



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

December 3, 2012

TO: Patricia Hachiya, AICP, Hearing Officer

FROM: Anthony Curzi *AC*  
Regional Planning Assistant II  
Zoning Permits North Section

SUBJECT: **Project No. R2012-00688-(5)**  
**Conditional Use Permit No. 201200050**  
**Hearing Officer Meeting: December 4, 2012**  
**Agenda Item 3**

Enclosed please find the complete letter from the applicant regarding the above-referenced project. The last submittal to you included this letter but was missing page 4. That page has been included in this transmittal.



November 20, 2012

Los Angeles County  
Department of Regional Planning  
Patricia Hachiya, AICP, Hearing Officer  
320 W. Temple Street Los Angeles, CA 90012

Re: **Project No. R2012-00688-(5); Conditional Use Permit (Renewal) 201200050\_A  
Conditional Use Permit (CUP) for the collocation, continued operation, and  
maintenance of an existing wireless telecommunications facility (WTF) in the R-R  
(Resort and Recreation) zone – Proposed Design Enhancements**

Dear Madam Hearing Officer Patricia Hachiya;

Pursuant to our recent Public Hearing on November 6, 2012 (Agenda Item 4.) conducted in consideration of our application for the continued operation and maintenance, with the addition of Metro PCS wireless facilities, of our existing wireless telecommunications facility designed as a monopole (105'), we are providing the following information as requested:

1. Coverage maps for existing and proposed wireless communications companies seeking to maintain or expand critical wireless communication services to this largely recreational, open space and transportation corridor.
  - a. SprintPCS, Crown's tenant located at the top of the monopole, has provided their coverage maps (attached) for this facility that clearly justify the height of the existing monopole at 105'.
  - b. Metro PCS which is the Crown's tenant located at the lowest position on the monopole, has also provided coverage maps that demonstrate their needs in providing service in this area.
2. A copy of the original entitlement, Conditional Use Permit Case No. 99-242-(5), and associated "Environmental Documentation" that concluded/determined no significant impacts to the environment would result from the subject "project" and therefore a "Negative Declaration" was issued by the Department of Regional Planning on March 28, 2001, and subsequently confirmed by the decision making authority.
  - a. **The original entitlement, Conditional Use Permit Case No. 99-242-(5), along with the associated "Negative Declaration" was unanimously approved 4-0-0-0 on January 9, 2002, by the Los Angeles County Regional Planning Commission.**
  - b. **Also attached is the most recent "Revised Exhibit A (REA 2009 00147)" issued by Los Angeles County for this site dated October 29, 2009.**
    - i. **This is important to add to the record as it demonstrates that even as recent as three (3) years ago, Los Angeles County determined that this facility was consistent with applicable policies.**



3. Proposed design alternatives/enhancements of the existing facilities.
  - a. Attached to this correspondence are photographic simulations that illustrate the preferred design enhancements that Crown Castle (tower owner) is presenting for your consideration, consisting of:
    - i. Installing automatic timer switches on all manually operated lighting switches to prevent lights being left on when not in use by maintenance personnel;
    - ii. Painting the existing monopole and all existing and proposed antenna a desert/sand (matte finish) to better match the predominant color of the surrounding landscape/environment; and
    - iii. Installation of a 6 foot high wood fence surrounding the equipment compound (brown in color) to screen all existing and proposed ground equipment.

We would also like to take this opportunity to again reference our letter dated, November 5, 2012 (attached), which serves as our response to the concerns raised by the "Three Points-Liebre Mountain Town Council" dated October 31, 2012, and provide a brief summary of our understanding of the policies raised by the Town Council. We would also like to take this opportunity to formally respond to the comments raised in objection to our application by Mr. Lloyd, a property owner in proximity to this existing site.

Concerning the Town Councils representation of the visual resource policies applicable to the subject property we provide the following:

- Lancaster Road (Hwy 138) and Ridge Route Road are not designated by either the State of California or Los Angeles County General Plan as "Adopted or Eligible Scenic Highways".
  - The Antelope Valley Areawide General Plan did designate Lancaster Road (Hwy 138) and Ridge Route Road as "Proposed Scenic Highway Corridors" in 1986.
    - It is important to note that Interstate 5 is afforded the same designation. The predominate design of wireless telecommunications along Interstate 5 and the roadways adjacent to our existing facility has always been monopole type designs.
    - This "proposed" roadway designation was also in place when the subject facility was originally approved by the Planning Commission on January 9, 2002. Alternative "stealth" designs were fairly common in 2002 and there is no mention of any alternatives being considered or appropriate for this location. As noted at the hearing and recognized by the Town Council replacement of this 105 foot structure with a fake tree is not a viable solution; whereas the stealth measure we propose will reduce visibility and improve aesthetics.
    - The Antelope Valley Areawide General Plan is also clear in its policies concerning the treatment of these "Proposed" Scenic Highway Corridors

in that it states that future studies are necessary to determine applicable design standards that should be developed for each roadway with this designation. No such specific studies or standards have been developed or adopted at this time.

