MASTER APPEAL FORM

WITH ATTACHMENTS

Application:

APPEAL APPLICATION

This application is to be used for any appeals authorized by the Los Angeles Municipal Code (LAMC) for discretionary actions administered by the Department of City Planning.

1. APPELLANT BODY/CASE INFORMATION

Appellant Body:

☒ Area Planning Commission ☐ City Planning Commission ☐ City Council ☐ Director of Planning

Regarding Case Number: ZA 2015-0838

Project Address: 1650 Echo Park Avenue, Los Angeles CA 90026

Final Date to Appeal: 02/19/2016

Type of Appeal:
- ☑ Appeal by Applicant
- ☐ Appeal by a person, other than the applicant, claiming to be aggrieved
- ☐ Appeal from a determination made by the Department of Building and Safety

2. APPELLANT INFORMATION

Appellant's name (print): Verizon Wireless

Company: Verizon Wireless

Mailing Address: 15505 Sand Canyon Avenue, Building D

City: Irvine State: CA Zip: 91618

Telephone: (714) 396-0459 E-mail: stella.shih@rlsusa.com

- Is the appeal being filed on your behalf or on behalf of another party, organization or company?

  ☑ Self ☐ Other: _____

- Is the appeal being filed to support the original applicant's position? ☑ Yes ☐ No

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): Stella Shih

Company: Reliant Land Services

Mailing Address: 1745 W. OrangewoodAvenue, Suit 103

City: Orange State: CA Zip: 92868

Telephone: (714) 396-0459 E-mail: stella.shih@rlsusa.com

4. JUSTIFICATION/REASON FOR APPEAL

Is the entire decision, or only parts of it being appealed? ☑ Entire ☐ Part

Are specific conditions of approval being appealed? ☐ Yes ☑ No

If Yes, list the condition number(s) here: _____

Attach a separate sheet providing your reasons for the appeal. Your reason must state:

- The reason for the appeal
- How you are aggrieved by the decision
- Specifically the points at issue
- Why you believe the decision-maker erred or abused their discretion

5. APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant Signature: Stella Date: 2/16/2016

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- Eight (8) sets of the following documents are required for each appeal filed (1 original and 7 duplicates):
  - Appeal Application (form CP-7769)
  - Justification/Reason for Appeal
  - Copies of Original Determination Letter
- A Filing Fee must be paid at the time of filing the appeal per LAMC Section 19.01 B.
  - Original applicants must provide a copy of the original application receipt(s) (required to calculate their 85% appeal filing fee).
- Original Applicants must pay mailing fees to BTC and submit a copy of receipt.
- Appellants filing an appeal from a determination made by the Department of Building and Safety per LAMC 12.26 K are considered original applicants and must provide noticing per LAMC 12.26 K.7.
- A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.
- Appeals of Density Bonus cases can only be filed by adjacent owners or tenants (must have documentation).
- Appeals to the City Council from a determination on a Tentative Tract (TT or VTT) by the Area or City Planning Commission must be filed within 10 days of the date of the written determination of said Commission.
- A CEQA document can only be appealed if a non-elected decision-making body (ZA, APC, CPC, etc.) makes a determination for a project that is not further appealable. (CA Public Resources Code § 21151 (c)). CEQA Section 21151 (c) appeals must be filed within the next 5 meeting days of the City Council.

This Section for City Planning Staff Use Only		
Base Fee:	Reviewed & Accepted by (DSC Planner):	Date:
Receipt No:	Deemed Complete by (Project Planner):	Date:
☐ Determination authority notified	☐ Original receipt and BTC receipt (if original applicant)	

February 18th, 2016

Office of Zoning Administration
David Weintraub
200 N. Spring Street, 7th floor
Los Angeles, CA 90012

City of Los Angeles Department of City Planning – Appeal Application
Case No. ZA 2015-0838 (CUW) Conditional Use
1650 North Echo Park Avenue, Los Angeles 90026

Section 4: Justifications for Appeal:

Decision-maker Erred/Abuse of Discretion:

Verizon Wireless submitted, on February 26, 2015, a Conditional Use application for a wireless telecommunication facility at 1650 North Echo Park Avenue, Case No. ZA 2015-0838 (CUW) to the City of Los Angeles. On October 1, 2015, the City of Los Angeles held a public hearing. Pursuant to Los Angeles Municipal Code Section 12.24-W.49 and Section 12.24-F, the Zoning Administrator denied Verizon Wireless project at 1650 North Echo Park Avenue, Case No. ZA20150383 (CUW).

The Zoning Administrator ("ZA") lacked substantial evidence for the stated findings of denial and the denial of the project will violate federal law including, without limitation, constituting a prohibition of service in violation of 47 U.S.C.§332 (c)(7)(B)(i)(II), and constituting discrimination between carriers under 47 U.S.C.§332(c)(7)(B)(i)(I).. Supporting documentation will be provided prior to the appeal hearing.

Further, the City's processing of Verizon's application for the facility has far exceeded the time limits established in the Federal Communications Commission's *Declaratory Ruling*, 24 FCC Rcd 13994 (2009), upheld in *City of Arlington v. Federal Communications Commission*, 668 F.3d 229 (5th Cir. 2012). As such, the City's processing effort for this facility violates California Government Code section 65964.1.

Specific Points at Issue:

The denial was based that "both aesthetic and historic resource impacts associated with additional massing on prominent, building rooftop have not been mitigated to a level that does not adversely impact the built environment…such impacts become more noteworthy given the

visibility of the building, and the identification of the site as having historic resource eligibility status."

Reasons for the Appeal:

1. Objection and Appeal Justification on ZA Finding No. 1 -

No substantial evidence supports the ZA's Finding No. 1.

Although one design option would be to place painted antennas matched to the building on the roof without being put behind screening or within screen boxes, the City of Los Angeles strongly prefers (and required here) the antennas to be screened on rooftop sites; thus the proposed design.

The original proposed design with the zoning application consisted of three sectors (four antennas per sector) enclosed in three separate, much smaller screen boxes. Please see attached photo-simulation, Exhibit A. However, this design, with a reduced mass, did not satisfy the need to blend in with the existing building as determined by City Staff. The increased size of the screen wall would give us the opportunity of mimicking the building façade, thereby minimizing the visual impact. The screening is also set back from the edge of the roof and at an angle following the stairwell. The larger screening is actually the least intrusive feasible design in this case. Please find the photo-simulation of revised design included as Exhibit B.

The Proposed Mitigated Negative Declaration prepared by City of Los Angeles Planning Department stated that the potential impact will be mitigated to a less than significant level by disguising the proposed facility so as to blend into the surrounding neighborhood. The proposed antenna screening is set at an angle and set back from the edge of the building. The painted and textured screening extends the vertical element of the main façade and maintains the symmetrical design of the building. Please find the Mitigated Negative Declaration included as Exhibit C.

The subject property is zoned RD 1.5-VL with a 45' height limit. However, the roof of the existing building is at 47'-6" with a building parapet of 49'-6" around the perimeter of the roof. The existing building also has a stairwell at 52'-9" and an elevator shaft/penthouse at 56'-6". The existing building and the features above the roof have already exceeded the 45' height limit. Site survey map and 1A Accuracy Certification attached as Exhibit D to show the height of the existing building. The Verizon proposed top of screening is 9' above the parapet, at 58'-6" which is only 2' above the existing elevator penthouse or only 3.5% (0.035%) above the tallest part of the existing building. The previous drawing had labelled the tip of the screening at 59'-6" due to a mathematical mistake. The case planner, Azeen Khanmalek was informed of the mislabeling via e-mail on August 4, 2015.

Verizon completed a Line of Sight study to illustrate that a person of average height will have to be at least 100' away from the subject building on both directions along Echo Park Ave in order

to see the top of the proposed screen wall. This Line of Sight drawing was presented at the meeting with Echo Park Improvement Association in order to demonstrate the minimum effect of the screen wall on the street level to pedestrians. Please find the Line of Sight included as Exhibit E.

A lot of effort went into the design of the screening, which integrates with the existing visual elements on the building and on surrounding properties. The redesign was based on the feedback from the District Council Office Planning Deputy Gary Benjamin and Echo Park Improvement Association. We presented design option 1 and option 2 to EPIA on July 15, 2015. Design option 1 proposed the top of screen wall at 8' above parapet, design option 2 proposed the screen wall at 9-ft. above screen wall. They preferred option two. Although, the screen wall is 1-ft. higher, it is at an angel and set back from the edge of the roof. Option 1 is only 5-ft. from the edge. Option 2 also maintains the symmetry of the facade. These design changes mitigates the visual impact to the surrounding neighborhood and reduces the size and shape of the proposed facility. EPIA in general would not approve any rooftop antenna installation when they exceed the height restriction. However, they approved design Option 2 as the height difference was determined to be insignificant and the screen treatment matched well with the existing building.

In response to Echo Park Historical Society's statement that this project would conflict with the historic nature of the building and mar its eligibility for future historic cultural monument nomination, Verizon had engaged a third party to study the historical significance of this building. Helix Environmental Planning, on November 3, 2015, conducted a Direct APE Historic Architectural Assessment and concluded that the subject property is not eligible for listing on the National Register of Historical Places. Seven aspects of integrity: location, design, setting, materials, workmanship, feeling and associations – were considered. 1650 Echo Park Ave. is not located in a cohesive neighborhood and is not otherwise associated with any important historical or cultural events or individuals. It is not of significant design and does not embody characteristics of a significant type, period, or method of construction. Helix maintains that the property is not a historic property under section 106 of the NHPA, because it is not eligible for the NR under Criterion A, B, C and D. Please find the Assessment included as Exhibit F.

Helix Environmental Planning also received a letter from the Office of Historic Preservation, Department of Parks and Recreation on December 21, 2015 that concurred that the property at 1650 Echo Park Ave is not eligible for the National Register under Criterion A because it appears not to be associated with a significant historic trend or event and under Criterion C because the property is not a good example of Beaux Arts style architecture with diminished integrity due to various exterior alterations. The letter from Julianne Polanco, State Historic Preservation Officer is attached as Exhibit G.

Verizon Wireless had reached out to the Echo Park Historical Society (EPHS) via emails and FedEx. Emails were sent to the Echo Park Historical Society on October 2nd and October 5th. In

addition, Verizon had sent a FedEx package (FedEx tracking # 774697935960) with a set of plans, photo simulations and a letter to Jim Schneeweis of EPHS with no response to any communications. No effort was made by the Echo Park Historical Society to meet with Verizon to discuss their concerns and possible resolutions before the determination.

When the zoning application was submitted at the Planning counter on February 25, 2015, a stamped envelope with project information inside was submitted for mailing to the Echo Park Neighborhood Council, a standard procedure for Wireless Applications. The Neighborhood Council was also on the mailing list to receive the Public Hearing notice. The Neighborhood Council did not reach out to Verizon with any concerns or comments.

Verizon received an email from Gary Benjamin, the original Planning Deputy of the Council Office on April 3, 2015. He stated that the council office will not support the original proposal. After we revised the proposed plans with a new preferred design, Verizon contacted the District Council Office repeatedly but didn't receive any response from Amy Ablakat on Council's position of the new screen wall. We sent our revised design and photo simulations; both option 1 and option 2, on July 15, 2015. On August 10, 2015, we emailed again for comments with no response.

The City of Los Angeles approved, through Case No. ZA 2014-4442 (CUW) (SPP) dated October 26, 2015, a similar Verizon project at 3918 Beverly Boulevard (Wilshire Planning Area) (Vermont/Western Transit Oriented District Specific Plan). This is a multi-family residential six story apartment building built in 1926. The City of Los Angeles approved the design of placing the antennas on the rooftop with very minimal screening to the antennas. This site also did not have any historical significance according to SHPO and Section 106 review.

Further, Verizon's proposed facility will address and alleviate a substantial gap in coverage and capacity demands for the community. Both federal and State policies recognize that the timely deployment of integrated wireless telecommunications facility networks has a significant beneficial economic impact in communities, California, and the nation.

2. Objection and Appeal Justification on ZA Finding No. 2 -

See the objection and information under "Objection and Appeal Justification on ZA Finding No. 1" above, which is fully incorporated by reference here.

3. Objection and Appeal Justification on ZA Finding No. 3 -

No substantial evidence supports the ZA's Finding No. 3.Verizon's proposed facility is consistent with the City General Plan, Community Plan and any applicable specific plan, including City General Plan Policy PS/F 6.2 (Improve existing wired and wireless telecommunications infrastructure).

As to the alleged "visual and historic resource impacts" referenced in Finding No. 3, see the objection and information under "Objection and Appeal Justification on ZA Finding No. 1" above, which is fully incorporated by reference here.

4. Objection and Appeal Justification on ZA Finding No. 4 -

No substantial evidence supports the ZA's Finding No. 4.

Verizon's proposed facility is consistent with all applicable setback requirements and standards relating to adjoining properties.

As to any alleged or implied visual or aesthetic impacts in Finding No. 4, see the objection and information under "Objection and Appeal Justification on ZA Finding No. 1" above, which is fully incorporated by reference here.

5. Objection and Appeal Justification on ZA Finding No. 5 -

No substantial evidence supports the ZA's Finding No. 5.

Verizon's proposed facility is consistent with all applicable setback requirements and standards relating to adjoining properties.

As to any alleged or implied visual, aesthetic or historic impacts in Finding No. 5, see the objection and information under "Objection and Appeal Justification on ZA Finding No. 1" above, which is fully incorporated by reference here.

6. Objection and Appeal Justification on ZA Finding No. 6 -

No substantial evidence supports the ZA's Finding No. 6.

See the objection and information under "Objection and Appeal Justification on ZA Finding No. 1" above, which is fully incorporated by reference here.

7. Objection and Appeal Justification on ZA Finding No. 7 -

No substantial evidence supports the ZA's Finding No. 7.

Verizon's proposed facility is to be sited at the only viable and feasible location within the applicable search ring as demonstrated by the alternative site analysis and related testimony provided to the City. Verizon's alternative site analysis for the facility complies with all regulations and standards under the City Code, State law and federal law.

8. Objection and Appeal Justification on ZA Finding No. 9 –

No substantial evidence supports the ZA's Finding No. 9 regarding the failure to adopt the Mitigated Negative Declaration for the facility. The Proposed Mitigated Negative Declaration prepared by City of Los Angeles Planning Department stated that any potential impacts will be mitigated to a less than significant level by disguising the proposed facility so as to blend into the surrounding neighborhood. Other evidence in record demonstrates that the subject building is not a significant historical resource.

Aggrieved by Decision:

After the "Small Lot Subdivision" amendment passed in 2005, developments in the Echo Park area spiked. With the new developments in the immediate vicinity such as the new tri-level single family communities on Echo Park Ave., Bancroft St. and Adamson St., the density of the neighborhood has increased, intensifying the need for coverage, increasing the demand for wireless capacity, and putting more strain on Verizon's existing service. Verizon has proven the need for wireless antennas at this location and are mandated to provide service to the customers. There were no other feasible colocations or alternate locations to locate Verizon antennas. Please find the alternate site analysis included as Exhibit H.

Authorized agent for Verizon Wireless,

Stella Shih
Site Development Specialist
714-396-0459
stella.shih@rlsusa.com

EXHIBIT B

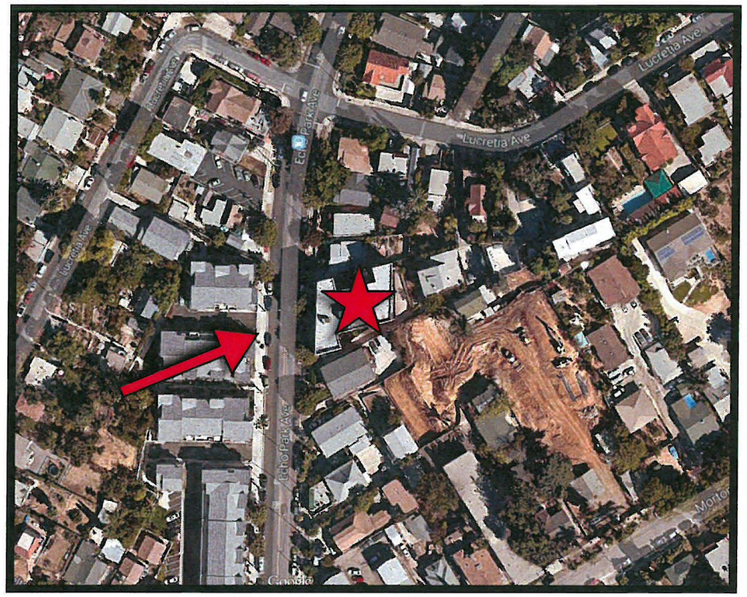
MORTON

1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123
RLS
RELIANT LAND SERVICES

verizonwireless

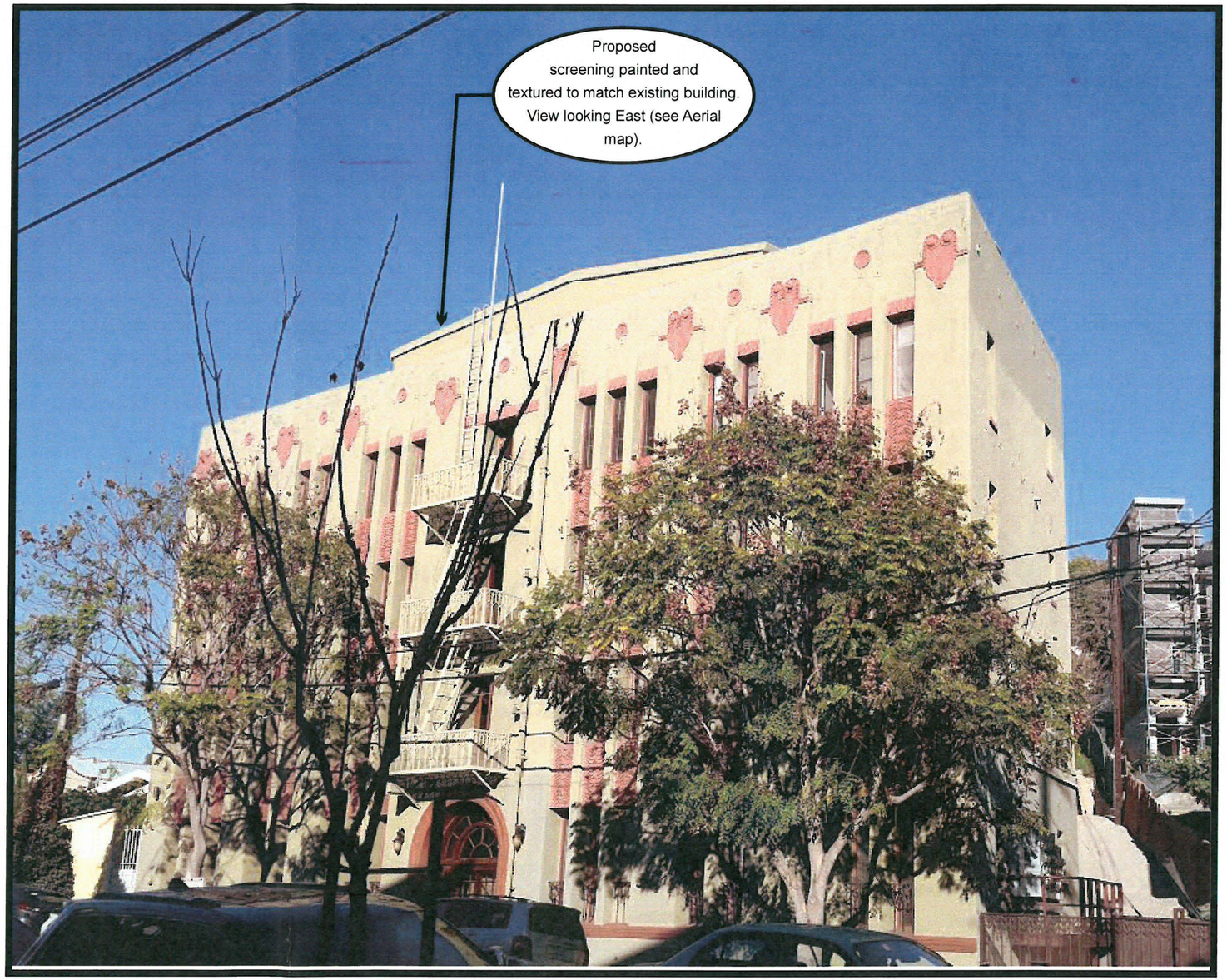
AERIAL MAP



EXISTING

PROPOSED

VIEW 1



Accuracy of photo simulation based upon information provided by project applicant. The proposed installation is an artistic representation, and not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

EXHIBIT B

MORTON

1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123
RELIANT LAND SERVICES

verizonwireless

AERIAL MAP

EXISTING

PROPOSED **VIEW 2**

Accuracy of photo simulation based upon information provided by project applicant. The proposed installation is an artistic representation, and not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

EXHIBIT A

MORTON

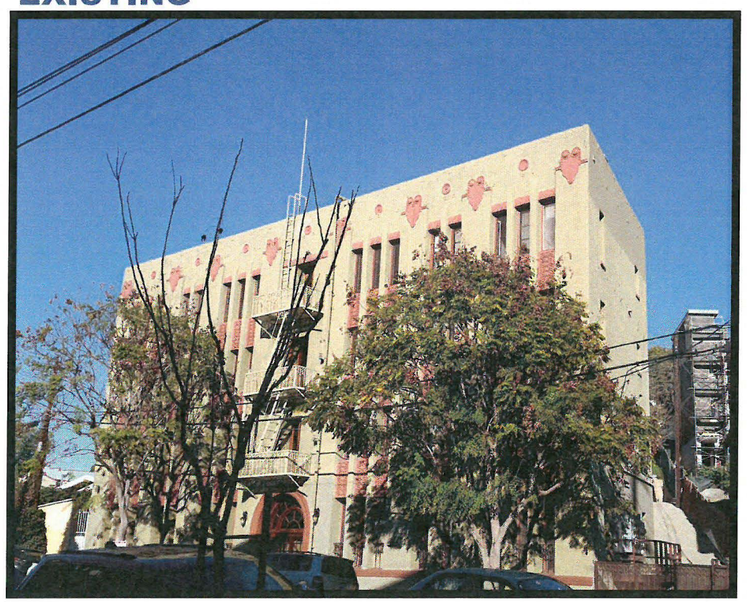
1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123
RELIANT LAND SERVICES

verizonwireless

AERIAL MAP

EXISTING



PROPOSED

VIEW 1

Accuracy of photo simulation based upon information provided by project applicant. The proposed installation is an artistic representation, and not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

verizonwireless

MORTON

1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

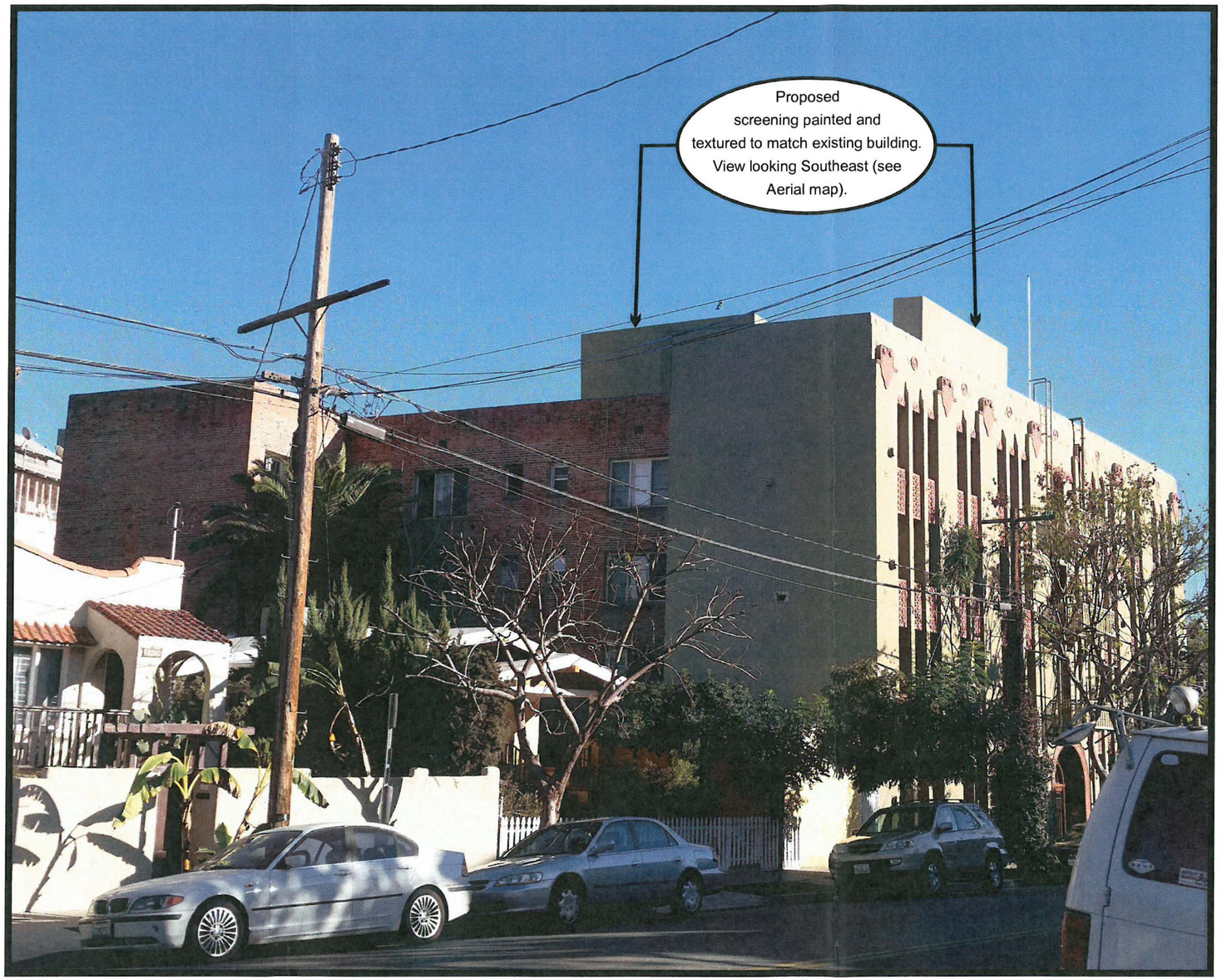
Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123

RLS
RELIANT LAND SERVICES

AERIAL MAP

EXISTING

PROPOSED **VIEW 2**



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MORTON

1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

Prepared By:
1745 W. Orangewood Avenue, Suite 103
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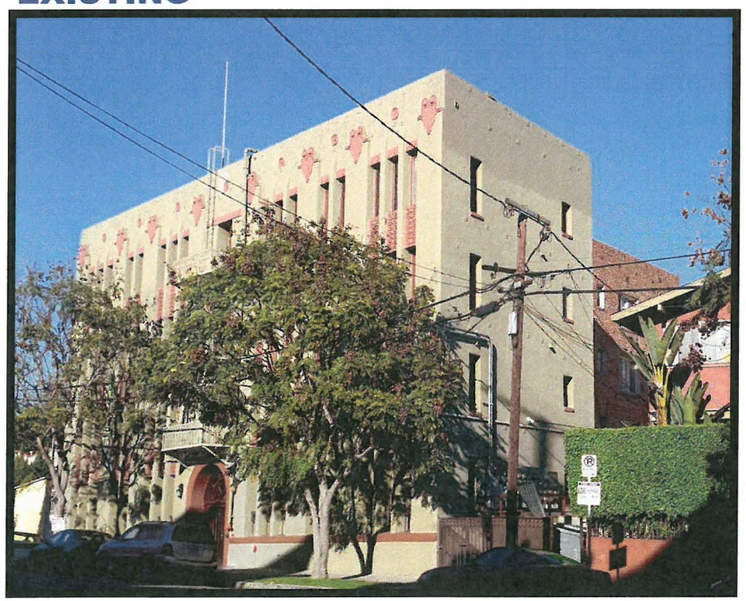
(714) 685-0123

verizonwireless

RLS
RELIANT LAND SERVICES

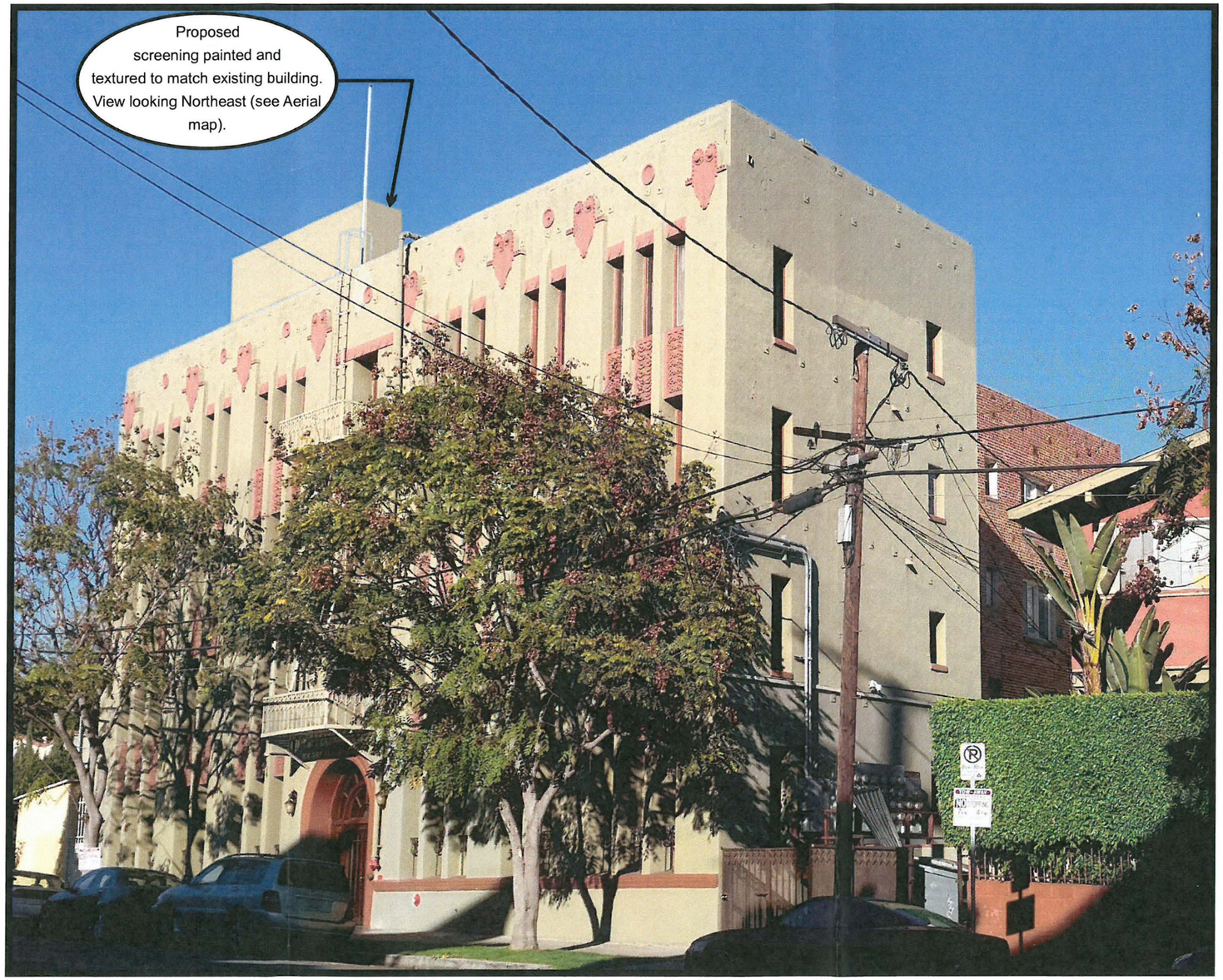
AERIAL MAP

EXISTING



PROPOSED

VIEW 3



Accuracy of photo simulation based upon information provided by project applicant. The proposed installation is an artistic representation, and not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

verizonwireless

MORTON

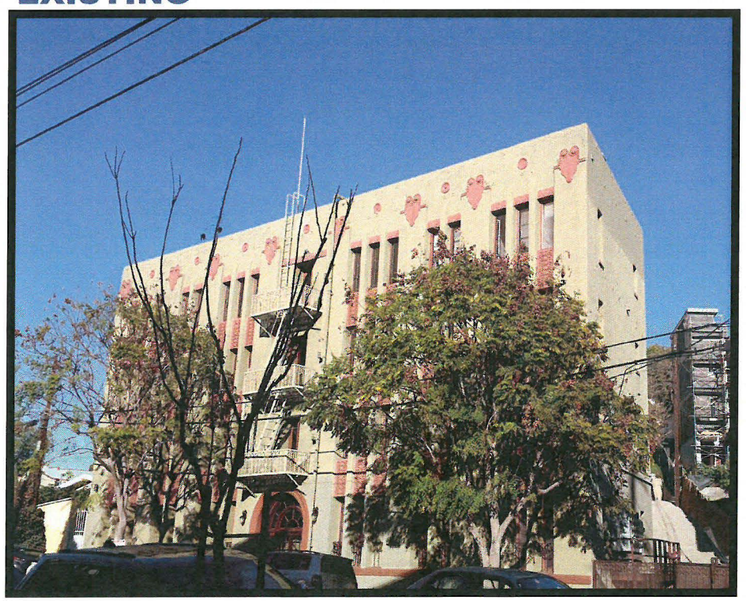
1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

EXHIBIT B

Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123
RLS RELIANT LAND SERVICES

AERIAL MAP

EXISTING



PROPOSED

VIEW 1 (Option 2)

Accuracy of photo simulation based upon information provided by project applicant. The proposed installation is an artistic representation, and not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort will be made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

EXHIBIT C

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	COUNCIL DISTRICT
City of Los Angeles	CD 13 - MITCH O'FARRELL
PROJECT TITLE	**CASE NO.**
ENV-2015-839-MND	ZA-2015-838-CUW

PROJECT LOCATION
1650 N ECHO PARK AVE

PROJECT DESCRIPTION
Pursuant to section 12.24-W,49 of the Los Angeles Municipal Code, 1) a conditional use to allow for a new wireless telecommunication facility on top of an existing 49-foot 6-inch residential building behind new 8-foot tall screening, and, 2) consideration for the proposed facility to reach a maximum height of 59-feet 6-inches in lieu of a maximum of 45 feet allowed by section 12.21.1-A.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Stella Shih
1745 Orangewood Dr. Suite 103
Orange, CA 92868

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	TITLE	TELEPHONE NUMBER
Azeen Khanmalek	City Planning Assistant	(213) 978-1336

ADDRESS	SIGNATURE (Official)	DATE
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		AUGUST 5, 2015

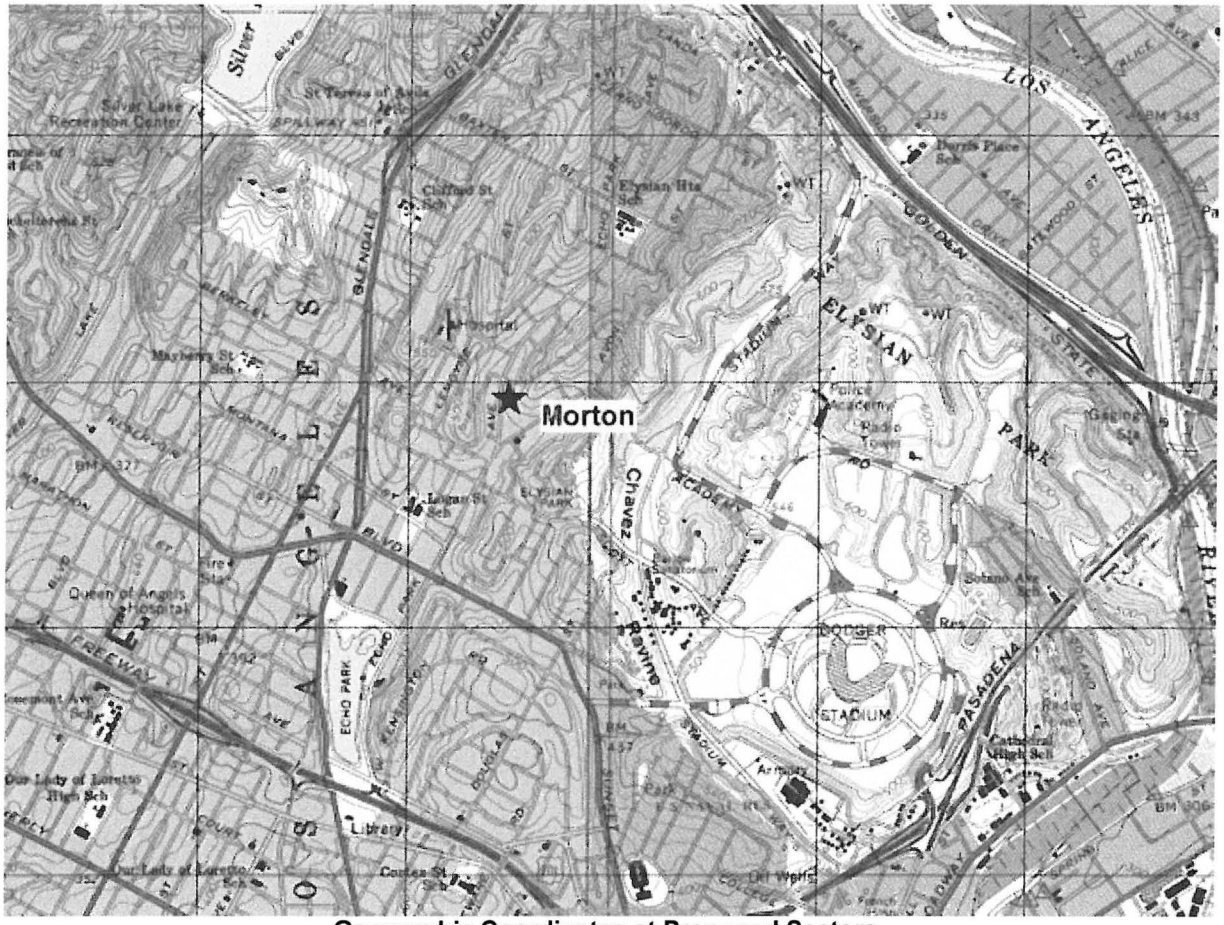
I-70. **Aesthetics (Unmanned Wireless Telecommunications Facility)**

- Environmental impacts may result to the character and aesthetics of a neighborhood by project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:
- The proposed facility shall be disguised so as to blend into the surrounding neighborhood to the satisfaction of the decision-maker. This may involve, but not be limited to, one or more of the following: painting and texturing to match the existing surroundings, disguising the installation, concealment behind screen walls, incorporation into existing structures, and/or surrounding the installation with additional landscaping.

EXHIBIT D

CAL VADA
SURVEYING INC

1-A ACCURACY CERTIFICATION
VERIZON WIRELESS



Geographic Coordinates at Proposed Sectors
(NAD 83)

	LATITUDE:	LONGITUDE:
Proposed Sector "A"	34°04' 57.66"N	118°15' 15.24"W
Proposed Sector "B"	34°04' 57.78"N	118°15' 15.56"W
Proposed Sector "C"	34°04' 57.96"N	118°15' 15.32"W

Elevations (NAVD 88)

Ground Elevation at Existing Building	443.8 Feet A.M.S.L.
Top of Existing Building	49.5 Feet A.G.L.
Top of Existing Penthouse	56.8 Feet A.G.L.
Overall Height: Top of Proposed Antennas and Screen Wall	58.5 Feet A.G.L.

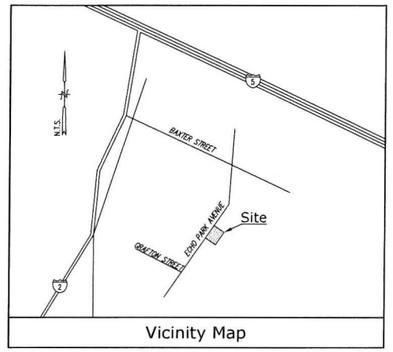
LICENSED LAND SURVEYOR
Armando D. DuPont
L.S. 7780
Exp. 12-31-15
STATE OF CALIFORNIA

Site Name: Morton
Site Address: 1650 Echo Park Ave., Los Angeles, CA 90026
Los Angeles County
Survey Date: September 11, 2014
Data Source: The California Spatial Reference Center C.O.R.S. "PKRD"

I hereby certify that the **latitude** and **longitude** shown above are accurate to within +/- 15 feet horizontally and that the **elevation** shown above are accurate to within +/- 3 feet vertically. The horizontal datum (Geographic Coordinates) is in terms of the North American Datum of 1983 (NAD 83) and is expressed in degrees (°), minutes (') and seconds ("), to the nearest hundredth of a second. The vertical datum (Elevations) is in terms of the North American Vertical Datum of 1988 (NAVD 88) and is determined to the nearest tenth of a foot.

