



Agenda Report

TO: CITY COUNCIL

DATE: APRIL 30, 2007

FROM: CITY MANAGER

SUBJECT: APPEAL OF MINOR CONDITIONAL USE PERMIT #4808,
INTERSECTION OF SOUTH OAK KNOLL AVENUE AND ALPINE
STREET RIGHT-OF-WAY.

RECOMMENDATION

It is recommended that the City Council:

1. Acknowledge that this action is categorically exempt from CEQA; and
2. Approve Minor Conditional Use Permit #4808 to allow the replacement of an existing 29'-6" street light pole with a new street light pole of the same height and design with the addition of a five-foot tall and six-inch diameter wireless telecommunications antenna on top. Also included is the installation of related mechanical equipment at grade and below grade.

PREVIOUS ACTIONS

Hearing Officer

At the January 17, 2007 public hearing, staff recommended that the Hearing Officer approve the application. After public testimony, the Hearing Officer approved the project, with the conditions that are listed in Attachment B to this report.

Board of Zoning Appeals

The Oak Knoll Neighborhood Association appealed the approval decision to the Board of Zoning Appeals. At the March 14 public hearing, and after additional public testimony in opposition, the Board voted 4-0 to disapprove the application. The finding for disapproval is attached as Attachment D.

City Council Appeal

The applicant subsequently appealed (Attachment E) the disapproval decision of the Board of Zoning Appeals to the City Council on the basis that: 1) the Board's decision was based on an environmental determination that is not supported by the evidence presented by the applicant; and 2) the application had a tree inventory for the wrong site.

BACKGROUND

Last October, the applicant, Omnipoint Communications, Inc. submitted a Minor Conditional Use Permit application to allow the replacement of an existing 29'-6" street light pole with a new street light pole of the same height and design, and in the same location in the public right-of-way, on the east side of South Oak Knoll Avenue at the intersection with Alpine Street. The new light pole would include the addition of a five-foot tall, six-inch diameter, wireless telecommunications antenna on top. Also included in the proposal is the installation of related mechanical equipment at grade and below grade. A Minor Conditional Use Permit is required for all co-located wireless telecommunications facilities.

Staff recommends the application be approved because: 1) a co-located wireless facility in the public right-of-way is allowed through a Minor Conditional Use Permit, 2) the design of the new street light pole is conditioned by the Public Works Department to be identical in appearance to the existing pole; 3) the height of the power meter is conditioned by the Public Works Department to be no higher than the grade of Oak Knoll Avenue; 4) the facility is needed to increase capacity and minimize dropped calls in this area; 5) this is one of the least intrusive ways to meet this need; and 6) the wireless emissions for the facility will be significantly below the level allowed by the Federal Communications Commission.

At both the Hearing Officer and Board of Zoning Appeals hearings many residents opposed the application on the grounds that the wireless telecommunications antenna would have negative health impact, would be unattractive, would impact the trees in the right-of-way, and would have a negative impact on property values.

As noted in the findings for this application, the Federal Communications Act of 1996 set a threshold below which radio frequencies may operate. Provided a wireless facility operates below this level, and according to the applicant the proposed facility would operate significantly below this threshold, 47 U.S.C. § 332(c)(7)(B)(iv) states, "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." A wireless telecommunications facility may only operate provided it complies with federal regulations and if it does comply, an application for such a facility may not be denied on health grounds.

Several neighbors spoke that the antenna and related mechanical equipment would be unattractive. Painting and texturing the five-foot tall and six-inch diameter antenna to match the light pole is an appropriate way to camouflage the antenna. The mechanical vault will be underground and what will be visible is the concrete top and vents that are at grade. The height of the power meter is being conditioned to be lowered so that it is not higher than Oak Knoll Avenue. One of the recommended conditions of approval is that a landscape plan be approved by the Zoning Administrator that involves the screening of the exposed equipment (power meter) and walls.

Several of the speakers were concerned that the location of the power meter and the need for excavation in order to lower it out of sight from Oak Knoll Avenue would impact the roots of the trees in the right-of-way and therefore impact the trees. Staff from the Urban Forestry Division of Public Works has visited the site and confirmed that the location of the power meter and retaining/screening wall is not within the drip-line of any trees and therefore not where any roots would be. No impact on any of the trees is anticipated.

