



Planning Director Staff Report Hearing on May 11, 2023

County of Ventura • Resource Management Agency

800 S. Victoria Avenue, Ventura, CA 93009 • (805) 654-2478 • www.vcrma.org/divisions/planning

CROWN CASTLE: “HALL MOUNTAIN” MODIFICATION OF CONDITIONAL USE PERMIT (CUP) LU11-0008, CASE NO. PL22-0149

A. PROJECT INFORMATION

1. **Request:** The applicant requests approval of a Minor Modification of Conditional Use Permit (CUP) LU11-0008 to authorize the continued use, operation, and maintenance of an existing Wireless Communication Facility (WCF) for a 10-year period (Case No. PL22-0149).
2. **Applicant:** Crown Castle, 200 Spectrum, Suite 1700, Irvine, CA 92618.
3. **Property Owner:** Ventura Land Trust, PO Box 1284, Ventura, CA 93002.
4. **Applicant’s Representative:** Lynda McClung, Synergy a Division of Advantage Engineers, LLC, 7543 Woodley Avenue, Suite 201, Van Nuys, CA 91406.
5. **Decision-Making Authority:** Pursuant to the Ventura County Non-Coastal Zoning Ordinance (NCZO) (Section 8105-4), the Planning Director is the decision-maker for the requested CUP modification.
6. **Project Site Size, Location, and Parcel Number:** The 546.87-acre project site is located at 1 Crimea Fire Road, near the intersection of Hall Radio Tower Road and Crimea Fire Road, near the city of San Buenaventura, in the unincorporated area of Ventura County. The Tax Assessor’s parcel number for the parcel that constitute the project site is APN 064-0-150-155 (Exhibit 2).
7. **Project Site Land Use and Zoning Designations (Exhibit 2):**
 - a. Countywide General Plan Land Use Map Designation: Open Space
 - b. Zoning Designations: OS-160ac (Open Space, 160-acre minimum)
8. **Adjacent Zoning and Land Uses/Development (Exhibit 2):**

| Location in Relation to the Project Site | Zoning | Land Uses/Development |
|--|--|------------------------|
| North | AE-40ac (Agricultural Exclusive, 10-acre minimum) | Undeveloped open space |
| East | AE-40ac / OS-160ac (Open Space, 160-acre minimum) | Undeveloped open space |

| Location in Relation to the Project Site | Zoning | Land Uses/Development |
|--|---|----------------------------------|
| South | City of San Buenaventura | Urban Development and open space |
| West | RA-10ac (Rural Agricultural 10-acres minimum) / OS-160ac / City of San Buenaventura | Urban Development and open space |

9. History: On March 21, 1974, CUP 3426 was approved for the replacement of two towers with the current 80-foot-tall lattice tower. The permit was approved for a 5-year period to an expiration date of March 21, 1979, with the ability to continue the use for subsequent five-year periods.

On October 18, 2001, Permit Adjustment (PAJ) to CUP 3426 was approved for transferring the permit, completing landscaping, and the installation of three (3) antennas to the existing tower. Subsequently, the permit was never use inaugurated.

On November 6, 2012, a new CUP LU11-0008 was approved for the continued use of the existing unmanned wireless tower for 10 years to expire November 6, 2022.

10. Project Description: The applicant requests a modified CUP be granted to authorize the continued use, operation, and maintenance of an existing WCF exclusively for public safety. The facility consists of an 80-foot-tall lattice tower, a 160-square-foot equipment shelter, a propane generator, and a 499-gallon propane tank. The WCF is used exclusively for public safety communications by Southern California Edison (SCE). There are six (6) antennas mounted at following heights on the tower:

- One (1) whip antenna located 78 feet above grade level;
- Three (3) whip antennas located 58 feet above grade level;
- One (1) whip antenna located 36 feet above grade level; and
- One (1) microwave dish antenna located 8 feet above grade level.

The whip antenna located at 78 feet above grade extends 10 feet one-inch above the top of the 80-foot tower to a maximum height of 90 feet one-inch above finished grade. The WCF and associated equipment is located within a 1,100-square-foot lease area that is enclosed by a 6-foot-tall chain-link fence equipped with barbwire. The WCF is unmanned, except for occasional periodic maintenance visits, and would continue to operate 24 hours per day. The unmanned facility does not require water to operate. Access to the site is available via Crimea Fire Road connected School Canyon Road. No exterior lighting, grading, or fencing was proposed with the project (Exhibit 3).

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE

Pursuant to CEQA (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (Title 14, California Code of Regulations, Division 6, Chapter 3, Section 15000 et seq.), the proposed project is subject to environmental review.

The State Legislature through the Secretary for Resources has found that certain classes of projects are exempt from CEQA environmental impact review because they do not have a significant effect on the environment. These projects are declared to be categorically exempt from the requirement for the preparation of environmental impact documents. The proposed project would include the continued use, operation, and maintenance of an existing WCF with no modification to the existing tower, ground equipment, or surrounding area. Therefore, the proposed project qualifies for Class 1 Categorical Exemption pursuant to Section 15301 (Existing Facilities) of the CEQA Guidelines. Further, the project will not trigger any of the exceptions to the exemptions listed under CEQA Guidelines Section 15300.2, and therefore, no further environmental review is required.

C. CONSISTENCY WITH THE GENERAL PLAN

The proposed project has been analyzed to and determined to be consistent with all applicable General Plan policies. A consistency analysis which evaluates the project's consistency with the policies of the General Plan is included as Exhibit 4 of this Staff Report.

D. ZONING ORDINANCE COMPLIANCE

The proposed project is subject to the requirements of the Ventura County NCZO.

Pursuant to the requirements of the Ventura County NCZO (Section 8105-4), the proposed use is allowed in the OS-160ac zone district with the granting of a CUP. Upon the granting a Minor Modification for continued use of the existing CUP, the proposed project will continue to comply with the requirements of the Ventura County NCZO.

The existing facility is comprised of an 80-foot-tall lattice tower with six whip antennas, and is exclusively used by SCE for their communications. In 2011, SCE provided a letter (Exhibit 6) to the Planning Division for LU11-0008 describing the use of the facility to provide dispatch services and communications essential for the safety of SCE field crews. The letter identifies and explains the infrastructure and design of the tower and antennas and the surrounding geography which makes the height of the facility essential to provide the necessary radio coverage for public safety, and the need for separation of the whip antennas from interference from other antennas. This would limit the ability to collocate the SCE antennas on another facility, or for other operators to collocate on the subject 80-foot lattice tower. Given the constraints of a collocation and the public safety nature of the SCE equipment on the subject 80-foot-tall lattice tower, the facility has been determined to be used exclusively for public safety. Therefore, per NCZO Section 8107-

45.2.4, the Planning Director, as the applicable County decision-making authority, can modify the development standard relating to the height of a non-stealth WCF, as identified by Section 8107-45.4(f)(5)(b) to allow for the non-stealth tower to be greater than 50 feet in height. The whip antenna mounted at 78 feet near the top of the tower extends 10 feet one-inch above the top of the 80-foot tower giving the facility a total height of 90 feet one-inch from finished grade to the top of the antenna.

The existing WCF is subject to the special use standards of the Ventura County NCZO (Section 8107-45.4), including the modified height requirement of Section 8107-45.4(f)(5)(b). Table 1 lists the applicable special use standard and a description of whether the proposed project complies with the special use standards.

Table 1 – Special Use Standards Consistency Analysis

| Special Use Standard | Complies? |
|--|--|
| <p>Section 8107-45.4 (a) Partial and Full-Concealment Requirements:</p> <p>To minimize visual impacts, a wireless communication facility shall be designed as a stealth facility or building concealed facility. A wireless communication facility may be designed as a non-stealth facility only if it meets standards provided in Sec. 8107-45.4(b) below.</p> | <p>Yes, the facility is non-stealth and meets the standards of Section 8107-45.4(b).</p> |
| <p>Section 8107-45.4 (b) Exceptions to Stealth and Building-Concealed Facilities:</p> <p>A non-stealth facility may be permitted when the applicant demonstrates that the project location and design meet one or more of the following criteria:</p> <ul style="list-style-type: none"> (1) The facility is not prominently visible from a public viewpoint and could not be prominently visible from a public viewpoint following a Section 6409(a) Modification. This standard may be achieved by blending the facility into its surroundings as defined in Sec. 8107-45.4(c); or (2) The non-stealth facility is prominently visible from a public viewpoint but meets one or more of the following criteria: <ul style="list-style-type: none"> a. It is located on a ridgeline and meets the requirements in Sec. 8107-45.4(l); or b. The minimum height required for adequate service, coverage, or capacity area cannot be achieved with one or more stealth facilities (see Sec. 8107-45.4(f)(4)); or c. It is used solely for the provision of public safety and the decision-making authority waives this development standard pursuant to Sec. 8107-45.2.4. | <p>Yes, the non-stealth lattice tower is set back on the hilltop and is not prominently visible from a public viewpoint. Additionally, the facility is set back behind another WCF and is painted gray to blend into its surroundings.</p> |

Table 1 – Special Use Standards Consistency Analysis

| Special Use Standard | Complies? |
|---|---|
| <p>Section 8107-45.4 (c), Making Wireless Communication Facilities Compatible with the Existing Setting:</p> <p>To the extent feasible, all wireless communication facilities shall be located and designed to be compatible with the existing setting as follows:</p> <ul style="list-style-type: none"> (1) Location: Facilities shall be located in areas where existing topography, vegetation, buildings, or structures effectively screen and/or camouflage the proposed facility; and (2) Facility Design: The facility shall be designed (i.e. size, shape, color, and materials) to blend in with the existing topography, vegetation, buildings, and structures on the project site as well as its existing setting. | <p>Yes, the non-stealth lattice tower is set back on the hilltop and is not prominently visible from a public viewpoint and is painted gray to blend with its surroundings.</p> |
| <p>Section 8107-45.4 (d) Preferred Wireless Communication Facility Locations:</p> | <p>N/A, the facility is existing, however the location meets Section 8107-45.4(d)(3) which states “Where the wireless communication facility is not prominently visible from a public viewpoint,” as the facility is set back from the hilltop and is not prominently visible from a public viewpoint.</p> |
| <p>Section 8107-45.4 (e) Non-Preferred Wireless Communication Facility Locations:</p> | <p>N/A, the facility is existing, however the location meets subsection 8107-45.4(d)(3) for preferred locations as the facility is set back from the hilltop and is not prominently visible from a public viewpoint.</p> |
| <p>Section 8107-45.4 (f)(5), Height, Non-Stealth Facilities:</p> <p>(a) Notwithstanding subparts (b) and (c) below, in no event shall a non-stealth facility exceed the maximum height stated in the applicable Area Plan.</p> <p>(b) Unless a greater height limit is approved in accordance with subsection (c) below, non-stealth facilities shall not exceed 50 feet in height.</p> <p>(c) When the Planning Commission (or the Board of Supervisors, upon appeal) is the assigned decision-making authority for a proposed wireless communication facility entitlement pursuant to Sec. 8105-4 or Sec. 8105- 5, a non-stealth facility may be approved if one or more of the following findings are made:</p> <ul style="list-style-type: none"> i. The greater height results in the same or reduced visual and environmental impacts when compared to the standard applicable height limits: or ii. The applicant demonstrates that the minimum height required for | <p>Yes, As described above, the facility is used exclusively for public safety. Therefore, per NCZO Section 8107-45.2.4, the Planning Director, as the applicable County decision-making authority, is modifying the development standard relating to the height of a non-stealth WCF to allow for an 80-foot-tall non-stealth lattice tower with a whip antenna mounted at 78 feet that extends 10 feet one-inch above the top of the tower, for a total height of 90 feet one-inch feet from grade.</p> |

