

**MACKENZIE & ALBRITTON LLP**

155 SANSOME STREET, SUITE 800  
SAN FRANCISCO, CALIFORNIA 94104

---

TELEPHONE 415 / 288-4000  
FACSIMILE 415 / 288-4010

August 16, 2022

**VIA EMAIL**

Hearings Officer  
Tahoe Regional Planning Agency  
128 Market Street  
Stateline, Nevada 89449

Re: Verizon Wireless Application, File No. ERSP2022-0330  
Telecommunications Facility, 1200 Tunnel Creek Road, Incline Village  
Hearings Officer Agenda Item V(D), August 18, 2022

Dear Hearings Officer:

We write on behalf of Verizon Wireless to respond to concerns regarding its proposed monopole wireless facility in Incline Village (the “Proposed Facility”) raised by resident Joyce Bock. Verizon Wireless agreed to continue your August 4, 2022 hearing in order to meet with Ms. Bock and agency staff on-site on August 12, 2022. A Verizon Wireless consultant also took photographs from her property in order to prepare the attached photosimulations. Below, we address Ms. Bock’s comments regarding views, alternatives, the local hiking trail and property values. None of these concerns uncover any grounds for denial. As confirmed by the staff report, Verizon Wireless has provided ample evidence to demonstrate that the Proposed Facility complies with all Tahoe Regional Planning Agency (“TRPA”) requirements for approval. We urge you to approve Verizon Wireless’s application.

**The Proposed Facility Will Not Impact Scenic Views.**

Ms. Bock is concerned that the Proposed Facility would impact the view of Lake Tahoe from her residence, which is uphill 375 feet southeast of the Proposed Facility and 105 feet greater in elevation. Verizon Wireless designed its facility as a 45-foot monopole which will be placed among established pine trees of similar and greater height. With no protrusion above that treeline as seen from her residence, the Proposed Facility will pose no more view impact than the existing trees. This is demonstrated in the photosimulations attached as Exhibit A, with two vantage points from Ms. Bock’s deck and one from her access road. Furthermore, a TRPA condition of approval requires a “random branch pattern that mimics the branch pattern of adjacent trees,” which will help the Proposed Facility blend with the surrounding trees.

As confirmed by your August 4, 2022 staff report, the Proposed Facility satisfies TRPA's scenic resource criteria. It will not be located within a roadway scenic resource view, because it is on the opposite side of Highway 28 from the lake. It will not impact the scenic shoreline view from the lake because it will be located on a slope covered with established trees. A condition of approval will require Verizon Wireless to plant five additional trees or to conduct equal or superior scenic mitigation as approved by TRPA. Because the Proposed Facility will not impact scenic views, this concern must be dismissed.

**There Are No Better Alternatives on Government Property to the South.**

Ms. Bock suggested moving the Proposed Facility to government property south of her residence, but those federal and state lands were already discounted in Verizon Wireless's Alternatives Analysis, attached as Exhibit B. The U.S. Forest Service Property to the southwest (Alternative 19) is too far south for a facility to serve the significant gap in Verizon Wireless coverage in Incline Village, and signal would be blocked by the hill to the north where the Proposed Facility will be located. A facility on that steeply sloped property would require extensive grading, posing significant environmental and visual impact to federal forest lands, if feasible at all.

The portion of Lake Tahoe Nevada State Park to the southeast (Alternative 20) is undeveloped backcountry even farther from the coverage objective, and a telecommunications facility there would require a new access road and utility lines across steep terrain, posing significant environmental impacts. In sum, these two alternatives on government property would be infeasible to provide service and would pose more impact than the Proposed Facility. As confirmed by the Alternatives Analysis, these alternatives must be rejected.

**The Proposed Facility Will Pose Minimal Impact to the Hiking Trail.**

Ms. Bock questioned the impact on views from the Tunnel Creek Trail, a public trail that runs east of the Proposed Facility across the same privately-owned parcel. The Proposed Facility was designed to minimize its appearance from this vantage point. As shown in the photosimulations attached as Exhibit C, the base on the monopole will be over the bank, 13 feet below the trail. Established pine trees closer to the trail are taller and will provide screening. The equipment shelter, also downslope from the trail, will be designed as a log cabin with a gabled roof, shorter than the existing utility pole next to it. Verizon Wireless will install a wood fence along the edge of the trail near the cabin. These measures will minimize any visual impact of the Proposed Facility as viewed from this portion of the Tunnel Creek Trail. There are no TRPA scenic protection standards for this trail. Any claim of significant view impact is overstated, and this concern must be dismissed.

**The Proposed Facility Will Not Affect Property Values.**

Lastly, Ms. Bock claims that cell towers lower property values, but that is unfounded speculation. As noted, the Proposed Facility will pose no scenic view impact as seen from her residence. Allegations of property value decline based on concern over radio frequency emissions are preempted from consideration by the federal Telecommunications Act, which bars consideration of the environmental effects of radio frequency emissions if a proposed facility complies with the FCC's exposure guidelines. 47 U.S.C. § 332(c)(7)(B)(iv). This federal law also bars efforts to circumvent preemption of health concerns through proxy concerns such as property values. *See, e.g., AT&T Wireless Servs. of Cal. LLC v. City of Carlsbad*, 308 F. Supp. 2d 1148, 1159 (S.D. Cal. 2003) ("Thus, direct or indirect concerns over the health effects of RF emissions may not serve as substantial evidence to support the denial of an application"); *Calif. RSA No. 4, d/b/a Verizon Wireless v. Madera County*, 332 F. Supp. 2d 1291, 1311 (E.D. Cal. 2003).

The Joint Venture Silicon Valley Network conducted a formal study with the Santa Clara County Association of Realtors and the Silicon Valley Association of Realtors, which found that "[i]t is quite clear from the data that the distance from a wireless facility has no apparent impact on the value or sale price of a home." Joint Ventura Silicon Valley *Wireless Facilities Impact on Property Values*, 2012, p. 5.

Property values are not a factor for TRPA's evaluation of a proposed telecommunications facility, and this concern must be dismissed.

**Conclusion**

Verizon Wireless has worked diligently to design a facility that can serve its coverage gap in Incline Village while posing as little impact as possible. The Proposed Facility was already approved by Washoe County in 2020, and TRPA staff have recommended approval. The concerns raised by Ms. Bock do not reveal any non-compliance with TRPA regulations, and so do not warrant denial. We urge you to follow staff's recommendation, and approve the Proposed Facility.

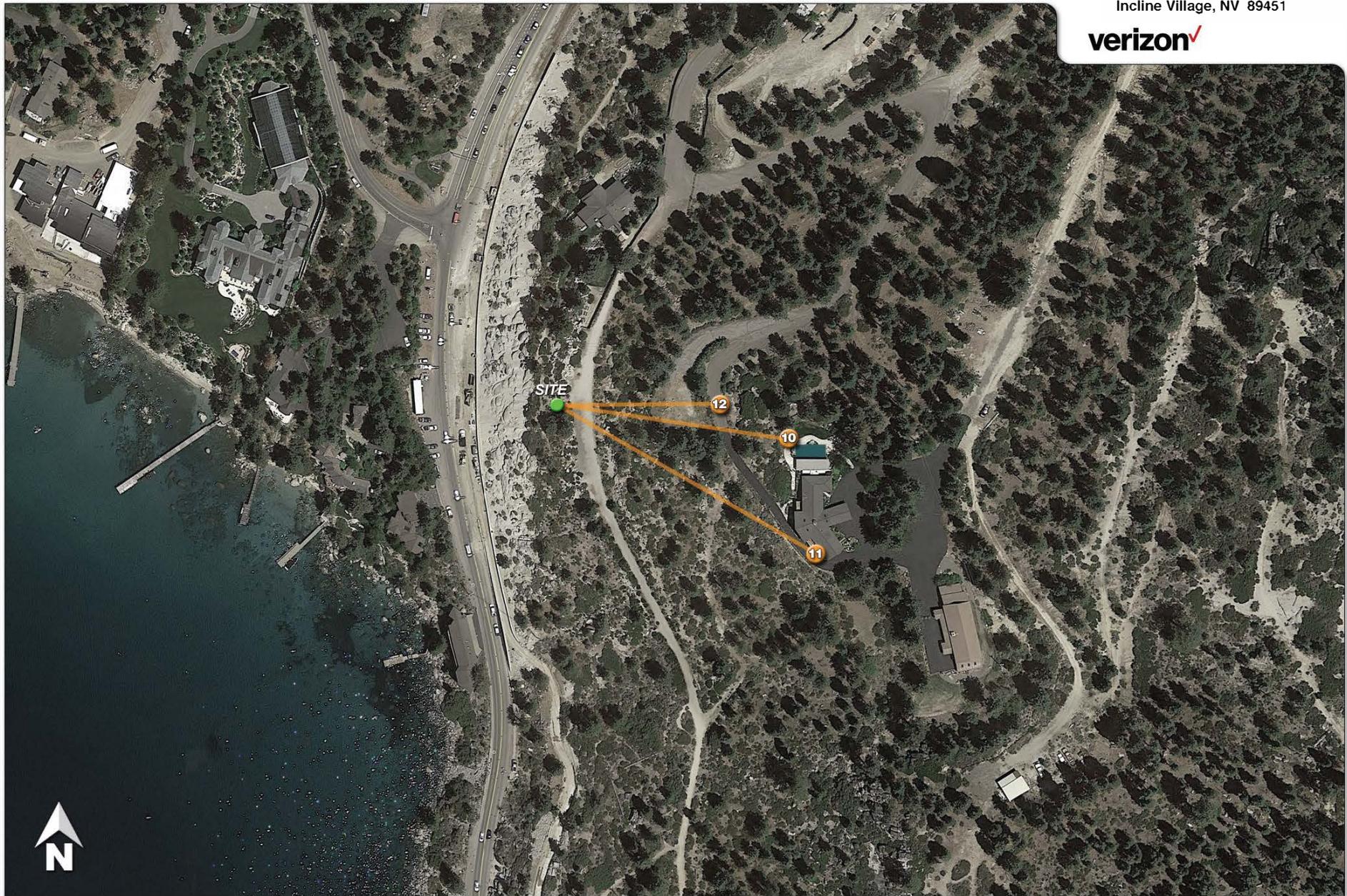
Very truly yours,  
  
Paul B. Albritton

cc: John Marshall, Esq.  
Paul Nielsen

**Schedule of Exhibits**

- Exhibit A: Photosimulations with views from Joyce Bock property
- Exhibit B: Alternatives Analysis
- Exhibit C: Photosimulations with views from Tunnel Creek Trail

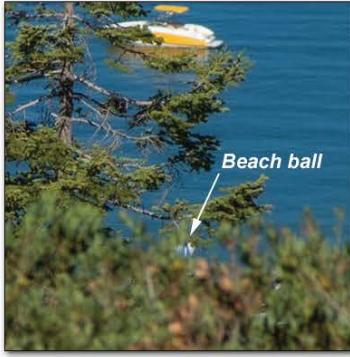
Supplemental aerial photograph showing the viewpoints for the special request photosimulations.



## Ponderosa Ranch

1200 Tunnel Creek Road  
Incline Village, NV 89451

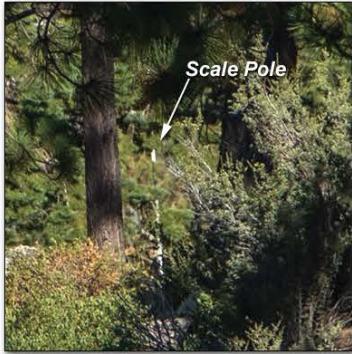
verizon✓



Photosimulation of the view from the edge of the pool deck on the north side of the residence at 1500 Tunnel Road. A 45 ft scale pole was erected to represent the top of the faux branches of the monopine, and is visible in the inset.



## Existing and Proposed (no visible change)



Photosimulation of the view from the south edge of the residence, standing on the deck of the residence at 1500 Tunnel Road. A 45 ft scale pole was erected to represent the placement and height of the monopine, and is partially visible in the inset.

**Ponderosa Ranch**  
1200 Tunnel Creek Road  
Incline Village, NV 89451

**verizon**✓

11



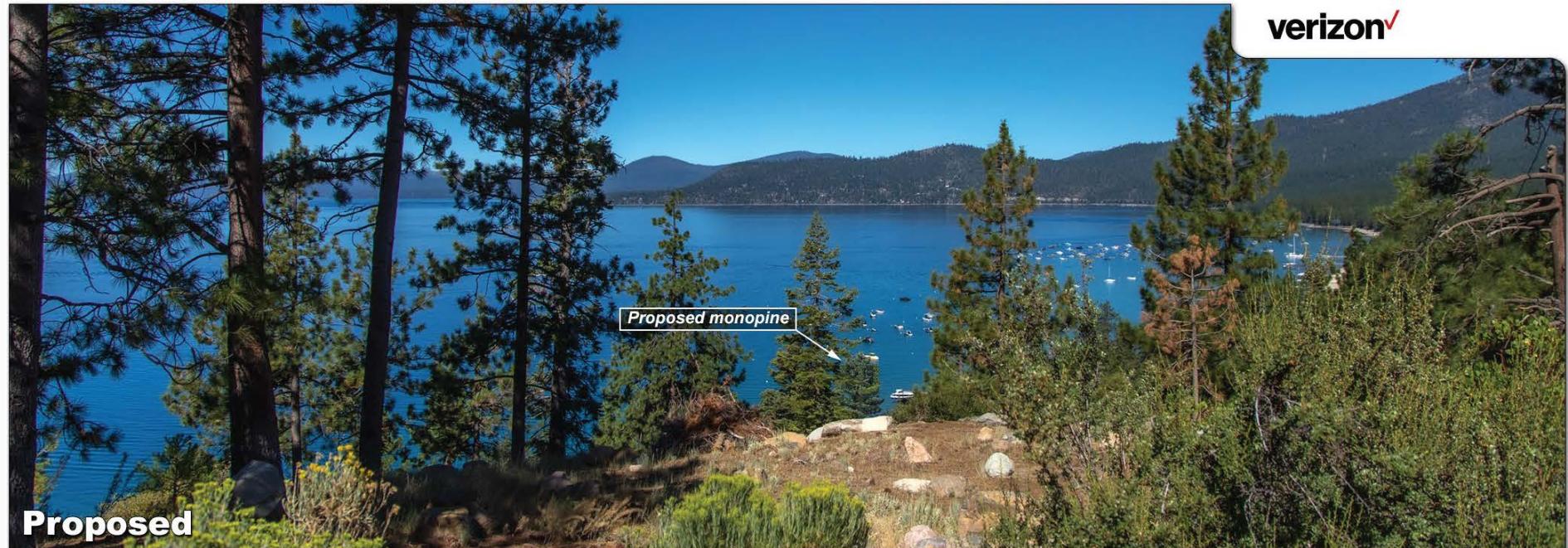
**Existing and Proposed (no visible change)**

12



## Existing

Photosimulation of the view looking due west from the driveway that leads to 1500 Tunnel Road.



