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Los Angeles City Council
City Hall
200 North Spring Street
Los Angeles, CA 90012

September 7, 2012

Re: **Council File No. 09-2645/Proposed Amendments to “Above Ground Facilities” Ordinance, LAMC Sec. 63.03.01 (“AGF Ordinance”) – City Council Agenda 9/11/12**

Beachwood Canyon Neighborhood
Bel Air Knolls Property Owners
Bel Air Skycrest Property Owners
Bel Air Ridge Association
Benedict Canyon Association
Brentwood Hills Homeowners
Brentwood Residents Coalition
Cahuenga Pass Property Owners
Canyon Back Alliance
Crests Neighborhood Assn.
Franklin Ave./Hollywood Bl. West
Franklin Hills Residents Assn.
Highlands Owners Assn.
Hollywood Dell Civic Assn.
Hollywood Heights Assn.
Hollywoodland Homeowners
Holmby Hills Homeowners Assn.
Kagel Canyon Civic Assn.
Lake Hollywood HOA
Laurel Canyon Assn.
Lookout Mountain Alliance
Los Feliz Improvement Assn.
Mt. Olympus Property Owners
Mt. Washington Homeowners All.
Nichols Canyon Assn.
N. Beverly Dr./Franklin Canyon
Oak Forest Canyon Assn.
Oaks Homeowners Assn.
Outpost Estates Homeowners
Pacific Palisades Residents Assn.
Residents of Beverly Glen
Roscomare Valley Assn.
Shadow Hills Property Owners
Sherman Oaks HO Assn.
Studio City Residents Assn.
Sunset Hills Homeowners Assn.
Tarzana Property Owners Assn.
Torreyson Flynn Assn.
Upper Mandeville Canyon
Whitley Heights Civic Assn.

Honorable Councilmembers:

The Federation of Hillside and Canyon Associations, Inc., representing forty resident and homeowner associations spanning the Santa Monica Mountains, strongly supports the reports of the PLUM and Public Works Committees (Reports), which recommend that the Above Ground Facilities Ordinance (AGF) be amended in the following respects:

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

The Hillside Federation urges the Council to adopt the Reports without delay. We further request that the Council direct the following additional, reasonable amendments:

- Expansion of the right of appeal to “all aggrieved persons.”
- Provision for a special purpose hearing prior to permit issuance, for all proposed installations in residential and other sensitive zones or areas, for the purpose of determining whether there is a significant coverage gap and lack of feasible alternatives.
- Requirement for the applicant to bear the expense of an independent expert to assist the City, as needed, with technical analyses.
- Requirement for the applicant to provide an RF emissions analysis and/or certification of compliance with FCC requirements.
- Requirement for the applicant to map all existing wireless facilities and to project anticipated future needs.

The Hillside Federation also urges the Council to enact an Interim Control Ordinance (temporary moratorium) for a fixed time period on Public Right Of Way (PROW) installations while the AGF Ordinance amendments are being drafted.

Thank you for your consideration.

Sincerely,

Marian Dodge

Marian Dodge

cc: Ted Jordan, Assistant City Attorney
June Lagmay, City Clerk

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