In compliance with Governor Newsom's Executive Order N-29-20, which suspended portions of the Brown Act, Governor Newsom's Executive Order N-33-20 (Stay At Home Order issued March 19, 2020), and the County of Los Angeles Public Health Officer's Reopening Safer at Work and in the Community for Control of COVID-19 Blueprint for a Safer Economy – Red Tier Risk Reduction Measures (issued March 12, 2021), members of the Planning Commission and staff will participate in this meeting via teleconference or other electronic means in our continuing effort to practice social distancing to reduce the spread of COVID-19.

MEMBERS OF THE PUBLIC MAY VIEW AND PARTICIPATE IN THE HEARING via Zoom at: https://bit.ly/3doEVet or https://zoom.us/j/99440266065?pwd=Tzq3NlJNUm5SY3BveDFuYlJpYW1xQT09.
OR
To access the Zoom meeting, use the following credentials online or via phone (https://zoom.us / (669) 900-9128):
Meeting ID: 994 4026 6065
Password: 351192

MEMBERS OF THE PUBLIC MAY PARTICIPATE BEFORE THE HEARING by emailing CDDInfo@TorrranceCA.Gov and write "Public Comment" in the subject line. In the body of the email, include the item number and/or title of this item with your comments.

TELECOMMUNICATIONS COMMITTEE

The Telecommunications Committee meets on the second Tuesday of each month at 9:00 a.m. All meetings are open to the public via teleconference.

All persons interested in the above matter are requested to attend the virtual meeting or to submit their written approval or disapproval to the Telecommunications Committee, Community Development Department, City Hall, 3031 Torrance Boulevard, Torrance, CA 90503 or via Email at CDDInfo@TorranceCA.gov.

Actions of the Community Development Director or the Telecommunications Committee may be appealed by the applicant, City Council, City Manager, or other interested parties by filing a written notice of appeal along with the required appeal fee with the City Clerk within 15 days of the action.

For further information, contact the PLANNING DIVISION of the Community Development Department at (310) 618-5990.

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Community Development Department at (310) 618-5990. Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting. [28 CFR 35.102-35.104 ADA Title II]

PUBLIC COUNTER
HOURS OF OPERATION
Monday through Friday from
8:00 a.m. to 5:00 p.m.

Offices are closed alternate Fridays.
City Hall will be closed:

Friday, April 23, 2021

CITY OF TORRANCE
TELECOMMUNICATIONS COMMITTEE

VIA TELECONFERENCE
OR OTHER ELECTRONIC MEANS

TUESDAY, APRIL 13, 2021
9:00 A.M.

AGENDA

1. CALL TO ORDER

2. FLAG SALUTE

3. ROLL CALL / MOTIONS FOR EXCUSED ABSENCE

4. REPORT ON POSTING OF AGENDA

The agenda was posted on the Public Notice Board at 3031 Torrance Boulevard on April 2, 2021.

5. APPROVAL OF MINUTES

6. AGENDA ITEMS

A. WTC19-00015: Petition of **DELTA GROUPS ENGINEERING (SOUTHERN CALIFORNIA EDISON)** for approval of a Telecom Permit to allow the installation of a new telecommunications facility designed as a false tree and the installation of associated equipment on property located in the C-2 Zone at 21760 Madrona Avenue. This project is Categorically Exempt from CEQA per Guidelines Section 15303 – New Construction.

7. ORALS

This portion of the meeting is reserved for comment on items not on the agenda. Under the Ralph M. Brown Act, the Telecommunications Committee cannot act on items raised during public comment, but may respond briefly to statements made or questions posed; request clarification; or refer the item to staff. Speakers under Orals are limited to either Oral Communications #1 or Oral Communication #2 and no longer than 3 minutes per speaker. To participate, please register for the hearing via Zoom at https://bit.ly/3doEVet and use the "Raise Your Hand" feature when prompted. Your comments to the Telecommunications Committee meeting will be recorded as part of the Telecommunications Committee meeting. By staying online and making public comment during the Telecommunications Committee meeting, you are agreeing to have your audio recorded.

8. ADJOURNMENT

If you challenge any of the above matters in court, you may be limited to raising only those issues you or someone else raised at the public meeting described in this notice, or in written correspondence delivered to the Community Development Department or the office of the City Clerk, prior to the public meeting and further, by the terms of Resolution No. 88-19, you may be limited to ninety (90) days in which to commence such legal action pursuant to Section 1094.6 of the Code of Civil Procedure.

Members: Fulton, Pinela and Segovia

DATE: April 8, 2021

TO: Telecommunications Committee

FROM: Planning Division

SUBJECT: **WIRELESS TELECOM FACILITY (WTC19-00015)**

Request for approval of a Telecom Permit to allow the installation of a new telecommunications facility designed as a false tree and the installation of associated equipment on property located in the C-2 Zone at 21760 Madrona Avenue.

Applicant: Delta Groups Engineering (Southern California Edison)
Case No: WTC19-00015
Location: 21760 Madrona Avenue
Zoning: C-2 (General Commercial District)

The applicant is proposing a new telecommunications facility providing 12 antennas mounted on a 50' high false tree (mono-pine), in conjunction with three equipment cabinets located within a chain link fence enclosure. The proposal will install three sectors containing three antennas centered at 40' 6" high, with sectors facing northwest, northeast and southeast. The antennas will be screened by elements of the false tree including faux pine tree branches. Two equipment cabinets and a third future location along the north property line are proposed to be enclosed by an 8-foot tall chain link fence enclosure with 5 strand barbed wire. The equipment area will be located adjacent to two existing wireless facilities at a Southern California Edison substation and Staff finds that it will be adequately screened by the existing decorative block fence, solid gate and landscaping that encloses the site. However, Staff has concerns regarding the location of the proposed facility, as it would be the third facility at the subject property. In response, Staff has included a recommended Condition of Approval that the applicant shall continue to work with Staff to identify an ideal placement for the proposed facility at the site and that the applicant shall demonstrate an effort to collocate the existing Cell on Wheels (COW) onto the proposed mono-pine telecom facility. Furthermore, Staff has included a recommended Condition of Approval that the applicant continue to work with Staff to refurbish the perimeter landscaping with plant materials such as vines, groundcover, and a pine tree, to further blend the existing and proposed mono-pine facilities into the surrounding environment.

The wireless facility will feature a mono-pine design as a concealment method. As proposed, the branches will be installed at a height of 15' from ground level and continue to the top of the pole. Staff finds that the concealment method is adequate and has included recommended Conditions of Approval regarding the maintenance and containment of the overall design of the mono-pine.

In order to recommend approval of this application, the proposed telecommunication facility must conform to the height, location, technology and design standards. The maximum height allowed for a pole is regulated by the height specified in the zoning district. The facility is proposed in the General Commercial District (C-2 Zone) which does not specify a maximum building height. The applicant has provided documentation that the proposed site is intended to increase existing RF signal along in residential areas north and south of Carson Street between Flower Avenue and Fern Avenue.

The proposed mono-pine telecommunication facility is defined as a new false tree which falls into a Location Priority that requires a special review by the Telecommunications Committee. As described in the Alternative Candidate Site Analysis (Attachment #3) submitted by the applicant, multiple alternative sites in the surrounding community were investigated. The most feasible

alternative was a collocation with the existing mono-pine facility that would not meet Verizon's radio frequency coverage objectives due to the substandard height onto the existing facility. Therefore, the applicant has concluded that the subject site is the least intrusive, most compatible and will provide the needed coverage. The false tree, as conditioned, will give the applicant the height needed to meet their coverage objectives while simultaneously providing the least visually intrusive structure. Lastly, the application was reviewed by the City's telecom consultant, Telecom Law Firm PC for technical and regulatory issues and no issues were reported (Attachment #2).

Approval of this Telecom Permit is supported by the following findings:

a) That this approval is necessary to allow the facility to function as intended and identified alternatives to the proposal are not feasible because the applicant did not find other available leasing opportunities, and this site allows the applicant to meet their intended coverage objective.

b) The approved facility will not result in conditions which are materially detrimental to nearby property owners, residents and businesses, nor to public health or safety because the facility and equipment operate with very small amounts of noise, there are no fumes, smoke, or odors emitted, and the facility is unmanned requiring minimal maintenance trips therefore it will not impact current vehicular circulation on the public right of way or the private parcel.

In the judgment of Staff, the proposed telecommunication facility, as conditioned, conforms to the technology, height, location and design standards of Sections 92.39.040 and 92.39.050 of the Torrance Municipal Code and Staff recommends **APPROVAL** of the applicant's request, subject to the following conditions:

1. That the use of the subject property for a mono-pine telecom facility shall be subject to all conditions imposed in WTC19-00015 and any amendments thereto or modifications thereof as may be approved from time to time pursuant to Section 92.39.070 et seq. of the Torrance Municipal Code on file in the office of the Community Development Director of the City of Torrance; and further, that the said use shall be established or constructed and shall be maintained in conformance with such maps, plans, specifications, drawings, applications or other documents presented by the applicant to the Community Development Department and upon which the Telecommunications Committee relied in granting approval;

2. That if this Telecom Permit is not implemented within one year after the approval, it shall expire and become null and void unless extended by the Community Development Director for an additional period, as provided for in Section 92.27.1 of the Torrance Municipal Code; (Planning)

3. That this Telecom Permit shall be subject to comply with all codes in Article 39 of Chapter 2 of Division 9 and all other applicable codes in the Torrance Municipal Code; (Planning)

4. That the applicant shall ensure that all required frequency signage be installed and maintained at all times in good condition. All such radio frequency signage shall be constructed of hard materials and be UV stabilized. All radio frequency signage must comply with sign colors, sign sizes, sign symbols and sign panel layouts in conformance with ANSI Z535.1, ANSI Z535.2, and ANSI C95.2-2007 standards. All such radio frequency signage, or additional signage immediately adjacent to the radio frequency signage shall provide a working local or toll-free telephone number to its network operations center that reaches a live person who can exert transmitter power-down control over this site as required by the FCC; (Planning)

5. That the applicant shall replace the signage at the project site to comply with the current standards within 30 days in the event that the FCC changes any radio frequency signage requirements that are applicable to the project site herein or ANSI Z535.1, ANSI Z535.2, and ANSI C95.2-2007; (Planning)
6. That the applicant shall install mono-pine branches that extend at least two feet beyond all the antennas and tree-mounted transmission equipment and three feet above the top of the pole; (Planning)
7. That the applicant shall update and maintain all branches at all times in a way which results in the natural projection of a pine tree with a natural canopy; (Planning)
8. That all panel antennas, cables, transmission equipment including RRUs and DC/fiber cabinets, and antenna supports affixed to the mono-pine shall be painted a camouflage pattern of brown and green to the satisfaction of the Community Development Director; (Planning)
9. That all panel antennas shall at all times be covered with mock pine needle antenna socks; (Planning)
10. That all panels, RRUs and mounting hardware shall be painted a dark green-gray color to the satisfaction of the Community Development Director; (Planning)
11. That all branches shall be maintained at all times and that broken branches must be repaired or placed; (Planning)
12. That all antennas, RRUs and associated equipment shall be placed within the canopy of branches on the mono-pine; (Planning)
13. That all cables shall be inside the trunk of the mono-pine tree except at the bottom and at the level of antennas; (Planning)
14. That the branches shall be installed such that all antennas and other transmission equipment are located within the canopy of the faux pine tree; (Planning)
15. That the applicant shall submit Emission Standards and Non-Interference Data showing the specific frequency range that the facility will use upon and throughout activation, certification that the facility will continuously comply with FCC emissions standards, and that use of the telecom facility will not interfere with other communication, radio or television transmission or reception; (Planning)
16. That the applicant shall obtain all necessary permits and approvals including but not limited to FAA approval, building permits, etc.; (Planning)
17. That the applicant shall provide for co-location opportunities for future carriers on the mono-palm and the height shall not be increased to the satisfaction of the Community Development Director; (Planning)
18. That three-dimensional bark cladding from the base to the top of the trunk arm of the mono-pine shall be used to the satisfaction of the Community Development Director; (Planning)
19. That the mono-pine shall incorporate the maximum number of faux pine tree branches per manufacturer's standards and to the satisfaction of the Community Development Director; (Planning)
20. That the applicant shall submit color samples to the Community Development Department prior to the issuance of building permits; (Planning)

21. That all lines to the pole (power, phone, electrical, etc) be underground and that no cable "dog house" be allowed; (Planning)
22. That the applicant shall continue to work with Staff to identify an ideal placement of the proposed wireless telecommunications facility, subject to the satisfaction of the Community Development Director; (Planning)
23. That the applicant shall demonstrate an effort to collocate the existing Cell on Wheels onto the proposed wireless telecommunications facility, subject to the satisfaction of the Community Development Director; (Planning)
24. That the applicant shall continue to work with Staff to refurbish the perimeter landscaping around the substation site to include more vines, groundcover, and a pine tree, subject to the satisfaction of the Community Development Director; (Planning)
25. That if more than 500 square-feet of landscaping is refurbished, a landscape plan that complies with the latest California Water Efficient Landscape Ordinance shall be submitted to the Community Development Department for approval prior to the issuance of any building permits, shall be implemented prior to occupancy and that such landscaping shall be maintained to the satisfaction of the Community Development Director. The plan shall utilize drought tolerant California friendly vegetation, shade-producing trees, and shall provide a state-of-the-art water saving irrigation system and/or drip irrigation for all landscape areas; (Planning)

The Committee is advised that Code Requirements applicable to this project are attached for your review.

Prepared by,

Eric Martin
Planning Assistant

Recommended by,

Oscar Martinez
Planning & Environmental Manager

Attachments:
1. Code Requirements
2. Notification Map & Posting
3. Telecom Law Firm Memorandums
4. Alternative Candidate Site Analysis
5. Supplemental Technical Information Report and Documentation
6. Coverage Maps
7. Photo Simulations
8. Site Plan and Elevations (Limited Distribution)

This request for a Telecom Permit (WTC19-00015) is ____APPROVED ____ DENIED per Ordinance No. 3561, Section 92.39.060, Wireless Telecommunication Facilities, of the Torrance Municipal Code, Division 9.

_____
DATE

_____
Felipe Segovia
Telecommunications Committee Chair

Decisions made by the Telecommunications Committee are appealable to the Planning Commission within 15 calendar days following the above date of approval/denial.

CODE REQUIREMENTS

The following is a partial list of code requirements applicable to the proposed project. All possible code requirements are not provided here and the applicant is strongly advised to contact each individual department for further clarification. The Community Development Director may not waive or alter the code requirements. They are provided for information purposes only.

Planning:

1. No light shall be permitted for the Telecom facility except for security lighting and such lighting shall be shielded so that direct rays do not shine on nearby properties. (92.39.050)
2. No signage or identifying logos shall be displayed on the telecommunication facility. (92.39.050)
3. Submit a radio frequency compliance and radiation report prepared by a qualified RF engineer with 30 days after installation of the telecom facility. (92.39.070)
4. Must comply with TMC Section 92.39.090 regarding discontinued use or abandonment of facility.

Building and Safety:

1. Obtain all necessary permits

Environmental:

1. Verify that the equipment cabinets will comply with the Torrance Noise Ordinance. If an emergency generator is required, it must also comply with the Torrance Noise Ordinance.

Engineering

1. A Construction and Excavation Permit (C&E Permit) is required from the Community Development Department, Engineering Permits and Records Division, for any work in the public right-of-way on Madrona Ave. (City Code Sec. 74.6.2)

ATTACHMENT 1

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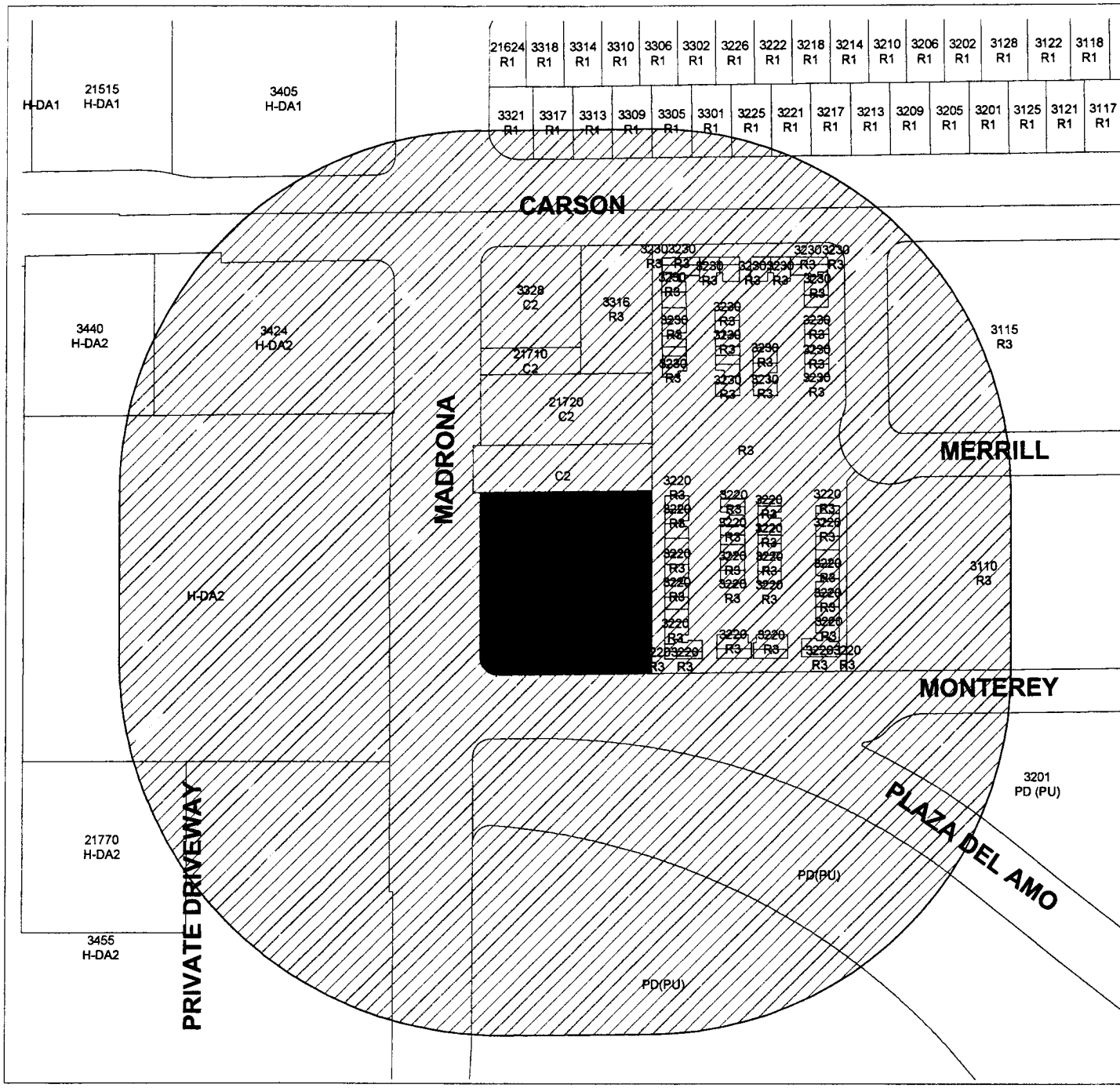
ATTACHMENT 1



LOCATION AND ZONING MAP

21760 MADRONA AVENUE
WTC19-00015

LEGEND

NOTIFICATION AREA

PROJECT SITE

0 50 100 200 Feet

N W E S

Prepared using City of Torrance Community Development Geographic Information System
Danny E. Santana, Community Development Director

ATTACHMENT 2

TELECOM
LAW FIRM PC

WIRELESS PLANNING MEMORANDUM

TO: Mr. Aaron Whiting
FROM: Dr. Jonathan Kramer
DATE: February 21, 2020
RE: WTC19-00015 (Verizon Wireless)
Request to Install a New Wireless Site-Monopine located near 21760 Madrona Avenue

Site Name: Patronella
Site ID: MTX43/BSC11

1. Summary

The City of Torrance (the "**City**") requested that Telecom Law Firm, PC ("**TLF or We**") review the Delta Groups Engineering ("**Applicant**") proposal, on behalf of Verizon Wireless ("**Verizon**"), to construct and operate a new wireless site, a monopine, located near 21760 Madrona Avenue.