Table 1 – Special Use Standards Consistency Analysis

| Special Use Standard | Complies? |
|--|--|
| <p>adequate service, coverage, or capacity area cannot be achieved with one or more shorter facilities; or</p> <p>iii. The greater height is necessary for the provision of public safety (see Sec. 8107-45.2.4).</p> | |
| <p>Section 8107-45.4 (g) Setbacks:</p> <p>1. All wireless communication facilities shall comply with the required minimum front, side, and rear yard setbacks for the zone in which the site is located. No portion of an antenna array shall extend beyond the property lines.</p> <p>Ground-mounted wireless communication facilities shall be set back a distance equal to the total facility height or 50 feet, whichever is greater, from any offsite dwelling unit.</p> <p>Whenever feasible, a new ground-mounted wireless communication facility shall be set back from the property line to avoid creating the need for fuel clearance on adjacent properties.</p> | <p>Yes, the WCF is existing and no portion of the of an antenna array extends beyond the property lines. The proposed WCF meets all setbacks from the property lines.</p> |
| <p>Section 8107-45.4 (h) Retention of Concealment Elements:</p> | <p>N/A, the existing facility is non-stealth.</p> |
| <p>Section 8107-45.4 (i) Standards for Specific Types of Stealth Facilities:</p> | <p>N/A, the existing facility is non-stealth.</p> |
| <p>Section 8107-45.4 (j) Historical Landmarks/Sites of Merit:</p> <p>A wireless communication facility shall not be constructed, placed, or installed on a structure, site or district designated by a federal, state, or County agency as an historical landmark or site of merit unless that facility is designed to meet the Secretary of the Interior (SOI) Standards. If the facility does not meet the SOI standards, then the Cultural Heritage Board must determine that the proposed facility will have no significant, adverse effect on the historical resource.</p> | <p>Yes, the existing WCF is not constructed or installed on a structure, site or district designated by a federal, state, or County agency as an historical landmark or site of merit.</p> |
| <p>Section 8107-45.4 (k), Environmentally Sensitive Areas:</p> <p>All wireless communication facilities and their accessory equipment shall be sited and designed to avoid or minimize impacts to habitat for special status species, sensitive plant communities, migratory birds, waters and wetlands, riparian habitat, and other environmentally sensitive areas as determined by the County's Initial Study Assessment Guidelines.</p> | <p>Yes, the WCF is existing and would not be located within an environmentally sensitive area. The WCF is located on an existing legally disturbed area. There are no proposed modifications to the existing facility.</p> |
| <p>Section 8107-45.4 (l) Ridgelines:</p> <p>A wireless communication facility shall not be sited on a ridgeline or hilltop that is prominently visible from a public viewpoint when alternative sites are available. Applicants shall demonstrate that no feasible, alternative locations are available</p> | <p>Yes, the WCF is on a hilltop, but is not prominently visible from a public viewpoint.</p> |

Table 1 – Special Use Standards Consistency Analysis

| Special Use Standard | Complies? |
|---|--|
| <p>when proposing a wireless communication facility on a ridgeline or shall demonstrate that alternative locations result in significant environmental impacts when compared to the proposed ridgeline location.</p> | |
| <p>Section 8107-45.4 (m) Scenic Resource Protection Overlay Zone:</p> | <p>N/A, the facility is not located in a Scenic Resources Protection Overlay Zone.</p> |
| <p>Section 8107-45.4 (n), Accessory Equipment: All accessory equipment associated with the operation of a wireless communication facility shall be located and screened to prevent the facility from being prominently visible from a public viewpoint to the maximum extent feasible.</p> | <p>Yes, all accessory equipment associated with the existing WCF are placed at ground-level and are screened to prevent the facility from being prominently visible from public viewing areas to the maximum extent feasible.</p> |
| <p>Section 8107-45.4 (o), Colors and Materials: All wireless communication facilities shall use materials and colors that blend in with the natural or man-made surroundings. Highly reflective materials are prohibited.</p> | <p>Yes, all colors and materials used for the WCF blend in with the natural surroundings. There are no reflective materials.</p> |
| <p>Section 8107-45.4 (p), Noise: All wireless communication facilities shall be operated and maintained to comply at all times with the noise standards outlined in Section 2.16 of the Ventura County General Plan Goals, Policies, and Programs.</p> | <p>Yes, the operation of the WCF does not generate noise. The WCF is always operated and maintained to comply with the Ventura County noise standards.</p> |
| <p>Section 8107-45.4 (q), Landscaping and Screening: The permittee shall plant, irrigate and maintain additional landscaping during the life of the permit when landscaping is deemed necessary to screen the wireless communication facility from being prominently visible from a public viewpoint. New landscaping shall not incorporate any invasive species or watch species, as defined by the California Invasive Plant Council (Cal-IPC) and shall be in conformance with Section 8106-8.2.5. (AM. ORD. 4577 – 3/9/21)</p> | <p>Yes, landscaping is not deemed necessary for a facility that is not prominently visible from a public viewpoint and is existing in open space.</p> |
| <p>Section 8107-45.4 (r), Security:</p> <ol style="list-style-type: none"> 1. Each facility shall be designed to prevent unauthorized access, climbing, vandalism, graffiti and other conditions that would result in hazardous situations or visual blight. The approving authority may require the provision of warning signs, fencing, anti-climbing devices, or other techniques to prevent unauthorized access and vandalism. 2. All fences shall be constructed of materials and colors that blend in with the existing setting. The use of a chain link fence is prohibited within areas designated as Urban and Existing Community in the General Plan, and areas that are prominently visible from a public viewpoint, unless the chain link fence is fully screened. | <p>Yes, there is an existing 6-foot-tall chain-link fence equipped with barbwire around the lease area. All materials and colors blend in with the existing setting. The proposed project is not designated as Urban and Existing Community in the General Plan.</p> |

Table 1 – Special Use Standards Consistency Analysis

| Special Use Standard | Complies? |
|---|--|
| <p>Section 8107-45.4 (s), Lighting:</p> <ol style="list-style-type: none"> 1. No facility may be illuminated unless specifically required by the FAA or other government agency. 2. Any necessary security lighting shall be down-shielded and controlled to minimize glare or light levels directed at adjacent properties and to minimize impacts to wildlife. | <p>Yes, the existing WCF is not illuminated.</p> |
| <p>Section 8107-45.4 (t), Signage:</p> <p>A permanent, weather-proof identification sign, subject to Planning Director approval, shall be displayed in a prominent location such as on the gate or fence surrounding the wireless communication facility or directly on the facility. The sign must identify the facility operator(s) and type of use, provide the operator’s address, FCC-adopted standards, and specify a 24-hour telephone number at which the operator can be reached during an emergency.</p> | <p>Yes, the site includes signage indicating all necessary information related to the equipment for the operation of the facility.</p> |
| <p>Section 8107-45.4 (u), Access Roads:</p> <ol style="list-style-type: none"> 1. Where feasible, wireless communication facility sites shall be accessed by existing public or private access roads and easements. 2. Wireless communication facility sites shall minimize the construction of new access roads, particularly when such roads are located in areas with steep slopes, agricultural resources, or biological resources as determined by the County’s Initial Study Assessment Guidelines. When required, new access roads shall be designed to meet standards established by the Ventura County Public Works Agency and Ventura County Fire Protection District. | <p>Yes, site is accessed by Crimea Fire Road which is a privately owned access road. No new roads are proposed.</p> |

E. CUP FINDINGS AND SUPPORTING EVIDENCE

The Planning Director must make certain findings in order to grant a CUP modification pursuant to Section 8111-1.2.1.1 of the Ventura County NCZO. The ability to make the required findings is evaluated below.

- 1. The proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code [Section 8111-1.2.1.1.a].**

Based on the information and analysis presented in Exhibit 4 and Section D of this staff report, the finding that the proposed development is consistent with the intent and provisions of the County's General Plan and of Division 8, Chapters 1 and 2, of the Ventura County Ordinance Code can be made.

2. The proposed development is compatible with the character of surrounding, legally established development [Section 8111-1.2.1.1.b].

As discussed above, the proposed project would authorize the continued operation of an existing WCF that is located set back from the top of a hilltop. The existing 80-foot-tall lattice tower is located approximately 8,000 feet east of Highway 33 (an Eligible State Scenic Highway) and 6,000 feet north of Foothill Boulevard (an Eligible State Scenic Highway). Due to the surrounding topography, the tower is not prominently visible from public viewpoints. There are no operational or physical changes proposed as part of the project. Thus, there would be no new visual impacts and the existing development would remain compatible with the character of the surrounding development.

Based on the discussion above, this finding can be made.

3. The proposed development would not be obnoxious or harmful, or impair the utility of neighboring property or uses [Section 8111-1.2.1.1.c].

The continued operation of the existing WCF would not create any substantial new effects on neighboring properties. The WCF does not generate substantial noise or pose a health threat. The facility is entirely contained within a fenced area. No adverse effects on neighboring properties or uses have been identified. Additionally, the project is conditioned to establish a system for the reporting and resolution of complaints (Exhibit 5, Condition Nos. 14 and 19).

Based on the discussion above, this finding can be made.

4. The proposed development would not be detrimental to the public interest, health, safety, convenience, or welfare [Section 8111-1.2.1.1.d].

As indicated in Section B of this staff report, no significant environmental impacts have been identified that would result from the proposed project. The project would be subject to conditions of approval (Exhibit 5, Condition Nos. 2 and 6) that will ensure that the existing uses would be compatible with the neighboring residential uses. Due to the design and distance of the WCF from public viewing areas, the proposed project would not create any new impacts to visual resources.

Based on the discussion above, this finding can be made.

5. The proposed development, if allowed by a Conditional Use Permit, is compatible with existing and potential land uses in the general area where the development is to be located [Section 8111-1.2.1.1.e].

The existing facility blends in with the surrounding environment. No changes are proposed; therefore, the character of the site would not change. The proposed project does not affect any surrounding land uses, and the project is not sensitive

to impacts from these uses. No new effects on the surrounding uses would occur with this modification for additional 10 years of use.

Based on the discussion above, this finding can be made.

6. The proposed development will occur on a legal lot [Section 8111-1.2.1.f].

The subject APN (064-0-150-155) and adjacent APN (064-0-150-165) combined comprise a legal lot described in Parcel B of Exhibit A of Parcel Map Waiver No. 814 recorded February 12, 1998, Document No. 98-019858 of Official Records of said County. The Parcel Map Waiver was reviewed, approved and recorded in compliance with the Subdivision Map Act and Ventura County Subdivision Ordinance.

Based on the discussion above, this finding can be made.

7. The proposed development is approved in accordance with the California Environmental Quality Act and all other applicable laws.

As discussed in Section B above, the CUP modification involves the continued use of an existing WCF on the subject property. The project qualifies for a Class 1 Categorical Exemption pursuant to Section 15301 (Existing Facilities) of the CEQA Guidelines.

Based on the discussion above, this finding can be made.

F. PLANNING DIRECTOR HEARING NOTICE, PUBLIC COMMENTS, AND JURISDICTIONAL COMMENTS

The Planning Division provided public notice regarding the Planning Director hearing in accordance with the Government Code (Section 65091), Ventura County NCZO (Section 8111-3.1). On May 1, 2023, the Planning Division mailed notice to owners of property within 300 feet of the property on which the project site is located. On May 1, 2023, the Planning Division placed a legal ad in the Ventura County Star.

The project site is located within the City of San Buenaventura's Area of Interest. Therefore, on November 21, 2022, the Planning Division notified the city of the proposed project and requested any comments that the city might have on the proposed project. The city provided email correspondence on November 28, 2022, that the city had no comment on the proposed project.

G. RECOMMENDED ACTIONS

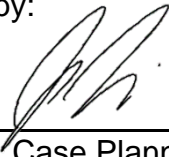
Based upon the analysis and information provided above, Planning Division Staff recommends that the Planning Director take the following actions:

1. **CERTIFY** that the Planning Director has reviewed and considered this staff report and all exhibits thereto, and has considered all comments received during the public comment process;
2. **FIND** that this project is categorically exempt from CEQA pursuant to Section 15301 (Existing Facilities) of the CEQA Guidelines.
3. **FIND** that the WCF is used exclusively for public safety for SCE, and therefore meets the criteria of Section 8107-45.2.4 to waive the development standards of NCZO Section 8107-45.4(f)(5), for height of non-stealth WCFs (Exhibit 6);
4. **MAKE** the required findings to grant a Minor Modification of a CUP LU11-0008 pursuant to Section 8111-1.2.1.1 of the Ventura County NCZO, based on the substantial evidence presented in Section E of this staff report and the entire record;
4. **GRANT** Minor Modification of CUP LU11-0008 (Case No. PL22-0149), subject to the conditions of approval (Exhibit 5).
5. **SPECIFY** that the Clerk of the Planning Division is the custodian, and 800 S. Victoria Avenue, Ventura, CA 93009 is the location, of the documents and materials that constitute the record of proceedings upon which this decision is based.

