

**From:** jreichmann [mailto:[jreichmann@sbcglobal.net](mailto:jreichmann@sbcglobal.net)]

**Sent:** Monday, September 03, 2012 03:15 PM

**To:** [june.lagmay@lacity.org](mailto:june.lagmay@lacity.org) <[june.lagmay@lacity.org](mailto:june.lagmay@lacity.org)>; [Patrice.Lattimore@lacity.org](mailto:Patrice.Lattimore@lacity.org) <[Patrice.Lattimore@lacity.org](mailto:Patrice.Lattimore@lacity.org)>

**Cc:** [councilmember.koretz@lacity.org](mailto:councilmember.koretz@lacity.org) <[councilmember.koretz@lacity.org](mailto:councilmember.koretz@lacity.org)>; [councilmember.wesson@lacity.org](mailto:councilmember.wesson@lacity.org) <[councilmember.wesson@lacity.org](mailto:councilmember.wesson@lacity.org)>; [councilmember.rosendahl@lacity.org](mailto:councilmember.rosendahl@lacity.org) <[councilmember.rosendahl@lacity.org](mailto:councilmember.rosendahl@lacity.org)>; [jreichmann@comstockhills.com](mailto:jreichmann@comstockhills.com) <[jreichmann@comstockhills.com](mailto:jreichmann@comstockhills.com)>

**Subject:** File No. CF 09-2646

## COMSTOCK HILLS HOMEOWNERS ASSOCIATION

[www.comstockhills.com](http://www.comstockhills.com)

September 3, 2012

LA CITY COUNCIL PRESIDENT HERB WESSON and Honorable Council Members  
City Hall, 200 North Spring Street, c/o City Clerk, Room 395  
Los Angeles, CA 90012-4801

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

RE: City Attorney Final Report on Cell Towers and Related Equipment

File No. CF 09-2645

I write on behalf of the Comstock Hills Homeowners Association representing approximately 300 homes in Westwood, south of Wilshire and east of Beverly Glen Blvd. We strongly support revision of the City's **Above Ground Facilities Ordinance** as recommended by the City Attorney to the PLUM and Public Works Committees and as approved by both committees. We support the following:

Expansion of the notice requirements;

Enhancement of the aesthetic provisions;

Elimination of the utility pole exemption; and

Imposition of permit duration limits.

In addition, we support expansion of appeal rights to all interested and/or aggrieved persons.

We hope that you will adopt them quickly. It is the only reasonable course of action that should be taken and is already endorsed by PLUM and Public Works.

Thank you for your consideration.

Sincerely,

Jan Reichmann, President CHHOA

1429 Comstock Avenue, Los Angeles, Ca. 90024 [310.666.9708](tel:310.666.9708) [jreichmann@comstockhills.com](mailto:jreichmann@comstockhills.com)

Cc: Councilmember Koretz



September 3, 2012

RE: CF # 09-2645

**Support Legislation Regulating Cell Towers,  
Above Ground Facilities**

Honorable Councilmember Englander:

For several years, wireless telecommunications providers have been taking advantage of deficiencies in the LAMC in order to place unsightly cell towers (AKA Wireless Telecommunication Facilities or WTFs) in close proximity to residences and along scenic routes. These companies have utilized exemptions granted to public utilities in order to place facilities within the public right of way (PROW) in areas where they would otherwise not be allowed. In 2009, the City Council directed the City Attorney to report on mechanisms available to regulate the placement of these WTFs. Subsequently, the City Attorney provided the requested report along with the following recommendations:

- **Elimination of the utility pole exemption**
- **Expansion of the notice provisions**
- **Enhancement of the aesthetic provisions**
- **Imposition of permit duration limits**

Numerous California municipalities have included several of the below listed provisions regulating PROW installations:

- **Provision for public comment and/or a hearing prior to permit issuance, for all proposed installations in residential zones.**
- **Requirement for the applicant to provide an RF emissions analysis and/or a certification of compliance with FCC requirements.**
- **Requirement for the applicant to map all existing wireless facilities and to project anticipated future needs in the community served by the proposed facility.**

Old Granada Hills residents and community leaders have been anxiously awaiting legislation that would effectively regulate the increasing number of WTF's attempting to locate in the PROW. There is no reason why LA cannot enact comprehensive legislation that includes reasonable requirements as many other California cities have done. Therefore, the Old Granada Hills Residents' Group **strongly urges** you to include all the above City Attorney's recommendations and additional listed provisions within the revised draft of the Cell Tower Ordinance. Furthermore, we urge you to **impose an immediate moratorium (Interim Control Ordinance)** on all Wireless Telecommunications Facility installations in the public right of way and/or applications for approval of such installations, until such time as the City enacts this Ordinance.

Thank You for Your Consideration,

Dave Beauvais, President  
Old Granada Hills Residents' Group

Maria Fisk, Board Member  
Old Granada Hills Residents' Group