Based on the materials submitted by the Applicant, the City should conclude that (1) Section 6409(a) does not apply to this project; (2) the proposed location appears to be suitable ; (3) the overall design of the wireless facility is decent and the City should consider the design recommendations within section 5 of this memorandum; (4) the proposed project demonstrates planned compliance with the FCC Rules (not including the microwave antenna); and (5) the microwave antenna should be removed from the project proposal absent additional supplemental information provided by the Applicant.

This memorandum reviews the application and related materials for regulatory, design, and technical issues specific to wireless infrastructure. Although many technical issues implicate legal issues, the analysis and recommendations contained in this memorandum do not constitute legal advice.

2. Project Description

This memorandum addresses the following questions: (1) whether Section 6409(a) applies to Verizon's proposal; (2) design elements of the proposed site; and (3) whether the proposal demonstrates planned compliance with the federal radio frequency exposure guidelines.

On February 18, 2020, the Applicant submitted application materials on behalf of Verizon. The submitted plans dated September 13, 2019 ("**Plans**") show that Verizon proposes to construct a new 50-foot above ground level ("**AGL**") monopine with associated base station equipment.

The proposed monopine will support twelve panel antennas in three sectors (four antennas per sector). The panel antennas are to be center mounted at approximately 40'6" AGL, with (12) remote radio units ("**RRUs**") mounted behind the antennas. Verizon also proposes to install one GPS Antenna, one microwave dish antenna, a 15kw diesel generator and three DC power surge suppressors ("**Raycaps**").

For a full summary of the installation, see the project description in Figure 1.

PROJECT DESCRIPTION

THIS PROJECT IS A VERIZON WIRELESS UNMANNED TELECOMMUNICATION WIRELESS FACILITY. IT WILL CONSIST OF THE FOLLOWING:

- NEW VERIZON WIRELESS (43' X 29'-9") EQUIPMENT CABINETS AND ANTENNA LEASE AREA
- (2) NEW VERIZON WIRELESS EQUIPMENT CABINETS
- (1) FUTURE VERIZON WIRELESS EQUIPMENT CABINET
- (1) NEW VERIZON WIRELESS GPS ANTENNA
- (1) NEW VERIZON WIRELESS 15 KW / 54 GALLON (UL 142) DIESEL STANDBY GENERATOR
- (1) NEW VERIZON WIRELESS 50'-0" TALL MONOPINE
- (12) NEW VERIZON WIRELESS 8' TALL PANEL ANTENNAS
- (12) NEW VERIZON WIRELESS RADIOS
- (3) NEW VERIZON WIRELESS RAYCAPS
- (1) NEW VERIZON WIRELESS METER PEDESTAL
- (1) NEW VERIZON WIRELESS 4'-0"ø MICROWAVE ANTENNA

Figure 1: Project description (Source: Plans, title page T-1).

TLF would like to point out the future equipment cabinet within the project description. We recommend that the City request from the Applicant the removal of all future elements until ready for active usage.

Figure 2 shows an elevation view of the monopine with details.

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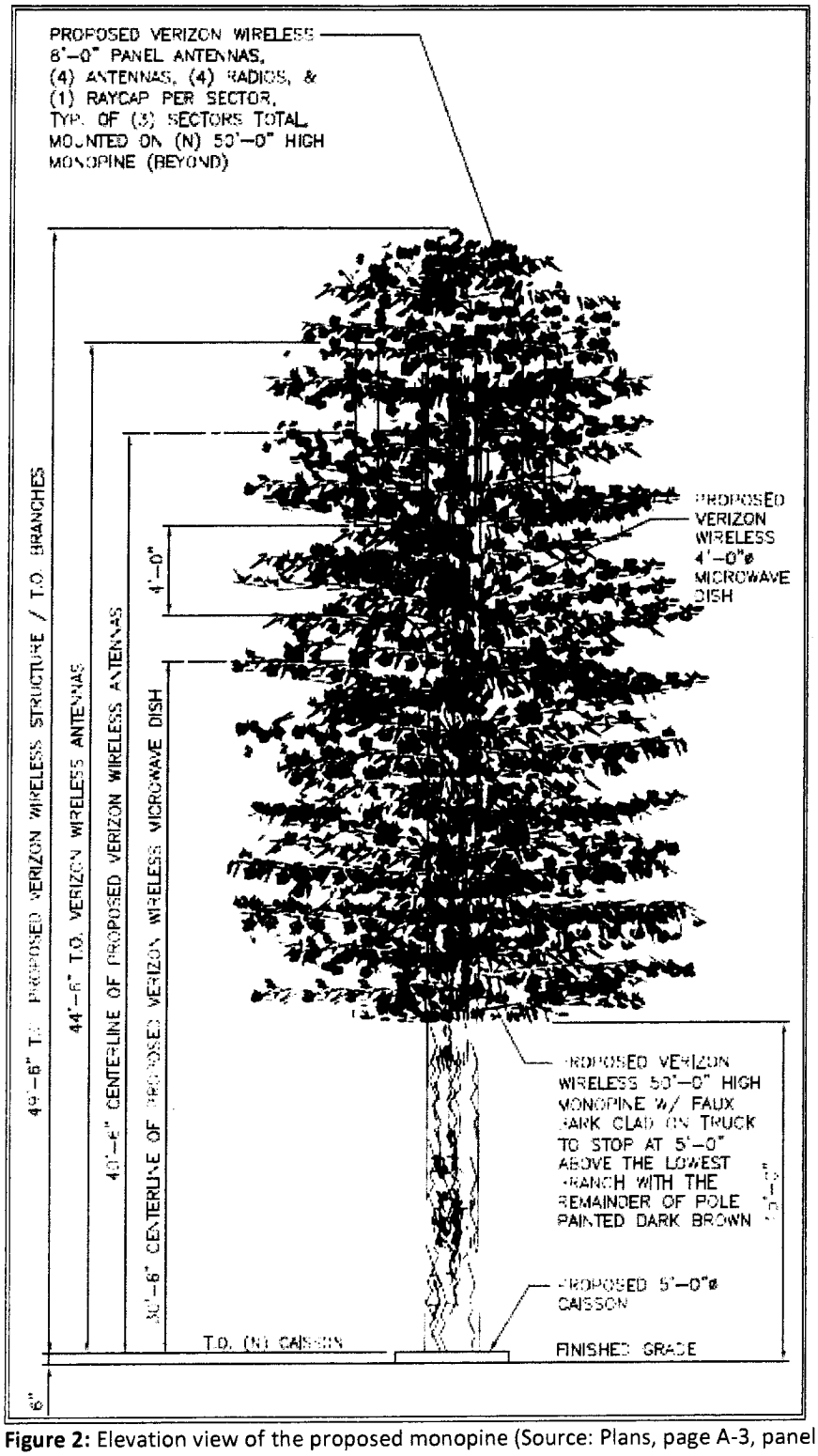

Figure 2: Elevation view of the proposed monopine (Source: Plans, page A-3, panel 3).

Telecom Law Firm PC

Figure 3 depicts a simulated view of the proposed monopine.

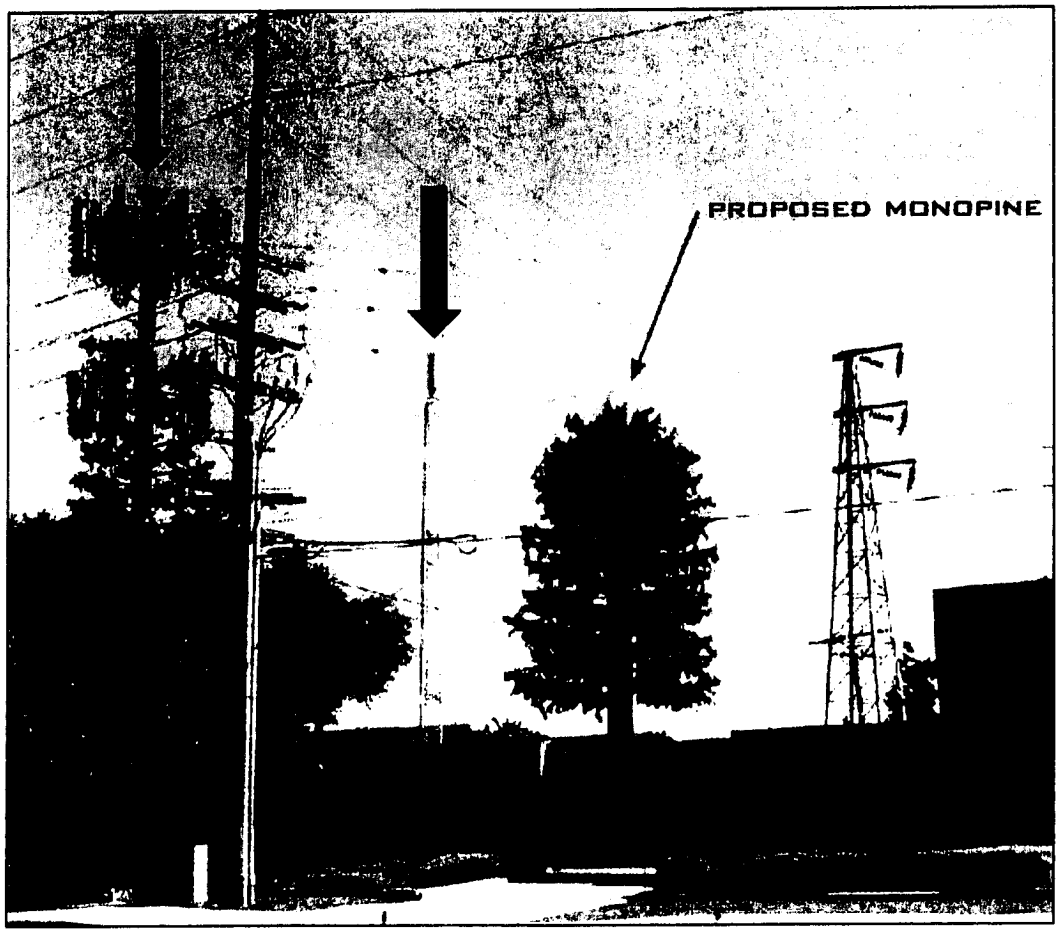

Figure 3: Photo simulation of proposed monopine; red arrows showing existing wireless facilities. (Source: Applicant submitted Photo Simulations; red arrow annotations by Dr. J. Kramer).

There are two existing wireless facilities on the same parcel:

- A monopine
- A cell on wheels ("**COW**")

See Figure 4 for the proposed ground-mounted equipment within the leasehold area.

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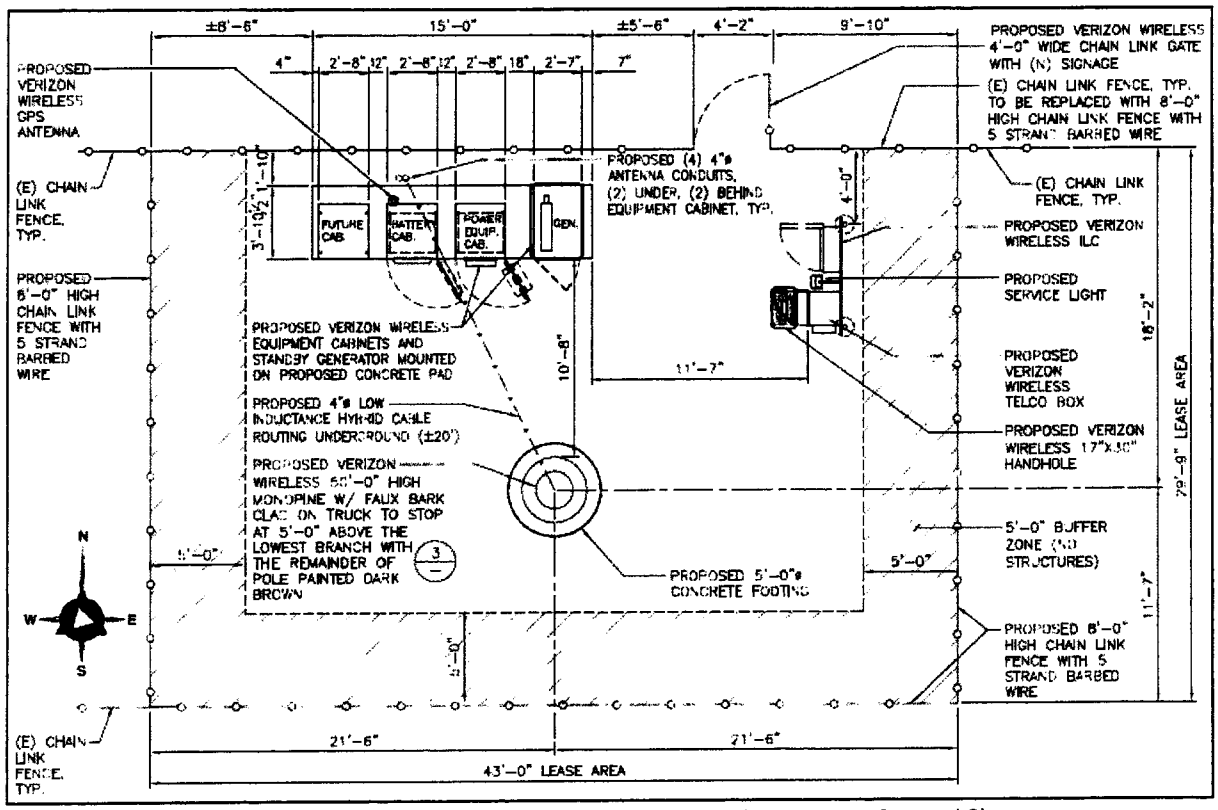

Figure 4: Proposed ground-mounted equipment layout plan (Source: Plans, page A-2, panel 2).

Verizon's twelve panel antennas will be distributed in three Sectors. Sector 1 will be oriented toward 140° true north ("**TN**"), Sector 2 will be oriented toward 320° TN and Sector 3 will orient toward 50° TN. Figure 5 depicts the antenna layout plan for each sector.

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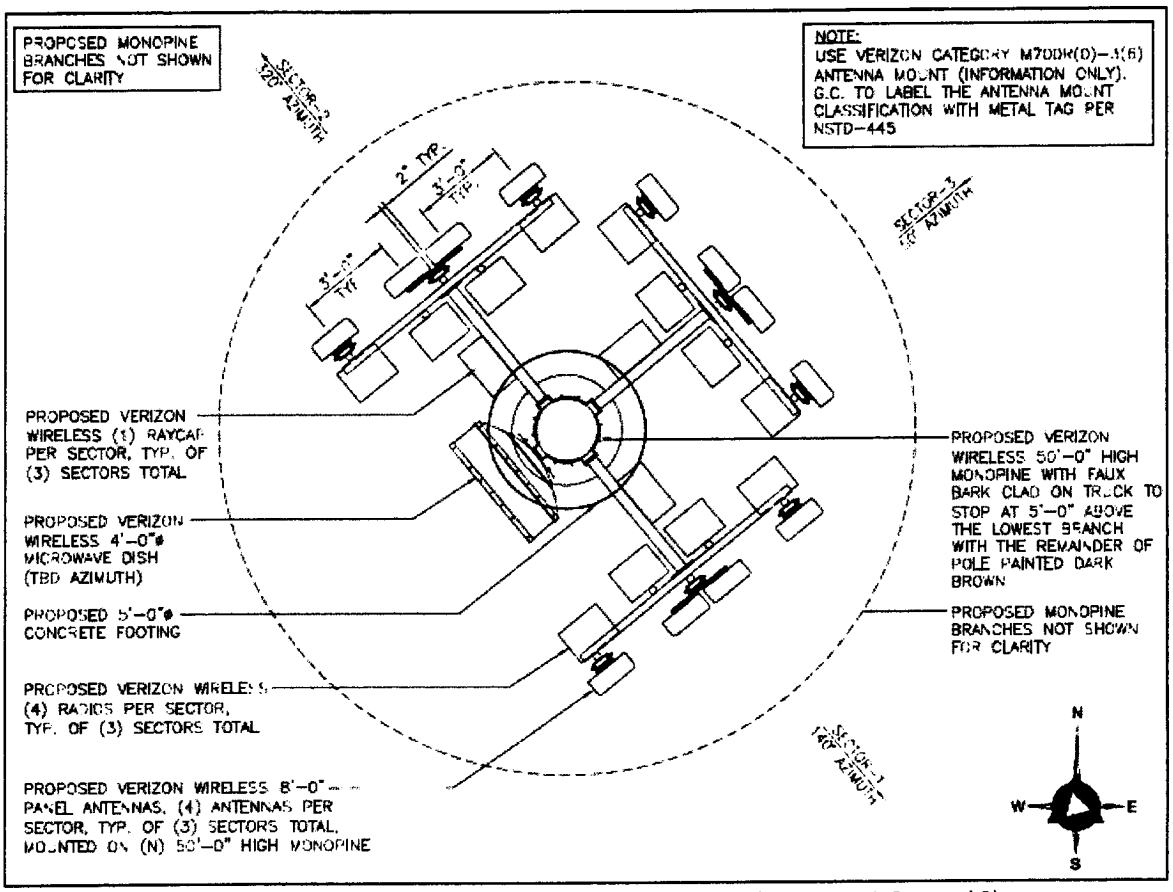

Figure 5: Proposed antenna layout and associated equipment (Source: Plans, page A-2, panel 3).

