Staff's ("Staff") recommended action. We respectfully request that the Board of Supervisors ("Board") reverse the BZA's decision, find the project exempt from the California Environmental Quality Act (CEQA), and issue the use permit for the Proposed Facility.

While the Applicants generally concur with the findings in Staff's October 8, 2024, Summary Report, we would like to offer the following two clarifications:

Clarifications to Summary Report

1. Board of Zoning Adjustments Decision (Page 5)

The Summary Report states, "The BZA also requested a coverage map of the area showing all wireless providers. However, the applicant does not have access to that information, and the request was not necessary for determining whether a substantial gap in T-Mobile's wireless coverage exists."

We would like to clarify that not only is such information unnecessary, but it is also irrelevant to the applicable legal standard for determining whether a substantial gap in T-Mobile's wireless coverage exists. The Ninth Circuit Court of Appeals has expressly adopted the rule that "a significant gap in service (and thus an effective prohibition of service) exists whenever a provider is prevented from filling a significant gap in *its own* service coverage." *T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987, 995, FN. 9 (9th Cir. 2009); *MetroPCS, Inc. v. City & County of San Francisco*, 400 F.3d 715, 733 (9th Cir. 2005)(emphasis added).¹ Wireless coverage provided by other carriers is irrelevant to determining whether T-Mobile has a significant gap in its own network coverage, which Applicants have clearly demonstrated in the Application.

2. Staff Response (Page 8)

¹ See email from Kevin P. Sullivan, Esq., dated April 3, 2023 (Attachment 13 of the October 8, 2024, Board of Supervisors agenda packet ("Agenda Packet")).

The Summary Report states, “The appeal also indicates the applicant sent certified mailings to this property owner on June 27, 2024, and July 24, 2024, but both were returned as undeliverable and a published phone number for the property owner was invalid.”

We would like to clarify that the Applicants initially contacted the property owner via U.S. Postal Service mail at the listed mailing address, on March 24, 2022. As documented in the alternatives analysis on file, the property owner did not respond to the Applicants’ inquiries. Following the last BZA hearing on June 20, 2024, Applicants made further attempts to contact the property owner by certified mail, first at the listed mailing address on June 27, 2024. When no response was received, another letter was sent via certified mail to the situs address on July 24, 2024, which was returned as undeliverable. Despite these efforts, no response was received.²

Key Points of Appeal

The BZA provided five findings for denial in Resolution 24-05. For the purposes of brevity, the BZA’s findings have been summarized in this letter. Applicants filed an appeal of the BZA’s decision because there is a lack of substantial evidence to support the findings, the findings contradict the applicable SCMC requirements for an IFTF in the DA district, and the BZA’s decision is contrary to applicable law.

1. BZA Finding 1: Significant Gap in Service Coverage

The BZA found that a significant gap in T-Mobile’s service coverage does not exist. This finding is unsupported by the evidence in the record. T-Mobile’s Coverage Objective and Engineering Justification, prepared by a qualified radio frequency (“RF”) engineer, clearly demonstrates a lack of reliable in-building signal strength in the desired coverage area, and as explained in the Coverage Objective and Engineering Justification, federal courts have recognized for over 15 years that a “significant gap” can exist based on inadequate in-building coverage. The coverage improvement is expected to deliver reliable in-building service to an estimated 994 additional residents in the Sebastopol area of Sonoma County.³

Under the County’s Code, there is ***no requirement*** to demonstrate a service need for an IFTF in the DA district.⁴ The requirement to provide an alternatives analysis, including

² See Applicants’ appeal letter, dated 8/23/2024. Copies of the certified mail receipts are included with that letter. (Attachment 6 of the Agenda Packet).

³ T-Mobile Coverage Objective & Engineering Justification, Chris Cubanske, February 28, 2024. (Attachment 7 of the Agenda Packet).

⁴ An alternatives analysis is required for major freestanding facilities in all districts and for intermediate

service gaps, *applies to IFTF only in certain zones, not for IFTF in the DA district*. Nonetheless, T-Mobile has provided substantial evidence demonstrating a significant coverage gap in the proposed area, as recognized by federal law.