When the Board of Zoning Appeals voted to disapprove the application, they expressed several concerns. These included that the City did not have a comprehensive plan for where in the City co-located wireless antennae may be located, that this would be the first such facility and would be precedent-setting, and that the antenna and related mechanical equipment would adversely impact the views of, and enjoyment of, the landscaped right-of-way.

The Zoning Code is the plan that states where wireless telecommunications antennae may be located. It is the intent of the Zoning Code to encourage the co-location of such facilities and discourage 'mono-poles'. Only co-located antennae within the public right-of-way are allowed. The Minor Conditional Use Permit process allows the City to impose operational conditions on a project to mitigate its possible impacts. Only the wireless companies know their service needs, making it difficult for the City to have a comprehensive plan.

Finally, the visual impact of the antennae will be minimal, as stated above. The screening of the power pedestal, the underground vault, and the camouflaging of the antennae to match the pole are sufficient to mitigate the possible visual impact of the wireless telecommunications facility.

ENVIRONMENTAL DETERMINATION

This project was determined to be categorically exempt, Class 1, from environmental review pursuant to the guidelines of the California Environmental Quality Act (Public Resources Code §21080(b)(9); Administrative Code, Title 14, Chapter 1, §15302, Replacement or Reconstruction and §15311, Accessory Structures). Exemption 15302 consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will

have substantially the same purpose and capacity as the structure replaced. Exemption 15311 consists of the construction, or placement of minor structures accessory to commercial, industrial, or institutional facilities

FISCAL IMPACT

The project will generate plan check permit fees and construction tax.

Respectfully submitted,


Cynthia J. Kurtz
City Manager

Prepared by:


David Sinclair
Associate Planner

Approved by:


Richard J. Bruckner, Director
Planning and Development Department

Attachments:

- A. Specific Findings For Minor Conditional Use Permit #4808
- B. Conditions Of Approval For Minor Conditional Use Permit #4808
- C. Conditions Of Approval For Minor Conditional Use Permit #4808 (Public Works Department)
- D. Specific Finding For Minor Conditional Use Permit #4808 (Board of Zoning Appeals)
- E. Appeal Application
- F. Photo-simulations of Proposed Facilities
- G. Construction Drawings

ATTACHMENT A
SPECIFIC FINDING FOR MINOR CONDITIONAL USE PERMIT #4808

1. *The proposed use is allowed with a Minor Conditional Use Permit within the applicable zoning district and complies with all applicable provisions of this Zoning Code in that the co-location of telecommunications facilities is permitted in RS zones in the City, when located within the public right-of-way. The proposal meets the development standards as specified in Section 17.50.310 (Telecommunication Facilities) of the Zoning Code for co-location by camouflaging the antenna by painting and texturing the antenna to match the light pole, placing the mechanical equipment vault below grade, and screening the power pedestal with a wall and vegetation.*
2. *The location of the proposed use complies with the special purposes of this Zoning Code and the purposes of the applicable zoning district in that the telecommunications equipment is designed to be integrated with the existing street pole, below grade, and screened from public view. The project is an allowed use with a Minor Conditional Use Permit in the RS zoning district as it is co-located on a street light and located in the public right-of-way.*
3. *The proposed use is in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of any applicable specific plan in that an objective of the General Plan Land Use Element is to assure that new and/or incidental development is consistent and compatible with the surrounding commercial and residential districts. The design and positioning of the proposed facility takes advantage of the wide public right-of-way that exists between South Oak Knoll Avenue and Canon Drive and all telecommunication equipment is designed to be screened and/or camouflaged so that is it compatible with the existing infrastructure in the neighborhood.*
4. *The establishment, maintenance, or operation of the use would not, under the circumstances of the particular case, be detrimental to the health, safety, or general welfare of persons residing or working in the neighborhood of the proposed use in that the proposed telecommunication facilities must comply with the federally adopted health and safety thresholds established in the Federal Communications Act of 1996. The proposed telecommunication facilities will operate in full compliance with the U.S. standards for radio frequency emissions as published by the American National Standards Institute (ANSI). Similar telecommunication facilities such as this have been documented to operate and transmit at levels far below the federal standards. No significant impacts are anticipated as a result of this project.*

Further, the federal statute limiting local regulation of wireless facility RF emissions is located in 47 U.S.C. § 332(c)(7)(B)(iv). It states that if a proposed wireless facility complies with Federal Communications Commission regulations, then a City cannot deny a permit based upon RF emissions of a facility: "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."