TLF notes the Plans show the azimuth for the microwave dish antenna as 'to be determined' ("**TBD**").

3. Section 6409(a) Analysis

As a threshold matter, the City must determine whether federal law mandates approval for this permit application. Section 6409(a) of the Middle Class Tax Relief and Job Creation Act of 2012 requires that State and local governments "may not deny, and shall approve" an "eligible facilities request" so long as the proposal does not result in a "substant[ial] change." The applicant bears the burden to prove that its proposal qualifies.

Section 6409(a) applies only when the applicant demonstrates an eligible facilities request that does not substantially change the physical dimensions of the facility.

The proposed wireless facility does not physically exist yet, therefore, it is not an eligible facility (does not have physical nor legal existence). Therefore, it is not subject to Section 6409(a) analysis.

3.1. Section 6409(a) Conclusion

TLF concludes that Section 6409(a) does not apply to this permit request because Verizon did not submit an eligible facilities request. This conclusion does not mean that the City should necessarily deny the permit request, only that federal law does not mandate approval. Accordingly, the City should review this permit request under its normal processing for wireless permits.

4. Least Intrusive Means Analysis

Under the federal Telecommunications Act of 1996 ("**Telecom Act**"), State and local governments cannot prohibit or effectively prohibit personal wireless communication services.[1] The United States Court of Appeals for the Ninth Circuit holds that a single permit denial can violate the Telecom Act when the applicant demonstrates that (1) a "significant gap" in its own service coverage exists and (2) its proposed site constitutes the "least intrusive means" to mitigate that significant gap.[2] This section discusses both issues as related to the present application.

4.1. Least Intrusive Means

The Telecom Act does not grant the applicant the right to build whatever site in whatever location it chooses. State and local jurisdictions may require wireless applicants to adopt the "least intrusive means" to achieve their technical objectives.[3] This balances the national interest in wireless services with the local interest in planned development.

In the Ninth Circuit, the least intrusive means refers to the technically feasible and potentially available alternative design and location that most closely conforms to the local values a permit denial would otherwise serve.[4] A "technically feasible and potentially available alternative" means that the applicants can reasonably (1) meet their demonstrated service needs and (2) obtain a lease or other legal right to construct the proposed site at the proposed location.[5]

The process to determine whether a proposal constitutes the least intrusive means involves a "burden-shifting" framework. First, the applicant establishes a presumption that it proposes the least intrusive means when it submits an alternative sites analysis. Localities can rebut the presumption when it proposes other alternatives. Applicants may then rule-out proposed alternatives when it provides a "meaningful comparative analysis" for why an alternative is not

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[1] *See* Section 704 of the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. § 332(c)(7)(B)(i)(II).
[2] *See MetroPCS, Inc. v. City and County of San Francisco*, 400 F.3d 715, 733 (9th Cir. 2005).
[3] *See, e.g., American Tower Corp. v. City of San Diego*, 763 F.3d 1035, 1056 (9th Cir. 2014).
[4] *See id.; see also Verizon USA, Inc. v. City of Anacortes*, 572 F.3d 987, 995 (9th Cir. 2009).
[5] *See Anacortes*, 572 F.3d at 996–999.

technically feasible or potentially available.[6] This back-and-forth continues until either the jurisdiction fails to propose a technically feasible or potentially available alternative, or the applicant fails to rule-out a proposed alternative.[7]

Applicants cannot rule-out potential alternatives on the ground that it believes its preferred site is subjectively "better" than the jurisdiction's preferred alternative.[8] Only the local government can decide which among several feasible and available alternatives constitutes the best option. Similarly, an applicant cannot rule-out a proposed alternative based on a bare conclusion that it is not technically feasible or potentially available—it must provide a meaningful comparative analysis that allows the jurisdiction to reach its own conclusions.[9]

4.2. Alternative Sites Analysis

The Applicant submitted a search ring and discussed an alternative location to collocate onto the existing nearby monopine on the same parcel. Per the Applicant, the collocation was declined by SCE and after months of working with SCE the present design was agreed upon. See Figure 6 for the search ring.

Figure 6: Applicant's alternative locations marked with yellow 'pins'; (Source: Applicant submitted search ring).

[6] *See American Tower Corp.*, 763 F.3d at 1056.

[7] *Compare id.* (upholding a permit denial because the applicant failed to rule-out the technical feasibility or potential availability of proposed alternatives), *with Anacortes*, 572 F.3d at 999 (invalidating a permit denial because the city insisted on an unavailable location). These cases provide a guide for planners on how to evaluate alternative site analyses. Planners should also note that a strong administrative record is essential to this analysis.

[8] *See American Tower Corp.*, 763 F.3d at 1057 (finding that the applicant "did not adduce evidence allowing for a meaningful comparison of alternative designs or sites, and the [c]ity was not required to take [the applicant]'s word that these were the best options").

[9] *See id.*

The Applicant also identified, within its Alternative Sites Analysis, ten other alternative locations that were not viable due to varying reasons.[10] From a desktop review, it appears to TLF that the proposed location is a suitable location.

5. Design Comments and Recommendations

The monopine design appears to be an appropriate concealment technique. Although the proposal already exhibits some desirable design elements, the City should consider specific conditions to improve the overall concealment of the project.

TLF recommends the following design conditions as conditions of approval for the project:

1. Permittee shall install monopine branches that extend at least two feet beyond all the antennas and tree-mounted transmission equipment, and three feet above the top of the pole (the monopine's trunk).

2. Permittee shall update and maintain all branches at all times in a way which results in the natural projection of a pine tree with natural canopy.

3. All panel antennas, cables, transmission equipment including RRUs and DC/fiber cabinets, and antenna supports affixed to the monopine shall be painted a camouflage pattern of brown and green as approved by the Town.

4. All panel antennas shall at all times be covered with mock pine needle antenna socks.

5. All panels, RRUs and mounting hardware shall be painted a dark green-gray color approved by the City.

6. All branches shall be maintained at all times. All broken branches need to be repaired or replaced.

7. All antennas, RRUs and associated equipment shall be placed within the canopy of branches on the monopine.

8. All cables shall be inside the trunk of the monopine tree except at bottom and at level of antennas.

The branches must be installed in such that all antennas and other transmission equipment, as well as antenna support brackets, are located within the canopy of the faux pine tree.

[10] See Applicant Alternative Sites Analysis for the 10 alternate locations and explanations.

These conditions are not intended and should not be interpreted as an exhaustive list. The City may wish to impose any additional conditions necessary or appropriate to promote compliance with the Code and generally applicable public health and safety codes.

6. Planned RF Compliance Evaluation

Under the Telecommunications Act of 1996, State and local governments cannot regulate wireless sites based on the environmental effects from radiofrequency ("**RF**") emissions to the extent that such emissions comply with applicable FCC regulations.[11] The FCC occupies the field with respect to RF emissions regulation with comprehensive rules for maximum permissible exposure (the "**FCC Rules**").[12] State and local governments cannot establish their own RF standards—whether more strict, more lenient or even the same. However, State and local governments may require an applicant to demonstrate "planned compliance" with the FCC Rules.[13]

Wireless antennas generally operate at relatively low power, and do not require an in-depth environmental analysis when virtually inaccessible to the general public.[14] The FCC Rules "categorically exclude" when its antennas are mounted (1) to structure solely or primarily built to support wireless antennas and (2) more than 10 meters above ground level.[15]

Here, the FCC Rules categorically exclude the Verizon panel antennas (excluding the microwave antenna) because the antennas are mounted on a monopine—a structure solely or primarily built to support wireless antennas—and all of the transmitting antennas are at least 10 meters AGL. The lowest point of the panel antennas is situated at 40'6" feet AGL.

TLF notes that the microwave antenna poses a potential CEQA issue. Microwave antennas of the type shown connect to other similar microwave antennas at other sites. Here, Verizon proposed a microwave antenna with a TBD azimuth. This element should connect to a disclosed existing microwave antenna elsewhere. As microwave antennas require other microwave antennas to connect to, the possible conclusions are that (1) Verizon either has a microwave antenna at another site, which likely is not permitted; (2) the other microwave antenna is outside of the City boundary; (3) Verizon is piecemealing this project.

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[11] *See* 47 U.S.C. § 332(c)(7)(B)(iv).

[12] *See* 47 C.F.R. § 1.1307 *et seq.*; *see also* FCC Office of Engineering and Technology Bulletin 65.

[13] *See* In re Procedures for Reviewing Requests for Relief from State and Local Regulations Pursuant to Section 332(c)(7)(B)(iv) of the Communications Act of 1934, *Report and Order*, 15 FCC Rcd. 22821, 22828–22829 (Nov. 13, 2000) (declining to adopt rules that limit demonstrations of compliance).

[14] *See generally* Human Exposure to Radio Frequency Fields: Guidelines for Cellular and PCS Sites, *Consumer Guide*, FCC (Oct. 22, 2014), *available at* https://www.fcc.gov/guides/human-exposure-rf-fields-guidelines-cellular-and-pcs-sites (discussing in general terms how wireless sites transmit and how the FCC regulates the emissions).

[15] *See* 47 C.F.R. § 1.1307(b)(1).

In either case, the City should direct Verizon to demonstrate (1) that the proposed microwave antenna is to connect to an existing, properly permitted microwave antenna; or (2) to remove this element from the project.

Accordingly, the FCC Rules categorically exclude this site from the need for routine compliance demonstrations. A categorical exclusion does not exempt a transmitter from *actual* compliance. The FCC Rules still require Verizon to affirmatively prevent unknowing access to areas where the emissions exceed the maximum permissible limits.

Verizon can demonstrate planned compliance with the FCC rules through the following recommended conditions:

1. Permittee shall ensure that all required radio frequency signage be installed and maintained at all times in good condition. All such radio frequency signage be constructed of hard materials and be UV stabilized. All radio frequency signage must comply with the sign colors, sign sizes, sign symbols, and sign panel layouts in conformance with ANSI Z535.1, ANSI Z535.2, and ANSI C95.2-2007 standards. All such radio frequency signage, or additional signage immediately adjacent to the radio frequency signage, shall provide a working local or toll-free telephone number to its network operations center that reaches a live person who can exert transmitter power-down control over this site as required by the FCC.

2. In the event that the FCC changes any of radio frequency signage requirements that are applicable to the project site approved herein or ANSI Z535.1, ANSI Z535.2, and ANSI C95.2-2007 standards that are applicable to the project site approved herein are changed, Permittee, within 30 days of each such change, at its own cost and expense, shall replace the signage at the project site to comply with the then current standards.

/JLK

TELECOM
LAW FIRM PC

APPLICATION INCOMPLETE MEMORANDUM

TO: Mr. Aaron Whiting
FROM: Dr. Jonathan Kramer
DATE: December 4, 2019
CITY ID: WTC19-00015
SITE: Patronella

APPLICANT: Delta Groups Engineering on behalf of Verizon Wireless
RE: Application Completeness Review – New Proposed Wireless Facility in the Public Right-of-Way near 21760 Madrona Avenue

1. Summary

Telecom Law Firm, PC ("**TLF" or "We**") concludes that Delta Groups Engineering (the "**Applicant**") submitted an application on behalf of Verizon Wireless ("**Verizon**") that is not a materially complete application. The list of incomplete items within this memorandum contains TLF's observations. The City of Torrance (the "**City**") may have other items for the incomplete notice.

TLF recommends that the City deem this application incomplete and issue a timely incomplete notice to the Applicant no later than December 12, 2019 (based on the November 12, 2019 submission tender date). TLF recommends that the City send the incomplete notice by email and on the same day also sends it by First Class or Certified U.S. Mail postage prepaid.

The incomplete items in this memo contains TLF's observations. If the City is aware of other incomplete items, the City should include those other items in its incomplete notice letter that also transmits this memorandum to the Applicant.

This proposed project has an overall 150 day shot clock since the Applicant is proposing to construct a wireless facility on brand-new Monopine. November 13, 2019 was Day 1 on the overall 150 day shot clock. If the City timely submits an incomplete notice by December 12, 2019 then the shot clock will stop and only resume when the Applicant resubmits additional information.

2. Discussion

The City requested that TLF review the Applicant's application to construct a new 50' tall Monopine ("**Monopine**") at an SCE substation located near 21760 Madrona Avenue.

The Applicant submitted a set of plans dated September 13, 2019 ("**Plans**"). The Plans show that, on the Monopine, Verizon proposes to install 12 panel antennas and associated equipment.

Verizon also plans to install one 15kw diesel generator, one 4' microwave antenna, one meter pedestal and equipment cabinets within the lease area. For a full scope of the Applicant's proposed installation, see Figure 1.

PROJECT DESCRIPTION

THIS PROJECT IS A VERIZON WIRELESS UNMANNED TELECOMMUNICATION WIRELESS FACILITY. IT WILL CONSIST OF THE FOLLOWING:

- NEW VERIZON WIRELESS (43' X 29'-9") EQUIPMENT CABINETS AND ANTENNA LEASE AREA
- (2) NEW VERIZON WIRELESS EQUIPMENT CABINETS
- (1) FUTURE VERIZON WIRELESS EQUIPMENT CABINET
- (1) NEW VERIZON WIRELESS GPS ANTENNA
- (1) NEW VERIZON WIRELESS 15 KW / 54 GALLON (UL 142) DIESEL STANDBY GENERATOR
- (1) NEW VERIZON WIRELESS 50'-0" TALL MONOPINE
- (12) NEW VERIZON WIRELESS 8' TALL PANEL ANTENNAS
- (12) NEW VERIZON WIRELESS RADIOS
- (3) NEW VERIZON WIRELESS RAYCAPS
- (1) NEW VERIZON WIRELESS METER PEDESTAL
- (1) NEW VERIZON WIRELESS 4'-0"ø MICROWAVE ANTENNA

Figure 1: Applicant's proposed project description (Source: Plans, Page T-1).

See Figure 2 for a Photo Simulation of the proposed Monopine.

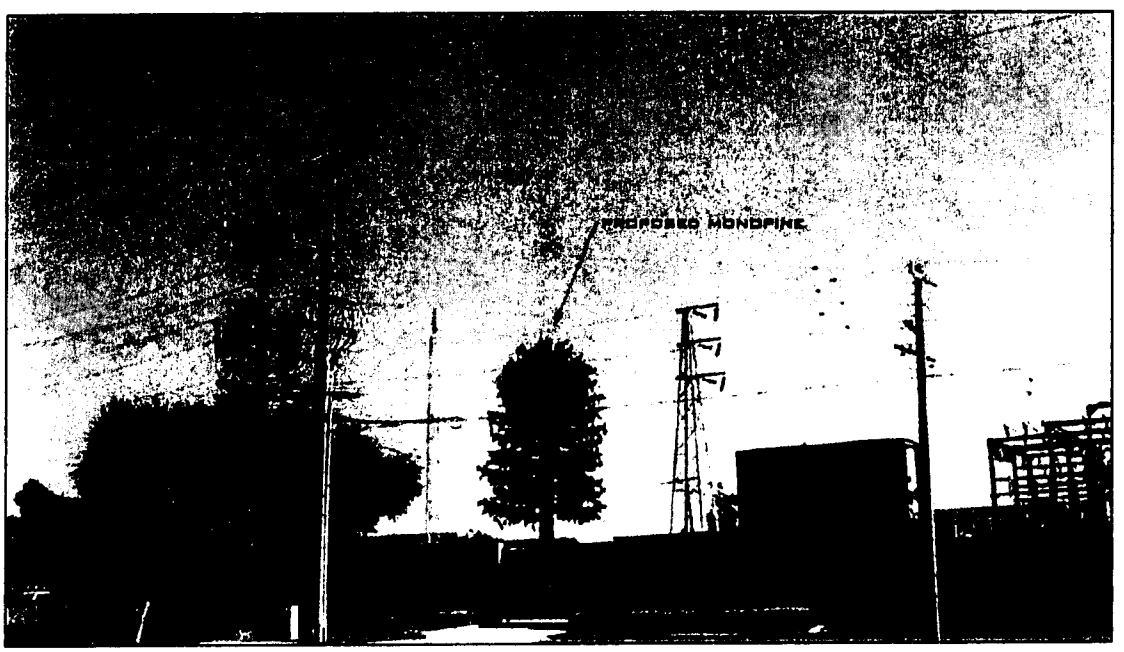


Figure 2: Photo simulation of proposed Monopine; annotations in original (Source: Applicant submitted Photo Simulations).

TLF notes that there is another existing Monopine on the same parcel as well as a cell on wheels ("**COW**") for LARICS.

Telecom Law Firm PC

This memorandum reviews the Applicant's submitted documents to determine whether the Applicant has now submitted a materially complete and responsive application.

A. APPLICATION COMPLETENESS REVIEW

Based on the City's Submittal Requirements for Wireless Telecommunications Facility ("**Requirements Form**"), TLF recommends that the City deem the Applicant's application submittal **incomplete** and issue an incomplete notice on or before December 12, 2019 regarding the items more fully discussed within this incomplete memorandum.

Supplemental Technical Information Report ("STIR"):

Section 3.03: Incomplete. The Applicant has not fully filled out this section. The Applicant shall check off all the intended uses for this facility.

Section 3.07: Incorrect. The Applicant has entered the wrong height for the lowest antenna, which would be for the microwave antenna.

Section 3.09: Incomplete. Applicant has wrongly checked Box 16 on the LSGAC form. The proposed Monopine is not categorically excluded since the lowest point of the microwave dish is approximately proposed at 28'6" AGL (which is less than 10 meters AGL).

Section 3.10-3.13: Incomplete. Applicant has left this section blank.

Section 5.00: Incomplete. Applicant has left the entirety of this section blank.

Section 6.02-6.04: Incomplete. The Applicant needs to provide maps with objective RF levels as required within the STIR. This is necessary to allow the City to perform its time, place, and manner reviews pursuant to California Public Utilities Code §§ 7901, 7901.1.

