



Los Angeles County  
Department of Regional Planning

*Planning for the Challenges Ahead*



Richard J. Bruckner  
Director

February 5, 2015

TO: Laura Shell, Chair  
Pat Modugno, Vice Chair  
Esther L. Valadez, Commissioner  
David W. Louie, Commissioner  
Curt Pedersen, Commissioner

FROM: Michele Bush   
Zoning Permits East Section

SUBJECT: **Project No. R2014-00792-(1)**  
**Conditional Use Permit No. 201400033**  
**RPC Meeting: February 18, 2015**  
**Agenda Item: No. 5**

The above-mentioned item is a request to authorize the construction and maintenance of a 35-foot high unmanned monopine wireless telecommunications facility. Attached is a full color copy of the site analysis packet previously submitted by the applicant. Also attached is a list of alternative sites and monopines in the surrounding community, full color copies of site propagation maps, and two additional letters of opposition, one from an area resident and another from the Workman Mill Association. The Concerned Residents of Avocado Heights also forwarded the attached response to the additional information and maps that were posted on the Department of Regional Planning website. Also included are revised Findings and Conditions of Approval for the subject project.

In light of opposition to the project, the applicant is investing alternative locations on the project site for the relocation of the wireless telecommunications facility. If an alternative location is feasible, revised plans will be forthcoming.

If you need further information, please contact Michele Bush at (213) 974-6435 or [mbush@planning.lacounty.gov](mailto:mbush@planning.lacounty.gov). Department office hours are Monday through Thursday from 7:00 a.m. to 6:00 p.m. The Department is closed on Fridays.

MM:mrb

Enclosure

**DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION  
AND ORDER  
COUNTY OF LOS ANGELES  
PROJECT NO. R2014-00792-(1)  
CONDITIONAL USE PERMIT NO. 201400033**

1. The Los Angeles County ("County") Regional Planning Commission ("Commission") conducted a duly-noticed public hearing in the matter of Conditional Use Permit No. 201400033 ("CUP") on January 14, 2015.
2. The permittee, Verizon Wireless ("permittee"), requests the Project Permits to authorize the construction and maintenance of an unmanned 35-foot high monopine wireless telecommunications facility ("Project") on a property located at 510 Workman Mill Road in the unincorporated community of Avocado Heights ("Project Site") in the C-1 (Restricted Business) zone pursuant to Los Angeles County Code ("County Code") section 22.28.110.
3. The Project Site is 7.14 gross acres in size and consists of three legal lots. The Project Site is rectangular in shape with relatively flat topography and is developed with an existing shopping center.
4. The Project Site is located in the Puente Zoned District and is currently zoned C-1 (Restricted Business) within the Avocado Heights Community Standards District.
5. The Project Site is located within the 1-Low Density Residential (1 to 6 du/ac) land use category of the Countywide Land Use Policy Map.
6. Surrounding Zoning within a 500-foot radius includes:
  - North: A-1-6,000 (Light Agricultural-6,000 sf minimum lot area)
  - South: RPD-7,200-10U (Residential Planned Development)
  - East: R-1-7,200 (Single-Family Residence)
  - West: A-1-1,600
7. Surrounding land uses within a 500-foot radius include:
  - North: Single-Family Residential
  - South: Condominium Units
  - East: Single-Family Residential
  - West: Single and Multi-Family Residential
8. The subject property has existed as a commercial center for more than 30 years. A similar request for a wireless telecommunications facility, in approximately the same location under a different carrier, was approved by the Hearing Officer on January 16, 2007. The facility was never constructed and the permit expired.
9. The site plan for the Project depicts the project site developed with a shopping center, consisting of three one-story buildings. The lease area for the proposed

wireless telecommunications facility is shown adjacent to the southeast corner of one of the existing commercial buildings, toward the southeast property boundary. The wireless telecommunications facility consists of a 35-foot high monopine to include 12 panel antennas, six (6) Radio Remote Units, two (2) Raycaps and two (2) microwave dishes. Three (3) equipment cabinets, two (2) battery cabinets, four (4) Global Positioning System antennas and one (1) standby generator will be located inside a proposed 15' x 30' (450sf) CMU block wall enclosed lease area.

10. The Project Site is accessible via Workman Mill Road and Don Julian Road to the north and west.
11. One parking space is necessary for site visits done on a monthly basis by maintenance personnel. The project site provides parking to meet this requirement.
12. On August 6, 2014, prior to the initial Hearing Officer's public hearing on the Project, the permittee met with the Workman Mill Association to present the proposed project. The Workman Mill Association did not make a recommendation regarding the project.
13. Prior to the Commission's public hearing on the Project, Regional Planning staff determined that the Project qualified for a Class 3, New Construction or Conversion of Small Structures, categorical exemption from the California Environmental Quality Act (Public Resources Code section 21000, et seq.) ("CEQA"), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County because the Project involved the installation of a new wireless telecommunications facility.
14. Pursuant to the provisions of sections 22.60.174 and 22.60.175 of the Zoning Code, the community was appropriately notified of the Project's public hearings by mail, newspaper, property posting, library posting and DRP website posting.
15. Prior to the Commission's public hearing, the Department of Regional Planning ("Regional Planning") staff received two phone calls from area residents, one with general questions regarding the proposed project and the other expressing opposition to the project proposal. One letter in opposition, with a petition including 44 signatures, was received from Concerned Residents of Avocado Heights, an additional petition with 186 additional signatures was submitted. Another letter in opposition was received from the Clean Air Coalition of North Whittier and Avocado Heights. Also received were an email from an area resident in support of the project and a letter from an area resident in opposition to the project.
16. A duly noticed public hearing was held on September 16, 2014 before Hearing Officer Alex Garcia. The applicant's representative, Elaine Yang, was present to answer questions regarding the project. The Hearing Officer also heard testimony from members of the public. Three members of the community spoke in opposition to the proposed project, expressing concerns with the location of the project, alternative sites and the visual intrusion it would cause on surrounding residences. The Hearing Officer expressed concern regarding the visual impacts to the

residences adjacent to the project site. The Hearing Officer recommended the applicant research ways to screen the equipment lease area from those properties and continued the public hearing to October 21, 2014.

The continued public hearing was held on October 21, 2014 before Hearing Officer Alex Garcia. The applicant's representative and two members of the community made presentations regarding the proposed project. The Hearing Officer expressed continued concern regarding the visual impacts to the residences adjacent to the project site and thorough examination of alternative sites. Seeing these items had not been adequately addressed, the Hearing Officer referred the case to the Commission.

In response to previous concerns regarding the proposed project, the applicant prepared an Alternative Site Analysis which includes a Project v. Bees Analysis, FCC Compliance Letter, Property Value Literature, Revised Photo Sims and Existing Verizon Monopine Samples.

A duly noticed public hearing was held on January 14, 2015 before the Regional Planning Commission. The applicant's representatives, Elaine Yang and John Koos, were present to answer questions regarding the project. The Commission also heard testimony from members of the public. Four members of the community spoke in opposition to the proposed project, expressing concerns with the location of the project, alternative sites and the visual intrusion it would cause on surrounding residences.

Commissioner Pedersen asked questions regarding the height of trees in the surrounding area and required landscaping for the existing shopping center. Commissioner Valadez stated additional time was needed to visit the project site and alternative sites listed in the applicant's Alternative Site Analysis. Commissioner Valadez also requested staff research Verizon sites in the area surrounding the project site and provide them for review. Commissioner Valadez moved that the public hearing be continued to February 18, 2015.

17. The Commission finds that the Project is consistent with the goals and policies of the Countywide Land Use Plan. The subject property is located within the 1-Low Density Residential (1 to 6 du/ac) land use designation. Within the generalized residential areas mapped, a variety of use types and intensities presently exist. Such uses typically include local commercial and industrial services, schools, churches, local parks and other community-serving public facilities. It is not the intent of the General Plan policy to preclude further development or expansion of such uses within areas depicted as residential on the Land Use Policy Map.
18. The Commission finds that the Project is consistent with the Zoning Code. A wireless telecommunications facility is a use not specified in the Zoning Ordinance. The closest described uses are radio and television towers. Pursuant to Section 22.28.110 of Title 22 of the Los Angeles County Code, these are permissible uses in the C-1 (Restricted Business) zone, provided a Conditional Use Permit has first been obtained.