Job No. CA14942
8/05/2015 RG

Los Angeles 411 Jenks Circle, Suite 205, Corona, CA 92880 Phone (951) 280-9960 Fax (951) 280-9746
Denver 6551 S. Revere Parkway, Suite 165, Centennial, CO 80111 Phone (720) 488-1303 Fax (720) 488-1306



Vicinity Map

Title Report

PREPARED BY: FIRST AMERICAN TITLE COMPANY
ORDER NO.: 0-SA-4727922
DATED: SEPTEMBER 4, 2014

Legal Description

REAL PROPERTY IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

LOTS 5 AND 6 OF PAULI TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 17 AT PAGE 167 OF MAPS IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

TOGETHER WITH ALL OF LOT 2 AND THAT PORTION OF LOT 1 OF TRACT 1438, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 18 PAGE 132 OF MAPS, IN THE OFFICE OF THE LOS ANGELES COUNTY RECORDER LYING WESTERLY OF A LINE BEARING NORTH 17° 48' WEST WHICH PASSES THROUGH A POINT IN THE SOUTHERLY LINE OF SAID LOT DISTANT NORTH 62° 10' EAST 22.64 FEET FROM THE MOST SOUTHERLY CORNER OF SAID LOT.

Assessor's Parcel No.

5420-028-005

Easements

3.– AN EASEMENT FOR A WALK 4 AND 8 FEET WIDE RECORDED IN BOOK 8070 PAGE 189 OF DEEDS (THE EXACT LOCATION IS NOT DISCLOSED BY THE PUBLIC RECORDS).

4.– AN EASEMENT FOR SEWER AND GENERAL PASSAGE PURPOSES, AND AS EASEMENTS FOR SEWER AND WATER CONNECTIONS RECORDED NOVEMBER 13, 1941 BOOK 18919 PAGE 103, JANUARY 9, 1945 BOOK 21681 PAGE 102, APRIL 27, 1943 BOOK 19052 PAGE 279 AND JANUARY 29, 1945 BOOK 21576 PAGE 275 ALL OFFICIAL RECORDS (THE EXACT LOCATION IS NOT DISCLOSED BY THE PUBLIC RECORDS).

(5) AN EASEMENT FOR INGRESS, EGRESS, SEWER AND GAS LINES PURPOSES RECORDED IN BOOK 24249 PAGE 246 OFFICIAL RECORDS **(PLOTTED HEREON)**.

(6) AN EASEMENT FOR WALKWAY PURPOSES AFFECTS THE SOUTHERLY 10 FEET **(PLOTTED HEREON)**.

Lease Areas & Utility Route

AS SHOWN

Basis of Bearings

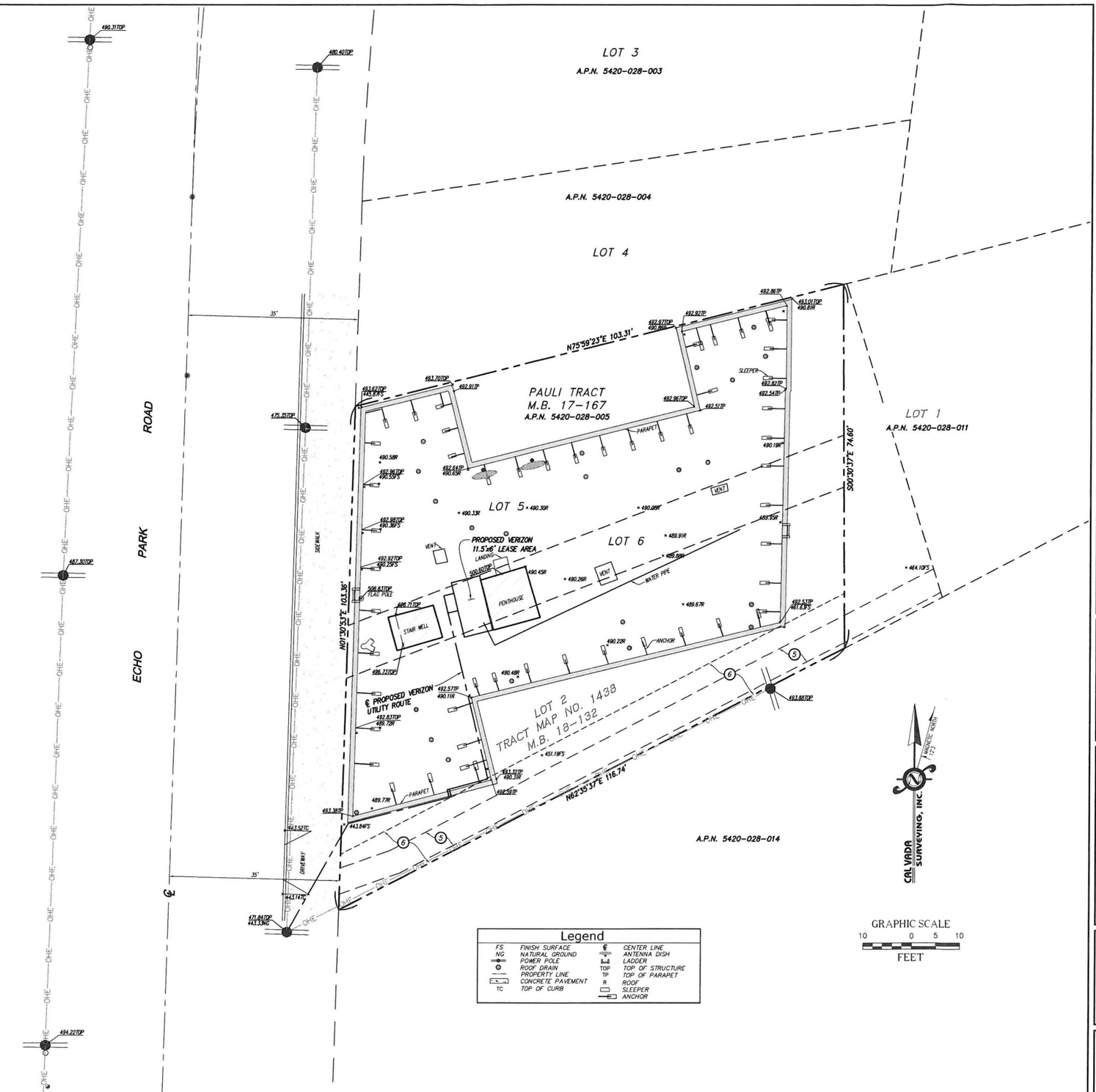
THE STATE PLANE COORDINATE SYSTEM OF 1983 (NAD 83), CALIFORNIA ZONE 5.

Bench Mark

THE CALIFORNIA SPATIAL REFERENCE CENTER C.O.R.S "PKRD", ELEVATION = 546.14 FEET (NAVD 88).

Date of Survey

SEPTEMBER 11, 2014



Legend

FS	FINISH SURFACE	℄	CENTER LINE
NG	NATURAL GROUND		ANTENNA DISH
	POWER POLE		LADDER
	ROOF DRAIN	TOP	TOP OF STRUCTURE
	PROPERTY LINE	TP	TOP OF PARAPET
	CONCRETE PAVEMENT	R	ROOF
TC	TOP OF CURB		SLEEPER
			ANCHOR

GRAPHIC SCALE
10 0 5 10
FEET

CAL VADA SURVEYING, INC.

verizon wireless
15505 SAND CANYON AVENUE
BUILDING D, 1ST FLOOR
IRVINE ,CA 92618

PLANS PREPARED BY:
RLS
RELIANT LAND SERVICES
1745 W ORANGEWOOD AVE, STE 103 ORANGE, CA 92868
WWW.RLSUSA.COM PH. (714) 685-0123 FAX (714) 453-9692

CONSULTING GROUP:
CAL VADA
SURVEYING, INC.
411 Jenks Cir., Suite 205, Corona, CA 92880
Phone: 951-280-9960 Fax: 951-280-9746
Toll Free: 800-CALVADA www.calvada.com

JOB NO. 14942

NO.	DATE:	DESCRIPTION:	BY:
	9/16/14	SUBMITTAL	BF
1	10/01/14	FINAL	HP
2	02/27/15	CLIENT COMMENTS	GBM
3	07/29/15	CLIENT COMMENTS	DG

SITE INFORMATION:

MORTON

1650 ECHO PARK AVE.
LOS ANGELES, CA 90026

LOS ANGELES COUNTY

SEAL:

LICENSED LAND SURVEYOR
Armando B. Sandoval
L.S. 7780
Exp. 12-31-15
STATE OF CALIFORNIA

SHEET TITLE:

TOPOGRAPHIC SURVEY

SHEET NUMBER: **C1**

REV: 3

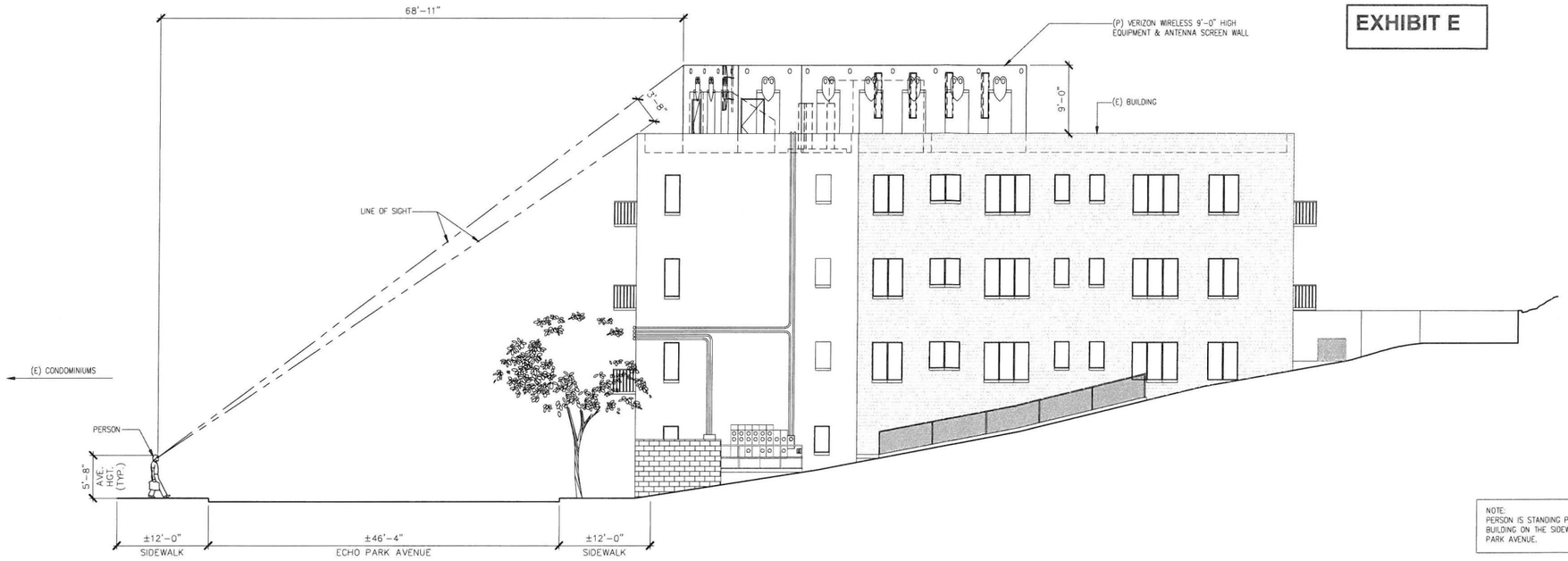
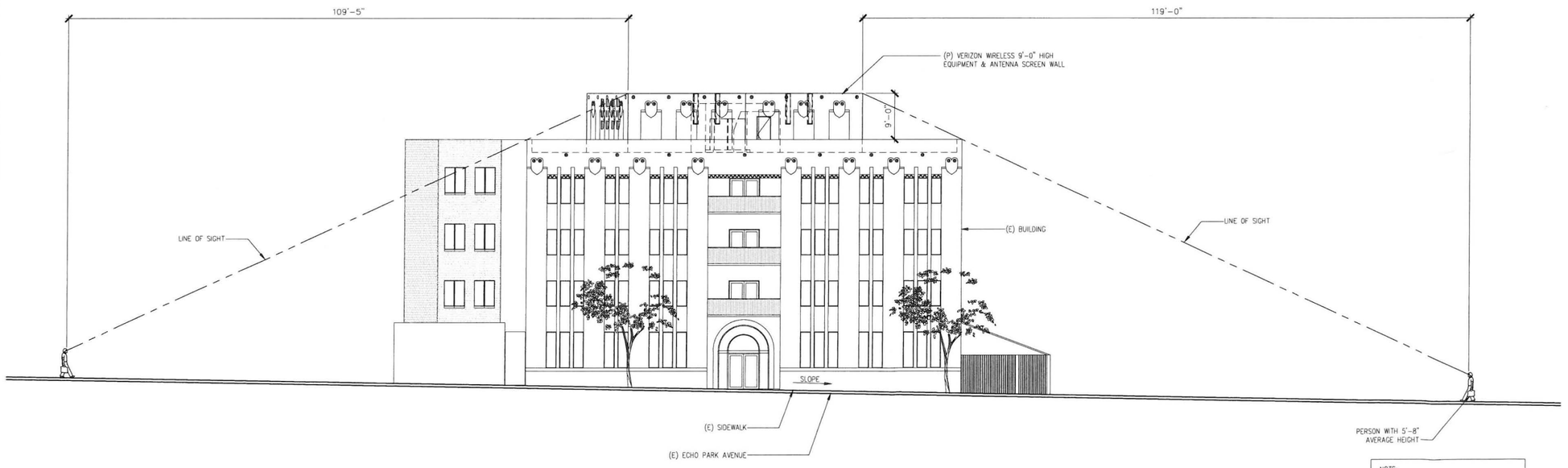


EXHIBIT E

NOTE:
PERSON IS STANDING PERPENDICULAR TO THE BUILDING ON THE SIDEWALK ACROSS ECHO PARK AVENUE.

SOUTH ELEVATION

SCALE 1/8"=1' 0" 2' 6' 14' 1



NOTE:
PERSON IS STANDING AT THE HIGHEST & LOWEST POINT OF THE EXISTING SIDEWALK.

WEST ELEVATION

SCALE 3/32"=1' 0" 2' 6' 14' 2

verizon wireless
15505 SAND CANYON AVENUE
BUILDING D, 1ST FLOOR
IRVINE, CA 92618

PLANS PREPARED BY:
RLS
RELIANT LAND SERVICES
1745 W. ORANGEWOOD AVE. STE 103 ORANGE, CA 92868
WWW.RLSUSA.COM PH. (714) 685-0123 FAX (714) 453-9892

CONSULTING GROUP:

NO.	DATE:	DESCRIPTION:	BY:
A	09/26/14	PRELIMINARY ZD	ARC
B	02/26/15	REVISED EQUIPMENT PLAN	ARC
0	03/02/15	100% ZD	ARC
1	05/21/15	REVISED ANTENNA SCREEN WALL	ARC

SITE INFORMATION:

MORTON

1650 ECHO PARK AVENUE
LOS ANGELES, CA 90026

LOS ANGELES COUNTY

SEAL:

SHEET TITLE:

LINE OF SIGHT (OPTION-2)

SHEET NUMBER: -

REV: 1

HELIX Environmental Planning, Inc.
16485 Laguna Canyon Road
Suite 200
Irvine, CA 92618
949.234.8770 **tel**
619.462.0552 **fax**
www.**helixepi**.com

HELIX Environmental Planning

EXHIBIT F

November 3, 2015

Ms. Marilyn Zenko
Terracon
4685 South Ash Avenue, Suite H-4
Tempe, AZ 85282

Subject: **Direct APE Historic Architectural Assessment for Cellco Partnership and its Controlled Affiliates Doing Business as Verizon Wireless Candidate Morton, 1650 Echo Park Avenue, Los Angeles, Los Angeles County, California.**

Dear Ms. Zenko:

At the request of Terracon, HELIX Environmental Planning, Inc. (HELIX) has conducted Direct APE Historic Architectural Assessment for Cellco Partnership and its Controlled Affiliates Doing Business as Verizon Wireless (Verizon Wireless) candidate Morton, located at 1650 Echo Park Avenue, Los Angeles, CA 90026. The lease area lies in unsectioned area of T.21S R.13W (San Bernardino Baseline and Meridian) as shown on the USGS Hollywood, CA 7.5 minute quadrangle map. Verizon Wireless proposes to install antennas and associated equipment on the roof of a building constructed in 1928. In addition, Verizon Wireless proposes to install power and telco cables from existing point of connection to equipment lease area on rooftop of building.

The purpose of the historic architectural assessment is to determine if a structure located within the direct APE of the candidate should be considered a historic property in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and its implementing regulations, 36 CFR Part 800. An historic property is any property that is listed on or is eligible for listing on the National Register of Historic Places (NR).

Historic Architectural Assessment of the Candidate Property in the Direct APE

On October 25, 2015 Architectural Historian Kathleen Crawford, M.A. assessed the candidate property located at 1650 Echo Park Avenue, Los Angeles, CA 90026. Ms. Crawford utilized the most current DPR523 form set and photographed the property from several angles. The subject property is a 28-unit, 20,899 square foot, four-story, symmetrical, irregular shaped, Beaux Arts style, multiple family building. The building is located in a residential area developed in the early 1920s in the city of Los Angeles. The building has a concrete foundation, stucco and brick exterior, and a flat roof. The front elevation is stucco and the sides of the building are exposed brick. The main façade contains the character defining features of the building. The arched main entrance is centered on the elevation and a three-flight metal fire escape rises up the façade directly above the entrance. The main entrance doors are metal and glass with an arched fanlight detail. The façade includes strong vertical detailing in the form of divisions that extend the full height of the building and provide a framework for the windows. Flat decorative panels accent the spaces between the divisions on each of the three upper floors. An evenly spaced set of "shield" type applied, flat elements alternating with small circular details are present in a row at the top of the façade, just under the roofline. The flat panels and the "shield" elements are painted gold. Windows are metal framed, double hung sash style and are placed in even rows across the facades. The building is in good condition but has undergone door and window alterations.

In regard to the seven aspects of integrity – location, design, setting, materials, workmanship, feeling and association – the c. 1928 Beaux Arts style building on this property has retained its original location. The building has not been moved. The setting, feeling, and association have not remained intact as the area surrounding the building has changed with infill structures, renovation of earlier buildings and replacement of previous buildings. The design, materials and workmanship have not been maintained as the building has been altered. The building was renovated in 1932 and the original doors and windows have been replaced in recent years with non-historic replacements. The integrity level is fair and the condition of the building is good.

We determined that the property is not located in a cohesive neighborhood and is not otherwise associated with any important historical or cultural events or individuals. The property was found not to be the work of a master. It is not of a significant design and does not embody characteristics of a significant type, period, or method of construction. The property also does not have the potential to yield, or may be likely to yield, information important to prehistory or history. HELIX maintains that the property is not a historic property under Section 106 of the NHPA, because it is not eligible for the NR under Criterion A, B, C and D.

Recommendations

In accordance with 36 CFR Part 800, HELIX has assessed the effects of this candidate on any local historic properties. Evaluation following Section 106 of the NHPA, HELIX determined that the candidate property is not eligible for the NR. When these conditions are established and following SHPO recommendations, additional mitigation is not required for Morton. Therefore, HELIX does not recommend additional mitigation prior to construction.

We at HELIX appreciate the opportunity to assist you on this project.

Sincerely,

Carrie D. Wills

Carrie D. Wills, M.A., RPA
Professional Archaeologist

Kathleen A. Crawford

Kathleen A. Crawford, M.A.
Architectural Historian

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

EXHIBIT G

December 21, 2015

Reply In Reference To: FCC_2015_1119_006

Carrie Wills
HELIX
16485 Laguna Canyon Rd., Suite 200
Irvine, CA 92618

RE: Morton, 1650 Echo Park Ave., Los Angeles, Los Angeles County, Collocation

Dear Ms. Wills:

Thank you for initiating consultation with me on behalf of the Federal Communications Commission (FCC) regarding your efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800. You do so under the terms of the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, September 2004* (PA). You are requesting I concur that the above-referenced undertaking will not affect historic properties.

The FCC's licensee or the tower company named as the applicant proposes to construct and operate an unmanned cellular communications facility at the above-referenced address. In addition to your project description, you have submitted maps, photographs, the results of a records search conducted at the regional information center, evidence of Native American consultation, and evidence of public notification.

On behalf of the FCC, the applicant's consultant has prepared DPR523 forms for the subject property and is seeking my concurrence with the eligibility determination. The applicant consultant's has evaluated the subject property built 1928 and found the subject property ineligible under National Register Criteria A and C.

I concur that the subject property at 1650 Echo Park Ave., Los Angeles, Los Angeles County is not eligible for the National Register under Criterion A because it appears not to be associated with a significant historic trend or event and under Criterion C because the property is not a good example of Beaux Arts style architecture with diminished integrity due to various exterior alterations.

Having reviewed the documentation provided, I concur that the undertaking as described will not affect historic properties.

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have additional future responsibilities for this undertaking under 36 CFR Part 800. Should you encounter cultural artifacts during ground disturbing activities please halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts.

I look forward to continuing our consultation. If you have any questions, please contact Michelle C. Messinger, State Historian II of my staff at (916)445-7005 or at Michelle.Messinger@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

EXHIBIT H

Existing Wireless Facilities: Co-location efforts

The coverage objective is to provide coverage along Van Nuys Blvd.

1. 1717 Glendale Blvd.: The monopole is outside of search ring. Verizon is already present at this location.

2. 1927 Reservoir St.: This rooftop site is outside of search ring.

3. 1910 W. Sunset Blvd: This rooftop façade mount is outside of search ring.

4. 1830 W. Sunset Blvd.: The rooftop site is outside of search ring.

5. 1525 N. Alvarado St., Rooftop site is out of search ring, very close to existing Verizon location at 1717 Glendale Blvd.

Verizon Wireless also researched other properties within the area.

6. 1650 Lucretia Ave.: The existing roof will not be able to support cell site.

7. 1815 Morton Ave.: The landlord rejected Verizon's proposal.

8. 1615 Echo Park Ave.: Outside of search ring and ownership of the property is complicated and unclear.

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

DEPARTMENT OF
CITY PLANNING
MICHAEL J. LOGRANDE
DIRECTOR

OFFICE OF
ZONING ADMINISTRATION
200 N. SPRING STREET, 7TH FLOOR
LOS ANGELES, CA 90012
(213) 978-1318
FAX: (213) 978-1334
www.planning.lacity.org

February 4, 2016

Verizon Wireless (A)
15505 Sand Canyon Avenue, Building D
Irvine, CA 91618

1650 Echo Park, LLC (O)
1650 Echo Park Avenue
Los Angeles, CA 90026

Stella Shih (R)
Reliant Land Services
1745 Orangewood Avenue, Suite 103
Orange, CA 92868

CASE NO. ZA 2015-0838(CUW)
CONDITIONAL USE
1640 North Echo Park Avenue
Silver Lake-Echo Park-Elysian Valley
Planning Area
Zone : RD1.5-1VL
D. M. : 142-5A209
C. D. : 13
CEQA : ENV-2015-839-MND
Legal Description: Lots 5 and 6, Pauli Tract, and Lot 2, Tract 1438

Pursuant to Los Angeles Municipal Code Section 12.24-W,49, I hereby DENY:

a Conditional Use to permit the installation of twelve (12) new panel antennas, twelve (12) new remote radio units, one (1) microwave dish, and two (2) equipment cabinets behind new screening on the rooftop of an existing 49-foot 6-inch tall building, and

Pursuant to Section 12.24-F of the Los Angeles Municipal Code, I hereby DENY:

Consideration for the proposed new wireless facility to reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed by Section 12.21.1-A of the Code.

FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the plans submitted therewith, the report of the Zoning Analyst thereon, the statements made at the public hearing on October 1, 2015, all of which are by reference made a part hereof, as well as knowledge of the property and surrounding district, I find that the requirements for authorizing a conditional use permit under the provisions of Section 12.24-W have not been established by the following facts:

BACKGROUND

The subject property is an approximately 9,049 square-foot, irregularly shaped, sloping, parcel of land, made up of three contiguously owned lots tied together to form one parcel. The site is currently developed with a 20,998 square-foot, four-story residential building. The roof of the building reaches a height of 47 feet 6 while the building parapet reaches 49 feet 6 inches. The site slopes down from the rear of the property, on the east, down to front of the property, adjacent to Echo Park Boulevard. The property has a frontage of approximately 103 feet on Echo Park Boulevard, while the rear of the property has a width of approximately 75 feet. The northern edge of the property has a depth of approximately 103 feet, and the southern edge has a depth of approximately 117 feet.

The applicant is requesting a Conditional Use to permit the installation of twelve (12) new panel antennas, twelve (12) new remote radio units, one (1) microwave dish, and two (2) equipment cabinets behind new 9-foot tall screening on the rooftop of an existing 49-foot, 6-inch tall building, as well as consideration for the proposed new wireless facility to reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed.

Adjoining properties to the north are zoned RD1.5-1VL and are developed with single-family dwellings.

Adjoining properties to the south are zoned RD1.5-1VL and are developed with one- and two-story multi-family residential dwellings.

Adjoining properties to the east are [Q]C2-1VL and are developed with low-density multi-family dwellings.

Adjoining properties to the west are zoned R2-1VL and are developed with single-family dwellings.

North Echo Park Avenue, adjacent to the subject site to the west, is a Collector Street dedicated to a width of 70 feet, and is improved with a paved roadway of approximately 46 feet in width, concrete curb, gutter and sidewalk.

Lucretia Avenue, in the vicinity of the subject site to the north, is a Standard Local Street dedicated to a width of 60 feet, and is improved with a paved roadway of approximately 24 feet in width, concrete curb, gutter and sidewalk.

Previous zoning related actions in the vicinity of the subject property include:

> Case No. ZA 2012-1883(ZAA) – On May 8, 2013, the Zoning Administrator approved a Zoning Administrator's Determination to allow for varying reduced front yards from 0 feet to 5 feet in lieu of the required 15 feet, to permit 0-foot side yard in lieu of the required 6 feet, to permit 0-foot rear yards in lieu of the required 15 feet, and to permit 0-foot building separation in lieu of the required 12 feet, in conjunction with a 5-lot Small Lot Subdivision and the subsequent construction, use, and maintenance of 5 single family dwellings in the [Q]C2-1VL and RD2-1VL Zones located at 1516 Echo Park Avenue.

Case No. ZA 2009-0313(ZAA) – On January 21, 2010, the Zoning Administrator approved a Zoning Administrator's Adjustment to allow for the construction, use, and maintenance of a new, 440 square foot detached garage located within 35 feet of the front property line, in lieu of the required 5 feet, in the R2-1VL Zone located at 121 North Bruce Court.

Case No. ZA 2008-1598(ZAD) – On November 6, 2008, the Zoning Administrator approved a Zoning Administrator's Determination to permit the continued use and maintenance of an existing combination redwood and concrete fence located within the front yard setback and observing a variable 5-foot 6-inch to 8-foot fence height in lieu of the maximum allowed 3-foot 6-inch fence height allowed by Section 12.21-C,1(g) of the Code on a site developed with a residential duplex in the RD3-1XL zone located at 1811 Lucretia Avenue.

PUBLIC HEARING

A public hearing was conducted in City Hall on October 1, 2015. In attendance was the applicant's representative. Additionally, five correspondences were received from various entities and individuals in opposition and one expressing opposition to the proposed installation, but favoring a modified option.

IN SUPPORT

- The original screening was not attractive as it was proposed.
- The revised treatment was centered on the length of the façade, and will be treated to match the existing building details.
- The site was chosen to fill a gap in coverage as shown on the propagation maps.
- Five sites were considered for co-location, but wouldn't fill the gap adequately.
- Three other sites were considered for new installation, but the property owners weren't interested or the roof couldn't accommodate an installation structurally.
- In their letter dated September 3, 2015, The Echo Park Improvement Association (EPIA) supports their proposal. The EPIA does not support rooftop cell antennae when they exceed the height restriction of the prevailing zoning. However, Option 2 as presented to them was close to the height of the elevator shaft, within 1 to 2 feet, and they determined that the difference in height was insignificant. Furthermore, they thought that the esthetic treatment (screen) matched well with the existing building.

IN OPPOSITION

September 28, 2015 – Letter from the Echo Park Historical Society (EPHS) indicating that the EPHS objects to the approval of the cellular installation because the following reasons:

- The existing building is over the approved height for the planning area.
- The additional height of the enclosure will increase further above the approved 45 foot Height Limit for the area to 59 feet 6 inches, nearly 15 feet over the height that is allowed.

- The addition of the cellular installation will conflict with the historic nature of the building and mar its eligibility for future historic cultural monument nomination.
- The installation is in conflict with the city's policy of co-locating antennas.
- The EPHS respectfully requests a denial of this application and to maintain the spirit of the Silver Lake-Echo Park-Elysian Valley Community Plan, and the maximum height of 45 feet.

September 28, 2015 – E-mail from Regina LeBorg a resident within the 500-foot radius of the proposal:

- She opposes the proposed Wireless Communication Facility installation on top of this building on the basis of aesthetics and intensified magnetic/electronic resonance.

September 29, 2015 – Letter from Matthew Sharp, a neighbor, opposes the installation of cellular equipment unless modified and is concerned about:

- The added walls screening the equipment, reaching 59 feet 8 inches will be too visible to the neighbors.
- He recommends that the installation be set back further in a narrow band more centrally located on the roof to minimize the visual impact and reduce sightlines.
- He asserts that the environmental review for this proposal is flawed with regard to the proposed height and there not being a significant impact to the visual environment to the adjacent properties.
- He points out that the project elevations incorrectly represent the height of adjacent structure, and minimizes the scale of the proposal.
- He asserts that the project representative incorrectly states that the project was presented to the neighborhood council, and received support after aesthetic modifications were made.
- The project was never shown to the Echo Park Neighborhood Council, nor did the project receive EPNC support. The project was shown to the Echo Park Improvement Association and not to the Neighborhood Council, and they only gave a qualified letter of support.
- Mr. Sharp suggests that the installation be reconfigured to be placed 8 to 9 feet back from all edges of the building to more effectively mitigate the visual and aesthetic impacts of the proposal.
- He acknowledges the need for stronger telecommunications signals in the Echo Park Community, and accepts the applicant's assertion that this is the right place for a new installation. He suggests that with appropriate modifications, this proposal could minimize visual impacts.

September 29, 2015 – E-mail from Amy Ablakat, Planning Deputy in Council District 13, expressed that their office had received public concern regarding this proposal, including:

- Proposed scale, visual impacts, inconsistent walls and screening neighboring properties, especially relating to height restrictions.
- Improper notification/posting on-site of the upcoming public hearing.

- Misrepresentation of the height and shadowing impacts.
- The project was not presented to the Echo Park Neighborhood Council.

The matter was taken under advisement to allow the applicant to review their plans and proposal with the Echo Park Neighborhood Council and the Echo Park Historical Society. The advisement period was to allow for community outreach and for the community to submit additional comments.

During the advisement period, the applicant's representative emailed, and sent a letter and drawings to the Echo Park Historic Society via FedEx, but did not receive any response. The representative submitted no evidence that they reached out to the Neighborhood Council, and the applicant did not obtain any input, review, support or opposition from the Neighborhood Council.

During the advisement period, the Zoning Administrator did research into SurveyLA, and any historical status of the subject property. The subject property was built in 1928 and has been identified as an "Excellent, intact example of an Art Deco style apartment house exhibiting quality of design. One of very few examples of the style in the area." The California State Office of Historic Preservation has developed California Historical Resource (CHR) Status Codes as a standardized system for classifying historical resources in the State's Historic Resources Inventory. These Status Codes are used statewide and are assigned to properties and districts by field surveyors as part of the survey process and when they are designated. These Status Codes are used in ZIMAS and HistoricPlacesLA. The property appears to be eligible for National Register as an individual property through SurveyLA or other survey evaluation (Status Code "3S"); also, the property appears to be eligible for California Register as an individual property through SurveyLA or other survey evaluation (Status Code "3CS"); additionally, the property appears to be individually eligible for local listing or designation through SurveyLA or other survey evaluation (Status Code "5S3"). Further, for the purposes of the California Environmental Quality Act (CEQA), designated or eligible resources are considered "Historical Resources (PRC15064.5(a).

BASIS FOR CONDITIONAL USE PERMITS

A particular type of development is subject to the conditional use process because it has been determined that such use of property should not be permitted by right in a particular zone. All uses requiring a conditional use permit from the Zoning Administrator are located within Section 12.24-W of the Los Angeles Municipal Code. In order for a wireless telecommunications facility to be authorized, certain designated findings have to be made. In these cases, there are additional findings in lieu of the standard findings for most other conditional use categories.

FINDINGS

Following (highlighted) is a delineation of the findings and the application of the relevant facts to same:

1. **The project will not enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

The subject property is an approximately 9,049 square-foot, irregularly-shaped, sloping, parcel of land, made up of three contiguously owned lots tied together to form one parcel. The site is currently developed with a 20,998 square-foot, four-story residential building. The roof of the building reaches a height of 47 feet 6 inches, while the building parapet reaches 49 feet 6 inches. Adjoining properties to the north are zoned RD1.5-1VL and are developed with single-family dwellings. Surrounding uses are residential multi-family developments ranging in height and density. Adjoining properties to the south are zoned RD1.5-1VL and are developed with one- and two-story multi-family residential dwellings. Adjoining properties to the east are [Q]C2-1VL and are developed with low-density multi-family dwellings. Adjoining properties to the west are zoned R2-1VL and are developed with single-family dwellings.

The applicant proposes the installation 12 panel antennas, 12 remote radio units (RRU), 1 microwave dish, and 2 equipment cabinets behind new 9-foot tall screening on the rooftop of an existing, four-story building. As cellular telephone use and mobility technology has increased, access to mobile networks have become an integral part of our economy. There are few other wireless facilities in the area, leading to a lack of adequate cellular service in the community. The proposed project, by increasing access to mobile networks, and allowing for faster cellular service, would provide a beneficial service to the community, and to the region.

The request is based on a need to meet a coverage gap that the applicant indicates is shown on the propagation maps submitted with the application. The area is generally bounded by Glendale Boulevard on the west, Sunset Boulevard on the south, Morton Avenue on the east, and Avalon Street on the north. This area also represents the limited search area that the applicant is considering for the new facility. The applicant indicates that in their efforts to fill the coverage gap, they looked at five existing sites for co-location. However, each of the five sites were either outside their search ring, or too close to existing Verizon locations. Additionally, three other sites were considered, but each was either unable to accommodate the installation because the roof couldn't support the equipment or the landlord rejected the applicant's proposal, or the site was outside the search ring.

The applicant has made efforts to address aesthetic concerns by redesigning the equipment screen to match the existing building details and color. The proposal was shown to the Echo Park Improvement Association, and they voted to approve "Option 2", which is the redesigned screen which mimics the buildings art deco features and is painted to match the building. It was shown to the Echo Park Historical Society (EPHS), and they wrote a letter dated September 28, 2015 opposing the project based on the historic eligibility of the existing art deco apartment building. The EPHS state in their letter, "The addition of the cellular installation will conflict with the historic nature of the building and mar it's eligibility

for future historic cultural monument nomination." The design was never presented to the Echo Park Neighborhood Council.

The roof of the building reaches a height of 47 feet 6 inches, while the building parapet reaches 49 feet 6 inches. The applicant is requesting a Conditional Use to permit the installation of a wireless telecommunications facility behind new 9-foot tall screening on the rooftop of an existing 49-foot 6-inch tall building. The new wireless facility as proposed would reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed. The applicant has made an effort to redesign the screening to match the building façade treatment. However, the prominent profile of the building results in a rooftop which would have a very visible addition of mass that was non-existent previously. The existing building was addressed in SurveyLA, and was identified as an, "Excellent, intact example of an Art Deco style apartment house exhibiting quality of design. One of very few examples of the style in the area." As this building is "intact" as to its Art Deco style, any additional structure on its roof would create an impact

It can be argued that the request could improve coverage and meet capacity needs and as such would provide a service beneficial to the community and allow for improved emergency communication. However, the desirability for such enhanced service must be measured in terms of the impact the facility has on aesthetics and historical resources given the existing physical context of the surroundings. In this instance, both aesthetic and historic resource impacts associated with additional massing on a prominent, building rooftop have not been mitigated to a level that does not adversely impact the built environment.

2. **The project's location, size, height, operations and other significant features will not be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.**

The applicant proposes the installation 12 panel antennas, 12 remote radio units (RRU), 1 microwave dish, and 2 equipment cabinets behind new 9-foot tall screening on the rooftop of an existing, four-story building. As noted, aesthetics is a prime consideration associated with the installation of wireless facilities, whether it be on a new building or one that dates back to 1928. The use of screening features and other stealth alternatives is a design approach that is often a viable means to minimize visual impacts. However, these typically represent more successful design features when there is no additional massing created, or when the subject building is not an historic resource. When juxtaposed against the existing development, such impacts become more noteworthy given the visibility of the building, and the identification of the site as having historic resource eligibility status. Concerns regarding the visibility of the installation and compatibility of it with the building's architectural integrity were also noted by area residents, the Echo Park Historical Society, and the Office of the Thirteenth Council District.

Any considerations regarding health are not within the jurisdiction of the City and are preempted from consideration as the basis for the rendering of a decision by the

federal government. Section 704 of Title 7 of the Federal Telecommunications Act of 1996, effective February 8, 1996, contains the following language:

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

3. **The project does not substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan and any applicable specific plan.**

Both the Silver Lake-Echo Park-Elysian Valley Community Plan and the General Plan designate the subject property as Low Medium II Multi-Family Residential. While neither Plan specifically designates uses permitted by conditional use or associated plan approvals, Los Angeles Municipal Code Section 12.24-W,49 permits the requested use within the zones corresponding to this land use designation.

The overall goal of the Plan is to promote an arrangement of land uses, circulation and services which will encourage and contribute to the economic, social, physical health, safety, welfare and convenience of the people who live and work in the plan area, and to guide the development of the district to meet existing and anticipated needs and conditions. Construction of the new facility appears likely to create adverse visual and historic resource impacts to the subject site and surrounding properties, and as such, is not consistent with the spirit, intent and objectives of the General Plan. As such, the finding in the affirmative cannot be made.

4. **The site is of a size and shape sufficient to provide the setback requirements as set forth in Section 12.21-A,20(a)(2) of the Municipal Code as to those portions of the property abutting residential or public uses.**

The screened rooftop wireless telecommunication facility is proposed to be set back a variable depth of approximately 5 feet to 12 feet from the western edge of the building (front façade), and approximately 5 feet from the north and south edges of the building. The proposed screens would extend more than 10 feet above the roof. The roof is at 47 feet 6 inches, and the top of the parapet wall is at 49 feet 6 inches. The top of the screening is at 58 feet 6 inches. The proposed screens would not extend more than 9 feet above the top of the building parapet

5. **The required setbacks shall be improved to meet the screening and landscaping standards of Section 12.21-A,20(a)(5) and (6) of the Municipal Code to the extent possible within the area provided.**

The antennas and equipment, as proposed would be located on the rooftop. Antennas would be located behind rooftop screening designed to match with the building's architecture. However, the added bulk of the screened sectors creates a massing effect that results in visual impacts. Further, the proposed installation and

screening do not comply with the Secretary of the Interior Standards for historical resources. There are no required landscaping standards for the antennas as these are proposed for the rooftop and not a freestanding monopole.

6. **The visual impact standard of Section 12.21-A,20(a)(4) of the Municipal Code is not met.**

   The intent of the requirements is to minimize the visual impacts of the installation from public view areas. In this instance, the proposed facility will consist of antenna sectors to be located on the roof of the four-story historic resource (the subject apartment building) which is prominent, and which results in the addition of a visible 9-foot high rooftop structure that contribute to an adverse effect.

7. **An effort in good faith was made by the applicant to locate on existing sites or other facilities in the community in accordance with the guidelines of the City's cellular ordinance.**

   The City's Wireless Telecommunications Facility Ordinance strongly encourages the location of new wireless facilities on existing approved structures or sites. The applicant indicated that no co-location opportunities which were viable existed in the area and also noted that other alternative sites were not feasible. According to Propagation maps provided by the applicant, there are few wireless facilities available in the immediate area. Moreover, City records indicate that there is only one approved wireless facilities within 1,000 feet of the subject site.

ADDITIONAL MANDATORY FINDINGS

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone X, areas outside of the flood zone.

9. On August 5, 2015, 2015, the Department of City Planning issued a Mitigated Negative Declaration (ENV 2015-839-MND) for the proposed project. On the basis of the whole of the record, including any comments received, the lead agency found that with imposition of the mitigation measures described in the MND (and identified in this determination), there is no substantial evidence that the proposed project will have a significant effect on the environment. I do not adopt said action as the mitigation measures do not sufficiently address visual, aesthetic and historic resource impacts associated with the request. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Planning Department in Room 750, 200 North Spring Street.

APPEAL PERIOD - EFFECTIVE DATE

The Zoning Administrator's determination in this matter will become effective after FEBRUARY 19, 2016, unless an appeal therefrom is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and

in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of the Zoning Administrator's action, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. **Forms are available on-line at http://cityplanning.lacity.org**. Public offices are located at:

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Inquiries regarding this matter shall be directed to Azeen Khanmalek, Planning Staff for the Office of Zoning Administration at (213) 978-1336.