## Proposed

# verizon<sup>✓</sup>

## Alternatives Analysis

### Ponderosa Ranch

1200 Tunnel Creek Road  
Incline Village, Washoe County



**May 21, 2020**

**Summary of Site Evaluations  
Conducted by Verizon Wireless**

## **TABLE OF CONTENTS**

I.	<b>Executive Summary .....</b>	<b>3</b>
II.	<b>Significant Gap.....</b>	<b>3</b>
III.	<b>Methodology .....</b>	<b>3</b>
	<i>Code Location Preferences.....</i>	<i>4</i>
	<i>Code Requirements for New Monopoles.....</i>	<i>4</i>
	<i>Code Height Standards.....</i>	<i>5</i>
IV.	<b>Analysis .....</b>	<b>5</b>
	<i>Collocation Review.....</i>	<i>6</i>
	1. Snowflake Lodge Towers .....	7
	2. Hyatt Regency Lake Tahoe Resort .....	8
	<i>Existing Structures.....</i>	<i>9</i>
	3. Incline Village GID Water Tank.....	10
	<i>New Monopoles Not Requiring Proof of a Gap.....</i>	<i>11</i>
	4. Ponderosa Ranch LLC Property .....	13
	5. Spitsen Lumber Co. ....	15
	6. T-Bird Warehouse.....	16
	7. Alpine Self-Storage.....	17
	8. Incline Storage .....	18
	9. Boat Yard.....	19
	10. Waste Management Incline Village Transfer Station.....	20
	11. Incline Village GID Public Works Facility .....	21
	12. Incline Village GID Treatment Plant.....	22
	13. Sierra Pacific Electric Substation.....	23
	<i>New Monopoles Requiring Proof of a Gap.....</i>	<i>24</i>
	14. Proposed Facility .....	25
	15. Tunnel Creek Road Property .....	27
	16. Tunnel Creek Café Property .....	28
	17. Lake Tahoe Trust Property .....	29
	18. Tunnel Creek Road MDR Zone.....	30
	19. United States Forest Service Property .....	31
	20. Lake Tahoe Nevada State Park .....	32
V.	<b>Conclusion .....</b>	<b>33</b>

### **Map of Alternatives**

## **I. Executive Summary**

Verizon Wireless must fill a significant gap in service in the southeast Incline Village area. Based on a review of existing structures and 20 specific alternatives described in the following analysis, Verizon Wireless believes that placing antennas on a 45-foot tower camouflaged as a pine tree (the “Proposed Facility”) constitutes the least intrusive feasible alternative to provide service to the significant gap, based on the values expressed in the Washoe County Development Code (the “Code”).

## **II. Significant Gap**

There is a significant gap in Verizon Wireless network service in the Ponderosa Ranch and Mill Creek areas of Incline Village, as well as along Highway 28 to the south. There is no reliable LTE in-building or in-vehicle service along portions of both Highway 28 and Lakeshore Boulevard, extending west to Country Club Drive. Areas lacking in-building service include residential neighborhoods, the vicinity of the Hyatt Regency, and businesses in commercial areas along the highway and Country Club Drive. Additionally, increasing growth in demand for voice and data services compromises network accessibility and reliability in the area, particularly during summer and winter recreation seasons. (Collectively, the “Significant Gap”)

The Significant Gap is described in detail in the *Statement of Verizon Wireless Radio Frequency Design Engineer Jennifer Valencia* (the “RF Engineer’s Statement”). To remedy the Significant Gap and ensure reliable service, Verizon Wireless must build a new macro facility.

## **III. Methodology**

Once it has identified a significant gap, Verizon Wireless seeks to find a location and design that will provide required network service through the “least intrusive means” based upon the values expressed by local regulations.

In addition to seeking the least intrusive alternative, sites proposed by Verizon Wireless must be feasible. In this regard, Verizon Wireless reviews the available height and equipment space, radio signal propagation, proximity to end users, access roads, elevation, slope, terrain and other critical factors such as a willing landlord in completing its site analysis.

## ***Code Location Preferences***

The Code sets forth location preferences that apply to all wireless facilities, ranked from most- to least-preferred. These include existing structures, collocations and new poles. The preferences are listed in order below, with respect to the zones in the gap area. Code § 110.324.45.

(Existing Structure/Collocation options)

- Façade-mounted antennas in GC, PSP, TC and PR zones
- Rooftop-mounted antennas in those zones, or placement on utility structures
- Collocation with existing wireless facilities

Applicants must justify why the above three options are not chosen in order to use the following, including the new pole options:

- Existing “specialty poles” for public, utility or non-wireless communications purposes (e.g., flagpole, lamp post, field backstop)
- Façade-mounted antennas outside GC, PSP, TC, and PR zones
- Rooftop-mounted antennas outside those zones
- Other “specialty poles” aside from those described above
- Commercial signage

(New pole options)

- New slimline monopoles
- New monopoles
- New lattice towers

## ***Code Requirements for New Monopoles***

New monopoles may not be placed within 1,000 feet of designated public trails, unless proven necessary to fill a significant gap. This setback applies to only certain trails, designated in the adopted Regional Open Space Plan or an adopted Washoe County Park District Master Plan. Code § 110.324.50(e)(10)(i).

New monopoles are allowed in the following zones in the gap area with a special use permit:

- GC, PSP, TC, PR, MDR and HDR zones
- LDS, MDS, HDS and MDU zones, if proven necessary to fill a significant gap
- GR and OS zones, subject to certain placement standards

Code §§ 110.324.50(e)(1), (2).

Monopoles should be designed to replicate structures or natural features/vegetation in the immediate vicinity. Code § 110.324.50(e)(8).

### ***Code Height Standards***

Rooftop antennas may not extend over 10 feet above the highest point of the roof. Code § 110.324.50(b)(4). On specialty poles and commercial signs, antennas may not extend above the pole or sign on which located more than one-third the vertical length of the existing pole or sign face. Code §§ 110.324.50(c)(1), 110.324.50(d)(1).

For monopoles in the local residential, commercial, PSP and PR zones, height is limited to primary zone height plus 10 feet. Code § 110.324.50(e)(1). Monopoles of stealth design (e.g., trees) may extend an additional 25 percent over the height otherwise allowed. Code § 110.324.50(e)(3).

Where applicants must prove a monopole is necessary to fill a significant gap, height is limited to either:

- (1) in residential zones, the primary zone height plus 10 feet, or
- (2) outside residential zones, additional height based on distance from residential zones or paved rights-of-way

Code § 110.324.55(c); Table 110.324.55.1.

## **IV. Analysis**

Verizon Wireless first reviewed the area of the Significant Gap for collocation opportunities and existing structures. Finding none of these to be feasible to serve the gap, Verizon Wireless next reviewed placement of a new monopole in areas where no proof of a gap is required (certain zones beyond the 1,000-foot trail setback). As none of those options were feasible, Verizon Wireless next investigated placement of a new monopole within areas requiring proof of a gap, identifying the Proposed Facility location and considering several other options.

Coverage maps are provided to illustrate why certain alternatives cannot serve the Significant Gap. Coverage maps depict the anticipated level of signal, and therefore the projected LTE coverage provided by a wireless facility at a given location. In the Incline Village area, 50 percent of spectrum licensed by the FCC to Verizon Wireless is in the high-frequency AWS and PCS bands. Coverage maps have been prepared using the AWS band. The AWS and PCS bands use similar frequencies and have similar propagation.

Referenced signal receive power (RSRP) is a measurement of signal level in decibels (dBm), which decreases due to distance, terrain and other factors. The RSRP coverage thresholds are as follows. Unshaded areas on maps do not receive reliable outdoor service.

	<b>In-building &gt;= -85 dBm.</b> Green depicts good coverage that meets or exceeds thresholds to provide reliable network coverage in homes and in vehicles.
	<b>In-vehicle &gt;= -95 dBm.</b> Yellow depicts reliable in-vehicle coverage only.
	<b>Outdoor &gt;= 105 dBm.</b> Gray depicts reliable outdoor service only.

### ***Collocation Review***

While collocation with existing wireless facilities is the third location preference under the Code described above, Verizon Wireless typically reviews collocation opportunities first because they may allow for consolidation of wireless infrastructure, if feasible. Verizon Wireless evaluated collocation with two existing wireless facilities in the greater area, as described below.

The Code's first two location preferences are facade and rooftop-mounted facilities in certain zones, which, for ease of reference, are addressed and discounted below on Page 9 in the section about existing structures (that do not support wireless facilities).

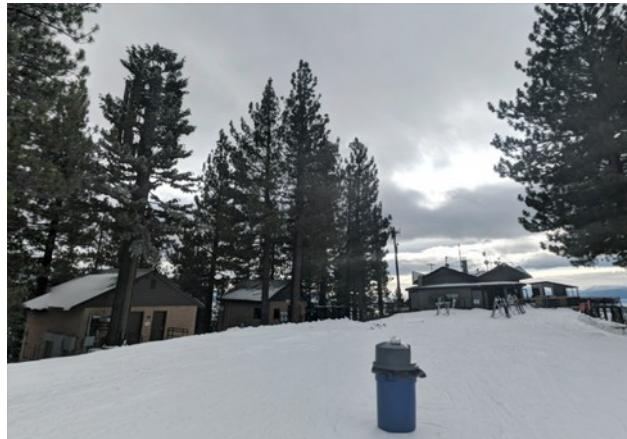
## 1. Snowflake Lodge Towers

Address: 1210 Ski Way

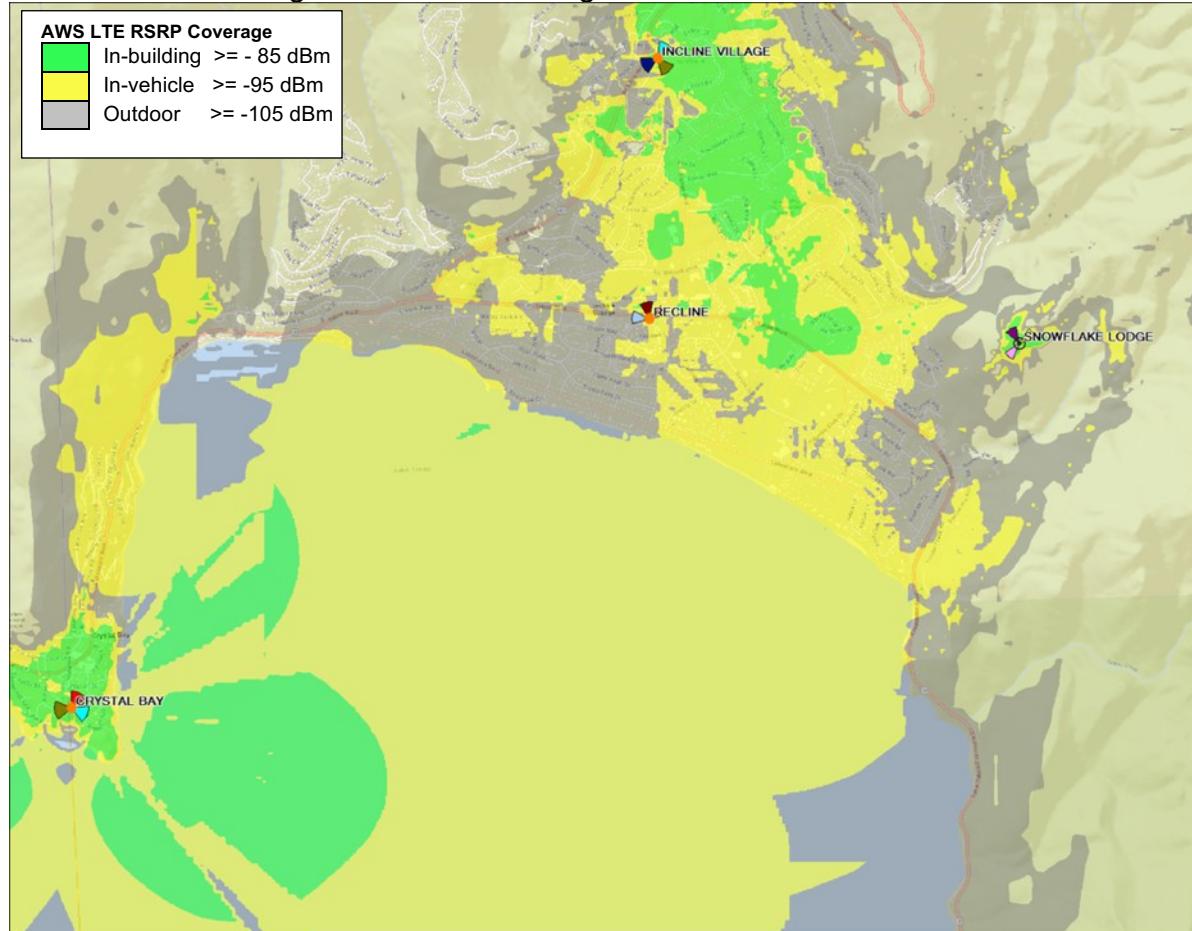
Zoning: PR (Parks and Recreation)

Elevation: 7,410 feet

Verizon Wireless reviewed collocation on towers next to Snowflake Lodge at the top of Diamond Peak ski resort, 1.2 miles northeast of the Proposed Facility and 1,015 feet greater in elevation. Verizon Wireless engineers determined that a facility on these towers cannot serve the Significant Gap. Due to distance and excessive elevation, signal would overshoot the gap area. As shown in the following coverage map, a broad coverage gap would remain, with little overall improvement. Also, at this high-elevation location, antennas would need to point downward toward the water, which reflects radio waves, and it would very difficult to minimize signal interference with other facilities around Lake Tahoe. This is not a feasible alternative to the Proposed Facility.