19. Verizon wireless facilities are regulated by the FCC. The disguised nature of the facility as a pine tree and its location towards the rear of the shopping center allow the center to be used just as it is currently. It will not affect vehicular circulation within the customer parking lot. No discernible noises, smells, light, glare or traffic will be produced by the proposed facility. The equipment will be fully secured by an enclosure and will provide needed voice, data and 911 services to the area. Allowing the wireless telecommunications facility to be built and operate will ensure that local cellular service will remain readily available in the vicinity. The concern raised regarding the potential health effects for residents, from radio frequency emissions from the facility antennas, is not an issue that can be used for case determination. Section 704 of Title 7 of the Federal Telecommunications Act of 1996 contains the following stipulation:

“IV. No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emission.”

The closest residence to the proposed facility is at a distance of approximately 100 feet. As a condition of approval for this case, the applicant will have to comply with emission standards of the Public Utilities Commission of the State of California (CPUC). Accordingly, the Commission finds that the Project will not adversely affect the health, peace, comfort, or welfare of persons residing and working in the surrounding area, and will not be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the Project Site, and will not jeopardize, endanger, or otherwise constitute a menace to the public health, safety, and general welfare.

20. The project site is adequate in size and shape to accommodate all the development features prescribed in Title 22. The proposed facility will not impact any required yards, setbacks, parking or loading facilities, fencing or landscaping. The location on the property is unobtrusive and the monopine design should blend in with trees in the surrounding area and along the southwest boundary of the project site. Accordingly, the Commission finds that the Project site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.

21. The proposed facility will be unmanned. It will only be visited occasionally (about once a month) for maintenance purposes. The existing highways, streets and driveways will adequately provide access to the facility. The facility will be properly connected to all utilities such as power, telco and fiber. Accordingly, the Commission finds that the proposed site is adequately served by highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public private service facilities as are required.

22. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the conditional use permit to 20 years.
23. The Commission finds that pursuant to sections 22.60.174 and 22.60.175 of the County Code, the community was properly notified of the public hearing by mail, newspaper, and property posting. Additionally, the Project was noticed and case materials were available on Regional Planning's website and at the Sunkist Library located in the vicinity of the Avocado Heights community. On November 26, 2014, a total of 245 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 500-foot radius from the Project Site, as well as eleven (11) notices to those on the courtesy mailing list for the Puente Zoned District and to any additional interested parties.
24. The location of the documents and other materials constituting the record of proceedings upon which the Commission's decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Zoning Permits East Section, Department of Regional Planning.

**BASED ON THE FOREGOING, THE COMMISSION CONCLUDES THAT:**

- A. The proposed use with the attached conditions will be consistent with the adopted General Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

**THEREFORE, THE REGIONAL PLANNING COMMISSION:**

1. Finds that the Project is exempt from the California Environmental Quality Act pursuant to section 15303 of the State CEQA Guidelines (Class 3, New Construction or Conversion of Small Structures categorical exemption); and

2. Approves Conditional Use Permit 201400033, subject to the attached conditions.

**ACTION DATE: February 18, 2015**

MM:mrb  
02/18/15

c: Each Commissioner, Zoning Enforcement, Building and Safety

**DRAFT CONDITIONS OF APPROVAL  
COUNTY OF LOS ANGELES  
PROJECT NO. R2014-00792-(1)  
CONDITIONAL USE PERMIT NO. 201400033**

**PROJECT DESCRIPTION**

This permit authorizes the construction and maintenance of an unmanned 35-foot high monopine wireless telecommunications facility and appurtenant equipment, subject to the following conditions of approval:

**GENERAL CONDITIONS**

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant, owner of the property, and any other person, corporation, or other entity making use of this grant.
2. This grant shall not be effective for any purpose until the permittee, and the owner of the subject property if other than the permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning ("Regional Planning") their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 7, and until all required monies have been paid pursuant to Condition No. 10. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 4, 5, and 9 shall be effective immediately upon the date of final approval of this grant by the County.
3. Unless otherwise apparent from the context, the term "date of final approval" shall mean the date the County's action becomes effective pursuant to Section 22.60.260 of the County Code.
4. The permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code Section 65009 or any other applicable limitations period. The County shall promptly notify the permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. In the event that any claim, action, or proceeding as described above is filed against the County, the permittee shall within ten days of the filing make an initial deposit with Regional Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to permittee or permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the permittee according to County Code Section 2.170.010.

6. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.
7. Prior to the use of this grant, the permittee, or the owner of the subject property if other than the permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk ("Recorder"). In addition, upon any transfer or lease of the property during the term of this grant, the permittee, or the owner of the subject property if other than the permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
8. **This grant shall terminate on February 18, 2035.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If the permittee intends to continue operations after such date, whether or not the permittee proposes any modifications to the use at that time, the permittee shall file a new Conditional Use Permit application with Regional Planning, or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least six (6) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that the permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.
9. This grant shall expire unless used by March 6, 2017. A single one-year time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date.
10. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the permittee to cease any development or activity not in full compliance shall be a violation of these conditions. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The permittee shall deposit with the County the sum of **\$2,200.00**. The deposit shall be placed in a performance fund, which shall be used exclusively to compensate

Regional Planning for all expenses incurred while inspecting the premises to determine the permittee's compliance with the conditions of approval. The fund provides for eleven (11) biennial inspections. Inspections shall be unannounced.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the permittee shall be financially responsible and shall reimburse Regional Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount charged for additional inspections shall be \$200.00 per inspection, or the current recovery cost at the time any additional inspections are required, whichever is greater.

11. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") may, after conducting a public hearing, revoke or modify this grant, if the Commission finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to Chapter 22.56, Part 13 of the County Code.
12. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of said department.
13. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works to the satisfaction of said department.
14. All development pursuant to this grant shall adhere to the requirements contained in Title 12 12.08 of the Los Angeles County Noise Control Ordinance.
15. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a Revised Exhibit "A" approved by the Director of Regional Planning ("Director").
16. The permittee shall maintain the subject property in a neat and orderly fashion. The permittee shall maintain free of litter all areas of the premises over which the permittee has control.
17. All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by Regional Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the permittee shall remove or cover said markings, drawings, or signage within 24 hours of notification of such occurrence, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

18. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **three (3) copies** of a modified Exhibit "A" shall be submitted to Regional Planning by **March 18, 2015**.
19. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the permittee shall submit **three (3) copies** of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A". All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

#### PERMIT SPECIFIC CONDITIONS

20. The facility shall be operated in accordance with regulations of the State Public Utilities Commission.
21. Upon completion of construction of the facility, the permittee shall provide upon request to the Zoning Enforcement Section of Regional Planning written certification that the radio frequency electromagnetic emissions levels comply with adopted Federal Communications Commission (FCC) limitations for general population/uncontrolled exposure to such emissions when operating at full strength and capacity. If other WTFs are located on the subject property or on adjacent parcels, the aforementioned report shall include the radio frequency electromagnetic emissions of said WTFs.
22. Insofar as is feasible, the permittee shall cooperate with any subsequent applicants for wireless communications facilities in the vicinity with regard to possible co-location. Such subsequent applicants will be subject to the regulations in effect at that time.
23. Any proposed WTF that will be co-locating on the proposed facility will be required to provide upon request the same written verification of emissions and include the cumulative radiation and emissions of all such facilities to the Zoning Enforcement Section of Regional Planning.
24. All structures shall conform to the requirements of the Division of Building and Safety of Public Works or other appropriate agency and obtain an encroachment permit if deemed necessary.
25. External lighting, including security lighting, shall be on motion sensors, be of low intensity, fully shielded and directed away from any adjacent residences. Pole

mounted lighting is prohibited on the leasehold unless the facility is disguised as a light pole. Antenna lighting is prohibited. Beacon lights are prohibited unless required by the FAA.