DAVID S. WEINTRAUB
Associate Zoning Administrator

DSW:AK:lmc

cc: Councilmember Mitch O'Farrell
Thirteenth District
Adjoining Property Owners

DETERMINATION LETTER

LINN K. WYATT
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS
JACK CHIANG
HENRY CHU
LOURDES GREEN
JAE H. KIM
HARLES J. RAUSCH, JR.
JIM TOKUNAGA
FERNANDO TOVAR
DAVID S. WEINTRAUB
MAYA E. ZAITZEVSKY

CITY OF LOS ANGELES
CALIFORNIA

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February 4, 2016

Verizon Wireless (A)
15505 Sand Canyon Avenue, Building D
Irvine, CA 91618

1650 Echo Park, LLC (O)
1650 Echo Park Avenue
Los Angeles, CA 90026

Stella Shih (R)
Reliant Land Services
1745 Orangewood Avenue, Suite 103
Orange, CA 92868

CASE NO. ZA 2015-0838(CUW)
CONDITIONAL USE
1640 North Echo Park Avenue
Silver Lake-Echo Park-Elysian Valley
Planning Area
Zone : RD1.5-1VL
D. M. : 142-5A209
C. D. : 13
CEQA : ENV-2015-839-MND
Legal Description: Lots 5 and 6, Pauli Tract, and Lot 2, Tract 1438

Pursuant to Los Angeles Municipal Code Section 12.24-W,49, I hereby DENY:

a Conditional Use to permit the installation of twelve (12) new panel antennas, twelve (12) new remote radio units, one (1) microwave dish, and two (2) equipment cabinets behind new screening on the rooftop of an existing 49-foot 6-inch tall building, and

Pursuant to Section 12.24-F of the Los Angeles Municipal Code, I hereby DENY:

Consideration for the proposed new wireless facility to reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed by Section 12.21.1-A of the Code.

FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the plans submitted therewith, the report of the Zoning Analyst thereon, the statements made at the public hearing on October 1, 2015, all of which are by reference made a part hereof, as well as knowledge of the property and surrounding district, I find that the requirements for authorizing a conditional use permit under the provisions of Section 12.24-W have not been established by the following facts:

BACKGROUND

The subject property is an approximately 9,049 square-foot, irregularly shaped, sloping, parcel of land, made up of three contiguously owned lots tied together to form one parcel. The site is currently developed with a 20,998 square-foot, four-story residential building. The roof of the building reaches a height of 47 feet 6 while the building parapet reaches 49 feet 6 inches. The site slopes down from the rear of the property, on the east, down to front of the property, adjacent to Echo Park Boulevard. The property has a frontage of approximately 103 feet on Echo Park Boulevard, while the rear of the property has a width of approximately 75 feet. The northern edge of the property has a depth of approximately 103 feet, and the southern edge has a depth of approximately 117 feet.

The applicant is requesting a Conditional Use to permit the installation of twelve (12) new panel antennas, twelve (12) new remote radio units, one (1) microwave dish, and two (2) equipment cabinets behind new 9-foot tall screening on the rooftop of an existing 49-foot, 6-inch tall building, as well as consideration for the proposed new wireless facility to reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed.

Adjoining properties to the north are zoned RD1.5-1VL and are developed with single-family dwellings.

Adjoining properties to the south are zoned RD1.5-1VL and are developed with one- and two-story multi-family residential dwellings.

Adjoining properties to the east are [Q]C2-1VL and are developed with low-density multi-family dwellings.

Adjoining properties to the west are zoned R2-1VL and are developed with single-family dwellings.

North Echo Park Avenue, adjacent to the subject site to the west, is a Collector Street dedicated to a width of 70 feet, and is improved with a paved roadway of approximately 46 feet in width, concrete curb, gutter and sidewalk.

Lucretia Avenue, in the vicinity of the subject site to the north, is a Standard Local Street dedicated to a width of 60 feet, and is improved with a paved roadway of approximately 24 feet in width, concrete curb, gutter and sidewalk.

Previous zoning related actions in the vicinity of the subject property include:

> Case No. ZA 2012-1883(ZAA) – On May 8, 2013, the Zoning Administrator approved a Zoning Administrator's Determination to allow for varying reduced front yards from 0 feet to 5 feet in lieu of the required 15 feet, to permit 0-foot side yard in lieu of the required 6 feet, to permit 0-foot rear yards in lieu of the required 15 feet, and to permit 0-foot building separation in lieu of the required 12 feet, in conjunction with a 5-lot Small Lot Subdivision and the subsequent construction, use, and maintenance of 5 single family dwellings in the [Q]C2-1VL and RD2-1VL Zones located at 1516 Echo Park Avenue.

Case No. ZA 2009-0313(ZAA) – On January 21, 2010, the Zoning Administrator approved a Zoning Administrator's Adjustment to allow for the construction, use, and maintenance of a new, 440 square foot detached garage located within 35 feet of the front property line, in lieu of the required 5 feet, in the R2-1VL Zone located at 121 North Bruce Court.

Case No. ZA 2008-1598(ZAD) – On November 6, 2008, the Zoning Administrator approved a Zoning Administrator's Determination to permit the continued use and maintenance of an existing combination redwood and concrete fence located within the front yard setback and observing a variable 5-foot 6-inch to 8-foot fence height in lieu of the maximum allowed 3-foot 6-inch fence height allowed by Section 12.21-C,1(g) of the Code on a site developed with a residential duplex in the RD3-1XL zone located at 1811 Lucretia Avenue.

PUBLIC HEARING

A public hearing was conducted in City Hall on October 1, 2015. In attendance was the applicant's representative. Additionally, five correspondences were received from various entities and individuals in opposition and one expressing opposition to the proposed installation, but favoring a modified option.

IN SUPPORT

- The original screening was not attractive as it was proposed.
- The revised treatment was centered on the length of the façade, and will be treated to match the existing building details.
- The site was chosen to fill a gap in coverage as shown on the propagation maps.
- Five sites were considered for co-location, but wouldn't fill the gap adequately.
- Three other sites were considered for new installation, but the property owners weren't interested or the roof couldn't accommodate an installation structurally.
- In their letter dated September 3, 2015, The Echo Park Improvement Association (EPIA) supports their proposal. The EPIA does not support rooftop cell antennae when they exceed the height restriction of the prevailing zoning. However, Option 2 as presented to them was close to the height of the elevator shaft, within 1 to 2 feet, and they determined that the difference in height was insignificant. Furthermore, they thought that the esthetic treatment (screen) matched well with the existing building.

IN OPPOSITION

September 28, 2015 – Letter from the Echo Park Historical Society (EPHS) indicating that the EPHS objects to the approval of the cellular installation because the following reasons:

- The existing building is over the approved height for the planning area.
- The additional height of the enclosure will increase further above the approved 45 foot Height Limit for the area to 59 feet 6 inches, nearly 15 feet over the height that is allowed.

- The addition of the cellular installation will conflict with the historic nature of the building and mar its eligibility for future historic cultural monument nomination.
- The installation is in conflict with the city's policy of co-locating antennas.
- The EPHS respectfully requests a denial of this application and to maintain the spirit of the Silver Lake-Echo Park-Elysian Valley Community Plan, and the maximum height of 45 feet.

September 28, 2015 – E-mail from Regina LeBorg a resident within the 500-foot radius of the proposal:

- She opposes the proposed Wireless Communication Facility installation on top of this building on the basis of aesthetics and intensified magnetic/electronic resonance.

September 29, 2015 – Letter from Matthew Sharp, a neighbor, opposes the installation of cellular equipment unless modified and is concerned about:

- The added walls screening the equipment, reaching 59 feet 8 inches will be too visible to the neighbors.
- He recommends that the installation be set back further in a narrow band more centrally located on the roof to minimize the visual impact and reduce sightlines.
- He asserts that the environmental review for this proposal is flawed with regard to the proposed height and there not being a significant impact to the visual environment to the adjacent properties.
- He points out that the project elevations incorrectly represent the height of adjacent structure, and minimizes the scale of the proposal.
- He asserts that the project representative incorrectly states that the project was presented to the neighborhood council, and received support after aesthetic modifications were made.
- The project was never shown to the Echo Park Neighborhood Council, nor did the project receive EPNC support. The project was shown to the Echo Park Improvement Association and not to the Neighborhood Council, and they only gave a qualified letter of support.
- Mr. Sharp suggests that the installation be reconfigured to be placed 8 to 9 feet back from all edges of the building to more effectively mitigate the visual and aesthetic impacts of the proposal.
- He acknowledges the need for stronger telecommunications signals in the Echo Park Community, and accepts the applicant's assertion that this is the right place for a new installation. He suggests that with appropriate modifications, this proposal could minimize visual impacts.

September 29, 2015 – E-mail from Amy Ablakat, Planning Deputy in Council District 13, expressed that their office had received public concern regarding this proposal, including:

- Proposed scale, visual impacts, inconsistent walls and screening neighboring properties, especially relating to height restrictions.
- Improper notification/posting on-site of the upcoming public hearing.

- Misrepresentation of the height and shadowing impacts.
- The project was not presented to the Echo Park Neighborhood Council.

The matter was taken under advisement to allow the applicant to review their plans and proposal with the Echo Park Neighborhood Council and the Echo Park Historical Society. The advisement period was to allow for community outreach and for the community to submit additional comments.

During the advisement period, the applicant's representative emailed, and sent a letter and drawings to the Echo Park Historic Society via FedEx, but did not receive any response. The representative submitted no evidence that they reached out to the Neighborhood Council, and the applicant did not obtain any input, review, support or opposition from the Neighborhood Council.

During the advisement period, the Zoning Administrator did research into SurveyLA, and any historical status of the subject property. The subject property was built in 1928 and has been identified as an "Excellent, intact example of an Art Deco style apartment house exhibiting quality of design. One of very few examples of the style in the area." The California State Office of Historic Preservation has developed California Historical Resource (CHR) Status Codes as a standardized system for classifying historical resources in the State's Historic Resources Inventory. These Status Codes are used statewide and are assigned to properties and districts by field surveyors as part of the survey process and when they are designated. These Status Codes are used in ZIMAS and HistoricPlacesLA. The property appears to be eligible for National Register as an individual property through SurveyLA or other survey evaluation (Status Code "3S"); also, the property appears to be eligible for California Register as an individual property through SurveyLA or other survey evaluation (Status Code "3CS"); additionally, the property appears to be individually eligible for local listing or designation through SurveyLA or other survey evaluation (Status Code "5S3"). Further, for the purposes of the California Environmental Quality Act (CEQA), designated or eligible resources are considered "Historical Resources (PRC15064.5(a).

BASIS FOR CONDITIONAL USE PERMITS

A particular type of development is subject to the conditional use process because it has been determined that such use of property should not be permitted by right in a particular zone. All uses requiring a conditional use permit from the Zoning Administrator are located within Section 12.24-W of the Los Angeles Municipal Code. In order for a wireless telecommunications facility to be authorized, certain designated findings have to be made. In these cases, there are additional findings in lieu of the standard findings for most other conditional use categories.

FINDINGS

Following (highlighted) is a delineation of the findings and the application of the relevant facts to same:

1. **The project will not enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.**

The subject property is an approximately 9,049 square-foot, irregularly-shaped, sloping, parcel of land, made up of three contiguously owned lots tied together to form one parcel. The site is currently developed with a 20,998 square-foot, four-story residential building. The roof of the building reaches a height of 47 feet 6 inches, while the building parapet reaches 49 feet 6 inches. Adjoining properties to the north are zoned RD1.5-1VL and are developed with single-family dwellings. Surrounding uses are residential multi-family developments ranging in height and density. Adjoining properties to the south are zoned RD1.5-1VL and are developed with one- and two-story multi-family residential dwellings. Adjoining properties to the east are [Q]C2-1VL and are developed with low-density multi-family dwellings. Adjoining properties to the west are zoned R2-1VL and are developed with single-family dwellings.

The applicant proposes the installation 12 panel antennas, 12 remote radio units (RRU), 1 microwave dish, and 2 equipment cabinets behind new 9-foot tall screening on the rooftop of an existing, four-story building. As cellular telephone use and mobility technology has increased, access to mobile networks have become an integral part of our economy. There are few other wireless facilities in the area, leading to a lack of adequate cellular service in the community. The proposed project, by increasing access to mobile networks, and allowing for faster cellular service, would provide a beneficial service to the community, and to the region.

The request is based on a need to meet a coverage gap that the applicant indicates is shown on the propagation maps submitted with the application. The area is generally bounded by Glendale Boulevard on the west, Sunset Boulevard on the south, Morton Avenue on the east, and Avalon Street on the north. This area also represents the limited search area that the applicant is considering for the new facility. The applicant indicates that in their efforts to fill the coverage gap, they looked at five existing sites for co-location. However, each of the five sites were either outside their search ring, or too close to existing Verizon locations. Additionally, three other sites were considered, but each was either unable to accommodate the installation because the roof couldn't support the equipment or the landlord rejected the applicant's proposal, or the site was outside the search ring.

The applicant has made efforts to address aesthetic concerns by redesigning the equipment screen to match the existing building details and color. The proposal was shown to the Echo Park Improvement Association, and they voted to approve "Option 2", which is the redesigned screen which mimics the buildings art deco features and is painted to match the building. It was shown to the Echo Park Historical Society (EPHS), and they wrote a letter dated September 28, 2015 opposing the project based on the historic eligibility of the existing art deco apartment building. The EPHS state in their letter, "The addition of the cellular installation will conflict with the historic nature of the building and mar it's eligibility

for future historic cultural monument nomination." The design was never presented to the Echo Park Neighborhood Council.

The roof of the building reaches a height of 47 feet 6 inches, while the building parapet reaches 49 feet 6 inches. The applicant is requesting a Conditional Use to permit the installation of a wireless telecommunications facility behind new 9-foot tall screening on the rooftop of an existing 49-foot 6-inch tall building. The new wireless facility as proposed would reach a height of 59 feet 6 inches, in lieu of the maximum of 45 feet otherwise allowed. The applicant has made an effort to redesign the screening to match the building façade treatment. However, the prominent profile of the building results in a rooftop which would have a very visible addition of mass that was non-existent previously. The existing building was addressed in SurveyLA, and was identified as an, "Excellent, intact example of an Art Deco style apartment house exhibiting quality of design. One of very few examples of the style in the area." As this building is "intact" as to its Art Deco style, any additional structure on its roof would create an impact

It can be argued that the request could improve coverage and meet capacity needs and as such would provide a service beneficial to the community and allow for improved emergency communication. However, the desirability for such enhanced service must be measured in terms of the impact the facility has on aesthetics and historical resources given the existing physical context of the surroundings. In this instance, both aesthetic and historic resource impacts associated with additional massing on a prominent, building rooftop have not been mitigated to a level that does not adversely impact the built environment.

2. **The project's location, size, height, operations and other significant features will not be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare and safety.**

The applicant proposes the installation 12 panel antennas, 12 remote radio units (RRU), 1 microwave dish, and 2 equipment cabinets behind new 9-foot tall screening on the rooftop of an existing, four-story building. As noted, aesthetics is a prime consideration associated with the installation of wireless facilities, whether it be on a new building or one that dates back to 1928. The use of screening features and other stealth alternatives is a design approach that is often a viable means to minimize visual impacts. However, these typically represent more successful design features when there is no additional massing created, or when the subject building is not an historic resource. When juxtaposed against the existing development, such impacts become more noteworthy given the visibility of the building, and the identification of the site as having historic resource eligibility status. Concerns regarding the visibility of the installation and compatibility of it with the building's architectural integrity were also noted by area residents, the Echo Park Historical Society, and the Office of the Thirteenth Council District.

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7. **An effort in good faith was made by the applicant to locate on existing sites or other facilities in the community in accordance with the guidelines of the City's cellular ordinance.**

The City's Wireless Telecommunications Facility Ordinance strongly encourages the location of new wireless facilities on existing approved structures or sites. The applicant indicated that no co-location opportunities which were viable existed in the area and also noted that other alternative sites were not feasible. According to Propagation maps provided by the applicant, there are few wireless facilities available in the immediate area. Moreover, City records indicate that there is only one approved wireless facilities within 1,000 feet of the subject site.

ADDITIONAL MANDATORY FINDINGS

8. The National Flood Insurance Program rate maps, which are a part of the Flood Hazard Management Specific Plan adopted by the City Council by Ordinance No. 172,081, have been reviewed and it has been determined that this project is located in Zone X, areas outside of the flood zone.

9. On August 5, 2015, 2015, the Department of City Planning issued a Mitigated Negative Declaration (ENV 2015-839-MND) for the proposed project. On the basis of the whole of the record, including any comments received, the lead agency found that with imposition of the mitigation measures described in the MND (and identified in this determination), there is no substantial evidence that the proposed project will have a significant effect on the environment. I do not adopt said action as the mitigation measures do not sufficiently address visual, aesthetic and historic resource impacts associated with the request. This Mitigated Negative Declaration reflects the lead agency's independent judgment and analysis. The records upon which this decision is based are with the Environmental Review Section of the Planning Department in Room 750, 200 North Spring Street.

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Inquiries regarding this matter shall be directed to Azeen Khanmalek, Planning Staff for the Office of Zoning Administration at (213) 978-1336.

DAVID S. WEINTRAUB
Associate Zoning Administrator

DSW:AK:lmc

cc: Councilmember Mitch O'Farrell
Thirteenth District
Adjoining Property Owners

MASTER LAND USE APPLICATION

MASTER LAND USE PERMIT APPLICATION

LOS ANGELES CITY PLANNING DEPARTMENT

Planning Staff Use Only

ENV No. 2015 - 839 - EAF	**Existing Zone** RD1.5 - 1VL		**District Map** 142-5A209
APC EAST LOS ANGELES	**Community Plan** SILVER LAKE - ECHO PARK - ELYSIAN VALLEY		**Council District** 13
Census Tract 1973.00	**APN** 5420028005	**Case Filed With [DSC Staff]**	**Date** 2.26.15

CASE NO. ZA 2015-838 - CUW

APPLICATION TYPE Conditional Use Permit

(zone change, variance, conditional use, tract/parcel map, specific plan exception, etc.)

1. PROJECT LOCATION AND SIZE

Street Address of Project 1650 ECHO PARK AVE., LOS ANGELES Zip Code 90026

Legal Description: Lot 5 Block _____ Tract PAULI TRACT

Lot Dimensions 44.98 X 103.25 Lot Area (sq. ft.) 3,813.5 Total Project Size (sq. ft.) 140

2. PROJECT DESCRIPTION

Describe what is to be done: Install (12) panel antnenas; (4) per sector; (3) sectors total with associated coax cables & (12) Remote Radio Units; in addition to (1) 2' dia Microwave Dish behind 8' tall FRP screen wall on existing bldg roof

Install (2) equipment cabinets on the roof.

Present Use: Apartment Units Proposed Use: Unmanned WTF

Plan Check No. (if available) _____ Date Filed: _____

Check all that apply:	☐ New Construction	☐ Change of Use	☑ Alterations	☐ Demolition
	☑ Commercial	☐ Industrial	☐ Residential	☐ Tier 1 LA Green Code
Additions to the building:	☐ Rear	☐ Front	☑ Height	☐ Side Yard

No. of residential units: Existing _____ To be demolished _____ Adding _____ Total _____

3. ACTION(S) REQUESTED

Describe the requested entitlement which either authorizes actions **OR** grants a variance:

Code Section from which relief is requested: 12.24W.49 Code Section which authorizes relief: 12.24W.49

Request approval of Conditional Use Permit Pursuant to code Sectiion 12.24W to allow for (12) antenna behind new 8' tall screen wall on exisitng builidng roof with associated equipment on the ground.

Code Section from which relief is requested: 12.24F Code Section which authorizes relief: 12.24W.49

Request permission to exceed the 45' height limit of RD1.5-1VL zone. Tip of proposed antennas is at 59'-6" which is 10' above existing building parapet wall.

Code Section from which relief is requested: _____ Code Section which authorizes relief: _____

List related or pending case numbers relating to this site:

None

4. OWNER/APPLICANT INFORMATION

Applicant's name Reliant Land Services Company Verizon Wireless

Address: 15505 San Canyon Ave., Building D Telephone: (714) 685-0123 Fax: (714) 453-9692

Irvine, CA Zip: 91618 E-mail:

Property owner's name (if different from applicant) 1650 Echo Park LLC

Address: 1650 Echo Park Ave., Telephone: ( ) Fax: ( )

Los Angeles, CA Zip: 90026 E-mail:

Contact person for project information Stella Shih Company Reliant Land Services

Address: 1745 W. Oragnewood Ave., Suite #103 Telephone: (714) 396-0459 Fax: (714) 453-9692

Orange, CA Zip: 92868 E-mail: stella.shih@rlsusa.com

5. APPLICANT'S AFFIDAVIT

Under penalty of perjury the following declarations are made:

a. The undersigned is the owner or lessee if entire site is leased, or authorized agent of the owner with power of attorney or officers of a corporation (submit proof). (NOTE: for zone changes lessee may not sign).

b. The information presented is true and correct to the best of my knowledge.

c. In exchange for the City's processing of this Application, the undersigned Applicant agrees to defend, indemnify and hold harmless the City, its agents, officers or employees, against any legal claim, action, or proceeding against the City or its agents, officers, or employees, to attack, set aside, void or annul any approval given as a result of this Application.

Signature: Stella Print: STELLA SHIH

ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Orange

On February 26, 2015 before me, Raquel Marie Barnas
(Insert Name of Notary Public and Title)

personally appeared Hsun Stella Shih, who proved to me on the basis of satisfactory evidence to be the person~~(s)~~ whose name~~(s)~~ is/are subscribed to the within instrument and acknowledged to me that ~~he~~/she/~~they~~ executed the same in his/her/their authorized capacity~~(ies)~~, and that by ~~his~~/her/~~their~~ signature~~(s)~~ on the instrument the person~~(s)~~, or the entity upon behalf on which the person~~(s)~~ acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Raquel Marie Barnas (Seal)
Signature

RAQUEL MARIE BARNAS
COMM. #2037527
Notary Public - California
Orange County
My Comm. Expires Aug. 18, 2017

6. ADDITIONAL INFORMATION/FINDINGS

In order for the City to render a determination on your application, additional information may be required. Consult the appropriate Special Instructions handout. Provide on attached sheet(s) this additional information using the handout as a guide.

NOTE: All applicants are eligible to request a one time, one-year only freeze on fees charged by various City departments in connection with your project. It is advisable only when this application is deemed complete or upon payment of Building and Safety plan check fees. Please ask staff for details or an application.

Planning Staff Use Only

Base Fee 5350 —	**Reviewed and Accepted by [Project Planner]**	**Date**
Receipt No. 22394	**Deemed Complete by [Project Planner]**	**Date**

Findings/Justification:

CONDITIONAL USE PERMIT (CUP) – LAMC 12.24 U, V & W

City of Los Angeles – Department of City Planning

The Conditional Use Permit Findings/Justification is a required attachment to the *MASTER LAND USE APPLICATION INSTRUCTIONS (CP-7810).*

Public Noticing Requirements: This entitlement requires notification to extend to property owners and occupants within 500 feet of the subject property.

FINDINGS FOR APPROVAL OF A CONDITIONAL USE PERMIT:

In order to grant your request, the following findings/justification must be addressed on this form or on a separate sheet. Explain how your project conforms to the following requirements:

1. That the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.

Wireless telecommunications systems have proven to be invaluable tools in business communications and for personal use. The consumer demand is rapidly growing and data usage has more than doubled since the iphone and ipad were released. The surrounding Verizon antennas are currently being overloaded and are over capacity resulting in drop calls and slower service. Customers are experiencing little to no coverage in the area. These antenna will provide faster service and customers will receive better coverage.

2. That the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The proposed antennas project is on top of the roof of a existing multi-story apartment building in RD1.5-1VL zone. The antennas will be utilized by customer in the exisitng aparmtment building and customers and residents in the surrounding area. This wireless facility is designed to blend into the architecure of the existing buliding. All antennas are behind screening on the roof.

3. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

This proposed wireless facility will support E911 calls. Verizon is federally mandated to comply with the FCC license requirements and will comply with the RF emissions. The antennas are screened with only one sector unscreened. This unscreened scetor is located on the back of the property. This is the least intrusive design. The screening will be designed to match the building and the architectural feature. This project is not located in any Specific Plan Area.

ZA 2015-838 - CUW

City of Los Angeles

Zoning Administrator-Conditional Use Permit Application

For
Verizon Wireless
1650 Echo Park Ave., Los Angeles, CA 90026

Wireless Telecommunication Facility Additional Findings

1. That the project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city or region.
   Wireless telecommunications systems have proven to be invaluable tools in business communications and for personal use. The consumer demand is rapidly growing and data usage has more than doubled since the *iphone* and *ipad* were released. The surrounding Verizon antennas are currently being overloaded and are over capacity resulting in drop calls and slower service. Customers are experiencing little to no coverage in the area. These antennas will provide faster services and customers will receive better coverage.

2. That the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.
   The proposed antennas project is on top of the roof of a multi-story apartment building in restricted density multiple dwelling. The antennas will be utilized by customers in the apartment building and customers and residents in the surrounding area. This wireless facility is designed to blend into the architecture of the existing building. All antennas are behind 8' tall FRP screening on the roof. Verizon is committed to provide a design that is the least instructive and integrate into the surrounding environment harmoniously.

3. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.
   One of the overall goals of the General Plan is to provide an arrangement of land uses, circulations and services which will encourage and contribute to the health, safety welfare and convenience of the people who live and work in the area. Verizon Wireless is building for infrastructure for the 21st Century's information economy which will significantly alter the way Southern Californians communicate, work and commute. Wireless technology is becoming a necessary emergency service device and business tool, as well as being convenient for personal and family use. This proposed wireless facility will support E911 calls. Verizon Wireless is federally mandated to comply with the FCC license requirements and will comply the RF emissions. This project is located within Warner Center Specific Plan Area.

ZA 2015-838 - CUW

4. That the project is consistent with the general requirements of the Wireless Telecommunication Facilities Standards set forth in Section 12.21 A.20 of this code, in a manner that balances the benefit of the project to the public with the facility's technological constraints, design, and location, as well as other relevant factors.

   The proposed project is consistent with the general requirements of the WTF standards of Section 12.21 A20. No adverse impact to the character of the existing neighborhood would occur due to the construction of this wireless facility. The use will not generate any smoke, odor or other adverse impact to the adjacent land uses. Being an unmanned facility, the proposed use requires no parking, has no impact on traffic, circulation or density and will not utilize any leaseable space. Care was taken in locating the antennas and integrating them into the design of the building to minimize potential visual impacts from surrounding public viewing areas.

ZA 2015-938 - CUW

March 02, 2015

To: Maryann Neward
RE: Verizon Wireless Morton, Site Located at: 1650 Echo Park Ave, Los Angeles, CA 90026

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

Contact Name	Contact Email	Contact Phone
Diana Scudder	WestSoCalNetworkCompliance@VerizonWireless.com	949-243-4849

Sincerely,

Victor Fung
Manager-RF System Design
Verizon Wireless

ZA 2015-0838 -CUW

February 26, 2015

Office of Zoning Administration
200 N. Spring St., 7th Floor
Los Angeles, CA 90012

Re: Verizon Wireless application for Conditional Use Permit, 1650 Echo Park Ave., Los Angeles, CA 90026, (our reference: VZW Morton)

Dear Office of Zoning Administration____:

More than thirty days have passed since we filed the application referenced above on Feb 26, 2015 (the "Application"). During that time, we have not received any request for additional information or notice that the Application is incomplete. Therefore, the Application is deemed complete under the California Permit Streamlining Act.

In addition, under the federal Telecommunications Act, local governments must act on wireless facility permit applications within a "reasonable period of time." In 2009, the Federal Communications Commission ("FCC") issued a declaratory ruling, commonly known as the "Shot Clock ruling," which clarified this obligation. Under the Shot Clock ruling, local governments generally must take final action on a wireless facility permit application within 90 days after it was filed for a collocation application, or 150 days after any other application was filed. In this case, we believe the [90/150] day deadline applies, which means that the deadline under federal law for final action on the Application will expire on [Shot Clock deadline per tracker].

Verizon Wireless expects final action on the Application on or before that date, and stands ready to cooperate with any reasonable requests to facilitate a timely decision. Thank you for your attention to this matter.

Sincerely,

Stella Shih
Reliant Land Services
1745 W. Orangewood Ave., #103
Orange, CA 92868
714-396-0459

ZA 2015-0838 - CW

Verizon Wireless
15505 Sand Canyon Ave.
Building D-1
Irvine, CA 92618

February 26, 2015

Subject: Verizon Proposed Telecommunications Facility
"Morton"
Rooftop Facility – 1650 Echo Park Ave., Los Angeles, CA 90026

Verizon Wireless' Network Engineering Department conducts radio frequency (RF) emission studies on all sites in Southern California. All cellular transmit and receive equipment is manufactured to meet strict FCC requirements. Prior to use in a cellular system, the equipment must have FCC approval as to design, use and technical parameters. Upon turn up, Verizon Wireless will utilize 746-757 Mhz, 776-787 Mhz, 880-894 Mhz, 835-848 Mhz, 1965-1970 Mhz, 1885-1890 Mhz and 1715-1730, 2115-2130 Mhz spectrum. 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.

In the event that Verizon Wireless' installation does cause interference, please contact Network Operations Control Center (NOCC) at (800)-264-6620.

Please let us know if you have any additional concerns.

Verizon Wireless
Diana Scudder.
Verizon Wireless.
WestSoCalNetworkCompliance@VerizonWireless.com
949-243-4849.

ZA 2015-0838-CUW

Existing Wireless Facilities: Co-location efforts

The coverage objective is to provide coverage along Van Nuys Blvd.

1. 1717 Glendale Blvd.: The monopole is outside of search ring. Verizon is already present at this location.

2. 1927 Reservoir St.: This rooftop site is outside of search ring.

3. 1910 W. Sunset Blvd: This rooftop façade mount is outside of search ring.

4. 1830 W. Sunset Blvd.: The rooftop site is outside of search ring.

5. 1525 N. Alvarado St., Rooftop site is out of search ring, very close to existing Verizon location at 1717 Glendale Blvd.

Verizon Wireless also researched other properties within the area.

6. 1650 Lucretia Ave.: The existing roof will not be able to support cell site.

7. 1815 Morton Ave.: The landlord rejected Verizon's proposal.

8. 1615 Echo Park Ave.: Outside of search ring and ownership of the property is complicated and unclear.

ZA 2015-0838 - CUW

Morton NCD

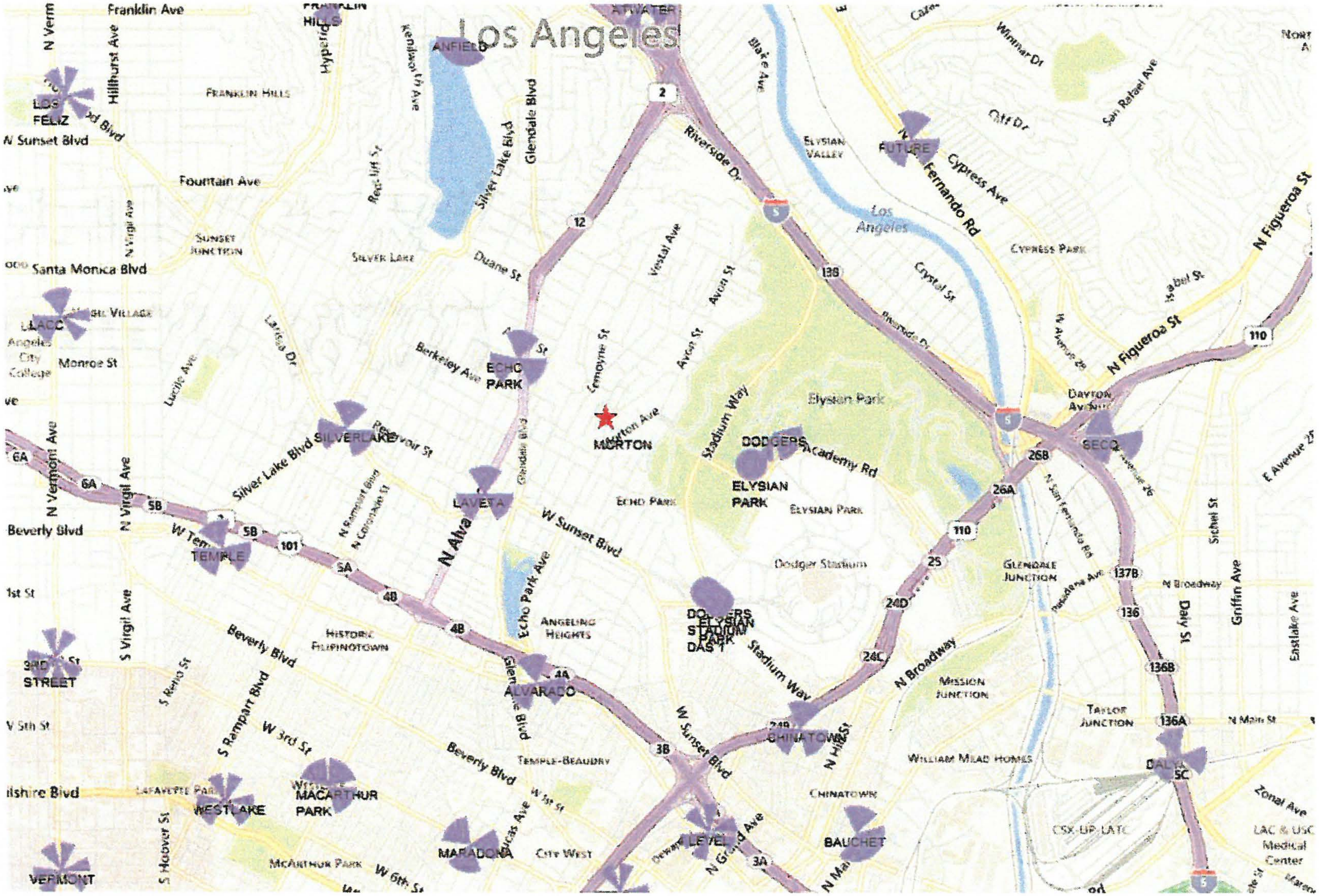
Propagation Maps

MTX 53 – BSC 10

ZA 2015-0838 –

Surrounding On-Air Sites

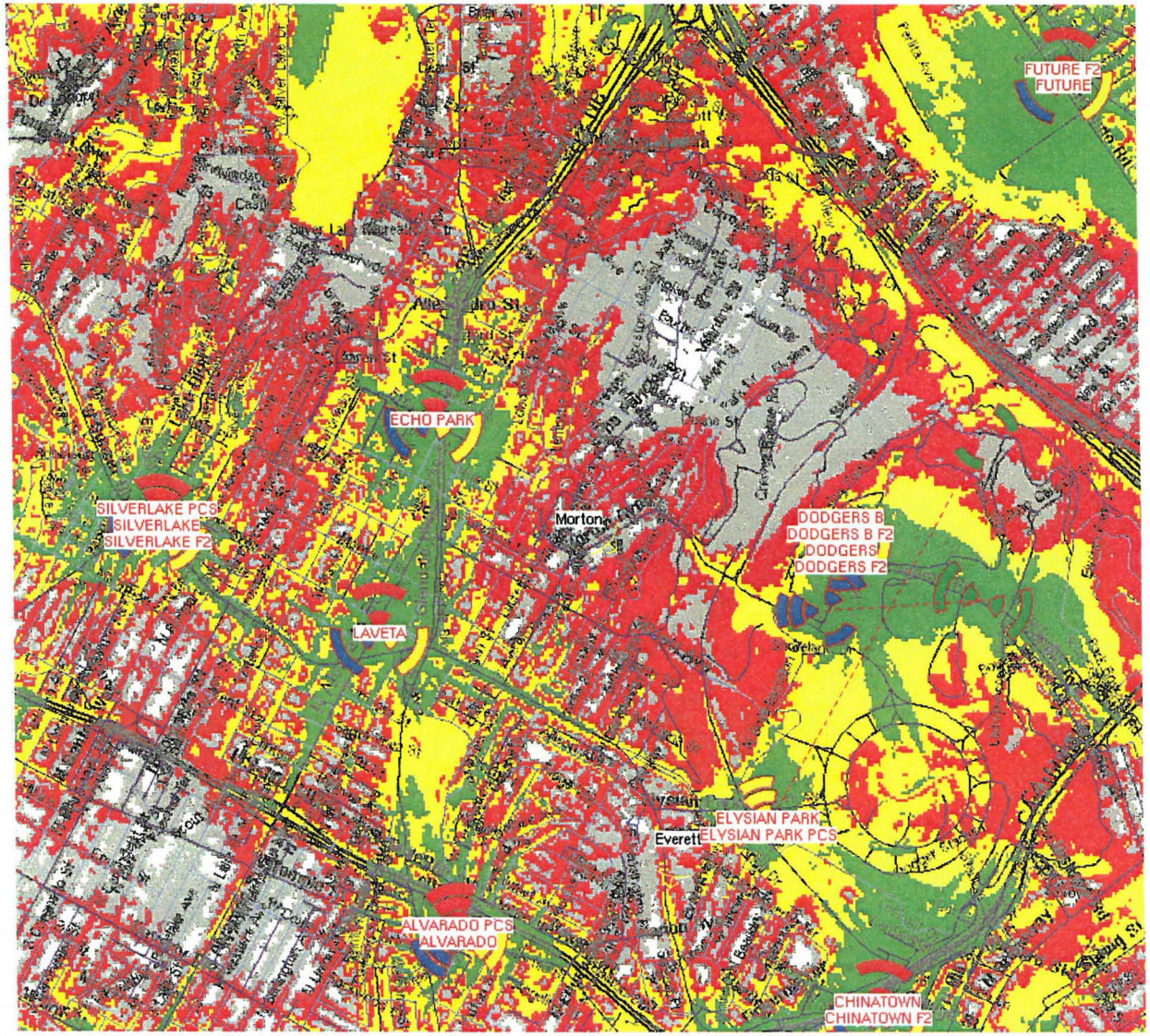
Morton



ZA 2015-0838 - CUW

700 MHz RSRP Plot

On-Air Sites ONLY



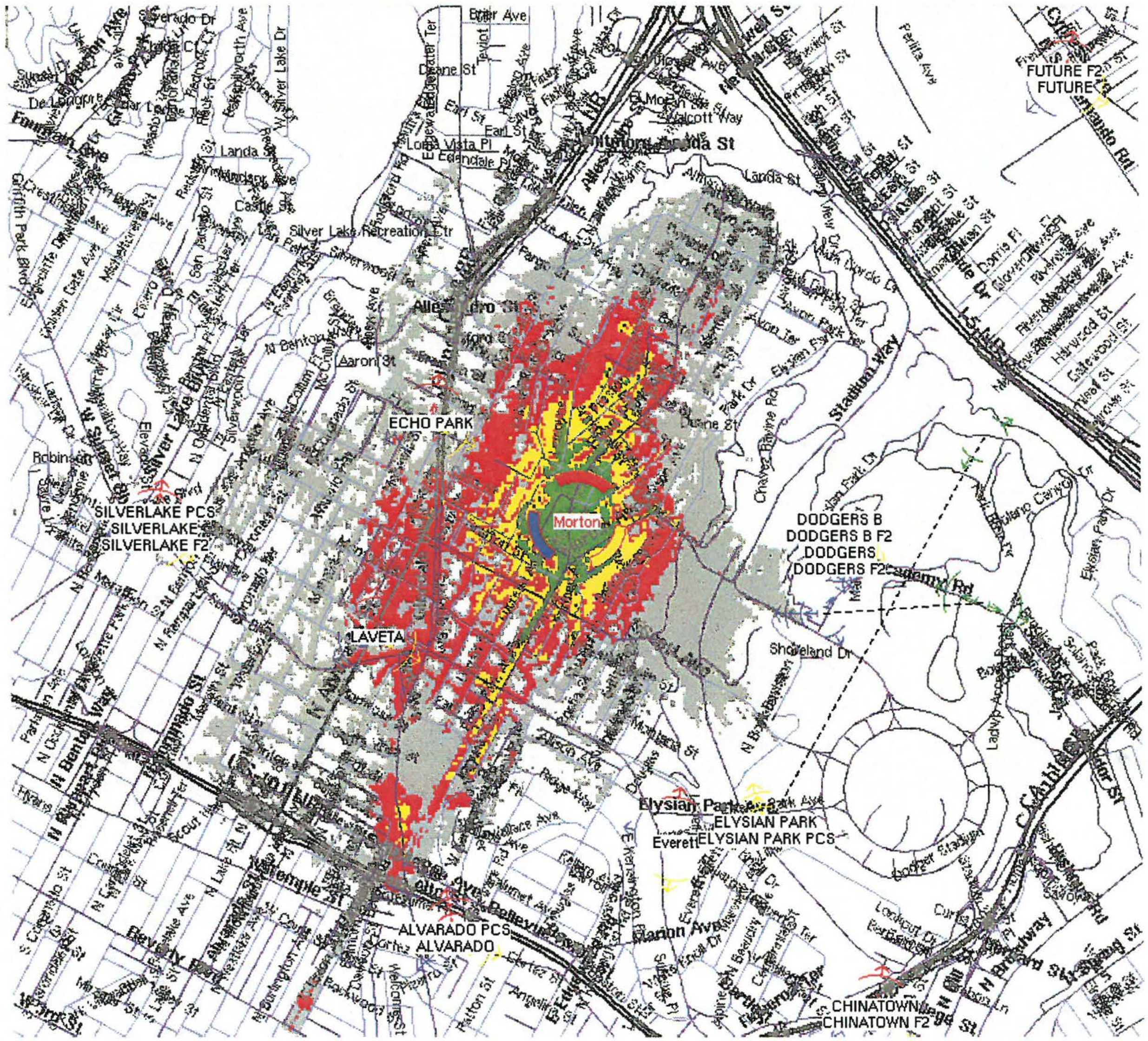
LTE RSRP
7CL
Clr: RSRP (dBm)
>= -75
>= -85
>= -95
>= -105