The decision of the Planning Director is final unless appealed to the Planning Commission within 10 calendar days after the permit has been approved, conditionally approved, or denied (or on the following workday if the 10th day falls on a weekend or holiday). Any aggrieved person may file an appeal of the decision with the Planning Division. The Planning Division shall then set a hearing date before the Planning Commission to review the matter at the earliest convenient date.

If you have any questions concerning the information presented above, please contact John Novi at (805) 654-2462 or John.Novi@ventura.org.

Prepared by:



John Novi, Case Planner
Commercial/Industrial Permits Section
Ventura County Planning Division

Reviewed by:



Mindy Fogg, Manager
Commercial/Industrial Permits Section
Ventura County Planning Division

EXHIBITS

- Exhibit 2 Maps
- Exhibit 3 Site Plans
- Exhibit 4 General Plan Consistency Analysis
- Exhibit 5 Conditions of Approval
- Exhibit 6 Letter from Southern California Edison, Dated September 19, 2011



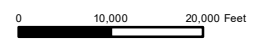
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Ventura County, California
Resource Management Agency
GIS Development & Mapping Services
Map created on 11-21-2022



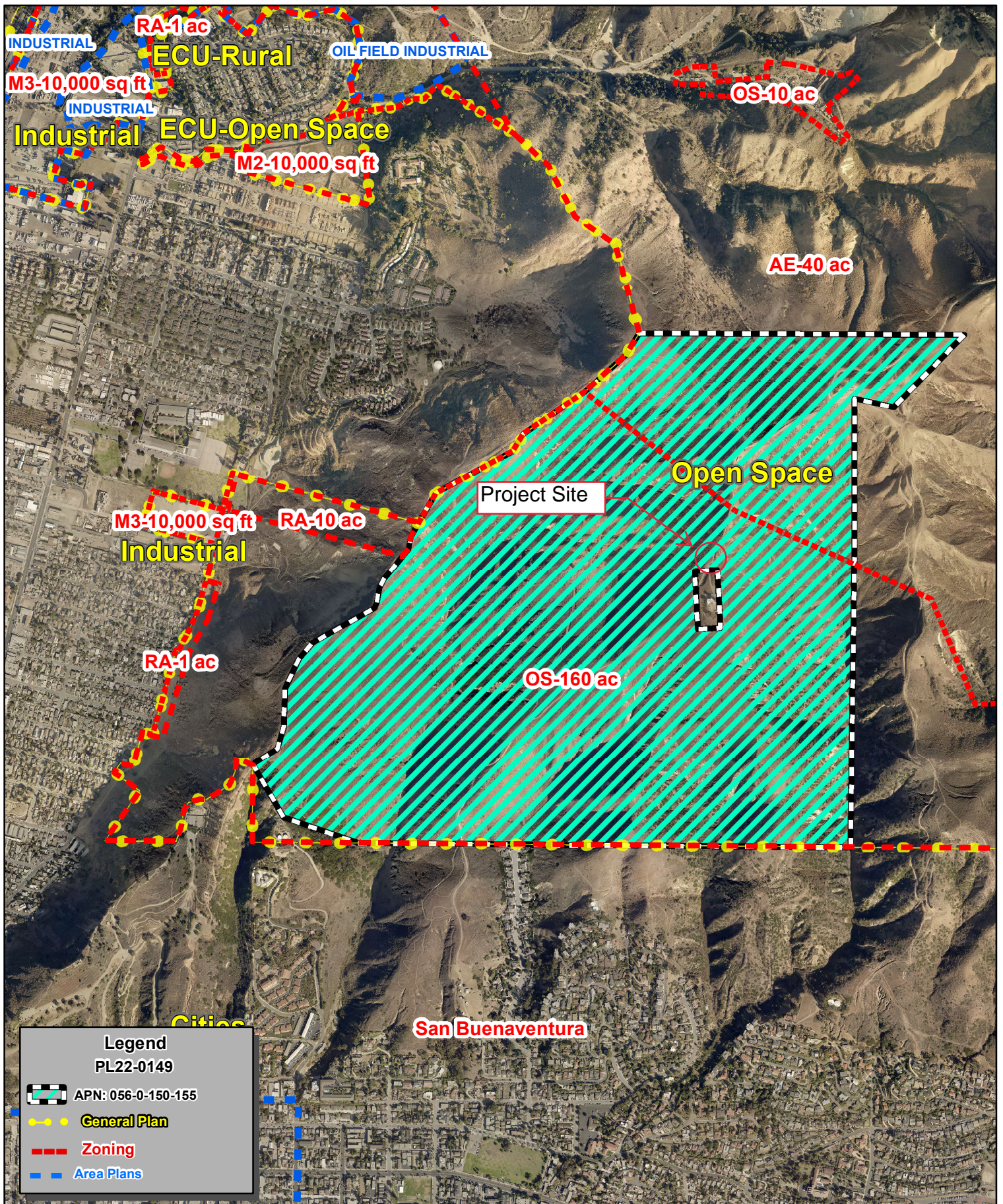
**County of Ventura
Planning Director Hearing
PL22-0149
Location Map**



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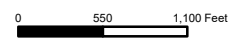
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Ventura County, California
 Resource Management Agency
 GIS Development & Mapping Services
 Map Created on 11-21-2022
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**County of Ventura
 Planning Director Hearing
 PL22-0149
 General Plan & Zoning Map**



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County of Ventura
 Planning Director Hearing
 PL22-0149
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RH

CUP RENEWAL



SITE NUMBER: 871466 **CITY: VENTURA**
SITE NAME: HALL MOUNTAIN **COUNTY: VENTURA**
SITE TYPE: SELF SUPPORT TOWER **JURISDICTION: VENTURA COUNTY**



200 SPECTRUM, SUITE 1700
 IRVINE, CA 92618

PLANS PREPARED BY:



7543 Woodley Ave., #201, Van Nuys, CA 91406
 Office: (818) 840-0808 Fax: (818) 840-0708

PROJECT INFORMATION:

(CUP RENEWAL)
 BU# 871466
 HALL MOUNTAIN

1 CRIMEA RD.
 VENTURA, CA 93001
 SELF SUPPORT TOWER

ISSUED FOR:

ZONING

REV.: DATE: DESCRIPTION: BY:

| | | | |
|---|----------|---------------------------|-----|
| A | 08/30/22 | 90% ZD, ISSUED FOR REVIEW | VHB |
| B | 09/19/22 | 100% ZD | PAD |

DRAWN BY: CHK.: APV.:

| | | |
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| VHB | LK | LK |
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SHEET TITLE:

TITLE SHEET

SHEET NUMBER: REVISION:

T-1

B

BU# 871466

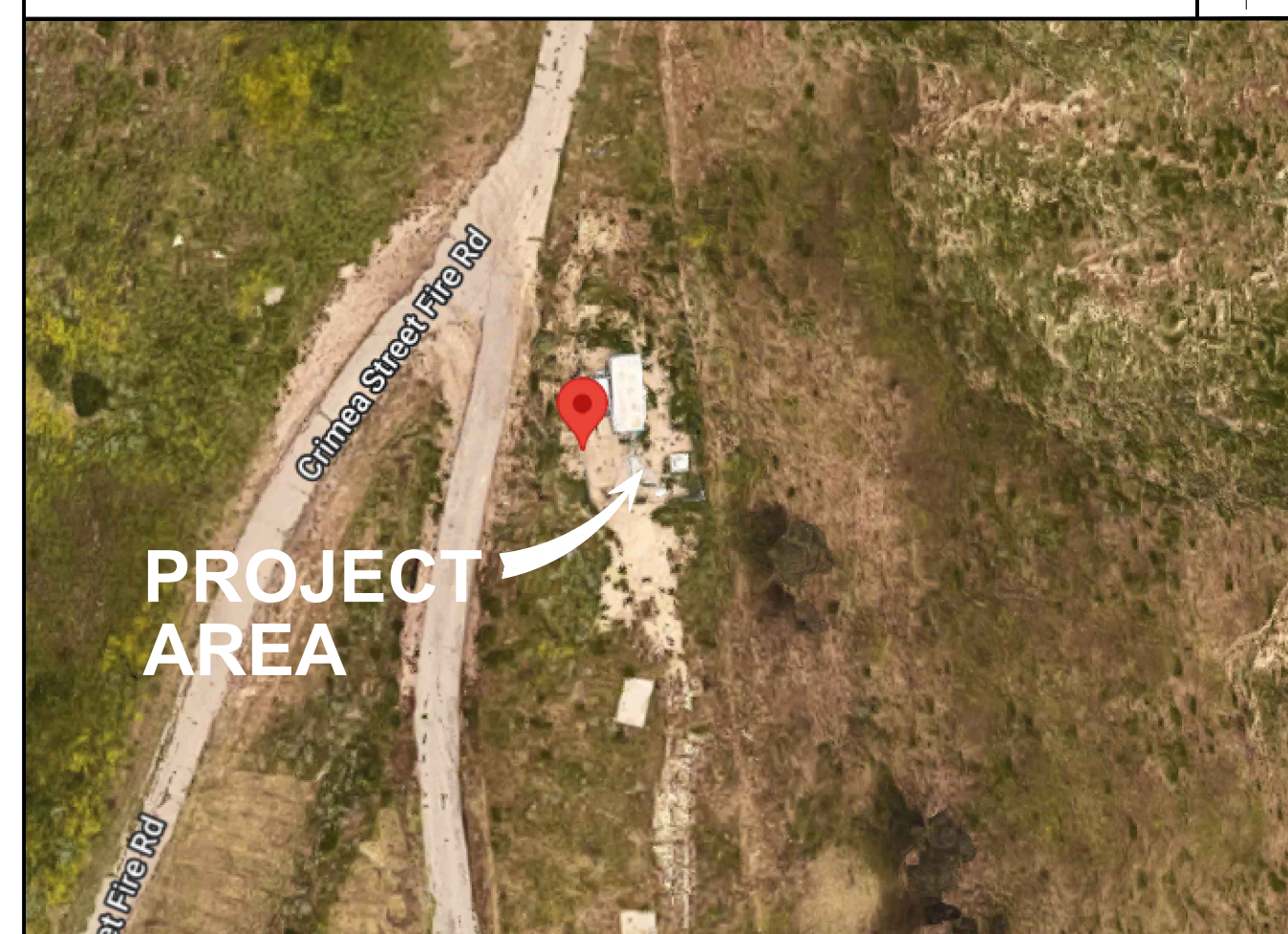
| SITE INFORMATION | |
|----------------------------|--|
| SITE ADDRESS: | 1 CRIMEA RD. VENTURA, CA 93001 |
| PROPERTY OWNER: | VENTURA LAND TRUST PO BOX 1284 VENTURA, CA 93002-1284 |
| APPLICANT AND TOWER OWNER: | CROWN CASTLE 200 SPECTRUM, SUITE 1700 IRVINE, CA 92618 |
| LATITUDE (NAD 83): | 34.29735 |
| LONGITUDE (NAD 83): | -119.27354 |
| LONGITUDE/LATITUDE TYPE: | NAD 83 |
| GROUND ELEVATION: | 1154.5 FT |
| APN #: | 064-0-150-155 |
| ZONING JURISDICTION: | COUNTY OF VENTURA |
| CURRENT ZONING: | OS-160 cc |
| PROPOSED USE: | UNMANNED TELECOMMUNICATIONS FACILITY |
| CONSTRUCTION TYPE: | V-B |
| OCCUPANCY GROUP: | U-2 |
| LEASE AREA (SF): | - |

| PROJECT TEAM | |
|---|---|
| CROWN CASTLE PROJECT MANAGER: | SYNERGY PROJECT MANAGER: |
| CROWN CASTLE 200 SPECTRUM, SUITE 1700 IRVINE, CA 92618 CONTACT: JIM LEE PHONE: (714) 642-8036 FAX: (724) 416-6454 | SYNERGY A DIVISION OF ADVANTAGE ENGINEERS, LLC 7543 WOODLEY AVENUE, SUITE 201 VAN NUYS, CA 91406 CONTACT: JILLIANNE NEWCOMER PHONE: (951) 382-2523 EMAIL: JNewcomer@synergy.cc |
| SAC/ZONING/PERMITTING: | A&E SPECIALIST: |
| SYNERGY A DIVISION OF ADVANTAGE ENGINEERS, LLC 7543 WOODLEY AVENUE, SUITE 201 VAN NUYS, CA 91406 CONTACT: LYNDA McCLUNG PHONE: (714) 328-3385 EMAIL: LMClung@synergy.cc | SYNERGY A DIVISION OF ADVANTAGE ENGINEERS, LLC 7543 WOODLEY AVENUE, SUITE 201 VAN NUYS, CA 91406 CONTACT: LESZEK KRASUSKI, P.E. PHONE: (818) 590-6317 EMAIL: LKrasuski@synergy.cc |

| DRAWING INDEX | |
|---------------|--------------------|
| SHEET | DESCRIPTION |
| T-1 | TITLE SHEET |
| A-1 | OVERALL SITE PLAN |
| A-2 | ENLARGED SITE PLAN |
| A-3 | ELEVATIONS |



