

From: [Zdeba, Benjamin](#)
To: [Ramirez, Brittany](#)
Subject: FW: Verizon Wireless Application, 2545 Eastbluff Drive (PA2017-256), Commission Hearing September 13, 2018
Date: Monday, September 10, 2018 3:56:42 PM
Attachments: [Verizon Wireless Letter 09.10.18.pdf](#)
[image001.png](#)

FYI for Item No. 3.

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From: Paul Albritton <pa@mallp.com>
Sent: Monday, September 10, 2018 3:54 PM
To: Zak, Peter <pzak@newportbeachca.gov>; Weigand, Erik <eweigand@newportbeachca.gov>; Dunlap, Bill <bdunlap@newportbeachca.gov>; Kramer, Kory <kkramer@newportbeachca.gov>; Koetting, Peter <pkoetting@newportbeachca.gov>; Kleiman, Lauren <lkleiman@newportbeachca.gov>; Lowrey, Lee <llowrey@newportbeachca.gov>
Cc: Campbell, Jim <JCampbell@newportbeachca.gov>; Harp, Aaron <aharp@newportbeachca.gov>; Zdeba, Benjamin <bzdeba@newportbeachca.gov>; Jurjis, Seimone <sjurjis@newportbeachca.gov>; Torres, Michael <mtorres@newportbeachca.gov>
Subject: Verizon Wireless Application, 2545 Eastbluff Drive (PA2017-256), Commission Hearing September 13, 2018

Dear Commissioners, attached please find our letter prepared on behalf of Verizon Wireless in support of its application for a stealth wireless facility behind Eastbluff Village Center. We urge you to follow staff's recommendation and approve the application to provide needed improvements to Verizon Wireless's network in the Eastbluff area of Newport Beach. Thank you.

Paul

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September 10, 2018

VIA EMAIL

Chair Peter Zak
Vice Chair Erik Weigand
Secretary Bill Dunlap
Commissioners Kory Kramer, Peter Koetting,
Lauren Kleiman and Lee Lowrey
Planning Commission
City of Newport Beach
100 Civic Center Drive
Newport Beach, California 92660

Re: Verizon Wireless Application UP2017-035 (PA2017-256)
Stealth Wireless Facility, 2545 Eastbluff Drive
Planning Commission Agenda, September 13, 2018

Dear Chair Zak, Vice Chair Weigand, Secretary Dunlap and Commissioners:

We write on behalf of Verizon Wireless to urge you to follow the recommendation of Planning Division staff and approve its application for a stealth wireless facility located behind a shopping center (the "Proposed Facility"). Designed as a slimline pole with antennas fully concealed, the Proposed Facility complies with all wireless facility standards of the Newport Beach Municipal Code (the "Code"). It also meets all findings for approval of a conditional use permit and special findings for wireless facilities. The Proposed Facility will provide reliable new in-building service for Newport Beach residents and visitors to the Eastbluff neighborhood as well as emergency response personnel. We strongly urge you to approve the Proposed Facility.

The Project

Verizon Wireless has worked diligently to identify a location and design for the Proposed Facility that minimize any impact on the surrounding neighborhood. The Proposed Facility will be placed behind a building at the rear of the Eastbluff Village Center, distant from the streets alongside the shopping center. Verizon Wireless proposes to conceal its panel antennas in a three-foot wide, 47-foot tall slimline pole. Panel antennas will be stacked in two sets of three to minimize pole diameter. The pole will be painted a neutral off-white color to complement surrounding buildings, and much of the

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pole will be concealed behind buildings as seen from the front side of the shopping center and nearby streets. For efficient use of space, Verizon Wireless will place its equipment on a platform in a rebuilt trash enclosure next to the slimline pole. Elevated well above the working area of the trash enclosure, the 232 square foot platform that will support Verizon Wireless's radio cabinets and a standby generator to provide continued service in case of emergency. The trash enclosure area, including Verizon Wireless's equipment, will be surrounded by a 16 foot 8 inch façade with a stucco finish matching existing buildings. A photosimulation attached as Exhibit A shows the minimal visual impact of the Proposed Facility slimline pole behind the shopping center.

The Proposed Facility Complies with All Code Standards.

As confirmed in the staff report, the Proposed Facility meets all Code criteria for stealth design of a new wireless facility. Much of the slimline pole will be out-of-view as seen from typical public vantage points, at a location where existing buildings provide screening. Code §§ 20.49.050(A)(2), 20.49.050(A)(4), 20.49.050(E)(3). With antennas stacked vertically to reduce the slimline pole diameter to only three feet, the facility is of minimal size and profile in comparison to adjacent buildings. Code § 20.49.050(A)(3). The equipment enclosure completely hides equipment and screens it from surrounding uses. Code §§ 20.49.050(E)(1), 20.49.050(F)(6)(a)(iii). The stucco finish of the equipment enclosure area is fully compatible with the existing architectural elements of the shopping center buildings. Code §§ 20.49.050(A)(1), 20.49.050(F)(6)(a)(iv). The Proposed Facility also meets particular screening standards for Class 4 (freestanding) installations. Notably, there are no visible antenna arrays, and the slimline pole is in the least obtrusive location possible, a little-used area behind the shopping center. Code § 20.49.050(F)(4)(a). At 47 feet tall, the Proposed Facility slimline pole falls under the applicable structure height limit of 50 feet in the non-residential, non-shoreline height limit area. Code § 20.30.060(C)(2)(d). In sum, the Proposed Facility satisfies all of the Code's standards for a new freestanding wireless facility.