Coverage Area
Green = Good
Yellow = Fair
Red = Poor

ZA 2015-0838 - CUW

700 MHz RSRP Plot

Morton ONLY

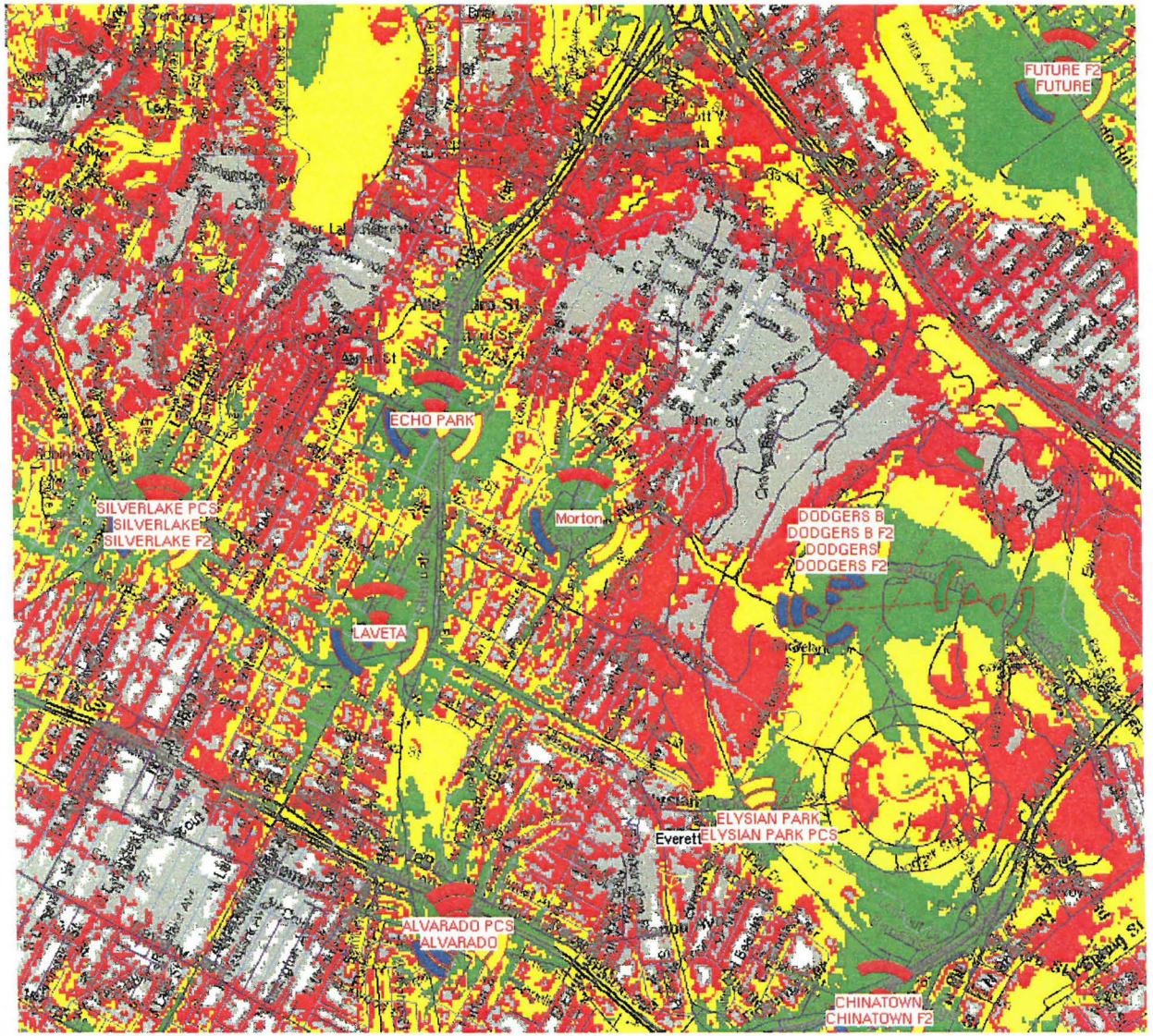


LTE RSRP
7CL
Clr: RSRP (dBm)
- >= -75
- >= -85
- >= -95
- >= -105

Coverage Area
Green = Good
Yellow = Fair
Red = Poor

700 MHz RSRP Plot

Morton + On-Air Sites



ZA 2015-0638 - aw

ENVIRONMENTAL REPORT

ND, MND, CE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	CD 13 - MITCH O'FARRELL
PROJECT TITLE	**CASE NO.**
ENV-2015-839-MND	ZA-2015-838-CUW

PROJECT LOCATION
1650 N ECHO PARK AVE

PROJECT DESCRIPTION
Pursuant to section 12.24-W,49 of the Los Angeles Municipal Code, 1) a conditional use to allow for a new wireless telecommunication facility on top of an existing 49-foot 6-inch residential building behind new 8-foot tall screening, and, 2) consideration for the proposed facility to reach a maximum height of 59-feet 6-inches in lieu of a maximum of 45 feet allowed by section 12.21.1-A.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
Stella Shih
1745 Orangewood Dr. Suite 103
Orange, CA 92868

FINDING:

The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance

(CONTINUED ON PAGE 2)

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-make may adopt the mitigated negative declariation, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	**TITLE**	**TELEPHONE NUMBER**
Azeen Khanmalek	City Planning Assistant	(213) 978-1336

ADDRESS	**SIGNATURE (Official)**	**DATE**
200 N. SPRING STREET, 7th FLOOR LOS ANGELES, CA. 90012		AUGUST 5, 2015

I-70. Aesthetics (Unmanned Wireless Telecommunications Facility)

- Environmental impacts may result to the character and aesthetics of a neighborhood by project implementation. However, the potential impact will be mitigated to a less than significant level by the following measure:
- The proposed facility shall be disguised so as to blend into the surrounding neighborhood to the satisfaction of the decision-maker. This may involve, but not be limited to, one or more of the following: painting and texturing to match the existing surroundings, disguising the installation, concealment behind screen walls, incorporation into existing structures, and/or surrounding the installation with additional landscaping.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
and CHECKLIST

(CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 13 - MITCH O'FARRELL	**DATE:** 07/06/2015
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2015-839-MND	**RELATED CASES:** ZA-2015-838-CUW	
PREVIOUS ACTIONS CASE NO.:	☐ Does have significant changes from previous actions. ✓ Does NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: CONDITIONAL USE FOR A NEW VERIZON ROOFTOP WIRELESS TELECOMMUNICATIONS FACILITY.		
ENV PROJECT DESCRIPTION: Pursuant to section 12.24-W,49 of the Los Angeles Municipal Code, 1) a conditional use to allow for a new wireless telecommunication facility on top of an existing 49-foot 6-inch residential building behind new 8-foot tall screening, and, 2) consideration for the proposed facility to reach a maximum height of 59-feet 6-inches in lieu of a maximum of 45 feet allowed by section 12.21.1-A.		
ENVIRONMENTAL SETTINGS: The proposed project is a conditional use for a new wireless telecommunication facility on top of an existing 4-story residential building. The project also proposes a maximum height of 59-feet 6-inches, in lieu of the maximum of 45 feet allowed by the property's designation as RD1.5-1VL. Properties to the north, south, and east are zones RD1.5-1VL, while properties to the west are zoned [Q]C2-1VL. The adjacent properties to the south, east, and west are developed with multi-family apartment buildings, and the adjacent property to the north is developed with a single family home. While the subject site is not located on a hillside street, many streets in the project vicinity are designated hillside streets.		
PROJECT LOCATION: 1650 N ECHO PARK AVE		

COMMUNITY PLAN AREA: SILVER LAKE - ECHO PARK - ELYSIAN VALLEY **STATUS:** ✓ Does Conform to Plan ☐ Does NOT Conform to Plan	**AREA PLANNING COMMISSION:** EAST LOS ANGELES	**CERTIFIED NEIGHBORHOOD COUNCIL:** GREATER ECHO PARK ELYSIAN
EXISTING ZONING: RD1.5-1VL	**MAX. DENSITY/INTENSITY ALLOWED BY ZONING:** N/A	**LA River Adjacent:**
GENERAL PLAN LAND USE: LOW MEDIUM II RESIDENTIAL	**MAX. DENSITY/INTENSITY ALLOWED BY PLAN DESIGNATION:** N/A	
	PROPOSED PROJECT DENSITY: N/A	

Determination (To Be Completed By Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

✔ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	City Planning Assistant	(213) 978-1336
	Title	Phone

Evaluation Of Environmental Impacts:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
   a. Earlier Analysis Used. Identify and state where they are available for review.
   b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
   a. The significance criteria or threshold, if any, used to evaluate each question; and
   b. The mitigation measure identified, if any, to reduce the impact to less than significance.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☑ AESTHETICS	☐ GREEN HOUSE GAS EMISSIONS	☐ POPULATION AND HOUSING
☐ AGRICULTURE AND FOREST RESOURCES	☐ HAZARDS AND HAZARDOUS MATERIALS	☐ PUBLIC SERVICES
☐ AIR QUALITY	☐ HYDROLOGY AND WATER QUALITY	☐ RECREATION
☐ BIOLOGICAL RESOURCES	☐ LAND USE AND PLANNING	☐ TRANSPORTATION/TRAFFIC
☐ CULTURAL RESOURCES	☐ MINERAL RESOURCES	☐ UTILITIES AND SERVICE SYSTEMS
☐ GEOLOGY AND SOILS	☐ NOISE	☐ MANDATORY FINDINGS OF SIGNIFICANCE

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

Background

PROPONENT NAME:
Stella Shih

PHONE NUMBER:
(714) 396-0459

APPLICANT ADDRESS:
1745 Orangewood Dr. Suite 103
Orange, CA 92868

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:
02/26/2015

PROPOSAL NAME (if Applicable):

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
I. AESTHETICS					
a.	Have a substantial adverse effect on a scenic vista?				✓
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?		✓		
d.	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				✓
II. AGRICULTURE AND FOREST RESOURCES					
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?				✓
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✓
d.	Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓
III. AIR QUALITY					
a.	Conflict with or obstruct implementation of the applicable air quality plan?				✓
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?				✓
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				✓
d.	Expose sensitive receptors to substantial pollutant concentrations?				✓
e.	Create objectionable odors affecting a substantial number of people?				✓
IV. BIOLOGICAL RESOURCES					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				✓
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓
V. CULTURAL RESOURCES					

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
a.	Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				✓
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				✓
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓
d.	Disturb any human remains, including those interred outside of formal cemeteries?				✓
VI. GEOLOGY AND SOILS					
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				✓
b.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Strong seismic ground shaking?				✓
c.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Seismic-related ground failure, including liquefaction?				✓
d.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides?				✓
e.	Result in substantial soil erosion or the loss of topsoil?				✓
f.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				✓
g.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				✓
h.	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓
VII. GREEN HOUSE GAS EMISSIONS					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				✓
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				✓
VIII. HAZARDS AND HAZARDOUS MATERIALS					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				✓
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✓
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				✓
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✓

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				✓
IX. HYDROLOGY AND WATER QUALITY					
a.	Violate any water quality standards or waste discharge requirements?				✓
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				✓
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				✓
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				✓
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				✓
f.	Otherwise substantially degrade water quality?				✓
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓
i.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				✓
j.	Inundation by seiche, tsunami, or mudflow?				✓
X. LAND USE AND PLANNING					
a.	Physically divide an established community?				✓
b.	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				✓
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓
XI. MINERAL RESOURCES					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				✓
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				✓
XII. NOISE					
a.	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				✓
b.	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				✓
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				✓
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				✓

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				✓
XIII. POPULATION AND HOUSING					
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b.	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓
XIV. PUBLIC SERVICES					
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection?				✓
b.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Police protection?				✓
c.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Schools?				✓
d.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Parks?				✓
e.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Other public facilites?				✓
XV. RECREATION					
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✓
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✓
XVI. TRANSPORTATION/TRAFFIC					
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				✓

		Potentially significant impact	Potentially significant unless mitigation incorporated	Less than significant impact	No impact
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				✓
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e.	Result in inadequate emergency access?				✓
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				✓
XVII. UTILITIES AND SERVICE SYSTEMS					
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				✓
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
c.	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓
d.	Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				✓
g.	Comply with federal, state, and local statutes and regulations related to solid waste?				✓
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE					
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				✓
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				✓
c.	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				✓

Note: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

The Environmental Impact Assessment includes the use of official City of Los Angeles and other government source reference materials related to various environmental impact categories (e.g., Hydrology, Air Quality, Biology, Cultural Resources, etc.). The State of California, Department of Conservation, Division of Mines and Geology - Seismic Hazard Maps and reports, are used to identify potential future significant seismic events; including probable magnitudes, liquefaction, and landslide hazards. Based on applicant information provided in the Master Land Use Application and Environmental Assessment Form, impact evaluations were based on stated facts contained therein, including but not limited to, reference materials indicated above, field investigation of the project site, and any other reliable reference materials known at the time.

Project specific impacts were evaluated based on all relevant facts indicated in the Environmental Assessment Form and expressed through the applicant's project description and supportive materials. Both the Initial Study Checklist and Checklist Explanations, in conjunction with the City of Los Angeles's Adopted Thresholds Guide and CEQA Guidelines, were used to reach reasonable conclusions on environmental impacts as mandated under the California Environmental Quality Act (CEQA).

The project as identified in the project description may cause potentially significant impacts on the environment without mitigation. Therefore, this environmental analysis concludes that a Mitigated Negative Declaration shall be issued to avoid and mitigate all potential adverse impacts on the environment by the imposition of mitigation measures and/or conditions contained and expressed in this document; the environmental case file known as **ENV-2015-839-MND** and the associated case(s), **ZA-2015-838-CUW** . Finally, based on the fact that these impacts can be feasibly mitigated to less than significant, and based on the findings and thresholds for Mandatory Findings of Significance as described in the California Environmental Quality Act, section 15065, the overall project impact(s) on the environment (after mitigation) **will not:**

- Substantially degrade environmental quality.
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

ADDITIONAL INFORMATION:

All supporting documents and references are contained in the Environmental Case File referenced above and may be viewed in the EIR Unit, Room 763, City Hall.

For City information, addresses and phone numbers: visit the City's website at http://www.lacity.org ; City Planning - and Zoning Information Mapping Automated System (ZIMAS) cityplanning.lacity.org/ or EIR Unit, City Hall, 200 N Spring Street, Room 763. Seismic Hazard Maps - http://gmw.consrv.ca.gov/shmp/
Engineering/Infrastructure/Topographic Maps/Parcel Information - http://boemaps.eng.ci.la.ca.us/index01.htm or
City's main website under the heading "Navigate LA".

	TITLE:	TELEPHONE NO.:	DATE:
PREPARED BY:	City Planning Assistant	(213) 978-1336	07/09/2015

Impact?	Explanation	Mitigation Measures

APPENDIX A: ENVIRONMENTAL IMPACTS EXPLANATION TABLE

I. AESTHETICS			
a.	NO IMPACT	The property is not located within or adjacent to an area containing protected scenic vista resources	
b.	NO IMPACT	The property is not within or adjacent to a state-designated scenic highway	
c.	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	**The project proposes a wireless telecommunications facility on a rooftop, which will require aesthetic mitigation.**	I-70
d.	NO IMPACT	There will be no light or glare changes to the exterior of the site, no impacts anticipated.	
II. AGRICULTURE AND FOREST RESOURCES			
a.	NO IMPACT	The project results in no conversion of protected farmland resources	
b.	NO IMPACT	The project results is no conflict with any Williamson Act contract encumbrances	
c.	NO IMPACT	The project results in no forest or timberland resources	
d.	NO IMPACT	The project results in no forest or timberland resources	
e.	NO IMPACT	The project results in no conversion of agricultural or forest to non-agricultural or non-forest uses	
III. AIR QUALITY			
a.	NO IMPACT	No violation of air quality standards are predicted	
b.	NO IMPACT	No violation of air quality standards are predicted	
c.	NO IMPACT	No violation of air quality standards are predicted	
d.	NO IMPACT	No violation of air quality standards are predicted	
e.	NO IMPACT	The project will no create substantial objectionable odors	
IV. BIOLOGICAL RESOURCES			
a.	NO IMPACT	The project results in no impact on protected species, habitats, or biological communities.	
b.	NO IMPACT	The project results in no impact on any riparian or other sensitive natural communities	

	Impact?	Explanation	Mitigation Measures
c.	NO IMPACT	The project proposes to utilize an existing building located within a highly urbanized area; the project results in no impact on protected wetland areas.	
d.	NO IMPACT	The project results in no impact on the migration of wildlife or access or availability of nursery sites.	
e.	NO IMPACT	The project results in no impact on protected biological resources or protected tree species.	
f.	NO IMPACT	The project results in no impact on any habitat or natural community conservation plan	
V. CULTURAL RESOURCES			
a.	NO IMPACT	Site is not a historic cultural monument	
b.	NO IMPACT	No cultural/historic impacts are predicted.	
c.	NO IMPACT	No cultural/historic impacts are predicted.	
d.	NO IMPACT	No cultural/historic impacts are predicted.	
VI. GEOLOGY AND SOILS			
a.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
b.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
c.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
d.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
e.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
f.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
g.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
h.	NO IMPACT	No construction that will require grading or excavation is proposed, no impact will result.	
VII. GREEN HOUSE GAS EMISSIONS			
a.	NO IMPACT	No new greenhouse gas emissions are predicted	
b.	NO IMPACT	The project proposes to utilize an existing residential building, located within a highly urbanized area, no impacts will occur	

	Impact?	Explanation	Mitigation Measures
VIII. HAZARDS AND HAZARDOUS MATERIALS			
a.	NO IMPACT	The project proposes no use or activity resulting in the routine use, creations, transportation, or disposal of hazardous materials.	
b.	NO IMPACT	The project proposes no use or activity resulting in the routine use, creations, transportation, or disposal of hazardous materials.	
c.	NO IMPACT	The project proposes no use or activity resulting in the routine use, creations, transportation, or disposal of hazardous materials.	
d.	NO IMPACT	The property is not listed within any database of hazardous materials sited	
e.	NO IMPACT	The property is not located within nor within two miles of an airport land use plan	
f.	NO IMPACT	The property is not located within the vicinity of a private airstrip	
g.	NO IMPACT	The project is located within an existing developed commercial area. The project results in no impact on emergency response or evacuation plans.	
h.	NO IMPACT	The property is located within a highly urbanized area, with no exposure to wildland areas	
IX. HYDROLOGY AND WATER QUALITY			
a.	NO IMPACT	The project will not violate any plans or standards	
b.	NO IMPACT	The project results in no impacts on groundwater supplies or recharge	
c.	NO IMPACT	The project results in no impact on existing drainage patterns that would result in substantial erosion or on- or off-site siltation	
d.	NO IMPACT	The project results in no impact on existing drainage patterns that would result in increased storm water run off or on- or off-site flooding	
e.	NO IMPACT	The project results in no impact on existing drainage patterns that would result in increased storm water run off or negative impacts on existing storm water drainage systems.	
f.	NO IMPACT	The project does not adversely affect water quality	
g.	NO IMPACT	The project proposes no new construction in a flood zone	
h.	NO IMPACT	The project proposes no new construction in a flood zone	

	Impact?	Explanation	Mitigation Measures
i.	NO IMPACT	The project is not located in an area identified as at risk due to failure of a levee or dam	
j.	NO IMPACT	The property is not located in an area identified as at-risk for inundation due to seiche, tsunami, or mudflow	
X. LAND USE AND PLANNING			
a.	NO IMPACT	The project proposes no new construction or use that would result in the physical division on an established community.	
b.	NO IMPACT	The project proposes no use or activity in conflict with any applicable plan	
c.	NO IMPACT	The project results in no impact on any habitat or natural community conservation plan	
XI. MINERAL RESOURCES			
a.	NO IMPACT	The project results in no impact on availability or access to any mineral resources.	
b.	NO IMPACT	The project results in no impact on availability or access to any mineral resources.	
XII. NOISE			
a.	NO IMPACT	The project will not result in noise levels that exceed standards of any plan or element	
b.	NO IMPACT	The project is not anticipated to result in significant levels of ground borne noise or vibration impacts	
c.	NO IMPACT	The project will not result in a permanent increase in ambient noise levels in the project vicinity	
d.	NO IMPACT	No temporary or periodic increase in ambient noise levels in predicted.	
e.	NO IMPACT	The property is not located within nor within two miles of an airport land use plan	
f.	NO IMPACT	The property is not located within the vicinity of a private airstrip	
XIII. POPULATION AND HOUSING			
a.	NO IMPACT	The project proposes an unmanned wireless telecommunication device on top of an existing residential building; the project will not result in growth-inducing impacts.	
b.	NO IMPACT	The project results in no displacement of existing housing units.	
c.	NO IMPACT	The project results in no displacement of any population or people.	
XIV. PUBLIC SERVICES			

	Impact?	Explanation	Mitigation Measures
a.	NO IMPACT	The site is adequately serviced by local emergency medical and fire services.	
b.	NO IMPACT	The site is adequately serviced by local police services.	
c.	NO IMPACT	The project results in no impact on existing school services.	
d.	NO IMPACT	The project results in no impact on existing park services	
e.	NO IMPACT	The project results in no impact on other public service levels	
XV. RECREATION			
a.	NO IMPACT	The project results in no impact on existing parks or recreational facilities	
b.	NO IMPACT	The project proposes no new parks or recreational facilities, nor is it required to do so.	
XVI. TRANSPORTATION/TRAFFIC			
a.	NO IMPACT	The project does not conflict with any relevant plan or program	
b.	NO IMPACT	The project does not conflict with any relevant plan or program	
c.	NO IMPACT	No impact is predicted.	
d.	NO IMPACT	No impact is predicted.	
e.	NO IMPACT	No impact is predicted.	
f.	NO IMPACT	The project does not conflict with any relevant plan or program	
XVII. UTILITIES AND SERVICE SYSTEMS			
a.	NO IMPACT	The project proposes no use or activity that would exceed wastewater treatment requirements	
b.	NO IMPACT	The project proposes no new use or activity that would result in the requirement for new water or wastewater treatment facilities.	
c.	NO IMPACT	The project results in no new generation of additional storm water runoff that would require construction of new storm water treatment infrastructure.	
d.	NO IMPACT	The project does not propose new or increased water usage.	
e.	NO IMPACT	The project proposes no use or activity that would exceed water supplies.	
f.	NO IMPACT	The project's solid waste disposal needs are not anticipated to exceed permitted landfill capacity.	
g.	NO IMPACT	The project will not result in any significant impact on compliance with federal, state, and local statutes and regulations related to solid waste.	

	Impact?	Explanation	Mitigation Measures
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE			
a.	NO IMPACT	The project has no impact on fish, wildlife, or other natural resources, no any impact on significant archeological resources.	
b.	NO IMPACT	All identified impacts were determined to be less than significant or reduced to a less that significant level with implementation of mitigation measures. As such, the project results in no cumulative impacts.	
c.	NO IMPACT	The project proposes no use that is otherwise prohibited, and the analysis identified no impact that would result in any substantial adverse impacts on human beings.	

MISCELLANEOUS REPORTS

Address: 1650 N ECHO PARK AVE
Name: Los Palos Apartments
Year built: 1928
Architectural style: Art Deco

Context 1:

Context:	Architecture and Engineering, 1850-1980
Sub context:	L.A. Modernism, 1919-1980
Theme:	Related Responses to Modernism, 1926-1970
Sub theme:	Art Deco, 1926-1939
Property type:	Residential
Property sub type:	No Sub-Type
Criteria:	C/3/3
Status code:	3S;3CS;5S3
Reason:	Excellent, intact example of an Art Deco style apartment house exhibiting quality of design. One of the very few examples of the style in the area.

Address: 2045 N ECHO PARK AVE
Name:
Year built: 1907
Architectural style: Victorian, Vernacular Cottage, hip roof

Context 1:

Context:	Residential Development and Suburbanization, 1850-1980
Sub context:	No Sub-context
Theme:	Early Residential Development, 1880-1930
Sub theme:	Early Single-Family Residential Development, 1880-1930
Property type:	Residential
Property sub type:	Single-Family Residence
Criteria:	A/1/1
Status code:	3S;3CS;5S3
Reason:	Rare, intact example of early residential development in the area; most examples from this period do not retain integrity.

ECHO PARK HISTORICAL SOCIETY

September 28, 2015

Azeen Khanmalek, Project Planner
City of Los Angeles, Department of City Planning
Office of the Zoning Administrator
200 N. Spring St., Room 763
Los Angeles, CA., 90012

Case#: ZA 2015-838-CUW, 1650 Echo Park Ave Cell Antennae

Mr. Khanmalek,

The Echo Park Historical Society (EPHS) objects to the approval of the above mentioned Cellular installation for the following reasons:

- The existing building is already over the approved height for the planning area, and the additional height of the enclosure will increase that further above the approved 45' Height District for the Plan area, to 59' 6", nearly 15 feet over what is allowed.
- The addition of the cellular installation will conflict with the historic nature of the building and mar it's eligibility for future historic cultural monument nomination.
- The installation is in conflict with the city's policy of collocating antennas.

We respectfully request you deny this application and maintain the spirit of the Silver Lake/Echo Park/Elysian Valley Community Plan by maintaining the maximum height of 45 feet, for this important hillside area.

Jim Schneeweis
President, EPHS

SCHWARTZ HYDE & SULLIVAN, LLP

WWW.SANLAWYERS.COM

TIMOTHY K. GARFIELD
LAUREL LEE HYDE
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(1941-2011)

WRITER'S EMAIL:
KSULLIVAN@SANLAWYERS.COM

EIN: 33-0718779

May 26, 2016

Via FedEx and Email (Felicidad.pingol@lacity.org**)**

Christopher Arellano, President
and Area Planning Commission Members
c/o Fely C. Pingol, Commission Executive Assistant
East Los Angeles Area Planning Commission
200 North Spring Street, Room 532
Los Angeles, CA 90012
(213) 978-1300

Re: Verizon Wireless's Appeal of Zoning Administrator Decision on ZA 2015-0838 (CUW) for the Unmanned And Stealthed Telecommunications Facility at 1650 North Echo Park Avenue, Los Angeles (Morton).

President Arellano:

Our office represents Verizon Wireless ("Verizon") regarding the wireless telecommunications facility proposed at 1650 North Echo Park Avenue in the City of Los Angeles (the "Property") pursuant to the denial of City ZA 2015-0838 (CUW) (the "Facility").

Verizon's Facility is needed to fill an acknowledged significant gap in coverage for area residents, businesses and vehicle users in the most densely populated Council District in the City. Verizon's unmanned Facility will screen all antennas and equipment, and will not have any ground-level footprint. Nor will it generate any new traffic trips to the Property, except for maintenance trips every 1-2 months on average.

The Property is not a significant historic resource as determined after a detailed review and study performed by a qualified architectural consultant. (See the discussion at Part F of this letter below, as well as the detailed May 2016 Helix Environmental Planning Historical Resources Technical Report for the Property submitted with this letter). A belief by the Zoning Administrator that the building may be eligible for designation was based only on a survey document, which was not a detailed study. But the Property clearly does not qualify as a significant historical resource under City standards, or under Federal and State criteria either.

Based on the Report and determination that the Property does not qualify for designation as a historical resource (which is new information), Verizon requests that the East Los Angeles Area Planning Commission (APC) grant the appeal and overturn the Zoning Administrator's (ZA) denial of the Facility and the related environmental review document. We also ask that

you circulate this letter to all members and appropriate representatives of the East Los Angeles APC.

A. Verizon's Proposed Facility Is Well-Designed And Avoids Any Significant View Impacts.

Information about Verizon's proposed small unmanned rooftop Facility is:

- The front façade of the building will not be altered. The Facility will be on the roof, with screening to match and blend with the building's existing architectural style and color.

- All antennas and equipment for the Facility will be fully screened from public views.

- Verizon coordinated with Staff on the roof screening design and location, and modified the screening both to angle it away from the front elevation, and to consolidate it around the existing tall rooftop penthouse structures on the building. (**Exhibit 1**, p.1, and **Exhibit 2**).

- The Facility has no ground level footprint; all screened antennas and equipment are on the roof.

- Two large existing structures are already on the roof -- the elevator penthouse structure at 56'-6" high, and the stairwell penthouse at 52'-9" high. (*See* **Exhibit 1**). The current roof parapet wall is at 49'-6", and the building is at 47'-9" (all of which are above the zone's height limit).

- The rooftop Facility at 58'-6" high[1] is only 2 feet above the existing elevator penthouse structure, or only 3.5% (.035%) above the tallest part of the existing building. (*See* **Exhibit 1**, p. 2).

- The MND prepared by the City Planning Department stated that potential aesthetic/view impacts will be sufficiently mitigated by the painted and textured screening that blends with the building and the surrounding neighborhood. The screening is set at an angle and set back from the edge of the building. The painted and textured screening extends the vertical element of the main façade and maintains the symmetrical design of the building.

[1] An early project drawing mistakenly labelled the top of the screening at 59'-6" high. The project planner, Azeen Khanmalek was informed by Verizon of the mistake via e-mail on August 4, 2015. The Zoning Administrator's February 4, 2016 decision notes (at p. 8 of the decision) that the top of the screening is 58'-6'.

- A Line of Sight study shows that, at ground level, a person will have to be at least 100' away from the building on both directions along Echo Park Ave in order to see the top of the proposed screen wall. (**Exhibit 3**).

- The unmanned Facility will generate one maintenance trip to the site only every one to two months on average. This is effectively a zero ADT generation rate for the Facility.

B. Verizon Communicated Extensively With The Community About The Facility.

In addition to working extensively with City Planning staff, Verizon communicated with the District Council Office, the Echo Park Neighborhood Council, the Echo Park Improvement Association, and the Echo Park Historical Society about the Facility as follows:

- At the time of its application to the City in February 2015, Verizon provided the Council Office with a set of plans and photosims. Gary Benjamin of the Council Office responded by email in April 2015. He said the Office would not support the original proposal based on (1) the screening being too close to the front of the building, and (2) the (mistaken) belief that the Property was historically significant.

- In response to the Office's comments, Verizon (in coordination with Planning staff) revised its screening design to angle it away from the front elevation. The revised design and photosims, with two Options, were sent to the new contact person (Amy Ablakat) at the Council Office on July 15, 2015, with an email follow-up on August 10, 2015. But Verizon did not receive any response from Ms. Ablakat on the Office's position about the new design or about any project concerns.

- Verizon met with the Echo Park Improvement Association (EPIA) in July 2015. Two design options were discussed: Option 1 proposed the top of screen wall at 8' above parapet; Option 2 proposed the screen wall at 9-ft. above screen wall. The EPIA preferred Option 2. Although Option 2 had screening that was one (1) foot higher, the screening was angled and set back from the roof's front edge. Option 2 also maintained the symmetry of the facade. The EPIA approved Option 2, as the height difference from the other design was deemed insignificant and the screen treatment matched well with the existing building.

- At the time of its application to the City in February 2015, Verizon sent the application, a set of plans and photosims, and a letter to the Echo Park Neighborhood Council (EPNC). The EPNC was also on the mailing list to receive the Public Hearing notice. But the EPNC did not contact Verizon with any concerns or comments about the project.

- Verizon also contacted the Echo Park Historical Society (EPHS). Emails were sent to the EPHS on October 2nd and October 5th, 2015. Verizon also sent a FedEx package with a set of project plans, photo simulations and a letter to the EPHS. But the EPHS did not contact Verizon with any concerns or comments about the project.

    - Verizon's historical resources consultant also contacted the EPHS three times – by phone, email and a letter – but never received any response or input about the ongoing detailed historical resources study of the Property. (May 2016 Helix Report, p. 7).

C. Verizon's Facility Is Consistent With National, State And City Policies To Promote The Development Of Wireless Communications Networks Within The City.

Approval of Verizon's proposed stealthed Facility is consistent with many laws and policies that promote the rapid and broad development of wireless communications networks, including:

- As of 2011, the Federal Communications Commission ("FCC") found that **about 70% of all E911 calls originated from wireless devices**, and that percentage will continue to increase.[2] One of the main reasons that many people own a wireless phone is the ability to call 911 for help in an emergency.

- A U.S. Department of Health and Human Services report found, as of 2013, that 41% of U.S. homes had only wireless telephones, up from 30% in 2010.[3] Further, Latino adults and low income adults are more likely than other adult groups to be living in homes with only wireless telephones.[4]

  According to demographic data, the Echo Park area to be served by the site has a large number of Latino (64.0%) and low income residents.[5] These City residents are disproportionately and adversely affected by inadequate telecommunications service caused by delays in needed network expansion.

- The FCC determined that the volume of consumer data transmissions utilizing carriers' national mobile networks **will increase by almost 800% between 2013 and 2018,**[6] and

[2] FCC Consumer and Governmental Affairs Bureau, Wireless 911 Services Fact Sheet (originally issued Feb. 1, 2011) (updated version found at https://transition.fcc.gov/cgb/consumerfacts/wireless911srvc.pdf).
[3] FCC Report and Order No. 14-153 (October 21, 2014) page 4, notes 3-4, and http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201407.pdf.
[4] http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201407.pdf, pages 2-3 and Table 2.
[5] http://maps.latimes.com/neighborhoods/neighborhood/echo-park/
[6] FCC Report and Order No. 14-153 (October 21, 2014) page 4, note 6.

that wireless communications networks are important to the U.S.'s economic growth, global competitiveness, and civic life.[7]

- The State Legislature recently declared that the timely deployment of wireless telecommunications facility networks has a significant beneficial economic impact in California. (Government Code section 65964.1(c)).

- The City's General Plan Framework states Objectives to facilitate the development of integrated telecommunications systems for emergency and public safety purposes, economic growth and development, and availability of telecommunications services for all City residents and businesses. (Chapter 9O, Objectives 9.35, 9.36 and 9.37).

D. Verizon's Facility Complies With All Health Safety Regulations And Is Safe.

Verizon's Facility is required to comply, and will comply, with all laws and regulations on health safety. This includes all FCC laws on radio frequency waves.

In addition, the FCC and other organizations have determined, based on a consensus review of many scientific studies, that telecommunications service base stations (antenna sites) are safe. Information about the health safety of such facilities includes:

- American Cancer Society - *http://www.cancer.org/cancer/cancercauses/othercarcinogens/athome/cellular-phone-towers* ("Public exposure to radio waves from cell phone tower antennas is slight for several reasons. The power levels are relatively low, the antennas are mounted high above ground level, and the signals are transmitted intermittently, rather than constantly. At ground level near typical cellular base stations, the amount of RF energy is thousands of times less than the limits for safe exposure set by the US Federal Communication Commission (FCC) and other regulatory authorities. It is very unlikely that a person could be exposed to RF levels in excess of these limits just by being near a cell phone tower.")

- FCC Radio Frequency Safety - *http://www.fcc.gov/general/radio-frequency-safety-0* and *https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety#Q15* ("The RF emissions from cellular or PCS base station antennas are generally directed toward the horizon in a relatively narrow pattern in the vertical plane. In the case of sector (panel) antennas, the pattern is fan-shaped, like a wedge cut from a pie. As with all forms of electromagnetic energy, the power density from the antenna decreases rapidly as one moves away from the antenna.

[7] FCC Report and Order No. 14-153 (October 21, 2014) page 4, note 8.

Consequently, ground-level exposures are much less than exposures if one were at the same height and directly in front of the antenna.")

- World Health Organization - *http://www.who.int/peh-emf/about/WhatisEMF/en/index1.html* (Telecommunications base stations add little to the total ambient radio frequency signals as signal strengths are typically similar to or lower than signal strengths from distant radio and TV stations.)

E. Verizon's Facility Fills A Significant Gap In Coverage And Was Sited In The Least Intrusive Means.

The Facility fills a substantial gap in coverage in the densely populated residential communities along North Echo Park Avenue and Sunset Boulevard. (*See* coverage maps attached as **Exhibit 4**, and aerial photo of the community attached as **Exhibit 5**). As explained and demonstrated in the letter from Verizon's RF engineer dated April 19, 2016, which was recently submitted to the City and this APC, the site is needed to relieve network stresses due to other nearby existing sites that are operating at near capacity or over capacity. Those stresses cause lack of voice coverage and connectivity, dropped calls and lack of call reliability, and slow data processing speeds.

The road segment of Echo Park Avenue at Scott Avenue will also receive substantially improved voice and data services by the Facility. (*See* **Exhibit 4**). That road segment supports a total of about 10,641 average daily traffic trips (ADTs) in the area according to the City's LADOT website. (*See* City Traffic Volume Book (Large Excel File through December 2010) at http://ladot.lacity.org/node/576.)

Further, the mostly residential communities within the search ring and coverage area typically constitute 1-2 story buildings, which are not high enough to support an alternative rooftop facility to achieve Verizon's coverage objectives. (See **Exhibit 6**, City Zoning Map and Verizon's planning consultant's narrative discussion of the lack of alternative sites in the area; see **Exhibit 7,** an alternative site analysis prepared by Verizon's planning consultant.) The proposed Property uniquely provides the height necessary to reach area coverage gaps due to terrain and buildings in the surrounding community. (RF engineer letter, p. 4.)

F. A Detailed Study Determined The Property Is Not A Significant Historical Resource.

The ZA's February 4, 2016 denial decision relied heavily on a belief that the Property may be eligible for designation as a Federal, State and local significant historical resource. That belief was mistaken. Substantial new information, in the form of a May 2016 Helix Environmental Planning Historical Resources Technical Report for the Property, conclusively

found that the site is not a significant historical resource under the Federal, State or local designation criteria.

Reasons that the Property is not a significant historical resource include the following:

- The building's overall design does not enable it to be eligible for designation as significant because the Art Deco elements are present only on the front elevation, which comprises approximately one-quarter of the building's elevations. The other three facades or sides are plain brick elevations with no Art Deco stylistic characteristics. These facades have no decorative elements and are devoid of any architectural significance. Three quarters of the building's overall design contains no Art Deco elements and, therefore, the building cannot be considered to display the main character defining features of the Art Deco style. (May 2016 Helix Report, pp. 25-26 and 28-30).

- Also, the building's main entrance, a dominant feature of the north elevation, is more reminiscent of Spanish Eclectic or Revival architecture than a true delineation of the Art Deco signature geometric concepts. The building's design lacks overall cohesion and integration of the Art Deco design concepts even on the front elevation. (May 2016 Helix Report, pp. 25-26 and 28-30).

- The building lacks extensive, integrated, distinguishing and distinctive Art Deco elements related to colors, lighting, and varietal uses of patterned or designed metals. (May 2016 Helix Report, pp. 25-26 and 28-30).

- As part of the Section 106 process for telecommunications projects, the Property was evaluated in October 2015 for historic and architectural significance and its potential eligibility for nomination to the National Register of Historic Places. **The California State Office of Historic Preservation (SHPO) concurred with the October 2015 determination that the subject property was not considered historically and architecturally significant under any of the established National Register criteria**. (May 2016 Helix Report, pp. 1, 29, and Appendix H). The Property was re-evaluated for the National Register of Historic Places as part of the May 2016 evaluation process, and again found not to be eligible for designation. (May 2016 Helix Report, pp. 29-30).

- For reasons stated above, the Property does not qualify for or merit designation under the California Register Criteria. (May 2016 Helix Report, pp. 28-29 and 30).

- Under the City of Los Angeles Cultural Heritage Ordinance, and the City of Los Angeles Office of Historic Resources materials "What Makes A Resource Historically Significant" (Guidelines), resource designation is reserved only for those structures that are *special, outstanding, inherently valuable,* and that have *distinguishing characteristics* of an architectural style. (*See* **Exhibit 8**). For reasons stated above, the Property does

not qualify for or merit designation under the City Criteria. (May 2016 Helix Report, pp. 19, and 25-30).

- The *SurveyLA* document, relied upon heavily in the ZA's denial decision, was a general survey document[8] that did not make any determination about the Property's significance. *Survey LA* is an example of standard survey documents which record a wide range of buildings, structures and objects within the survey boundary. The survey identifies only the potentially historic elements in the area and makes a preliminary determination of their potential historic significance. These survey documents provide a database for further evaluation by the local planning department staff when a project is brought in for review. (May 2016 Helix Report, p.2).

Because the new May 2016 Helix Report conclusively determined that the Property is not a significant historic resource, the primary reason relied on by the ZA to deny the Facility is no longer available to be used on appeal.

G. No Significant View Or Aesthetic Impacts Result From The Facility.

No significant impacts to views from surrounding properties will result from the Facility for the following reasons:

- The MND prepared by the City Planning staff stated that potential aesthetic/view impacts will be sufficiently mitigated by the painted and textured screening that blends with the building and the surrounding neighborhood. The screening is set at an angle and set back from the edge of the building. The painted and textured screening extends the vertical element of the main façade and maintains the symmetrical design of the building.

- Two large existing structures are already on the roof -- the elevator penthouse structure at 56'-6" high, and the stairwell penthouse at 52'-9" high, which are comparable in height to the Facility. (*See* **Exhibit 1.**)

- A Line of Sight study shows that, at ground level, a person will have to be at least 100' away from the building on both directions along Echo Park Ave in order to see the top of the proposed screen wall. (**Exhibit 3**).