VICINITY MAP



PROJECT AREA

| GENERAL NOTES |
|---|
| THE FACILITY IS UNMANNED AND NOT FOR HUMAN HABITATION. A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINAGE; NO SANITARY SEWER SERVICE, POTABLE WATER, OR TRASH DISPOSAL IS REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED. |

| APPROVAL | | | |
|------------------|------------|-----------|------|
| | PRINT NAME | SIGNATURE | DATE |
| LANDLORD: | | | |
| ZONING MGR: | | | |
| DEVELOP. MGR: | | | |
| CONST. MGR: | | | |
| PROJECT MGR: | | | |
| SR. RF ENGINEER: | | | |
| RF ENGINEER: | | | |
| OPERATIONS: | | | |
| SAC REP.: | | | |
| UTILITIES: | | | |
| REAL ESTATE MGR: | | | |

| ACCESSIBILITY REQUIREMENTS |
|---|
| THE FACILITY IS UNMANNED AND NOT FOR CONTINUOUS HUMAN HABITATION. HANDICAPPED ACCESS IS NOT REQUIRED PER CBC 2019, SECTION 11B-203.4 (LIMITED ACCESS SPACES) SECTION 11B-203.5 (MACHINERY SPACES) |

| CODE COMPLIANCE |
|---|
| 1. CALIFORNIA ADMINISTRATIVE CODE (INCL. TITLES 24 & 25) 2019 2. CALIFORNIA BUILDING CODES 2019 3. CALIFORNIA ELECTRICAL CODES 2019 4. CALIFORNIA MECHANICAL CODES 2019 5. CALIFORNIA PLUMBING CODES 2019 6. ANSI / TIA-222-H-2017 7. CITY / COUNTY ORDINANCES 8. CALIFORNIA FIRE CODE 2019 EDITION 9. ASCE 7-16 10. ACI 318-14 11. STEEL CONSTRUCTION MANUAL, 15TH EDITION |

| PROJECT DESCRIPTION |
|--|
| THE PROJECT ENTAILS: CROWN CASTLE IS REQUESTING A RENEWAL OF THE CONDITIONAL USE PERMIT FOR THE CONTINUED USE AND OPERATION OF AN EXISTING WIRELESS TELECOMMUNICATIONS FACILITY CONSISTING OF A 80FT LATTICE TOWER LOCATED IN THE CITY OF VENTURA. THE FACILITY CONSISTS OF: <ul style="list-style-type: none"> (E) (1) WHIP ANTENNA AT 78 FT (E) (3) WHIP ANTENNAS AT 58 FT (E) (1) WHIP ANTENNA AT 36 FT (E) (1) MICROWAVE DISH AT 8 FT (E) (1) GENERATOR WITH PROPANE TANK |

| DO NOT SCALE DRAWINGS |
|---|
| SUBCONTRACTOR SHALL VERIFY ALL PLANS & EXISTING DIMENSIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ENGINEER IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME. |

NOTE:
 INFORMATION CONTAINED WITHIN DRAWINGS IS BASED ON
 PROVIDED INFORMATION AND IS NOT A RESULT OF FIELD SURVEY



200 SPECTRUM, SUITE 1700
 IRVINE, CA 92618

PLANS PREPARED BY:



7543 Woodley Ave., #201, Van Nuys, CA 91406
 Office: (818) 840-0808 Fax: (818) 840-0708

PROJECT INFORMATION:

(CUP RENEWAL)
 BU# 871466
 HALL MOUNTAIN

1 CRIMEA RD.
 VENTURA, CA 93001
 SELF SUPPORT TOWER

ISSUED FOR:

ZONING

REV.: DATE: DESCRIPTION: BY:

| REV. | DATE | DESCRIPTION | BY |
|------|----------|---------------------------|-----|
| A | 08/30/22 | 90% ZD, ISSUED FOR REVIEW | VHB |
| B | 09/19/22 | 100% ZD | PAD |

DRAWN BY: CHK.: APV.:

| | | |
|-----|----|----|
| VHB | LK | LK |
|-----|----|----|

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 OF A LICENSED PROFESSIONAL ENGINEER, TO
 ALTER THIS DOCUMENT.

SHEET TITLE:

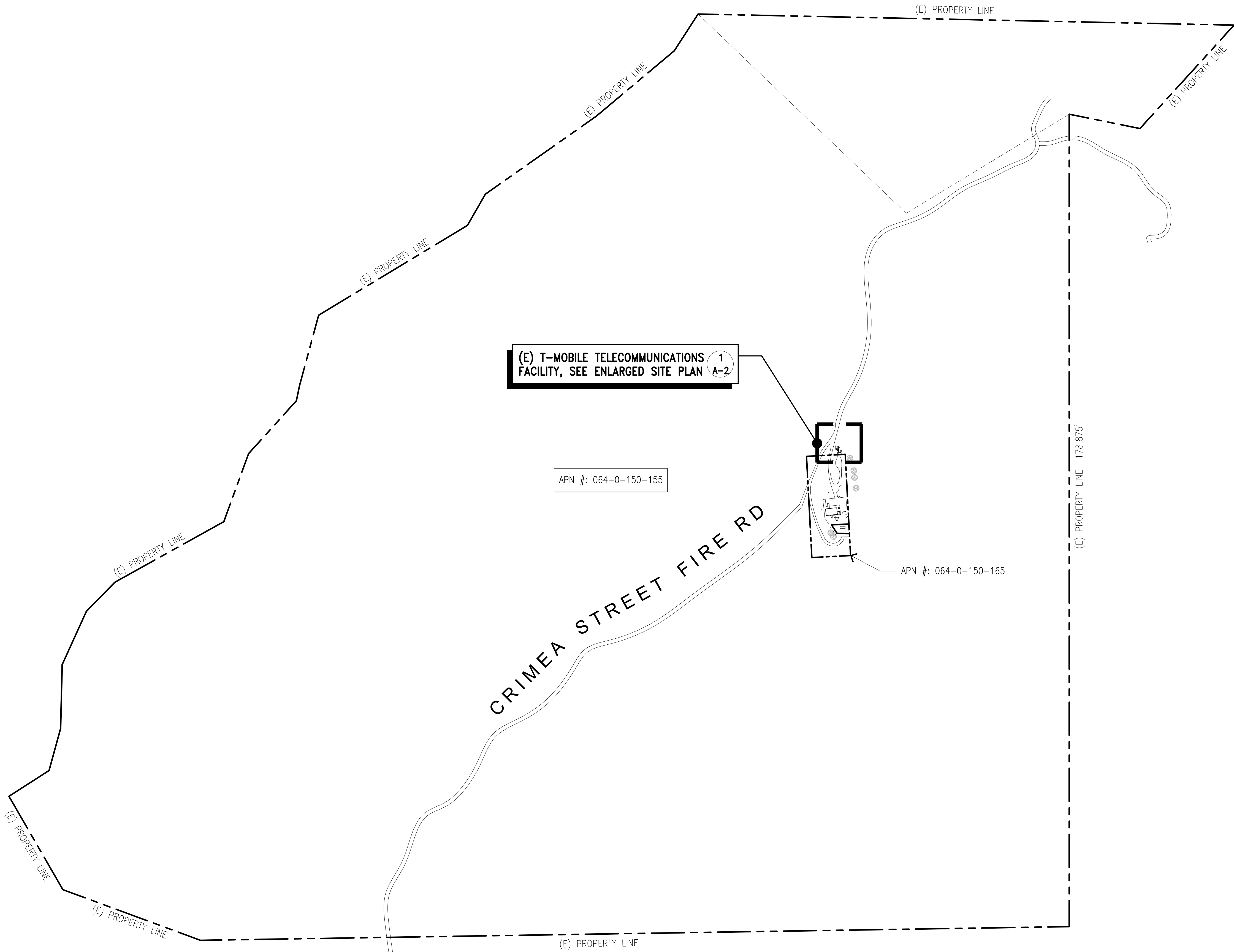
OVERALL SITE PLAN

SHEET NUMBER: REVISION:

A-1

B

BU# 871466



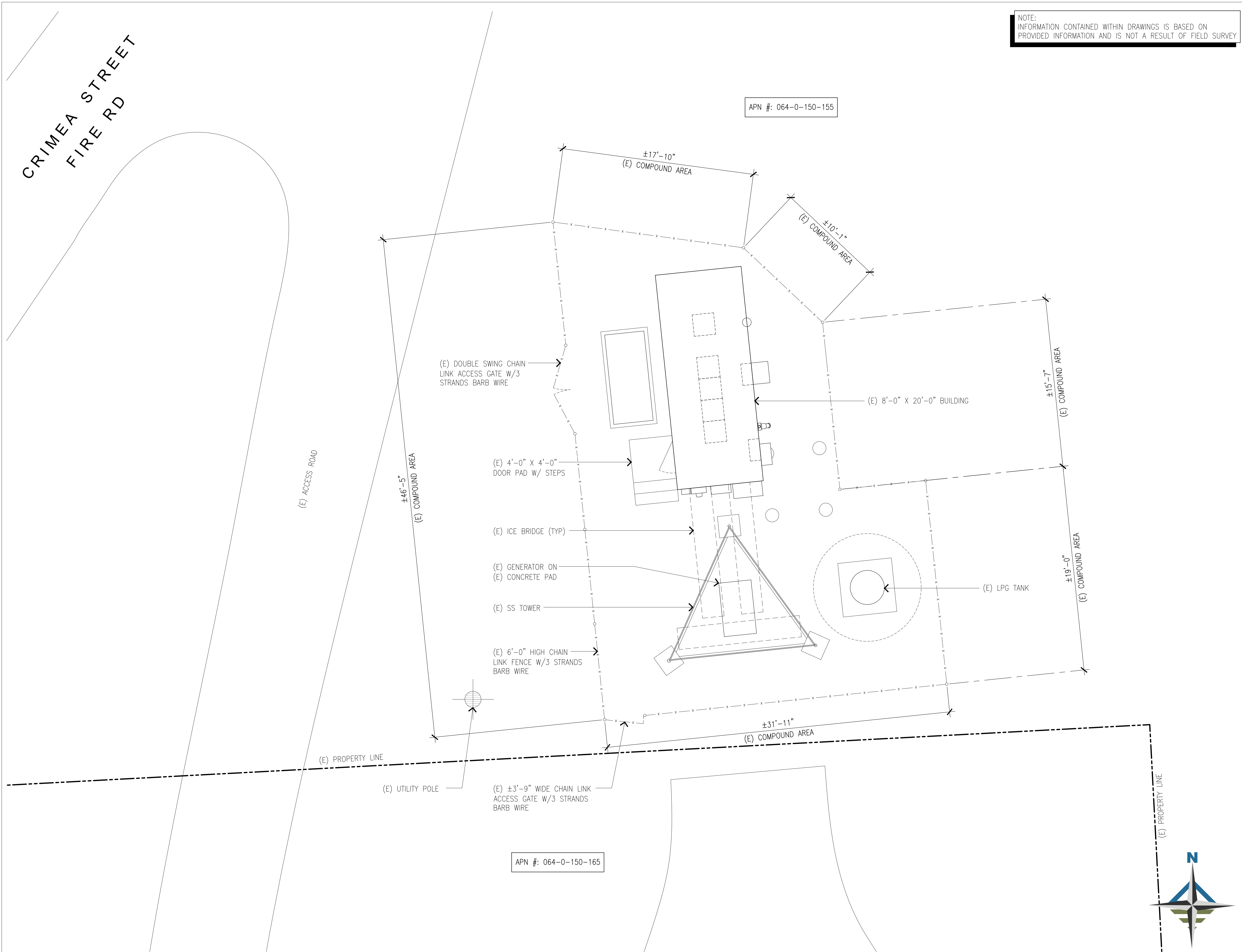
OVERALL SITE PLAN

SCALE: 1"=300'-0"
 0 100' 300' 800' 1

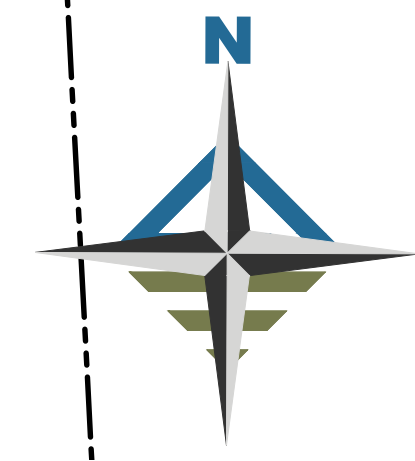
CRIMEA STREET
FIRE RD

NOTE:
INFORMATION CONTAINED WITHIN DRAWINGS IS BASED ON
PROVIDED INFORMATION AND IS NOT A RESULT OF FIELD SURVEY

APN #: 064-0-150-155



APN #: 064-0-150-165



ENLARGED SITE PLAN

SCALE: 1/4"=1'-0"
0 1' 2' 4' 8' 1



200 SPECTRUM, SUITE 1700
IRVINE, CA 92618

PLANS PREPARED BY:



7543 Woodley Ave., #201, Van Nuys, CA 91406
Office: (818) 840-0808 Fax: (818) 840-0708

PROJECT INFORMATION:

(CUP RENEWAL)
BU# 871466
HALL MOUNTAIN

1 CRIMEA RD.
VENTURA, CA 93001
SELF SUPPORT TOWER

ISSUED FOR:

ZONING

REV.: DATE: DESCRIPTION: BY:

| REV. | DATE | DESCRIPTION | BY |
|------|----------|---------------------------|-----|
| A | 08/30/22 | 90% ZD, ISSUED FOR REVIEW | VHB |
| B | 09/19/22 | 100% ZD | PAD |
| | | | |
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DRAWN BY: VHB CHK.: LK APV.: LK

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SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER: REVISION:

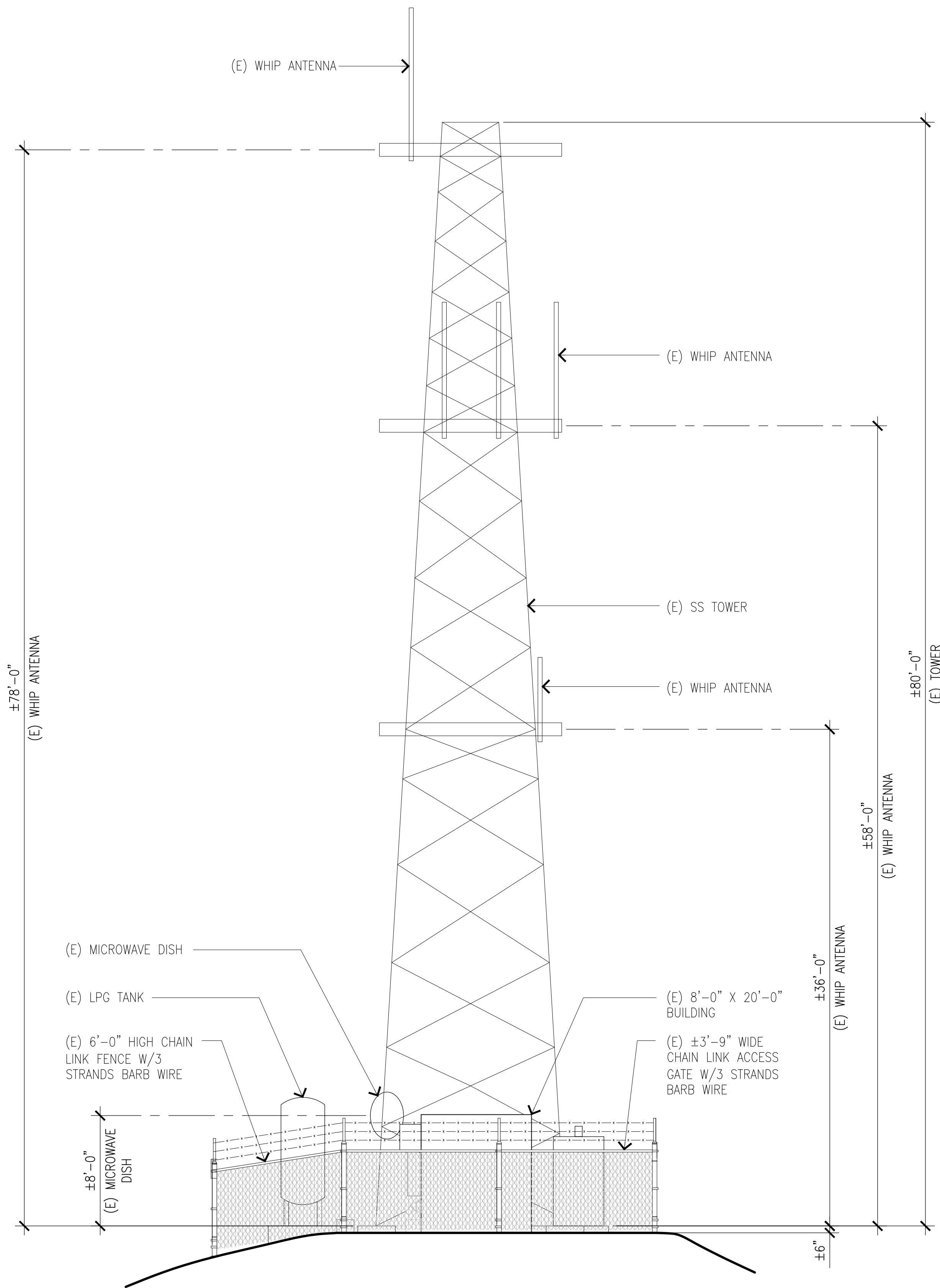
A-2

B
BU# 871466

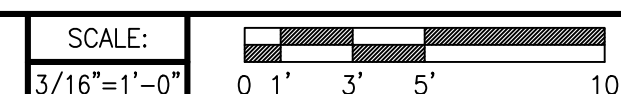
| | | | |
|---|----------|---------------------------|-----|
| A | 08/30/22 | 90% ZD, ISSUED FOR REVIEW | VHB |
| B | 09/19/22 | 100% ZD | PAD |

| | | |
|-----|----|----|
| VHB | LK | LK |
|-----|----|----|

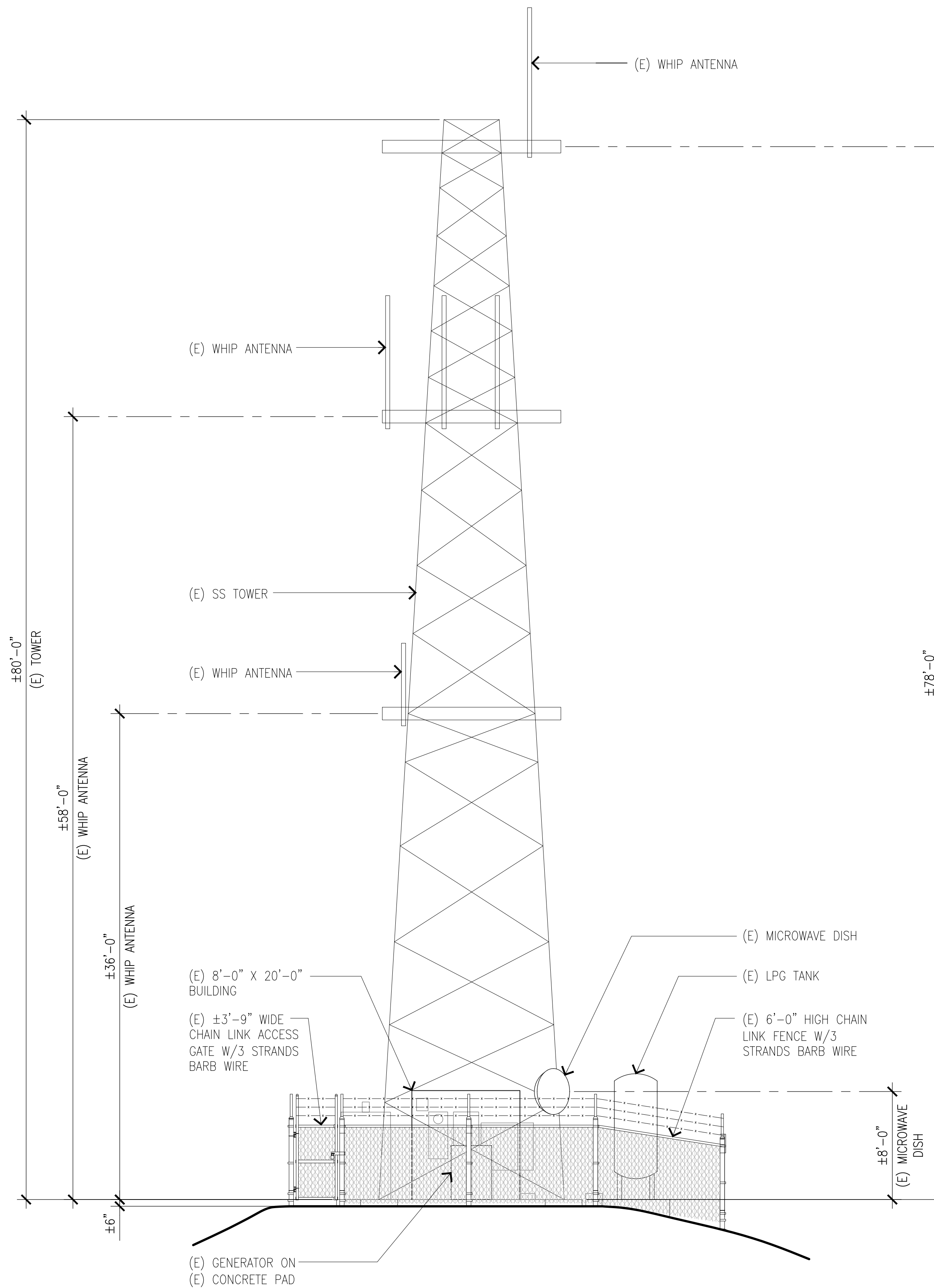
IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.



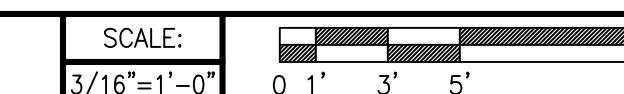
EXISTING NORTHWEST ELEVATION



2



EXISTING SOUTHEAST ELEVATION



1



Exhibit 4 – General Plan Consistency Analysis

County of Ventura • Resource Management Agency • Planning Division

800 S. Victoria Avenue, Ventura, CA 93009-1740 • (805) 654-2478 • vcrma.org/divisions/planning

CONSISTENCY WITH THE GENERAL PLAN FOR “HALL MOUNTAIN” WIRELESS COMMUNICATION FACILITY, CASE NO. PL22-0149

The Ventura County General Plan *Goals, Policies and Programs* (2020, page 1-1) states:

All area plans, specific plans subdivision, public works projects, and zoning decisions must be consistent with the direction provided in the County’s General Plan.