26. Construction and maintenance of the facility shall be limited to the hours of 9:00 AM to 5:00 PM, Monday through Friday. Emergency repairs of the facility may occur at any time.
27. Placement and height of all pole mounted equipment shall be in substantial conformance with that shown on said Exhibit "A". The facility shall be built as depicted in the photo simulations presented at the public hearing.
28. One parking space for maintenance vehicles shall be provided. The space does not have to be dedicated solely to maintenance vehicles. Maintenance vehicles shall not block access to driveways or garages.
29. The maximum height of the facility shall not exceed 35 feet above finished grade.
30. The permittee shall maintain current contact information with the Zoning Enforcement Section of Regional Planning.
31. The finished surface of the facility shall not be glossy or reflective in nature unless such finish is necessary to blend into existing design features. The finish shall be graffiti-resistant.
32. The facility shall be maintained in good condition and repair, and shall remain free of: general dirt and grease; chipped, faded, peeling or cracked paint; trash, debris, litter, graffiti and other forms of vandalism; cracks, dents, blemishes and discolorations; visible rust or corrosion on any unpainted metal areas. Any damage from any cause shall be repaired by the permittee within 30 days of notice. Weathered, faded or missing parts/materials used to disguise/camouflage the facility shall be maintained and/or replaced by the permittee within 30 days of notice. Provided landscaping shall be maintained at all times and shall be promptly replaced if needed.
33. Upon request, the permittee shall submit annual reports to the Zoning Enforcement Section of Regional Planning to show compliance with the maintenance and removal conditions.
34. The project number, conditional use permit number and lease holder contact information shall be prominently displayed on the facility where it can be easily viewed at or near eye level.
35. The facility shall be secured by fencing, gates and/or locks. All fencing or walls used for screening or securing the facility shall be composed of wood, vinyl, stone, concrete, stucco or wrought iron. Chain links, chain link with slats, barbed and other types of wire fencing are prohibited. If the facility's fences or walls are visible

from the public right-of-way, landscaping, in a minimum planter width of five feet, shall be provided to screen the fence or wall from the street.

36. Upon termination of this grant or after the construction of this facility, if the facility has ceased to operate; the permittee shall remove such facility and clear the site of all equipment within six months of the cease of operation date. The permittee shall restore the site as nearly as practicable to the condition prior to the installation of the subject facility.
37. New equipment added to the facility shall not compromise the stealth design of the facility.
38. Antennas shall be painted or covered to match their background (branches or trunk). The antennas shall not extend beyond the monotree branches or fronds. There shall be ample branch coverage to hide the antennas from view as effectively as possible. Faux bark cladding shall be provided from the ground to five feet beyond where the faux branches begin; above the faux bark shall be flat non-reflective brown paint to match the bark.
39. Appurtenant equipment boxes shall be screened or camouflaged.

#### **PROJECT SITE SPECIFIC CONDITIONS**

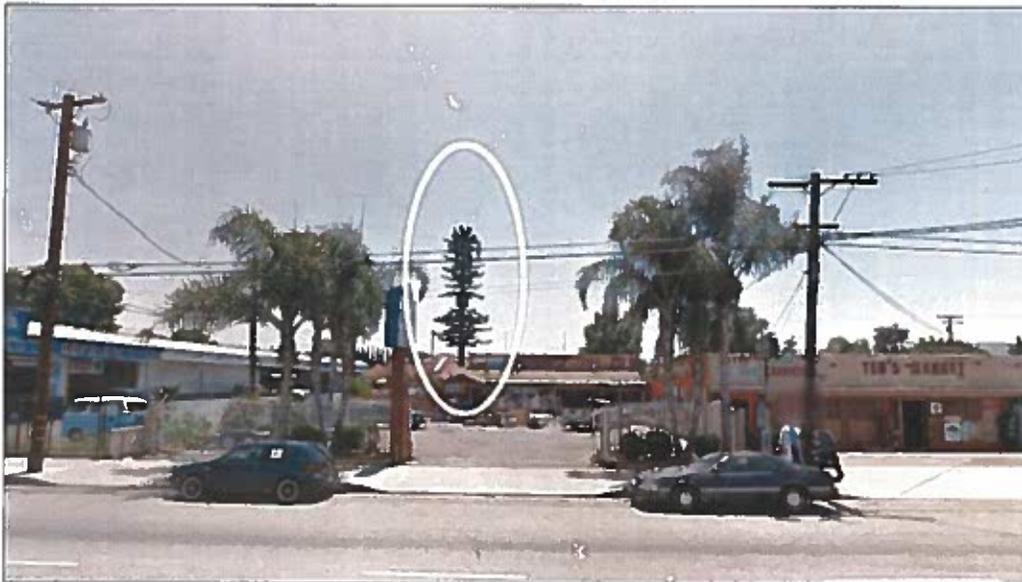
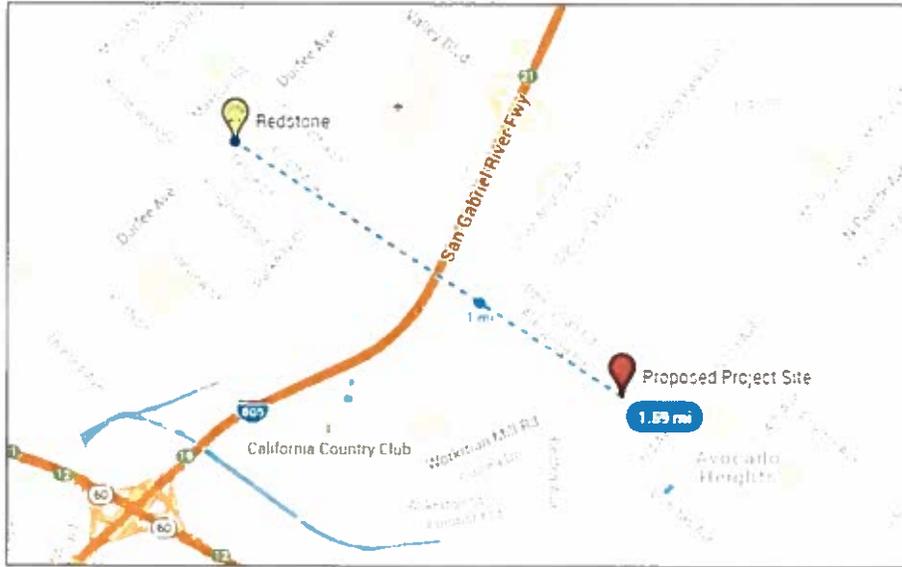
40. This grant shall authorize the construction and maintenance of an unmanned 35-foot high monopine wireless telecommunications facility and appurtenant equipment.
41. Submit plans to the County of Los Angeles Department of Public Works, Building and Safety Division, La Puente District Office for review and permit issuance.

02/18/15

## MONOPINES IN THE SURROUNDING COMMUNITY

The bulk of Verizon's wireless facilities in the proposed project area are either monopoles or rooftop facilities. There is currently one monopine, "Redstone," in the project's surrounding community, which was built in 2003 (see below). Please note that monopine aesthetics have drastically improved since then.

"Redstone" | 2520 Durfee Ave., El Monte, CA | *Built in 2003*



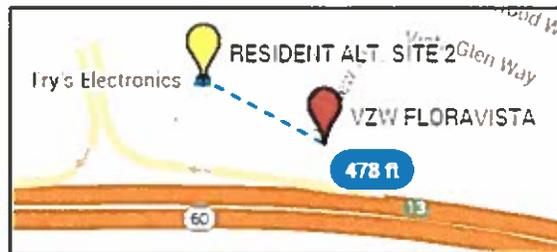
## ALTERNATIVE SITES

### *Verizon's Alternative Sites*

- Bassett Bible Church | 371 Workman Mill Rd., La Puente, CA 91746
- Evergreen Baptist Church | 323 Workman Mill Rd., La Puente, CA 91746

### *Resident-Proposed Alternative Sites*

1. **California Country Club** | 1509 Workman Mill Rd., City of Industry, CA 90601
  - AT&T and T-Mobile wireless facilities | North end of the golf course
2. **Fry's Electronics** | 13401 Crossroads Parkway North, City of Industry, CA 91746
  - VzW Site, "Floravista" will be built about 478 feet southeast of Fry's Electronics.