- Photos at and around 1650 North Echo Park Avenue collectively show the lack of view impacts from the proposed Verizon facility, the significant view corridors in the area that will not be significantly impacted by the project, the visual clutter in the area, the limited

[8] *SurveyLA* (using limited staff) looked at 18,150 parcels in the Echo Park-Silver Lake-Elysian Valley area in less than a 10-month period -- or more than 1,815 parcels per month. (*SurveyLA*, pp. 1 and 3). *SurveyLA* noted only "the reason for a property's **potential** historic significance." (Page 16).

ground level and other views of the rooftop of the building due to existing buildings and trees in the area, and the hilly terrain in the area that contributes to the substantial gap in coverage and capacity for Verizon's network. (See **Exhibit 9.**)

- Facility opponents did not present any evidence to support claims of alleged view impacts.

* * * * *

Verizon looks forward to addressing the acknowledged significant gap in coverage and capacity in the Echo Park area by installing the proposed unmanned stealthed Facility. An application for the Facility was filed in February 2015, nearly 1 ½ years ago.

The Property is not a significant historical resource, and no material impacts to area views will result from the limited rooftop Facility on this one building.

Based on that new information, Verizon therefore requests that the East Los Angeles Area Planning Commission grant the Appeal and approve the Facility and the related MND (ENV-2015-839-MND).

Please include this letter as part of the administrative record for the Facility application. Please let me know if you have any questions about this matter. Thank you.

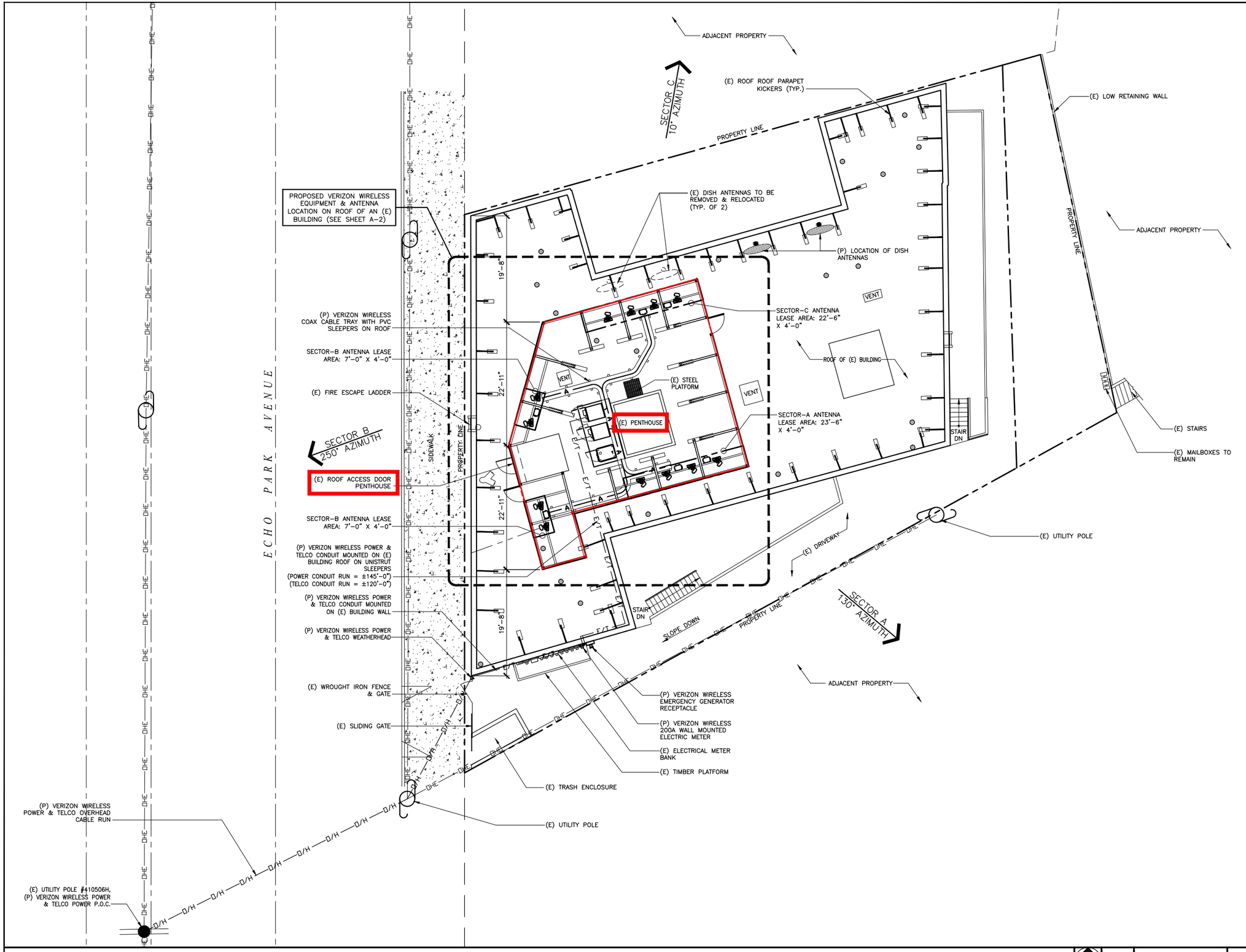
Sincerely,

Kevin P. Sullivan, Esq.

Copies: East Los Angeles Area Planning Commission Members (via email and FedEx)
David Weintraub (via email at david.weintraub@lacity.org)
Harold Arrivillaga (via email at harold.arrivillaga@lacity.org)
Shannon Champion, Esq. (via email)
Glenn Stock (via email)
Jane Collier (via email)
Tricsha Villalta (via email)
Stella Shih (via email)

EXHIBIT 1

EXHIBIT 1



SITE PLAN

NORTH | SCALE 1/8"=1' | 0" 2' 6' 14' | 1

verizon wireless
15505 SAND CANYON AVENUE
BUILDING D, 1ST FLOOR
IRVINE ,CA 92618

PLANS PREPARED BY:
RLS
RELIANT LAND SERVICES
1745 W ORANGEWOOD AVE, STE 103 ORANGE, CA 92868
WWW.RLSUSA.COM PH. (714) 685-0123 FAX (714) 453-9692

CONSULTING GROUP:

NO.	DATE:	DESCRIPTION:	BY:
A	09/26/14	PRELIMINARY ZD	ARC
B	02/26/15	REVISED EQUIPMENT PLAN	ARC
0	03/02/15	100% ZD	ARC
1	05/21/15	REVISED ANTENNA SCREEN WALL	ARC
2	07/14/15	REVISED ANTENNA SCREEN WALL	ARC
3	07/22/15	ADDED NAT'L. GAS GEN. ON ROOF	ARC

SITE INFORMATION:

MORTON

1650 ECHO PARK AVENUE
LOS ANGELES, CA 90026

LOS ANGELES COUNTY

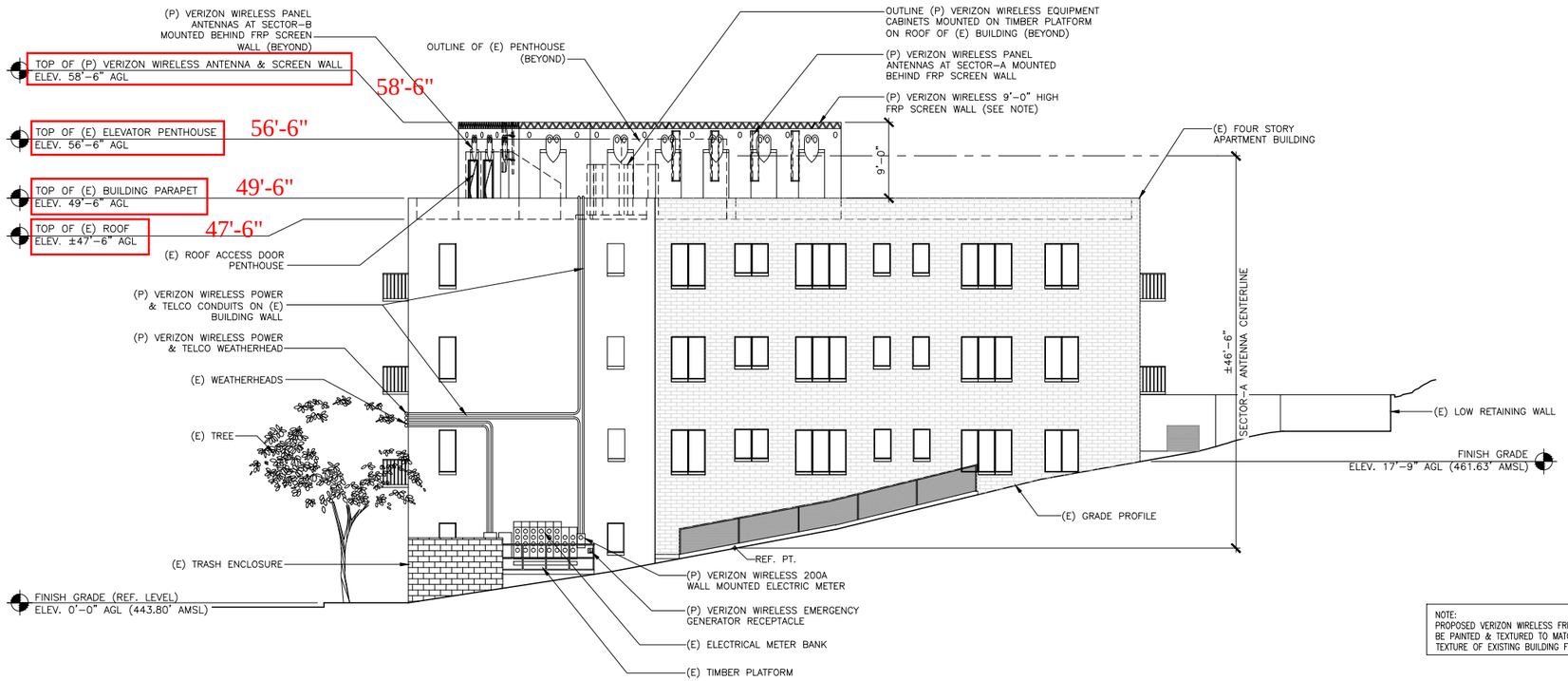
SEAL:

SHEET TITLE:

SITE PLAN

SHEET NUMBER: A-1

REV: 3

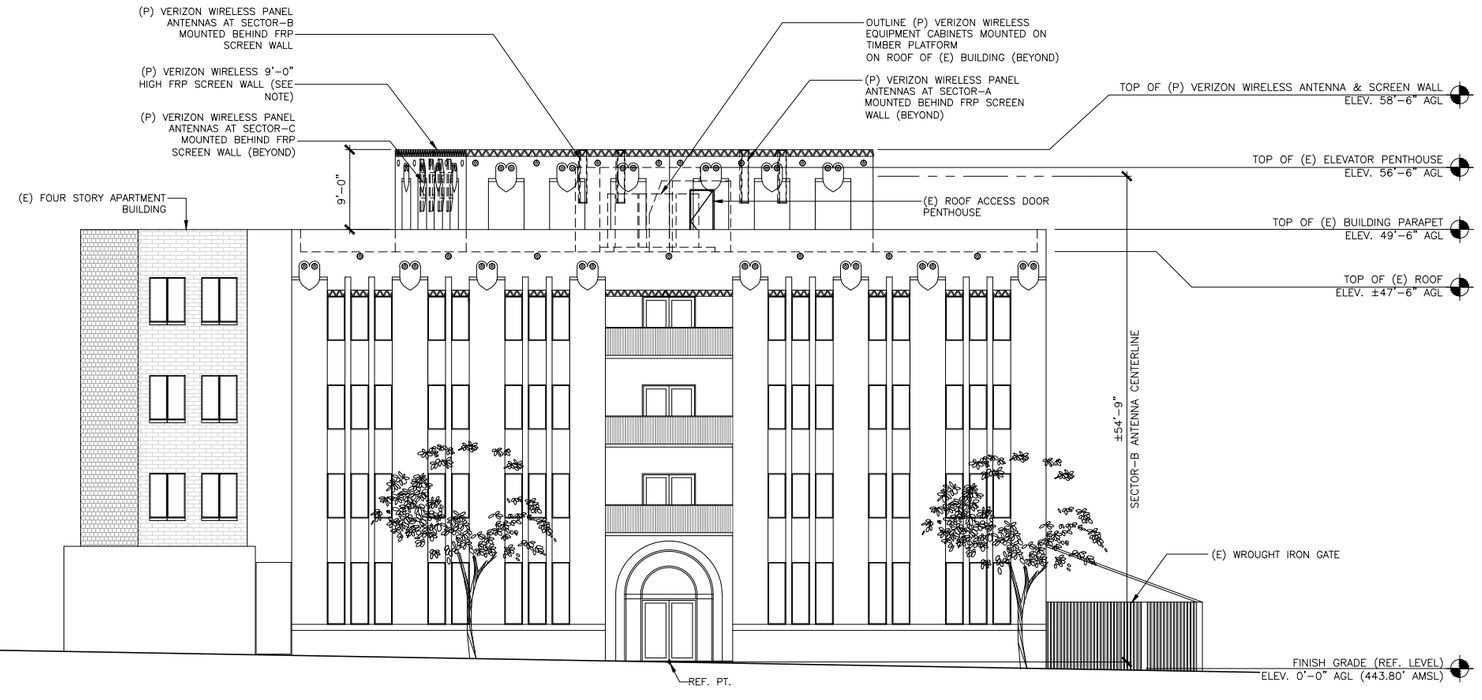


NOTE:
PROPOSED VERIZON WIRELESS FRP SCREEN WALL SHALL BE PAINTED & TEXTURED TO MATCH DESIGN, COLOR & TEXTURE OF EXISTING BUILDING FACADE.

SOUTH ELEVATION

SCALE 1/8"=1' (0" 2' 6' 14')

1



NOTE:
PROPOSED VERIZON WIRELESS FRP SCREEN WALL SHALL BE PAINTED & TEXTURED TO MATCH DESIGN, COLOR & TEXTURE OF EXISTING BUILDING FACADE.

WEST ELEVATION

SCALE 1/8"=1' (0" 2' 6' 14')

2

verizon wireless
15505 SAND CANYON AVENUE
BUILDING D, 1ST FLOOR
IRVINE ,CA 92618

PLANS PREPARED BY:
RLS
RELIANT LAND SERVICES
1745 W ORANGEWOOD AVE. STE 103 ORANGE, CA 92868
WWW.RLSUSA.COM PH. (714) 685-0123 FAX (714) 453-9692

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NO.	DATE:	DESCRIPTION:	BY:
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3	07/22/15	ADDED NAT'L. GAS GEN. ON ROOF	ARC

SITE INFORMATION:

MORTON

1650 ECHO PARK AVENUE
LOS ANGELES, CA 90026

LOS ANGELES COUNTY

SEAL:

SHEET TITLE:

ARCHITECTURAL ELEVATIONS

SHEET NUMBER: **A-3**

REV: 3

EXHIBIT 2

EXHIBIT 2

MORTON

1650 ECHO PARK AVENUE, LOS ANGELES, CA 90026
LOS ANGELES COUNTY

Prepared By:
1745 W. Orangewood Avenue, Suite 103
Orange, California 92868
(714) 685-0123

AERIAL MAP

EXISTING

PROPOSED

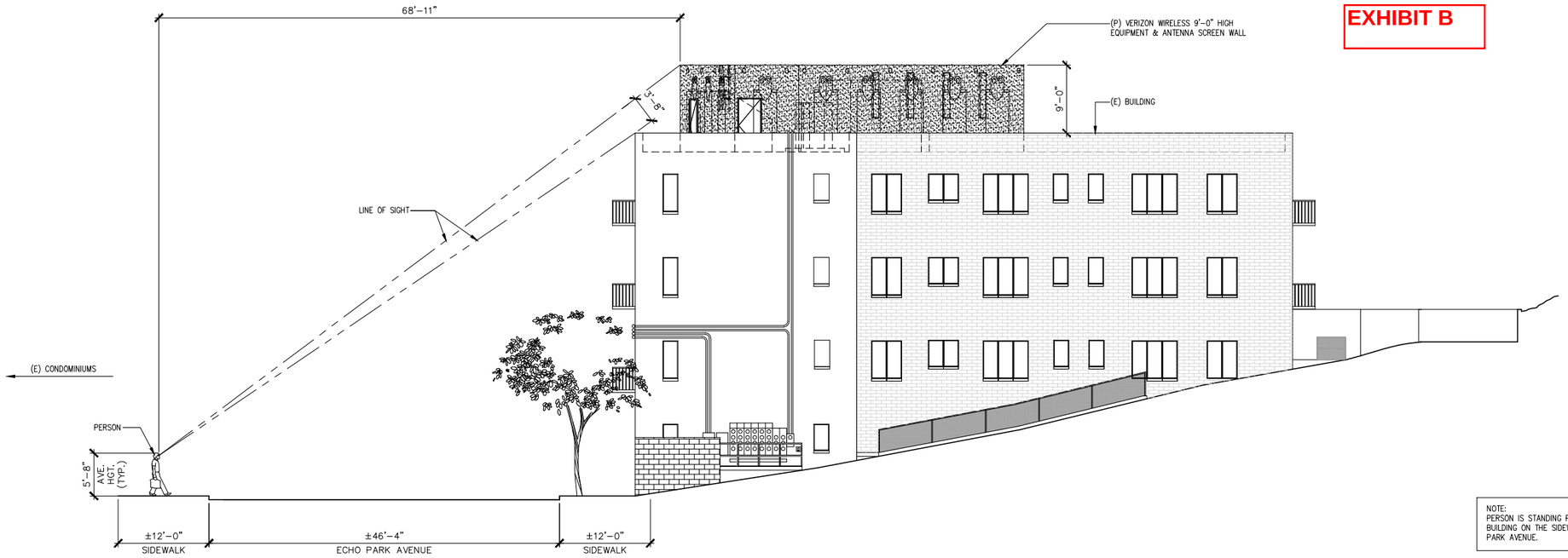
VIEW 1 (Option 2)

Accuracy of photo simulation based upon information provided by project applicant. The proposed installation shown is a substantially accurate artistic representation, but is not intended to be an exact reproduction. The final installation will have cables, cable ports, and various attachments, such as antennas, nuts, and bolts. Every effort willbe made to disguise these components and they will not be readily apparent to the casual observer or passerby. However, upon close scrutiny, the true nature of the installation will be apparent.

EXHIIT 3

EXHIBIT 3

EXHIBIT B

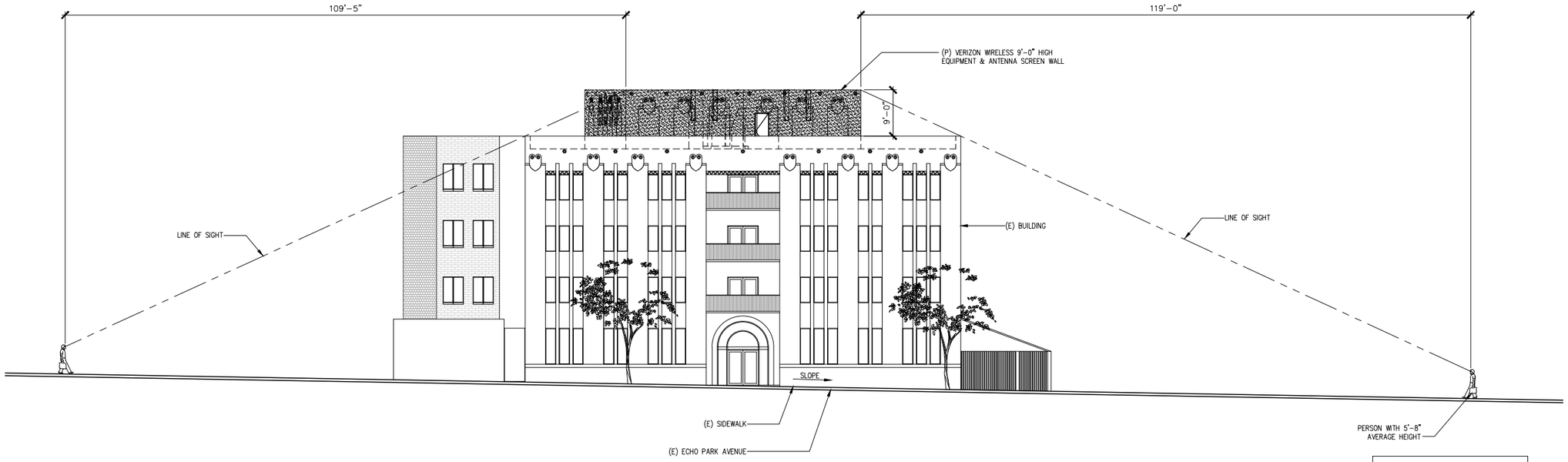


NOTE:
PERSON IS STANDING PERPENDICULAR TO THE BUILDING ON THE SIDEWALK ACROSS ECHO PARK AVENUE.

SOUTH ELEVATION

SCALE 1/8"=1' 0" 2' 6' 14'

1



NOTE:
PERSON IS STANDING AT THE HIGHEST & LOWEST POINT OF THE EXISTING SIDEWALK.

WEST ELEVATION

SCALE 3/32"=1' 0' 2' 6' 14'

2

verizon wireless
15505 SAND CANYON AVENUE
BUILDING D, 1ST FLOOR
IRVINE ,CA 92618

PLANS PREPARED BY:
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1745 W ORANGEWOOD AVE. STE 103 ORANGE, CA 92868
WWW.RLSUSA.COM PH. (714) 685-0123 FAX (714) 453-9692

CONSULTING GROUP:

NO.	DATE:	DESCRIPTION:	BY:
A	09/26/14	PRELIMINARY ZD	ARC
B	02/26/15	REVISED EQUIPMENT PLAN	ARC
0	03/02/15	100% ZD	ARC
1	05/21/15	REVISED ANTENNA SCREEN WALL	ARC

SITE INFORMATION:

MORTON

1650 ECHO PARK AVENUE
LOS ANGELES, CA 90026

LOS ANGELES COUNTY

SEAL:

SHEET TITLE:

LINE OF SIGHT
(OPTION-2)

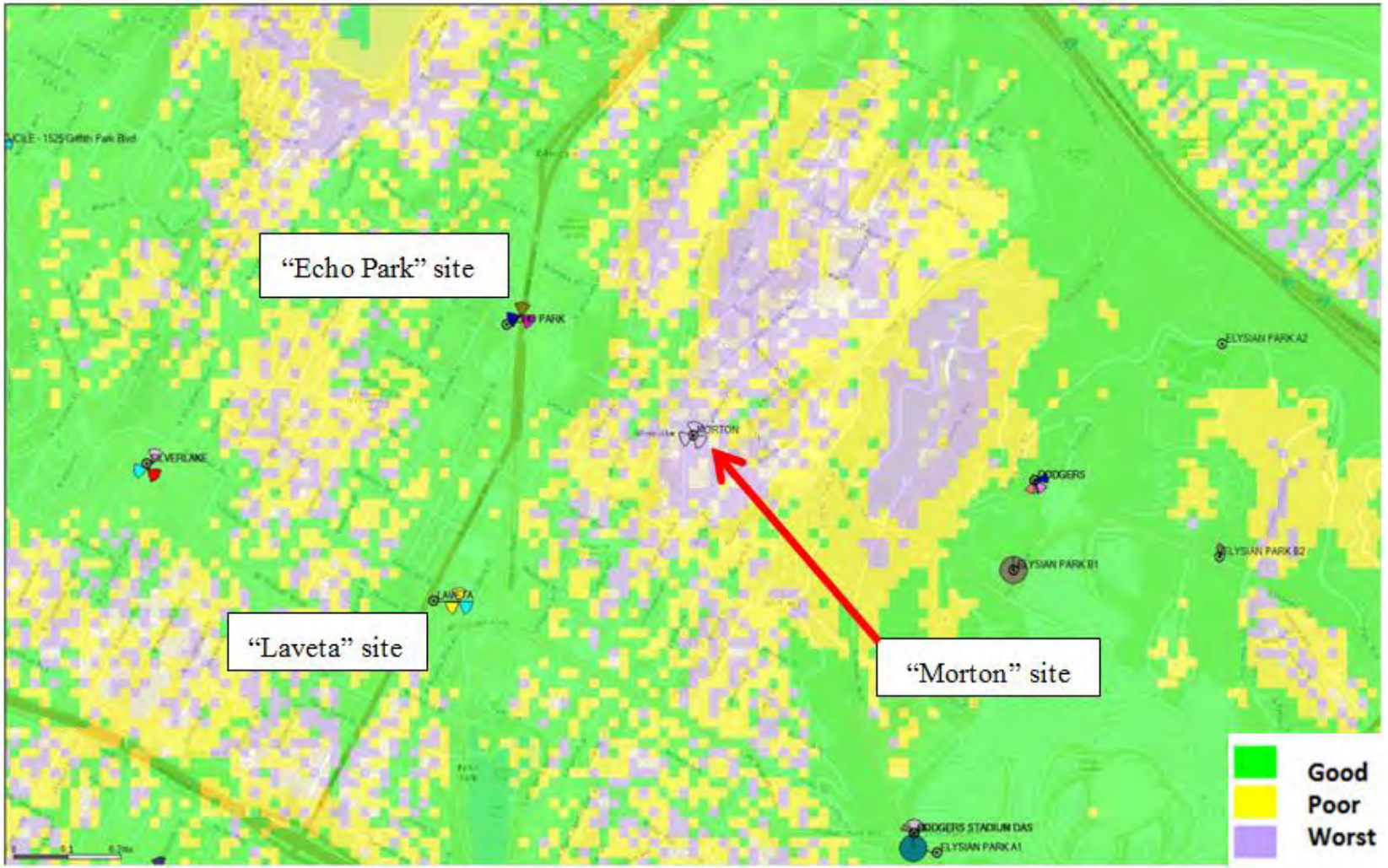
SHEET NUMBER: -

REV: 1

EXHIBIT 4

EXHIBIT 4

Existing Coverage



Existing Coverage w/ Morton

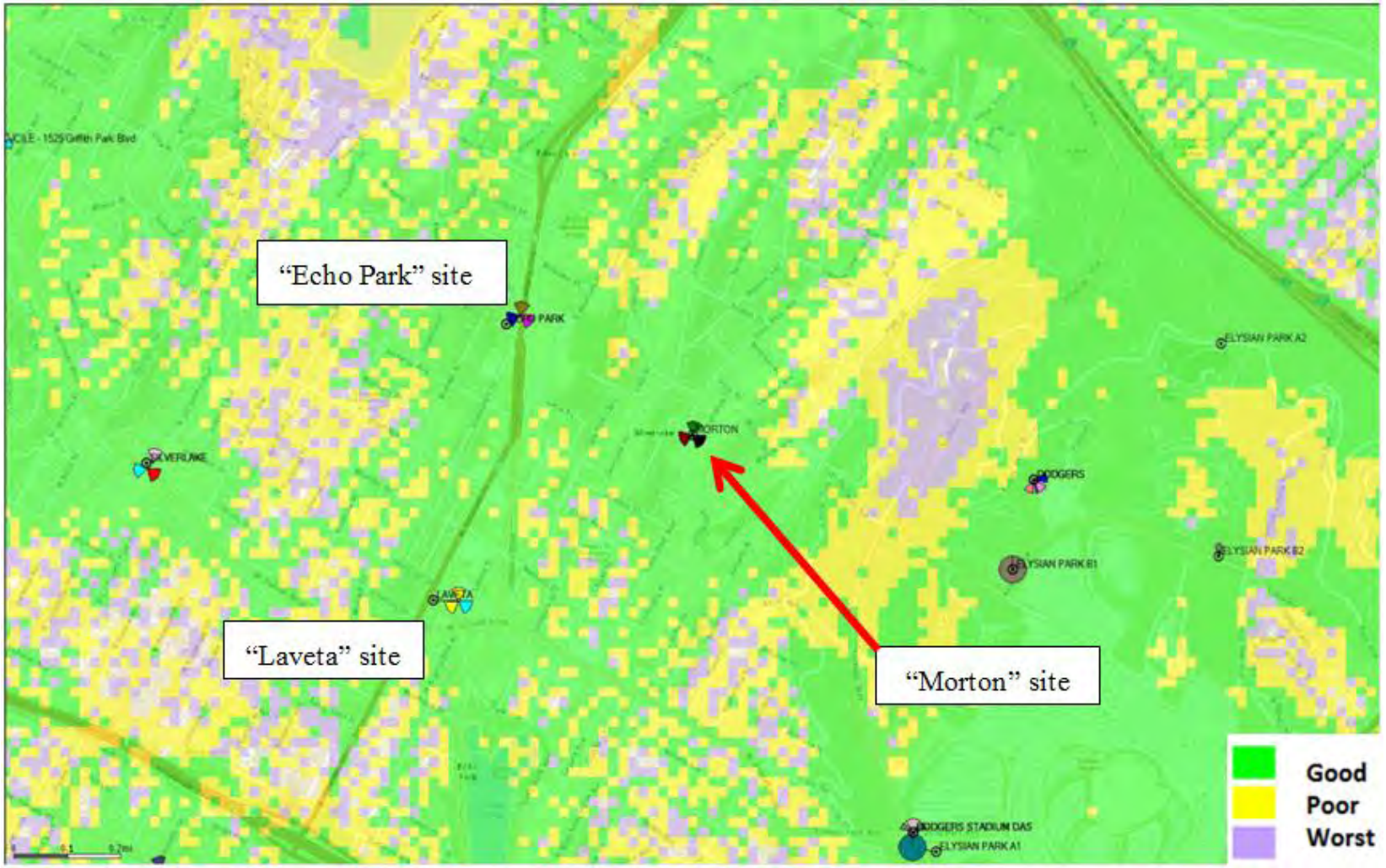


EXHIBIT 5

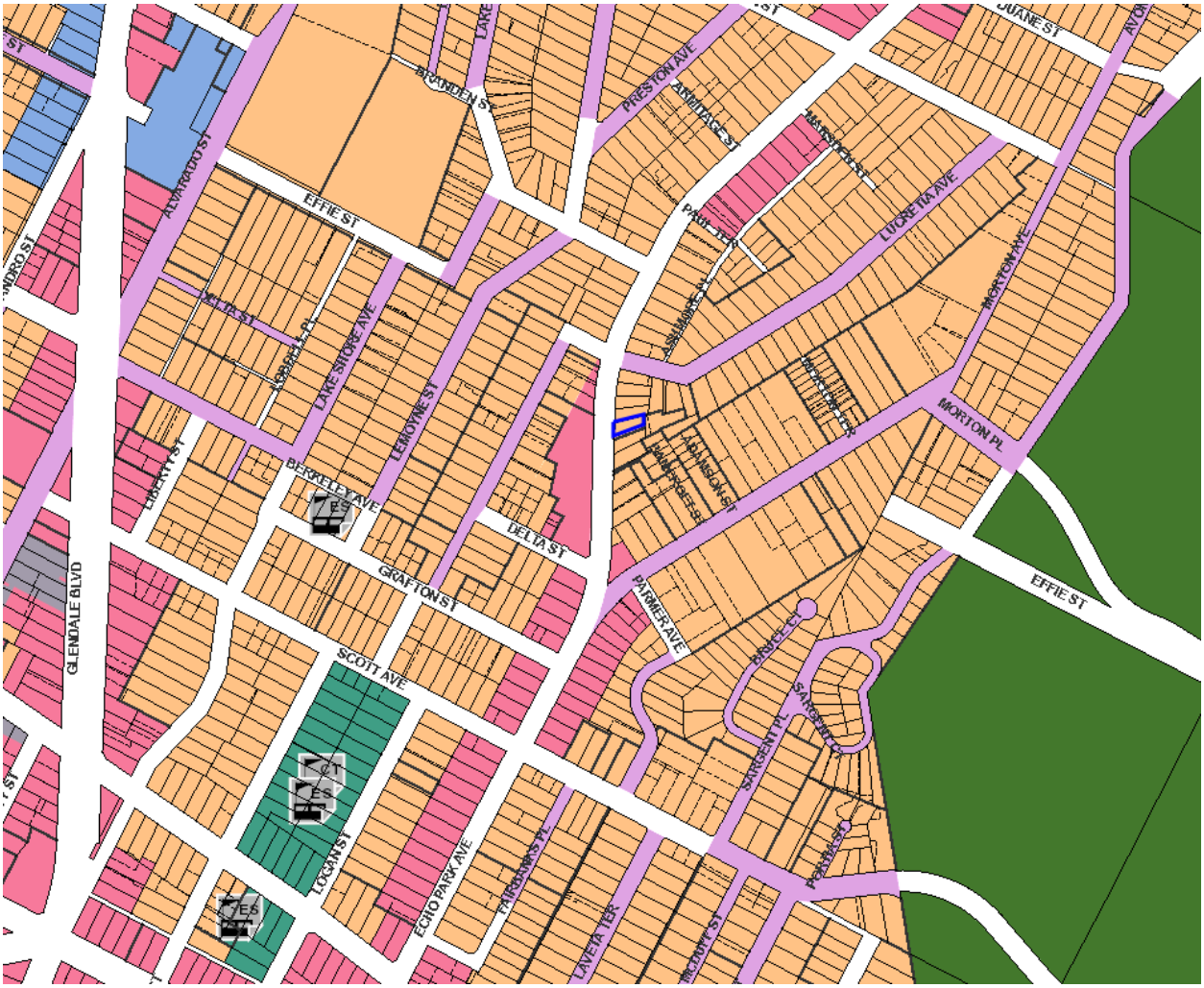
EXHIBIT 5


1650 Echo Park Ave
© 2016 Google
1989
Google earth
34°04'58.32" N 118°15'15.20" W elev 457 ft eye alt 3272 ft

EXHIBIT 6

EXHIBIT 6

Los Angeles City Zoning Map of Echo Park Area:



The project site (Morton) is outline in blue in the center of the map above.

Salmon is Low Medium Residential (R2-Two Family Dwellings; RD1.5- Restricted Density Multiple Dwelling; RD2-Restricted density Multiple Dwelling). Nearly all other residential structures in this Zone were 1-3 story buildings, which do not allow sufficient height for a rooftop facility to meet Verizon's coverage objectives for the community as provided by the Morton site.

Hot Pink is General Commercial and Neighborhood Commercial. All commercial structures in this Zone were 1-2 story buildings, which do not allow sufficient height for a rooftop facility to meet Verizon's coverage objectives for the community as provided by the Morton site.

Blue is Commercial Manufacturing. Verizon's existing Echo Park facility is already located very near the few properties shown in this Zone on the Map. The Morton facility must be sited an appropriate

distance from the Echo Park site for network system operability issues to avoid interference between facilities.

Teal Green is Public Facilities. This is the Logan Street Elementary School. The School District will not lease the site.

Forest Green is Open Spaces. Open space areas are not a preferred location by the City for telecommunications facilities.

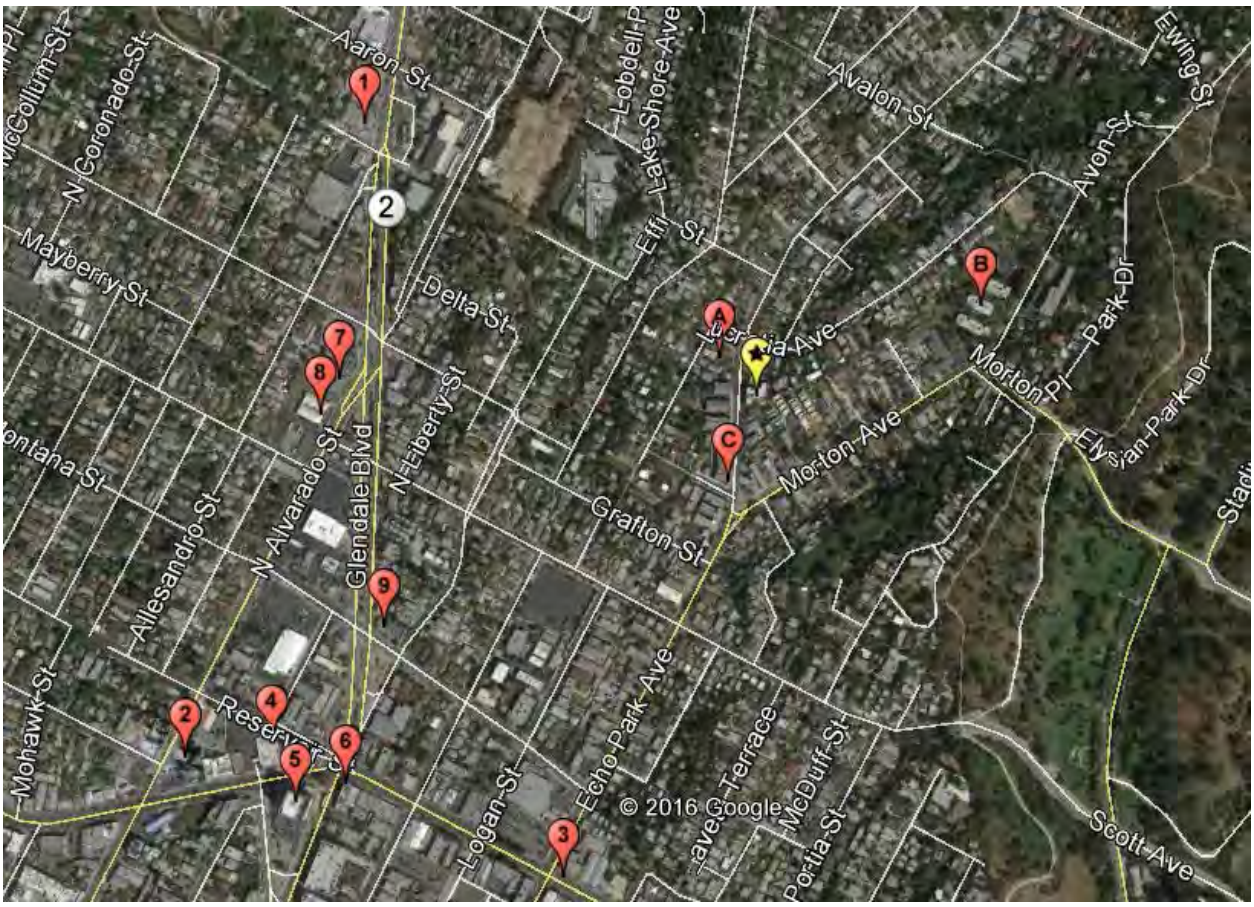
Grey is Community Commercial. All commercial structures in this Zone were 1-2 story buildings, which do not allow sufficient height for a rooftop facility to meet Verizon's coverage objectives for the community as provided by the Morton site.

EXHIBIT 7

EXHIBIT 7

Alternate Site Analysis

The coverage objective is to provide coverage along Echo Park Blvd.



Existing Verizon Wireless Facilities in the area, and co-location efforts.

I. Existing Verizon Sites

1. Verizon Site Name: Echo Park F2
2. Verizon Site Name: Laveta
3. Verizon Site Name: Lemoyne

II. Existing Other Carriers' Sites – co-location efforts and options:

4. 1927 Reservoir St.: This rooftop site is outside of search ring, and is very close to the existing Verizon location at 1204 N. Alvarado St., Laveta. Installing a facility at this location would not meet coverage objectives for the community, and would cause interference with another Verizon site.

5. 1910 W. Sunset Blvd: This rooftop façade mount is outside of search ring, and is very close to the existing Verizon location at 1204 N. Alvarado St., Laveta. Installing a facility at this location would not meet coverage objectives for the community, and would cause interference with another Verizon site.

6. 1830 W. Sunset Blvd.: The rooftop site is outside of search ring, and is very close to the existing location at 1204 N. Alvarado St., Laveta. Installing a facility at this location would not meet coverage objectives for the community, and would cause interference with another Verizon site.

7. 1525 N. Alvarado St., The rooftop site is out of search ring, and is very close to the existing Verizon location at 1717 Glendale Blvd., Echo Park F2. Installing a facility at this location would not meet coverage objectives for the community, and would cause interference with another Verizon site.

8. 1515 N. Alvarado St., This rooftop site is out of search ring, and is very close to the existing Verizon location at 1717 Glendale Blvd., Echo Park F2. Installing a facility at this location would not meet coverage objectives for the community, and would cause interference with another Verizon site.

9. 1400 Glendale Blvd.: This rooftop site is outside of search ring. Installing a facility at this location would not meet coverage objectives for the community.

Verizon Wireless also researched other properties within the area.

A. 1650 Lucretia Ave.: This site was investigated and it was determined that the existing structural elements of the roof would not be able to support cell site. It would be disruptive to existing tenants and occupants, and would be prohibitively expensive, to make the needed significant structural improvements to the roof to support a telecommunications facility.

B. 1815 Morton Ave.: The landlord rejected Verizon's proposal and indicated that continued negotiations would not be productive.

C. 1615 Echo Park Ave.: Ownership of the property is complicated and unclear. Verizon cannot identify with reasonable certainty the appropriate leasing party. Based on the uncertainty about property ownership, Verizon cannot make a significant investment of time and resources to pursue, leasing, permitting (which requires property owner authorization), or possible facility installation at the property.

 Project Site location: 1650 Echo Park Ave.

EXHIBIT 8

EXHIBIT 8

Office of
HISTORIC RESOURCES

What Makes a Resource Historically Significant?