Section 8.00: Incomplete. Applicant has left the entirety of this section blank.

Section 9.00: Incomplete. Applicant has left the entirety of this section blank.

Submittal Requirements for Wireless Telecommunication Facilities Form:

Electronic Copies: Incomplete. Applicant has failed to submit one CD or USB Drive of the required documents.

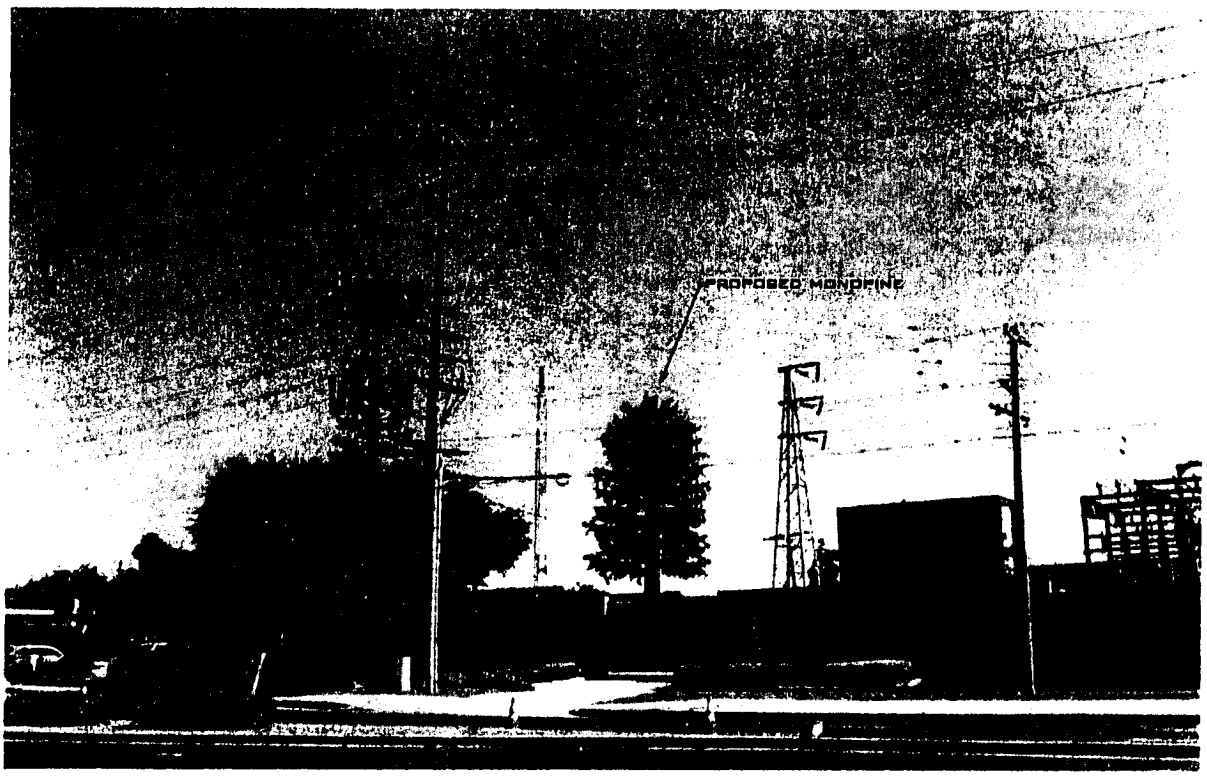
Fees: Incomplete. The Applicant has failed to submit a $481 notification fee payment.

/JLK

Telecom Law Firm PC

Alternative Candidate Analysis

Verizon Wireless
"Patronella"
21760 Madrona Avenue, Torrance, CA 90503



2/22/2021

Summary of Site Evaluations
Conducted by: Delta Groups Engineering

ATTACHMENT 4

I. Summary

In March of 2015, it became necessary for Verizon Wireless to pursue a new wireless facility in the City of Torrance. Due to heavy demand for wireless voice and data, along with increased usage, the community requires a greater coverage area and increased capacity to accommodate their needs. The significant gap in coverage/capacity existing in Torrance, CA is currently being served by Verizon sites "Gramercy," "Prairie" and "Dudmore". The proposed "Patronella" site will help address the significant coverage gap for the Central Torrance area as well as offload the previously mentioned "Gramercy," "Prairie" and "Dudmore" sites. The significant gap in coverage/capacity includes the dense residential areas surrounding the proposed facility. As a result, Verizon Wireless is proposing a new facility at 21760 Madrona Avenue, Torrance, CA 90503. As an SCE Substation property with existing wireless facilities and multiple carriers, as well as tall SCE utility structures, it is the most compatible and least intrusive site which meets the code requirements of the Torrance Municipal Code while also meeting the coverage and capacity needs of the citizens and emergency service providers in the area.

On February 10, 2021, a revisit to the area was conducted by Delta Groups Engineering to confirm that no new alternative candidates could be found and that the alternative sites looked at in 2016 remain unchanged. Based on the revisit, it was determined that the SCE Substation currently proposed by Verizon Wireless is still the most compatible and least intrusive site location and design that meets RF coverage objectives.

II. Coverage/Capacity Gap

Verizon Wireless Performance Engineers have determined that there is a significant gap in coverage and capacity in the Torrance, CA area. The gap includes residential areas north and south W. Carson Street centered between Flower Avenue and Fern Avenue. This gap in coverage is visually represented in the propagation map exhibits included with this submittal, specifically in the view labelled "Verizon Coverage without Patronella." The objective for the "Patronella" site is to enhance coverage along W. Carson Street and its surrounding residential communities as well as offload existing Verizon sites "Gramercy," "Prairie," and "Dudmore." It will improve coverage in the surrounding area by providing sufficient capacity for calls and data transmissions, ensuring reliability of cellular signal.

III. Methodology

Once a significant gap in coverage/capacity is determined, Verizon Wireless seeks to identify a site that will provide a solution through the "least intrusive means" based upon Verizon Wireless' experience with designing similar facilities and working within local regulations. In addition to seeking the least intrusive alternative, sites proposed by Verizon Wireless must be feasible from a construction and signal propagation standpoint. In this regard, Verizon Wireless reviews the surrounding topography, radio frequency propagation, elevations, height, available electrical, telco, and fiber utilities, access, and other critical factors such as a willing landlord in completing its site analysis.

IV. Analysis

For the past 4 years, Verizon Wireless has sought to identify a suitable location for its wireless facility to serve the City of Torrance and address a significant gap. As co-location of facilities are preferred per city code, Verizon Wireless sought a site that could also provide necessary radio frequency propagation to address the significant gap in coverage and capacity gap currently existing in the search area.

Section 92.39.010 of the City's Municipal Code states that the regulations included are to "1) Encourage the location of antennas in non-residential areas, 2) Strongly encourage co-location at new and existing antenna sites, 3) Encourage telecom facilities to be located in areas where adverse impacts on the community and public views are minimized." The proposed location at 21760 Madrona Avenue meets all of these objectives. The proposed site is located in a commercial area, with the subject site being zoned C2 (General Commercial). In addition, the facility is proposed to collocate on an existing antenna site as further defined in Section 92.39.030(f). There are existing carriers located on property at this SCE substation, along with the precedence of this being a property for utility infrastructure. Lastly, the proposed facility will be on property designated for utility use and setback from all major roads, Carson St., Madrona Ave. and Plaza del Amo. Therefore, the proposed location meets all three objectives of Section 92.39.010.

Section 92.39.010(b)(1) lists location priorities with subsection (A) existing co-location site being the most preferred. The Verizon facility is proposed to be co-located on site as most preferred and be camouflaged as a monopine per subsection (E), which blends with the surrounding mature trees and matches the precedence set by the existing facility on site. The proposed monopine will be shorter and more densely branched the adjacent monopine on the SCE utility property. While designed as a faux tree, the facility is co-located which is a higher priority location preferred by Section 92.39.010(b)(1)(A) and therefore again meets the intent of Article 39 - Wireless Telecommunications Facilities section of the City's Municipal Code.

Section 92.39.040(d)(2) states that no more than three telecom facilities may co-locate at a single site. Verizon reached out to AT&T who is currently on the existing monopine and has a COW (cell on wheels) for their First Net services adjacent. Verizon received confirmation on 2/18/21 that AT&T will at some point in the months down the road be removing the COW and decommissioning all the COW equipment on this property. Therefore, Verizon would only be the third co-locator and only the second pole. Again meeting the requirements in the City's Municipal Code.

Lastly, per Section 92.39.050(a) and (b) the proposed Verizon facility will blend into the surrounding environment given that it is setback from the public right-of-way behind existing mature trees and utility infrastructure. Additionally those same trees and infrastructure will provide screening of the proposed monopine. The size of the monopine is shorter than the existing

monopine and utility poles located adjacent. The facility will be visually compatible with surrounding buildings (existing utility infrastructure) and vegetation.

Figure 1: Map of Alternative Candidates Considered – Red Circle Indicates RF Search Ring Provided

The following is a summary of sites identified and submitted to Verizon Wireless RF Engineers within the search ring area:

Candidate Name	Property Address	Property Owner/ Contact	Property Owner Interest	RF Approval	Additional Zoning Notes
Collocation on existing Monopine in Edison yard	21760 Madrona Avenue APN: 7359-024-803, 802	Southern California Edison Contact: Phil Hickerson 626-695-5888	Yes	Yes	Original proposed design was to collocate on the existing AT&T monopine; however, Verizon's antennas would be too low to meet the radio frequency coverage objectives. This is the ideal candidate given that it meets the requirements in the City's municipal code as listed above; especially given that co-location on a site is the most preferred locational objective per Section 92.39.010.
Torrance First Presbyterian Church Education Building	1880 Crenshaw Blvd., Torrance, CA APN: 7359-010-008	Torrance First Presbyterian Contact: Billy Song (Pastor) Phone: 310-618-2222	No	Yes	Limited ground space—would require roof mounted antennas and equipment, possibly in parking structure. Unable to obtain property owner interest to lease. Revisited the property on 2/10/2021, no visible changes to the property.

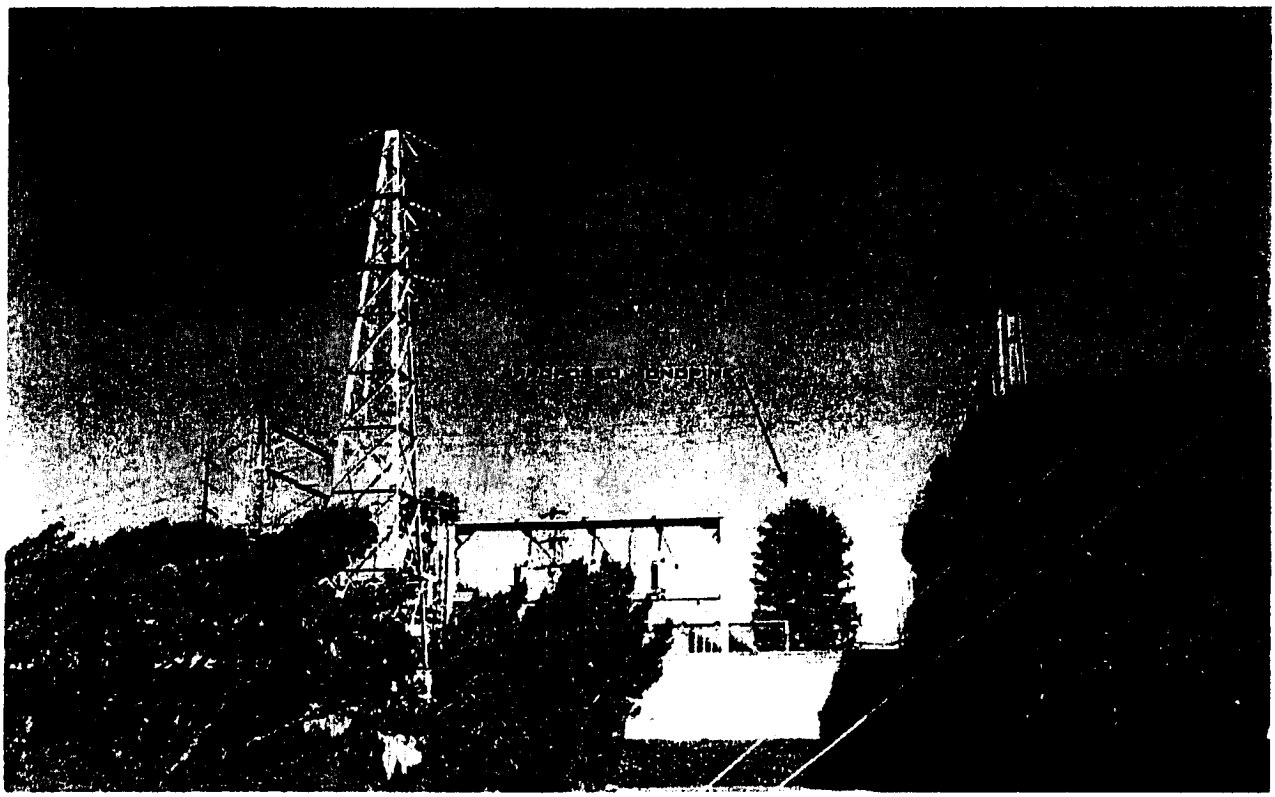
Candidate Name	Property Address	Property Owner/ Contact	Property Owner Interest	RF Approval	Additional Zoning Notes
Torrance First Presbyterian Church	1900 Crenshaw Blvd., Torrance, CA APN: 7359-010-012	Torrance First Presbyterian Contact: Billy Song (Pastor) Phone: 310-618-2222	No	Yes	Roof mounted equipment, equipment on roof, or at rear of building in parking lot. Unable to obtain property owner interest to lease. Revisited the property on 2/10/2021, no visible changes to the property.
Public Storage	1720 Crenshaw Blvd, Torrance, CA APN: 7359-008-034	Diversified Storage Fund II Phone: 424-260-5208	Yes	No	Site location not approved by the Verizon RF Engineer as it would not meet coverage objectives. Revisited the property on 2/10/2021, no visible changes to the property.
Office Building	2420 W. Carson St, Torrance, CA APN: 7359-039-002	The Greene Family, LLC Contact: Greene Development 310-212-5960	N/A	N/A	Property was determined to have insufficient space at grade for a free-standing tower. Additionally, the building height is insufficient for roof-mounted antennas to achieve RF objectives. Revisited the property on 2/10/2021, no visible changes to the property.
Medical Building	3440 W. Carson St., Torrance, CA APN: 7366-019-022	Peregrine Medical Building LLC Contact: Dennis Dylan Phone: 310-258-0444	N/A	No	Candidate was not pursued due to a blocked line of sight caused by the One West Bank building immediately to the east of the building. Would not meet RF coverage objectives. Revisited the property on 2/10/2021, no visible changes to the property. Additionally, this property would not meet section 92.39.040(d)(1) of the City's Municipal Code as it is within 1,000 feet of an existing facility which per code requires Verizon to Co-locate on the same site as the existing facility which Verizon's project proposes to do.
One West Bank	3424 W. Carson St., Torrance, CA APN: 7366-019-023	Ouye Gary Tr; Commonwealth Plaza, LLC	No	No	Unable to obtain property owner interest to lease. Revisited the property on 2/10/2021, no visible changes to the property. Additionally, this property would not meet section 92.39.040(d)(1) of the City's Municipal Code as it is within 1,000 feet of an existing facility which per code requires Verizon to Co-locate on the same site as the existing facility which Verizon's project proposes to do.

Candidate Name	Property Address	Property Owner/ Contact	Property Owner Interest	RF Approval	Additional Zoning Notes
First Evangelical Lutheran Church and School	2900 W. Carson St., Torrance, CA APN: 7359-023-038	First Evangelical Lutheran Church Torrance Contact: Bill Hurst (Pastor) 310-320-9920	No	No	Unable to obtain property owner interest to lease. RF Engineer did not approve location for a site. Revisited property on 2/10/2021. No visible changes to the property.
Vacant Commercial Land/ Parking	21515 Madrona Avenue, Torrance, CA APN: 7366-019-023	Madrona F&F LLC Contact: Farajolla F. Majoor 310-214-1491	No	Yes	Unable to obtain property owner interest to lease due to future planned development of the land as confirmed by the property owner. Revisited the property on 2/10/2021, property appears to be in redevelopment.
Greenwood Park	1520 Greenwood Avenue, Torrance, CA APN: 7362-025-900	City of Torrance 310-328-5310	No	Yes	Conducted a site walk with City officials, but the City rejected Verizon's proposal due to siting concerns and proximity to the neighboring school. Revisited the property on 2/10/2021, no visible changes to the property.
General Office Building	3480 Torrance Blvd, Torrance, CA APN: 7366-019-0333	Muller South Bay East LLC Contact: Eric Lastition 310-491-2000	No	No	Unable to obtain property owner interest to lease. Property owner confirmed that they are not interested in leasing to Verizon as they recently redeveloped the property. Additionally, the tall trees surrounding the building may present RF interference concerns. Revisited the property on 2/10/2021, no visible changes to the property.
Sepulveda Tower	3501 Sepulveda Blvd, Torrance, CA APN:7366-019-132	Fourth Searsvale Prop. Inc Lessor: Hudson Del Amo Office Sublessee – Chris Sinfield 310-525-1921	No	Yes	Unable to obtain property owner interest to lease. Property owner confirmed they are not interested in leasing to Verizon. Revisited the property on 2/10/2021, no visible changes to the property.