- The Antelope Valley Areawide General Plan in Chapter V Policy Statements, Policy 93, entitled “Scenic Highways” reads as follows:
  - “93. Implement the Counties Scenic Highways Element (as amended) in stages as funds become available.”
  - The Scenic Highways Element (1974) has no specific policies on development standards applicable to the type of project that is the subject of this application and specifically identifies the adjacent roadways as “Second Priority Routes – Proposed for Further Study”.
  - “The Regional Recreation Areas Plan (1965)” designates Lancaster Road (Hwy 138) and Ridge Route Road as “Proposed Scenic Drives”. The designation as “proposed” is relevant in the application of the policies contained within this nearly 50 year old document.
- In addition, to the above policy analysis, we do recognize the policies from the General Plan Land Use Element, that were added into the record at the time of the hearing on November 6, 2012, by the project planner, Mr. Curzi, and concur with Mr. Curzi’s determination that the facilities as they exist are consistent with the applicable design criteria.

Concerning Mr. Lloyd’s objections, we provide the following:

- Screen all existing and proposed ground equipment from his view with the installation of a 6 foot wood fence surrounding the equipment compound (brown in color).
- Install timers on the work lights to address Mr. Lloyd’s complaint that work lights have been left on.
- Paint the tower and antennas a color, sandy brown (matte finish), that will blend in with the dominant color of the landscape that serves as the backdrop to the facility as seen from Mr. Lloyd’s property as well as from other surrounding properties.
- Neither Lancaster Road (Hwy 138) nor Ridge Route Road are designated/adopted by the state of California as a “Historical Parkway” as Mr. Lloyd contends. See attached “California Scenic Highway Mapping System” exhibit.
- We have also confirmed with the Planning Department and Crown Castle’s database of complaints that no complaints were made by Mr. Lloyd concerning this facility until this application was submitted and noticed.

There are three (3) additional factors that we wish to convey in support of the proposed enhancements:

1. The technical requirements of the subject colocation wireless communications facility, as confirmed by the carriers, necessitate its current height.



- a. As a result, this single facility provides coverage for multiple wireless providers thereby significantly reducing the need for any additional facilities in this area;
2. The physical environment in this area can be extremely harsh, particularly with respect to heat and wind velocity.
  - a. Any other design alternative, at a height of 105', would require a significant increase in mass in order to be structurally able to withstand wind loads and result in a larger facility that would increase impacts on views and visual resources.
3. An alternative faux structure at a height of 105' would create a landmark feature, which in and of itself would not be consistent with the required findings added into the record concerning scenic highways.

In closing we wish to summarize all the competing elements of this land use with the applicable policies:

- The facility is collocatable thereby reducing the need for any additional wireless communications facility in the area and providing lifesaving communications in the event of natural or other disasters in the area.
- The design is consistent with the hundreds of existing utility poles that are the predominate development feature along this corridor.
- The design is consistent with numerous other communications towers recently approved for additional 10 to 15 year terms, without "stealthing", by the County of Los Angeles along similarly designated roadways.
- It is a slim design only visible for approximately ½ mile along the adjacent roadways, which we believe, as does planning staff, is consistent with the spirit and intent of the applicable scenic highway policies added to the record on November 6, 2012.
- This facility was comprehensively reviewed approximately 10 years ago against all these same policies and the existing design was determined not to have a significant impact on "visual resources" and a Negative Declaration was unanimously adopted by the Planning Commission. It was again reviewed only three (3) years ago as part of a minor modification process (REA 2009 00147 attached) and again it was found to be consistent and compliant with all applicable policies.
- Any other design would become a significant visual impact and largely inconsistent with the predominately natural landscapes that are comprised primarily of ground cover and large bushes which make up the surrounding environment.
- The majority of all existing wireless telecommunications along this travel corridor (Hwy 138) and Interstate 5 (which has the same "Proposed Scenic Highway Corridor" designation) are predominately designed as monopoles.

We look forward to our upcoming hearing and working with your office to ensure this existing wireless telecommunication facility can continue to provide critical wireless



telecommunications services in support of the surrounding areas and respectfully request approval of our application.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Scully'.

Sean Scully  
Principal, PPTi (Authorized agent for Crown Castle and Property Owner)  
T: (818) 426-6028  
E-mail: [permittech@verizon.net](mailto:permittech@verizon.net)

Cc: Jon Dohm, Crown Castle  
Joseph Parker, Esq., Shustak Frost and Partners

Attachments:

Coverage Maps: Sprint (top position); and Metro PCS (bottom position).  
Conditional Use Permit Case No. 99-242-(5) with associated ISND.  
Revised Exhibit A (REA 2009 00147).  
Response to Town Council Comments, dated November 5, 2012.  
California Scenic Highway Mapping System Exhibit.  
Photographic Simulations with Proposed Design Enhancements (3 sets of 11" x 17").  
Revised Plan Sets that includes Proposed Design Enhancements (3 sets of 11" x 17").