Historic-Cultural Monument designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature. The Cultural Heritage Ordinance establishes criteria for designation; these criteria are contained in the definition of a Monument in the Ordinance. A historical or cultural monument is any site (including significant trees or other plant life located thereon), building, or structure of particular historical or cultural significance to the City of Los Angeles, such as historic structures or sites:

- in which the broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified;
  or
- which are identified with historic personages or with important events in the main currents of national, state, or local history;
  or
- which embody the distinguishing characteristics of an architectural-type specimen, inherently valuable for a study of a period, style, or method of construction;
  or
- which are a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

A proposed resource may be eligible for designation if it meets at least one of the criteria above.

When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria above, the Cultural Heritage Commission and the staff of the Office of Historic Resources often ask the following questions:

- Is the site or structure an outstanding example of past architectural styles or craftsmanship?
- Was the site or structure created by a "master" architect, builder, or designer?
- Did the architect, engineer, or owner have historical associations that either influenced architecture in the city or had a role in the development or history of Los Angeles?
- Has the building retained "integrity"? Does it still convey its historic significance through the retention of its original design and materials?
- Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
- Is the site or structure associated with important movements or trends that shaped the social and cultural history of Los Angeles or its communities?

IN THIS SECTION

- Historic-Cultural Monument Application
- What Does Historic-Cultural Monument Status Mean?
- What Makes a Resource Historically Significant?
- The Historic Designation Process
- Cultural Heritage Ordinance
- Guide to Bronze Plaque Program for Historic-Cultural Monuments
- Designated Historic-Cultural Monuments
- Photo Gallery
- Frequently Asked Questions (FAQs)

Office of Historic Resources, Department of City Planning
200 N. Spring Street, Room 559, Los Angeles, CA 90012
Phone (213) 978-1200 Fax (213) 978-0017

EXHIBIT 9

EXHIBIT 9

Northerly Echo Park & Morton Fork

Southerly Echo Park from Lucretia Ave

Westerly of Delta St from Echo Park Ave

Westerly Grafton St from Echo Park Ave

KEY MAP


Lemoyne St
Echo Park Ave
Della St
Morton Ave
Farmer Ave
L
I
J
K
H
A
B
C
E
D
G
F
© 2016 Google

A: View from 1631 Echo Park Ave

B: View from 1627 Echo Park Ave

H: View from 1668 Echo Park Ave

J: View from Ashmore Place

K: View from East Lucretia Ave

Northerly View 1

Northerly View 3

Easterly View 2

Southerly View 1

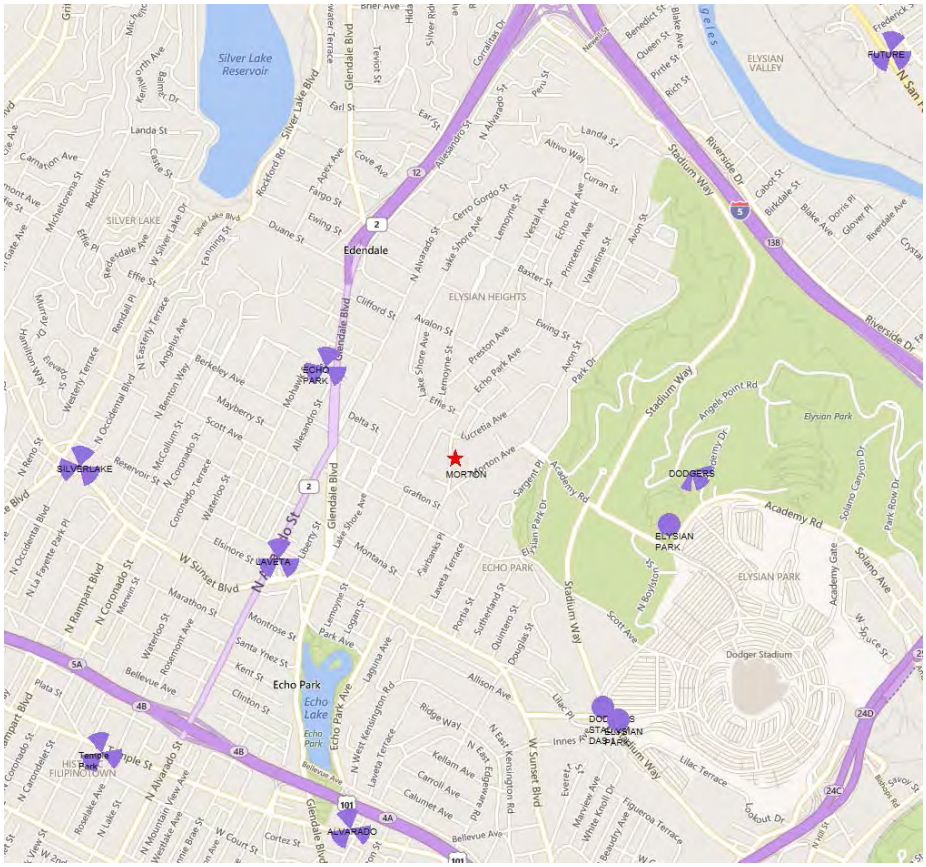
Westerly View 2

verizon

Dear Stella Shih, **April 19, 2016**

This letter is in reference to the proposed VZW telecommunications facility named “Morton,” ZA 2015-0838 (CUW), proposed at 1640 North Echo Park Avenue in the City of Los Angeles. Verizon Wireless has identified a deficiency in its wireless services in the Elysian Heights area and surrounding residential neighborhoods. The deficiency in service was based on modeled propagation maps and traffic data from neighboring sites. Due to the difficult terrain and landscaping challenges in the surrounding area, signal from the neighboring sites such as “Echo Park” and “Laveta” do not provide adequate or reliable coverage to these residential neighborhoods. The poor signal quality that serves this area degrades the user experience by providing slow data speeds, unreliable network access and frequent connection drops. The Verizon Wireless “Morton” project was strategically placed to resolve the coverage deficiencies and improve network reliability to the Verizon Wireless customers in the area.

Figure 1 – Vicinity Map (Proposed Site Indicated by Red Star)



Coverage Gap vs Capacity Needs

There are two main drivers that prompt the need for a new cell site. One is coverage and the other is capacity.

Coverage is the need to expand wireless service into an area that either has no service or bad service. The request for service often comes from customers or emergency personnel. Expansion of service could mean improving the signal levels in a large apartment complex or new residential community. It could also mean providing new service along a newly built highway.

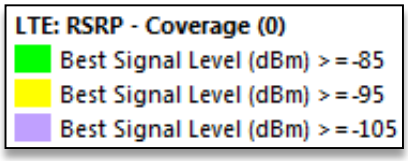
Capacity is the need for more wireless resources. Cell sites have a limited amount of resources to handle voice calls, data connections, and data volume. When these limits are reached, user experience quickly degrades. This could mean customers may no longer be able to make/receive calls nor be able to browse the internet. It could also mean that webpages will be very slow to download.

Capacity is the amount of resources a cell site has to handle customer data demands. We utilize sophisticated programs that use current usage trends to forecast future capacity needs. Since it takes an average of (1-3) years to permit and construct a cell site project, we have to start the acquisition process several years in advance to ensure the new cell site is in place before the existing cell site hits capacity limits.

Location, Location, Location. A good capacity cell site needs to be in the center of the user population which ensures even traffic distribution around the cell. A typical cell site is configured in a pie shape, with each slice (aka. sector) holding 33% of the resources. Optimal performance is achieve when traffic is evenly distributed across the 3 sectors.

Currently, the existing Verizon facilities (known as Laveta and Echo Park) near the proposed Morton site are experiencing data processing capacity stresses and degradation due to existing customer demands. There are currently excessive amounts of dropped calls, slow data processing speeds, and general service degradation in the area served by those two sites. Installation of the Morton site is necessary to avoid breaching system capacity limits in the area, which would result in very poor and ineffective system operations.

Defining RSRP Level



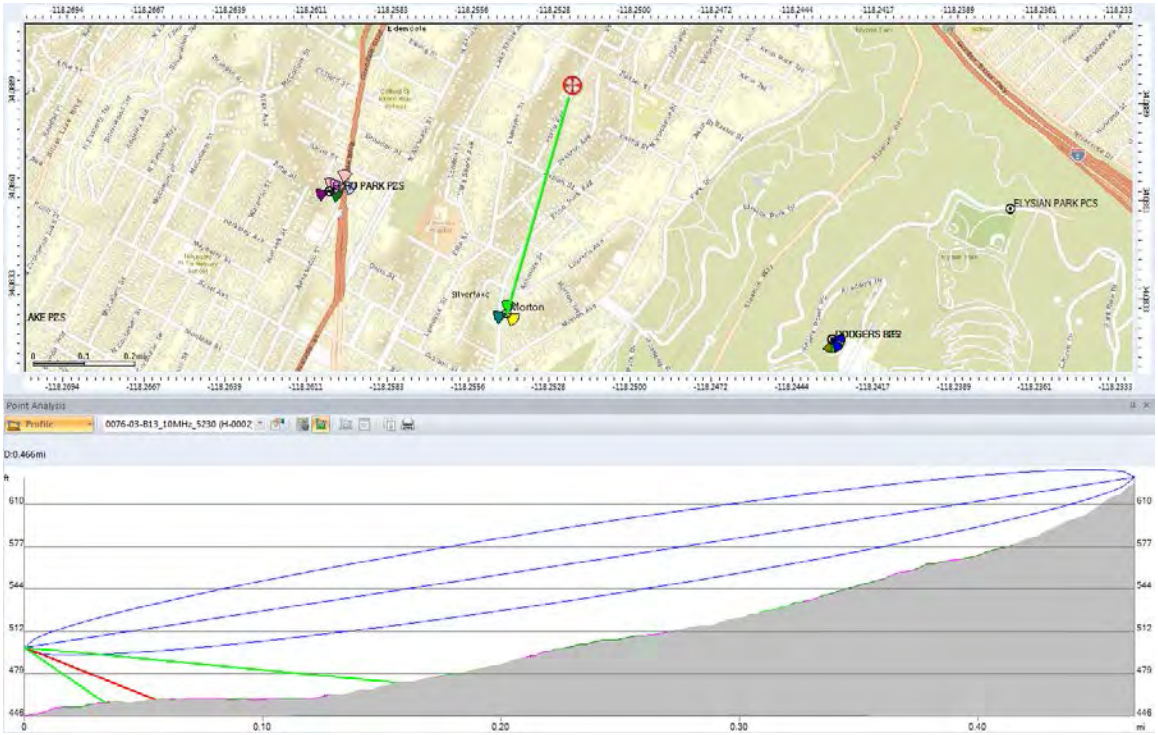
RSRP(Radio Signal Receive Power) level of -85 to -95 would be considered moderate coverage. If a user has a signal within this range they are able to reliably hold a network connection on the street level while mobile, this signal strength is strong enough to provide users service through the attenuation from their vehicle. Coverage will be weaker in-building and may not be as reliable as the in-vehicle service. Vehicles are enclosed in conductive metals that attenuate the RF signal to a device, however it is a fairly compact space surrounded but windows and the windshield that have very little metal embedded. Attenuation is the reduction of radio frequency intensity after passing through a material. In contrast, a home is much larger; users in the center of the home , garage , basement will not have the same service reliability due to further attenuation created by the structure. Even users near the window may have poor signal depending on the location of the cell site. If the site is facing the north-west corner of the home and a user is near the south-east window, then the signal is being attenuated by multiple walls of the home before reaching the user.

RSRP(Radio Signal Receive Power) level of -95 to -105 would be considered marginal coverage. The signal is weak, but a user can hold a connection to the network at this signal range if outdoors. Users at the highest end of this signal range may even be able to hold a network connection in their vehicle in some very unique scenarios where terrain / dense foliage / multi-level homes or buildings are not an issue. In-building coverage is typically extremely weak to non-existent. Issues covered in the -105 and lower signal range are also experienced at this level.

RSRP(Radio Signal Receive Power) level of -105 to -110 is the lowest possible signal range allowable to connect to the network if the user can connect at all. When a connection is this fragile not only will the user experience very slow data speeds, but the slightest level of additional attenuation will cause a connection drop / failure. Customer experience suffers in a poor signal area as well as the network as a whole.
Data speeds slow in low coverage areas because the cell site has difficulty communicating to the mobile to transmit information which causes the site to send redundant packages over and over again until the mobile has all the packets necessary to fulfil a typical user request such as loading a map or web page. This additional time the user is being served by this site requires more resources than are typically allocated for a single request from the cell site (time and capacity) which are finite. If this issue is multiplied by a sufficient number of users then a site can actually exhaust all of its resources which affects all users, including customers with good signal strength. The concept is similar to congestion on a highway. Imagine the highway is the cell site, the 4 – 5 driving lanes are the users available data streams(capacity). If all drivers travel at the same speed then the highway can be full and still work efficiently, however if the amount of drivers that are traveling slowly and for longer distances(time and capacity) they can slow the speed of all other highway travelers. Even drivers that have to travel short distances are slowed by those going further and will need to stay on the highway longer to get to their destination.

The proposed Morton site is a capacity and coverage site. This site will improve coverage in the higher elevations to the east of Echo Park and Laveta. The "Morton" candidate provides the height we need in order to effectively provide coverage to homes up the hills and to clear adjacent buildings. This is the only candidate in the vicinity that meets this criteria. The residential homes with poor coverage up the hill are up to 100' in elevation above the rooftop of the Morton site. Because of the terrain, our existing sites are significantly blocked and cannot serve the area effectively (see Figure 2).

Figure 2 – Terrain Profile



Also, the candidate is strategically placed at the bend of the road to provide coverage along the main street to the Elysian Heights neighborhood to the North as well as the Echo Park area to the South. Echo Park Ave hosts several commercial buildings (restaurants and local shops) and is the main road to the different neighborhoods. This location allows us to work around the terrain challenges. Figures 3 and 4 below show the coverage without and with the "Morton" site, respectively.

Figure 3 – Existing Coverage

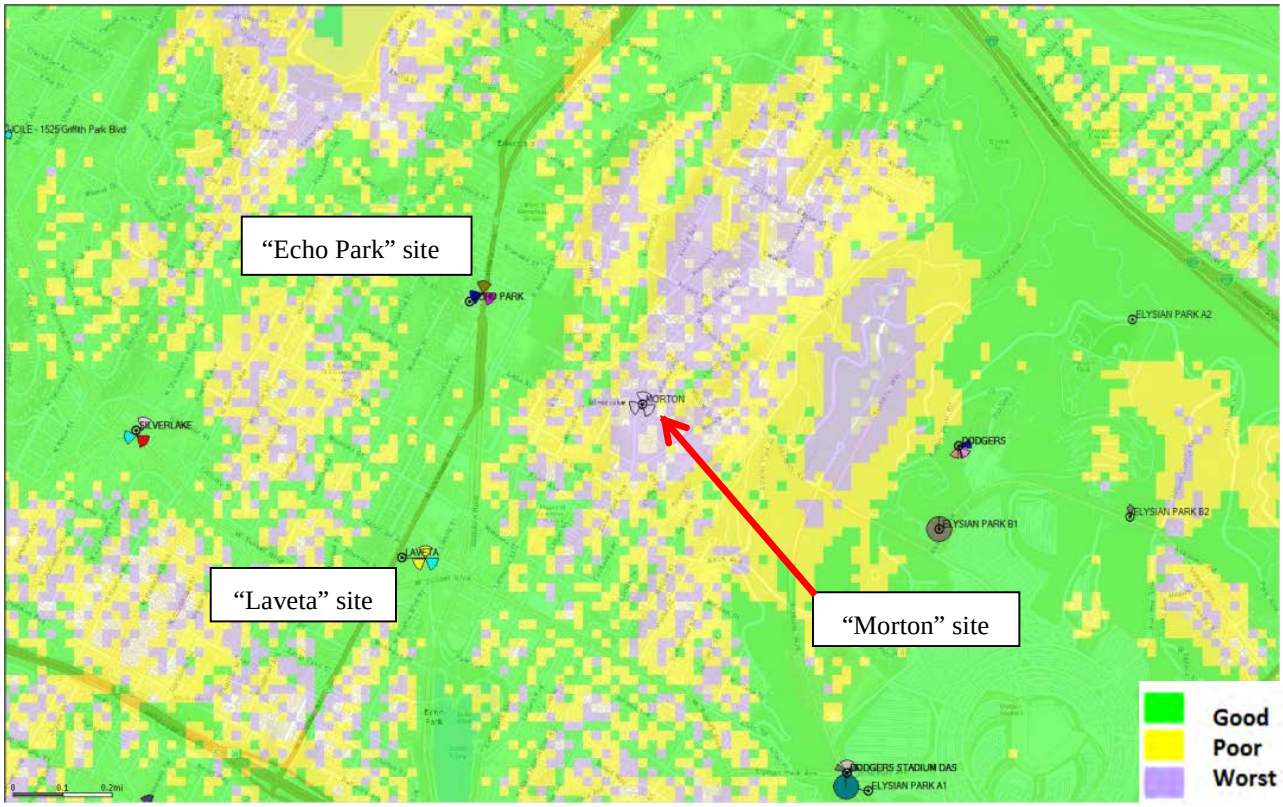


Figure 4 – Proposed Coverage Improved with New Site

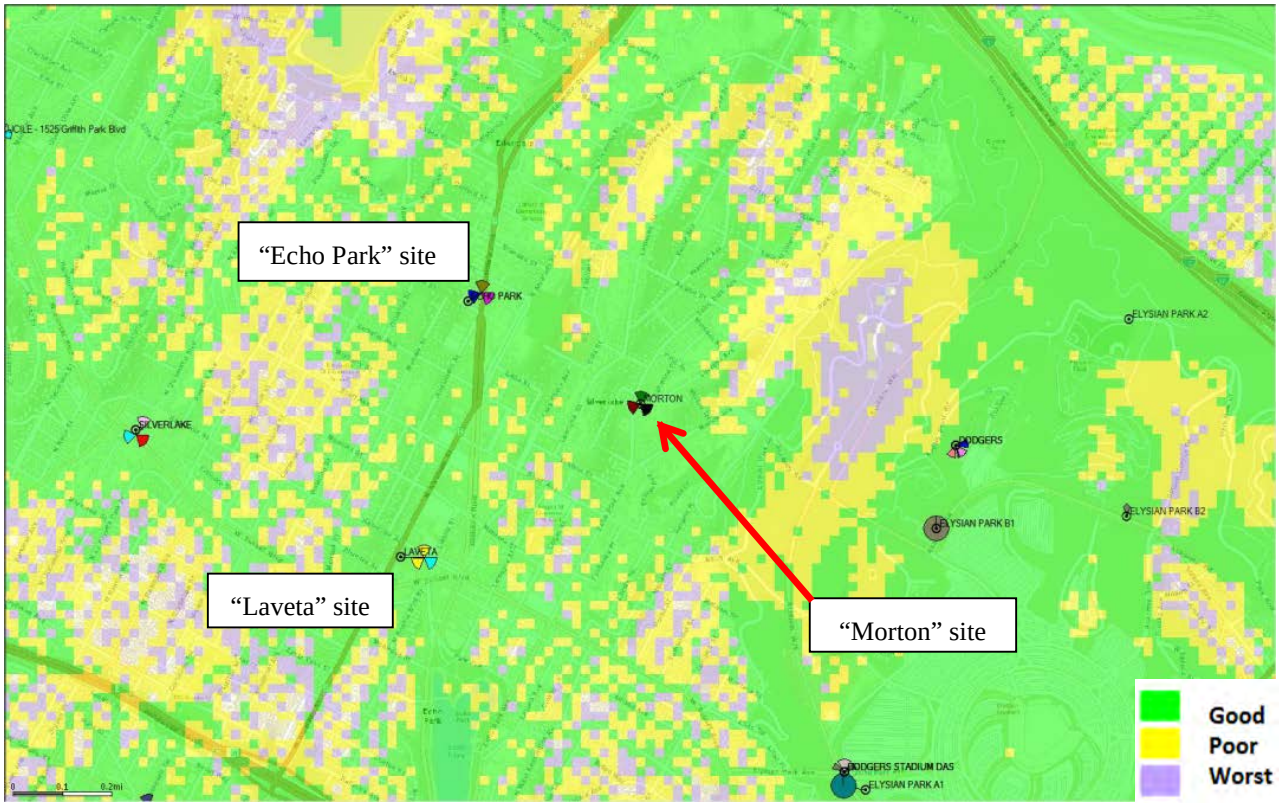


Figure 5 shows the best serving sectors currently in the area. Each color represents an area where a sector is the dominant server. This means that a particular sector has the best signal level and quality in the area amongst any adjacent sectors. The area surrounding "Morton" is currently being served by Echo Park and Laveta. Due to the terrain, most of the signal near "Morton" is weak (see Figure 3) and the user is forced to communicate with the surrounding sites.

Figure 5 – Existing Coverage

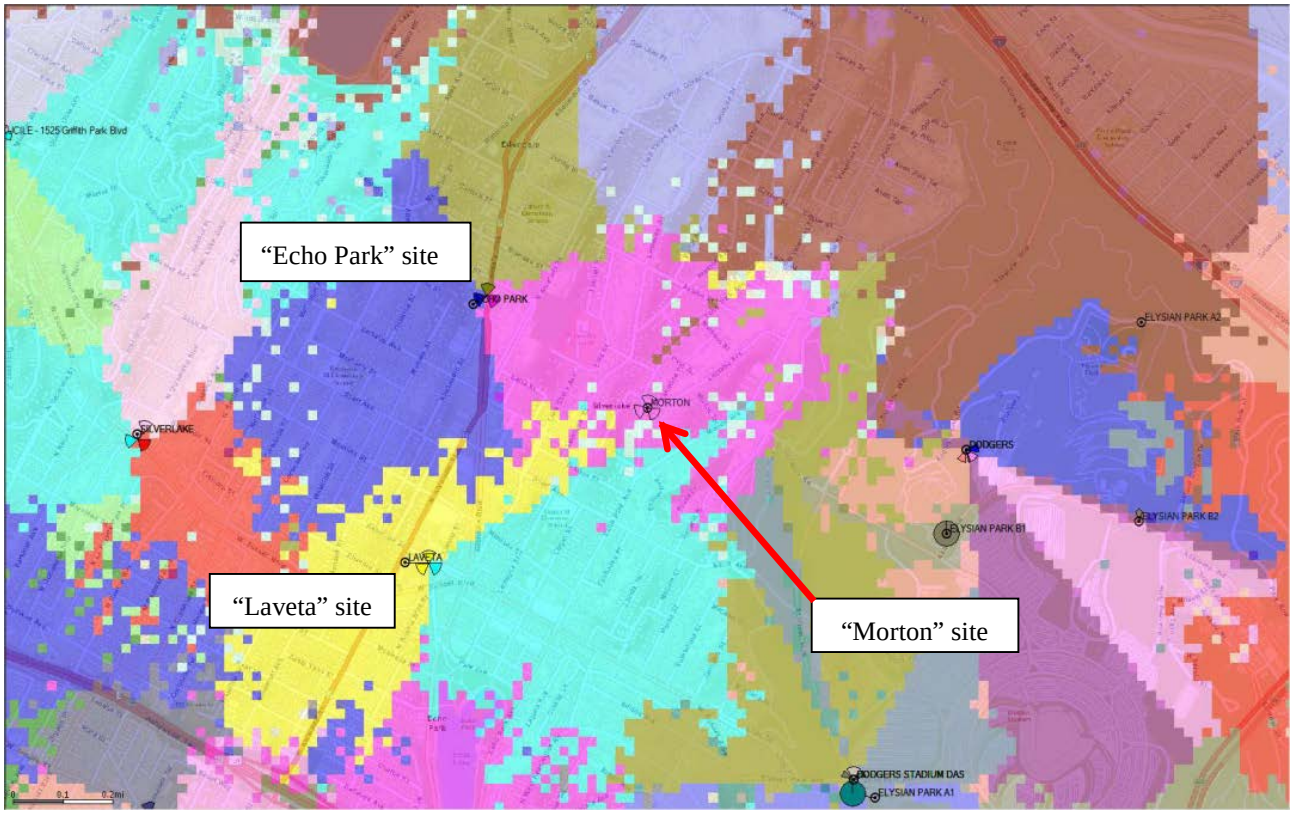
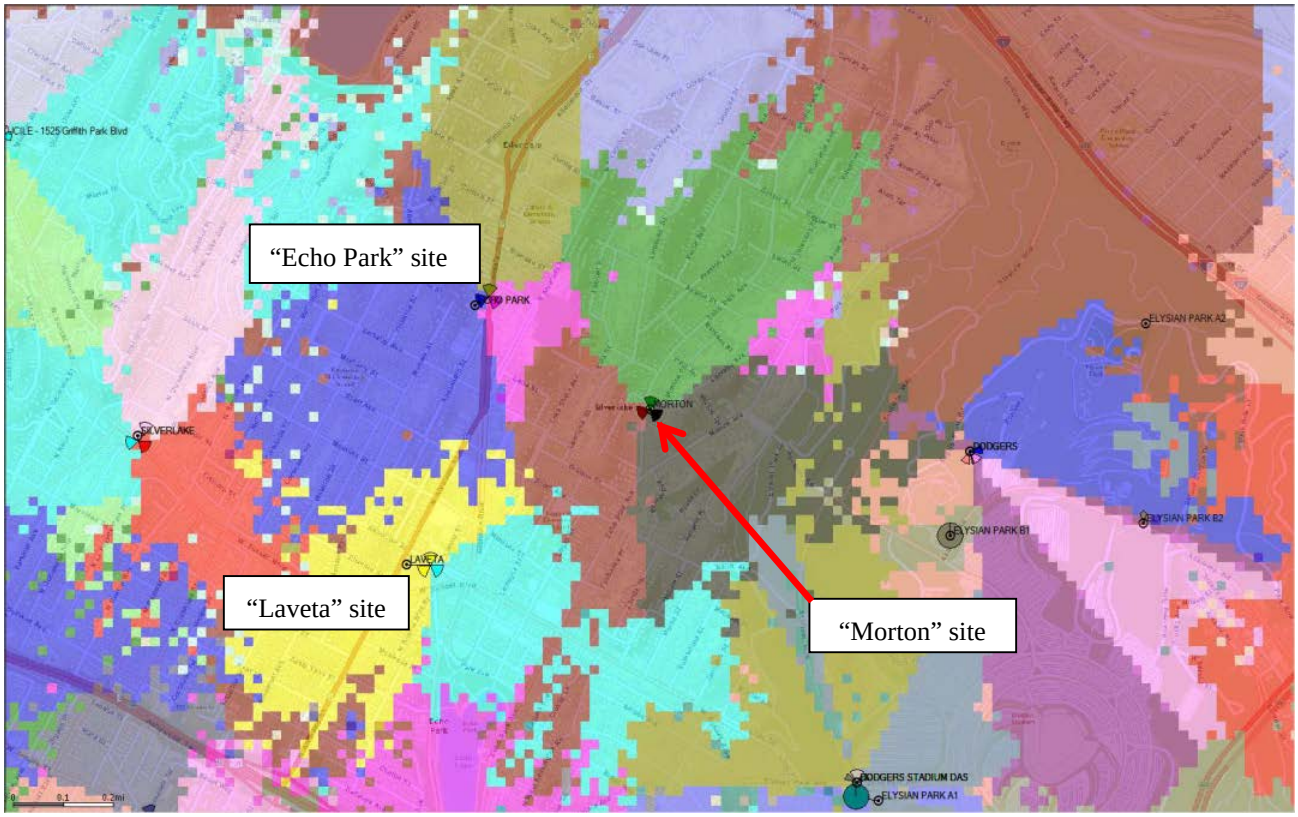


Figure 6 – Proposed Coverage with New Site

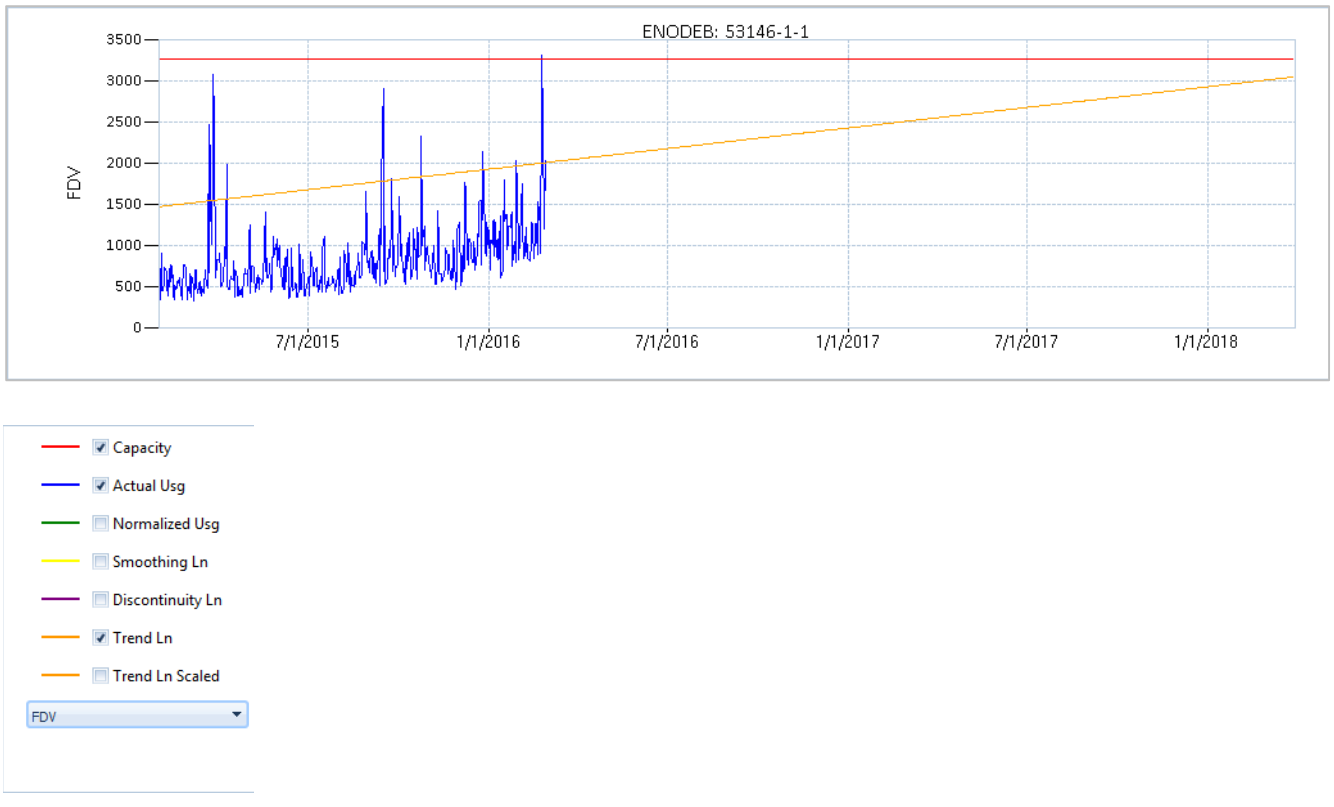


Capacity Forecast

Based on an analysis of usage trends and near term capacity forecasts, the Echo Park site is forecasted to be at capacity in 2018. "At capacity" means that a site has exhausted all of its resources to reliably support voice calls and data usage.

The chart below (Figure 7) shows capacity at Echo Park is currently being reached sporadically, so customers/users already have degraded service. The chart shows the data processing baseline demand for Echo Park (near the proposed Morton site) is steadily growing and is expected to spike above the "capacity" line more frequently beginning later this year. Service in the area around the Echo Park site currently is poor due to experienced dropped calls and slow data processing speeds, and will get worse if the proposed Morton site is not installed and the Echo Park facility reaches capacity limits as forecast in 2018. Installation of the Morton site therefore will substantially improve data delivery speeds and call reliability for area customers.

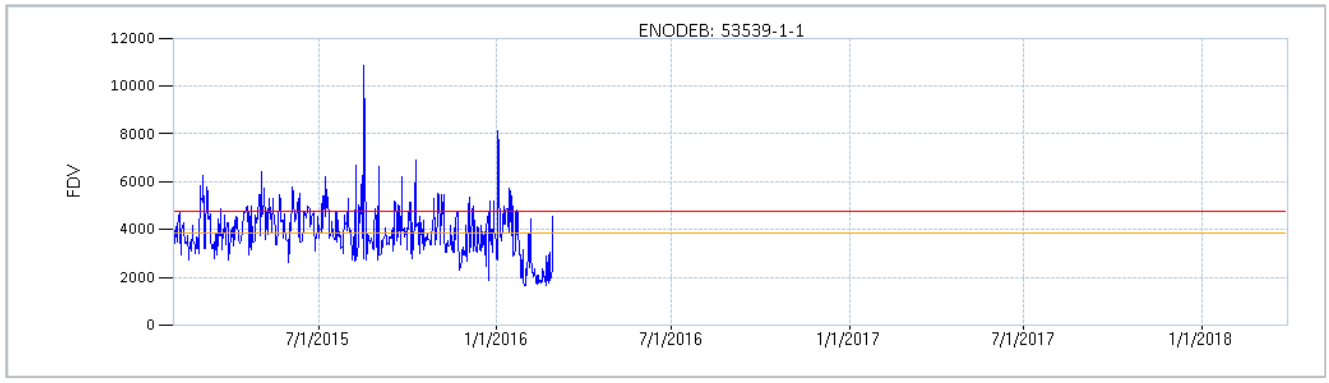
Figure 7 – Capacity Forecast for site "Echo Park"

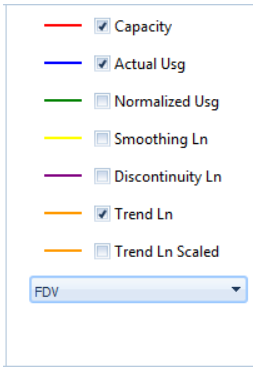


Based on an analysis of usage trends and near term capacity forecasts, the Laveta site is already hitting capacity and customers/users have degraded service now.

The chart below (Figure 8) shows the Laveta site already has a highly elevated data processing baseline with an average constant very near capacity limits for the facility. Customer data demands at the Laveta site frequently exceed the "at capacity" level, often substantially exceeding it. This means that customers in the area routinely experience dropped calls, poor service and very slow data processing speeds. The Morton site is needed now to offload the capacity stresses already experienced at the Laveta facility. Installation of the Morton site therefore will substantially improve data delivery speeds and call reliability for area customers.

Figure 8 – Capacity Forecast for site "Laveta"





Safety of Verizon Wireless

A common question we hear on our wireless site projects is "Are the radio emissions safe?"

We go to great effort to ensure that all our projects meet the regulations set by the FCC to ensure safety of the public and our employees.

In addition, the FCC and other organizations have determined, based on review of scientific studies, that mobile service base stations are safe. Information about the health safety of such facilities includes:

- American Cancer Society - *http://www.cancer.org/cancer/cancercauses/othercarcinogens/athome/cellular-phone-towers* ("Public exposure to radio waves from cell phone tower antennas is slight for several reasons. The power levels are relatively low, the antennas are mounted high above ground level, and the signals are transmitted intermittently, rather than constantly.

  At ground level near typical cellular base stations, the amount of RF energy is thousands of times less than the limits for safe exposure set by the US Federal Communication Commission (FCC) and other regulatory authorities. It is very unlikely that a person could be exposed to RF levels in excess of these limits just by being near a cell phone tower.")

- FCC Radio Frequency Safety - *http://www.fcc.gov/general/radio-frequency-safety-0* and *https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety#Q15* ("The RF emissions from cellular or PCS base station antennas are generally directed toward the horizon in a relatively narrow pattern in the vertical plane. In the case of sector (panel) antennas, the pattern is fan-shaped, like a wedge cut from a pie. As with all forms of electromagnetic energy, the power density from the antenna decreases rapidly as one moves away from the antenna. Consequently, ground-level exposures are much less than exposures if one were at the same height and directly in front of the antenna.")

- World Health Organization - *http://www.who.int/peh-emf/about/WhatisEMF/en/index1.html* (Telecommunications base stations add little to the total ambient radio frequency signals as signal strengths are typically similar to or lower that signal strengths from distant radio and TV stations.)

Capacity

In addition to the unreliability and poor performance observed by the users in weak/poor signal conditions, it also puts a stress on the effective capacity of the surrounding sites. When a cell site serves a mobile/device in poor conditions, it must use up more time and spectrum resources in order to try and deliver the user content reliably. This uses up the limited physical resources quickly and can deprive other users connected to the site from gaining access to those resources impacting user experience for all customers in the area. Currently, Verizon Wireless has modified its adjacent facilities in an effort to maximize the available capacity; however, increased demand for voice and data services has already outstripped the capacity of adjacent sites such as "Echo Park" and "Laveta". The area requires a dominant signal provided by a site that can provide a strong signal above the average noise and interference levels. Due to the terrain composition in the area the current "Morton" candidate was the only viable solution to provide the required signal level and quality to effectively offload the neighboring sites. Achieving capacity exhaustion severely compromises the Verizon Wireless network, leading to failed call attempts, dropped calls, poor call quality and slow data speeds (the "Capacity Gap").

Emergency 911 Services

As more of our voice calls move from CDMA to LTE, maintaining good LTE coverage becomes more important for e911. CDMA is Verizon's 3G technology mostly used for voice calling and small data usage. LTE is 4G technology focusing more on high-speed data transfer and, more recently, voice calling. In order to provide better call quality, voice calling, in the near future, will primarily be made using LTE. Also, upcoming phones will start being released as LTE-only. If an area has poor or no LTE coverage, the likelihood of placing a 911 call is greatly impacted. The user would likely experience call issues such as dropped calls and audio gaps and may even not be able to make a call. During emergencies where multiple users need to make a call, the network would be clogged due to the lack of resources.

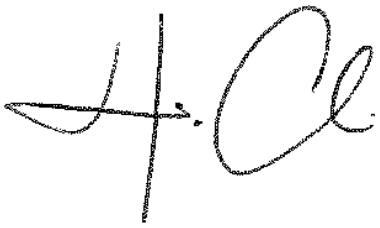
Verizon makes it a priority to ensure our customers have reliable access to make calls during any type of emergency.

Telecommunications networks are recognized to be integral to the use of the 911 emergency system. As of 2011, the Federal Communications Commission ("FCC") found that **about 70% of all Emergency 911 calls originated from wireless devices**, and that percentage will continue to increase. (FCC Consumer and Governmental Affairs Bureau, Wireless 911 Services Fact Sheet (originally issued Feb. 1, 2011) (updated version found at https://transition.fcc.gov/cgb/consumerfacts/wireless911srvc.pdf)). One of the main reasons that many people own a wireless phone is the ability to call 911 for help in an emergency.

Summary

As an RF Design Engineer with over 2.5 years of experience, I have spent that that time working in the Los Angeles market where I designed and analyzed siting considerations for over 100 telecommunications facility sites. I received my BSEE in Electrical Engineering from the University of California Los Angeles. After analyzing the traffic & performance data, coverage plots and local knowledge of the area, it is my professional judgement that the current location and design of the "Morton" project is vital for improving the network reliability, service and performance to the surrounding Echo Park and Elysian Heights areas near Dodgers Stadium. Neighboring sites and projects cannot provide adequate coverage due to terrain challenges in the area.

Regards,
Hans Calinaya



RF Design Engineer
Verizon Wireless – Southern California

April 19, 2016

PLOT PLANS &
OTHER PLANS

Los Angeles Department of City Planning

Case No. ZA 2015-838 (CUW)

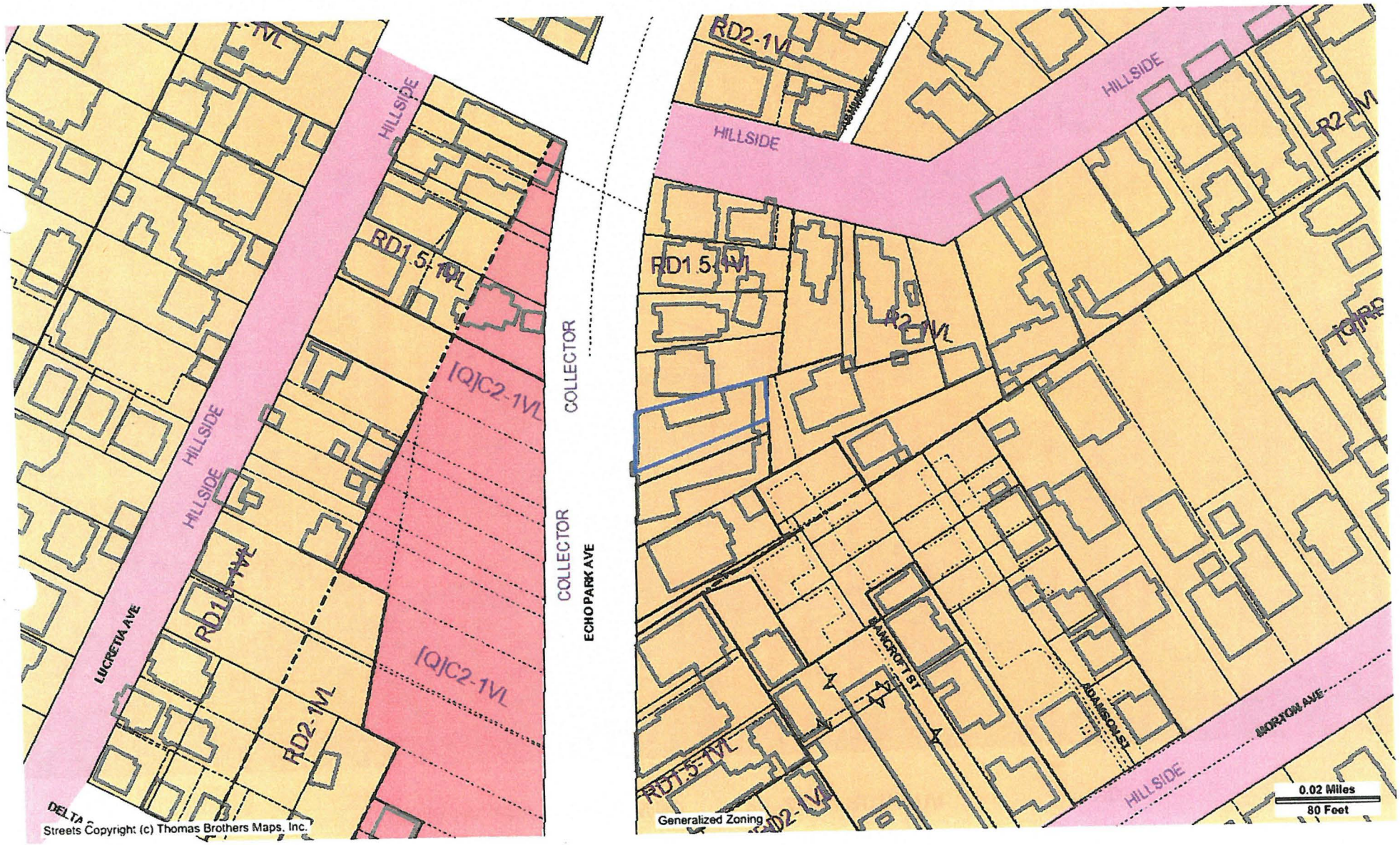
Address: 1650 North Echo Park Avenue

CD: 13

CEQA No. ENV 2015-839-MND

Zone: RD1.5-1VL

HD:



Images taken on 9/28/15 at approximately 4:00 p.m.