Candidate Name	Property Address	Property Owner/ Contact	Property Owner Interest	RF Approval	Additional Zoning Notes
Lattice Tower	3141 Torrance Blvd., Torrance, CA	City of Torrance 310-328-5310	N/A	Yes	The Verizon RF Engineer was interested in this candidate; however there was no direct access to the site from the public right of way.
Madrona Marsh Preserve	3201 Plaza del Amo, Torrance, CA	City of Torrance 310-328-5310	N/A	Yes	This candidate is outside the original radio frequency search ring, as is our proposed location. At the City's request, Verizon visited the property to assess siting viability. It was determined at the visit that the Visitor's Center building is far too low for a rooftop build to meet RF coverage objectives. Locating a new ground facility at this location would require some type of faux tree, which ranks lower in section 92.39.040(b) versus the proposed Verizon location at the SCE substation which is a co-location site. In addition, per section 92.39.050(1) and (2), a new faux facility here would not blend into the environment and would be extremely visible from the public right-of-way on Plaza del Amo and Monterey Street. Additionally, given this is a marsh construction may be challenging, if not, infeasible due to the nature of the land and therefore the only potentially viable areas would be the landscaped area to the north of the Visitor's Center or a location within the parking lot, likely necessitating the removal of 2 or more parking spaces. Both of these locations would be much closer and have a larger impact on residential properties than the Verizon proposed project which is not preferred given Section 92.39.010(a)(1) of the City's Municipal Code. Lastly, this property would not meet section 92.39.040(d)(1) of the City's Municipal Code as it is within 1,000 feet of an existing facility which per code requires Verizon to Co-locate on the same site as the existing facility which Verizon's project proposes to do.
Fortune Textiles and Clothing	2730 Monterey Street, Torrance, CA	Twenty Seven 20 Monterey Street	No	Yes	Site was approved by the Verizon RF Engineer but following a site visit, the property owner advised that he did not want to enter into a long term lease with Verizon as they want to redevelop the property for residential use in the future.

V. Proposed Location

21760 Madrona Avenue, Torrance, CA 90503
Site Type: Monopine
Height: 49'-6"
Zoning: C-2 General Commercial



This site was chosen for the following reasons:

- The proposed site location and obtainable height meet the RF objectives to help close the significant gap in this area of Torrance, enhancing coverage along W. Carson Street, Madrona Ave. and Sepulveda Blvd., as well as, the surrounding commercial and residential communities. In addition, the site will help increase capacity of the existing Verizon Wireless sites "Gramercy," "Prairie," and "Dudmore".
- The site is feasible from a construction standpoint.
- The site conforms to the City of Torrance Zoning Code, Section 92.39 as stated above in Section IV Analysis. It meets all design requirements and is proposed in the most preferred location as it is on a nonresidential property, co-located and setback behind existing infrastructure and mature trees where it will blend and views will be minimized.
- This site also is in line with General Plan Section 4.4.2 which recognizes that telecommunications systems are essential to perform most of our day-to-day activities.

- The proposed location is the least intrusive siting option as it is a site co-location and locating on a property specifically developed for utilities.
- Verizon Wireless was able to confirm landlord interest to lease.

Conclusion

Verizon Wireless evaluated multiple siting alternatives within the identified significant gap in coverage/capacity over the last 4 years. Based on this analysis, Verizon Wireless concludes that the proposed "Patronella" site, located at the SCE Substation at 21760 Madrona Avenue, Torrance, CA is the least intrusive and most compatible means to address the significant gap in coverage/capacity and address the community's wireless needs. It is also the most viable candidate that meets Verizon Wireless's coverage objectives with minimal visual impacts and is therefore preferred under the City of Torrance Municipal Code.

City of Torrance, Community Development Department Danny Santana, Director
3031 Torrance Blvd., Torrance, CA 90503, Phone (310) 618-5990 Fax (310) 618-5829

SUPPLEMENTAL TECHNICAL INFORMATION REPORT FOR WIRELESS TELECOMMUNICATION FACILITIES

1.00: Project Address 21760 Madrona Avenue

Assessor Parcel Number 7359-024-903

2.00: Disclose the Name and Address of all Project Owners, and attach a letter of agency appointing the Applicant as representative of the Project Owners in connection with this application. Designate the letter of agency as "Attachment 2.00".

3.00: **FCC Licensee/FAA Compliance Information**

3.01: Identify each person or legal entity that will be using the wireless site and contact information (Attach additional sheets if necessary)

Name: Los Angeles SMSA Limited Partnership dba Verizon Wireless

Address: 15505 Sand Canyon Avenue Building D

City, State, Zip: Irvine CA 92618

Phone: 949-286-7000 Fax: _____

Email: _____

3.02: Attach a complete copy of each FCC license/FCC Construction Permit/FCC call sign for each person/legal entity that will be subject to the FCC license for the Project site. Designate the license(s)/Construction Permit(s) as "Attachment 3.02". If none of the proposed radio facilities require an FCC license so indicate on Attachment 3.02.

3.03: What is the intended use of the facility (check all that apply):

- __ Broadcast Radio
- __ Broadcast TV
- X Cellular telephone
- __ Enhanced Specialized Mobile Radio
- X Microwave
- __ PCS telephone
- __ Paging
- __ Specialized Mobile Radio
- __ Other: _____

3.04: Project latitude and longitude: N [illegible] W [illegible]

City of Torrance, Community Development Department Danny Santana, Director
3031 Torrance Blvd., Torrance, CA 90503, Phone (310) 618-5990 Fax (310) 618-5829

SUPPLEMENTAL TECHNICAL INFORMATION REPORT FOR WIRELESS TELECOMMUNICATION FACILITIES

3.05: Specify DATUM use above: ____ WGS84 ____ NAD23 X NAD83

3.06: Project Maximum height (ft): 49'6"

3.07: Bottom of lowest antenna (ft): 28'6" (microwave)

3.08: Rad-center of the antennas (ft): 40'6"

3.09: For each licensee, and for each radio service, complete and attach the two page "Appendix A" form from "A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance" available from the following website: http://www.FCC.gov/oet/rfsafety. Designate the completed two page form as "Attachment 3.09". Additional RF safety disclosure information may be required by the government to determine compliance with FCC OET 65 requirements if the site is not "categorically excluded" under OET 65.

3.10 Are any areas adjacent to the antennas subject to RF emissions that are in excess of the "General Public/uncontrolled" standard in FCC OET 65? For this purpose, assume that all persons other than the Carrier's technical staff are considered to be members of the General Public.
X Yes ____ No
(If the answer to 3.10 is NO proceed to 3.12)

3.11 Provide a detailed RF analysis for each emitter and each band showing the distance, in feet, in all directions to the boundary of the General Public/uncontrolled boundary. Designate this attachment, "Attachment 3.11".

3.12 Considering your response to 3.10, above, and any other identifiable RF emitters that OET 65 requires be evaluated in connection with this project, are <u>all</u> portions of this project cumulatively "categorically excluded" under FCC OET 65 requirements?
____ Yes X No
(If the answer to 3.12 is YES proceed to 3.14.)

3.13 Describe in an attachment each and every RF emitter of the project that is not "categorically excluded" under the FCC OET 65 requirements. Designate this attachment, "Attachment 3.13".

3.14: Does this project require the Applicant to file an FAA Form 7460 or other documentation under Federal Aviation Regulation Part 77.13 et seq, or under the FCC rules?
___ Yes X No
(If the answer to 3.14 is NO proceed to 4.00.)

3.15 Attach complete copies of all required FAA/FCC forms including all attachments and exhibits thereto, including without limitation FAA Form 7460. Designate this attachment, "Attachment 3.15".

4.00: **Project Purpose**

4.01: Justification. Provide a brief narrative, accompanied by written documentation where appropriate, which explains the purpose of the facility and validates the applicant's efforts to comply with the design, location, and co-location standards of Chapter 2, Division 9, Article 39 of the City's Municipal Code.

Please see attached

4.02: Indicate whether the dominant purpose of the Project is to add additional network capacity, to increase existing signal level, or to provide new radio frequency coverage (check only one).

X Add network capacity without adding substantial new RF coverage area (Proceed to 5.00)
__ Increase the existing RF signal level in an existing coverage area (Proceed to 5.00)
__ Provide new radio frequency coverage in a substantial area not already served by existing radio frequency coverage (Proceed to 5.00)
__ Other

4.03 Attach a statement fully and expansively describing the "Other" dominant purpose of this project. Designate this attachment, "Attachment 4.03".

5.00: **Build-Out Requirements**

5.01: Do any of radio services identified in 3.04 above require the licensee to provide specific radio frequency/population coverage pursuant to the underlying FCC license?
___ Yes X No
(If the answer to 5.01 is NO proceed to 6.00.)

5.02: Have all of the FCC build-out requirements as required by all licenses covering all radio services proposed at this Project been met?
X Yes ___ No
(If the answer to 5.02 is YES proceed to 6.00.)

5.03: State by licensee all remaining build-out requirements which have yet to be met, and the known or estimated date when the remaining build-out requirements will be met. Designate this attachment "Attachment 5.03".

6.00: **Radio Frequency Coverage Maps**

6.01: Where a licensee intends to provide radio frequency geographic coverage to a defined area from the Project (including applicants in the cellular, PCS, broadcast, ESMR/SMR categories, and others as requested by the City of Torrance), the coverage maps and information requested in Section 6 are required attachments. All others proceed to 7.00.

For the coverage maps required here, the following mandatory requirements apply. Failure to adhere to these requirements may delay your application processing.

1. The size of each submitted map must be no smaller than 11" by 8.5".

2. If the FCC rules for any proposed radio service defines a minimum radio frequency signal level that level must be shown on the map in a color easily distinguishable from the base paper or transparency layer, and adequately identified by RF level and map color or gradient in the map legend. If no minimum signal level is defined by the FCC rules you must indicate that in the legend of each RF coverage map. You may show other RF signal level(s) on the map so long as they are adequately identified by objective RF level and map color or gradient in the map legend.

3. Where the City of Torrance determines that one or more submitted maps are inadequate, it reserved the right to request that one or more supplemental maps with greater or different detail be submitted.

6.02: Existing RF coverage within the City of Torrance on the same network, if any (if none, so state). This map should not depict any RF coverage to be provided by the Project. Designate this attachment "Attachment 6.02".

6.03: RF coverage to be provided by the Project. This map should not depict any RF coverage provided any other existing or proposed wireless sites. Designate this attachment "Attachment 6.03".

6.04: RF coverage to be provided by the Project and by other wireless sites on the same network should the Project site be activated. Designate this attachment "Attachment 6.04".

6.05: Provide a written certification that the facility will continuously comply with FCC OET Bulletin 65 radio frequency emissions standards, and that use of the facility will not interfere with other communication, radio, or television transmission or reception.

7.00: **Project Photographs and Photo Simulations**

7.01: Where an Applicant proposes to construct or modify a wireless site, and the wireless site is visible from other residential properties, the Applicant shall submit pre-project photographs, and photo simulations showing the project after completion of construction, all consistent with the following standards:

1. Minimum size of each photo simulation must be 11 inches by 8.5 inches (portrait or landscape orientation);

2. All elements of the project as proposed by the Applicant must be shown in one or more close-in photo simulations.

3. The overall project as proposed by the Applicant must be shown in five or more area photos and photo simulations. Photos and photo simulation views must, at a minimum, be taken from widely scattered positions separated by an angle of no greater than 72 degrees from any other photo location.

The number of site photos, and photo simulations, and the actual or simulated camera location of these photos and photo simulations is subject to City of Torrance determination. The Applicant should submit photos and photo simulations consistent with these instructions, and be prepared to provide additional photos and photo simulations should they be requested by the City of Torrance.

8.00: **Candidate Sites**

8.01: For applicants in the cellular, PCS, broadcast, ESMR/SMR categories, and others as requested by the City of Torrance, the information requested in Section 8 is required. All others proceed to 9.00.

8.02: Has the Applicant or Owner or anyone working on behalf of the Applicant or Owner secured or attempted to secure any leases or lease-options or similar formal or informal agreements in connection with this project for any sites other than the candidate site identified at 1.00?
X Yes ___ No
(If the answer to 8.02 is NO, proceed to 8.04.) in alternatives analysis

8.03: Provide the physical address of each such other location, and provide an expansive technical explanation as to why each such other site was disfavored over the Project Site. Designate this attachment "Attachment 8.03". in alternatives analysis

8.04: Considering this proposed site, is it the one and only one location within or without the City of Torrance that can possibly meet the objectives of the project?
___ Yes X No
(If the answer to 8.04 is NO, proceed to 8.05.)

8.05: Provide a technically expansive and detailed explanation supported as required by comprehensive radio frequency data fully describing why the proposed site is the one and only one location within or without the City of Torrance that can possibly meet the radio frequency objectives of the project. Explain, in exact and expansive technical detail, all of the objectives of this project. Designate this attachment "Attachment 8.05".

9.00: **Identification of Key Persons**

9.01: Identify by name, title, company affiliation, work address, telephone number and extension, and email address the key person or persons most knowledgeable regarding:

(1) the site selection for the proposed project, including alternatives;
(2) the radio frequency engineering of the proposed project;
(3) rejection of other candidate sites evaluated, if any;
(4) approval of the selection of the proposed site identified in this project.
Designate this attachment "Attachment 9.01"

9.02 If more than one person is/was involved in any of the four functions identified in this section, attach a separate sheet providing the same information for each additional person, and identifying which function or functions are/were performed by each additional person. Designate this attachment "Attachment 9.02".

Initial here LD to indicate that the information above is complete and there is no Attachment 9.02, or initial here _____ to indicate that Attachment 9.02 is attached hereto.

10.00: **Technical Information Report Certification**

10.01: The undersigned certifies on behalf of itself and the Applicant that the answers provided here are true and complete to the best of the undersigned's knowledge.

Signature	Land Use Entitlement Title
Lisa Desmond Print Name	ldesmond@deltagroups.com Provide Email Address
Delta Groups Engg Print Company Name	951-244-0866 Provide Telephone Number
11/11/2019 Date Signed	

verizon✓

Date: October 9, 2019

RE: Verizon Wireless Site "**PATRONELLA**"
Site Located at: **21760 Madrona Ave. Torrance, CA 90503**

To Whom It May Concern,

We write to inform you that Verizon Wireless has performed a radio frequency (RF) compliance pre-construction evaluation for the above-noted proposed site and based on the result of the evaluation, will be compliant with FCC Guidelines.

The FCC has established safety guidelines relating to potential RF exposure from cell sites. The FCC developed the standards, known as Maximum Permissible Exposure (MPE) limits, in consultation with numerous other federal agencies, including the Environmental Protection Agency, the Food and Drug Administration, and the Occupational Safety and Health Administration. The FCC provides information about the safety of radio frequency (RF) emissions from cell towers on its website at: http://www.fcc.gov/oet/rfsafety/rf-faqs.html

Please refer to the FCC Office of Engineering and Technology Bulletin 65 for information on RF exposure guidelines. Policy questions should be directed to VZWRFCompliance@verizonwireless.com.

The facility will utilize licensed frequencies in the 700, 850, 1900 and 2100 MHz bands. Verizon Wireless' telecommunications equipment will not interfere with any frequencies used by emergency personnel in the frequency range of HF, UHF, VHF, 800 MHz or with any system operating outside of Verizon Wireless' FCC licensed frequency band or with.

Please contact your local Verizon Wireless resource below if you have additional site-specific questions.

Contact Name	Contact Email	Contact Phone
Steve Lamb	WestSoCalNetworkCompliance@VerizonWireless.com	949-243-4849

Sincerely,

Jeremy Lee
Manager-RF Design
Verizon Wireless

Federal Communications Commission

Wireless Telecommunications Bureau

RADIO STATION AUTHORIZATION

LICENSEE: CELLCO PARTNERSHIP

ATTN: REGULATORY
CELLCO PARTNERSHIP
5055 NORTH POINT PKWY, NP2NE NETWORK ENGINEERING
ALPHARETTA, GA 30022

Call Sign	File Number
WQPZ965	
Radio Service	
AW - AWS (1710-1755 MHz and 2110-2155 MHz)	

FCC Registration Number (FRN): 0003290673

Grant Date	Effective Date	Expiration Date	Print Date
08-23-2012	11-01-2016	11-29-2021	

Market Number	Channel Block	Sub-Market Designator
REA006	F	5

Market Name
West

1st Build-out Date	2nd Build-out Date	3rd Build-out Date	4th Build-out Date

Waivers/Conditions:

This authorization is conditioned upon the licensee, prior to initiating operations from any base or fixed station, making reasonable efforts to coordinate frequency usage with known co-channel and adjacent channel incumbent federal users operating in the 1710-1755 MHz band whose facilities could be affected by the proposed operations. See, e.g., FCC and NTIA Coordination Procedures in the 1710-1755 MHz Band, Public Notice, FCC 06-50, WTB Docket No. 02-353, rel. April 20, 2006.

Conditions:
Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. § 310(d). This license is subject in terms to the right of use or control conferred by §706 of the Communications Act of 1934, as amended. See 47 U.S.C. §606.

This license may not authorize operation throughout the entire geographic area or spectrum identified on the hardcopy version. To view the specific geographic area and spectrum authorized by this license, refer to the Spectrum and Market Area information under the Market Tab of the license record in the Universal Licensing System (ULS). To view the license record, go to the ULS homepage at http://wireless.fcc.gov/uls/index.htm?job=home and select "License Search". Follow the instructions on how to search for license information.

Licensee Name: CELLCO PARTNERSHIP

Call Sign: WQPZ965 **File Number:** **Print Date:**

The license is subject to compliance with the provisions of the January 12, 2001 Agreement between Deutsche Telekom AG, VoiceStream Wireless Corporation, VoiceStream Wireless Holding Corporation and the Department of Justice (DOJ) and the Federal Bureau of Investigation (FBI), which addresses national security, law enforcement, and public safety issues of the FBI and the DOJ regarding the authority granted by this license. Nothing in the Agreement is intended to limit any obligation imposed by Federal lawor regulation including, but not limited to, 47 U.S.C. Section 222(a) and (c)(1) and the FCC's implementing regulations. The Agreement is published at VoiceStream-DT Order, IB Docket No. 00-187, FCC 01-142, 16 FCC Rcd 9779, 9853 (2001).

AWS operations must not cause harmful interference across the Canadian or Mexican Border. The authority granted herein is subject to future international agreements with Canada or Mexico, as applicable.

Licensee Name: CELLCO PARTNERSHIP

Call Sign: WQPZ965 **File Number:** **Print Date:**

700 MHz Relicensed Area Information:

Market	Market Name	Buildout Deadline	Buildout Notification	Status

Federal Communications Commission

Wireless Telecommunications Bureau

RADIO STATION AUTHORIZATION

LICENSEE: LOS ANGELES SMSA LIMITED PARTNERSHIP

ATTN: REGULATORY
LOS ANGELES SMSA LIMITED PARTNERSHIP
5055 NORTH POINT PKWY, NP2NE NETWORK ENGINEERING
ALPHARETTA, GA 30022

Call Sign	File Number
WPWH653	0007638763
Radio Service	
CW - PCS Broadband	

FCC Registration Number (FRN): 0002963817

Grant Date	Effective Date	Expiration Date	Print Date
03-31-2017	03-31-2017	04-28-2027	04-01-2017

Market Number	Channel Block	Sub-Market Designator
BTA262	E	2

Market Name
Los Angeles, CA

1st Build-out Date	2nd Build-out Date	3rd Build-out Date	4th Build-out Date
04-28-2002			

Waivers/Conditions:

This authorization is subject to the condition that, in the event that systems using the same frequencies as granted herein are authorized in an adjacent foreign territory (Canada/United States), future coordination of any base station transmitters within 72 km (45 miles) of the United States/Canada border shall be required to eliminate any harmful interference to operations in the adjacent foreign territory and to ensure continuance of equal access to the frequencies by both countries.