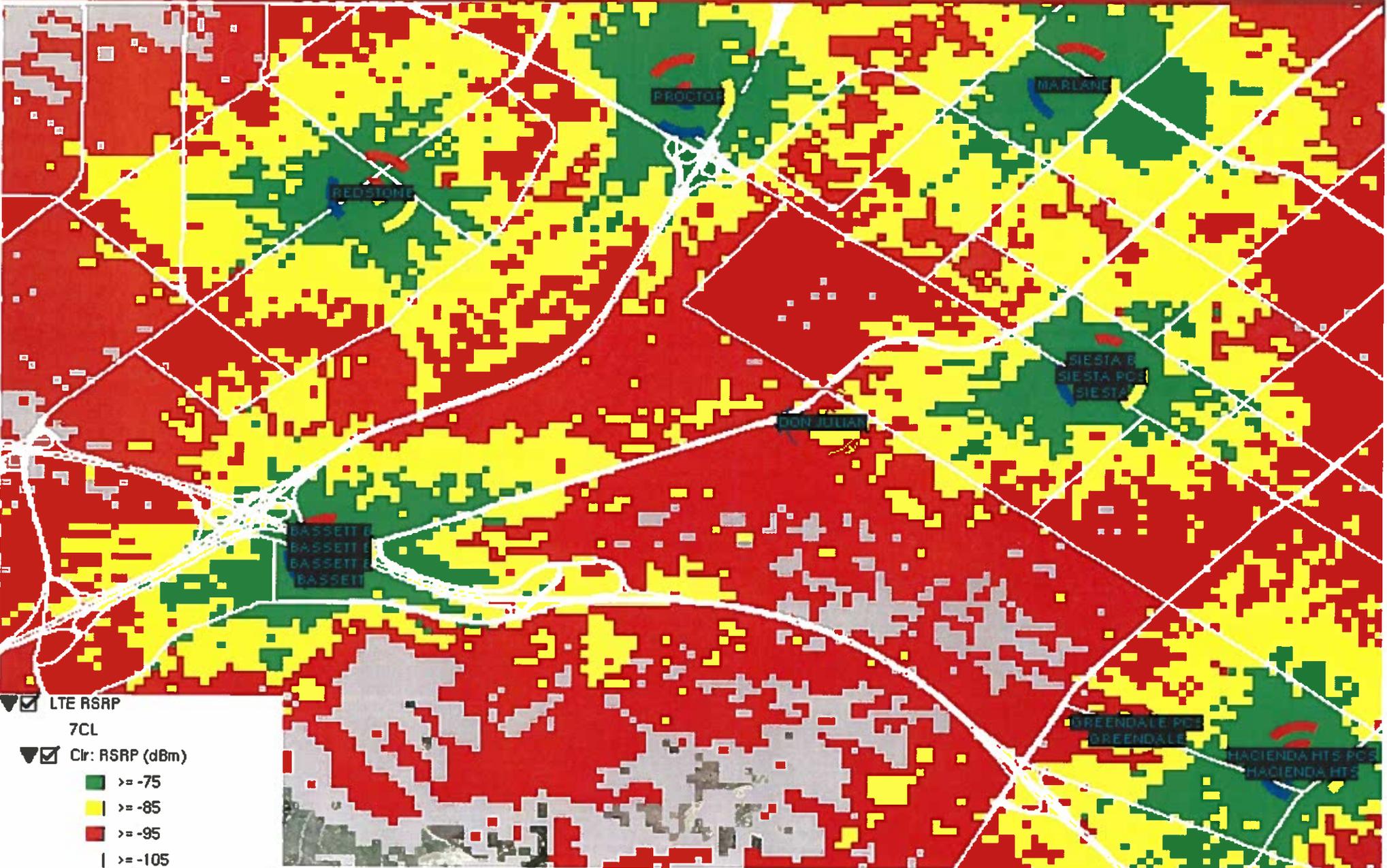
3. **Industrial/Commercial Area** | West of S. 7<sup>th</sup> Ave. & Don Julian Rd.
  - Verizon Site, "Greendale" was recently upgraded so it provides wireless coverage to the resident proposed industrial/commercial area.
4. **North Side of Valley Blvd.** | Between S. San Angelo & Workman Mill Rd.
  - Verizon Site, "Siesta" would be approximately 221 feet north of the resident proposed alternative location: the north side of Valley Blvd.



### *Resident-Proposed Combination of Alternative Sites*

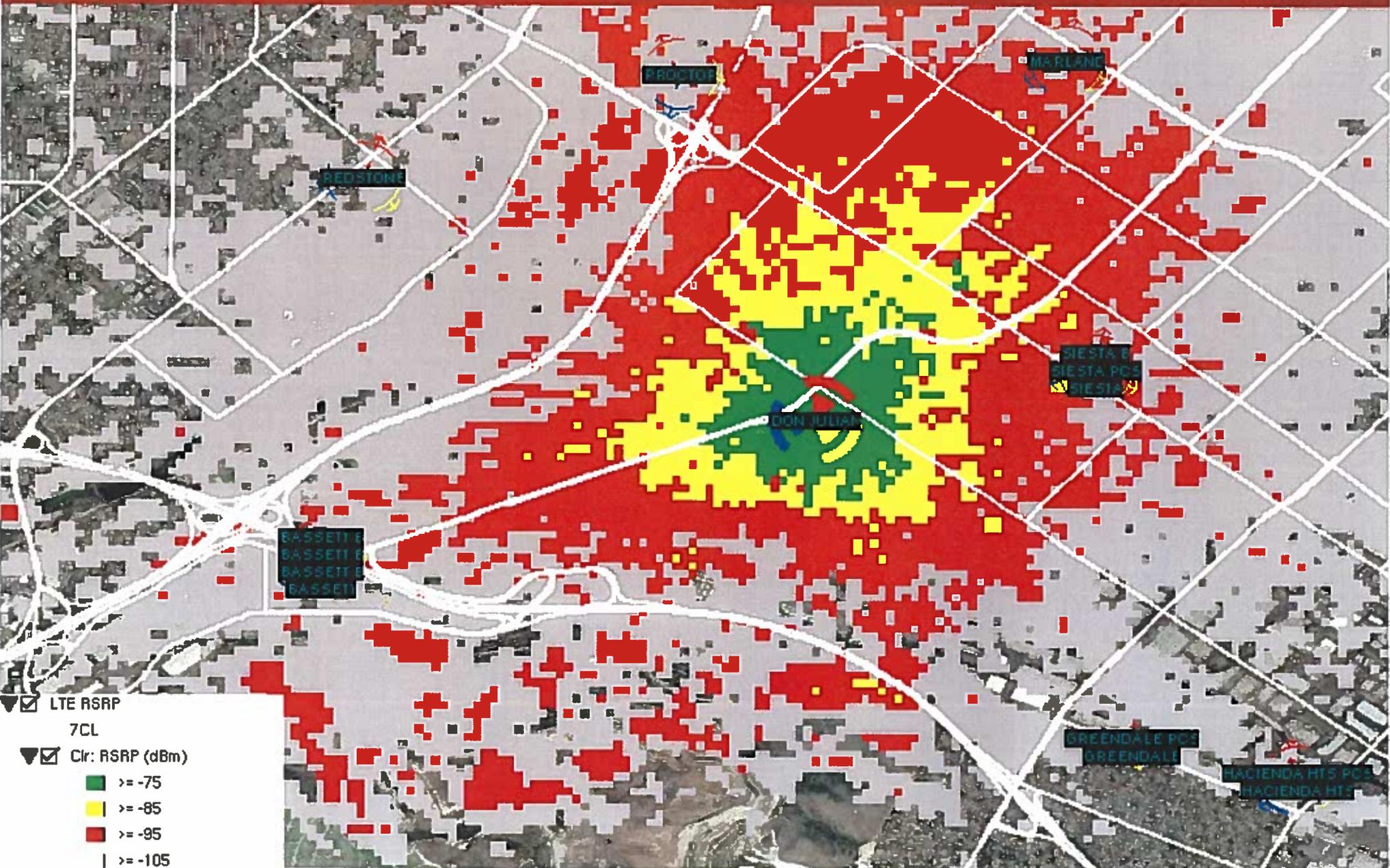
- Alternative Site 3 + Alternative Site 5
- Alternative Site 1 + Alternative Site 3