AWS LTE Coverage at Snowflake Lodge Towers – 37 Foot Antenna Centerline



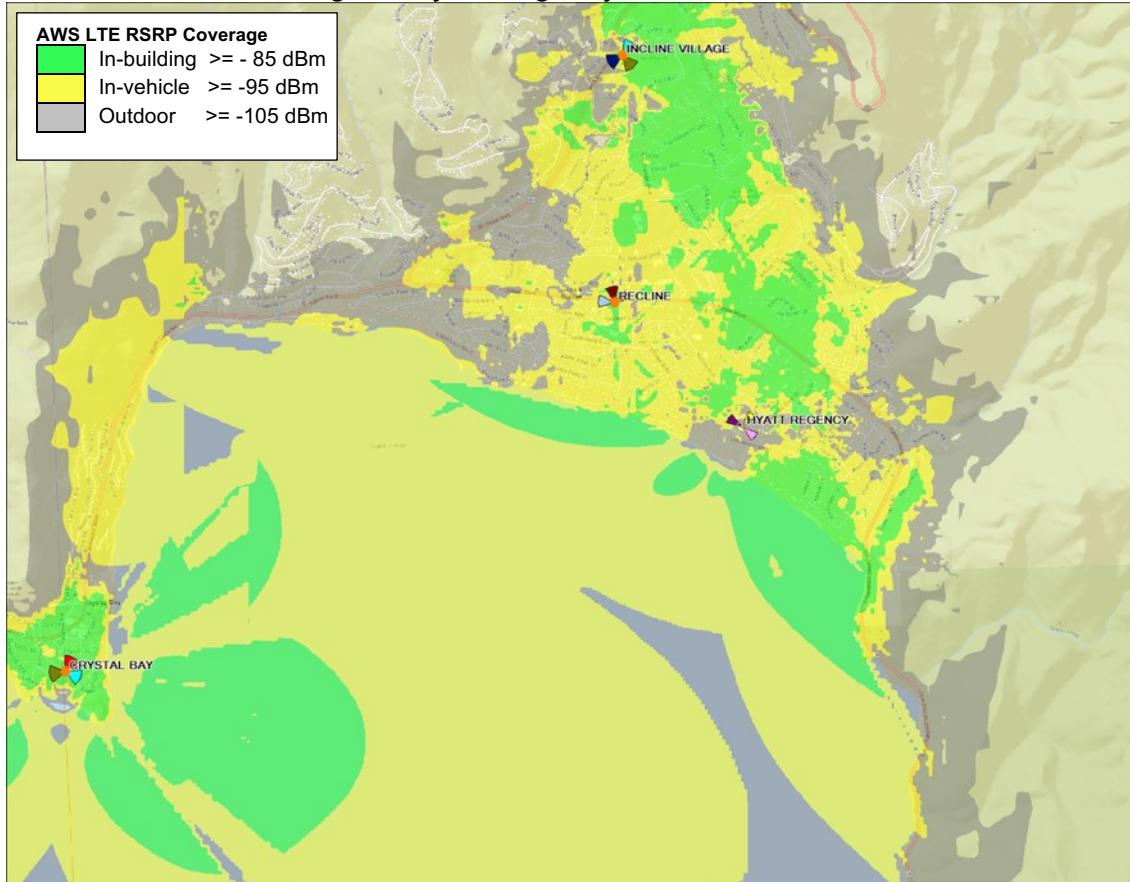
## 2. Hyatt Regency Lake Tahoe Resort

Address: 111 Country Club Drive  
Zoning: TC (Tourist Commercial)  
Elevation: 6,280 feet

Verizon Wireless reviewed collocation on the main hotel building of the Hyatt Regency 0.9 miles northwest of the Proposed Facility. While the ground elevation is 115 feet lower than the Proposed Facility, the building is some 10 stories tall, and antennas on the roof would be at an elevation similar to the Proposed Facility antennas. Verizon Wireless engineers determined that a facility collocated on this building cannot serve the Significant Gap due to distance, as it is too far west. As shown in the following coverage map, in-building coverage would be lacking in residential and commercial areas along Highway 28 north of Lakeshore Boulevard, with in-vehicle coverage also lacking along a portion of the highway. Further, signal would overshoot the hotel and its vicinity, leaving a gap in in-building and in-vehicle service nearby. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Hyatt Regency – 100 Foot Antenna Centerline*



### ***Existing Structures***

Lacking a feasible collocation option, Verizon Wireless considered placement of a new facility on an existing structure within the gap area. As noted, the Code favors placement on building facades or rooftops, utility structures, “specialty poles” and commercial signage.

The only building of significant height in the gap area is the Hyatt Regency, reviewed above, where a facility could not serve the gap as it is too far west. Similarly, a facility on commercial buildings along Country Club Drive across from the Hyatt Regency could not serve the gap in areas to the east, particularly given their much lower height (one or two stories).

In the GC, PSP and TC zones east of Highway 28 and north of the Proposed Facility, buildings are limited to one or two stories in height. As described below under Alternatives 5 to 11, monopole options in the same area would be infeasible to serve the gap, even with high antenna centerlines of 84 to 103 feet. Antennas confined to the much lower building facades or rooftops would have substantially smaller coverage footprints, even with the 10 additional feet in height allowed, and likewise would be unable to serve the gap.

Verizon Wireless identified one utility structure in the gap area of a type often used to support antennas: the water tank reviewed as Alternative 3 below.

No specialty poles were identified. Poles such as flagpoles or backstops would not work because of limited height, and inability to structurally support the six panel antennas and other network gear required to serve the gap.

The few commercial signs along Highway 28 are no taller than the adjacent buildings, and even with the one-third increase in height allowed, a facility on those signs could not serve the gap due to low height and inability to support six panel antennas.

As described below under Alternative 4, Ponderosa Ranch LLC is not a willing landlord, and Verizon Wireless did not consider any structures on its properties.

### 3. Incline Village GID Water Tank

Address: 1250 Sweetwater Drive

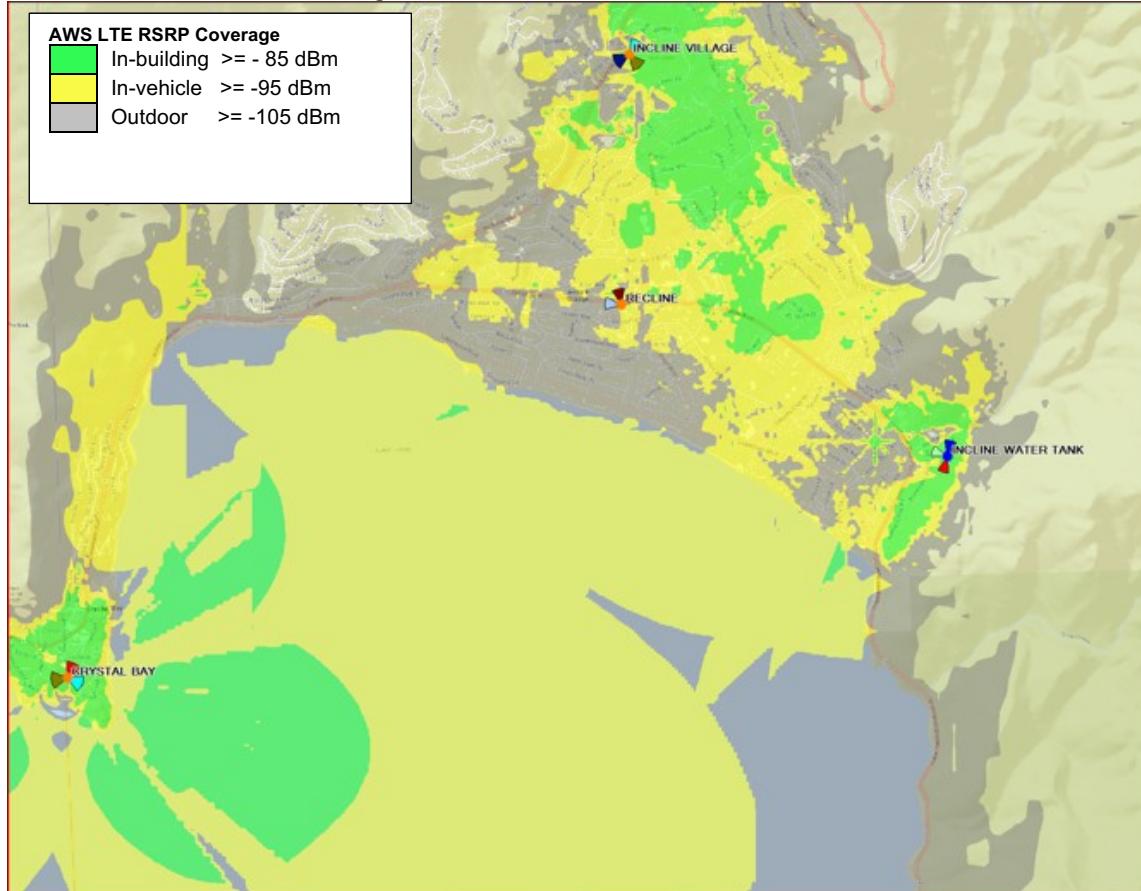
Zoning: PSP (Public and Semi-Public Facilities)

Elevation: 6,475 feet

Verizon Wireless reviewed placement of a facility on this water tank 0.6 miles northeast of the Proposed Facility and 80 feet greater in elevation. Verizon Wireless engineers determined that a facility on the water tank cannot serve the Significant Gap due to distance. As shown in the following coverage map, in-building and in-vehicle service would be lacking in the Mill Creek residential area, along Country Club Drive, and along Highway 28 south of town. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Water Tank – 25 Foot Antenna Centerline*



### ***New Monopoles Not Requiring Proof of a Gap***

With no feasible existing structure options, Verizon Wireless next reviewed placement of a new pole to support its antennas. A slimline monopole would not be feasible because of limited structural capacity to support six panel antennas and other network gear. Also, panel antennas must protrude from a pole to avoid crowding for successful signal propagation. Verizon Wireless opted to place a new stealth monopole disguised as a pine tree, a design which camouflages protruding antennas.

Under the Code, new monopoles in certain locations require proof of a significant gap, including sites within 1,000 feet of designated trails and within certain zones (locally, the LDS, MDS, HDS and MDU zones). Verizon Wireless first looked at options outside those areas.

#### Beyond 1,000 Feet from Designated Trails

In the gap area, the only existing/proposed trail designated in the 2019 *Washoe County Regional Parks & Open Space Master Plan* is the East Shore Trail. The Tunnel Creek/Flume Trail is not designated, but it begins near the East Shore Trail trailhead and runs nearly parallel southward for some distance.

On the following map, the white dashed line shows an approximate 1,000-foot radius distance from the East Shore Trail, which is the white solid line. With respect to the trail setback, monopoles within the 1,000-foot radius require proof of a gap, while those beyond do not.

#### GC, PSP and TC Zones

A new monopole is allowed in these zones with no need to prove a significant gap. In the following map, it is apparent that the GC and PSP zones are over 1,000 feet from the East Shore Trail.