License renewal granted on a conditional basis, subject to the outcome of FCC proceeding WT Docket No. 10-112 (see FCC 10-86, paras. 113 and 126).

Conditions:
Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. § 310(d). This license is subject in terms to the right of use or control conferred by §706 of the Communications Act of 1934, as amended. See 47 U.S.C. §606.

This license may not authorize operation throughout the entire geographic area or spectrum identified on the hardcopy version. To view the specific geographic area and spectrum authorized by this license, refer to the Spectrum and Market Area information under the Market Tab of the license record in the Universal Licensing System (ULS). To view the license record, go to the ULS homepage at http://wireless.fcc.gov/uls/index.htm?job=home and select "License Search". Follow the instructions on how to search for license information.

This authorization is subject to the condition that the remaining balance of the winning bid amount will be paid in accordance with Part 1 of the Commission's rules, 47 C.F.R. Part 1.

Federal Communications Commission

Wireless Telecommunications Bureau

RADIO STATION AUTHORIZATION

LICENSEE: AIRTOUCH CELLULAR

ATTN: REGULATORY
AIRTOUCH CELLULAR
5055 NORTH POINT PKWY, NP2NE NETWORK ENGINEERING
ALPHARETTA, GA 30022

Call Sign	File Number
KNLF889	0007638414
Radio Service	
CW - PCS Broadband	

FCC Registration Number (FRN): 0006146468

Grant Date	Effective Date	Expiration Date	Print Date
03-30-2017	03-30-2017	04-28-2027	03-31-2017

Market Number	Channel Block	Sub-Market Designator
BTA262	F	0

Market Name
Los Angeles, CA

1st Build-out Date	2nd Build-out Date	3rd Build-out Date	4th Build-out Date
04-28-2002			

Waivers/Conditions:

This authorization is subject to the condition that, in the event that systems using the same frequencies as granted herein are authorized in an adjacent foreign territory (Canada/United States), future coordination of any base station transmitters within 72 km (45 miles) of the United States/Canada border shall be required to eliminate any harmful interference to operations in the adjacent foreign territory and to ensure continuance of equal access to the frequencies by both countries.

This authorization is conditioned upon the full and timely payment of all monies due pursuant to Sections 1.2110 and 24.716 of the Commission's Rules and the terms of the Commission's installment plan as set forth in the Note and Security Agreement executed by the licensee. Failure to comply with this condition will result in the automatic cancellation of this authorization.

Conditions:
Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. § 310(d). This license is subject in terms to the right of use or control conferred by §706 of the Communications Act of 1934, as amended. See 47 U.S.C. §606.

This license may not authorize operation throughout the entire geographic area or spectrum identified on the hardcopy version. To view the specific geographic area and spectrum authorized by this license, refer to the Spectrum and Market Area information under the Market Tab of the license record in the Universal Licensing System (ULS). To view the license record, go to the ULS homepage at http://wireless.fcc.gov/uls/index.htm?job=home and select "License Search". Follow the instructions on how to search for license information.

Licensee Name: AIRTOUCH CELLULAR

Call Sign: KNLF889 **File Number:** 0007638414 **Print Date:** 03-31-2017

Grant of the request to update licensee name is conditioned on it not reflecting an assignment or transfer of control (see Rule 1.948); if an assignment or transfer occurred without proper notification or FCC approval, the grant is void and the station is licensed under the prior name.

License renewal granted on a conditional basis, subject to the outcome of FCC proceeding WT Docket No. 10-112 (see FCC 10-86, paras. 113 and 126).

Licensee Name: AIRTOUCH CELLULAR

Call Sign: KNLF889 **File Number:** 0007638414 **Print Date:** 03-31-2017

700 MHz Relicensed Area Information:

Market	Market Name	Buildout Deadline	Buildout Notification	Status

Optional Local Government Checklist (page 2)

EVALUATION OF CATEGORICAL EXCLUSION

12. Licensed Radio Service (see attached Table 1): Cellular Radiotelephone Services
13. Structure Type (free-standing or building/roof-mounted): Free - Standing
14. Antenna Type [omnidirectional or directional (includes sectored)]: Directional
15. Height above ground of the lowest point of the antenna (in meters): 11.13
16. ☒ Check if all of the following are true:
    (a) This facility will be operated in the Multipoint Distribution Service, Paging and Radiotelephone Service, Cellular Radiotelephone Service, Narrowband or Broadband Personal Communications Service, Private Land Mobile Radio Services Paging Operations, Private Land Mobile Radio Service Specialized Mobile Radio, Local Multipoint Distribution Service, or service regulated under Part 74, Subpart I (see question 12).
    (b) This facility will not be mounted on a building (see question 13).
    (c) The lowest point of the antenna will be at least 10 meters above the ground (see question 15).

If box 16 is checked, this facility is categorically excluded and is unlikely to cause exposure in excess of the FCC's guidelines. The remainder of the checklist need not be completed. If box 16 is not checked, continue to question 17.

17. Enter the power threshold for categorical exclusion for this service from the attached Table 1 in watts ERP or EIRP* (note: EIRP = (1.64) X ERP): _____
18. Enter the total number of channels if this will be an omnidirectional antenna, or the maximum number of channels in any sector if this will be a sectored antenna:
19. Enter the ERP or EIRP per channel (using the same units as in question 17): _____
20. Multiply answer 18 by answer 19: _____
21. Is the answer to question 20 less than or equal to the value from question 17 (yes or no)?

If the answer to question 21 is YES, this facility is categorically excluded. It is unlikely to cause exposure in excess of the FCC's guidelines.

If the answer to question 21 is NO, this facility is not categorically excluded. Further investigation may be appropriate to verify whether the facility may cause exposure in excess of the FCC's guidelines.

*"ERP" means "effective radiated power" and "EIRP" means "effective isotropic radiated power

Project Description Narrative and Findings
Application for a Conditional Use Permit- Wireless
City of Torrance

Verizon Wireless is a registered public utility licensed and regulated by the Public Utilities Commission (PUC) and the Federal Communications Commission. As a public company, Verizon Wireless receives a license from the FCC to provide Wireless Communication Services throughout the United States. With current efforts underway to establish the required infrastructure for its network in the City of Torrance, Verizon Wireless has retained the services of Delta Groups Engineering to facilitate the land use entitlement process. On behalf of Verizon, Delta Groups is submitting an application to the City, and requesting approval of a conditional use permit for the construction and operation of an unmanned wireless telecommunications facility. To this end we present the following project information for your consideration:

Project Information

Verizon Wireless Project Name: **Patronella**
Address: 21760 Madrona Avenue
APN: 7359-024-803
Zoning: C2 General Commercial
Use: SCE Substation

Project Description

Verizon Wireless proposes to construct and operate an unmanned wireless facility to be designed as a monopine (faux pine tree). Twelve (12) panel antennas with an antenna centerline of 40'-6", twelve (12) RRUs, three (3) Raycap surge arrester units and one (1) GPS , three (3) equipment cabinets and associated equipment will be located within a 43' X 29' 9" lease area surrounded by a chain link fence.

Maintenance and Monitoring

The facility is unmanned and operates 24 hours a day, 7 days a week. Since the facility is unmanned, it will not generate any traffic or impact traffic circulation. The facility is connected to a central network operations center that monitors the facility's status. Routine maintenance occurs once every 4-6 weeks to ensure the equipment is operating within normal specifications. Should an emergency arise, maintenance crews are dispatched as necessary to correct the situation. The facility will not create any hazardous materials, waste, odor, light or glare.

Property Characteristics

The subject property is zoned C2- Commercial. It is currently developed as a SCE substation. The parcel is surrounded by retaining pond to the west, commercial to the north, multifamily to the east and open space to the south. There are no known scenic aspects of this site and no known adverse soils conditions. There are no known protected species of plants or animals on site.

Project Objective

Wireless carriers deploy new wireless facilities in a specific area to achieve one of the following:

- Provide signal coverage of sufficient strength to achieve consistent, sustainable, and reliable service to customers at a level sufficient for outdoor, in-vehicle, and in-building penetration with good voice and data quality during high demand periods.
- Provide additional system capacity to ensure there is sufficient signal capacity to offset the contraction of signal experienced when nearby sites become overloaded and more enhanced voice and data services are used (4G and other high speed data services) thereby creating periodic gaps. With heavy use this contraction of signal is intensified due to the unique properties of digital radio transmissions.

In this specific case Verizon's radio frequency (RF) engineers observed that the existing/surrounding Verizon sites are becoming overloaded beyond their capacity and that there are areas with little to no coverage. and determined that an additional facility is needed in order to relieve network traffic congestion and ensure reliable levels of service. This site will provide coverage for the Central Torrance area as well as deload sites "Gramercy", "Prairie" and "Dudmore", which are currently overloaded resulting in weak and unreliable coverage for residents and business owners in this area. The deployment of the proposed site will provide a significant improvement over the existing conditions.

Propagation maps have been provided to illustrate this issue within the network. Propagation maps provide important information regarding the level of the signal and therefore the anticipated coverage provided by a cell site. For a cellular system to work properly, each cell site must provide areas of discrete coverage as well as overlapping coverage with neighboring sites. Coverage exists when there is sufficient radio frequency ("RF") signal strength to provide safe, effective and reliable levels of coverage in a particular geographic area. As user travels between the discrete coverage areas of two or more sites, a handoff is triggered within the zone of overlapping coverage. If the handoff is successful, it is transparent to the user and results in seamless coverage. If the handoff is not successful, the call is lost and must be reestablished once the user gets within range of the next site. A gap in coverage therefore is when there is either no service within the area at all, or when the existing sites are at or near capacity making the network unable to satisfy demand for services places on the network by network users.
Without adequate RF signal, there is no reliability in the ability to make or receive voice calls, and data throughput speed is limited. This is especially significant in that Verizon Wireless, as an FCC licensee, is mandated to provide enhanced 911 services to its users. The strength of RF signal coverage is measured in decibel level and is noted as a dBm level. As decibel level is degraded (i.e. signal level is weakened), it is reflected in increasingly larger negative numbers. Hence, -75dBM is a stronger signal than -85dBM, which in turn is stronger than -95dBM.

The proposed facility will provide an integral link in Verizon's Wireless' proposed network and is designed to improve the network, by resolving current capacity issues of existing/surrounding facilities. Since the currently deployed facilities are operating beyond their capacity, and handling such a high demand for calls, data, etc., LTE speeds are slower than they should be, calls are getting dropped, and other issues affecting the network's performance are also occurring in this area of Torrance. The proposed site will provide reliable wireless telecommunications services to Verizon customers throughout the community.

Siting Analysis

The network of Verizon Wireless sites throughout the region is "locationally" dependent, meaning that there is a necessary and logical interrelationship between each site. Eliminating or relocating a single cell site can lead to gaps in the system and prohibit Verizon from providing uninterrupted services to customers in a defined coverage area.
Customer demand drives the need for new cell sites. Data relating to incomplete and dropped calls is gathered, drive-tests are conducted, and scientific modeling using sophisticated software is evaluated. Once the area requiring a new site is identified, a target/search ring on a map is provided to a real estate professional to begin a search for a suitable location.

During an initial reconnaissance, properties considered for the installation of a cell site must be located in the general vicinity of the ring, with an appropriate zoning designation, and appearing to have enough space to accommodate an antenna structure and the supporting radio equipment. The size of the space will vary depending on the objective of the site. The owners of each prospective location are notified to assess their interest in partnering with Verizon Wireless.

Four key elements are considered in the selection process:

- Leasing: The property must have an owner who is willing to enter into a long-term lease agreement under very specific terms and conditions.
- Zoning: It must be suitably zoned in accordance with local land use codes to allow for a successful permitting process.
- Construction: Construction constraints and costs must be reasonable from a business perspective, must be feasible for the proposed project to be constructed in accordance with local building codes and safety standards.
- RF: The property and facility must strategically be located to be able to achieve the RF engineer's objective to close the significant gap in coverage with antennas at a height to clear nearby obstructions.

Co-Location Information

Verizon Wireless always pursues co-location opportunities as a priority. If any potential existing facilities are identified, Verizon Wireless will contact the existing carrier to pursue co-location opportunities. There were no viable existing wireless facilities within the search ring area on which we could located this facility. There is also an LARICS temporary facility on this property. This site is located on a property that has an existing wireless facility, thereby eliminating the need to use a second property to fulfill the infrastructure.

Compatibility with the Torrance Development Standards

The proposed facility will conform to the following Torrance development standards and guidelines (Section 92.39.050 Municipal Code):

a. General Wireless Communications Facilities Standards

In addition to other design standards of this Section, the following criteria shall be considered by the reviewing authority in the connection of any telecom permit.

1. Blending. The extent to which the proposed facility blends into the surrounding environment or is architecturally integrated into a structure,
   The project is a located on a property that has an existing wireless facility and is designed as a monopine so that it will blend in with the surrounding trees and the existing monopine.

2. Screening. The extent to which the proposed facility is concealed, screened or camouflaged by existing or proposed topography, vegetation, building, or other structures
   The proposed project is a monopine, a faux pine tree. The antennas will be concealed with the faux branches of the monopine. The Monopine is designed to blend in with the existing monopine and the existing trees.

3. Size. The total size of the proposed facility, particularly in relation to surrounding and supporting structures.
   The proposed site has been designed to the smallest proportion needed. The antennas will be located on an existing structure.

D. Noise Standards

1. All wireless communications facilities and accessory wireless facility equipment shall comply with the applicable provisions of the City's noise ordinance.

   The facility will meet the provisions of the noise ordinance.

1. **Development Guidelines. Public wireless communication facilities should conform to the following development guidelines unless the approving authority determines, at its discretion, that sufficient justification exists to the contrary.**

   1. Co-located with other public wireless communication facilities.
      While this site is not a co-location on the same pole, the proposed site has an existing monopine eliminating the need to put the monopine on a second property.

   5. In commercial zoning districts
      The proposed site is on a C2 General Commercial Zone.

   6. No antenna or facility should be located within 500 feet from a lot containing a residential structure or a lot zoned for residential use unless a conditional use permit is approved. Co-located facilities shall be subject to a minor use permit.

   The proposed will be located on a the same property as the previously approved wireless telecommunication facility.

   7. Ground mounted facilities should be located only in close proximity to existing above ground utilities, such as electrical towers or utility poles (which are not scheduled for removal or undergrounding in the next eighteen months, light poles, trees of comparable heights, water tanks and in areas where they will not detract from the image of the City.

   The ground mounted facilities will be located adjacent the previously approved wireless telecommunication lease area.

   8. Major public wireless communications facilities are encouraged to locate beyond five hundred feet of any existing, legally established major public or private wireless communication facility except when co-located on the same building or structure.

   The proposed facility is located adjacent to an existing monopine structure on the same property.

   9. Applicants proposing new wireless telecommunication facilities must demonstrate that reasonable efforts have been made to locate on existing facilities. The applicant must provide written documentation of all efforts to co-locate the proposed facility on an existing facility, or antenna-mounting structure, including copies of letters or other correspondence sent to other carriers or tower owners requesting such location and any responses received, This should include information on lack of existing towers in the area, topography, frequency or signal interference, line of site problems and available land zoning restrictions as applicable.

Co-location is always the first option when searching for a new location for a wireless telecommunication facility, providing that it fits the needs of the RF engineer. The proposed facility is located adjacent to an existing wireless facility.

1. **All new wireless communications facilities shall be designed to accommodate co-location, when feasible.**

The proposed site is a co-location. Verizon is always willing to allow co-locations when feasible.

2. **In order to encourage co-location of wireless telecommunication facilities and maintain community aesthetics, applicants for conditional use permit or to install a tower or antenna mounting structure at the time of original application submittal may request subsequent applicants to be co-located on the same facility**

   Verizon is always willing to allow co-locations when feasible.

3. **Facilities that mimic building Architecture (church steeples, clock towers, tented windows, building treatments) in their immediate vicinity are encouraged.**

   This site is a located adacent to an existing monopine and is designed to mimic the existing .

Project Benefits

The proposed project will provide the following community benefits:

- Telephone, data transmission, paging, short message functions, voicemail services and reliable services for emergency purposes. According to an article release on May 4, 2017 the CDC National Center for Health Statistics of 2017 the United States more than 50% of all households are "wireless only" with no land line telephone service furthering the need for reliable cell service.
- Personal safety and security for community members in an emergency, or when there is an urgent need to reach family members or friends. Safety is the primary reason parents provide their children with cell phones.
- Enhanced emergency response communications for police, fire, paramedics and other emergency services.
- Enhanced 911 Services (E911)- The FCC mandates that all cell sites have location capability. Effective site geometry within the overall network is needed to achieve accurate location information for mobile users through triangulation with active cell sites (over half of all 911 calls are made using mobile phones).
- Better voice and reception quality.
- Higher security and privacy for telephone users.

Regulating Agencies:

Verizon Wireless is a registered public utility, licensed and regulated by the California Public Utilities Commission (CPUC) and the Federal Communications Commission (FCC). As a public utility, Verizon Wireless is licensed by the FCC, is authorized to operate, and must provide wireless communication services throughout the nation.

All of Verizon's sites comply with FCC regulations and requirements in regards to electro-magnetic emissions (EME). According to Section 704 of the 1996 Telecom Act, "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 emissions" (Section 704. (a) (II) (iv)).

Verizon Wireless' telecommunications facilities operate at the lowest possible power levels and are well below established standards used by the FCC for safe human exposure to radio frequency electromagnetic fields. These standards have been tested and proven safe by the American National Standards Institute and the Institute of Electrical and Electronics Engineers (IEEE). The proposed communications facility will operate in full compliance with the U.S. standards for radio frequency emissions as published by the American National Standards Institute (ANSI).

The development of this facility will further enhance Verizon's Southern California wireless network by allowing its customers reliable access to Verizon's nationwide network of services. Similar to the other existing wireless service providers, each Verizon Wireless communications facility, or base station, will consist of transmitting and receiving antennas mounted on a communication tower or other suitable structure. This specific proposed site will become an integral part of Verizon's wireless network.