# Without Don Julian

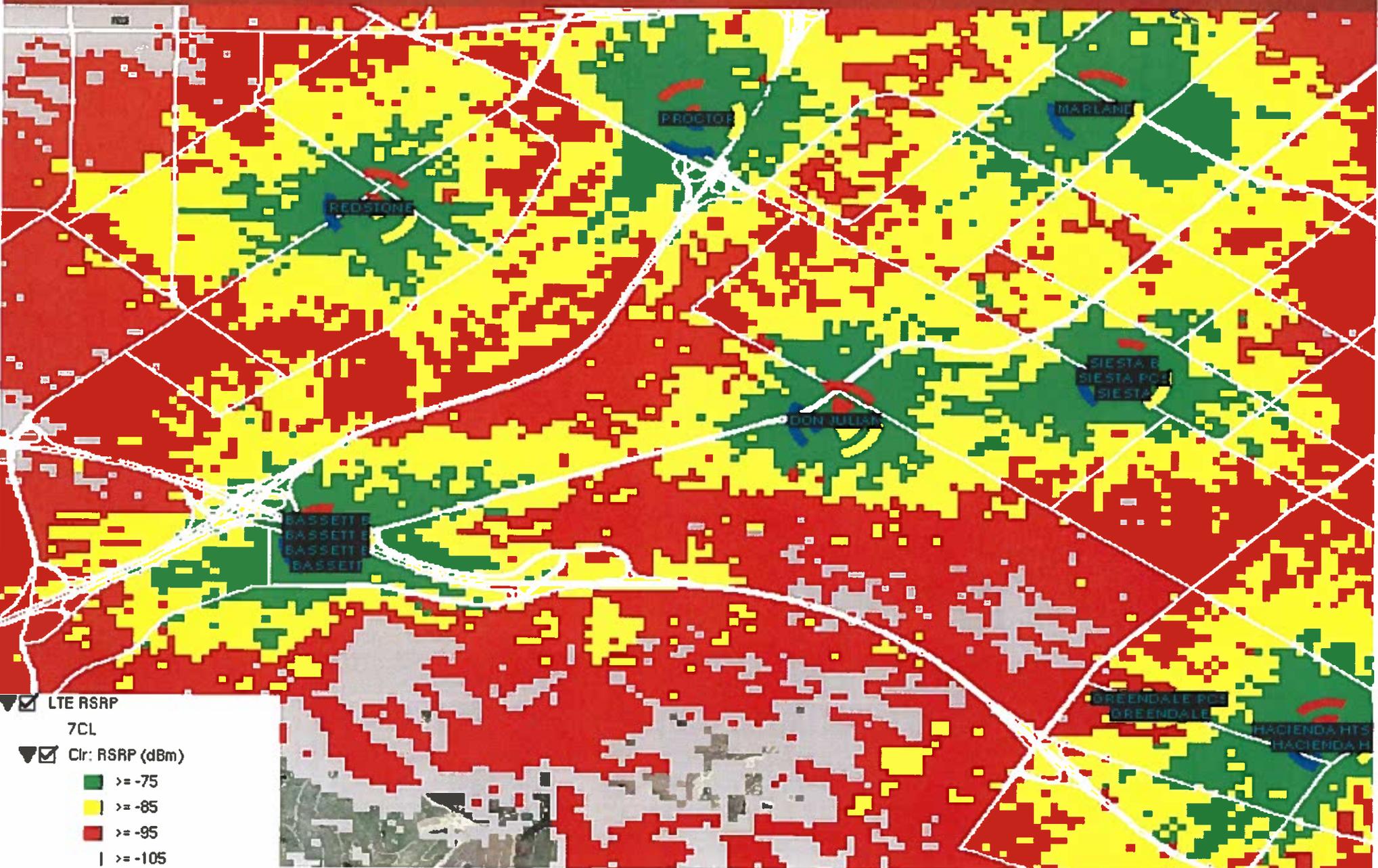


- LTE RSRP
- 7CL
- Clr: RSRP (dBm)
- >= -75
- >= -85
- >= -95
- >= -105

# Don Julian Coverage – Site by itself



# Don Julian and Neighboring Sites



- LTE RSRP
- 7CL
- Clr: RSRP (dBm)
- >= -75
- >= -85
- >= -95
- >= -105

**CONCERNED RESIDENTS OF AVOCADO HEIGHTS**  
**RESPONSE LETTER**

Thank you for recognizing that the proposed project requires further investigation due to the availability of alternative sites. Although the following information is lengthy, we respectfully request that you carefully read and note all arguments in order to fully understand why the subject CUP for the installation of a monopole facility at 510 Workman Mill Rd should be **DENIED**. We offer the following comments and information for your review:

**Alternative Sites**

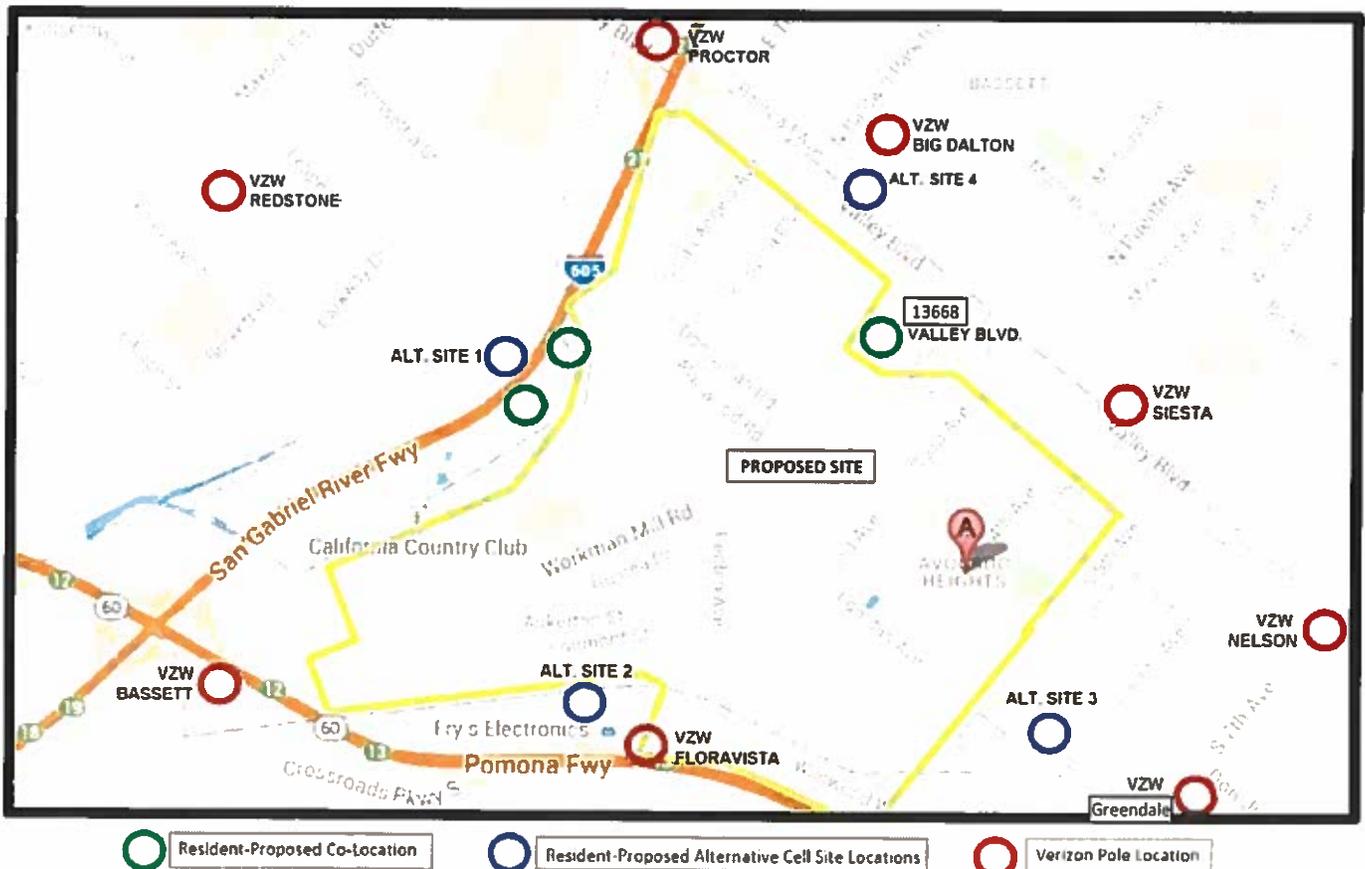
Verizon’s Alternative Site Analysis lists 3 existing/proposed sites (Floravista, Greendale, and Big Dalton) near alternative locations that we have suggested. These sites should be included in their coverage intensity maps in order to more accurately depict their true cellular coverage in Avocado Heights. With the addition of these sites to the coverage map, it should show a significant improvement in coverage in Avocado Heights and the proposed monopole should no longer be warranted.