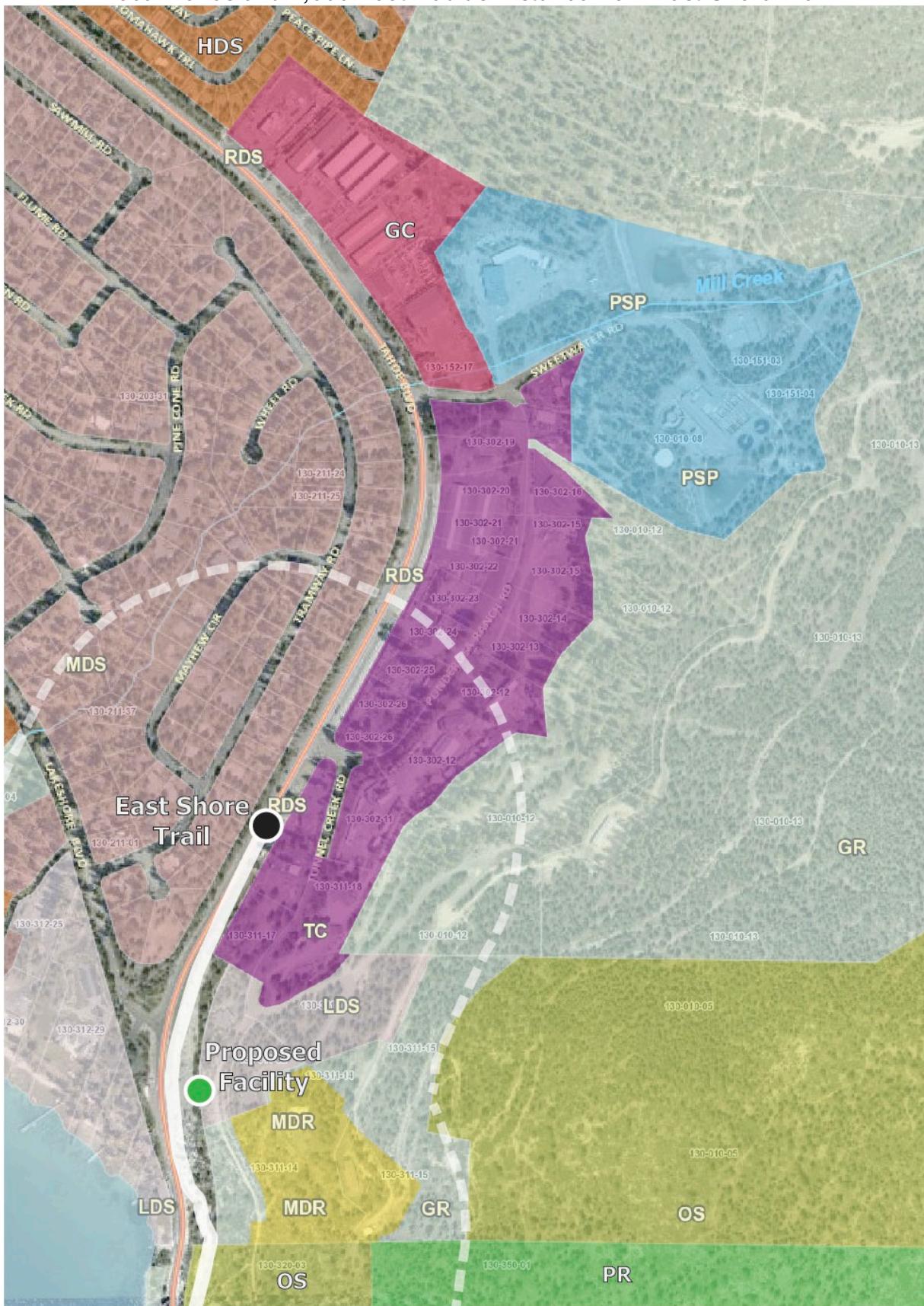
Those TC zone parcels that are over 1,000 feet from the designated trail are owned by Ponderosa Ranch LLC, which is not a willing landlord, as explained under Alternative 4.

#### Height Limits in GC and PSP Zones

The Code height limits would allow a stealth monopole facility of 112 foot in the GC zone and 93.75 feet in the PSP zone. This is consistent with the County's height calculation for a prior application in a nearby GC zone, WSUP19-0001.

Verizon Wireless would design a stealth treepole facility with the antenna centerline eight to nine feet below the top, allowing faux branches to extend above and beyond antennas for a realistic appearance. Thus, the antenna centerline used to evaluate propagation is 103 feet in the GC zone and 84 feet in the PSP zone.

*Local Zones and 1,000 Foot Radius Distance from East Shore Trail*



#### **4. Ponderosa Ranch LLC Property**

Address: Various Parcels East of Highway 28

Zoning: TC, GR and LDS (Tourist Commercial, General Rural, and  
Low-Density Suburban)

Elevation: Various

Verizon Wireless considered the large property owned by Ponderosa Ranch LLC, consisting of 21 contiguous parcels northeast of the Proposed Facility, shown in blue on the map on the following page. These parcels span the TC, GR and LDS zones, totaling over 180 acres in the immediate vicinity, with additional acreage beyond. One small parcel is due east of the Proposed Facility parcel.

Verizon Wireless representative Buzz Lynn of Epic Wireless Group LLP recently contacted Ponderosa Ranch LLC representative Elizabeth Tuoto regarding placement of a wireless facility on the property. In the following email dated April 30, 2020, Elizabeth Tuoto responded that the owners of Ponderosa Ranch are not interested in a wireless facility on the property. Lacking a willing landlord, this is not a feasible alternative to the Proposed Facility.

**From:** Elizabeth Tuoto <Elizabeth@nevadapacific.com>  
**Sent:** Thursday, April 30, 2020 2:34 PM  
**To:** Buzz Lynn <Buzz.Lynn@epicwireless.net>  
**Cc:** Melissa Vios <Melissa.Vios@epicwireless.net>; Kortick, Bradford <bradford.kortick@verizonwireless.com>; Sean O'Connell <Sean@nevadapacific.com>  
**Subject:** RE: Verizon - Ponderosa Ranch

Hi Buzz:

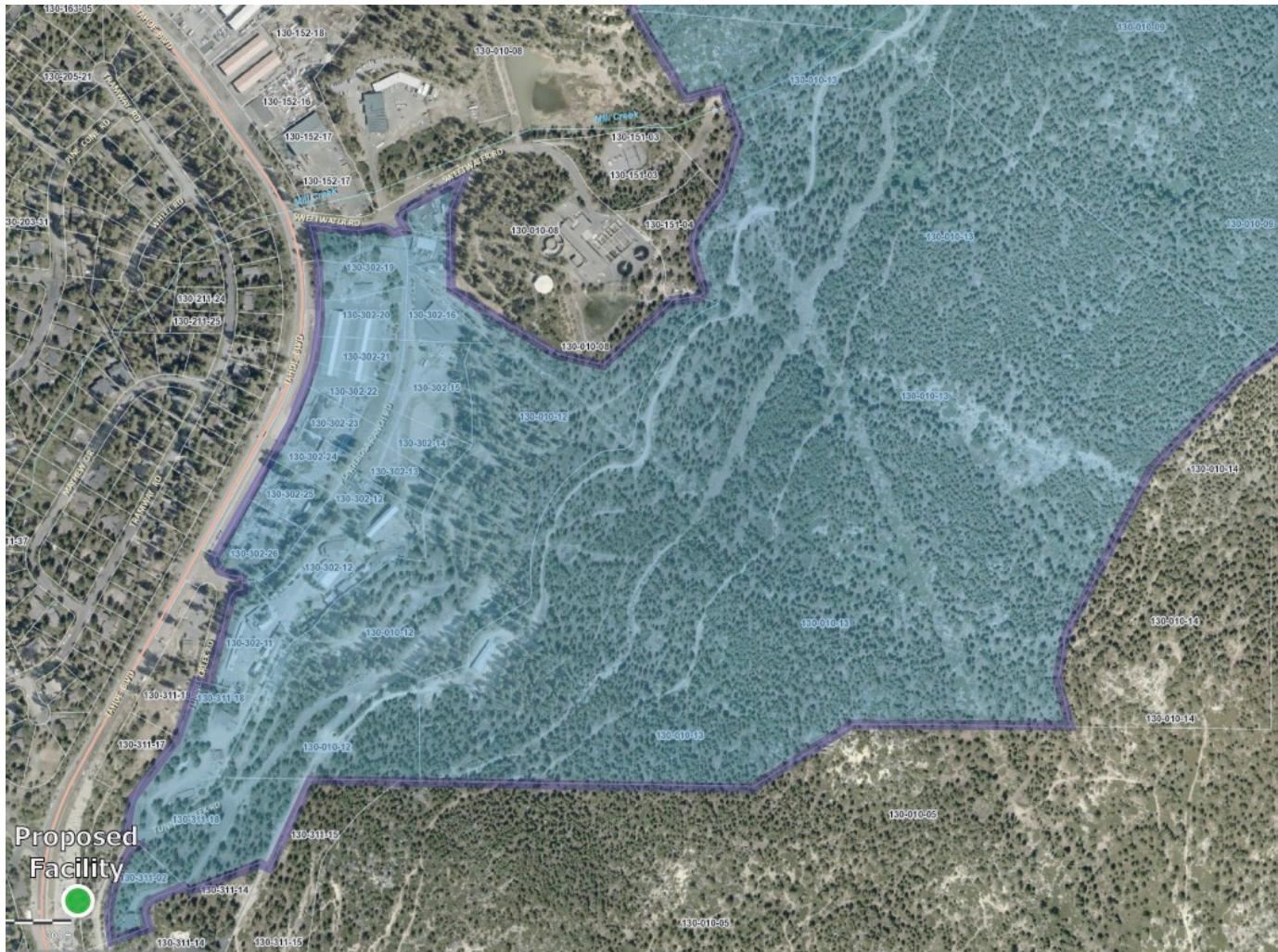
I hope you are doing well and staying healthy. The owners of the Ponderosa Ranch are not interested in locating a cell tower on the ranch property. Thank you for reaching out to us.

If you have any questions, please do not hesitate to contact me.

Kindest regards,

Elizabeth J. Tuoto, Asset Manager  
Nevada Pacific Consulting, LLC  
926 Incline Way, Suite 100  
Incline Village, NV 89451  
Direct: 775.298.3057  
Cell: 775.762.2070  
Email: Elizabeth@Nevadapacific.com

## *Ponderosa Ranch LLC Parcels*



For Alternatives 5-12 below, an antenna sector could not point west or southwest toward Lake Tahoe, because signal propagating across water leads to interference with existing facilities around the lake, as noted above. Without that antenna sector, coverage would be compromised in areas west or southwest along Lakeshore Boulevard, including the Mill Creek residential neighborhood. Also, signal would be blocked from serving Highway 28 south of Lakeshore Boulevard by the intervening ridge on which the Proposed Facility is located. Further, Alternatives 5-12 are at the base of undeveloped steep terrain, where a north- or east-facing antenna sector would be of little use, and of no benefit to serving the gap.

## 5. Spitsen Lumber Co.

Address: 1054 Tahoe Boulevard

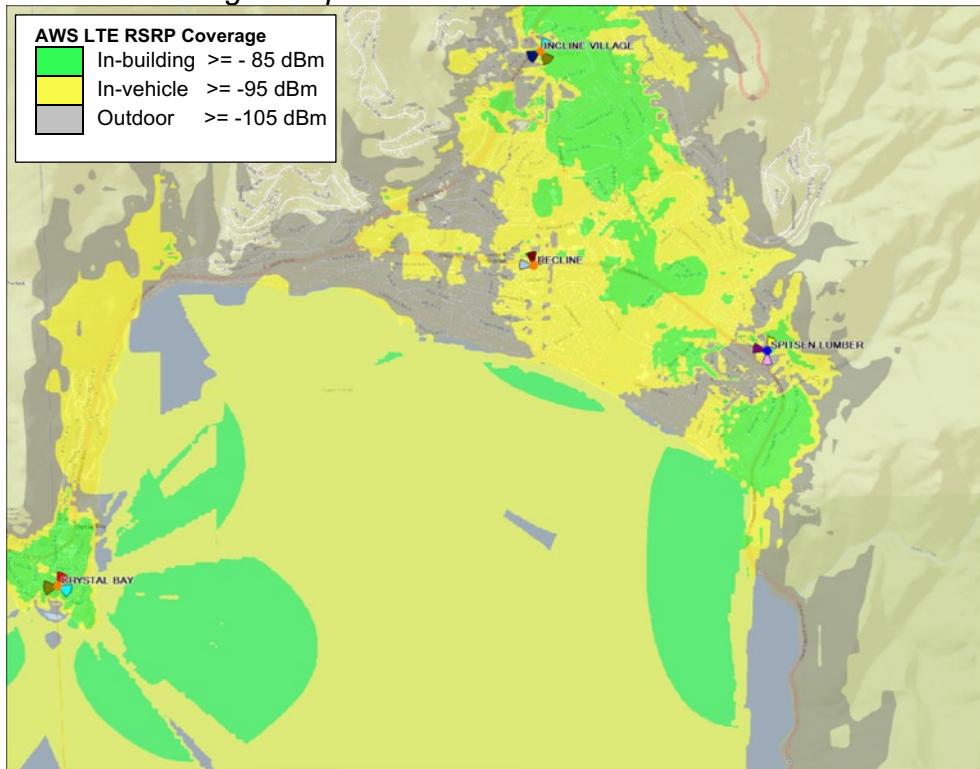
Zoning: GC (General Commercial)

Elevation: 6,400 Feet

Verizon Wireless reviewed this property 0.7 miles north of the Proposed Facility at a similar elevation. Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Highway 28 and Lakeshore Boulevard, including commercial areas along the highway and much of the Mill Creek neighborhood. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Spitsen Lumber Co. – 103 Foot Antenna Centerline*