The only contrary evidence in the record comes from community members citing T-Mobile's online coverage maps. However, as explained on page 13 of the Coverage Objective & Engineering Justification,⁵ these maps approximate *outdoor coverage only* and do not guarantee service availability.

Additionally, some community members argued that their existing wireless service is acceptable. However, such statements are anecdotal and do not constitute substantial evidence.⁶ Moreover, these comments did not specify whether the service in question was provided by T-Mobile, meaning the experiences shared are likely irrelevant to the specific coverage gap that the Proposed Facility is intended to address.

2. BZA Finding 2: Feasible Alternatives

The BZA found that a feasible alternative exists that would provide service to areas currently without coverage, and the Applicants did not adequately demonstrate that the alternative site is unavailable or that sufficient efforts were made to secure it. This finding is unsupported by the evidence and should not serve as a basis for denying the Application.

As explained above, an alternatives analysis is *not required* for an IFTF in the DA zone with a DA land use designation.⁷ Despite not being required, Applicants provided an analysis of other sites considered for the construction of a new freestanding facility. This analysis was included as part of the Application to demonstrate that under federal law (in contrast to under the County's code) the Proposed Facility is the least intrusive means of meeting T-Mobile's coverage objectives for this site.

Once a wireless provider presents prima facie evidence of a significant gap and demonstrates that its proposal is the least intrusive means for closing that gap, the burden shifts to the local government to prove that an available, feasible, and less intrusive

freestanding facilities in the AR, RR, R1, R2, R3, and PC districts with a UR or RR land use designation. Sec. 26-88-130(a)(3)(xiv). The proposed facility is an intermediate facility in the DA district.

⁵ T-Mobile Coverage Objective & Engineering Justification, Chris Cubanske, February 28, 2024.

⁶ *Industrial Tower and Wireless, LLC v Haddad*, 109 F.Supp.3d 284, 301 (D. Mass 2015) (“[A]necdotal testimony of a small number of individual residents is not sufficient to raise a genuine issue of fact as to the existence of a gap in coverage[.]”).

⁷ An alternatives analysis is required for major freestanding facilities in all districts and for intermediate freestanding facilities in the AR, RR, R1, R2, R3, and PC districts with a UR or RR land use designation. SCMC § 26-88-130(a)(3)(xiv).

alternative exists.⁸ To meet this shifted burden, the opponents and/or the local government must show that another alternative is (a) available, (b) technologically feasible, and (c) less intrusive than the carrier's proposed gap solution.⁹ In this case, the BZA did not provide sufficient evidence to meet this burden.

The BZA's assertion that "there is a feasible alternative" is unsupported. As explained in the County Counsel Memorandum¹⁰ ("Memorandum"), theoretical alternatives cannot be relied upon to support a denial. The alternative location in question, located at 9845 Cherry Ridge Road, is not a feasible alternative because it is not available to the Applicants. See comments above under Clarifications to Report, #2.

Furthermore, Applicants submitted this Application to address a well-documented in-building service gap in *this location*.¹¹ The evidence in the record, provided by Applicants, clearly demonstrates that a significant gap in in-building coverage exists in the targeted service area, which the Proposed Facility is designed to fill. The County does not have the authority or technical expertise to dictate or alter T-Mobile's technical service objectives, including T-Mobile's proposed service area.

3. BZA Finding 3: Alternative Site at 9845 Cherry Ridge Rd.

The BZA found that the site at 9845 Cherry Ridge Road may provide better service with a less intrusive facility. This finding is unsupported by the evidence in the record and should not serve as a basis for denying the Application.

As stated previously, the County does not have the authority to dictate T-Mobile's service objectives, including the location of T-Mobile's proposed service area, nor the technical expertise to determine what may constitute "better service;" nor may it rely on theoretical alternatives. Additionally, there is nothing in the record to support the finding that a facility located at 9845 Cherry Ridge Road would be a "less intrusive" facility.