The enclosed application and supporting materials are presented for your consideration. Verizon Wireless requests a favorable determination and approval of this application to construct the proposed facility. Please contact me at (951) 264-0866 or ldesmond@deltagroups.com for any questions or requests for additional information.

Respectfully submitted,

Optional Checklist for Local Government
To Determine Whether a Facility is Categorically Excluded

Purpose: The FCC has determined that many wireless facilities are unlikely to cause human exposures in excess of RF exposure guidelines. Operators of those facilities are exempt from routinely having to determine their compliance. These facilities are termed "categorically excluded." Section 1.1307(b)(1) of the Commission's rules defines those categorically excluded facilities. This checklist will assist state and local government agencies in identifying those wireless facilities that are categorically excluded, and thus are highly unlikely to cause exposure in excess of the FCC's guidelines. Provision of the information identified on this checklist may also assist FCC staff in evaluating any inquiry regarding a facility's compliance with the RF exposure guidelines.

BACKGROUND INFORMATION

1. Facility Operator's Legal Name: Los Angeles SMSA LP dba Verizon Wireless
2. Facility Operator's Mailing Address: 15505 Sand Canyon Ave Irvine 92618
3. Facility Operator's Contact Name/Title: Chandra Wijayaperta
4. Facility Operator's Office Telephone: 949-286-7200
5. Facility Operator's Fax: _____
6. Facility Name: _____
7. Facility Address: 27160 Madrina Ave
8. Facility City/Community: Torrance
9. Facility State and Zip Code: CA 90503
10. Latitude: 33° 49' 48.70"
11. Longitude: 118° 20' 39.61"

continue →

Optional Local Government Checklist (page 2)

EVALUATION OF CATEGORICAL EXCLUSION

12. Licensed Radio Service (see attached Table 1): Cellular Radiotelephone Services
13. Structure Type (free-standing or building/roof-mounted): Free - Standing
14. Antenna Type [omnidirectional or directional (includes sectored)]: Directional
15. Height above ground of the lowest point of the antenna (in meters): 11.13
16. ☐ Check if all of the following are true:
    (a) This facility will be operated in the Multipoint Distribution Service, Paging and Radiotelephone Service, Cellular Radiotelephone Service, Narrowband or Broadband Personal Communications Service, Private Land Mobile Radio Services Paging Operations, Private Land Mobile Radio Service Specialized Mobile Radio, Local Multipoint Distribution Service, or service regulated under Part 74, Subpart I (see question 12).
    (b) This facility will not be mounted on a building (see question 13).
    (c) The lowest point of the antenna will be at least 10 meters above the ground (see question 15).

If box 16 is checked, this facility is categorically excluded and is unlikely to cause exposure in excess of the FCC's guidelines. The remainder of the checklist need not be completed. If box 16 is not checked, continue to question 17.

17. Enter the power threshold for categorical exclusion for this service from the attached Table 1 in watts ERP or EIRP* (note: EIRP = (1.64) X ERP): 1640 W
18. Enter the total number of channels if this will be an omnidirectional antenna, or the maximum number of channels in any sector if this will be a sectored antenna: 4
19. Enter the ERP or EIRP per channel (using the same units as in question 17): 4046.31 W
20. Multiply answer 18 by answer 19: 16185.24 W
21. Is the answer to question 20 less than or equal to the value from question 17 (yes or no)?

If the answer to question 21 is YES, this facility is categorically excluded. It is unlikely to cause exposure in excess of the FCC's guidelines.

If the answer to question 21 is NO, this facility is not categorically excluded. Further investigation may be appropriate to verify whether the facility may cause exposure in excess of the FCC's guidelines.

*"ERP" means "effective radiated power" and "EIRP" means "effective isotropic radiated power

Optional Local Government Checklist (page 2)

EVALUATION OF CATEGORICAL EXCLUSION

12. Licensed Radio Service (see attached Table 1): Cellular Radiotelephone Services
13. Structure Type (free-standing or building/roof-mounted): Free - Standing
14. Antenna Type [omnidirectional or directional (includes sectored)]: Directional
15. Height above ground of the lowest point of the antenna (in meters): 11.13
16. ☐ Check if all of the following are true:
    (a) This facility will be operated in the Multipoint Distribution Service, Paging and Radiotelephone Service, Cellular Radiotelephone Service, Narrowband or Broadband Personal Communications Service, Private Land Mobile Radio Services Paging Operations, Private Land Mobile Radio Service Specialized Mobile Radio, Local Multipoint Distribution Service, or service regulated under Part 74, Subpart I (see question 12).
    (b) This facility will not be mounted on a building (see question 13).
    (c) The lowest point of the antenna will be at least 10 meters above the ground (see question 15).

If box 16 is checked, this facility is categorically excluded and is unlikely to cause exposure in excess of the FCC's guidelines. The remainder of the checklist need not be completed. If box 16 is not checked, continue to question 17.

17. Enter the power threshold for categorical exclusion for this service from the attached Table 1 in watts ERP or EIRP* (note: EIRP = (1.64) X ERP): 1640 W
18. Enter the total number of channels if this will be an omnidirectional antenna, or the maximum number of channels in any sector if this will be a sectored antenna: 4
19. Enter the ERP or EIRP per channel (using the same units as in question 17): 2477.76 W
20. Multiply answer 18 by answer 19: 9911.04 W
21. Is the answer to question 20 less than or equal to the value from question 17 (yes or no)?

If the answer to question 21 is YES, this facility is categorically excluded. It is unlikely to cause exposure in excess of the FCC's guidelines.

If the answer to question 21 is NO, this facility is not categorically excluded. Further investigation may be appropriate to verify whether the facility may cause exposure in excess of the FCC's guidelines.

*"ERP" means "effective radiated power" and "EIRP" means "effective isotropic radiated power

PATRONELLA
Propagation Maps

October 9, 2019

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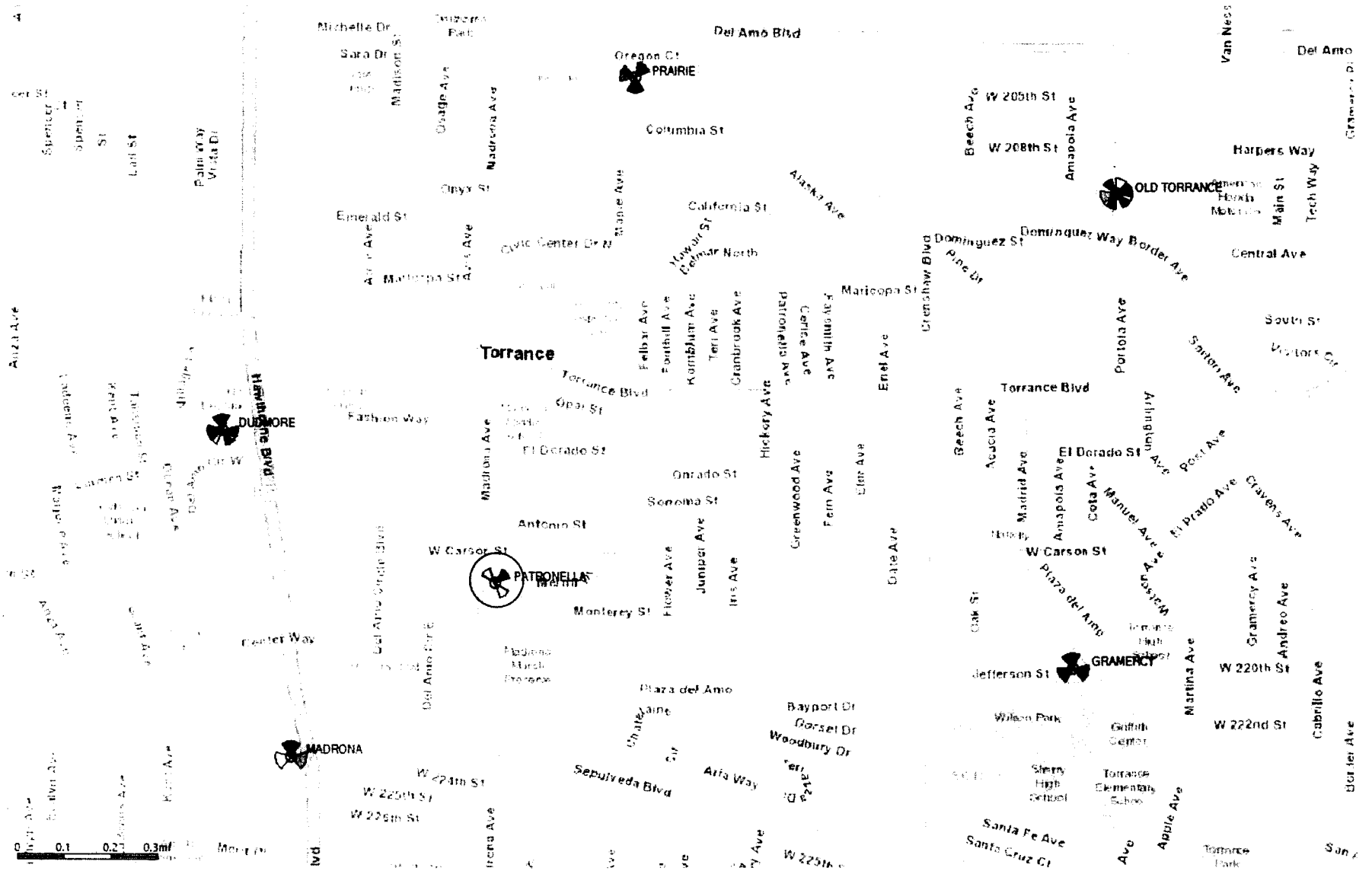
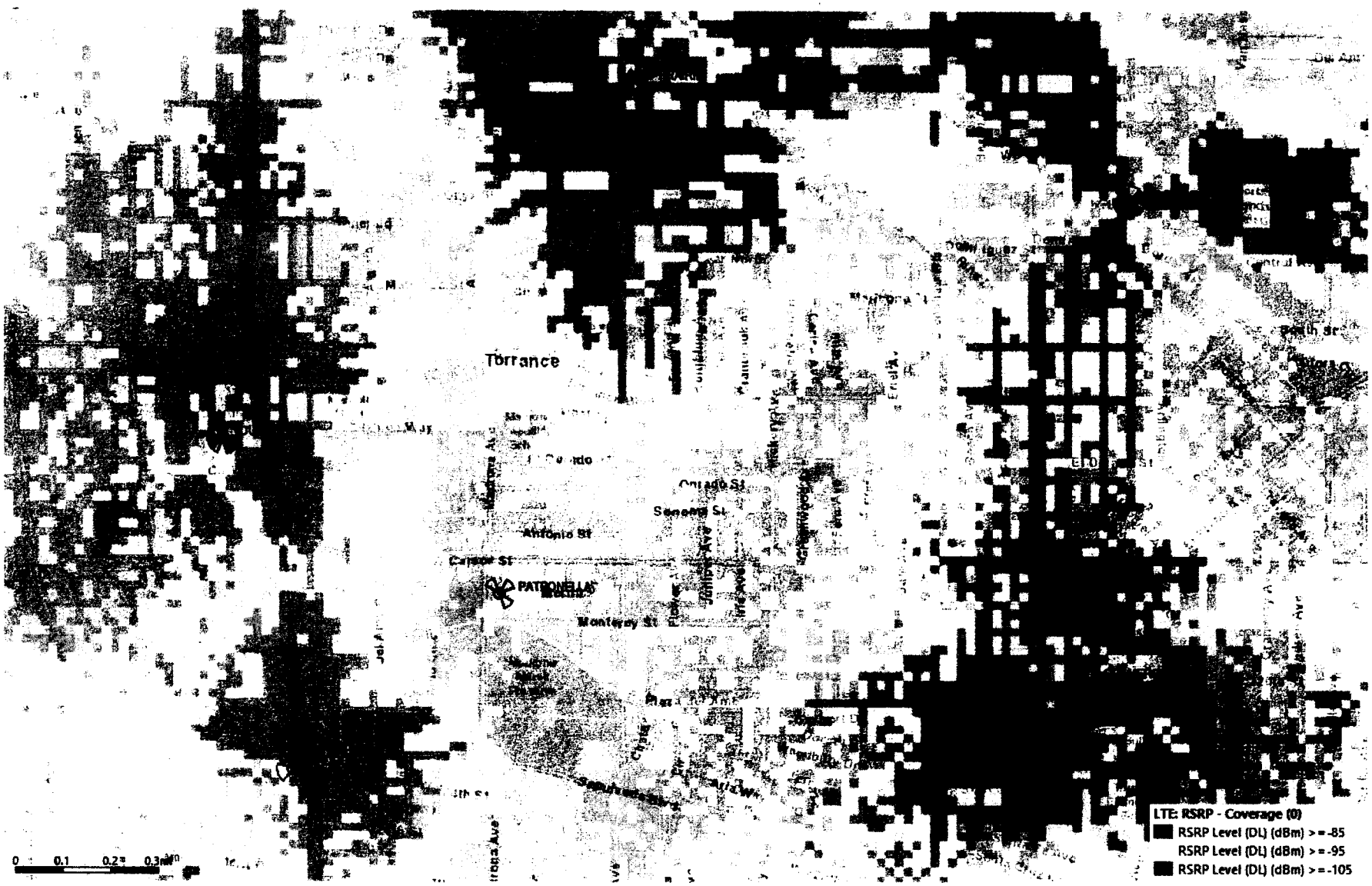
PATRONELLA – General Map

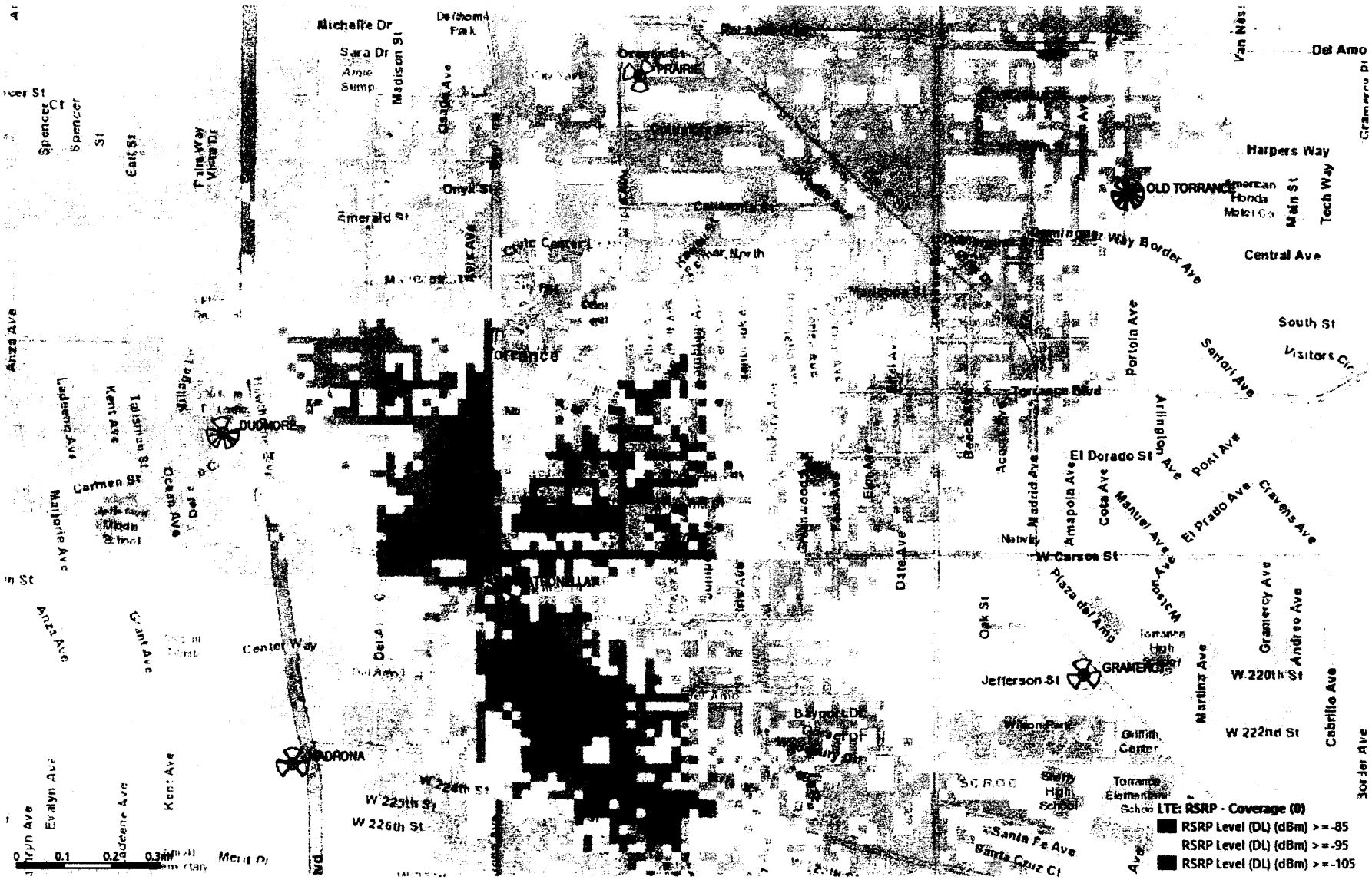


Verizon Coverage without PATRONELLA



Verizon Coverage with PATRONELLA

PATRONELLA Coverage Only



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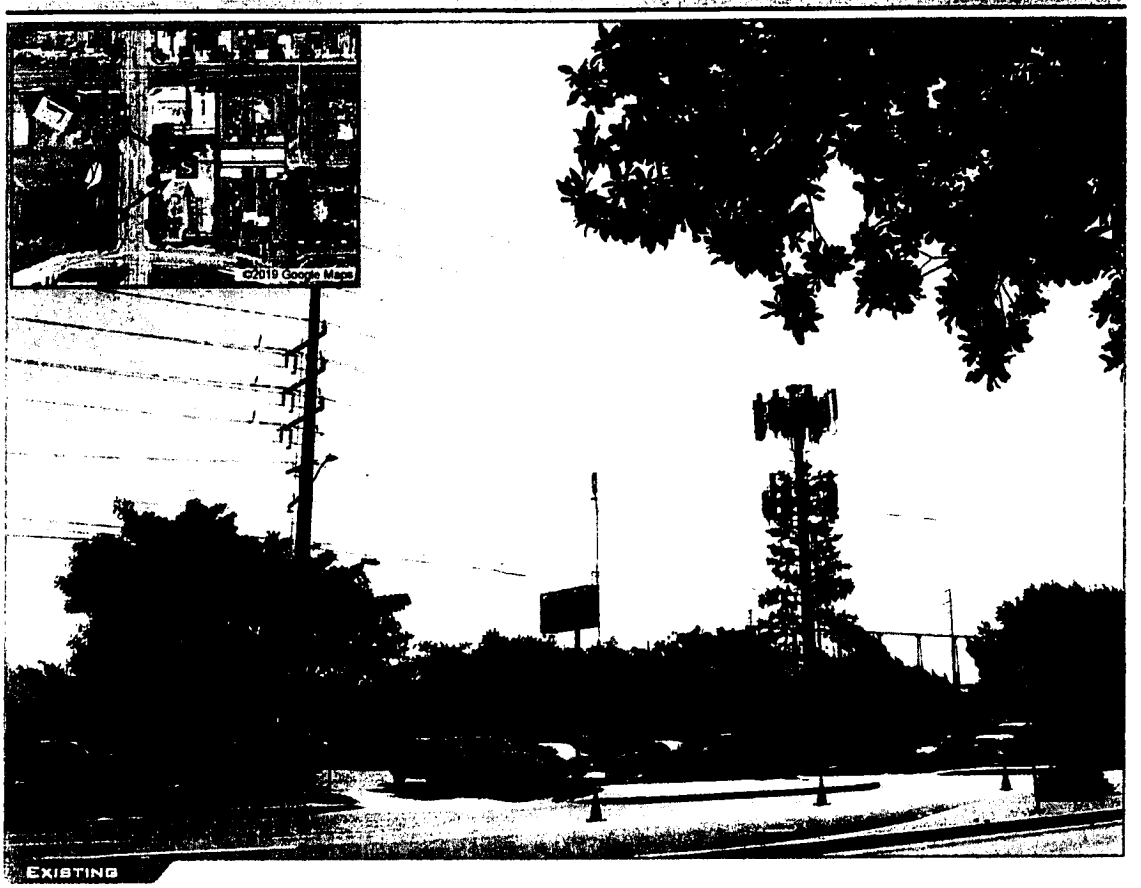

