



# SAN FRANCISCO PLANNING DEPARTMENT

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## Letter of Determination

June 28, 2017

Tony Phillips  
Sac Wireless for Comcast  
540 W. Madison – 17<sup>th</sup> Floor  
Chicago, IL 60661

<b>Record Number:</b>	2017-006403ZAD
<b>Site Address:</b>	Various Addresses
<b>Assessor's Block/Lot:</b>	Various Blocks/Lots
<b>Zoning District:</b>	Varies
<b>Staff Contact:</b>	Ashley Lindsay (415) 575-9178 <a href="mailto:Ashley.Lindsay@sfgov.org">Ashley.Lindsay@sfgov.org</a>

Dear Mr. Phillips:

This letter is in response to your request for a Letter of Determination (LOD) as to whether the installation of Comcast's latest technology, Machine Q, may be allowed on billboards and considered a Micro Wireless Telecommunication Service (WTS) Facility.

On August 2, 2016, the Board of Supervisors adopted Ordinance No. 16-166 (Planning Code - Wireless Telecommunications Services Facilities) which, among other things, amended the Planning Code to add "Micro WTS Facilities" as a use category which is principally permitted in all zoning districts subject to specific limitations. Micro WTS Facilities is defined as follows:

*Wireless Telecommunications Services (WTS) Facility, Micro. The Zoning Administrator shall determine whether a proposed WTS Facility is a Micro WTS Facility. A Micro WTS Facility is generally characterized by*

- (a) limited spatial effects;*
- (b) a small number of antennas (typically up to two);*
- (c) an absence of substantial cumulative effects on neighborhood character or aesthetics, when considered in conjunction with other WTS Facilities at the same project site; and*
- (d) a location that is not "disfavored" as specified in the Guidelines.*

After reviewing previous determinations, relevant Planning Code provisions, and the information submitted with your letter, it is my determination that the proposed installation as described below would not be consistent with the definition of Micro WTS Facilities based upon the following:

1650 Mission St.  
Suite 400  
San Francisco,  
CA 94103-2479

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

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- Billboards are regulated as General Advertising Signs pursuant to Article 6 of the Planning Code. An inventory is maintained for all General Advertising Signs. These signs are considered legal non-complying structures and non-conforming uses, and these signs, including billboards, shall not be expanded or intensified, pursuant to Section 181 of the Planning Code. The installation of a wireless facility and ancillary equipment on billboards is considered to be an intensification and therefore not permitted.
- Comcast can explore alternative siting locations on compliant structures, such as rooftop locations, in areas considered Location Preferences 1 through 6, as outlined by the Wireless Telecommunication Services Guidelines. Although the configuration submitted with the LOD request [Two (2) - 28" Omni Antennas, One (1) – 8" LTE Antenna, One (1) – 3" GPS Antenna, and One (1) – 8.74" x 10.43" x 3.81" Gateway unit] generally meets most guideline requirements of a Micro WTS Facility, the siting of the facility on existing billboards does not.
- This determination shall not apply to installations within the public right-of-way under the jurisdiction of the Department of Public Works (DPW).

**Please note that a Letter of Determination is a determination regarding the classification of uses and interpretation and applicability of the provisions of the Planning Code. This Letter of Determination is not a permit to commence any work or change occupancy. Permits from appropriate Departments must be secured before work is started or occupancy is changed.**

**APPEAL:** If you believe this determination represents an error in interpretation of the Planning Code or abuse in discretion by the Zoning Administrator, an appeal may be filed with the Board of Appeals within 15 days of the date of this letter. For information regarding the appeals process, please contact the Board of Appeals located at 1650 Mission Street, Room 304, San Francisco, or call (415) 575-6880.

Sincerely,



Scott F. Sanchez  
Zoning Administrator

cc: Ashley Lindsay, Planner  
Citywide Neighborhood Group Mailing List