Importantly, before an alternative may be found "less intrusive" it must first be available and feasible. The property at 9845 Cherry Ridge Road is not available, so there is no basis to evaluate its potential relative intrusiveness.

Even if the property on Cherry Ridge Road were available, the Proposed Facility at 9300 Mill Station Road is less intrusive than a facility would be at the Cherry Ridge alternative because there is a substantial tree line on the southern property line. This tree line serves

⁸ See *T-Mobile USA, Inc. v. City of Anacortes*, 572 F.3d 987, 995, 998-99 (9th Cir. 2009).

⁹ *Id.*

¹⁰ County Counsel Memorandum dated July 27, 2023.

¹¹ Please refer to the T-Mobile Coverage Objective & Engineering Justification, slides 2,5,7 & 8, Chris Cubanske, February 28, 2024, detailing the specific coverage objective for the Proposed Facility.

as a significant landscape buffer to the adjacent rural residential parcels to the south, effectively screening the Proposed Facility from view from the residential neighborhood to the south.

The Cherry Ridge parcel, on the other hand, lacks any tall trees or other significant landscape elements to screen a facility from surrounding views. A facility at this location would, in fact, be much more visible to the surrounding neighborhood, and therefore would not be less intrusive.¹²

4. BZA Finding 4: Consistency with County Zoning Code

The BZA found that the Proposed Facility does not meet visual impact criteria and is inconsistent with the County Zoning Code. The BZA's findings are not supported by the facts and lack substantial evidence to justify a denial.

As confirmed by Staff in all previous staff reports, the Proposed Facility fully complies with the County Zoning Code and results in less-than-significant visual impacts. No exceptions or variances have been requested or are required.

Wireless communication facilities ("WCFs") have a unique need for height that other traditional land uses do not. As the majority of California households now rely on wireless as their sole means of communication,¹³ WCFs must be located within the communities they are intended to serve, including agricultural and rural residential areas. Due to this unique height requirement, WCFs will inevitably be visible. However, these visual impacts are mitigated through stealth design and best siting practices, such as utilization of natural landscape buffers. Applicants provided four stealth design options to mitigate visual impacts, including a fully stealthed water tank structure in which the antennas would be entirely screened from view.

Like other essential infrastructure, such as utility poles or towers, the height of WCFs will always exceed that of surrounding residential structures. SCMC § 26-88-130(a)(3)(ii) explicitly acknowledges the technical limitations of WCFs, recognizing that location, design, and screening techniques must accommodate the technological requirements of these facilities. The Code permits intermediate facilities to reach up to 130 feet in height; in contrast, the Proposed Facility is only 70 feet tall, significantly below the maximum allowable height. This 130-foot height limit indicates that the Code has already considered and accepted the potential visual impact associated with the necessary height of such facilities.

¹² Please refer to the Comparative Site Map included as attachment B to Applicants' appeal letter. (Attachment 6 of the Agenda Packet).

¹³ *CDC Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, July-December 2023 (released June 2024).

It appears that the BZA's findings here, are based, in part, on the homemade photo simulations submitted as part of public comments. These homemade photo simulations do not constitute credible evidence. They lack crucial information, such as the precise location from which the photos were taken, how the specific location of the tower was selected, or how the correct height of the proposed facility was ensured. Importantly, the "monopine" pictures provided in the public comment material do not reflect the standards to which Vertical Bridge constructs its monopines. The prominence of the antennas, the color, and the branch density are all inaccurately depicted. The reliance on homemade photo simulations, which lack the accuracy and credibility of professional assessments, undermines the validity of the BZA's findings.

In contrast to the homemade photo simulations, professional photo simulations provided by the Applicants are prepared using computer modeling that incorporates precise data points to accurately reflect the existing features of the vicinity and the proposed tower. These professional simulations are accompanied by detailed vicinity maps that pinpoint the exact locations from which the photos were taken, ensuring verifiable accuracy and scale. This provides an accurate and credible basis for evaluating the visual impacts.