## 6. T-Bird Warehouse

Address: 1056 Tahoe Boulevard

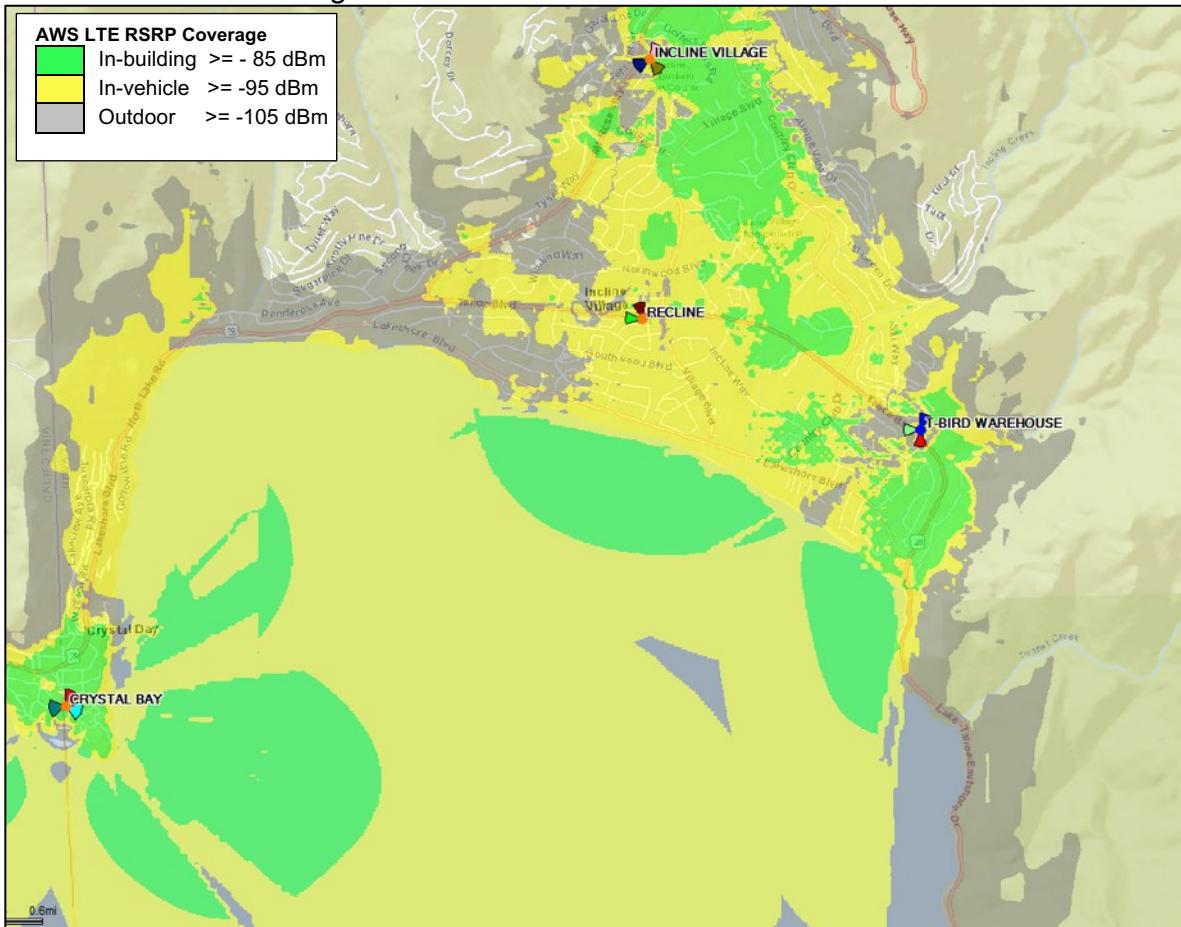
Zoning: GC (General Commercial)

Elevation: 6,375 Feet

Verizon Wireless reviewed this small property 0.7 miles north of the Proposed Facility and 20 feet lower in elevation. The developed area of this narrow property is almost entirely occupied by a warehouse building, with insufficient room to the rear for a wireless facility and no room for access around the building. The undeveloped area in front next to Highway 28 is used for truck loading and parking. Further, Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Highway 28 and Lakeshore Boulevard, including commercial areas along the highway and much of the Mill Creek neighborhood. This is not a feasible alternative to the Proposed Facility.



AWS LTE Coverage at T-Bird Warehouse – 103 Foot Antenna Centerline



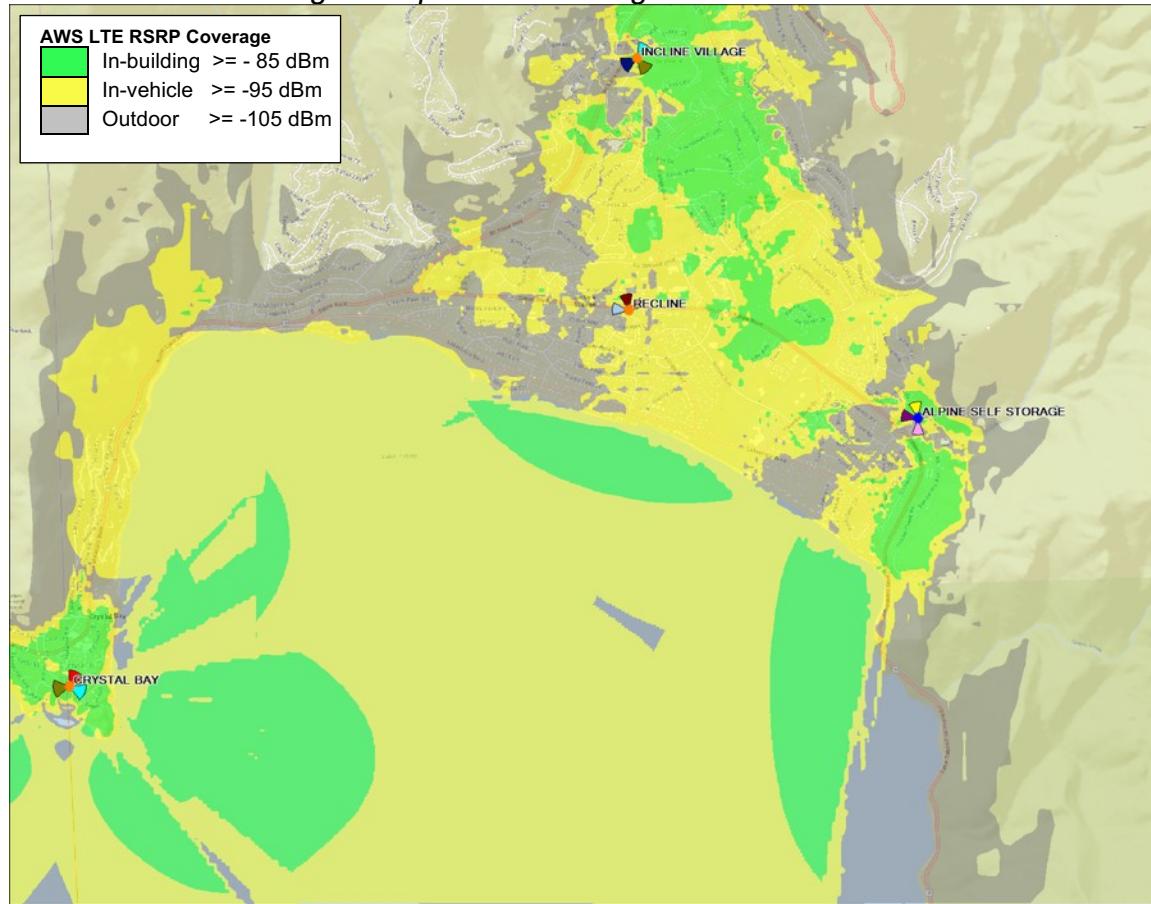
## 7. Alpine Self-Storage

Address: 1058-60 Tahoe Boulevard  
Zoning: GC (General Commercial)  
Elevation: 6,375 Feet

Verizon Wireless reviewed this property 0.7 miles north of the Proposed Facility and 20 feet lower in elevation. Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including much of the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Alpine Self-Storage – 103 Foot Antenna Centerline*



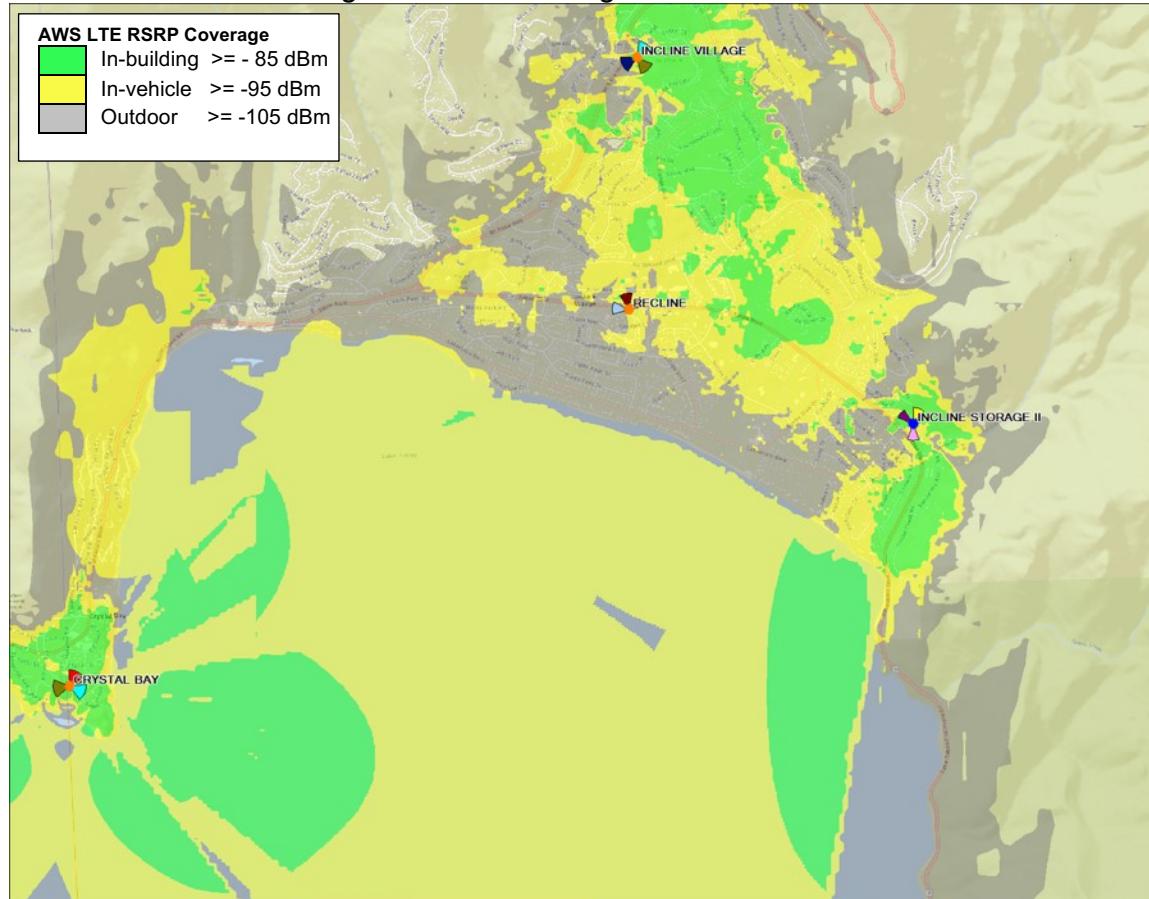
## 8. Incline Storage

Address: 1062 Tahoe Boulevard  
Zoning: GC (General Commercial)  
Elevation: 6,360 Feet

Verizon Wireless reviewed this property 0.6 miles north of the Proposed Facility and 35 feet lower in elevation. Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including much of the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Incline Storage – 103 Foot Antenna Centerline*



## 9. Boat Yard

Address: 1068 Tahoe Boulevard

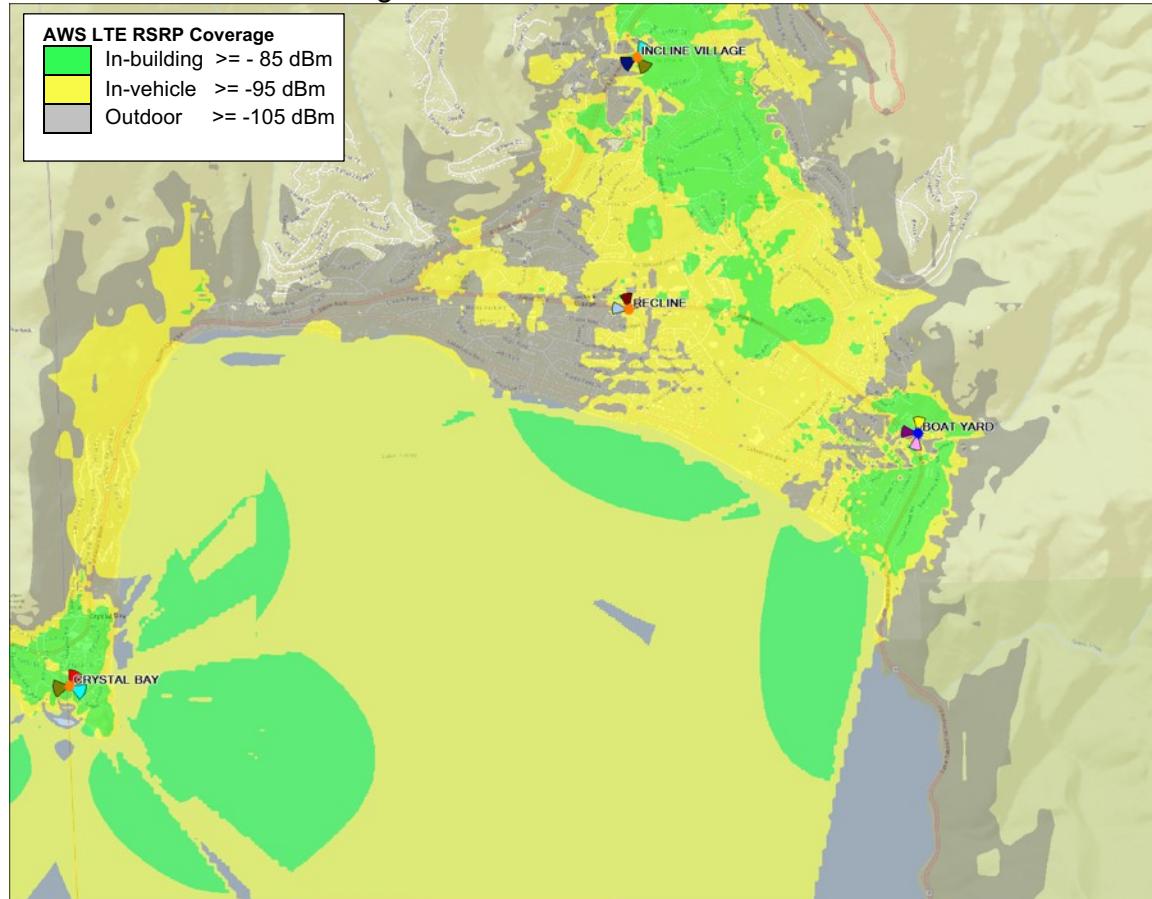
Zoning: GC (General Commercial)