The Proposed Facility Meets all Findings for Approval of a Conditional Use Permit.

Because it provides a great public benefit with minimal impact, the Proposed Facility meets all findings for approval of a conditional use permit, as confirmed in the staff report. Code § 20.52.020(F). One finding requires that design, location, shape, size and operating characteristics are compatible with nearby uses and physically suitable for the site. The Proposed Facility achieves these aims through its stealth design that hides all wireless equipment, its location behind buildings away from busy pedestrian areas, and its minimal size (a slimline pole only three feet in diameter). Further, the Proposed Facility will operate with little noise and requires only occasional maintenance visits, generating minimal traffic impact. It has been located to represent orderly and harmonious growth, and it does not endanger, jeopardize or constitute a hazard to public convenience, health, interest, safety or general welfare. In fact, the Proposed Facility

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provides an important public benefit through improved service for Newport Beach residents, visitors to the commercial area and emergency service personnel. The Proposed Facility is consistent with the General Plan as it is accessory to the retail and service uses permitted in the neighborhood commercial land use category. In sum, the Proposed Facility meets all findings for approval of a conditional use permit.

The Proposed Facility Meets all Special Findings for Wireless Facilities.

Under the Code, wireless facilities require special findings for approval in addition to use permit findings. Code § 20.49.060(H)(1). For example, a facility must be visually compatible with the surrounding neighborhood. The Proposed Facility meets this finding because of the minimal profile of the slimline pole, with only the top portion visible from typical public vantage points, and full screening of the equipment area with a stucco finish.

One special wireless finding is that alternative sites further from residential districts, public parks or public facilities cannot fill coverage needs. The Proposed Facility is located in an isolated commercial district surrounded by residential districts plus a park and school to the west. The owner of the adjacent tennis club property to the north did not respond to Verizon Wireless's contact efforts, and this location was discounted due to lack of landlord interest. The Proposed Facility is as far from less-preferred locations as feasible without placing it in the shopping center parking lot where it would pose substantial visual, pedestrian and parking impacts. A summary of alternative candidates reviewed is attached as Exhibit B. The Proposed Facility is ideally located to serve the coverage objective while avoiding discouraged locations, and it satisfies this finding.

Another special wireless finding requires that there is no available, feasible or more desirable alternative plan that would involve a higher-preference facility class (i.e., Classes 1, 2 or 3). Classes 1 and 2 (stealth and visible building-mounted antennas) are infeasible. This is because buildings in the Eastbluff Village Center are either unavailable due to lack of landlord interest or already support a wireless facility integrated into the roof, leaving insufficient space for an additional wireless facility. Class 3 facilities (right-of-way) are less desirable because the only vertical infrastructure in nearby rights-of-way is street light poles of limited height that can support only a small antenna. Generally, street light poles must be replaced with a more robust pole to support a wireless facility. Lower height reduces the coverage footprint of antennas. Numerous right-of-way facilities would be required to achieve the service coverage of the Proposed Facility, constituting a more intrusive deployment overall. As the higher-preference wireless facility classes are infeasible or less desirable, the Proposed Facility satisfies this finding.

To summarize, the Proposed Facility meets all special findings for approval of a wireless facility, as confirmed in the staff report.

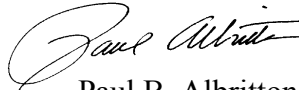
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Conclusion

Verizon Wireless has worked diligently to identify a location and design for a facility to provide reliable new service to the Eastbluff neighborhood in Newport Beach. The Proposed Facility complies with all Code standards for wireless facilities, as antennas are fully concealed in a slimline pole only three feet in diameter and mostly out-of-view behind commercial buildings. The Proposed Facility also meets all findings for approval of a conditional use permit as well as special findings for wireless facilities. Improved Verizon Wireless service is important for residents and visitors as well as emergency service personnel in Newport Beach. We urge you to follow staff's recommendation and approve the Proposed Facility.