Additionally, Applicants have provided drone footage offering a 360-degree panoramic view from the proposed site's location at the proposed height. When viewed frame by frame, this footage demonstrates that the stealth facility would only be directly visible from the windows of two homes, effectively rebutting the unsupported claims made about visual impacts in written public comments and during public testimony.¹⁴

5. BZA Finding 5: Health, Safety and Welfare

There is no evidence in the record indicating the Proposed Facility would be detrimental to the health, safety, peace and comfort or general welfare of persons residing or working in the neighborhood. On the contrary, the Proposed Facility will contribute positively by enhancing reliable communication services, which are essential for emergency response and everyday connectivity. The Proposed Facility will comply with all relevant safety standards while providing significant benefits to the community by improving access to critical wireless services.

Response to Public Comments

This letter provides a summarized response to the public comments received regarding the Application. The bulk of these comments have already been addressed by Applicants

¹⁴ Please refer to the Drone Footage: Viewpoints and Visibility exhibit included as attachment C to Applicants' appeal letter, dated August 23, 2024.

in the record.¹⁵ Many of the public comments are duplicative; thus, the following responses are based on common topics found in the public comments, as follows:

1. Evidence of T-Mobile's Service Gap

We disagree with the public comments' characterization of the federal "significant gap test" and the evidence purportedly required for a carrier to demonstrate a significant gap in service. County Counsel provided guidance on this matter in Section II(a) of the Memorandum. We support County Counsel's analysis on this matter and respectfully refer the Board to the Memorandum for guidance.

Additionally, we ask that you consider the evidence submitted by Applicants, as discussed in response to BZA findings #1-2 above, as well as the Applicants' appeal letter on this topic.

2. Property Values

A number of public comments have raised concerns about the potential impact of the Proposed Facility on property values.

Over a period of more than two years, Applicants worked in good faith to respond to concerns regarding aesthetics. In response to concerns raised, Applicants have incorporated multiple design changes throughout the life of the project, including reducing the original tower height by 10 feet (from 80 feet to 70 feet), proposing four different stealth design options to better align with the surrounding neighborhood's character, and introducing new landscaping to further integrate the facility into the environment. These design changes reflect the Applicants' earnest efforts to integrate the facility within the community to the maximum extent feasible, addressing any aesthetic concerns that could be seen to indirectly influence perceptions of property value.

Moreover:

- Concern over a decrease in property values may not be considered as reason to deny or condition a wireless facility if the fear of property value depreciation is based on concern over the health effects caused by RF emissions. *AT&T Wireless Services v. City of Carlsbad*, 308 F.Supp.2d 1148 (S.D.Cal. 2003).

¹⁵ See Vertical Bridge Response Letter dated February 18, 2024 (Attachment 14 of the Agenda Packet) and Vertical Bridge Response to Comments letter dated October 3, 2024, in the administrative record for UPE22-0051.

- The authorities typically cited for up to a 20% decrease in property values as alleged in public comments are based largely on a 2003 study by Sandy Bond, PhD (published in 2005), which has since been discredited¹⁶ and the purpose of which was to evaluate property value impacts due to concerns about health effects. Sandy Bond herself was unable to replicate the results of her New Zealand study in a 2004 study in Florida, which found only a de minimus (approximately 2%) variation in property values.¹⁷
- Public comments also refer to a 2014 survey by the National Institute for Science, Law and Public Policy, which suggested that a high percentage of respondents believed that a cell tower would impact property values. This survey was far from a scientific study, and similar to the Bond study, its results are tied to perceived health effects. The sample used was self-selected through circulation of the survey through social media and email, and the bias of the respondents is obvious when you consider that a high percentage of respondents also believed that they had suffered physical (63%) or cognitive (57%) effects from radiation.¹⁸
- In contrast, potential impacts to property values are often found to be insignificant. A 2021 analysis found no statistically significant impacts of cell towers on residential property values in California. See: <https://haus.com/resources/the-impact-of-cell-towerconstruction-on-residential-property-values>
- Finally, with so few homeowners retaining a landline phone (as of 2023, 76% of adults and 86.8% of children lived in wireless-only households¹⁹), good wireless service is *critical* to home value.

