



LETTER OF JUSTIFICATION

Wireless Telecommunications Facility (Faux Eucalyptus Tree Design)

R-O Recreation Open Space Zone

Orange County Flood Control District Property

City of Orange, California

To: Community Development Department

City of Orange

Re: Wireless Telecommunications Facility – 70-Foot Height Justification and Replacement of Existing Facility

Applicant: AT&T Mobility

Dear Planning Staff,

On behalf of AT&T Mobility, this Letter of Justification is submitted in support of approval of a proposed 70-foot wireless telecommunications facility to be located on property owned by the Orange County Flood Control District within the R-O (Recreation Open Space) zoning district.

The facility will be designed and screened as a **faux eucalyptus tree (monopine/monoeucalyptus design)** to visually blend with the surrounding environment and minimize aesthetic impacts.

This application is submitted pursuant to OMC Sections 17.08.030 and 17.12.025 and includes all required plans, technical documentation, photo simulations, and operational analyses.

I. Purpose of the Proposed Facility

The proposed wireless telecommunications facility is necessary to replace an existing AT&T facility in the surrounding area that will be decommissioned due to circumstances beyond AT&T's control.

If a replacement site is not constructed prior to removal of the existing facility, a significant gap in wireless coverage and capacity would occur within this portion of the City.

This project is therefore a **replacement facility**, not an expansion of service into a new area. It is required to maintain existing service levels for residents, businesses, and emergency responders.

II. Compliance with OMC §17.08.030 (Application Requirements)

In accordance with OMC §17.08.030, AT&T has submitted a complete application package including:

- Site plans and elevations
- Landscape and screening plans
- Photo simulations demonstrating the faux eucalyptus design
- RF emissions compliance documentation
- Structural engineering analysis (to be provided at a building)
- Property authorization documentation
- A report describing operational and capacity needs in plain language

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These materials provide the City with sufficient information to evaluate the project under the Zoning Ordinance.

III. Compliance with OMC §17.12.025 (Wireless Communication Facilities)

A. Operational and Capacity Needs Report (Layman's Terms)

Wireless networks operate by dividing the community into coverage areas served by individual cell sites. Each site must be positioned at a specific height and location to provide reliable voice and data service.

In the vicinity of the proposed site:

- The existing AT&T facility currently provides essential coverage to surrounding residential neighborhoods, roadway corridors, and nearby businesses.
- Wireless demand continues to grow due to streaming services, remote work, video calls, smart devices, and public safety communications.
- Removal of the existing site without replacement would result in dropped calls, slower data speeds, and unreliable indoor service.

In simple terms, residents and businesses depend on wireless connectivity every day. Without this replacement facility, service quality in the area would noticeably decline.

The proposed site will:

- Maintain reliable voice service, including 911 connectivity;
- Restore and preserve network capacity;
- Improve indoor signal reliability;
- Support continued growth in wireless demand.

B. Height Justification – 70 Feet

Although the R-O zoning district contains a lower height limitation, the requested 70-foot height is the minimum necessary for the following reasons:

1. **Replacement of Existing Effective Height**

The existing AT&T facility operates at a comparable antenna height. Replicating this height is necessary to prevent service degradation and coverage gaps.

2. **Signal Clearance Requirements**

Antennas must clear surrounding trees, vegetation, and nearby structures to function properly. A reduced height would result in signal obstruction and diminished performance.

3. **Minimization of Additional Infrastructure**

Providing adequate height at one location reduces the need for multiple shorter installations, thereby limiting cumulative visual impacts.

4. **Stealth Design Integration**

The facility will be screened as a faux eucalyptus tree, incorporating realistic branch structures and foliage to blend with existing tree cover in the area. Ground equipment will be screened consistent with City standards. This design significantly mitigates visual impacts despite the requested height.

For these reasons, the proposed 70-foot height represents the minimum functional height necessary to maintain service continuity while incorporating effective camouflage.

IV. Stealth Design – Faux Eucalyptus Tree

In compliance with the design and screening objectives of OMC §17.12.025, the facility will be constructed as a faux eucalyptus tree. The design will include:

- Simulated eucalyptus bark finish
- Integrated branch elements to conceal antennas
- Artificial foliage consistent in color and texture with surrounding vegetation
- Fully screened ground equipment enclosure

This approach substantially reduces visual impacts and ensures compatibility with the surrounding environment, particularly given the proximity of vegetation and open flood control property.

V. Decommissioning of Existing Facility

The existing AT&T facility serving this area will be decommissioned due to circumstances outside AT&T's control. The proposed facility is required to maintain uninterrupted service.

The anticipated timeline is as follows:

- Estimated on-air date of proposed facility: Q4 2027
- Decommissioning of existing site: approximately three (3) months after activation of the new facility (estimated Q1 2028)

This transition ensures continuous service while allowing for orderly removal of the existing installation.

VI. Conclusion

The proposed wireless telecommunications facility:

- Complies with the procedural requirements of OMC §17.08.030;
- Satisfies the substantive standards of OMC §17.12.025;
- Is necessary to replace an existing AT&T facility that will be decommissioned;
- Requires a 70-foot height to prevent coverage loss;
- Incorporates a faux eucalyptus stealth design to minimize aesthetic impacts;
- Ensures continued reliable wireless and emergency communications within the City.

For these reasons, AT&T Mobility respectfully requests approval of the proposed 70-foot faux eucalyptus wireless telecommunications facility.

Respectfully submitted,

David Elliott,

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