Los Angeles Department of City Planning

Case No. ZA 2015-838 (CUW) | **Address: 1650 North Echo Park Avenue** | **CD: 13**

CEQA No. ENV 2015-839-MND | **Zone: RD1.5-1VL** | **HD:**

Images taken on 9/28/15 at approximately 4:00 p.m.

Los Angeles Department of City Planning

Case No. ZA 2015-838 (CUW)	**Address: 1650 North Echo Park Avenue**	**CD: 13**
CEQA No. ENV 2015-839-MND	**Zone: RD1.5-1VL**	**HD:**

Looking south on Echo Park Ave,
at front of subject site

Images taken on 9/28/15 at approximately 4:00 p.m.

Los Angeles Department of City Planning

Case No. ZA 2015-838 (CUW)	**Address: 1650 North Echo Park Avenue**	**CD: 13**
CEQA No. ENV 2015-839-MND	**Zone: RD1.5-1VL**	**HD:**

Looking east at front of subject site

Images taken on 9/28/15 at approximately 4:00 p.m.

Los Angeles Department of City Planning

Case No. ZA 2015-838 (CUW)	**Address: 1650 North Echo Park Avenue**	**CD: 13**
CEQA No. ENV 2015-839-MND	**Zone: RD1.5-1VL**	**HD:**

Looking north on Echo Park Ave,
at front of subject site

Images taken on 9/28/15 at approximately 4:00 p.m.

RADIUS MAP

CONDITIONAL USE - Z.A.

LEGAL: LOTS 2, 5, 6, AND PORTION OF LOT 1, PAULI TRACT, M.B. 17-167. (SEE APPLICATION)

C.D. 13
C.T. 1973.00
P.A. SILVER LAKE-ECHO PARK-ELYSIAN VALLEY

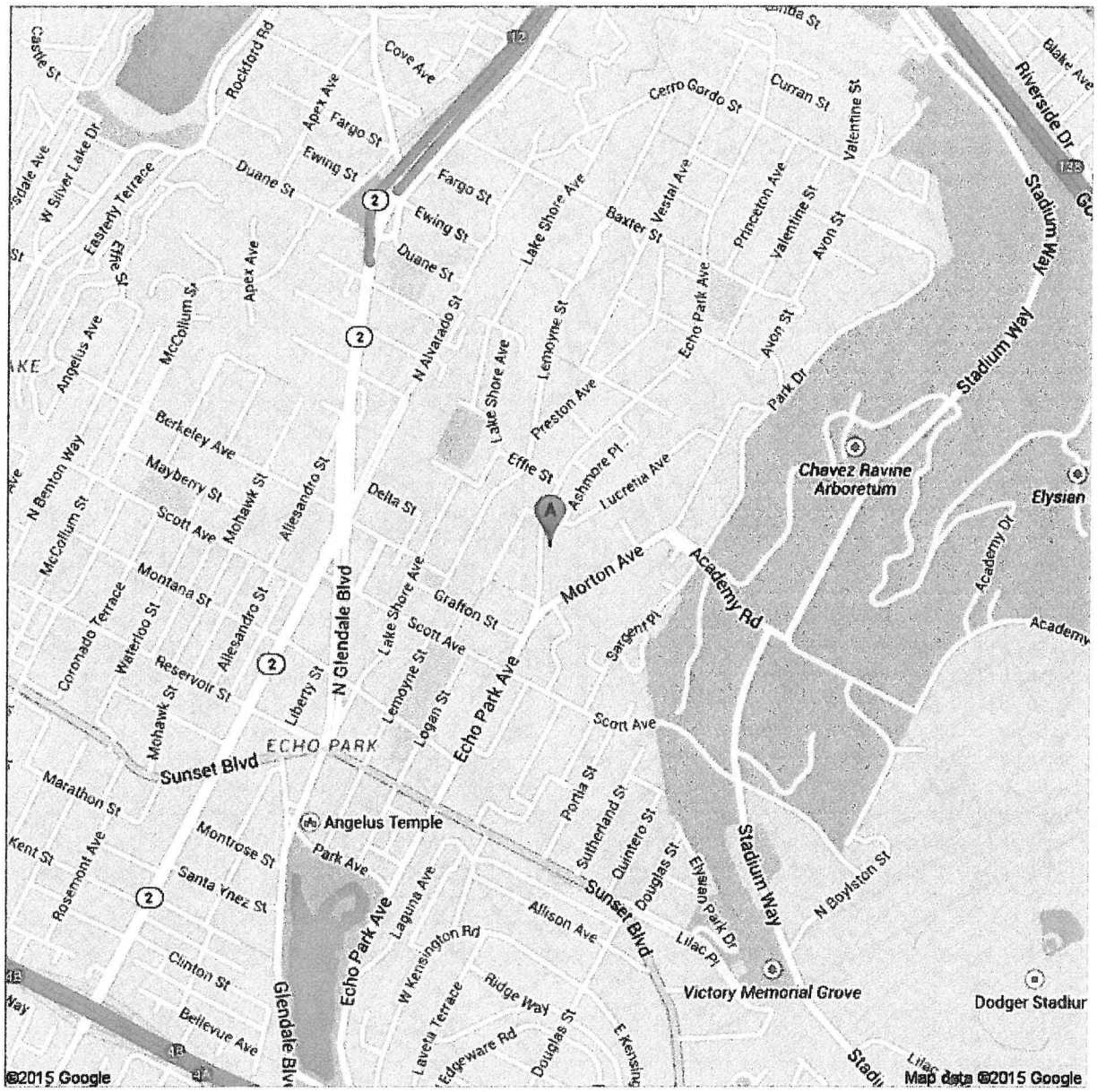
GC MAPPING SERVICE, INC.
3055 WEST VALLEY BOULEVARD
ALHAMBRA CA 91803
(626) 441-1080 FAX (626) 441-8850

0.22 NET AC.

CASE NO.
DATE: 02-16-2016
SCALE: 1" = 100'
USES FIELD
D.M. 142.5 A 209, 142.5 A 211, 141 A 209, 141 A 211
T.B. PAGE: 594 GRID: E-6

Google

Address **1650 Echo Park Ave**
Los Angeles, CA 90026



ZA 2015-0838 - CUW

HELIX Environmental Planning, Inc.
16485 Laguna Canyon Road
Suite 200
Irvine, CA 92618
949.234.8770 **tel**
619.462.0552 **fax**
www.**helixepi**.com

May 24, 2016

Ms. Marilyn Zenko
Terracon
4685 South Ash Avenue, Suite H-4
Tempe, AZ 85282

Subject: Historical Resources Technical Report for Cellco Partnership and its Controlled Affiliates Doing Business as Verizon Wireless Candidate Morton, 1650 Echo Park Avenue, Los Angeles, Los Angeles County, California.

Dear Ms. Zenko:

At the request of Terracon, HELIX Environmental Planning, Inc. (HELIX) has conducted a historical resources technical report for Cellco Partnership and its Controlled Affiliates Doing Business as Verizon Wireless (Verizon Wireless) candidate Morton, located at 1650 Echo Park Avenue, Los Angeles, CA 90026. The lease area lies in an unsectioned area of T.21S R.13W (San Bernardino Baseline and Meridian) as shown on the USGS *Hollywood, CA* 7.5 minute quadrangle map.

1.0 EXECUTIVE SUMMARY

This Historical Resources Technical Report for the multiple family residential building located at 1650 Echo Park Avenue in the Echo Park area of Los Angeles, California ("Property") was prepared at the request of Verizon Wireless. The purpose of the report is to determine the potential historical and/or architectural significance of this property which possesses limited design characteristics of the Art Deco style of architecture.

The Property was assessed in accordance with the City of Los Angeles Cultural Heritage Ordinance, City of Los Angeles Office of Historic Resources materials "What Makes A Resource Historically Significant?" (Guidelines) and the City's Historic-Cultural Monument Nomination Information Guidelines, the State of California Historic Register Guidelines, and the National Register of Historic Places criteria for the evaluation of a property for potential historical and architectural significance.

The Property was previously assessed in October 2015 to determine its potential historic and architectural significance in accordance with the National Register of Historic Places criteria as part of the Section 106 compliance process for the proposed installation of a cell tower. The Property was determined to not meet the criteria for historic and architectural significance for eligibility for nomination to the National Register of Historic Places. The building was not evaluated in October 2015 for local City of Los Angeles Historic-Cultural Monument or California Historic Resources Register significance. The report was submitted to the State Historic Preservation Office (SHPO) and SHPO concurred with the findings of non-eligibility for the National Register of Historic Places (FCC_2015_1119_006, dated December 21, 2015) (see Appendix H).

The Property is currently owned by Echo Park Apartments LLC and is occupied at the time of the preparation of the report.

The Property is defined in the Legal Description as Assessor's Parcel Number 5420-028-005, Lots 5 and 6 of Pauli Tract in the City of Los Angeles, County of Los Angeles, State of California as per Map recorded in Book 17 at page 167 of maps, in the Office of the County Recorder of Said County, and All of Lot 2 and That Portion of Lot 10 of Tract 1438, in the City of Los Angeles, County of Los Angeles, State of California as Per Map Recorded in Book 16 at Page 132 of Maps, in the Office of the County of Los Angeles Recorder. The Property consists of a multiple family residential building with a limited number of the design characteristics of the Art Deco style of architecture. Over the years, the Property was used as a multiple family residence. The changes to the Property have been documented through examination of historic records and physical site inspection.

The subject property was included in the 2014 *Survey LA* document. The survey concluded that the property was architecturally significant as an "excellent intact" example of the Art Deco style of architecture. The survey determined that the building was eligible for nomination to the local, state and national historic registers.

The *Survey LA* document is an example of standard survey documents which record a wide range of buildings, structures and objects within the survey boundary. The survey identifies the potentially historic elements in the area and makes a preliminary determination of their potential historic significance. These survey documents provide a database for further evaluation by the local planning department staff when a project is brought in for review. At that time, in-depth research into all phases of the property's history and architectural development is undertaken and a final determination of eligibility is reached.

Historical research and the current evaluation indicates that the Property is not eligible for nomination as a local City of Los Angeles Historic-Cultural Monument under any of the City of Los Angeles criteria for historic and architectural significance. When all the applicable criteria from the Cultural Heritage Ordinance materials "What Makes A Resource Historically Significant?" (Guidelines) and the City's Historic-Cultural Monument guidelines are applied to the subject property, the Echo Park apartment building is not considered to be a *special*, *outstanding*, or *inherently valuable* example of an Art Deco designed apartment building in the Echo Park community of Los Angeles.

The property is not considered to meet the criteria for nomination to the California Historic Register or the National Register of Historic Places.

2.0 INTRODUCTION

2.1 Report Organization

This Historical Resources Technical Report was prepared in order to determine the potential historical and/or architectural significance of a multiple family residential building located at 1650 Echo Park Avenue in the Echo Park area of Los Angeles, California. The residential building was built in c. 1930. Since structures that are at least 45 years of age may be considered potential historic resources under the California Environmental Quality Act (CEQA), the Property was researched and evaluated as a potential historic resource in accordance with the local City of Los Angeles criteria, the State of California Historic Register criteria and the National Register of Historic Places criteria by Kathleen A. Crawford, M.A., Architectural Historian and Historic Property Consultant for Helix Environmental, in May 2016. The

Property was determined by the present study to not be historically or architecturally significant under any of the local, state or federal criteria.

2.2 Project Area

The Property is located in the Echo Park area of the City of Los Angeles at 1650 Echo Park Avenue. The Property's Legal Description is as follows: Assessor's Parcel Number 5420-028-005, Lots 5 and 6 of Pauli Tract in the City of Los Angeles, County of Los Angeles, State of California as per Map recorded in Book 17 at page 167 of maps, in the Office of the County Recorder of Said County, and All of Lot 2 and That Portion of Lot 10 of Tract 1438, in the City of Los Angeles, County of Los Angeles, State of California as Per Map Recorded in Book 16 at Page 132 of Maps, in the Office of the County of Los Angeles Recorder.

2.3 Project Personnel

Project personnel included Kathleen Crawford, M.A., Architectural Historian and Historic Property Consultant to Helix Environmental who conducted the field survey, photographed the subject property, conducted all research for the subject property and prepared the report with its findings and conclusions. All chain of title research was conducted by California Lot Book, Inc. The Sanborn Fire Insurance Company maps were obtained from the Sanborn Company.

Ms. Crawford visited the property in May 2016 in order to evaluate the property as well as to inspect the surrounding neighborhood. Photographs were taken of the building. Subsequently, an architectural description of the building, based upon information taken during this site visit, was prepared. Based upon site inspection information, the building was compared to established architectural norms that are currently in use in the United States. Several architectural reference guides were consulted by the author to fully substantiate the architectural details of the building.

3.0 PROJECT SETTING

3.1 Physical Project Setting

The Property is located at 1650 Echo Park Avenue in the Echo Park area in the city of Los Angeles. The Property is located on a block bounded by Lucretia Street on the north and along the west side; Delta Street on the south, and Morton Avenue on the east.

3.2 Project Area and Vicinity

The 1650 Echo Park Avenue property and the immediate vicinity are residential in nature and consist largely of architect- or contractor-designed, one- and two-story single family residences mixed with multiple family buildings. The overall area of Echo Park is mixed use with a commercial core surrounded by residential buildings on the side streets. Review of historic maps, archival materials, and aerial photographs, as well as physical inspection of the surrounding area, indicates in the 1930s, shortly after this building's construction, this neighborhood was an urban, residential area.

Historicaerials.com photographs were reviewed for information related to the subject property and the surrounding area. Aerial photos from 1948, 1952, 1964, 1972, 1980, 1989, 1994, 2003, 2004, 2005, 2009, 2010, and 2012 and historic USGS quadrangle maps dating from 1898, 1902, 1906, 1910, 1913, 1921, 1932, 1953, 1963, 1968, 1975, 1982, and 1995 show the evolution of the neighborhood and subject

property. By the 1930s, this neighborhood as fully built out. Today, the neighborhood is home to many mixed use residential buildings and the residential and commercial development in the area is very dense. Many of the original residences have been replaced by new buildings. Many of the original structures in the neighborhood have been removed or extensively altered over the preceding decades. Overall, architectural styles in and around the property are eclectic in nature and reflect Craftsman, Spanish Eclectic, Modern and/or Contemporary variant designs.

3.3 Historical Overview

Echo Park History

The following information was taken from the *Survey LA: Los Angeles Historic Resources Survey* prepared by GPA Consulting, Inc. in May 2014 and the Echo Park Community Design Overlay District historic background information.

> Echo Park developed around Echo Park Lake, which traces its remnants to the earliest remnants of the Los Angeles water system. The Echo Park area is located in one of the earliest suburbs that developed around downtown Los Angeles. Echo Park Lake was a reservoir that was created in 1870 as part of the City's original water system, and Echo Park, one of the City's earliest municipal parks was established in the 1890s. The area is generally bounded by Sunset Boulevard on the north, Hollywood (U.S. 101) Freeway on the south, Bonnie Brae Street on the west, and Echo Park Avenue on the east (Echo Park Community Design District, p. 23).
>
> First established as Reservoir No. 4 by the Canal & Reservoir Company in 1870, Echo Park was essentially a basin that served to capture runoff from the 'upper flows' of the Los Angeles River. Water from the reservoir powered the City's first woolen mills. In 1872 the Canal & Reservoir Company sold the property to a group of investors, including Thomas Kelley, which began years of legal wrangling with the city over water rights. Echo Park's first phase of development occurred between 1892 and 1895 (HCM #836). (Echo Park Community Design District, p. 23).
>
> Echo Park was initially developed by real estate developer Thomas Kelley and other investors. They purchased 70 acres of land, including what is now Echo Park Lake, and named it the Montana Tract. The first lots were put up for sale in 1887. The availability of public transportation made the area easily available from downtown Los Angeles and encouraging residential development. In 1886, the Ostrich Farm Railway (later to become Sunset Boulevard) was laid out. It ran through the middle of what would become the Washington Heights Tract, created the next year. Two other tracts making up what is now Echo Park are the Echo Park Tract, platted by developers Hoge & Gaylord and Moses Wicks, subdivided in 1903, and the Lake Side Tract, also subdivided in 1903. A 1906 Sanborn map indicates a smattering of residential development along Bonnie Brae Street, Montrose, Kent, Lake Shore Boulevard, and Sunset Boulevard with most of the parcels vacant (GPA p. 7; Echo Park Community Design District, p. 23).
>
> The community of Echo Park thrived in the late 19th century due to the oil industry. In 1892, a major oil field was discovered south of what is now Temple Street in the southernmost part of the CPA. Ties to the early film industry also encouraged development. The Edendale area of Echo Park became home to a number of early film studios, which were established along Glendale Boulevard in the 1910s. Early studios included Disney (HCM #163), Talmadge (later ABC), and Mack Sennett's Keystone Studios (HCM #256) which produced the comedy 'Keystone Cops.'

The area was also frequently used for filming on location; for example, the Laurel and Hardy film, 'The Music Box' was filled in the area (GPA pp. 7-8).

Craftsman style houses began to appear in Echo Park after the turn of the century. Derived from the Arts and Crafts movement in California, architects and contractor-builders of the Craftsman style produced bungalows and mid-sized middle class homes. Typically wood frame, sheathed in clapboard or shingles, these homes made extensive use of local Arroyo stone or b rick for garden walls, foundations, chimneys, and porch supports. Low-pitch gable roofs, projecting rafters, and numerous porches defined the style. Extant Craftsman single-family homes in the project area can be found on Clinton Street and Burlington Avenue, for example, though some have been altered (Echo Park Community Design District, pp. 23-24).

Development continued in the first decades of the 20th century with the subdivision of tracts such as Sunset Boulevard Heights, northeast of what is now Sunset Boulevard and Echo Park Avenue. The area began to develop in earnest in the 1920s, a period when the city at large experienced a development boom. Due to the hillside terrain, the area is home to numerous public stairways (including one where the 'Music Box' was filmed) which were first constructed of wood and later replaced with concrete stairs. The presence of the Pacific Electric Railway along Sunset Boulevard encouraged commercial development along the street in the 1910s and 1920s. There are individual commercial buildings along Sunset Boulevard that reflect the influence of the streetcar system on Los Angeles. A small collection of buildings on Sunset Boulevard near the intersection of Innes Avenue is unique in that it combines commercial and residential uses in building forms that respond to the hilly topography. Two of these resources are bungalow courts with commercial storefronts facing Sunset Boulevard and residential units lining a central stairway (GPA pp. 8-9).

Other architectural styles which predominated in the twentieth century single-family residential subdivisions in the Echo Park CDO area included the Classical or Colonial Revival style bungalows, the Mediterranean or Spanish Colonial Revival styles homes which still stand in many neighborhoods throughout Echo Park. Set back from the street, low in scale, the Classical or Colonial Revival style homes were detailed with classical columns and pediments. The Spanish Colonial Revival houses were ornamented with tile roofs and shutters. These small structures, in either style, expressed the desire for home ownership and growth of community through residential development. Early Modern styles began to appear in Los Angeles during the 1930s and fine examples of modern styles exist in the survey area, some with significant historic associations (Echo Park Community Design District, p. 24).

Echo Park was developed as a streetcar suburb, which was designed with one eye toward neighborhood walkability and the convenient use of public transportation. Echo Park was characterized by carriage houses in the rear, which often included parking garage access through a rear alley, driveways and built-in garages were less common. Local community shops such as groceries, bakeries, and drugstores were usually built near the intersection of streetcar lines or along more heavily traveled routes, such as Sunset Boulevard. These shops would sometimes be multi-story (Jensen's Recreation Center is the prominent commercial building in the immediate area), with apartments on the upper floors. These provided convenient shopping for household supplies for the surrounding neighborhoods that could potentially be visited on the way home from one's work (Echo Park Community Design District, p. 24).

The irregular topography generally made the area unsuitable for large scale institutional development. The two notable exceptions to this rule are the Angelus Temple and Queen of Angels Hospital. Angelus Temple is located north of Echo Park and is the home of the International Church of Foursquare Gospel. The church was founded by evangelist Aimee Semple McPherson and opened in 1923. It had a capacity of 5,300. McPherson was a renowned evangelist and was famed for her theatrical sermons; the Church of the Foursquare Gospel was incredibly popular and remains in existence to this day. Angelus Temple was declared a National Historic Landmark in 1992. Queen of Angels Hospital is located north of the present-day Hollywood Freeway and was founded by the Franciscan Sisters of the Sacred Heart in 1925. The Sisters raised the money to build the hospital and it quickly grew to be the one of the largest hospitals in the region. The building was completed in 1927 and expanded in 1933 and 1937. It is now the home of a Christian ministry called The Dream Center (GPA, p. 8).

The Echo Park Recreation Center (now the Bellevue Recreation Center) was constructed in 1925 and was designed by Allied Architects; a library was built three years later (demolished in 1974). A new boathouse was constructed in 1932 to replace an earlier one. Much of the southern portion of the park was affected when the Hollywood Freeway was constructed through the area in the latter half of the 1940s; the freeway eliminated many of the amenities that once existed, including a fountain, sports field, and walking paths (GPA p. 8-9).

The Echo Park neighborhood became a haven for intellectuals and radicals beginning in the late 1920s. Numerous politicians and journalists, both mainstream and radical, lived in Echo Park because of its proximity to downtown Los Angeles. Prominent individuals who lived in the area included the author, editor and lawyer Carey McWilliams and newspaper columnist and Los Angeles City Council member Estelle Lawton Lindsey. Phillip Dike and Paul Landacre were two of many artists who lived in Echo Park. Dike was a distinguished water colorist as well as an artist at Walt Disney Studios. Landacre was one of the most important printmakers of the modern era. His fascination with printmaking developed in the late 1920s when he met the bookshop and gallery owner Jake Zenith, who lived in the neighborhood. Landacre's house was designed HCM #839 in 2006 (GPA, p. 9).

The majority of development ended by the 1930s. Modern style houses were built in the 1940s and 1950s. While the majority of the area was developed by this time, the construction of the Hollywood (U.S. 101) Freeway in 1953 marked a physical barrier to the routine of the neighborhood, separating the lake area from other residential communities. Also in 1953 two major buildings were constructed for the Church of the Foursquare Gospel (Echo Park Community Design District, p. 24).

4.0 METHODS AND RESULTS

4.1 Archival Research

Determinations of historical and architectural significance require a number of issues to be considered. Factors of significance include: the property's history, both construction and use; the history of the surrounding community; the potential for important persons or events to be associated with the property over its life span; the number of resources associated with the property; the potential for the resources to be the work of a master craftsman, architect, landscape gardener or artist; what historical, architectural or landscape influences have shaped the design of the property and its pattern of use; what alterations have taken place over the years and how have any changes affected the historical integrity of the property; and the current condition of the property. These questions and related issues must be answered before a final determination of significance can be achieved.

The archival research for this Historical Resources Technical Report included, but was not necessarily limited to, obtaining the Residential Building Record from the Los Angeles County Assessor's/Recorder's Office; Chain of Title information prepared by California Lot Book, Inc.; historical and aerial photograph research; building permit applications at the City of Los Angeles Building and Safety Department; Sanborn Fire Insurance Maps; and research in a variety of sources available at the Los Angeles Central Public Library and the Echo Park Public Library. The Echo Park Historical Society was contacted by telephone (323-860-8874, the number was disconnected and no other number was located for the organization), email and written letter (included as Attachment 1) with no response from the organization. Local, state, and federal inventories, surveys, and database material; personal research/archival material in possession of Kathleen A. Crawford, M.A.; standard and authoritative sources related to local history, architecture, and building development information were also reviewed.

Local, state, and federal inventories of historic places were reviewed for information related to the building. The criteria for historical significance were obtained from the City of Los Angeles Cultural Heritage Ordinance materials "What Makes A Resource Historically Significant?" (Guidelines) and the City's Historic-Cultural Monument Nomination Information Guide, the National Register of Historic Places Criteria and the California Environmental Quality Act (CEQA), which uses the California Register of Historical Resources Criteria.

4.2 Subject Property History

A variety of resources provided the following history of the subject property.

The **Assessor's Office Records** identify this property as Assessor's Parcel Number 5420-028-005. The building was constructed in 1930.

The **Residential Building Record** indicates that this multiple family residence was built in 1930 as a four-story apartment building, according to Permit #31623, dated December 11, 1930. The building's cost was estimated as $55,000. The residence was documented as containing 20,889 square feet of space. The building was listed as an "apartment house" with a concrete foundation and composition roof, in good condition. Electric lighting, standard plumbing, stock interior features, and fire escapes were present. The owner was listed as Rosina Pauli. A copy of this Record is included in Appendix A.

No Notice of Completion was recorded for the property.

Building Construction Permits were researched in the City of Los Angeles Building Department files for the property.

A review of building permits for the subject property indicates that a structure was built on the site prior to the 1930 construction of the apartment building. The following permits were filed for the property listed variously as 1646, 1646 ½, and 1650 Echo Park Avenue. It is possible that more than one structure was built on the three parcels that comprise the subject property. Permit #LA07813, dated November 29, 1909 was listed as "Bldg-New" and "New Construction." The use of the structure was listed as a residence. The owner was listed as Francis H. Davis or possibly Dawson (?). This individual was also listed as the architect and contractor.

Permit #LA07814 was filed on November 29, 1909 for a "Bldg." and "New Construction." These two permits list a one-story residence on the site. Additional permits were filed. Permit #LA08041 (filed December 6, 1909), permitted the construction of a one-story structure with seven rooms. Permit

#LA09860 (filed November 29, 1910) permitted "Bldg-Alter/Repair and Addition" and lists R. Pauli as the owner of the property located at 1646 Echo Park Avenue. The architect and contractor for the building were listed as "none." The structure was listed as a residence. Permit #LA08876 (filed on July 27, 1912) permitted the "Bldg-Alter/Repair and Addition" of a one-story residence located at 1646 Echo Park Avenue. The owner is listed as R. Pauli and the owner is listed as the architect and contractor.

The following permits were filed for the current building on the site.

Permit #LA31623, dated December 11, 1929, was filed to permit construction of a new, four-story, apartment building valued at $55,000. The building included 64 rooms and 28 families. The owner is listed as R. Pauli. Her address is listed as 1820 Echo Park Avenue. The architect is listed as "E. Voght." The contractor is listed as "Rosina Pauli." The building's characteristics include a concrete foundation, brick exterior, composition roof, and plaster interior walls.

A Certificate of Occupancy was filed on June 28, 1930 for a "44 (sic) stories, Class C, 64 Rooms, 28 Apartments, Apartment Building."

Permit #LA14743 was filed on October 11, 1933 for repairs to the building and masonry repairs. R. Pauli was listed as the owner.

Permit #LA47309, filed on March 10, 1972, permitted alterations and repairs to the parapet and a new roof. The repairs were valued at $5000.00. The owner was listed as Henry Holiday and the architect for the repairs was listed as Joseph A. Takahashi. No contractor was listed.

Permit #LA36859, filed on March 12, 1974, permitted "Fire Safety Standard Repairs" which were valued at $6000.00. The owner was listed as Henry Holiday and the architect for the repairs was Joseph Takahasi. The owner was listed as the contractor.

Permit #LA58458, filed on February 26, 1988, addressed "Dorothy Mae Ordinance" plumbing repairs which were valued at $15,500.

Permit #LA10294, filed on September 14, 1988, allowed alterations to the building.

Permit #LA38021, filed on July 7, 1995, authorized earthquake retrofitting for the building. As a result of the Northridge Earthquake, older masonry buildings were required to upgrade their buildings to meet the new safety standards.

A copy of these Permits is included in Appendix B.

The **Chain of Title** indicated the following owners for the property.

Anna M. Van Loan and Richard Van Loan are listed as the property owners in 1911. They sold the property to Rosina **Pauli** on October 28, 1911. Rosina Pauli held the property until August 14, 1945 when it was sold to Max Green and Bessie Green. The Greens transferred the property to Gabriel B. Kovach and Anna B. Kovach on July 29, 1949. The Kovachs owned the property until March 24, 1954 when they sold it to Richard Goodman.

Richard and Roseanne Goodman sold the property on October 21, 1955 to Dulaney W. Palmer and Betty J. Palmer. Betty J. Palmer transferred the property to Dulaney W. Palmer on April 11, 1961. Palmer retained ownership of the property until October 31, 1972.
In October 1972, the property was sold to Marilyn v. Freytag, 2/8ths interest; Florence C. Alperin, 2/8ths interest; John K. Boyle and Helen S. Boyle, 1/8th interest; Thomas D. Boyle and Margaret L. Boyle, 1/8th interest; and A. Del Lemons and Rudine B. Lemons, 2/8th interest. On the same day, the group sold the property to Henry Holliday and Viola M. Holliday. The Hollidays held the property for approximately five years, selling the apartment building to Ho Fat Seto and Kit Yung Seto on October 11, 1977. The property was then sold to Echo Park LLC on August 15, 1997. On January 12, 1998, the property was sold to Greg Wordell and Daniel Hardy. The property was sold to Echo Park, LLC on May 31, 2005. The transfer from Wordell and Hardy to Echo Park, LLC was retransferred on August 31, 2005. One September 15, 2005, Echo Park, LLC transferred the property to Echo Park Apartments, LLC. Echo Park Apartments, LLC is the current owner of the apartment complex.

A copy of the Chain of Title is included in Appendix C.

The **Los Angeles City Directories** were reviewed for the subject property from 1910-1939. No City Directories for the subject property were available after 1939. The Los Angeles City Directories list Rosina Pauli, the owner of the subject property at the time of its construction, at various addresses during these years. Rosina Pauli is listed as "H" in the listing for each year. An "H" is used to denote a "Housewife" or similar term. No other information related to the subject property was located in the Los Angeles City Directories.

Rosina Pauli

1910 – no listing
1911 – 1913 – 1646 ½ Echo Park Avenue
1914 – 1915 – 1812 Echo Park Avenue
1916 – 1917 - 1646 Echo Park Avenue
1918-1939 – 1820 Echo Park Avenue

The subject property is located on three contiguously owned parcels which have been combined into one lot. The parcels are located in the Pauli Tract and Tract No. 1438. Copies of the **Original Subdivision Maps** are included in Appendix D.

The **Sanborn Fire Insurance Company Maps** were obtained from the Sanborn Company. The years 1919, 1950, 1953, 1957, 1960, 1961, 1966, 1968, 1969, and 1970 were available for review. The 1919 map does not indicate the presence of the subject property which is consistent with the Assessor's Building Record information. The maps from 1950-1970 indicate the presence of the subject property in its current configuration. Copies of these Maps are included in Appendix E.

No street level **Historical Photographs** were located but historical aerial photographs and maps were located on Historicaerials.com. Aerial photos from 1948, 1952, 1964, 1972, 1980, 1989, 1994, 2003, 2004, 2005, 2009, 2010, and 2012 and historic USGS quadrangle maps dating from 1898, 1902, 1906, 1910, 1913, 1921, 1932, 1953, 1963, 1968, 1975, 1982, and 1995 show the evolution of the neighborhood and subject property. The subject property has remained in its current configuration since its construction.

The updated **Department of Parks and Recreation (DPR) forms** for this property are included in Appendix F.

Documentation of the **Preparer's Qualifications** is included in Appendix G.
Survey LA: Los Angeles Historic Resources Survey prepared by GPA Consulting, Inc. in May 2014 was reviewed for information related to the subject property. The subject property was included in the survey process. The subject building at 1650 Echo Park Avenue was listed as built in 1928 as an example of the Art Deco style and as follows:

Context: Architecture and Engineering, 1850-1980
Sub Context: LA Modernism, 1919-1980
Theme: Related Responses to Modernism, 1926-1970
Sub Theme: Art Deco, 1926-1939
Property type: Residential
Property sub type: No sub type
Criteria: C/3/3
Status Code: 3S; 3CS; 5S3
Reason: Excellent intact example of an Art Deco style apartment house exhibiting quality of design. One of the very few examples of the style in the area.

Additional Sources:

Dr. David Gebhard, noted California architectural historian, identified the subject building in his book, *Architecture of Los Angeles*. He made the following statement regarding the subject building: "Apartment Building, ca. 1928, 1650 Echo Park Avenue. A four-story Art Deco (Zigzag) Moderne, further enhanced by a vivid floral motif."

The real estate website, Zillow.com, was reviewed for information related to the subject building. The website showed photographs of the property and in the statements regarding the property, it commented that the building had been recently renovated. The interior photographs showed remodeled kitchens and bathrooms and newly painted interior spaces. There was no indication of when this took place and no building permits were located regarding changes to the building.

The Los Angeles Chapter of the American Institute of Architects was contacted for information related to E. Voght, the architect listed on Building Permit #LA31623, dated December 11, 1929. No information related to E. Voght was listed in their files. In addition, the Los Angeles City Directories were reviewed for information related to E. Voght and there were no listings in the City Directories for E. Voght (or any alternative spellings) in the directories from 1910-1939. Various internet sources and various directories and listings were accessed at the Los Angeles Central Public Library for information related to Mr. Voght and no information was located regarding his career or activities.

Summary of Property History

The subject property is a c. 1930 Art Deco style multiple family building located at 1650 Echo Park Avenue in the Echo Park area in the City of Los Angeles, California. The property was built as a 28-unit apartment building. The owner at the time of construction was listed as Rosina Pauli and the structure was valued at $55,000. The building permit filed for the construction of the building listed "E. Voght" as the architect; no contractor was listed. The building has been used as an apartment building since its construction to the present time. The various city and county records confirm the construction date, physical appearance, permits issued, ownership, occupancy, location and other documented facts about the building's history.

4.3 Field Survey

The field survey work was conducted by Kathleen Crawford in May 2016. An intensive survey of the subject property and surrounding neighborhood was undertaken. The Area of Potential Effect (APE) is, in this instance, the subject property.

4.4 Description of Surveyed Resources

1650 Echo Park Avenue, Los Angeles, California

The first overview photograph was taken from Zillow.com. The remaining photographs were taken by Kathleen Crawford on May 1, 2016.

Zillow: Overview, North elevation

The subject property is a four-story, 28-unit, 20,998 square foot, symmetrical in appearance, irregular shaped, multiple family building. The building contains Art Deco design details on the main elevation. The building is sited on a slightly sloping lot measuring approximately 9,049 square feet. The current lot configuration is composed of three contiguously owned parcels joined to comprise one lot. The apartment building is located in a residential neighborhood known as Echo Park which was developed in the early twentieth century in the city of Los Angeles. The neighborhood consists of a mixture of single family homes and apartment buildings.

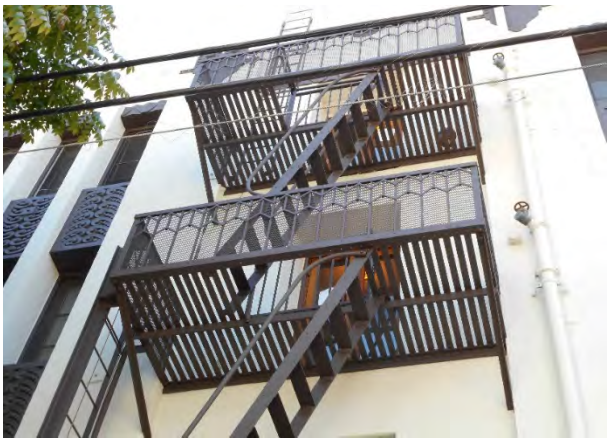
The building has a concrete foundation, stucco and brick exterior, and a flat roof with a parapet. The roof stands at 47’ 6”; the parapet section measures 49’ 6” Above Ground Level (AGL). The front elevation is clad in stucco and the remaining three elevations of the building are constructed of unpainted brick.

The main, or north, façade contains a limited number of Art Deco elements of the building. The recessed, arched main entrance is centered on the elevation. The entryway has a wood surround, wood and glass multilite doors, wood and multilite window sidelites, and a wood and glass multilite fan detail over the entrance doors. Multi-colored floor tiles accent the entrance area. The entrance is flanked by a pair of metal lights in the shape of a mythical creature. A three-flight metal fire escape rises up the front façade

directly above the entrance. The fire escapes are accessed by a single wood and glass door on each floor. The fire escape design contains geometric detailing which repeats the window detailing.

Crawford: Main Entrance

Crawford: Main Entrance Lighting Fixture



Crawford: North Elevation Fire Escape Detail

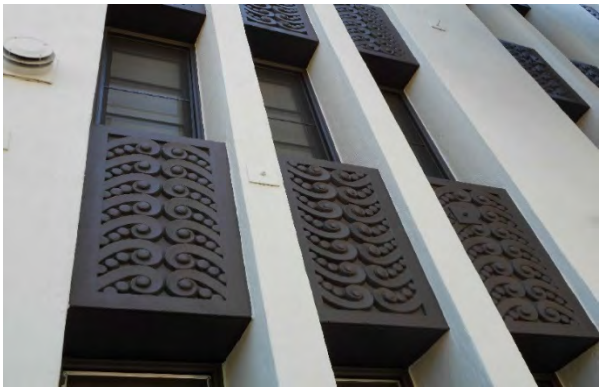
The façade includes strong vertical detailing in the form of divisions that extend the full height of the building and provide a framework for the windows.

Crawford: North and West Elevations

Crawford: North Elevation Detail

The windows are recessed, metal framed fixed pane, multilite, rectangular shaped windows set in even rows across the main elevation. The windows contain a geometric style grille in the lower portion of the window on the ground floor. Flat metal panels with a strong floral motif accent the window sections on the upper three floors.

Crawford: North Elevation Window Grille Detail



Crawford: North Elevation Floral Motif Detail

The parapet section on the main elevation contains an evenly spaced set of "shield" type applied, flat elements alternating with small circular elements. These elements are painted. The earthquake retrofitting bracing system elements are visible also.

Crawford: Parapet Details

Side and rear elevations are constructed of unpainted brick and include windows which are metal or wood framed, double hung sash and fixed pane styles. The windows are placed in even rows across the facades. Some windows have metal screens.

Crawford: View of North and East Elevations

Crawford: View of East Elevation

Crawford: View of Window Detail

Crawford: North and West Elevations

The building is in good condition with no major exterior alterations noted.

Alterations

The review of the building permits in the City of Los Angeles Building and Safety Department files for the subject property indicates that few changes have taken place over the decades. The permits that were filed for changes to the building are listed below:

Permit #LA14743 was filed on October 11, 1933 for repairs to the building and masonry repairs. R. Pauli was listed as the owner.

Permit #LA47309, filed on March 10, 1972, permitted alterations and repairs to the parapet and a new roof. The repairs were valued at $5000.00. The owner was listed as Henry Holiday and the architect for the repairs was listed as Joseph A. Takahashi. No contractor was listed.

Permit #LA36859, filed on March 12, 1974, permitted "Fire Safety Standard Repairs" which were valued at $6000.00. The owner was listed as Henry Holiday and the architect for the repairs was Joseph Takahasi. The owner was listed as the contractor.

Permit #LA58458, filed on February 26, 1988, addressed "Dorothy Mae Ordinance" plumbing repairs which were valued at $15,500.

Permit #LA10294, filed on September 14, 1988, allowed alterations to the building.

Permit #LA38021, filed on July 7, 1995, authorized earthquake retrofitting for the building. As a result of the Northridge Earthquake, older masonry buildings were required to upgrade their buildings to meet the new safety standards.

No other changes to the property were documented in the archival research phase.

