
From: Meridee Pabst <meridee.pabst@wirelesspolicy.com>
Sent: Friday, May 15, 2026 12:48 PM
To: Doug Bush <Doug.Bush@sonomacounty.gov>
Cc: Hannah Borris <hannah.borris@wirelesspolicy.com>
Subject: File No. ORD26-0001 - Telecom Ordinance Update - Pipeline Provision

EXTERNAL

Hello Doug,

On behalf of Vertical Bridge, we have attached a comment letter supporting staff's recommended pipeline provision for the County's proposed new telecom ordinance (File No. ORD26-0001).

Thank you for considering these comments and forwarding the letter to the Board of Supervisors.

Meridee Pabst

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May 15, 2026

Doug Bush
Project Manager
Permit Sonoma
2550 Ventura Ave.
Santa Rosa, CA 95403

Sent via Doug.Bush@SonomaCounty.gov

Re: Telecommunications Ordinance Update
Permit Sonoma File No. ORD26-0001
Vertical Bridge Comments – *Pipeline Provision for Pending Applications*

Dear Doug,

On behalf of VB BTS II, LLC (“Vertical Bridge”), we write to comment on Sonoma County’s proposed new telecommunications ordinance (No. ORD26-0001) and its applicability to pending project applications. We understand that these comments will be forwarded to the Board of Supervisors for its consideration prior to the May 19th hearing on this matter.

Vertical Bridge has two applications for proposed wireless towers pending in Sonoma County at this time, and it supports staff’s recommendation¹ that all applications that have been **filed** prior to the effective date of the new ordinance be processed under the current telecommunications ordinance. Vertical Bridge agrees with staff that this approach promotes fairness and predictability, and it will keep implementation simple and low-risk.

Moreover, both of Vertical Bridge’s pending applications are **complete** for purposes of County review, and if the Board is inclined to follow the Planning Commission’s reasoning that completeness should be the milestone, Vertical Bridge respectfully requests that the County continue to review **both** of its applications under the current telecommunications code. The filing or completeness date for an application pending during a code change is often used as the relevant milestone for determining vested rights, and in Vertical Bridge’s view, if filing is not the milestone adopted by the Board, completeness is a fair milestone under the circumstances described herein.

¹ Board of Supervisors Agenda, May 19, 2026, item 43.

The applications' status details are as follows:

UPE24-0060 – 2783 Guerneville Road, Santa Rosa

The application for this proposed tower was heard by the Planning Commission on November 20, 2025. The Planning Commission requested additional analysis of alternative tower designs and other details, and Vertical Bridge agreed to continue the hearing to allow for time to produce the requested materials.

Vertical Bridge submitted additional analysis of alternative designs, including photo simulations and drawings, on April 27, 2026, and the continued hearing is now queued up for the June 18, 2026, Planning Commission meeting.

UPE24-0033 – 4690 D Street Ext., Petaluma

This tower application was accepted by the County on April 4, 2024, and all applicable application fees were paid on April 11, 2024. In correspondence dated May 15, 2024, Project Planner Peter Kaljian confirmed that “this application meets all the application submittal requirements in PJR-010.” This communication confirmed that the application was complete on May 15, 2024.²

After completeness, Mr. Kaljian sent Vertical Bridge referral comments from the Sonoma County Fire District and Sonoma County Natural Resources Department as part of the County's ongoing substantive review of the application. The fire district comments were resolved by October 2024. Because they were dependent on on-site surveys subject to seasonal constraints and limited survey windows, Vertical Bridge's responses to the natural resource comments extended into the applicable survey seasons. These surveys have now been completed, and Vertical Bridge submitted updated application materials on May 14, 2026. This submittal addresses all referral comments for this application.

Planning Commission Input from April 16, 2026, Meeting

At the April 16, 2026, Planning Commission hearing on ORD26-0001, Planning Commission members discussed supporting the application of the current telecommunications code to project applications that body had already heard, which they were expecting back with additional information for the Commission's consideration. Vertical Bridge's project at 2783 Guerneville Road, Santa Rosa (UPE24-0060) meets those criteria.

² Please note that by our calculations, in the alternative, the application was deemed complete by operation of law on May 14, 2024.

Also at the April 16, 2026, hearing, we heard staff advise the Planning Commission that all other pending applications for a wireless tower were incomplete or on hold, and the Planning Commission's discussion did not reach the specific status of Vertical Bridge's project at 4690 D Street Ext., Petaluma (UPE24-0033). We believe the County's planning portal erroneously describes the application status as "incomplete" as of September 17, 2024. As explained above, the application was complete for the County's substantive review no later than May 15, 2024. Also, the County planning portal's note is accompanied by an explanation that fire turnouts are required, and Vertical Bridge submitted revised plans with the required turnouts in October 2024, to which Mr. Kaljian responded that the Fire District comments had been resolved.³ (At some point between late 2024 and early 2025, Mr. Kaljian left the County and a new planner was assigned to the project; this may explain the inaccurate status notes in the portal.)

Because the Petaluma (UPE24-0033) proposal's application is both filed and complete, Vertical Bridge requests that this application also be considered a pending pipeline project and continue to be reviewed under the regulations in effect at the time the application was filed or deemed complete, rather than the new telecommunications ordinance.

The UPE24-0033 application has spent approximately two years working through the County's review process under the County's current telecommunications regulations and in reliance on those regulations. Applying newly adopted regulations at this late stage in the review process would effectively subject the project to a moving target after substantial County review, applicant time and expense, and County-directed technical analysis have already been completed. Finally, no public comments were submitted for UPE24-0033 in response to the notice of application circulated by Mr. Kaljian.

Thank you for your consideration of these comments.

Sincerely,

Meridee Pabst
meridee.pabst@wirelesspolicy.com

³ This confirmation was provided to the applicant in an October 30, 2024, email.