It is thus clear that concerns related to property values, when indirectly linked to RF emissions, cannot serve as a legitimate basis for State or local decision-making under federal law. This underscores the importance of focusing on the broader benefits that the Proposed Facility brings to the community. Enhancing connectivity not only drives economic value but also significantly improves public safety, offering a net benefit to the local community.

3. Private Views & Visual Impact

¹⁶ See discussion by Dr. Jonathan L. Kramer, Esq., a telecommunications advisor to the League of California Cities and many California municipalities at: <https://jonathankramer.com/?s=sandy+bond>.

¹⁷ Sandy Bond, PhD, "The Effect of Distance to Cell Phone Towers on House Prices in Florida" *The Appraisal Journal* (Fall 2007).

¹⁸ <https://electromagnetichealth.org/electromagnetic-health-blog/survey-property-desirability/>

¹⁹ *CDC Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, July-December 2023 (released June 2024).

Several public comments have argued that the Proposed Facility would impact “protected views.” However, private views are not protected under the Code, and therefore, this is not a relevant criterion in the decision-making process. The County’s Visual Assessment Guidelines state that the analysis of project impacts should focus on *public viewing* points, such as from public roads, trails, and parks, to determine where a project would be most *visible to the general public*.²⁰ The Proposed Facility is set back approximately 354 feet from Mill Station Road, which significantly exceeds the 30-foot setback required under the Code. The Facility has been designed to minimize visual impacts from public viewing points through the use of stealth design and by incorporating a substantial setback from the adjacent public road. According to the County’s Visual Assessment Guidelines, Staff determined the Proposed Facility results in a less-than-significant impact.²¹

Furthermore, the County’s General Plan does not protect private views as a matter of policy. The General Plan identifies three types of scenic resources - Community Separators, Scenic Landscape Units, and Scenic Highway Corridors²² - illustrating the County’s policy decision to prioritize broader community impacts and public resources, such as protecting designated scenic resources and public vistas, over private concerns regarding views. Importantly, the Proposed Facility is not located within any Scenic Resource Designation.

Although there is no requirement to evaluate views from private properties under the Code, the Applicants voluntarily conducted a drone assessment to evaluate potential impacts on private views, as requested by the BZA. The 360-degree panoramic footage²³ demonstrates that only two homes would have direct views of the Proposed Facility, further supporting that the facility would not have a significant visual impact.

4. Consideration of RF Emissions is Preempted by Federal Law

Several public comments have argued that the RF emissions from the project will have negative impacts. However, any consideration of such alleged issues is preempted by federal law.²⁴ Staff discusses this topic on page 3 of the Summary Report, and County

²⁰ Permit Sonoma Visual Assessment Guidelines, January 2019.

²¹ See Staff Reports dated May 23, 2023, July 27, 2023, and June 13, 2024.

²² Sonoma County General Plan, Open Space and Resource Conservation Element, page OS-7.

²³ The full drone footage was submitted electronically with Applicants’ letter dated February 18, 2024, and is on file with the County. Screen shots of the drone footage are included as Attachment C of Applicants’ appeal letter dated August 23, 2024. (Attachment 6 of the Agenda Packet.)

²⁴ Under the Telecommunications Act of 1996, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv).

Counsel provides guidance on this topic in Section II(b) of the Memorandum. We support the referenced discussion on this matter.

As part of the Application, the Applicants have provided independent reports prepared by Hammett & Edison, Inc., Consulting Engineers, (dated August 20, 2023, and an updated report dated March 20, 2024), demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission's RF emissions regulations.

Accordingly, this issue is preempted under federal law, and any testimony or documents relating to the environmental or health effects of the proposed facility should be disregarded. Specifically, the project may not be conditioned or denied based on allegations of adverse health effects, including alleged impacts on the health of bees.