5. *The use, as described and conditionally approved, would not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the City in that the telecommunications facility is strictly regulated by the Federal Communications Commission (FCC) and that the telecommunication facilities will operate at or below the threshold of significance as regulated by the FCC that is deemed safe for human exposure to radio frequency and electromagnetic fields.*
6. The design location, operating characteristics, and size of the proposed use would be compatible with the existing and future land uses in the vicinity in terms of aesthetic values, character, scale, and view protection in that the telecommunications equipment is designed to be integrated with the existing street pole, below grade, and screened from public view. The project is an allowed use with a Minor Conditional Use Permit in the RS zoning district as it is co-located on a street light and located in the public right-of-way.

ATTACHMENT B
CONDITIONS OF APPROVAL FOR MINOR CONDITIONAL USE PERMIT #4808

The applicant or successor in interest shall meet the following conditions:

1. The site plan and elevations submitted for building permits shall substantially conform to the plans, elevations, and photo-simulations submitted with this application and stamped "Received at Hearing January 17, 2007," except as modified herein.
2. The applicant shall comply with Section 17.50.310 of the Zoning Code, which relates to the establishment of Telecommunications Facilities.
3. The use of chain-link fencing or razor wire in the design of a facility or related support facilities is prohibited.
4. No off-premise or on-premise signs may be placed by a wireless telecommunication service provider on a support structure to which the antenna is attached.
5. If a support structure, or an antenna array affixed to a building or support structure, becomes inoperable or ceases to be used for a period of 180 consecutive days, the permittee shall give written notice of inoperability or non-use to the Zoning Administrator and the inoperable equipment or structure shall be removed within 90 days. If other equipment is affixed to the same support structure, then only the equipment that has become inoperable or has ceased to be used is required to be removed and the support structure may remain in place until all service providers cease to use it. If removal does not occur, the City may remove the inoperable equipment or structure at the permittee's expense.
6. A copy of the decision letter along with the "Final Conditions of Approval" shall be incorporated into the construction plans prior to the plans being submitted for Plan Check.
7. The applicant or successor in interest shall meet the applicable code requirements of all other City Departments.
8. The proposed project, Case Number **PLN2006-00592**, shall meet the conditions of approval and is subject to a **Final Zoning Inspection** prior to the issuance of a Certificate of Occupancy. Please contact the Code Compliance Staff at (626) 744-4633 to schedule an inspection appointment time once the building permit has been issued and the project complete.
9. Landscaping and irrigation shall be installed in accordance with a detailed plan to be submitted to and approved by the Zoning Administrator prior to issuance of any building permits. Said plan shall screen all exposed equipment and fencing/walls constructed as part of the project. Said plan shall include drought resistant plant

materials and low volume irrigation where practicable. The plan shall be prepared by a licensed landscape architect and shall meet the requirements of Chapter 17.44.

ATTACHMENT C
CONDITIONS OF APPROVAL FOR MINOR CONDITIONAL USE PERMIT #4808
(PUBLIC WORKS DEPARTMENT)

DATE: December 11, 2006

TO: Denver Miller, Zoning Administrator
Planning and Development Department

FROM: City Engineer
Department of Public Works

RE: Minor Conditional Use Permit No. 4808
Oak Knoll Avenue / Alpine Street Right-of-Way

The Department of Public Works has reviewed the application for Minor Conditional Use Permit No. 4808 at the intersection of Oak Knoll Avenue and Alpine Street. The applicant, Omnipoint Communications, is proposing to replace an existing street light pole with a new street light pole with a five-foot tall wireless telecommunications antenna on top. The total height would increase from 29'-6" to 35 feet. The installation of an underground mechanical vault adjacent to the light pole and a four-foot tall power meter box are also proposed. The approval of this Minor Conditional Use Permit should be based upon satisfying all of the following conditions:

1. The applicant shall obtain an encroachment agreement from the City for the street lighting/private telecommunications antenna shared pole in the public right-of-way. The encroachment agreement application for private improvement within the public right-of-way shall be submitted to the Department of Public Works for review and shall be approved by the City Council prior to the construction of the private improvement. The encroachment agreement will allow the applicant to install and maintain the private improvements within the public right-of-way with conditions.
2. Excavations in the street for utility connections will require that the street be restored between extreme excavations and in rectangular sections per Standard Plan S-416.
3. The applicant shall remove and reconstruct concrete curb, gutter and sidewalk in rectangular sections where excavations for utility connections are made.
4. The street light/antenna pole shown on the plan is not acceptable. The pole shall be identical in appearance to the City S-922 pole, except for the antenna extension added to the top of the pole. The pole can either be a modified S-922 pole or an octagonal pole without a base with a clamp-on concrete base added to match the base of an S-922 pole.

5. The block walls on the slope for the meter pedestal are not acceptable. The pad and block walls for the meter pedestal shall be cut into the slope so as not to extend above existing grade. The meter pedestal and block walls shall not be visible from Oak Knoll Avenue or Alpine Street. The applicant shall add landscaping on the face of the slope so that the pedestal structure and block wall are obscured from view along Canon Drive.
6. No Public Works permits shall be issued for any work on this project, including exploratory work, unless and until Minor Conditional Use Permit No. 4808 is approved and plans are approved by Public Works.
7. All costs associated with these conditions shall be the applicant's responsibility. Unless otherwise noted in this memo, all costs are based on the General Fee Schedule that is in effect at the time these conditions are met. A processing fee will be charged against all deposits.

In addition to the above conditions, the requirements of the following ordinances may apply to the proposed project:

- Sidewalk Ordinance - Chapter 12.04 of the Pasadena Municipal Code (PMC)
In accordance with Section 12.04.035, entitled "Abandoned Driveways" of the PMC, the applicant shall close any unused drive approach with standard concrete curb, gutter and sidewalk. In addition, the applicant shall repair any existing or newly damaged sidewalk along the subject frontage prior to the issuance of a Certificate of Occupancy or any building permit for work in excess of \$5,000 pertaining to occupancy or construction on the property in accordance with Section 12.04.031, entitled "Inspection required for Permit Clearance" of the PMC.
- City Trees and Tree Protection Ordinance - Chapter 8.52 of the PMC
The ordinance provides for the protection of specific types of trees on private property as well as all trees on public property. No street trees in the public right-of-way shall be removed without the approval of the Urban Forestry Advisory Committee.

If you have questions regarding the above conditions and requirements of the ordinances, please contact Sean Singletary, of this office, at (626) 744-4273.

DANIEL A. RIX
City Engineer

DAR:ss

ATTACHMENT D
SPECIFIC FINDING FOR MINOR CONDITIONAL USE PERMIT #4808
(BOARD OF ZONING APPEALS)

1. *The proposed use is not in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of any applicable specific plan in that the proposed wireless telecommunications use is not compatible with the surrounding residential neighborhood due to the lack of a comprehensive citywide plan for the orderly distribution of wireless telecommunications facilities in residential zoning districts. Specifically, if allowed this would be the first wireless telecommunications facility in a residential-only zoning district and without a citywide plan it would become precedent-setting. Further, the five-foot tall, six-inch diameter, antenna (attached to the top of the light pole) would adversely impact the views of the vegetated public right-of-way area where the facility is proposed, currently enjoyed by local residents, by interfering with those views. The proposed power pedestal and screening wall would similarly impact the enjoyment of the vegetated area through the removal of an area of ivy to accommodate the pedestal and screening wall. Finally, the underground mechanical vault, adjacent to the light standard, would reduce the ability of the City to add landscaping to the public right-of-way between the street and the sidewalk that is currently not vegetated.*

**ATTACHMENT E
APPEAL APPLICATION**



PASADENA PERMIT CENTER
www.cityofpasadena.net/permitcenter

CITY CLERK
CITY OF PASADENA

07 APR -9 P2:23

RECEIVED

REQUEST FOR APPEAL

APPLICATION INFORMATION

Project Address: Oak Knoll Avenue/Alpine Street Right-of-Way
Case Type (MCUP, TTM, etc.) and Number: Minor Conditional Use Permit #4808
Hearing Date: March 21, 2007 Appeal Deadline: April 9, 2007