Furthermore, the Ventura County Non-Coastal Zoning Ordinance (NCZO) (Section 8111-1.2.1.1.a) states that in order to be approved, a project must be found consistent with all applicable policies of the Ventura County General Plan.

The proposed project would authorize a Minor Modification of Conditional Use Permit (CUP) LU11-0008 for the continued use, operation, and maintenance of an existing wireless communication facility (WCF) for a 10-year period (Case No. PL22-0149).

Evaluated below is the consistency of the proposed project with the applicable policies of the General Plan *Goals, Policies and Programs*.

- COS 3.1 Scenic Roadways Policy:** *The County shall protect the visual character of scenic resources visible from state or County designated scenic roadways.*

COS 3.5 Ridgeline and Hilltop Preservation Policy: *The County shall ensure that ridgelines and major hilltops remain undeveloped and that discretionary development is sited and designed to remain below significant ridgelines, except as required for communication or similar facilities.*

COS 3.6 Open Space Character Policy: *The County shall require discretionary development outside of Existing Communities be planned and designed to maintain the scenic open space character of the surrounding area, including view corridors from highways. Discretionary development should integrate design, construction, and maintenance techniques that minimize the visibility of structures from public viewing locations within scenic vistas.*

The proposed project would authorize the continued operation of an existing WCF that is located set back from the top of a hilltop. The existing 80-foot-tall lattice tower is located approximately 8,000 feet east of Highway 33 (an Eligible State Scenic Highway) and 6,000 feet north of Foothill Boulevard (an Eligible State Scenic Highway). Due to the surrounding topography, the tower is not prominently visible from public viewpoints. There are no operational or physical changes proposed as part of the project. Thus, there would be no new visual impacts and

the existing development would remain compatible with the character of the surrounding development.

Based on the discussion above, the proposed project is consistent with General Plan Policies COS-3.1, COS-3.5, and COS-3.6.

2. **EV-5.2 Energy Infrastructure:** *The County shall work to improve energy infrastructure to increase availability, reliability, sustainability, and use of renewable energy sources, with a focus on Existing Communities and equity in service to disadvantaged communities.*

The existing WCF is used exclusively for essential public safety communications by Southern California Edison (SCE) to ensure that electricity and related infrastructure is in working order. The continued use of the WCF will improve energy infrastructure to increase availability, reliability, and sustainability of electricity to the County.

Based on the discussion above, the proposed project is consistent with General Plan Policy EV-5.2.

3. **LU-16.1 Community Character and Quality of Life:** *The County shall encourage discretionary development to be designed to maintain the distinctive character of unincorporated communities, to ensure adequate provision of public facilities and services, and to be compatible with neighboring uses.*

LU-16.2 Urban Design Standards for Commercial and Industrial Development: *The County shall require that discretionary commercial and industrial developments maintain high standards of urban design and environmental quality by incorporating compact form, maximizing pedestrian access and safety, and minimizing land use conflicts and traffic congestion.*

The existing WCF is located on a ridgeline that is set back and not prominently visible by public viewpoints. The WCF is designed as an 80-foot-tall lattice tower with antennas located at various heights on the tower and a maximum height of 90 feet one-inch from finished grade. The design and color of the WCF would continue to blend in with the surrounding land uses. The site is accessed via Crimea Fire Road. The WCF would continue to provide public safety communication services solely to SCE and remain compatible with the neighboring land uses. No new land use conflicts or visual impacts would occur with the continued use of the WCF. There are no operational or physical changes proposed as part of the project. Lastly, no water is required for this project.

Based on the discussion above, the proposed project is consistent with General Plan Policies LU-16.1 and LU-16.2.

- 4. PFS- 1.1 Equitable Provision of Public Facilities and Services:** *The County shall require that facilities and services that are essential for public health and safety shall be equitably provided for all residents and businesses.*

PFS-7.1 Accessible Public Utilities: *The County shall work with utility companies and service providers to ensure that gas, electric, broadband, cellular mobile communications, cable television, and telephone utility transmission lines are located appropriately to provide for adequate services throughout the unincorporated area.*

The WCF will continue to essential public safety communications to SCE throughout the unincorporated Ventura area. The continued use of the facility ensures that the residents and businesses will maintain a electricity service.

Based on the discussion above, the proposed project is consistent with General Plan Policies PFS-1.1 and PFS-7.1.

**DRAFT CONDITIONS OF APPROVAL FOR CONDITIONAL USE PERMIT (CUP)
CASE NO. PL22-0149 FOR “HALL MOUNTAIN” WIRELESS COMMUNICATION
FACILITY (WCF)**

RESOURCE MANAGEMENT AGENCY (RMA)

Planning Division Conditions

1. Project Description

This Conditional Use Permit is based on and limited to compliance with the project description stated in this condition below, all exhibits of the Planning Director hearing on May 11, 2023, and conditions of approval set forth below. Together, these conditions and documents describe the “Project.” Any deviations from the Project must first be reviewed and approved by the County in order to determine if the Project deviations conform to the Project as approved. Project deviations may require Planning Director approval for changes to the permit or further California Environmental Quality Act (CEQA) environmental review, or both. Any Project deviation that is implemented without requisite County review and approval(s) may constitute a violation of the conditions of this permit and applicable law.

The Project description is as follows:

A modified CUP has been granted to authorize the continued use, operation, and maintenance of an existing WCF exclusively for public safety. The facility consists of an 80-foot-tall lattice tower, a 160-square-foot equipment shelter, a propane generator, and a 499-gallon propane tank. The WCF is used exclusively for public safety communications by Southern California Edison (SCE). There are six (6) antennas mounted at following heights on the tower:

- One (1) whip antenna located 78 feet above grade level;
- Three (3) whip antennas located 58 feet above grade level;
- One (1) whip antenna located 36 feet above grade level; and
- One (1) microwave dish antenna located 8 feet above grade level.

The whip antenna located at 78 feet above grade extends 10 feet one-inch above the top of the 80-foot tower to a maximum height of 90 feet one-inch above finished grade. The WCF and associated equipment is located within a 1,100-square-foot lease area that is enclosed by a 6-foot-tall chain-link fence equipped with barbwire. The WCF is unmanned, except for occasional periodic maintenance visits, and would continue to operate 24 hours per day. The unmanned facility does not require water to operate. Access to the site is available via Crimea Fire Road connected School Canyon Road. No exterior lighting, grading, or fencing was proposed with the project.

The use and maintenance of the property, the size, shape, arrangement, and location of structures, parking areas and landscape areas, and the protection and preservation of

resources shall conform to the project description above and all approved County land use hearing exhibits in support of the Project and conditions of approval below.

2. Site Maintenance

Purpose: To ensure that the Project site is maintained in a neat and orderly manner so as not to create any hazardous conditions or unsightly conditions which are visible from outside of the Project site.

Requirement: The Permittee shall maintain the Project site in a neat and orderly manner, and in compliance with the Project description set forth in Condition No. 1. Only equipment and/or materials which the Planning Director determines to substantially comply with the Project description shall be stored within the Project site during the life of the Project.

Documentation: The Permittee shall maintain the Project site in compliance with Condition No. 1 and the approved plans for the Project.

Timing: The Permittee shall maintain the Project site in a neat and orderly manner and in compliance with Condition No. 1 throughout the life of the Project.

Monitoring and Reporting: The County Building Inspector, Public Works Agency Grading Inspector, Fire Marshall, and/or Planning Division staff has the authority to conduct periodic site inspections to ensure the Permittee's ongoing compliance with this condition consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

3. CUP Modification

Prior to undertaking any operational or construction-related activity which is not expressly described in these conditions, the Permittee shall first contact the Planning Director to determine if the proposed activity requires a modification of this CUP. The Planning Director may, at the Planning Director's sole discretion, require the Permittee to file a written and/or mapped description of the proposed activity in order to determine if a CUP modification is required. If a CUP modification is required, the modification shall be subject to:

- a. The modification approval standards of the Ventura County Ordinance Code in effect at the time the modification application is acted on by the Planning Director; and
- b. Environmental review, as required pursuant to the California Environmental Quality Act (CEQA; California Public Resources Code, §§ 21000-21178) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, §§ 15000-15387), as amended from time to time.

4. Acceptance of Conditions and Schedule of Enforcement Responses

The Permittee's acceptance of this CUP and/or commencement of construction and/or operations under this CUP shall constitute the Permittee's formal agreement to comply with all conditions of this CUP. Failure to abide by and comply with any condition of this CUP shall constitute grounds for enforcement action provided in the Ventura County Non-Coastal Zoning Ordinance (Article 14), which shall include, but is not limited to, the following:

- a. Public reporting of violations to the Planning Commission and/or Board of Supervisors;
- b. Suspension of the permitted land uses (Condition No. 1);
- c. Modification of the CUP conditions listed herein;
- d. Recordation of a "Notice of Noncompliance" on the deed to the subject property;
- e. The imposition of civil administrative penalties; and/or
- f. Revocation of this CUP.

The Permittee is responsible for being aware of and complying with the CUP conditions and all applicable federal, state, and local laws and regulations.

5. Time Limits

- a. Use inauguration:
 - (2) The approval decision for this CUP becomes effective upon the expiration of the 10-day appeal period following the approval decision/date on which the Planning Director rendered the decision on the Project, or when any appeals of the decision are finally resolved. Once the approval decision becomes effective, the Permittee must obtain a Zoning Clearance for use inauguration in order to initiate the land uses set forth in Condition No. 1.
 - (3) This CUP shall expire and become null and void if the Permittee fails to obtain a Zoning Clearance for use inauguration within one year (see the Ventura County Non-Coastal Zoning Ordinance (§ 8111-4.7)) from the date the approval decision of this CUP becomes effective. The Planning Director may grant a one-year extension of time to the Permittee in order to obtain the Zoning Clearance for use inauguration if the Permittee can demonstrate to the satisfaction of the Planning Director that the Permittee has made a diligent effort to implement the Project, and the Permittee has requested the time extension in writing at least 30 days prior to the one-year expiration date.
 - (4) Prior to the issuance of the Zoning Clearance for use inauguration, all fees and charges billed to that date by any County agency, as well as any fines, penalties, and sureties, must be paid in full. After issuance of the Zoning

Clearance for use inauguration, any final billed processing fees must be paid within 30 days of the billing date or the County may revoke this CUP.

- b. Permit Life or Operations Period: This CUP will expire on **[DATE 10 years after approval]**. The lack of additional notification of the expiration date provided by the County to the Permittee shall not constitute grounds to continue the uses that are authorized by this CUP after the CUP expiration date. The uses authorized by this CUP may continue after the CUP expiration date if:

- (1) The Permittee has filed a permit modification application pursuant to § 8111-6 of the Ventura County Non-Coastal Zoning Ordinance prior to **[DATE 10 years after approval]**; and
- (2) The County decision-maker grants the requested modification.

The uses authorized by this CUP may continue during processing of a timely-filed modification application in accordance with § 8111-2.10 of the Ventura County Non-Coastal Zoning Ordinance.

6. Documentation Verifying Compliance with Other Agencies' Requirements Related to this CUP

Purpose: To ensure compliance with, and notification of, federal, state, and/or local government regulatory agencies that have requirements that pertain to the Project (Condition No. 1, above) that is the subject of this CUP.

Requirement: Upon the request of the Planning Director, the Permittee shall provide the Planning Division with documentation (e.g., copies of permits or agreements from other agencies, which are required pursuant to a condition of this CUP) to verify that the Permittee has obtained or satisfied all applicable federal, state, and local entitlements and conditions that pertain to the Project.

Documentation: The Permittee shall provide this documentation to Planning Division staff in the form that is acceptable to the agency issuing the entitlement or clearance, to be included in the Planning Division Project file.

Timing: The documentation shall be submitted to the Planning Division prior to the issuance of the Zoning Clearance for use inauguration or as dictated by the respective agency.

Monitoring and Reporting: The Planning Division maintains the documentation provided by the Permittee in the respective Project file. In the event that the federal, state, or local government regulatory agency prepares new documentation due to changes in the Project or the other agency's requirements, the Permittee shall submit the new documentation within 30 days of receipt of the documentation from the other agency.