5.0 SIGNIFICANCE EVALUATIONS

5.1 Integrity of the Structure

In addition to determining the significance of a property under local, state and federal criteria, it is necessary to assess whether the property has integrity. Integrity is the ability of a property to convey and maintain its significance. A property must not only be shown to be significant under the established criteria, it must also have integrity. In order to retain historic integrity, a property must possess several, and usually most, of the seven key aspects of integrity, which are location, design, setting, materials, workmanship, feeling and association.

There are two important principles for understanding Integrity:

1. Integrity is the authenticity of a historical resource's physical integrity clearly indicated by the retention of characteristics that existed during the resource's period of significance.

2. Integrity relates to the presence or absence of historic materials and character defining features.

Conclusion: The property has basically retained its exterior physical integrity.

Application of the seven aspects of integrity:

Location: Location is the place where the historic property was constructed or the place where the historic event occurred. The subject building remains at its original location at 1650 Echo Park Avenue, Los Angeles.

Design: Design is the combination of elements that create the form, plan, space, structure, and style of a property. The building retains its original design and, therefore, has retained this aspect of integrity.

Setting: Setting is the physical environment of a historic property. Review of historic maps, archival materials, and aerial photographs, as well as physical inspection of the surrounding area, indicates that this neighborhood was filled with single family and multiple family residences from the early 20th century to the present.

Aerial photographs from 1948-2012 show this neighborhood as fully built out. Today, the neighborhood is home to many one- and two-story homes and apartment complexes and the residential and commercial development in the area is very dense. The setting and the physical environment of the property have not substantially changed, therefore, it has retained this aspect of integrity.

Materials: Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The building has not undergone significant exterior alterations and has retained its original materials. The interior of the building has been renovated with new materials but the exterior has remained the same. Therefore, the integrity of the residential building has been maintained.

Workmanship: Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. The quality of the original workmanship has been maintained from the original construction. Therefore, the building has retained this aspect of integrity.

Feeling: Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. The multiple family residential property has maintained the original feeling of the property. Therefore, this aspect of integrity has been maintained.

Association: Association is the direct link between an important historic event or person and a historic property. The property has not been determined to be directly linked to an important historic event or person in local, state or national history, therefore, it has no associative element.

Conclusion: Of the seven aspects of integrity, the building retains all but one: Association. Therefore, it passes the integrity test.

5.2 Historic Context

The significance of a historic property can be judged and explained only when it is evaluated in its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property or site is understood and its meaning (and ultimately its significance) within history is made clear. In order to decide whether a property is significant within its historic context, the following things must be determined.

1. Identify the themes, geographical limits and chronological period that the property represents: The S*urvey LA* document established the historic context for the subject property. The context as stated in the *Survey LA* document is as follows:

Context: Residential Development & Suburbanizaiton, 1880-1980
Subtheme: Early Residential Development, 1880-1930
Sub-Theme: Early Multi-Family Residential Development, 1880-1930

The document states the following information regarding the historic context of the subject property. "Multi-family residential properties that substantially pre-date the surrounding development in the neighborhood in which they are located were evaluated under this Context/Theme. Such properties may be one of the first residences in the area, or a rare remaining example of the area's earliest development. A smaller number of nulti-family residences were recorded under this Context/Theme, as comparted to single family residences. They typically date from the last decade of the 19th century and the first decades of the 20th century. The majority are located in the Echo Park neighborhood of the survey area. Some properties were also recorded as excellent examples of their respective styles."

The building was constructed as a multiple family residence in 1930 in the Echo Park neighborhood of single and multiple family homes. The subject residential building is located on a sloping lot, with minimal vegetation. This is a typical lot and residential siting in this particular neighborhood. The building is part of the pattern of residential development of Echo Park in the early 1930s.

2. Determine how the theme of the context is significant in the history of the local area:

The subject property was developed as part of the overall process of residential growth and expansion in Echo Park in the late 1920s and early 1930s. The multiple family residence is a limited example of the Art Deco style of architecture used in the residential development of Echo Park during the 1930s.

3. Determine what the property type is and whether it is important in illustrating the historic context:

The property type is a multiple family residence. The residential building is a typical example of the residential properties in Echo Park in the late 1920s and early 1930s.

4. Determine what physical features the property must possess in order for it to reflect the significance of the historic context:

In order for the property to represent the pattern of residential development in Echo Park in 1930, it would have to possess unique or important attributes that relate to the development of Echo Park. The subject property, in its current condition, is a limited example of the Art Deco architectural style of the 1920s and 1930s and the overall residential development of the Echo Park neighborhood in 1930.

5.3 Application of the City of Los Angeles Cultural Heritage Ordinance and Historic-Cultural Monument Guidelines

According to the City of Los Angeles Cultural Heritage Ordinance and Historic-Cultural Monument Nomination Information Guide, the city has established the following criteria for evaluation of potential historic properties.

The City of Los Angeles Cultural Heritage Ordinance defines a Historic-Cultural Monument as a building, structure, site, or significant trees or other plant life of particular historic or cultural significance to the city of Los Angeles.

The Office of Historic Resources and the Cultural Heritage Ordinance include information related to historic properties. The Office's website includes information related to the evaluation of potential historic resources. The website asks the question "What Makes A Resource Historically Significant?" included a guidelines discussion of the question.

"Historic-Cultural Monument significance is reserved for those resources that have a *special* aesthetic, architectural, engineering interest, or value of a historic nature. The Cultural Heritage Ordinance has established criteria for designation (the criteria are listed below). When determining historic significance and evaluating a resource against the Cultural Heritage Ordinance criteria, the Cultural Heritage Commission and the staff of the Office of Historic Resources ask the following questions."

1. Is the site or structure an *outstanding* example of a past architectural style or craftsmanship?
2. Was the site or structure created by a "master" architect, builder or designer?
3. Did the architect, engineer, or owner have historical associations that either influenced architecture in the city or had a role in the development or history of Los Angeles?
4. Has the building retained integrity. Does it still convey its original design and materials?
5. 4. Is the site or structure associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities?
6. Is the site or structure associated with important movements or trends that shaped the cultural history of Los Angeles or its communities?

The City of Los Angeles Historic-Cultural Monument listings were reviewed and the subject property is not currently listed as a Historic-Cultural Monument in the City of Los Angeles.

The four criteria for Historic-Cultural Monument designation, as stated in the Cultural Heritage Ordinance, Section 22.171.7, are listed below:

1. The Property reflects the broad cultural, economic, or social history of the nation, state, or community;

No historical evidence was found that would support the determination that the Property was associated with events that made a significant contribution to the broad patterns of local or Los Angeles regional history, or the cultural heritage of California or the United States. There is no indication that the subject property reflects *special* elements or events connected with the development of Los Angeles. The structure was not associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities. The subject property does not merit designation under this criterion.

The subject property was constructed in 1930 as a multiple family property in the Echo Park area of Los Angeles. The building was an overall part of the general residential development of Echo Park but no important events were associated with the construction of the building as one of several multiple family buildings in the local community. The building does not reflect *special* elements of the community or any aspect of its growth and development.

2. The proposed monument is identified with historic personages or important events in the main currents of national, state or local history.

At the time of its construction in 1930, the subject property was owned by Rosina Pauli. The original construction permit filed with the City of Los Angeles Building Department on December 11, 1929 stated that Rosina Pauli was the owner of the property at that time. In addition, the Chain of Title information and legal description information stated that two of the three parcels that comprise the subject property were located in the "Pauli Tract." The Los Angeles City Directors indicated that Rosina Pauli lived on Echo Park Avenue from 1911-1939 at various addresses. She was listed in the City Directories as an "H," a common designation for a housewife or similar appellation. No other information was located regarding Rosina Pauli or why the tract was named for her. No information was located during the research phase that indicated Rosina Paul played any significant role in the cultural, historic, or architectural development of the city of Los Angeles or the Echo Park community.

No other information was located regarding the residents of the apartment building or any possible events connected with the property or owners and residents. Given the lack of evidence and information regarding Rosina Pauli, her activities or any potential influences she may have had on the Echo Park area, the building cannot be considered to be historically significant under this criterion. The structure is not associated with important historic events or historic personages that shaped the growth, development, or evolution of Los Angeles or its communities. The building is not connected to any important movements or trends that shaped the cultural, economic, or aesthetic development of Los Angeles or the Echo Park community. The building does not reflect *special* elements of the community or any aspect of its growth and development.

3. The proposed monument embodies the distinguishing characteristics of an architectural-type specimen inherently valuable for a study of a period, style or method of construction.

The subject property was determined to be a limited example of the Art Deco style of architecture upon review. The residential building was evaluated for potential historical and architectural significance as an example of the Art Deco style of architecture.

"Style of Construction"

Art Deco Architectural Style

The Art Deco style was developed from European roots in the 1920s. The widely acknowledged source of the style was the Exposition Internationale des Artes Decoratifs et Industrials Modernes in Paris in 1925. According to David Gebhard, noted architectural historian, "a recurring theme of the 1920s and 1930s, ... was the desire to seek out new forms or modifications of old forms to express the continually changing character and accelerated tempo of the new age. The machine and technology, especially the automobile, were seen as new nontraditional sources for architecture...It was the Art Deco and the Streamline Moderne that caught the eye and held the attention of most Americans... Untold numbers of commercial and public buildings adopted a stylish image in the decades following World War I."[1]

Gebhard describes the main attributes of the style in the following discussion. "...the Art Deco is characterized by 'Straight lines; it is angular, geometric and tends to follow cubist proportions...The lines are unvarying plain and severe, with touches of decoration in the way of color, wrought iron and glass work, for relief.' What should also be noted as primary are the importance the style placed on ornament, especially sculptural ornament, and the direct manner in which the Art Deco style was nourished by its historical roots."[2] Many of the leading examples of the style were produced by architects educated or indirectly educated within the Parisian Beaux-Arts system and the forms they produced were largely derived from classical precedent. Architects drew their design inspirations from ancient cultures, not just Greece and Rome, but Egypt, Mesopotamia, the Aztecs and Mayans of the New World, the Native American populations of North America and incorporated these ideas into a classical Beaux-Arts framework. According to Ave Pildas, in her book, *Art Deco Los Angeles*, "Art Deco was obsessed with total design, as exemplified by the bas reliefs, the sculptural fountains, exterior and interior ornamentation."[3]

Gebhard goes on to say that "what separates Art Deco from other contemporaneous modes is, above all, it's approach to ornament and surface sheathing. The general tendency was to exhibit exterior walls that expressed little depth or projection. In many Art Deco buildings, the style's characteristic emphasis on verticality was manifest in a row of piers or pilasters that subtly represented a classical portico or temple front... typical of the style was an absence of a cornice or other device to provide a vertical conclusion. The 1920s styles, especially the Art Deco, delighted in experimenting with the numerous metal alloys introduced in the course of the decade. All sorts of mixtures of steel, bronze, nickel, silver, platinum, lead, and zinc were used for elevator doors, window frames, spandrels, decorative panels, and sculpture. Lightweight aluminum also came into its own in these years, and the Art Deco architects were obviously fascinated with it, both as a material in its own right and, with plating applied, as a substitute for other materials: bronze, nickel, silver, even gold."[4]

[1] Gebhard, David, *Art Deco in America*, p. 1.

[2] Gebhard, David, *Art Deco in America*, p. 4.

[3] Pildas, Ave, *Art Deco Los Angeles*, p. 5.

[4] Gebhard, David, *Art Deco in America*, p. 5.

The color of buildings was a key element of the style and architects were influenced by the rise of the automobile. Gebhard quotes Sheldon Cheney in his discussion of color. "The automobile with its firm but soft coloring and its flashes of bright metal may again afford us a clue." Gebhard expands on this idea by stating that: "Such a scheme - 'firm but soft color' - contrasted with 'bright metal' - was certainly one of the hallmarks of the Art Deco, employed in the production of objects both large and small. The Art Deco typically contrasted warm tans and pale shades of green and blue with shiny metals or with accents of strong pure color - vehement reds, cobalt blues, or golden yellows. The style also exploited the drama of light and shadow through the adroit use of electric lighting. The Art Decos' most dramatic employment of artificial lighting was the nighttime illumination of building exteriors."[5]

"The Art Deco took two approaches to ornament: the first was to make ornament integral to the surface upon which is was placed; the second was to confine the ornament to a panel that hovered (or seemed to hover) in front of the wall surface. Favorite motifs in Art Deco ornament included spirals, sunflowers, steps, zigzags, triangles, double triangles, hexagons, fragmented circles and seashells. The patterns containing these motifs were generally rendered in low relief with sharp angular contours. Architectural details underwent a reductive process; in many Art Deco buildings vertical fluting along an exterior surface constituted the only residue of a classical column."[6]

Additional viewpoints into the origins and development of the style come from the work of Carla Breese, noted architectural historian. Ms. Breeze feels that, in addition to the Parisian origin points of the style, the style owes its development to avantgarde artists and architects of earlier decades, as well as the early cultures of the Americas. The Navajo, Hopi, Anasazi, and Plains cultures influenced the Prairie school and the Arts and Crafts movement. Flora and fauna, building designs, and the cultural traditions of blending nature and life all had an effect as architects and artists explored new design concepts. The Mesoamerican cultures, combined with the later Hispanic heritage of the Southwest, brought new ideas into the design vocabulary. Modernism inspired a whole exploration of new materials; new technological advances brought new materials into play. Metal, mosaic, concrete and terra cotta were materials that architects and artists experimented with to create their designs and adapted them to the angular, mechanized aesthetic that grew out of mass produced objects. Ms. Breeze suggests that: "new materials, new metals, new structural materials, new fabrics, compounds, alloys and aggregates... while the old materials, such as glass, wood, ceramics, marble and established metals are being presented with new finishes, new properties and new advantages." [7]

Ms. Breeze addresses the regional stylistic differences in her work and each region of the United States had influences and origins that differed somewhat from other sections of the country. In discussing the local area, she stated that "California was devoted to design accommodating automotive traffic...The style rapidly spread to the suburbs as the predominant commercial style. Reflecting the region's unique cultural and environmental heritage, imagery, such as foliation, scenes of paradise, nudes, and fruit are frequently encountered in the Art Deco style. The Pacific Ocean inspired motifs - seashells, crabs and fish, mermaids, and mythological figures associated with the sea, such as Neptune."[8]

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[5] Gebhard, David, *Art Deco in America*, p. 6.

[6] Gebhard, David, *Art Deco in America*, pp. 6-7.

[7] Breeze, Carla, *American Art Deco*, pp. 13-17.

[8] Breeze, Carla, *American Art Deco*, pp. 223-235.

Numerous examples of the style exist across the country, and while many of the buildings are large skyscraper style structures, the design concepts filtered down to small town America. They were reduced, modified, or altered to fit the regional ideals and many Art Deco buildings were created in urban America. The style tended to be more commercial in nature and better suited to the urban development of the cities of America. Some residential examples exist, but in most cities, the primary examples of the style are to be found in the commercial centers of the city.

Art Deco elements include: smooth wall surfaces, usually of stucco; zigzags, chevrons, and other stylized and geometric motifs occur as decorative elements on the facade; towers and other vertical projections above the roof line give a vertical emphasis.

The Angelino Heights Preservation Plan, prepared in June 2014, included the following local Los Angeles information regarding the Art Deco style of architecture.

"The period between the World Wars was a fertile one for the development of architectural styles that were based on an aggressively modern aesthetic, with clean lines and new styles of geometric decoration, or none at all. The Art Deco, Moderne, and Modern styles all took root and flourished in the Los Angeles Area during this period. The work of Frank Lloyd Wright could also probably be included in this category. The influence of the clean lines of these styles also gave birth to another architectural style, the Modern Minimal Traditional style, that combined the sparseness and clean lines of the Modern and Moderne styles with a thin veneer of colonial or historic revival styles. Prominent architects in the Los Angeles working in these styles included Richard Neutra, Paul R. Williams, R.M. Schindler, Stiles O. Clements, Robert Dermah, Milton Black, Lloyd Wright and Irving Gill."

"The Moderne and Art Deco styles were particularly popular in apartment buildings and commercial areas, although a few single family residences in these styles were built. Areas where surviving examples of these architectural styles can be found include the Hollywood Hills, Los Feliz, and Silverlake areas of Los Angeles."

According to the Angelino Heights Preservation Plan, the Art Deco style "enjoyed popularity in Los Angeles in the early 1920s to the early 1940s. The Art Deco style was introduced at the Paris Exposition in 1925. The term 'Art Deco' comes from the French phrase 'Arts Decoratifs.' The style reflects the modernity of science and industry from this time period and was influenced by the Bauhaus in Europe. More high style variants are sometimes referred to as 'Zig Zag Moderne,' because of the geometric patterns used as decoration in the style. Art Deco/Moderne structures are symmetrical and stylized, with recessed, vertical or horizontal rows of windows, 'wedding cake' setbacks, and sometimes stylized ornamentation of animals, water, and sunbursts. Residential structures are typically one or two stories while commercial structures are sometimes multi-storied."

The information from the Angelino Heights Plan was used to give a local Los Angeles perspective to the evaluation of the building. According to the Angelino Heights Preservation Plan, he main character-defining features of the Art Deco style are:

<u>Windows</u>:
*one over one, or single pane
*Glass block
*Rectangular or round
*Arranged in vertical or horizontal bands
*Decorative crowns or spandrel panels

Porches:
*Relatively restrained
*Cantilevered awnings

Doorways:
*Paired or single
*Large paned glazing
*Rectangular
*Decorative crowns

Rooftops:
*Flat
*Symmetrical
*Central tower with receding lower floors (wedding cake setbacks)
*Parapets (often curved)

Wall surfaces:
*Stucco
*Concrete
*Glass block
*Stainless steel
*Aluminum

Other architectural style guides include the additional following characteristics.

According to Ave Pildas, in her book, *Art Deco Los Angeles*, "Art Deco was obsessed with total design, as exemplified by the bas reliefs, the sculptural fountains, exterior and interior ornamentation."

The overall design of Art Deco buildings created an emphasis on the verticality of the design concepts.

According to Dr. David Gebhard, all sorts of mixtures of steel, bronze, nickel, silver, platinum, lead, and zinc were used for elevator doors, window frames, spandrels, decorative panels, and sculpture. Lightweight aluminum, a newer material developed during this area, was also popular.

The color of buildings was a key element of the style and architects were influenced by the rise of the automobile. Gebhard quotes Sheldon Cheney in his discussion of color. "The automobile with its firm but soft coloring and its flashes of bright metal may again afford us a clue." Gebhard expands on this idea by stating that: "Such a scheme - 'firm but soft color' - contrasted with 'bright metal' - was certainly one of the hallmarks of the Art Deco, employed in the production of objects both large and small. The Art Deco typically contrasted warm tans and pale shades of green and blue with shiny metals or with accents of strong pure color - vehement reds, cobalt blues, or golden yellows. The style also exploited the drama of light and shadow through the adroit use of electric lighting. The Art Deco's most dramatic employment of artificial lighting was the nighttime illumination of building exteriors."

The Art Deco took two approaches to ornament: the first was to make ornament integral to the surface upon which is was placed; the second was to confine the ornament to a panel that hovered (or seemed to hover) in front of the wall surface. Favorite motifs in Art Deco ornament included spirals, sunflowers, steps, zigzags, triangles, double triangles, hexagons, fragmented circles and seashells. The patterns containing these motifs were generally rendered in low relief with sharp angular contours. Architectural

details underwent a reductive process; in many Art Deco buildings vertical fluting along an exterior surface constituted the only residue of a classical column."

Analysis of Subject Building Design Characteristics:

The Echo Park apartment building's design includes a limited number of the main character defining features of the Art Deco style.

1. The building displays the Art Deco characteristics on the front elevation only. The other three elevations contain no Art Deco design concepts. Therefore, three-quarters of the building contains no elements related to Art Deco design. Art Deco style focused heavily on the overall, total design of the building and created an integrated, cohesive design that extended to all four sides of the structure. This is not the case with this building.

2. The building's main entrance is centered on the front elevation. The arched entrance is more evocative of the Spanish Eclectic or Spanish Revival styles than Art Deco. A review of Art Deco style buildings in Los Angeles, California and across the United States indicates that arched detailing is very limited and, when used, it tends to be a minor detail. The emphasis is primarily on the verticality of the design concepts and arched elements are minimal at best.

3. The front façade is clad in stucco which has been painted white. The smooth stucco wall surface is a characteristic of the Art Deco style, but the other three elevations are composed of red brick which is not a main characteristic of Art Deco style buildings. Again, the key design concepts are not integrated throughout the entire structure but are limited in nature.

4. The white color of the exterior of the main elevation does not reflect the color concepts used in better examples of Art Deco design. Pale colors contrasting with bright color elements that accent the geometric details are used extensively in Art Deco style buildings. The use of bright colors is designed to highlight the elaborate details of the design and make them more accessible to the viewer. The "shield" details at the top of the building on the front façade are painted a dull color and do not reflect the vibrant color concepts used on better examples of the style. No information was located to indicate what the original color scheme of the building was or how it may have changed over the decades.

5. Lighting of the building's exterior is also used extensively to highlight the key Art Deco design concepts. Currently, the building has no such lighting patterns and no information was located to indicate that the building's exterior ever included such details. The two exterior "gargoyle" lights that flank the front entrance provide only minimal lighting at the entrance area and are not indicative that a more elaborate lighting scheme was ever used on the building.

6. The use of a variety of metals made popular by the new technology of the twentieth century was a key element of Art Deco design. The building's design contains metal window detailing and metal grilles on the ground floor windows of the main elevation. This is a limited use of metal and, again, does not exemplify this key aspect of Art Deco design. The use of metal frames on the windows is a standard detail on the majority of buildings and, in this case, it was not used to exemplify the modern technology of the times. The grilles on the ground floor windows reflect the geometric concepts of the era but are not a good use of the new metal technology. In addition, the windows on the other remaining three sides of the

building are standard, stock windows and have none of the characteristics of Art Deco window design.

7. Vertical elements are a major concept inherent to the overall design of Art Deco style buildings. The building's main façade contains strong vertical detailing combined with the window placement. These elements constitute the key design concepts of the front elevation and are part of the design palette used in Art Deco design. Unfortunately, this key element, and one of the strongest elements of the building's design, was not extended to the other elevations of the building. This has created a limited, truncated overall design which does not reflect the Art Deco key concept of total design.

8. The floral design metal spandrels that are part of the vertical design and the window placement are good examples of Art Deco design concepts. The spandrel element is limited to the front façade only and does not repeat on the other three elevations.

9. The front elevation contains a "shield" design (for lack of a better term) alternating with circular elements at the upper portion of the main elevation. These elements are flat on the surface of the wall and do reflect the use of this type of Art Deco detail. They are limited in nature and do not reflect the exuberant use of zigzags, spirals, seashells, triangles, hexagons, chevrons, floral, sunbursts, and other such stylistic elements seen on better examples of the style. The bas relief elements are present on the front façade only, once again reflecting the limited nature of the Art Deco design concepts.

10. The building contains a metal fire escape system on the front façade. The architect attempted to integrate the Art Deco concepts into the fire escape railings by the use of a limited geometric pattern. The placement of the fire escapes in the center of the main elevation interrupts the Art Deco styling and vertical design of the front façade. It creates an intrusive break in the overall design of the front façade. This type of detail is not seen on good examples of Art Deco design.

11. Good example of Art Deco design create a fusion of interior and exterior elements, continuing the Art Deco design elements into the interior spaces. The interior of the building does not contain any significant Art Deco design elements and does not reflect an integrated, cohesive design that exemplifies the main character defining features of the Art Deco style.

Summary of Subject Building Analysis:

In conclusion, when the criteria created by the Cultural Heritage Ordinance and the Historic-Cultural Monument guidelines are applied to the subject property, the building fails to exemplify the key character defining features of the Art Deco style. The building's design incorporates a limited number of the main elements of popular Art Deco concepts but the architect used them in such a restrained, undeveloped way that the design never rises to the level of good design. In addition, the use of the Art Deco elements on the front elevation only reduces the building's design to a suggestion of the Art Deco style but not an *outstanding* example of the style. Excellent, outstanding examples of the Art Deco style are present in Los Angeles which could have served as examples for the architect and provided a positive influence on his design. The architect did not create an integrated, cohesive design which is a primary element of good Art Deco design. The architect failed to develop the design concepts he did use in a way that reflected the vitality and vibrancy of good Art Deco design.

"Type of construction" means the form and materials clearly demonstrate, through the presence of essential physical features, a specific purpose and/or function.

The subject property is a multiple family residential building and does not represent a specific purpose and/or function any more than any other apartment building. The building is not a particular "type" of building which warrants architectural merit. The building contains the typical floor plan and arrangement of interior spaces that are found in the vast majority of apartment buildings.

"Method of construction" means it is a rare or an important example of building practices, construction innovations, or technological advances during a specific time in history.

The construction type is a standard example of multiple family residential construction. Nothing in the visual observation or construction records indicates that the apartment building *is* a rare or important example of building practices, construction innovations, or technological advances during a specific time in history.

"Period of construction" means the age and physical features reflect the era when the specific recognized architectural style, building type, or method of construction became popular.

The subject apartment building was constructed in 1930, during the period when the Modernistic styles of architecture were gaining popularity. The Art Deco style was used extensively in the Los Angeles area during the 1920s-1930s and many fine examples were built during this era. The subject building is a limited example of the Art Deco style.

In conclusion, when all the applicable criteria from the Cultural Heritage Ordinance and the Historic-Cultural Monument guidelines are applied to the subject property, the Echo Park apartment building is not considered to be a *special*, *outstanding*, or *inherently valuable* example of Art Deco design in the Echo Park community of Los Angeles. The building is not considered to be potentially eligible for nomination as a Historic-Cultural Monument under Criterion 3.

4. The proposed monument is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

The architect for the building was identified as E. Voght on the original building permit filed on December 11, 1929. No information was located regarding the architect, his career, or his body of work. There is no indication that E. Voght was connected to any significant architectural trends, movements or major developments. There is no indication that his design of the subject building, or any other building, influenced the major architectural trends of Los Angeles or Echo Park in the 1930s or any other period. The building cannot be considered to be a *notable* work of a master architect. Therefore, the subject building is not representative of the work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist or craftsman.

Summary

The subject property located at 1650 Echo Park Avenue is not considered to meet the criteria for nomination as a City of Los Angeles Historic-Cultural Monument under any of the above listed criteria.

5.4 Application of California Register of Historical Resources Criteria

Properties that are subject to the California Environmental Quality Act (CEQA), must be evaluated for historical significance under the California Register of Historical Resources. The criteria for evaluating the significance of historical resources require that the resource must be significant at the local, state or national level under one or more of the following four criteria.

(1) Association with Events: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

No historical evidence was found that would support the determination that the Property was associated with events that made a significant contribution to the broad patterns of local or regional history, to the cultural heritage of California or the United States. The subject property does not merit designation under California Register Criterion (1).

(2) Association with Persons: It is associated with the lives of persons important to local, California or National History.

No historical evidence was found that would support the determination that the Property was associated with the lives of persons important to local, California or national History. None of the persons that were determined to be associated with the building are considered to have influenced the development of Los Angeles, California or the nation. Rosina Pauli, the owner of the property for several decades, was not connected to important events or developments. No evidence was located during the research phase to indicate that she played any significant role in the development of Echo Park, Los Angeles, or the state or nation. The subject property does not merit designation under California Register Criterion (2).

(3) Design/Construction: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values.

The Property does not embody the distinctive or distinguishing characteristics of a significant type, period, region or method of construction. The subject building was designed with a limited number of the key elements of the Art Deco style of architecture. Only one elevation of the building displays Art Deco design characteristics; the other three facades contain no Art Deco design elements. The property's design characteristics and the Art Deco style were discussed above under the application of the City of Los Angeles Cultural Heritage Ordinance and Historic-Cultural Monument criteria.

The building's overall design does not rise to the level necessary to render it eligible for significance at the state level. The Art Deco elements are present only on the main elevation which comprises approximately one-quarter of the building's elevations. The other three facades are plain brick elevations with no Art Deco stylistic characteristics. These facades have no decorative elements and are devoid of any architectural significance. In addition, the building's main entrance, a dominant feature of the north elevation, is more reminiscent of Spanish Eclectic or Revival architecture than a true delineation of the Art Deco signature geometric concepts. The building's design lacks overall cohesion and integration of the Art Deco design concepts on all four facades. Three quarters of the building's overall design contains no Art Deco elements and, therefore, the building cannot be considered to display the main character defining features of the Art Deco style. Other better and more significant examples exist in California and in the City of Los Angeles. The subject property does not merit designation under California Register Criterion (3).

(4) Archaeology: It has yielded or has the potential to yield information important to the prehistory or history of the local area, California or the nation.

To be designated under this criterion the property must have information to contribute to our understanding of human history and prehistory and that information must be important. The subject property does not merit designation under California Register Criterion (4).

Summary

The subject property located at 1650 Echo Park Avenue is not considered to meet any of the established criteria for potential nomination to the California Register of Historic Resources.

5.5 Application of National Register of Historical Places Criteria

As part of the Section 106 process for cell tower projects, the subject property was evaluated in October 2015 for historic and architectural significance and its potential eligibility for nomination to the National Register of Historic Places. The California State Office of Historic Preservation (SHPO) (FCC>2015_1119_006, dated December 21, 2015) concurred with the October 2015 determination that the subject property was not considered historically and architecturally significant under any of the established criteria.

The subject property was re-evaluated for the National Register of Historic Places as part of the May 2016 evaluation process.

Criterion A: Event: Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

No historical evidence was found that would support the determination that the Property was associated with events that made a significant contribution to the broad patterns of our history. The subject property does not merit designation under National Register Criterion A: Event.

Criterion B: Person: *Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.*

No historical evidence was found that would support the determination that the Property was associated with persons significant in our past. Rosina Pauli, the owner of the property for several decades, was not connected to important events or developments. No evidence was located during the research phase to indicate that she played any significant role in the development of Echo Park, Los Angeles, or the state or nation. The subject property does not merit designation under National Register Criterion B: Person.

Criterion C: Design/Construction: Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

The subject property was designed with a limited number of the design characteristics of the Art Deco style of architecture in 1930 in the Echo Park community of Los Angeles. The property's design characteristics and the Art Deco style were discussed above under the application of the City of Los Angeles Cultural Heritage Ordinance and Historic-Cultural Monument criteria.

The Property does not embody the distinctive or distinguishing characteristics of a significant type, period, region or method of construction. Only some portions of the building contain Art Deco design elements and the building's overall design and limited use of Art Deco design elements on only one of the building's elevations does not raise its design to the level necessary to render it eligible for significance at the national level. The Art Deco elements are present only on the main elevation which comprises approximately one-quarter of the building's elevations. The other three facades are plain brick elevations with no Art Deco stylistic characteristics. These facades have no decorative elements and are devoid of any architectural significance. In addition, the building's main entrance, a dominant feature of the north elevation, is more reminiscent of Spanish Eclectic or Revival architecture than a true delineation of the Art Deco signature geometric concepts. The building's design lacks overall cohesion and integration of the Art Deco design concepts on all four facades. Three quarters of the building's overall design contains no Art Deco elements and, therefore, building cannot be considered to display the main character defining features of the Art Deco style. Other better and more significant examples exist in the nation. The subject property does not merit designation under National Register Criterion C: Architecture.

Criterion D: Information Potential: Properties may be eligible for the National Register if they have yielded or are likely to yield information important in prehistory or history.

This criterion is intended to address archaeological resources. To be designated under this criterion the property must have information to contribute to our understanding of human history and prehistory and that information must be important. This criterion is not applicable to this property. The subject property does not merit designation under National Register Criterion D: Information Potential.

Summary

The subject property located at 1650 Echo Park Avenue is not considered to meet any of the criteria for nomination to the National Register of Historic Places under any of the established criteria. In addition, it has already been determined by SHPO in October 2015 to not be eligible for nomination to the National Register of Historic Places as part of the Section 106 process.

5.6 Findings and Conclusions

This Historical Resources Technical Report for the residential building located at 1650 Echo Park Avenue in the Echo Park area of Los Angeles, California has determined the overall historical and architectural significance of the property. The research and evaluation process indicates that the Property is not historically and architecturally significant under any of the established City of Los Angeles, State of California or United States criteria for determining historical and architectural significance. The subject building is not considered to be eligible for nomination as a City of Los Angeles Historic-Cultural Monument, the State of California Historic Register or the National Register of Historic Places.

The subject property was not associated with any important events or individuals at the local, state or national levels; it does not embody the distinctive characteristics of a style, type, period, or method of Art Deco construction to the level necessary for it to qualify at the local, state and national levels, and it is not a valuable example of the use of indigenous materials or craftsmanship. The building does not represent the notable work of a "master." It is not listed in or eligible for listing in the Historic-Cultural Monument register of the City of Los Angeles, or California or National Registers.

We at HELIX appreciate the opportunity to assist you on this project. If we can be of any further assistance, or if you have any questions concerning this letter, please do not hesitate to contact Al Martinez at (949) 234-8770 or via his e-mail, ALM@ helixepi.com.

Sincerely,

Kathleen Crawford, M.A.
Architectural Historian
HELIX Environmental Planning, Inc.
16485 Laguna Canyon Road, Suite 200
Irvine, CA 92618

6.0 BIBLIOGRAPHY

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ATTACHMENT 1

ECHO PARK HISTORICAL SOCIETY LETTER

April 12, 2016

Echo Park Historical Society
P.O. Box 26102
Echo Park, CA 90026

Dear Echo Park Historical Society,

I am an architectural historian researching the property located at 16450 Echo Park Avenue. I would like to obtain information related to ownership, use, changes to the Echo Park area over the years and any other pertinent related information. Do you have an archives that I can visit or is there some other method to obtain whatever information you might have on this property in your files? I would appreciate any information you could give me related to this property. Thank you very much for your assistance. I can be reached at 619-889—9415 or kcrawford4@cox.net or P.O. Box 634, La Mesa, CA 91944. I would be happy to pay any costs associated with the project. Looking forward to hearing from you.

Sincerely,

Kathleen Crawford
P.O. Box 634
La Mesa CA 91944
619-889-9415

APPENDIX H

STATE HISTORIC PRESERVATION OFFICER (SHPO) LETTER

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

December 21, 2015

Reply In Reference To: FCC_2015_1119_006

Carrie Wills
HELIX
16485 Laguna Canyon Rd., Suite 200
Irvine, CA 92618

RE: Morton, 1650 Echo Park Ave., Los Angeles, Los Angeles County, Collocation

Dear Ms. Wills:

Thank you for initiating consultation with me on behalf of the Federal Communications Commission (FCC) regarding your efforts to comply with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f), as amended, and its implementing regulation found at 36 CFR Part 800. You do so under the terms of the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, September 2004* (PA). You are requesting I concur that the above-referenced undertaking will not affect historic properties.

The FCC's licensee or the tower company named as the applicant proposes to construct and operate an unmanned cellular communications facility at the above-referenced address. In addition to your project description, you have submitted maps, photographs, the results of a records search conducted at the regional information center, evidence of Native American consultation, and evidence of public notification.

On behalf of the FCC, the applicant's consultant has prepared DPR523 forms for the subject property and is seeking my concurrence with the eligibility determination. The applicant consultant's has evaluated the subject property built 1928 and found the subject property ineligible under National Register Criteria A and C.

I concur that the subject property at 1650 Echo Park Ave., Los Angeles, Los Angeles County is not eligible for the National Register under Criterion A because it appears not to be associated with a significant historic trend or event and under Criterion C because the property is not a good example of Beaux Arts style architecture with diminished integrity due to various exterior alterations.

Having reviewed the documentation provided, I concur that the undertaking as described will not affect historic properties.

Be advised that under certain circumstances, such as an unanticipated discovery or a change in project description, you may have additional future responsibilities for this undertaking under 36 CFR Part 800. Should you encounter cultural artifacts during ground disturbing activities please halt all work until a qualified archaeologist can be consulted on the nature and significance of such artifacts.

I look forward to continuing our consultation. If you have any questions, please contact Michelle C. Messinger, State Historian II of my staff at (916)445-7005 or at Michelle.Messinger@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

CORRESPONDENCE

Re: Case No: ZA-2015-0838-CUW-1A

To Whom it May Concern:

I have been notified that there is a proposal to erect a wireless service facility within 500 feet of my residence in Los Angeles, California in an extremely high density neighborhood which is currently subject to even greater residential construction and development. According to the letter I recently received from the East Los Angeles Planning Commission, the Zoning Administration has denied the permit. I applaud this action by the commission and am writing to demonstrate further concern and opposition to the project.

With regard to any arguments on behalf of the project that a health concern is insignificant, I refuse to acknowledge such a poorly advised and contestable position. In addition to the uncertain health risk of radiofrequency electromagnetic fields, the visual presence of 12 panel antenna (camouflaged or not) in an architecturally congested urban environment is completely contrary to the notion of "Urban Greening". For the purpose of accelerating transmission and increasing electronic device utility, with consequent financial gain for Verizon, I feel a decline in our property values will inevitably result. Real or perceived health risks have appreciable effects on market values. Mature residents are less impressed by enhanced wireless service, than with environmental and market effects.

Although Section 704 of Title 7 of the Federal Telecommunications Act of 1996 maintains that compliance with the FCC's regulations protects such facilities from state or local government opposition based on environmental risks to health, the criteria by which the FCC safe emission standards are set has not, to my knowledge, been made with sufficient evidence collected from long term, broad based studies. Individual sensitivities to various exposure levels over long periods are difficult, if not impossible, to measure without risking medical liability in the process. And yet, even at this relatively early stage in the history of human exposure to radiation from cell phones, there is enough uncertainty to consider them dangerous to certain populations. Brain cancer may be a side effect, especially in young children.

The movement toward "Greening" our urban landscapes does not ignore what is invisible. The climate of city includes the effects of all sorts of electronic devices which impact our personal magnetic fields on a conscious or unconscious level. There is no doubt that television, computers, microwave ovens, and every other electronic appliance affects the nervous system. In the inner city there is virtually no relief from this impact. And the noticeable difference becomes startlingly evident once one has left city limits. Nature sweeps our senses of electronic residue. Returning to the electronic congestion of the inner city involves re-adaptation to an invisible, yet palpable stress.

I do not want to be the involuntary recipient of more invisible, yet palpable radiation in my residential neighborhood. I thoroughly oppose granting a permit to install a new proposed wireless facility. Please consider the humanistic value of listening to the protest of senior citizens. Our voices are trying to claim what we value, and to sustain ourselves. We are older than the generation that depends furiously on I phones, ipods, etc. to run their lives.

We belong to an earlier ethic, and deserve some respect before our vision abdicates tenure on the planet. We are rapidly losing ground, air, water and now even the invisible ether to commercial interest. Thank you for listening to our voice rather than that of big business.
Sincerely,

Regina LeBorg,

ECHO PARK IMPROVEMENT ASSOCIATION
PO Box 26896 Los Angeles, CA 90026
(323) 882-4835 EpiaMail@yahoo.com

September 3, 2015

Azeen Khanmalek, Project Planner
City of Los Angeles Department of City Planning
Office of Zoning Administration
200 N. Spring St, Rm. 763
Los Angeles, CA 90012
(213) 978-1336
azeen.khanmalek@lacity.org

Case#: ZA 2015-838-CUW, 1650 Echo Park Ave, Los Angeles, CA 90026 - Cell Tower

Mr. Khanmalek:

The Echo Park Improvement Association (EPIA) respectfully submits the following recommendations regarding the proposed cell antennae installation at 1650 Echo Park Avenue: That Option 2, as presented to us, be approved as presented.

In general, the EPIA does not support roof-top cell antennae installations when they exceed the height restriction of the prevailing zoning.

However, Option 2 as presented to us was with-in 1-2 feet of the height of the elevator shaft. As such, the height difference was determined to be insignificant. Furthermore, it was determined that the esthetic treatment (screen) matched well with the existing building.

Thank you for your consideration:

Andrew Garsten, EPIA President
Chair: Neighborhood Issues Committee
Cc: Council Member Mitch O'Farrell

ECHO PARK IMPROVEMENT ASSOCIATION
PO Box 26896 Los Angeles, CA 90026
(323) 882-4835 EpiaMail@yahoo.com

April 6, 2016

East Los Angeles Planning Commission
200 N. Spring St, Rm. 532
Los Angeles, CA 90012
(213) 978-1336
APCEastLA@lacity.org

Case#: ZA 2015-838-CUW-1A, 1650 Echo Park Ave, Los Angeles, CA 90026 - Cell Tower

Commissioners:

The Echo Park Improvement Association (EPIA) respectfully submits the following recommendations regarding the proposed cell antennae installation at 1650 Echo Park Avenue: That the appeal is denied.

In July 2015 a representative from Verizon - Ms. Stella Shih, presented the project to EPIA. In this presentation, the existing height of the building was not presented. After we submitted our letter dated September 3, 2015, we found out that the building was already exceeding the height of the prevailing zoning.

As we discussed in the September 2015 letter, "in general, the EPIA **does not** support roof-top cell antennae installations when they exceed the height restriction of the prevailing zoning."

Subsequently, we have on multiple occasions over the last several months asked Ms. Shih to come back so we can address this issue. She has failed to do so.

We urge the East Los Angeles Planning Commission to uphold the height restrictions, denying this appeal.

Thank you for your consideration:

Andrew Garsten, EPIA President
Chair: Neighborhood Issues Committee
Cc: Council Member Mitch O'Farrell