APPELLANT INFORMATION

APPELLANT: Omnipoint Communications, Inc. a subsidiary of T-Mobile USA, Inc. Telephone: [714] 850-2400
Address 3 Imperial Promenade, Suite 1100 Fax: []
City Santa Ana State CA Zip: 92707 Email: marcie.brown@t-mobile.com
APPLICANT (IF DIFFERENT): Same

I hereby appeal the decision of the: BOARD OF ZONING APPEALS

- Hearing Officer
- Zoning Administrator
- Design Commission
- Director of Planning and
- Historic Preservation
- Film Liaison

Please contact:
Pete Shubin
Sequoia Deployment Services, Inc
One Venture, Suite 200
Irvine, CA 92821
(714) 478-3197
pete.shubin@sequoia-ds.com
regarding this project.

REASON FOR APPEAL

The decision maker failed to comply with the provisions of the Zoning Code, General Plan or other applicable plans in the following manner (use additional sheets if necessary):

The City's zoning code acknowledges the difficulties inherent in distinguishing between environmental and other grounds for decision. In addition, the scope of review on appeal, as described in the City's code, is also ambiguous. The

applicant (and appellant) therefore cites the following bases for appeal:

- (1) None of the determinations, including any and all environmental determinations, set forth in the decision of March 29, 2007, are supported by substantial evidence, in violation of both state and federal law.
- (2) The Board erroneously relied upon a tree inventory for a project at "1855 Locust". This project is a right-of-way project, to be located on Oak Knoll Avenue at Alpine Street. (Continued on attached.)

Signature of Appellant

April 9, 2007

Date

OFFICE USE ONLY		
PLN # _____	CASE # _____	PRJ # _____
DESCRIPTION _____		
DATE APPEAL RECEIVED _____	APPEAL FEES \$ _____	RECEIVED BY: _____

ATTACHMENT TO REQUEST FOR APPEAL

Oak Knoll Avenue/Alpine Street Right-of-Way Minor Conditional Use Permit #4808

- (3) The denial of the subject application for this right-of-way facility violates the franchise rights granted by section 7901 of the California Public Utilities Code, and constitutes a prohibition of service, in violation of federal law.
- (4) The decision was in fact motivated by allegations of the effects of RF emissions, in violation of federal law.
- (5) The appeal is based on applicable law, both state and federal, and the facts provided previously by the applicant, including the facts provided at previous hearings, and all facts and grounds cited by Staff in support of approval.
- (6) Other grounds to be briefed prior to or at the hearing on the appeal.



PLANNING & DEVELOPMENT DEPARTMENT
PLANNING DIVISION

March 29, 2007

Rich Schammel
Oak Knoll Neighborhood Association
1296 S. Oak Knoll Ave.
Pasadena, CA. 91106

Re: **Minor Conditional Use Permit #4808**
Oak Knoll Avenue / Alpine Street Right-of-Way
PLN2006-00582

Dear Mr. Schammel:

The appeal for **Minor Conditional Use Permit #4808** at **Oak Knoll/Avenue Street Right-of-Way** was considered by the **Board of Zoning Appeals** on **March 28, 2007**.

MINOR CONDITIONAL USE PERMIT: To replace an existing street light pole with a new street light pole with a five-foot tall wireless telecommunications antenna on top. The total height would increase from 29'-6" to 35 feet. The installation of an underground mechanical vault adjacent to the light pole and a four-foot tall power meter box are also proposed.

After careful consideration of this application, and with full knowledge of the property and vicinity, the Board of Zoning Appeals made the finding as shown on Attachment A to this letter.

Based upon the finding, the Board of Zoning Appeals decided to **overrule** the decision of the Hearing Officer and **disapprove** the Minor Conditional Use Permit.

You are hereby notified that the decision on the Minor Conditional Use Permit by the Board of Zoning Appeals is not subject to further appeal. If, you have reason to believe the Environmental Determination is incorrect, this determination is appealable to the City Council. If the Environmental Determination is appealed, the Council will hold a new hearing on the entire application. In addition, a member of the City Council may stay the decision and request that it be called for review to the City Council. An appeal of the environmental decision shall be within ten days, the last day to file an appeal is **April 9, 2007**. Appeal applications must cite a reason for objecting to a decision. This decision becomes effective on the eleventh day from the date of the decision. The effective date for this case is **April 10, 2007**. It should be noted that the time frame within which judicial review of the decision must be sought is governed by California Code of Civil Procedures, Section 1094.6.