7. Notice of CUP Requirements and Retention of CUP Conditions On Site

Purpose: To ensure full and proper notice of these CUP conditions affecting the use of the subject property.

Requirement: Unless otherwise required by the Planning Director, the Permittee shall notify, in writing, the Property Owner(s) of record, contractors, and all other parties and vendors who regularly conduct activities associated with the Project, of the pertinent conditions of this CUP.

Documentation: The Permittee shall maintain a current set of CUP conditions and exhibits at the project site or, in the case of projects where this is impractical (e.g., telecommunication sites), use “present to the Planning Division staff copies of the conditions, upon Planning Division staff’s request.”.

Timing: Prior to issuance of a Zoning Clearance for use inauguration and throughout the life of the Project.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure ongoing compliance with this condition consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

8. Recorded Notice of Land Use Entitlement

Purpose: The Permittee shall record a “Notice of Land Use Entitlement” form and the conditions of this CUP with the deed for the subject property that notifies the current and future Property Owner(s) of the conditions of this CUP.

Requirement: The Permittee shall sign, have notarized, and record with the Office of the County Recorder, a “Notice of Land Use Entitlement” form furnished by the Planning Division and the conditions of this CUP with the deed of the property that is subject to this CUP.

Documentation: Recorded “Notice of Land Use Entitlement” form and conditions of this CUP.

Timing: The Permittee shall record the “Notice of Land use Entitlement” form and conditions of this CUP, prior to issuance of a Zoning Clearance for use inauguration.

Monitoring and Reporting: The Permittee shall return a copy of the recorded “Notice of Land Use Entitlement” form and conditions of this CUP to Planning Division staff to be included in the Project file.

9. Financial Responsibility for Compliance Monitoring and Enforcement

- a. **Cost Responsibilities:** The Permittee shall bear the full costs of all County staff time, materials, and County-retained consultants associated with condition compliance review and monitoring, CEQA mitigation monitoring, other permit monitoring programs, and enforcement activities, actions, and processes conducted pursuant to the Ventura County Non-Coastal Zoning Ordinance (§ 8114-3) related to this CUP. Such condition compliance review, monitoring and enforcement activities may include (but are not limited to): periodic site inspections; preparation, review, and approval of studies and reports; review of permit conditions and related records; enforcement hearings and processes; drafting and implementing compliance agreements; and attending to the modification, suspension, or revocation of permits. Costs will be billed at the rates set forth in the Planning Division or other applicable County Fee Schedule, and at the contract rates of County-retained consultants, in effect at the time the costs are incurred.
- b. **Establishment of Revolving Compliance Account:**
 - (1) Pursuant to the requirements of CUP LU11-0008 (Case No. PL22-0149), the Resource Management Agency created Condition Compliance Case No. CC17-0012 to cover the costs associated with condition compliance review, monitoring, and enforcement activities, and any duly-imposed civil administrative penalties, regarding CUP LU11-0008 (Case No. PL22-0149). The Planning Division will continue to use Condition Compliance Case No. CC17-0012 to cover the costs associated with condition compliance review, monitoring, and enforcement activities described in subsection 9.a (above), and any duly-imposed civil administrative penalties regarding this CUP.
 - (2) Within 10 calendar days of the effective date of the final decision approving this CUP, the Permittee shall submit a new, updated, and completed reimbursement agreement for Condition Compliance Case No. CC17-0012, in a form provided by the Planning Division, obligating the Permittee to pay all condition compliance review, monitoring, and enforcement costs, and any civil administrative penalties, subject to the Permittee's right to challenge all such charges and penalties prior to payment.
- c. **Billing Process:** The Permittee shall pay all Planning Division invoices within 30 days of receipt thereof. Failure to timely pay an invoice shall subject the Permittee to late fees and charges set forth in the Planning Division Fee Schedule, and shall be grounds for suspension, modification, or revocation of this CUP. The Permittee shall have the right to challenge any charge or penalty prior to payment.

10. Defense and Indemnification

- a. The Permittee shall defend, at the Permittee's sole expense with legal counsel acceptable to the County, against any and all claims, actions, or proceedings against the County, any other public agency with a governing body consisting of the members of the County Board of Supervisors, or any of their respective board members, officials, employees and agents (collectively, "Indemnified Parties") arising out of or in any way related to the County's issuance, administration, or enforcement of this CUP. The County shall promptly notify the Permittee of any such claim, action or proceeding and shall cooperate fully in the defense.
- b. The Permittee shall also indemnify and hold harmless the Indemnified Parties from and against any and all losses, damages, awards, fines, expenses, penalties, judgments, settlements, or liabilities of whatever nature, including but not limited to court costs and attorney fees (collectively, "Liabilities"), arising out of or in any way related to any claim, action or proceeding subject to subpart (a) above, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties.
- c. Except with respect to claims, actions, proceedings, and Liabilities resulting from an Indemnified Party's sole active negligence or intentional misconduct, the Permittee shall also indemnify, defend (at Permittee's sole expense with legal counsel acceptable to County), and hold harmless the Indemnified Parties from and against any and all claims, actions, proceedings, and Liabilities arising out of, or in any way related to, the construction, maintenance, land use, or operations conducted pursuant to this CUP, regardless of how a court apportions any such Liabilities as between the Permittee, the County, and/or third parties. The County shall promptly notify the Permittee of any such claim, action, or proceeding and shall cooperate fully in the defense.
- d. Neither the issuance of this CUP, nor compliance with the conditions hereof, shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property; nor shall the issuance of this CUP serve to impose any liability upon the Indemnified Parties for injury or damage to persons or property.

11. Invalidation of Condition(s)

If any of the conditions or limitations of this CUP are held to be invalid in whole or in part by a court of competent jurisdiction, that holding shall not invalidate any of the remaining CUP conditions or limitations. In the event that any condition imposing a fee, exaction, dedication, or other mitigation measure is challenged by the Permittee in an action filed in a court of competent jurisdiction, or threatened to be filed therein, the Permittee shall be required to fully comply with this CUP, including without limitation, by remitting the fee, exaction, dedication, and/or by otherwise performing all mitigation measures being

challenged. This CUP shall continue in full force unless, until, and only to the extent invalidated by a final, binding judgment issued in such action.

If a court of competent jurisdiction invalidates any condition in whole or in part, and the invalidation would change the findings and/or the mitigation measures associated with the approval of this CUP, at the discretion of the Planning Director, the Planning Director may review the project and impose substitute feasible conditions/mitigation measures to adequately address the subject matter of the invalidated condition. The Planning Director shall make the determination of adequacy. If the Planning Director cannot identify substitute feasible conditions/mitigation measures to replace the invalidated condition and cannot identify overriding considerations for the significant impacts that are not mitigated to a level of insignificance as a result of the invalidation of the condition, then this CUP may be revoked.

12. Consultant Review of Information and Consultant Work

The County and all other County permitting agencies for the Project have the option of referring any and all special studies that these conditions require to an independent and qualified consultant for review and evaluation of issues beyond the expertise or resources of County staff.

Prior to the County engaging any independent consultants or contractors pursuant to the conditions of this CUP, the County shall confer in writing with the Permittee regarding the necessary work to be contracted, as well as the estimated costs of such work. Whenever feasible, the County will use the lowest responsible bidder or proposer. Any decisions made by County staff in reliance on consultant or contractor work may be appealed pursuant to the appeal procedures contained in the Ventura County Zoning Ordinance Code then in effect.

The Permittee may hire private consultants to conduct work required by the County, but only if the consultant and the consultant's proposed scope-of-work are first reviewed and approved by the County. The County retains the right to hire its own consultants to evaluate any work that the Permittee or a contractor of the Permittee undertakes. In accordance with Condition No. 9 above, if the County hires a consultant to review any work undertaken by the Permittee, or hires a consultant to review the work undertaken by a contractor of the Permittee, the hiring of the consultant will be at the Permittee's expense.

13. Relationship of CUP Conditions, Laws, and Other Entitlements

The Permittee shall implement the Project in compliance with all applicable requirements and enactments of federal, state, and local authorities. In the event of conflict between various requirements, the more restrictive requirements shall apply. In the event the Planning Director determines that any CUP condition contained herein is in conflict with any other CUP condition contained herein, when principles of law do not provide to the

contrary, the CUP condition most protective of public health and safety and environmental resources shall prevail to the extent feasible.

No condition of this CUP for uses allowed by the Ventura County Ordinance Code shall be interpreted as permitting or requiring any violation of law, lawful rules, or regulations, or orders of an authorized governmental agency. Neither the approval of this CUP nor compliance with the conditions of this CUP shall relieve the Permittee from any responsibility otherwise imposed by law for damage to persons or property.

The Permittee shall obtain a business tax certificate and regulatory licenses for the operation of the WCF.

14. Contact Person

Purpose: To designate a person responsible for responding to complaints.

Requirement: The Permittee shall designate a contact person(s) to respond to complaints from citizens and the County which are related to the permitted uses of this CUP. The designated contact person shall be available, via telecommunication, 24 hours a day.

Documentation: The Permittee shall provide the Planning Director with the contact information (e.g., name and/or position title, address, business and cell phone numbers, and email addresses) of the Permittee's field agent who receives all orders, notices, and communications regarding matters of condition and code compliance at the Project site.

Timing: Prior to the issuance of a Zoning Clearance for use inauguration, the Permittee shall provide the Planning Division the contact information of the Permittee's field agent(s) for the Project file. If the address or phone number of the Permittee's field agent(s) should change, or the responsibility is assigned to another person, the Permittee shall provide Planning Division staff with the new information in writing within three calendar days of the change in the Permittee's field agent.

Monitoring and Reporting: The Planning Division maintains the contact information provided by the Permittee in the Project file. The Planning Division has the authority to periodically confirm the contact information consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

15. Change of Permittee

Purpose: To ensure that the Planning Division is properly and promptly notified of any change of Permittee.

Requirement: The Permittee shall file, as an initial notice with the Planning Director, the new name(s), address(es), telephone/FAX number(s), and email addresses of the new owner(s), lessee(s), operator(s) of the permitted uses, and the company officer(s). The

Permittee shall provide the Planning Director with a final notice once the transfer of ownership and/or operational control has occurred.

Documentation: The initial notice must be submitted with the new Permittee's contact information. The final notice of transfer must include the effective date and time of the transfer and a letter signed by the new Property Owner(s), lessee(s), and/or operator(s) of the permitted uses acknowledging and agreeing to comply with all conditions of this CUP.

Timing: The Permittee shall provide written notice to the Planning Director 10 calendar days prior to the change of ownership or change of Permittee. The Permittee shall provide the final notice to the Planning Director within 15 calendar days of the effective date of the transfer.

Monitoring and Reporting: The Planning Division maintains notices submitted by the Permittee in the Project file and has the authority to periodically confirm the information consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

16. Paleontological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to paleontological resources that may be encountered during ground disturbance or construction activities.

Requirement: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall:

- a. Cease operations and assure the preservation of the area in which the discovery was made;
- b. Notify the Planning Director in writing, within three days of the discovery;
- c. Obtain the services of a paleontological consultant or professional geologist who shall assess the find and provide a report that assesses the resources and sets forth recommendations on the proper disposition of the site;
- d. Obtain the Planning Director's written concurrence with the recommended disposition of the site before resuming development; and
- e. Implement the agreed upon recommendations.

Documentation: The Permittee shall submit the paleontologist's or geologist's reports. Additional documentation may be required to demonstrate that the Permittee has implemented the recommendations set forth in the paleontological report.

Timing: If any paleontological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the paleontological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Permittee shall provide the paleontological report to the Planning Division to be made part of the Project file. The Permittee shall implement any recommendations made in the paleontological report to the satisfaction of the Planning Director. The paleontologist shall monitor all ground disturbance activities within the area in which the discovery was made, in order to ensure the successful implementation of the recommendations made in the paleontological report. The Planning Division has the authority to conduct site inspections to ensure that the Permittee implements the recommendations set forth in the paleontological report, consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Note: This condition has been satisfied and would only apply to future development of the site if proposed.

17. Archaeological Resources Discovered During Grading

Purpose: In order to mitigate potential impacts to archaeological resources discovered during ground disturbance.