Elevation: 6,350 Feet

Verizon Wireless reviewed this property 0.6 miles north of the Proposed Facility and 45 feet lower in elevation. Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including much of the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at Boat Yard – 103 Foot Antenna Centerline*



## 10. Waste Management Incline Village Transfer Station

Address: 1076 Tahoe Boulevard

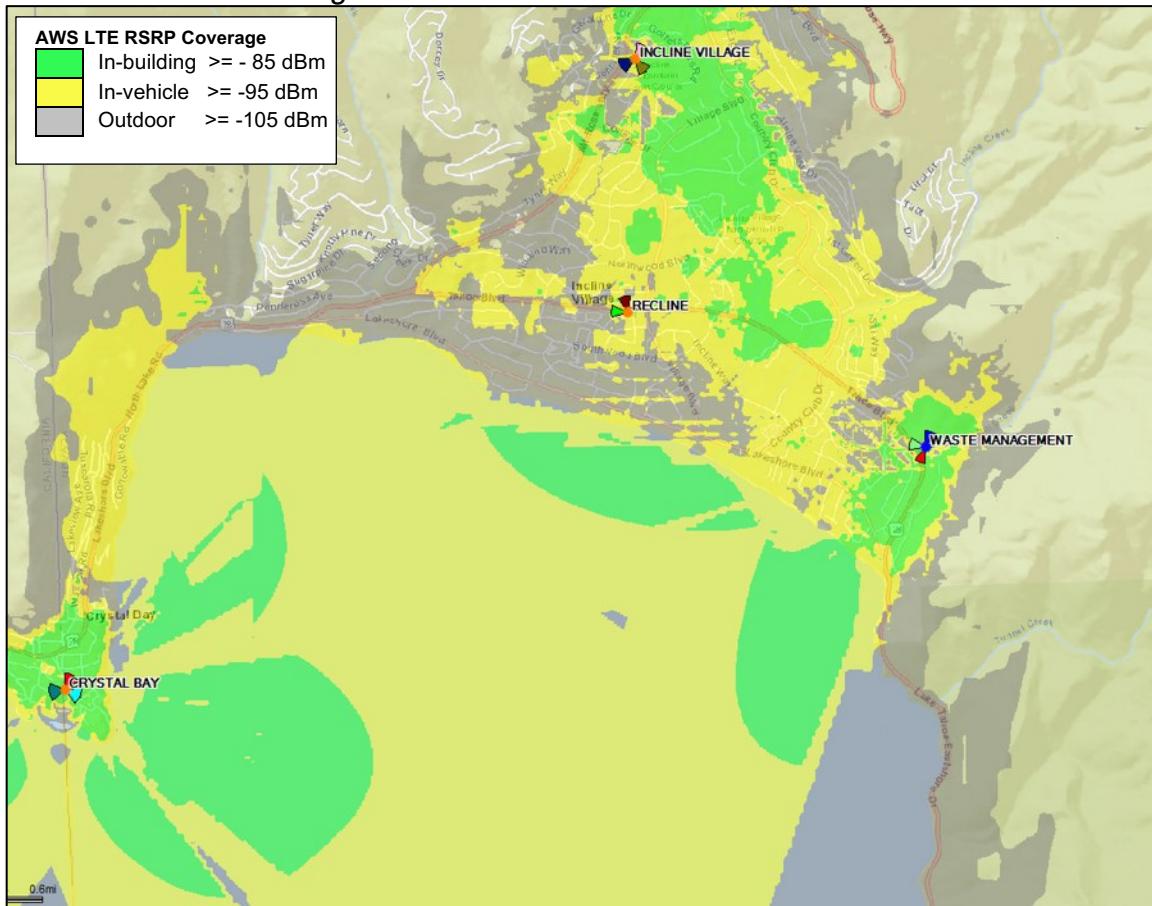
Zoning: GC (General Commercial)

Elevation: 6,350 Feet

Verizon Wireless reviewed this property 0.6 miles north of the Proposed Facility and 45 feet lower in elevation. Verizon Wireless engineers determined that a 112-foot stealth facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including much of the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



AWS LTE Coverage at Transfer Station – 103 Foot Antenna Centerline



## 11. Incline Village GID Public Works Facility

Address: 1220 Sweetwater Road

Zoning: PSP (Public and Semi-Public Facilities)

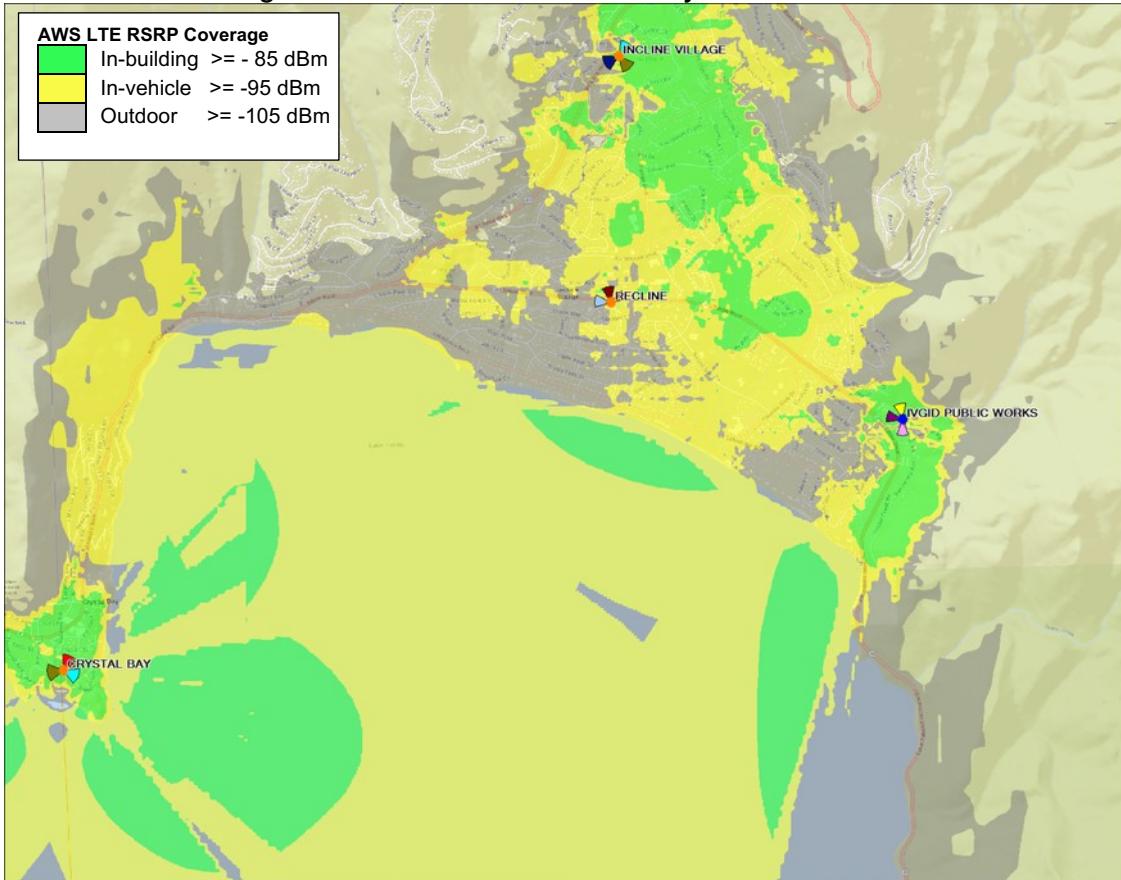
Elevation: 6,380 Feet

In addition to the water tank reviewed as Alternative 3, Verizon Wireless considered placement of a new tower facility on this 87-acre parcel, first examining a lower-elevation area at the parking lot behind the public works facility, 0.6 miles north of the Proposed Facility and 15 feet lower in elevation. Verizon Wireless engineers determined that a 93.75-foot stealth facility in this area cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.

*AWS LTE Coverage at GID Public Works Facility – 84 Foot Antenna Centerline*



## 12. Incline Village GID Treatment Plant

Address: 1250 Sweetwater Road

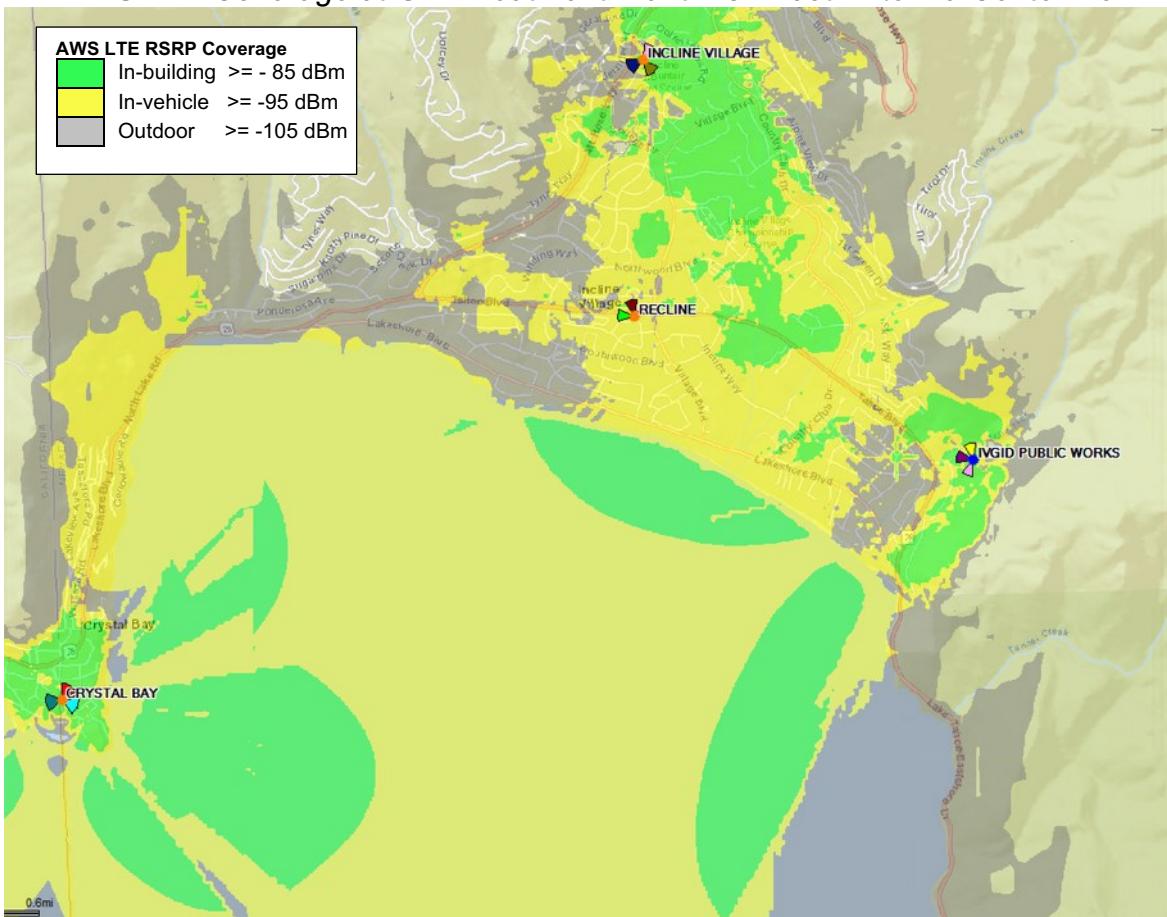
Zoning: PSP (Public and Semi-Public Facilities)

Elevation: 6,490 Feet

Verizon Wireless also considered a new tower facility at a higher-elevation area on the GID property, the parking lot next to the treatment plant, 0.6 miles northeast of the Proposed Facility and 95 feet greater in elevation. Verizon Wireless engineers determined that a 93.75-foot stealth facility near the treatment plant cannot serve the Significant Gap. Because of the high elevation at this location, signal would overshoot the Mill Creek neighborhood, even with antennas adjusted with considerable downtilt. As shown in the following coverage map, a coverage gap would remain in much of the gap area, notably toward the west along Lakeshore Boulevard, including the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



*AWS LTE Coverage at GID Treatment Plant – 84 Foot Antenna Centerline*



### **13. Sierra Pacific Electric Substation**

Address: 0 Sweetwater Road

Zoning: PSP

Elevation: 6,435 Feet

Verizon Wireless reviewed placement of a new tower on this small, secured electric utility property 0.7 miles northeast of the Proposed Facility and 40 feet greater in elevation. A facility at this location would have even less coverage than neighboring Alternative 12, which is in the same zone, and 55 feet greater in elevation on the hill due southwest of the substation. This is not a feasible alternative to the Proposed Facility.