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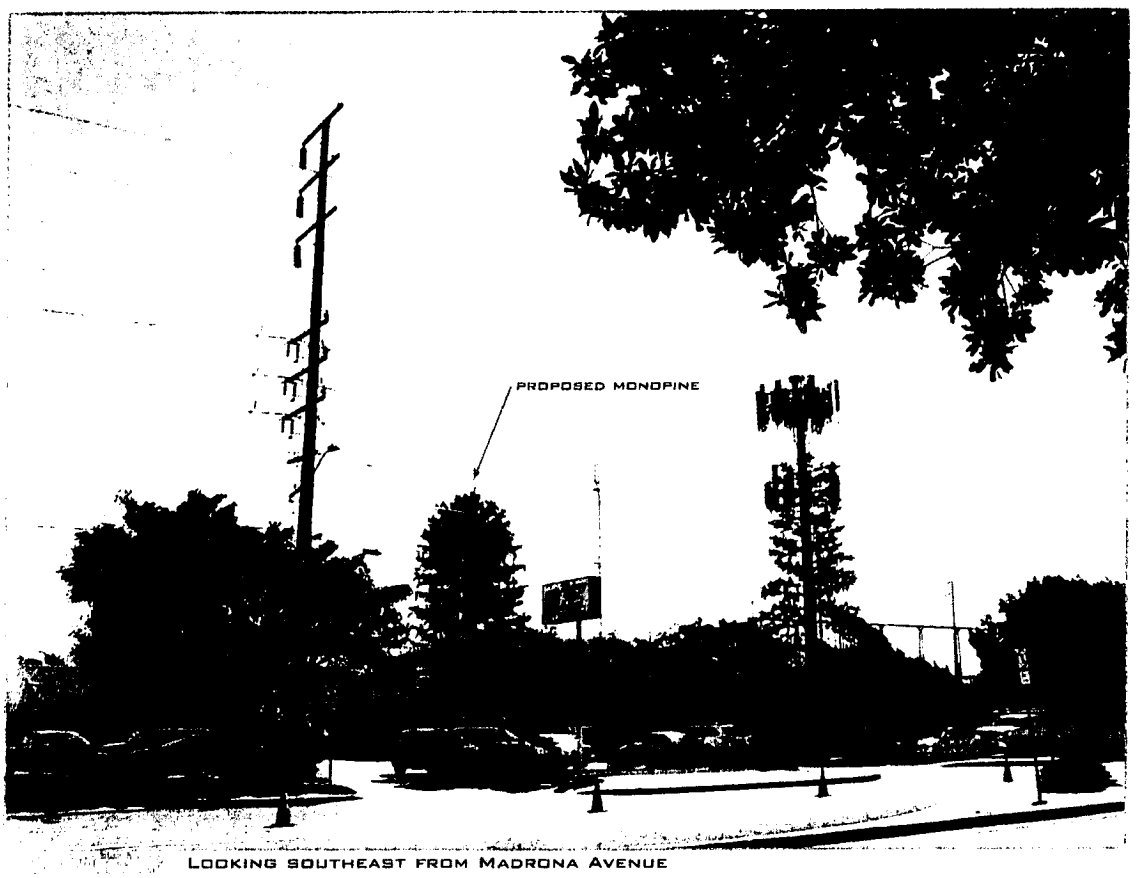

LOOKING SOUTHEAST FROM MADRONA AVENUE

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PR

Attachment 7

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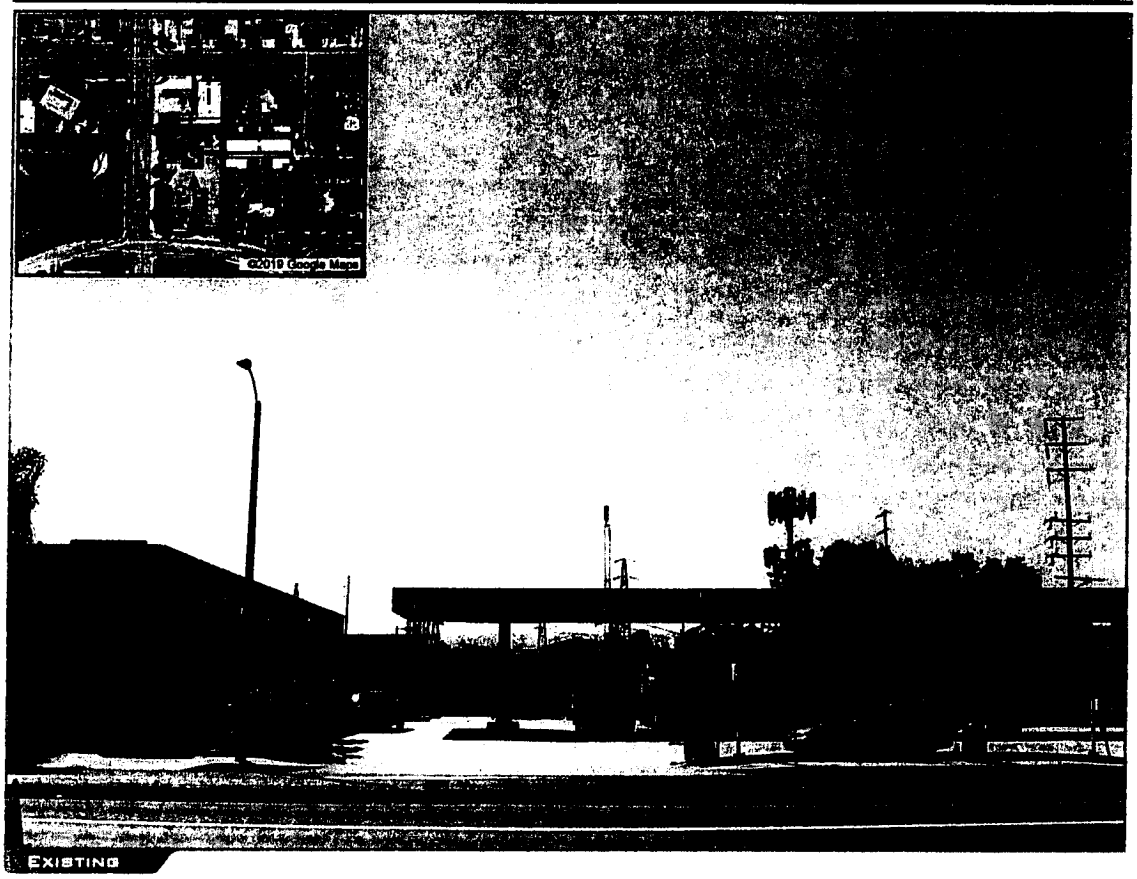
VIEW 5



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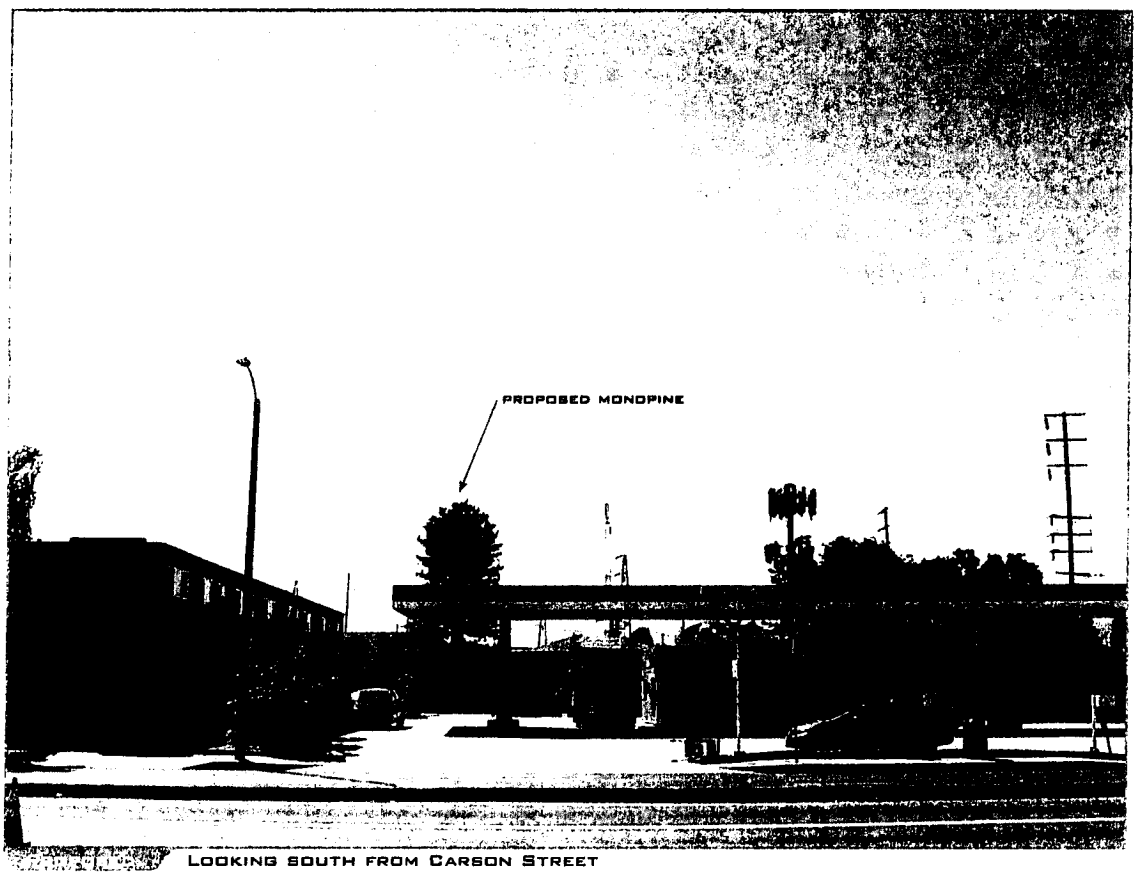

LOOKING SOUTH FROM CARSON STREET

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.

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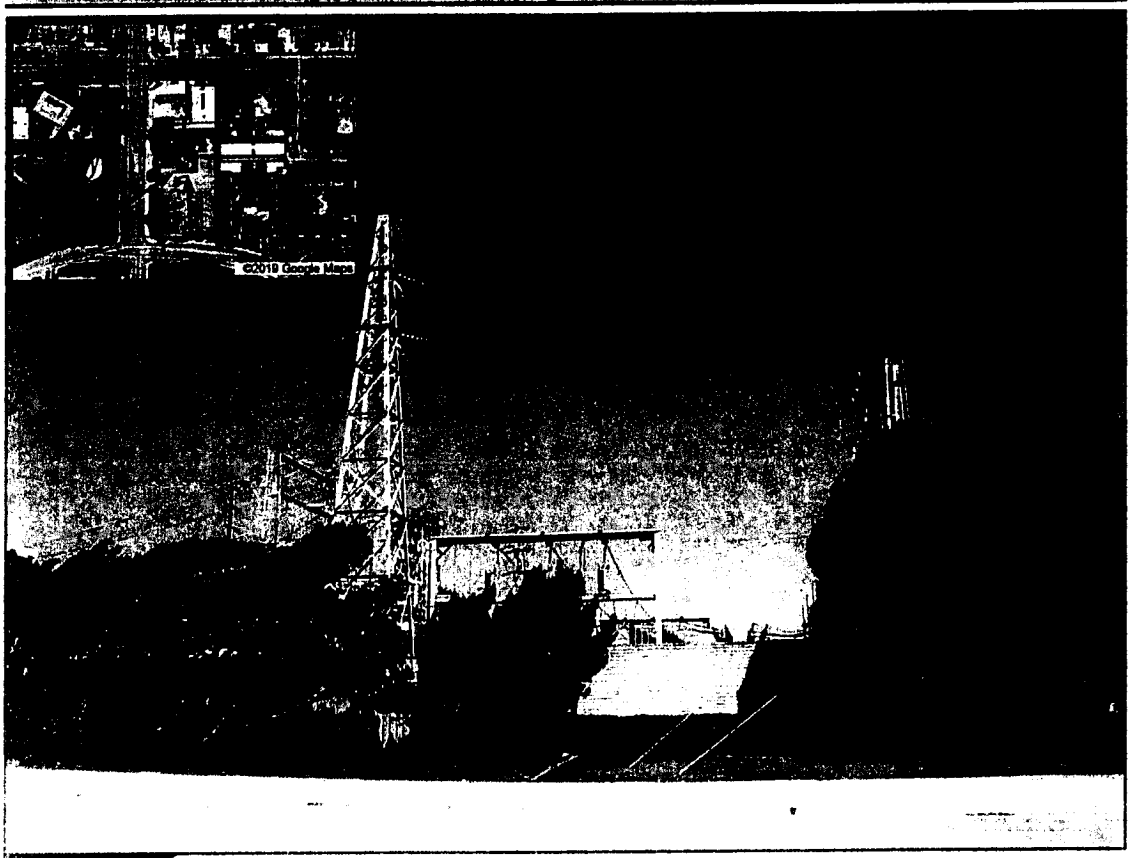
VIEW 4



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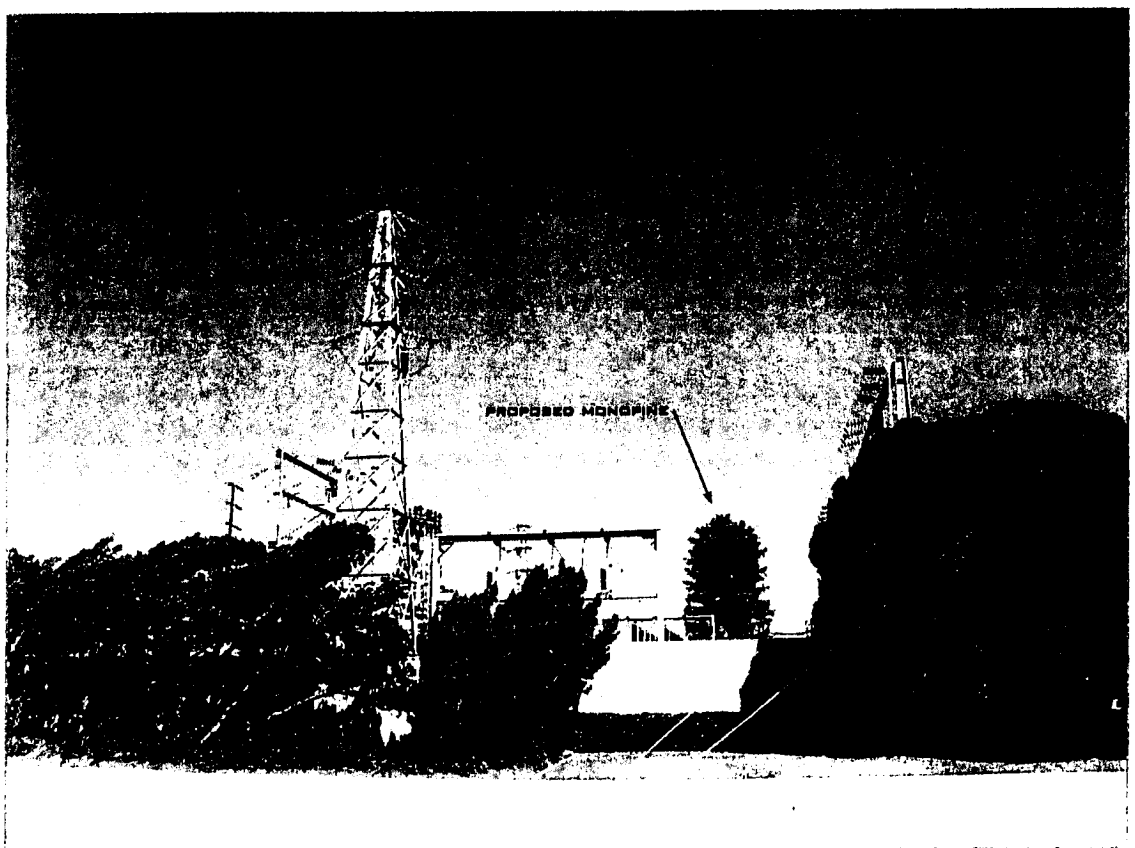

LOOKING NORTH FROM PLAZA DEL AMO

ACCURACY OF PHOTO SIMULATION BASED UPON INFORMATION PROVIDED BY PROJECT APPLICANT.