Verizon may claim that even with the inclusion of these poles a gap in coverage will still exist, but the gap will be far smaller and will not substantiate the need the installation of a brand new telecommunications facility within our residential community.

Lastly, please note that it is fair to assume that all 3 of the existing/proposed sites (Floravista, Greendale, and Big Dalton) were located on the assumption that the site proposed at 510 Workman Mill Rd would be installed, which is very plausible given Verizon strategically places their cell sites to maximize coverage. If this is the case, these existing/proposed locations can also be reconfigured and/or relocated in order to efficiently utilize existing monopoles that are available for collocation, and completely eliminate the need for a new monopole within our community.

Below is a map showing Avocado Heights and the surrounding existing and proposed monopoles:

**Existing and Proposed Monopoles Surrounding Avocado Heights**



However, if Verizon remains adamant about their need for a new monopole, AND CAN TECHNICALLY JUSTIFY THE GREAT NEED FOR STRONGER COVERAGE within our community, we recommend the following updated information:

- **Alternative Site 1 (Golf Course- 1509 Workman Mill Rd, City of Industry, CA 90601)**

- Verizon's Alternative Site Analysis states that this site is not feasible for collocation, which we cannot argue. However, there are no technical, legal, or physical limitations that that will prevent the installation of a new pole at this alternative location. Verizon states that existing trees may need to be removed and those that remain may interfere with their signal, which will not be the case. There is more than ample space available along the 605 Freeway border and most existing trees are less than 20 feet in height.
- Verizon also states that **Alternative Site 1** is too far and that they will be required to cross the length of the golf course, therefore diminishing their signal strength. This would be true if the length of the golf course was significant, but it measure less than 500 feet across. Also, these 500 feet serve as a great buffer from residential areas. The additional distance could be offset by an increase in monopole height given that this location is within the City of Industry, who allow for greater monopole heights, consequently resulting in a larger radius of coverage.
- At minimum, a formal TECHNICAL analysis should be conducted and documentation provided with respect to installation of a monopole at this site. The County may also benefit from contacting the owner and City of Industry directly to discuss the feasibility of housing the proposed telecommunication facility at **Alternative Site 1**.
- Additional Observations
  - There is also an existing billboard at **Alternative Site 1** that can possibly be utilized.
  - There is an existing Edison lattice tower nearby that can be utilized and is approximately 200 feet to the west. Although the existing tower is further away from Verizon's area of focus and may result in a small reduction in increased cellular coverage, it will allow for the utilization of an existing structure of similar character and be far less visually intrusive.
  - Below is an overhead view of **Alternative Site 1** and Verizon's supplied photo of their cellular equipment mounted on an existing SCE lattice tower for your reference:

**Alternative Site 1**



### Existing SCE Lattice Tower with Verizon Mounted Equipment

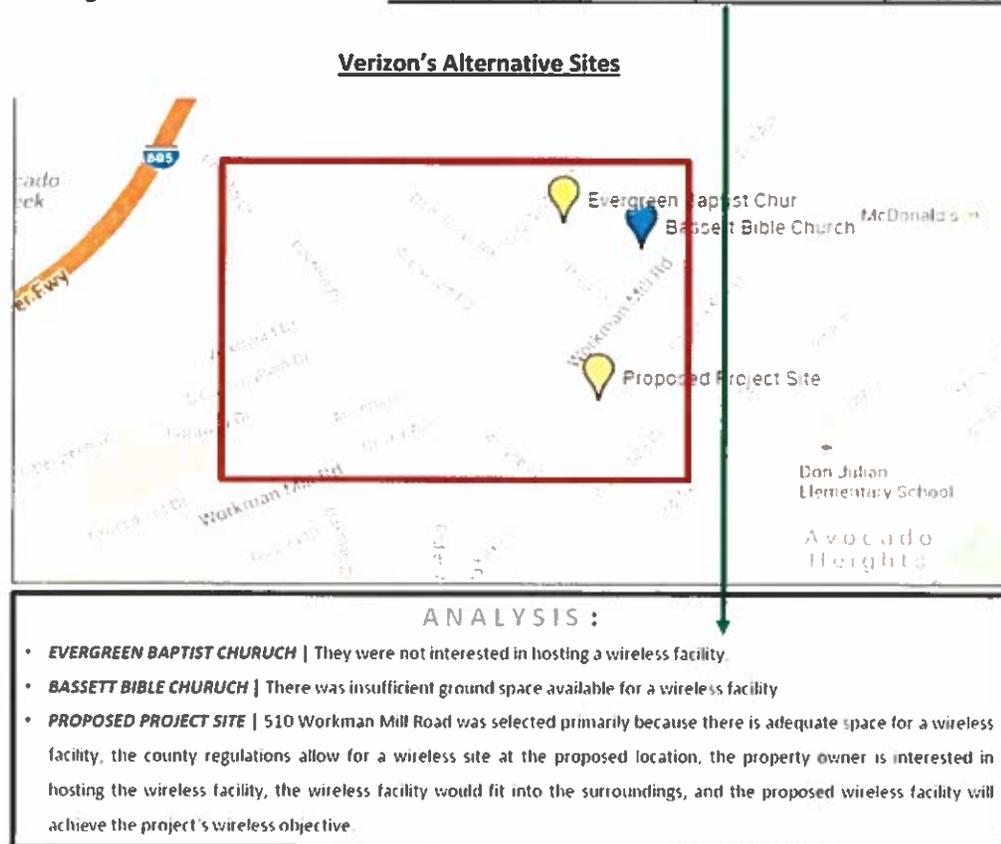


1082 Colorado St. Palo Alto

- It is reasonable and financially viable for Verizon to simply install a new pole at, or utilize the SCE lattice tower near **Alternative Site 1 (Golf Course- 1509 Workman Mill Rd, City of Industry, CA 90601)** in combination with all of its currently existing/proposed sites and achieve a significant improvement in coverage.
- **Alternative Site 2 (Fry's Electronics - 13401 Crossroads Parkway East, City of Industry, CA 90601)**  
**Alternative Site 3 (6<sup>th</sup> Ave Industrial Area)**  
**Alternative Site 4 (North Side of Valley Blvd)**
  - Verizon's Alternative Site Analysis states that existing/proposed sites (Floravista, Greendale, and Big Dalton) are located near the 3 above alternative sites. The Greendale site was shown on the previous coverage map, but with no intensity (i.e. green, yellow, and red colors). The Floravista and Big Dalton Sites are not shown at all. These poles need to be included in Verizon's current coverage intensity maps.
    - By including these poles in the current coverage intensity maps, it will significantly change the previously submitted coverage intensity maps and show improved coverage in areas that are currently shown to have weak or no cellular coverage. The resulting cellular coverage may still be below Verizon's preferred threshold but it will be an improvement nonetheless and eliminate the great need for a new monopole at 510 Workman Mill Rd.
  - Additional Observations
    - The foreseeable argument that Verizon's existing/proposed sites (Floravista, Greendale, and Big Dalton) do not currently exist, and therefore should not be included in Verizon's cellular coverage maps, is not valid given that Verizon is identifying them as part of their network within their Alternative Site Analysis.