### ***New Monopoles Requiring Proof of a Gap***

Finding no feasible monopole locations over 1,000 feet from the designated trail in the GC, PSP and TC zones, Verizon Wireless next reviewed options within 1,000 feet of the designated trail. This area is within the white dashed line on the map on Page 11.

Many parcels within the 1,000 foot trail setback are zoned suburban residential, where proof of a gap is required per the Code (LDS, MDS and HDS zones), while other zones do not require proof of a gap (TC, MDR, GR, OS and PR zones). However, any location within the 1,000 foot trail setback requires proof of a gap.

The TC-zoned parcels within 1,000 feet of the designated trail are owned by either Ponderosa Ranch LLC or Tunnel Creek Properties LLC. Neither was interested in leasing those areas to Verizon Wireless, as explained under Alternatives 4, 15 and 16.

Verizon Wireless readily identified the following optimal location for its facility.

#### **14. Proposed Facility**

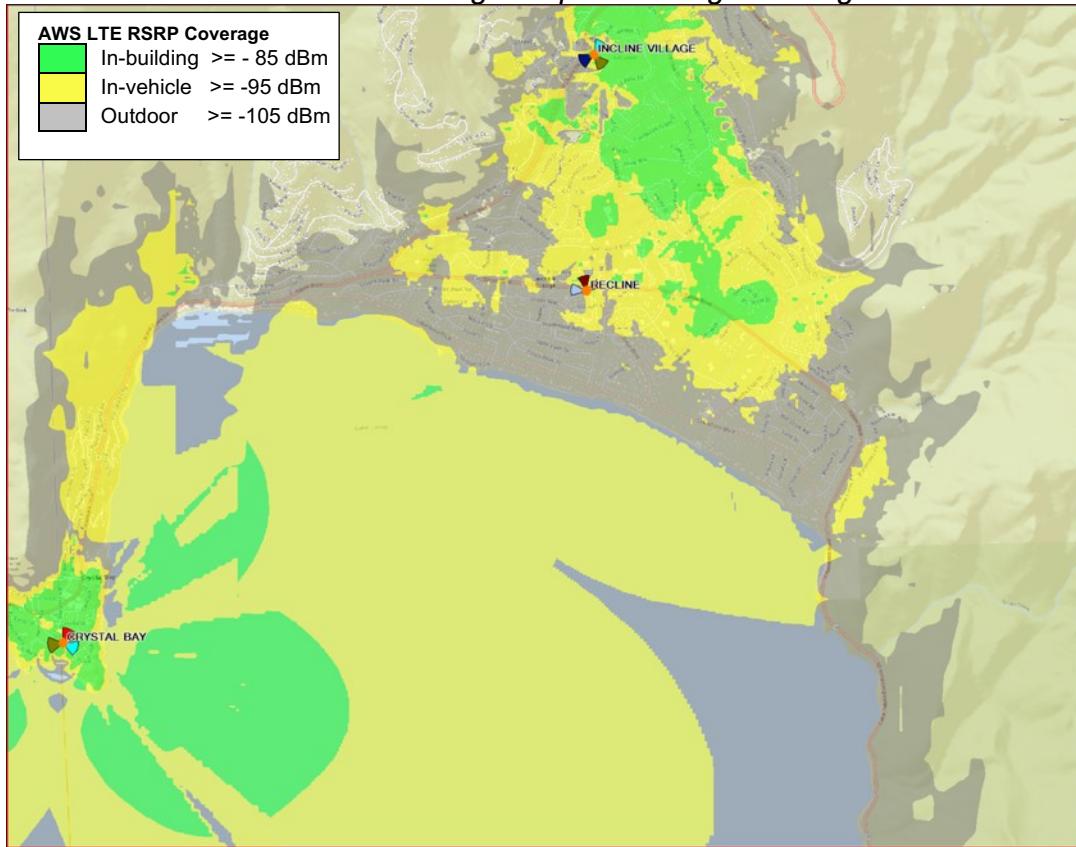
Address: 1200 Tunnel Creek Road  
Zoning: LDS (Low-Density Suburban)  
Elevation: 6,395 Feet



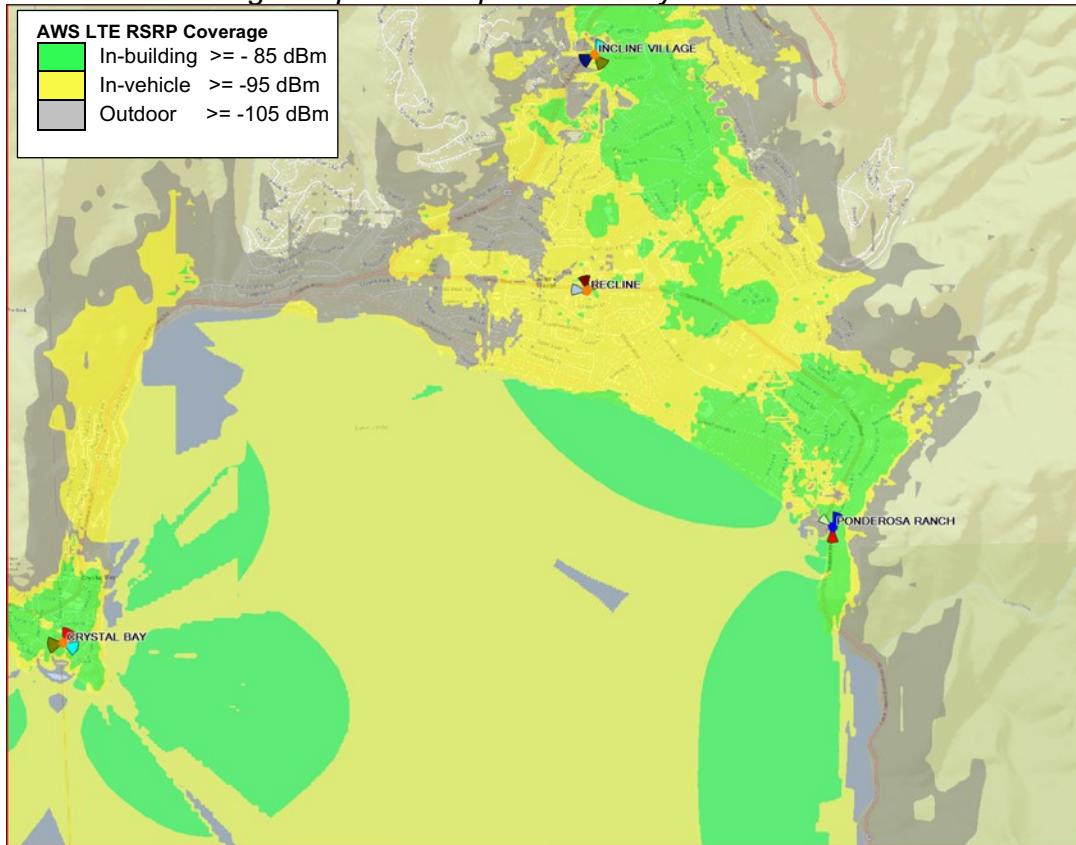
The Proposed Facility has been thoughtfully designed to minimize any impact to the adjacent community. Verizon Wireless proposes to conceal its panel antennas within a 45-foot tower facility camouflaged as a pine tree, placed along a row of established evergreen trees of similar height. Antennas will be concealed within faux foliage and branches, and branches will extend beyond and above the antennas, providing a realistic tapered crown. Antennas will be covered with pine needle socks for further concealment. Due north of the treepole, Verizon Wireless will place an 11' x 15.25' equipment shed designed as a cabin, with wood log siding and a gabled shake roof. The shed will conceal network equipment and a battery cabinet to provide continued service during emergencies.

With antennas placed at a 37-foot centerline at this optimal, elevated location, the Proposed Facility will provide reliable Verizon Wireless LTE service to the Significant Gap. As shown in the following coverage maps, the Proposed Facility will provide new reliable in-building coverage to the Ponderosa Ranch and Mill Creek neighborhoods, the vicinity of Hyatt Regency along Country Club Drive, and along Highway 28 to the south. It also will add new network capacity to relieve the distant network facilities currently providing only weak service to the gap area. An analysis comparing existing and proposed service is found in the RF Engineer's Statement. This is Verizon Wireless's preferred location and design for the Proposed Facility.

AWS LTE Coverage Map – Existing Coverage



AWS LTE Coverage Map with Proposed Facility – 37 Foot Antenna Centerline



## 15. Tunnel Creek Road Property

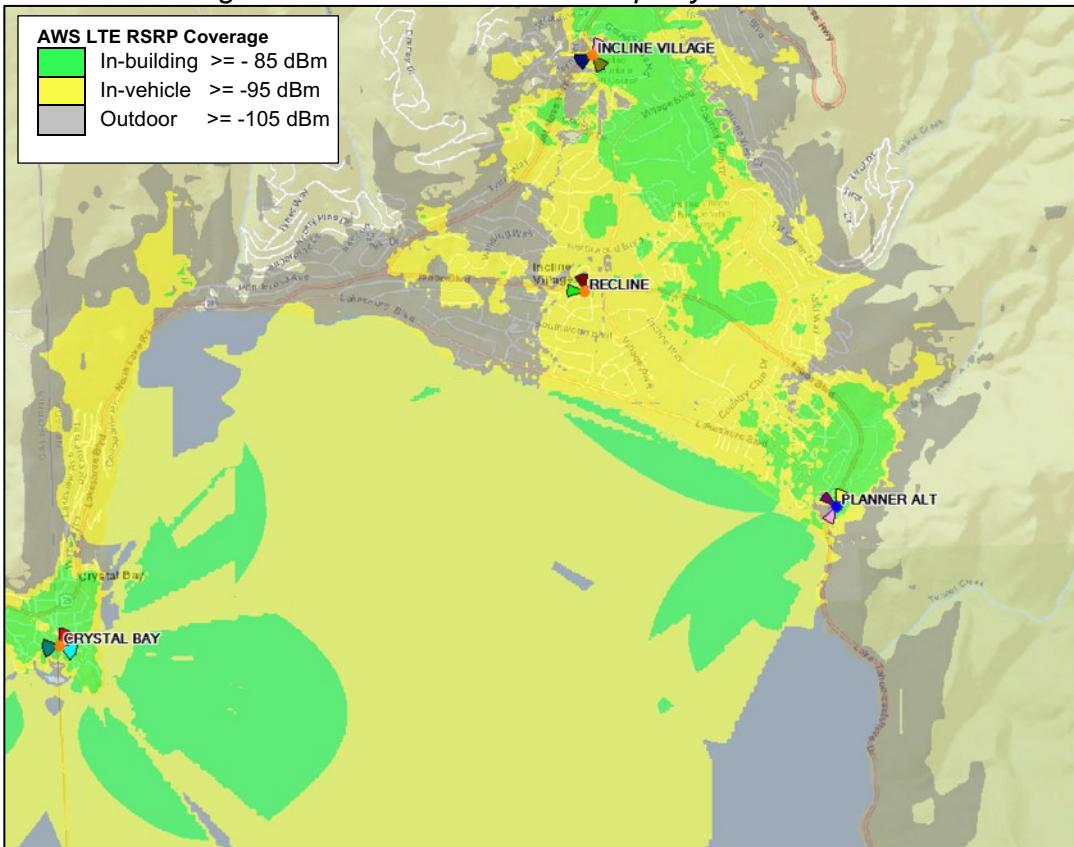
Address: 1200 Tunnel Creek Road  
Zoning: TC (Tourist Commercial)  
Elevation: 6,350 feet

At the request of the County Planning & Building Division, Verizon Wireless reviewed placement of a facility in a vacant area 580 feet north of Proposed Facility on the same property, 45 feet lower in elevation. The property owner declined to lease this portion of the subject parcel, allowing Verizon Wireless to site only at a specific location to the south. This portion of the property is within the TC zone, where applicable height limits could allow a stealth facility 56.25 in height. Verizon Wireless engineers determined

that a 56.25-foot facility cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain the gap area, notably toward the west along Lakeshore Boulevard near Country Club Drive and portions of the Mill Creek neighborhood, with a stretch of Highway 28 south of town lacking in-vehicle service. This is not a feasible alternative to the Proposed Facility.



AWS LTE Coverage at Tunnel Creek Road Property – 48 Foot Antenna Centerline



## **16. Tunnel Creek Café Property**

Address: 1115 Tunnel Creek Road  
Zoning: TC (Tourist Commercial)  
Elevation: 6,310 feet

Verizon Wireless reviewed placement of a facility on this parcel due north of the Proposed Facility property and 85 feet lower in elevation. There are several buildings on this parcel, including the Tunnel Creek Café. The property owner is the same as the Proposed Facility, Tunnel Creek Properties LLC, who declined to lease this parcel, allowing Verizon Wireless to site only at a specific location on its parcel to the south. Lacking a willing landlord, this is not a feasible alternative to the Proposed Facility.



Verizon Wireless sought to avoid siting within the dense, residential subdivisions west of Highway 28, but considered the following vacant parcel at the far east edge of the area, next to the highway.

### **17. Lake Tahoe Trust Property**

Address: 106 Steam Circle

Zoning: MDS (Medium-Density Suburban)

Elevation: 6,295 feet

Verizon Wireless reviewed this small vacant parcel 0.1 miles northwest of the Proposed Facility and 100 feet lower in elevation. A facility at this location of similar height to the Proposed Facility could approach a comparable amount of coverage. However, it would pose more visual impact, due to placement between homes on both neighboring parcels at the same elevation. A tower would be within at least 140 feet of one or both neighboring homes, and there are few trees on the property itself to provide screening. In contrast, the Proposed Facility is located away from offsite buildings. This cannot be considered a less intrusive alternative to the Proposed Facility.