Very truly yours,



Paul B. Albritton

cc: Aaron Harp, Esq.
Michael Torres, Esq.
Seimone Jurjis
Benjamin Zdeba
Bill Dunlap

Schedule of Exhibits

Exhibit A: Photosimulation
Exhibit B: Alternatives Map

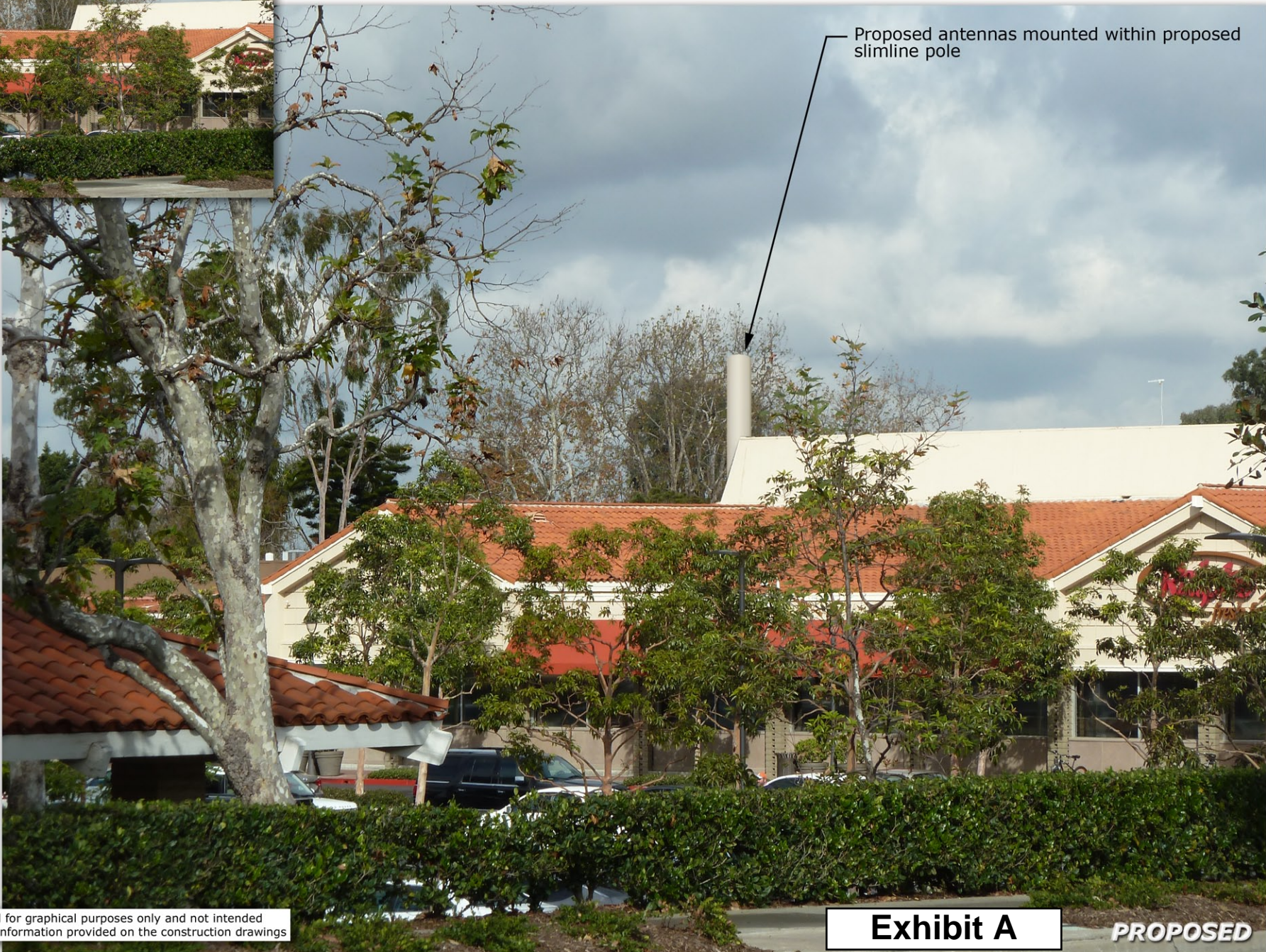
EXISTING



Eastbluff Commission - September 13, 2018
254 NE 3rd Avenue, Materials Received
Verizon Eastbluff, Newport, Oregon (503-256-017-256)
Newport Beach, CA 92660

verizon✓

Proposed antennas mounted within proposed
slimline pole



These simulations are intended for graphical purposes only and not intended
to be part of or to replace the information provided on the construction drawings

Exhibit A

PROPOSED

8/10/2018

Photosimulation of proposed telecommunications site: View from South

Verizon Wireless
Eastbluff Facility, Newport Beach
Alternative Candidates

Candidate 1 – East Bluff Park – City of Newport Beach Park

City responded to initial inquiry asking for more information, but did not respond further once it found out Verizon Wireless wanted to build a site in the park.

Candidate 2 – Eastbluff Elementary School

The School District did not respond to contact effort.

Candidate 3 – Newport Beach Tennis Club

The owners did not respond to contact efforts.

Candidate 4 – 2503 Eastbluff Drive

Already occupied by another carrier (T-Mobile). Insufficient space for another carrier.

Candidate 5 – Ralph's

Even though this is a TIC-owned building, the Kroger Corporation still controls the rooftop space and does not allow wireless facilities.