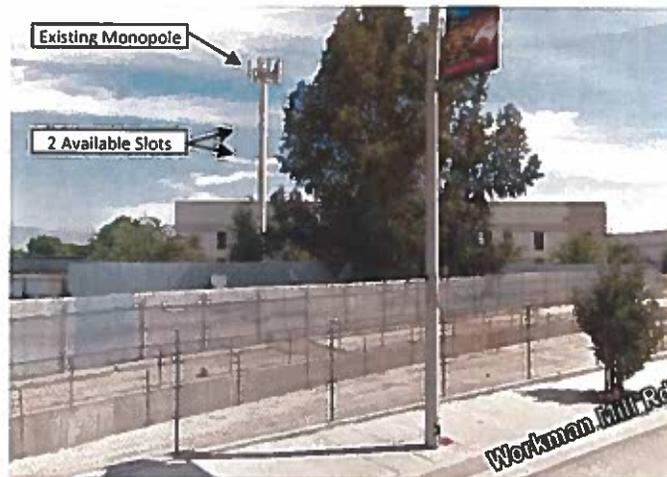
- Existing Monopole/ Alternative Site 5 (13668 Valley Blvd, La Puente/City of Industry, CA 91746)

- Verizon was specifically asked to study this location and provide their findings at the request of Hearing officer Garcia during a previous hearing. Verizon has not submitted any documentation or technical analysis on this site.
- Verizon’s Alternative Site Analysis states that this site does not have an existing telecommunications facility. We have reason to believe this is untrue. There is an existing monopole located at the southwest corner of this property. If this is not considered a telecommunications facility for any reason, the applicant must provide legal documentation, accompanied with technical justification, from the owner of the facility stating that this facility is incapable of collocation. Per Federal law, all telecommunication facilities must allow for collocation if available exists.
- It is reasonable and financially viable for Verizon to simply collocate at **Alternative Site 5** in combination with all of its currently existing/proposed sites (Floravista, Greendale, and Big Dalton) and achieve a significant improvement in coverage.
- At minimum, a formal TECHNICAL analysis should be conducted and documentation provided with respect to collocation at this site. The County may also benefit from contacting the owner and City of Industry directly to discuss the feasibility of housing the proposed telecommunication facility at **Alternative Site 5**.
- Additional Observations
  - This site is directly adjacent to Verizon’s two original alternative sites, **Bassett Bible** and **Evergreen Baptist Church**, which were included in their submittal package to Regional Planning. Given that the church sites were considered viable options, **Alternative Site 5** should be given equal, if not more, weight. Verizon’s reasons for not selecting the below alternative sites do not identify any technical problems with respect to location.



- In a previous hearing, the applicant stated that the installation of equipment at this site would still require the installation of a new pole at the shopping center. This argument is unfounded and cannot be considered credible unless equipment is actually installed on the existing pole first. Available sites must be used if viable.
- Monopoles are required to provide for collocation of future equipment and their utilization should take precedence over minor differences in resulting cellular coverage. The rationale that a new pole will provide slightly better coverage than collocation on an existing pole is unacceptable justification.
- This existing pole has at least 2 available slots for collocation of new equipment
- If Verizon claims that there will be an overlap in coverage due to the installation of equipment on this existing monopole, it is more than feasible for Verizon to simply relocate the proposed location of their Big Dalton existing/proposed site in order to achieve a more efficient distribution of cellular coverage.
- Below is a photo of **Alternative Site 5** from Workman Mill Rd:

**Alternative Site 5 (13668 Valley Blvd, La Puente/City of Industry, CA 91746)**



Below is an excerpt from the County Guidelines (boxed in red) that speaks to our findings:

**Excerpt from County Guidelines for the Installation of Telecommunication Facilities**

**Additional Application Materials**

Section 22.56.030.A.11 of the Zoning Ordinance allows the Director to request application materials deemed necessary in addition to those listed in section 22.56.030. For wireless facilities, in addition to all application requirements for a CUP, the applicant shall provide a written explanation, and documentation of, the following:

- A. That the proposed wireless facility is necessary to close a significant gap in coverage in the applicant's service;
- B. Except where the wireless facility is proposed to be co-located with one or more existing authorized wireless facilities that the applicant has undertaken and completed a good-faith effort to inventory all wireless facilities within one-quarter mile of the proposed site and to co-locate the proposed facility on the site of another such facility;
- C. That the proposed site is the least intrusive site that is available in the coverage area that is capable of closing the significant coverage gap in terms of visual and aesthetic impacts; and
- D. Documentation that the wireless facility as proposed is expected to comply with FCC limits and guidelines on RF emissions.

It is critical to pay close attention to the language within the County guidelines, such as:

**LEAST INTRUSIVE-**

This language supports the claim that if there is an alternative site that is less visually intrusive and capable of closing a significant gap in coverage, that site must be used.

**COVERAGE AREA-**

This language defines a larger area ("coverage area") for possible alternative locations. Our recommended alternative sites fall within Verizon's coverage area of concern.

**CAPABLE OF CLOSING THE SIGNIFICANT COVERAGE GAP-**

This language only refers to the closing of a significant coverage gap and does not require that this closure be the most optimal for the carrier. If Verizon installs the proposed monopole at an alternative location, it may not be the most optimal and lucrative, but it will most certainly close a significant gap in their existing coverage and provide improved service.

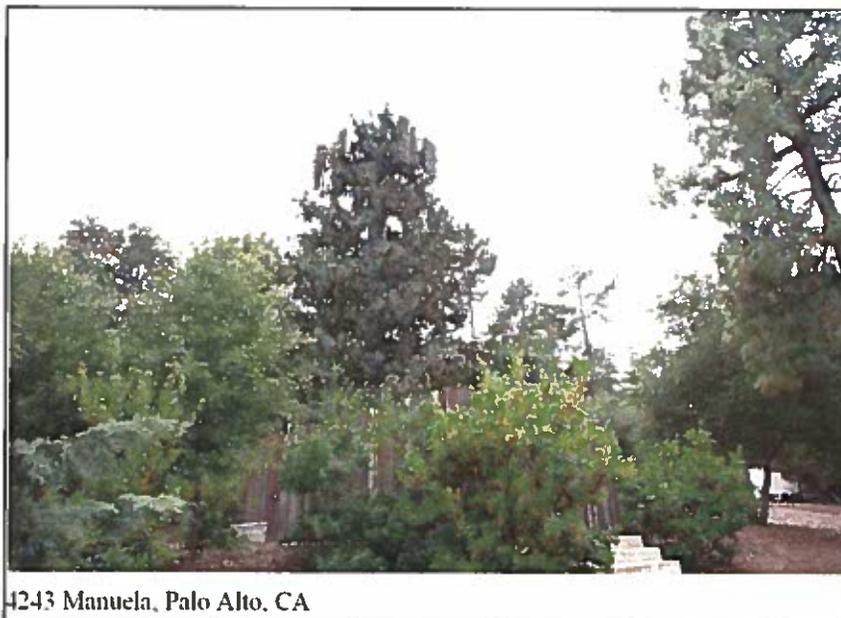
**The above information provides sufficient evidence of the availability of alternative sites within Verizon's coverage area that are far less visually intrusive and are capable of closing their gap in coverage in combination with their existing/proposed sites.**

## Visual Intrusion at Proposed Site

Installation of the proposed telecommunications facility at 510 Workman Mill Rd will result in an unacceptable level of visual intrusion resulting in negative impacts to the surrounding community. We would like to provide the following information:

- We recognize that there are visual enhancements that both Verizon has proposed and the County requires, which are being put in place in an effort to screen the proposed monopole and its accompanying equipment from the view of surrounding residents, but we feel very strongly that the proposed site greatly lacks the existing setting to adequately reduce visual intrusion and prevent negative visual impacts on the surrounding community.
- An appropriate setting would contain existing landscaping that seamlessly integrates the proposed monopole into its surroundings. A good example of acceptable integration was provided by Verizon below:

### Acceptable Setting for Integration of a Monopole



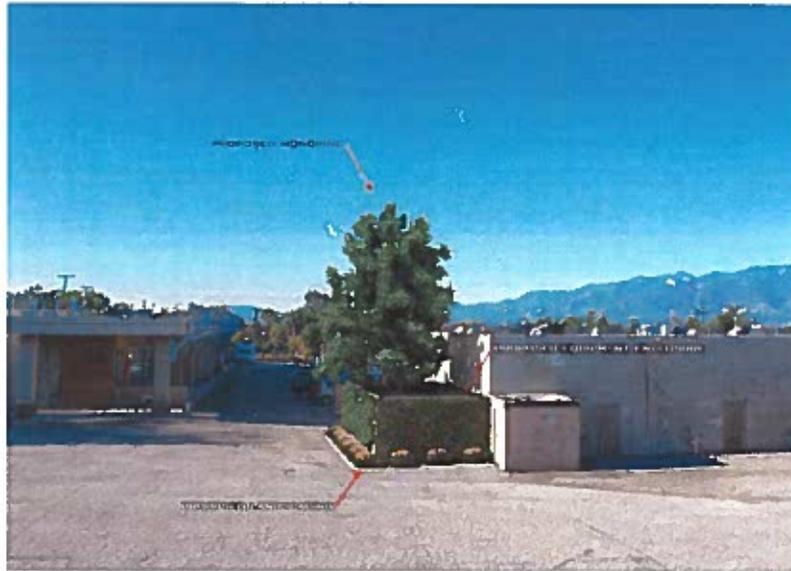
- Providing a similar, if not better, setting would be required at 510 Workman Mill Rd in order to acceptably integrate and screen the proposed monopole, and per Verizon's own admission in previous hearings, this is not possible due to driveways directly adjacent to the facility.