## 18. Tunnel Creek Road MDR Zone

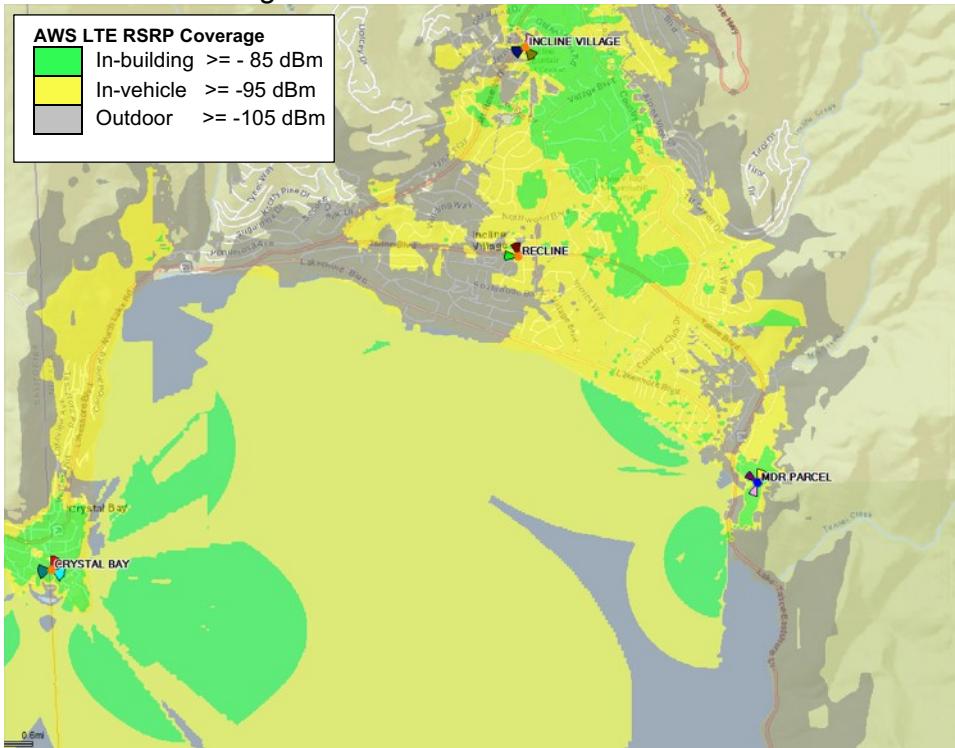
Address: 1500-1600 Tunnel Creek Road  
Zoning: MDR (Medium-Density Rural)  
Elevation: 6,400-6,550 feet

Verizon Wireless reviewed two parcels east of the Proposed Facility uphill, each with a portion zoned MDR. Though monopoles in the MDR zone do not require proof of a gap, that proof is still required at this location within 1,000 feet of the designated trail. Verizon Wireless engineers reviewed graded areas along existing access roads, and determined that a facility the same height as the Proposed Facility cannot serve the Significant Gap, even at an elevation 140 feet greater. Because of the high elevation, signal would overshoot the Mill Creek neighborhood, even with antennas adjusted with considerable down-tilt. As shown in the following coverage map, a broad coverage gap would remain in the Mill Creek neighborhood and along Highway 28, both in the commercial area and a portion to the south. This is not a feasible alternative to the Proposed Facility.



Further, the owner of 1600 Tunnel Creek Road, David Geddes, cannot be considered a willing landlord. Also representing the owner of 1500 Tunnel Creek Road, Joyce Bock, Mr. Geddes objected to the Proposed Facility alleging “visual pollution,” according to the minutes of the Incline Village Crystal Bay Citizens Advisory Board meeting, May 6, 2019.

*AWS LTE Coverage at MDR Parcels – 37 Foot Antenna Centerline*



## 19. United States Forest Service Property

Address: 0 State Route 28

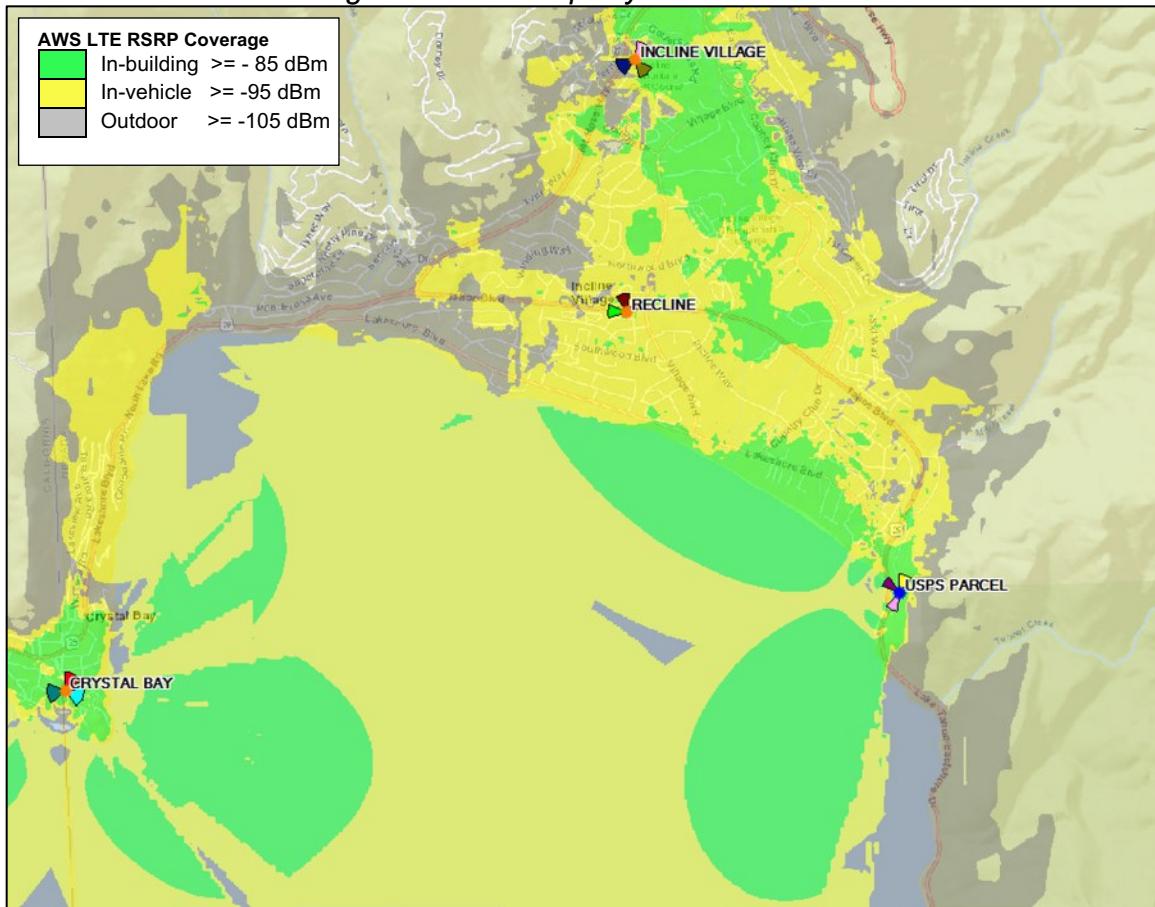
Zoning: OS (Open Space)

Elevation: 6,300-6,650 feet

Verizon Wireless reviewed this large steeply-sloped parcel east of Highway 28, 0.1 miles south of the Proposed Facility with a varying elevation. This is one of two large parcels due south of the developed area of Incline Village. Construction of a tower foundation and wireless equipment area would require extensive grading and pose substantial environmental and visual impact, and may pose insurmountable engineering challenges. Further, Verizon Wireless engineers determined that a 56-foot facility at this location cannot serve the Significant Gap. As shown in the following coverage map, a coverage gap would remain in much of the Mill Creek area, and in the Ponderosa Ranch and commercial areas along Highway 28 north of Lakeshore Boulevard. This is neither a feasible nor less intrusive alternative to the Proposed Facility.



*AWS LTE Coverage at USFS Property – 48 Foot Antenna Centerline*



## **20. Lake Tahoe Nevada State Park**

Address: State Route 28

Zoning: PR (Parks and Recreation)

Elevation: 6,550-6,890 feet

Verizon Wireless reviewed placement of a facility on the northwest corner of this very large state park, on the other large parcel due south of the developed area of Incline Village. There is no development in this backcountry area of the park.

Construction of a tower foundation, wireless equipment area, and access road would require extensive grading and pose substantial environmental and visual impact, and may pose insurmountable engineering challenges. This cannot be considered a less intrusive alternative to the Proposed Facility.



## **V. Conclusion**

Verizon Wireless has reviewed existing structures and 20 specific alternative locations to fill the Significant Gap in service in the southeast Incline Village area. Based upon the values expressed in the Washoe County Development Code, the Proposed Facility clearly constitutes the least intrusive feasible location for Verizon Wireless's facility.

**verizon**

Ponderosa Ranch  
Incline Village, Washoe County  
Alternative Site Locations



5



## Existing

Photosimulation of the view south from the trailhead on Tunnel Crk Rd.



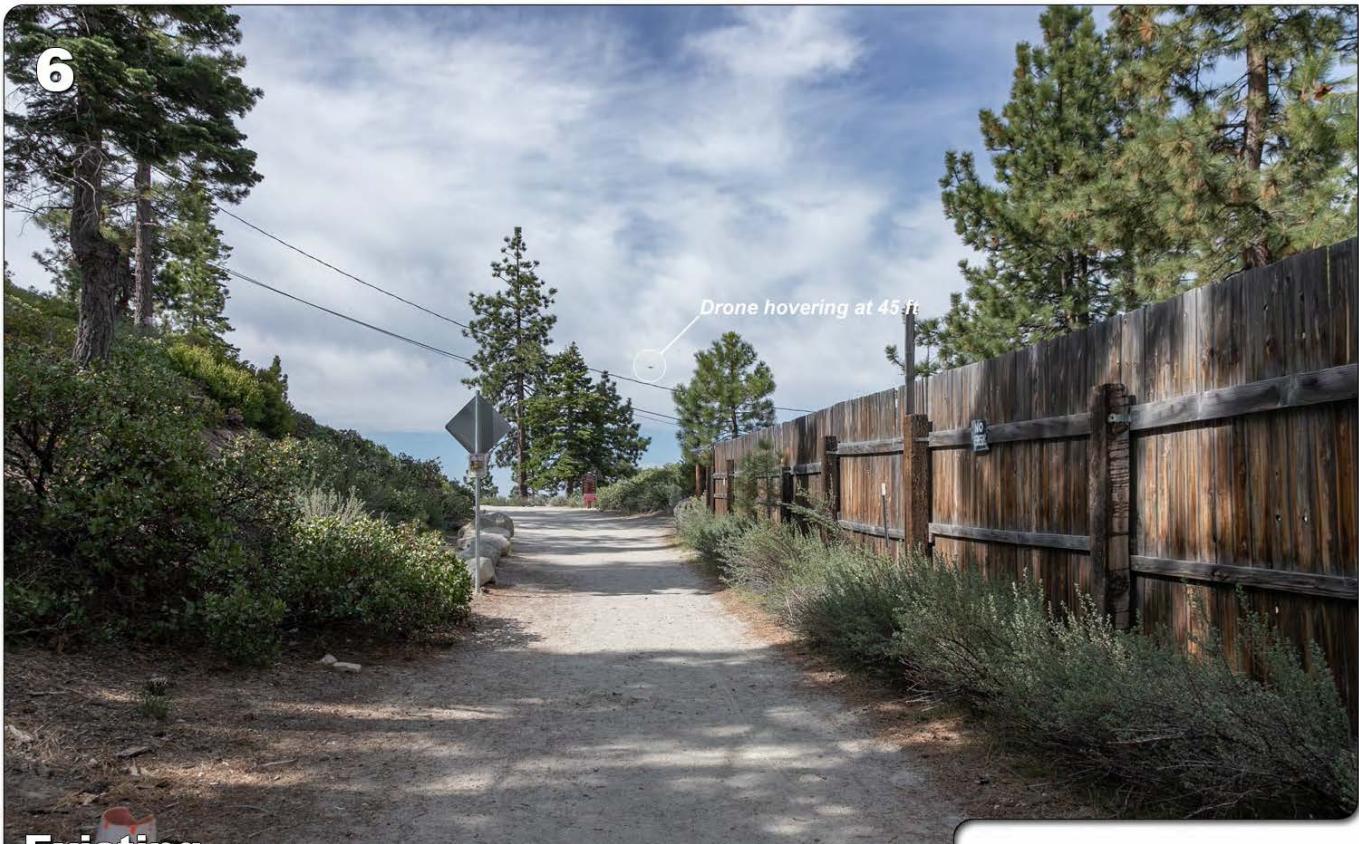
## Proposed

**Ponderosa Ranch**

1200 Tunnel Creek Road  
Incline Village, NV 89451

**verizon**✓

6



**Existing**

Photosimulation of the view looking south along Tunnel Creek Trail.

**Ponderosa Ranch**

1200 Tunnel Creek Road  
Incline Village, NV 89451

**verizon<sup>✓</sup>**



**Proposed**

© Copyright 2020 Previsualists Inc. • www.photosim.com • Any modification is strictly prohibited. Printing letter size or larger is permissible.  
This photosimulation is based upon information provided by the project applicant.