

September 5, 2012

LA City Council President Herb Wesson  
C/o City Clerk, Room 395  
City Hall  
200 North Spring Street  
Los Angeles, CA 90012-4801

Via email: [june.lagmay@lacity.org](mailto:june.lagmay@lacity.org)

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**RE: CF 09-2645 City Attorney Final Report on Placement of Cell Towers and Related Equipment**

Dear Councilmember Wesson,

As recently as June 4, 2012, The Brentwood Community Council (BCC) requested a temporary moratorium on PROW installations until such time as the revised AGF is enacted. Additionally, BCC strongly supports **revisions** of the City's Above Ground Facilities (AGF) Ordinance as recommended by the City Attorney to the PLUM and Public Works Committees in Council File 09-2645, and as **approved by both Committees**, in the following respects:

- **Expansion of the notice requirement** (currently limited to adjoining/abutting/across the street property owners/occupants)
- **Enhancement of the aesthetic provisions** (none currently exist)
- **Elimination of the utility pole exemption**
- **Imposition of permit duration limits** (currently none exist)

We support further inclusions:

- Provision for **public comment and/or hearing prior to permit issuance, for all proposed installations in residential zones** (currently no such hearings are provided for)
- Requirement for applicant to provide an **RF emissions analysis and/or certificate** of compliance with FCC requirements (no such provision in current ordinance)
- Requirement for the applicant to **map all existing wireless facilities and to project anticipated future needs** in the community served by the proposed facility.
- Expansion of the **right of appeal to "all aggrieved persons"** ((i.e. consistent with appeal rights under LA Zoning Code for CUPs private property installations; currently, appeal of AGF permits in the PROW is only afforded to the limited number of owners/occupants who received notice—a highly restrictive provision which stands alone among California cities).

- The applicant should be required to bear the expense of an **Independent Expert** to assist the City, as needed, with analysis of technical issues such as coverage gap claims, RF emissions and alternative location feasibility.

Thank you for your attention and time to these requests which will make the AGF Ordinance a welcome improvement to the quality of life for all of the residents of Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to be 'Joaquin Macias', with a long horizontal flourish extending to the right.

Cc: Joaquin Macias  
Bill Rosendahl  
Ted Jordan  
Councilmember Cardenas  
Councilmember Buscaino  
Councilmember Krekorian  
Councilmember Zine  
Councilmember Englander  
Eric Garcetti  
Councilmember Huizar  
Jan Perry  
Paul Koretz  
Councilmember LaBonge  
Councilmember Parks  
Councilmember Reyes  
Councilmember Wesson  
Councilmember Alarcon