Requirement: The Permittee shall implement the following procedures:

- a. If any archaeological or historical artifacts are uncovered during ground disturbance or construction activities, the Permittee shall:
 1. Cease operations and assure the preservation of the area in which the discovery was made;
 2. Notify the Planning Director in writing, within three days of the discovery;
 3. Obtain the services of a County-approved archaeologist who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
 4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development; and
 5. Implement the agreed upon recommendations.

- b. If any human burial remains are encountered during ground disturbance or construction activities, the Permittee shall:
 1. Cease operations and assure the preservation of the area in which the discovery was made;

2. Immediately notify the County Coroner and the Planning Director;
3. Obtain the services of a County-approved archaeologist and, if necessary, Native American Monitor(s), who shall assess the find and provide recommendations on the proper disposition of the site in a written report format;
4. Obtain the Planning Director's written concurrence of the recommended disposition of the site before resuming development on-site; and
5. Implement the agreed upon recommendations.

Documentation: If archaeological remains are encountered, the Permittee shall submit a report prepared by a County-approved archaeologist including recommendations for the proper disposition of the site. Additional documentation may be required to demonstrate that the Permittee has implemented any recommendations made by the archaeologist's report.

Timing: If any archaeological remains are uncovered during ground disturbance or construction activities, the Permittee shall provide the written notification to the Planning Director within three days of the discovery. The Permittee shall submit the archaeological report to the Planning Division immediately upon completion of the report.

Monitoring and Reporting: The Permittee shall provide the archaeological report to the Planning Division to be made part of the Project file. The Permittee shall implement any recommendations made in the archaeological report to the satisfaction of the Planning Director. The archaeologist shall monitor all ground disturbance activities within the area in which the discovery was made, in order to ensure the successful implementation of the recommendations made in the archaeological report. The Planning Division has the authority to conduct site inspections to ensure that the Permittee implements the recommendations set forth in the archaeological report, consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Note: This condition has been satisfied and would only apply to future development of the site if proposed.

18. Reporting of Major Incidents

Purpose: To ensure that the Planning Director is notified of major incidents associated with, or resulting from, the Project.

Requirement: The Permittee shall immediately notify the Planning Director by telephone, email, FAX, and/or voicemail of any incidents (e.g., fires, explosions, spills, landslides, or slope failures) that could pose a hazard to life or property inside or outside the Project site.

Documentation: Upon request of any County agency, the Permittee shall provide a written report of any incident that shall include, but is not limited to: a description of the facts of the incident; the corrective measures used, if any; and the steps taken to prevent a recurrence of the incident.

Timing: The Permittee shall provide the written report to the requesting County agency and Planning Division within seven days of receiving the request.

Monitoring and Reporting: The Planning Division maintains any documentation provided by the Permittee related to major incidents in the Project file.

19. Color/Material/Manufacture Specifications

Purpose: To comply with the Ventura County General Plan *Goals, Policies and Programs* Scenic Resources Policies 1.7.2-1 through 1.7.2-4 and to ensure that the communication facility is constructed as illustrated on the approved plans and photo simulations.

Requirement: The Permittee shall:

- i. construct and maintain the exterior surfaces of all buildings and structures of the communication facility using building materials and colors that are compatible with surrounding terrain (e.g., earth tones and non-reflective paints);
- ii. provide the manufacturer's specifications and model numbers of all tower, antenna, and ancillary equipment (e.g., batteries, equipment in cabinets, GPS, and antennae) on all development plans;
- iii. construct and maintain the site in compliance with the approved plans and photo-simulations; and
- iv. provide photos to the Planning Division to verify that the facility is constructed as approved.

Documentation: The Permittee shall provide plans, photo simulations, and a materials sample/color board to the Planning Division for review and approval. Prior to final inspection of the communication facility, the Permittee shall provide photographs demonstrating that the Permittee constructed the facility in compliance with the approved plans, photo simulations, and materials sample/color board.

Timing: Prior to the issuance of a Zoning Clearance for construction, the Permittee shall provide the colors and materials of all buildings and structures on building plans for the Planning Division's review and approval. Prior to the issuance of a Zoning Clearance for construction, the Permittee shall provide the materials sample/color board that illustrates the proposed colors for the Planning Division's review and approval. Prior to final inspection, the Permittee shall construct and paint the structures according to the approved plans.

Monitoring and Reporting: The Planning Division maintains copies of the approved plans, photo simulations, and materials sample/color board in the Project file. The Permittee shall provide photos of the constructed facility to the Planning Division, or schedule a site inspection with the Planning Division, to verify that the Permittee constructed and painted the facility according to the approved plans, photo simulations, and materials sample/color board. The Planning Division maintains the Permittee's approved plans, photo simulations, materials sample/color board, and (if submitted in lieu of a site inspection) photo documentation in the Project file. The Planning Division has the authority to ensure ongoing compliance with this condition pursuant to the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Note: This condition has been satisfied and would only apply to future development of the site if proposed.

20. Removal of Facility upon Abandonment of Use or Expiration of Permit

Purpose: In compliance with § 8111-2.8 and § 8111-8.1 of the Ventura County Non-Coastal Zoning Ordinance and in order to ensure that the use of the subject property remains compatible with existing and potential uses of other property within the general area, the communication facility shall be removed if this CUP expires or if the facility is abandoned.

Requirement: Upon the expiration of this CUP, or abandonment of the use of the communication facility, the Permittee shall:

- a. notify the County that the Permittee has discontinued the use of the facility;
- b. remove the facility and all appurtenant structures; and
- c. restore the premises to the conditions existing prior to the issuance of the CUP, to the extent feasible as determined by the Planning Director.

In the event that the Permittee fails to perform the required actions, the Property Owner shall be responsible for compliance with the requirements set forth in this condition. The facility shall be considered to be abandoned if it has not been in use for 12 continuous months.

Documentation: The Permittee shall provide photos of the site after restoration is completed, to the County Planning Division.

Timing: The Permittee shall complete the notification, removal, and restoration activities within 60 days of the expiration of this CUP, or abandonment of the use, unless the Planning Director grants (in writing) additional time.

Monitoring and Reporting: The Planning Division has the authority to conduct periodic site inspections to ensure compliance with this condition consistent with the requirements of § 8114-3 of the Ventura County Non-Coastal Zoning Ordinance.

Environmental Health Division (EHD) Conditions

21. Hazardous Materials/Waste Management (CUPA Permit Required)

Purpose: To comply with the California Code of Regulations Title 22, Division 4.5, California Health and Safety Code chapter 6.95; and Ventura County Ordinance Code, and to ensure the safe storage, handling, and disposal of any potentially hazardous material and/or waste.

Requirement: The Permittee shall submit a Hazardous Materials Business Plan (HMBP) to the Environmental Health Division/Certified Unified Program Agency (Ventura CUPA) for storage of hazardous materials above reporting thresholds (200 cubic feet gas, 55 gallons liquid, 500 pounds solid). If hazardous wastes are generated, an EPA ID number issued by the California Department of Toxic Substances Control must be obtained and maintained in active status. Wastes identified as "non-hazardous" may require waste determination analysis to confirm if wastes are listed hazardous wastes, exhibits a hazardous characteristic through testing, or application of general knowledge.

Documentation: A completed HMBP must be submitted to the Ventura CUPA electronically through the California Environmental Reporting System (CERS). Maintain all records of hazardous waste determination testing and disposal and make available for review by this Ventura CUPA staff upon request.

Timing: HMBP must be submitted through CERS annually, and whenever there is a change to the type, quantity, or location of the hazardous materials. EPA ID number must be renewed annually.

Monitoring and Reporting: Verification of hazardous materials inventory as well as ongoing compliance with requirements shall be accomplished through field inspection by Ventura CUPA staff. Additional information on the storage and handling requirements for hazardous materials and wastes may be found on the Ventura County Environmental Health Division/Certified Unified Program Agency website: <https://vcrma.org/cupa>

OTHER VENTURA COUNTY AGENCIES

Ventura County Fire Protection District (VCFPD) Conditions

22. Hazard Abatement

Purpose: To ensure compliance with Ventura County Fire Protection District Ordinance.

Requirement: The Permittee shall have all grass or brush adjacent to structure's footprint cleared for a distance of 100 feet or to the property line if less than 100 feet. Note: A Notice to Abate Fire Hazard may be recorded against the parcel.

Documentation: A signed copy of the Ventura County Fire Protection District's Form #610A "Requirement for Construction" or the "Notice to Abate" issued under the Fire District's Fire Hazard Reduction Program.

Timing: The Permittee shall remove all grass and brush as outlined by the Ventura County Fire Protection District's Fire Hazard Reduction Program guidelines before the start of construction on any structure.

Monitoring and Reporting: The VCFPD shall conduct on-site inspections to ensure compliance with this condition.

23. Fire Code Permits

Purpose: To comply with the requirements of the Ventura County Fire Code.

Requirement: The Permittee shall obtain all applicable Fire Code permits.

Documentation: A signed copy of the Fire Code permit(s).

Timing: The Permittee shall submit a Fire Code permit application along with required documentation/plans to the VCFPD for approval before final occupancy, installation and/or use of any item/system requiring a Fire Code permit.

Monitoring and Reporting: A copy of the approved Fire Code permits shall be kept on file with the VCFPD. The VCFPD shall conduct a final inspection to ensure that the requirements of the Fire Code permit are installed according to the approved plans. Unless a modification is approved by the VCFPD, the Permittee, and their successors in interest, shall maintain the conditions of the Fire Code permit for the life of the development.

Note: This condition has been satisfied and would only apply to future development of the site if proposed.



Hall Mtn CS – Height Justification Information for Crown Castle Case No. LU11-0008

Southern California Edison Company (SCE) operates a 900 MHz facility on Hall Mountain to provide Radio Frequency (RF) communications to a number of surrounding areas in Ventura County. The RF communications provide dispatch services and communications essential for the safety of SCE field crews, allowing them to effectively provide reliable electric service to our customers. This site is needed to provide RF coverage for SCE personnel operating in a large portion of Western Ventura County. Any reduction in height could significantly diminish critical radio coverage for emergency personnel operating inland well outside of the City of Ventura, where the steep topography of the nearby hills creates significant radio coverage challenges. In particular, this site extends up Highway 33, past Casitas, as far away as Ojai, east beyond Santa Paula, and south into Oxnard. It is for the very same reason, that Ventura County Emergency Services departments have similar antennas atop the adjacent +175' lattice tower painted navigational orange and white so that their emergency communications can be maintained with its employees throughout the same area.

The RF system requires that adequate isolation exists between the transmit and receive antennas so that the signal being transmitted does not over drive the filters of the receive antennas. This isolation is typically achieved by vertical separation of the antennas along the tower structure. Since there is more power available to the base station than the mobile radio, the transmit antennas are typically located below the receive antennas on the tower. This practice allows maximum coverage, by allowing those mobiles on the far edge of the propagation footprint to have a better chance for near line of sight back to the tower, as their power is limited to the battery in the radio.

Prior to the antenna installation, RF engineering, coverage studies, and field testing were performed to determine that the existing 80' tower would be adequate to provide the required RF coverage and the needed heights for separation between the transmit and receive antennas. The omni-directional antenna located at the top of the tower is the receive antenna and was placed at that location to keep it as clear as possible of the tower structure. This placement provides the best "ear" for hearing those distant mobiles. At the same time, the multiple omni-directional antennae located approximately ¾ up the tower were placed there to maximize the coverage, while still maintaining the needed separation and limiting the interference caused by transmitting into areas that are covered by other sites, or where coverage is not needed (ocean).

In conclusion, the **existing** height of SCE's receive antenna at 80' continues to be required to achieve our radio objectives; otherwise, the effectiveness of our communications system is compromised in an area where cellular coverage is already spotty. To lose such connectivity (due a lower antenna height) with our techs in the field, where they already do not have adequate cellular coverage or in the event of a significant event where the cellular systems are further compromised, will negatively impact our ability to provide emergency response and timely restoration of electrical service in this portion of Ventura County.

Jeremy Marotte
Telecommunications / RF Engineer
Southern California Edison
Office: 626-543-8716.