A disapproval is statutorily exempt from the California Environmental Quality Act. For further information regarding this case please contact **David Sinclair** at **(626) 744-6766**.

Sincerely,



DENVER E. MILLER
Zoning Administrator

DEM:ac

Enclosures: Attachment A

xc: City Clerk, City Council, Building Division, Public Works, Power Division, Water Division, Design and Historic Preservation, Hearing Officer, Code Enforcement-Ellen Clark, Case File, Decision Letter File, Planning Commission (9)

cc. Pete Shubin, Sequoia Development Services, One Venture, Suite 200, Irvine, CA 92618

**ATTACHMENT A
SPECIFIC FINDING
FOR DISAPPROVAL OF MINOR CONDITIONAL USE PERMIT #4808**

Co-location of a wireless telecommunications antenna.

1. *The proposed use is not in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of any applicable specific plan in that the proposed wireless telecommunications use is not compatible with the surrounding residential neighborhood due to the lack of a comprehensive citywide plan for the orderly distribution of wireless telecommunications facilities in residential zoning districts. Specifically, if allowed this would be the first wireless telecommunications facility in a residential-only zoning district and without a citywide plan it would become precedent-setting. Further, the five-foot tall, six-inch diameter, antenna (attached to the top of the light pole) would adversely impact the views of the vegetated public right-of-way area where the facility is proposed, currently enjoyed by local residents, by interfering with those views. The proposed power pedestal and screening wall would similarly impact the enjoyment of the vegetated area through the removal of an area of ivy to accommodate the pedestal and screening wall. Finally, the underground mechanical vault, adjacent to the light standard, would reduce the ability of the City to add landscaping to the public right-of-way between the street and the sidewalk that is currently not vegetated.*

**ATTACHMENT F
PHOTO-SIMULATIONS OF PROPOSED FACILITIES**

**ATTACHMENT G
CONSTRUCTION DRAWINGS**

April 23, 2007



Mayor William Bogaard
City of Pasadena
100 N. Garfield Avenue, Room 237
Pasadena, CA 91109

With respect to the appeal of Zoning Appeals Board Ruling MCUP#4808 the Madison Heights Neighborhood Association supports the decision by that Board to deny permission for installation of the Omnipoint Communications (T-Mobile) cellular antenna in the public right-of-way on Oak Knoll Avenue at the intersection of Alpine Street. We are opposed to any reversal of this decision as permission for this installation would pose a threat to our, and other, residential neighborhoods.

The critical issue is that no City-wide plan exists for installation of cellular antennas in residential neighborhoods. If this first installation is allowed, this precedent may require the City to allow other cellular suppliers to make similar installations in residential neighborhoods.

If a specific location is deemed suitable for a cellular antenna the City must first seek competitive bids as provided for in the Pasadena Municipal Code (Title 18, Section 18.02.020, Paragraph B, Item 2) as it is required

To authorize and to manage reasonable access to the city's public rights-of-way and public property for cable, video and telecommunications purposes on a competitively neutral and nondiscriminatory basis.

Furthermore, the same paragraph of the Code, Item 3 requires the City

To obtain fair and reasonable compensation for the city and its residents for authorizing the private use of the public rights-of-way and public property.

The installation of a cellular antenna with associated underground vault and aboveground power meter is likely to impact the value of nearby homes in an historical and architecturally significant neighborhood. No determination of economic impact has been made by the City in this instance.

We also conclude that residents of our neighborhood will derive no significant benefit from this cellular antenna installation. No evidence that residents of our neighborhood experience coverage problems with T-Mobile was provided at the Zoning Appeals Board hearing. The only information provided was that the T-Mobile system records the number of "dropouts" in a given area. Dropouts are likely in the downhill San Marino portion of Oak Knoll Avenue.

We recognize that cellular telecommunications and wi-fi services are important to our City. We ask that the City first develop a comprehensive plan for effective infrastructure that is compatible with our residential neighborhoods.

Sincerely,


Neil Kleinman, President