5. Microplastics Concerns

Public comments have expressed concern regarding the potential deterioration of project materials (faux tree boughs) leading to the release of microplastics. Despite the fact that no evidence has been submitted regarding baseline data for existing microplastics in the environment or any scientific methodology for measuring potential increases due to the facility over time, the Applicants have submitted alternative designs to alleviate this potential concern, namely the faux water tower, faux windmill tower and the unstealthed monopole design.

Many of these public comments appear to be drawn from an article published by the Environmental Health Trust ("EHT"), which was included in the public comments. The EHT article includes arguments made by opponents in a similar land use appeal hearing involving a wireless monopine facility in the Tahoe region. However, the EHT article fails to acknowledge that those opponents ultimately lost their appeal. In 2022, the Tahoe Regional Planning Agency (TRPA) denied the appeal to revoke the permit for that monopine facility, concluding that the faux needles made of PVC do not break down into microplastics and would not significantly impact the environment.²⁵ TRPA's decision underscores that unsupported concerns about microplastics from similar facilities lack merit, and the arguments raised in this case should be considered in the same context.

Additionally, the Applicants will be required to comply with a condition of approval that mandates routine maintenance of the Proposed Facility, including the monitoring and replacement of any faux branches and leaves (see draft condition of approval #5). This routine maintenance would mitigate concerns about the potential material debris. Furthermore, the Applicants are willing to implement any of the other proposed design options that may be deemed most appropriate by the Board.

²⁵ <https://www.tahoedailytribune.com/news/trpa-denies-cell-tower-appeal-in-south-tahoe/>

6. Fire Safety and Fall Zone

Public comments have raised concerns regarding potential fire hazards. As part of the building permit process, the facility is required to comply with the applicable requirements of the California Fire Code, as amended and adopted by Sonoma County, and must comply with the fire and emergency services conditions of approval (see draft conditions of approval #19-24).

The Proposed Facility exceeds all setback requirements. Each stealth design option is set back greater than the facility's height from adjacent property lines and will meet all required safety standards upon construction. Wireless towers are designed and built to meet the independent requirements of the American National Standards Institute (ANSI), Tower Industries Association (TIA), as well as state and local building codes, and are designed to withstand the applicable elements in accordance with required industry standards. Significant safety factors are built into all structural calculations and are designed into any wireless communications tower.

Public Benefits

The Proposed Facility offers substantial public benefits, particularly in enhancing the quality of wireless communication services in this rural area of the County. These benefits are critical not only for everyday communication but also for public safety and emergency response.

Reliable wireless communication is essential for public safety. In California, more than 87% of 911 calls are made from a wireless device,²⁶ and more than 76% adults and 86.8% of children live in wireless-only households.²⁷ Reliable and timely access to first responders is critical. For example, research shows that a 1-minute reduction in emergency response times translates into an 8% reduction in mortality in cardiac arrest outcomes.²⁸ The Proposed Facility will extend reliable in-building service coverage to an additional 995 residents²⁹ in this rural area of the County, northwest of Sebastopol. This will not only improve access to emergency services but also enhance access to education, healthcare, and vital social and government services.

²⁶ <https://www.911.gov/issues/911-stats-and-data/>

²⁷ *CDC Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, July-December 2023 (released June 2024).

²⁸ Elizabeth Tye Wilde, *Do Emergency Medical System Response Times Matter for Health Outcomes?*, *Journal of Health Economics* 22: 790-806 (2013)

²⁹ Please refer to the T-Mobile Coverage Objective & Engineering Justification, slide 6, Chris Cubanske, February 28, 2024.

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Conclusion

We appreciate the Board's consideration of the information and evidence presented in this appeal. Given the comprehensive evidence and detailed analysis, we respectfully request, as recommended by Staff, that the Board of Supervisors reverse the BZA's decision and approve the project as proposed, selecting the design option most preferred by the County.

Sincerely,

A handwritten signature in blue ink that reads "Hannah Boroviz". The signature is written in a cursive style with a blue ink color.

cc: Peter Kaljian, Project Planner, Permit Sonoma
Hannah Spencer, Supervising Planner, Permit Sonoma
Tasha Levitt, Administrative Assistant, Permit Sonoma