The adjacent photo shows that cars and trucks frequently drive and occupy the area adjacent to the proposed telecommunication facility. Semi-trucks also use this area regularly.



- Below is Verizon's rendering that provides an unacceptable and immitigable level of integration and screening:

**Verizon Rendering of Proposed Monopole**



- In the above rendering, there is no immediate landscaping to properly integrate and screen the proposed monopole from the adjacent residential properties. The minimal landscaping that is proposed is encroaching into the existing driveway, including the tree branches, and does little to screen the facility.

Below is an excerpt from the County Guidelines (boxed in red) that speaks to our findings:

**Excerpt from County Guidelines for the Installation of Telecommunication Facilities**

3. **Monotree:** It shall be of a type of tree compatible with those existing in the immediate area of the installation. If no trees exist within the immediate area, the applicant shall create a landscape setting that integrates the monotree with added trees of similar height and type. Antennas shall be painted or covered to match their background (branches or trunk). The antennas shall not extend beyond the monotree branches or fronds. There shall be ample branch coverage to hide the antennas from view as effectively as possible. Faux bark cladding shall be provided from the ground to five feet beyond where the faux branches begin; above the faux bark shall be flat non-reflective brown paint to match the bark. Additional camouflage may be required, depending on the type and design of mono-tree proposed.

It is critical to note the language within County guidelines, such as:

**IMMEDIATE AREA-**

This language emphasizes that existing landscaping in the "Surrounding" or "Approximate" area should NOT be considered as a screening accessory. Only landscaping/trees within the IMMEDIATE AREA should be considered, which in this case, do not exist. The area immediately surrounding the proposed monopole has no existing landscaping to blend into and consists of a concrete building and asphalt pavement driveway.

Verizon's existing facility at 4243 Manuela, shown in the above photo example, was installed in an area that contains the necessary IMMEDIATE setting to properly integrate and screen Verizon's new monopole.

**CREATE A LANDSCAPE SETTING THAT INTEGRATES THE MONOTREE WITH ADDED TREES OF SIMILAR HEIGHT AND TYPE-**

This language purposely does not specify a specific type of landscaping or number of trees since its intent is to require a setting that integrates the proposed monopole into the immediate surroundings. In this case, proper integration would require an array of trees and accompanying landscaping, similar to the setting provided at 4243 Manuela (shown above).

In order to eliminate visual intrusion into residential properties, several pine trees of similar height, along with accompanying landscaping in the surrounding area, must be planted **IMMEDIATELY** adjacent to the proposed facility along its east and south side. This would be the appropriate mitigation to eliminate any resulting visual intrusion from the installation of the proposed telecommunication facility, but as was previously noted this is not possible due to the existing legally dedicated use of the immediate area as a driveway for ingress and egress purposes.

**The above information provides sufficient evidence of the unacceptable and immitigable visual intrusion that will result if the proposed monopole is installed at 510 Workman Mill Rd.**

**Blighted Conditions on Property (conditions as of 2/3/15)**

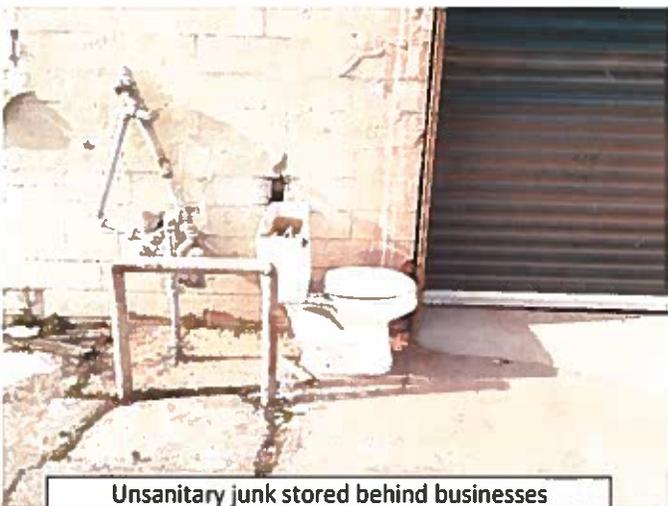
Although the condition of the shopping center property does not directly relate to the siting and design aspect of the proposed telecommunication facility, we feel the following observations should be noted given that it provides evidence of the CONSTANT eyesores that will only be magnified with the addition of a visually intrusive monopole.



**Dumped trash regularly goes unattended for weeks**



**Damaged buildings are in disrepair for months**



**Unsanitary junk stored behind businesses**



**Makeshift enclosed storage structure in disrepair**



**Trash and stored junk behind businesses**



**Dumped trash regularly goes unattended for weeks**

**Based on all of the above evidence provided, we respectfully request that the Regional Planning Commission DENY the subject CUP and recommend Verizon select a more adequate alternative site that is less visually intrusive to our community.**

**From:** Don Moss [d.moss@roadrunner.com]  
**Sent:** Thursday, January 22, 2015 11:28 AM  
**To:** Michele Bush  
**Cc:** amoreno@bos.lacounty.gov  
**Subject:** R2014-00792 / CUP-201400033

Hello Michele,

Please add this corrected observation to the file for Commission consideration:

I am opposed to this proposal because the installation further restricts available parking for the clients of the small businesses located immediately adjacent to the foot print of the cellular tower and supporting equipment. The project will also restrict the currently available maneuvering area for the long truck combinations which service the market during the off hours.

The available parking for the overall shopping center is minimal during heavy use periods. The coin laundry immediately adjacent to the proposed project requires all the parking which will be eliminated by the project. This area is not formally lined out for parking and as such was not considered as parking area on the current application documents. However, over the years, the volume of clients using the coin laundry and the other small businesses close to the project area has caused cars to overflow into these unmarked spaces.

Maximum available parking for clients of the businesses is critical for the success of those small businesses. Based on my observations since the current owner took over the property, this owner's focus does not include concerns for the health of his lessee's businesses. For example, this owner brought in a carnival several times a year which took over 75% of the formal parking lot for a week at a time.

The carnivals were only eliminated after local community activists lobbied for uniformed security to be on site during their runs. The property owner and / or the carnival operator declined to supply security so the Sheriff stopped approving their applications.

Keeping the project area clear for maneuvering of the long truck combinations during the off hours is another aspect of showing concern for the health of the lessee's businesses. As access by large vehicles becomes more difficult, suppliers are forced to make several deliveries with smaller vehicles. This less efficient supply process causes cost increases which must be passed on to the local customers.

Thank you for your consideration of these issues.

Don C. Moss  
Avocado Heights Community Advocate



# WORKMAN MILL ASSOCIATION, INC.

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POST OFFICE BOX 2146  
LA PUENTE, CALIFORNIA 91746

January 7, 2015

Department of Regional Planning  
320 West Temple Street  
Hall of Records  
Los Angeles, CA 90012

Dear Planning Commissioners:

Attention: Michele Bush, Planner

**SUBJECT: R2014-00792-(1), CUP 201400033**  
Proposed Verizon Wireless Telecommunication Facility

We strenuously object to a 35' high unmanned monopine wireless telecommunication facility at 510 Workman Mill Road, La Puente. This is immediately adjacent to our housing area. This facility, though 35' high, is just about at eye level of the homes on the slope above. This will be a terrible eyesore, even though it is disguised as a pine tree, and presents the very real possibility of cumulative radiation generation.

There are other locations in the immediate area, not adjacent to residents that need to be considered as more suitable for this unmanned facility. Please have the applicant investigate these alternate sites before making your decision. Your decision will have a life-long effect on many families.

Sincerely,

Ruth Wash, President  
Workman Mill Association

RW:iac  
cc: Supervisor Hilda Solis

JAN 21 2015

Et: \_\_\_\_\_