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CITY OF CULVER CITY

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October 28, 2017

Jennifer Carney
T-Mobile West, LLC
3257 E. Guasti Road, Ste. 200
Ontario, CA 91761

**SUBJECT: Wireless Telecommunications Facility Permit Application
(T-Mobile Site # LA33664E)**

NOTICE OF INCOMPLETENESS

Dear Ms. Carney:

This letter is in response to the Wireless Telecommunication Facility Permit (WTFP) Application submitted to the City of Culver City on September 29, 2017, on T-Mobile's behalf, by Synergy Engineering Systems.

The city referred the above-referenced permit application to Kapstone, planning consultants, and asked Kapstone to provide a screencheck review. Kapstone recently provided that screencheck (contained in the 12-page enclosure to this letter) to the city.

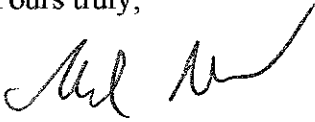
The city requires the submission of a completed WTFP Application. The application submitted on behalf of T-Mobile is not complete, as further outlined in the attached enclosures. Many of the applicable boxes of this application were left unchecked. Please be sure to check all applicable boxes upon resubmittal.

Also, please note that this application was submitted to the city via email. The city requires that these applications be submitted in-person. (See "Introduction" to the Application, Paragraph c.)

This letter and the enclosed screencheck review by Kapstone will serve as the city's Notice of Incompleteness pursuant to the Federal Communication Commission's shot clock rules.

As you can see, T-Mobile's application is largely incomplete. Further, the proposed installation is inconsistent with the city's aesthetic standards. As such, the city recommends scheduling a meeting with city staff prior to any resubmittal of application documents.

Yours truly,

A handwritten signature in black ink, appearing to read 'Roland Miranda', with a stylized flourish at the end.

Roland Miranda
Deputy City Attorney

Enc.

cc: Sammy Romo, Public Works Department
Cody Blandino, Synergy (via email cblandino@synergy.cc)

KAPSTONE

October 24, 2017

Sammy Romo
Senior Civil Engineer
City of Culver City
Public Works Department
9770 Culver Boulevard
Culver City, CA 90232

**Subject: First Screencheck Comments - Wireless Telecommunication Facility
Permit T-Mobile Site #LA33664E; W/O 10876 Culver Blvd**

Dear Mr. Romo,

Kapstone has completed its first screencheck review of the proposed Wireless Telecommunication Facility Permit for T-Mobile Site #LA33664E located west of 10876 Culver Boulevard in Culver City. The site is located in the parkway on the west side of Culver Boulevard, north of Elenda Street and south of Coombs Avenue. The proposal includes the placement of three antennas concealed inside a radome to be installed on a 40-foot slimline pole in the public right of way. Ground mounted equipment will include an equipment cabinet and power meter pedestal also installed in the public right of way.

The project application has been deemed **INCOMPLETE** pending submittal of missing information. Please note that the application is substantially incomplete, and this is reflected back to the applicant in the detailed comments outlined in Attachment 1. Also, please be aware that additional comments may be forthcoming pending an analysis of missing information once it has been provided for review.

If you have any questions regarding the screencheck comments, please feel free to contact me at katie@kapstone.com or (949) 825-7028.

Sincerely,

Katie Berg-Curtis
Senior Planner

Attachments:

1. Screencheck Comments
2. Redlined Plans

Mr. Sammy Romo
October 24, 2017
Page 2

C: Trevor Lottes
Calvin Mingione

**ATTACHMENT 1
FIRST SCREENCHECK COMMENTS
WIRELESS TELECOMMUNICATION FACILITY PERMIT
T-MOBILE SITE #LA33664E – W/O 10876 CULVER BLVD**

COMPLETENESS

The application has been deemed **INCOMPLETE** pending the submittal of the following items:

1. *Complete Application.* Respond to all questions and provide all supporting documentation requested in the Wireless Telecommunications Facility Permit Application. See detailed comments below for all missing items/information that are required with your next submittal. Staff will re-evaluate the completeness of the application with the following screencheck review.
2. *Technical Studies.* Provide a noise study demonstrating the proposed project complies with the noise standards identified in the Culver City Municipal Code as identified in Section IX of the application.
3. *Height.* The proposed wireless facility is proposed to be a height of 40 feet; however, per Section 17.400.110.D.2.a.ii of the Culver City Municipal Code, the height shall be restricted to the maximum height allowed in the Zoning District. The height limit in the Residential Zero Setback Overlay Zone is 30 feet. Modify the facility to a maximum height of 30 feet.

APPLICATION CHECKLIST

Section I

4. Provide the property address, contractor information, and person most knowledgeable details as requested in Section I.a and I.d.iii and I.d.iv of the application.

Section II

5. Provide responses to questions 1, 2 and 3. Provide description and supporting documentation per the instructions and mark each as Exhibit A.

Section III

6. Modify the Exhibit C1 "Project Overview" to include a description of the facility location (including the pole and cabinet equipment location in relation to the sidewalk, existing structures, and vegetation), the construction activities involved, and the maintenance requirements and schedule for the facility. Describe the amount of landscaping that will be removed and how landscaping will be replaced and used to screen the ground equipment.
7. Provide responses to questions 2, 3, and 4.

8. Provide a response to question 5. Additionally, revise Exhibit C2 to address subpoints a, b, and c requiring a justification study. The submitted document provides a general description of T-Mobile's service and purported benefits of increased coverage. However, it fails to provide the required justification since it lacks the details demonstrating a gap in coverage, the rationale for a public right-of-way installation at the specific proposed location, and a description of how the facility represents the least intrusive means. The City's position is that the proposed new pole is intrusive on the surrounding neighborhood. A nearby light pole that is screened by trees is a preferred location. Revise accordingly.
9. Provide the geographic and propagation maps required by item number 6. Mark as Exhibit C3.
10. Modify Exhibit C4 to provide a description of the land uses within the geographic area and how the proposed facility will serve residents in those areas.

Section IV

11. Per Section IV.1.c., clarify that this is a new pole and not an existing facility. The application and plans indicate it is a new pole in certain instances and an existing facility in other instances. If this is a new pole, provide a new pole justification analysis to demonstrate why existing infrastructure such as a nearby street light pole cannot be utilized and how the new pole is the least intrusive means possible. The City's position is that the nearby street light pole would provide a less intrusive means. Label this analysis as Exhibit D1c.
12. No information was provided related to Section IV.3. Clarify that this section is not applicable to the project. Provide Exhibits D3a and D3b if applicable.
13. No information was provided related to Section IV.4. Clarify whether the applicant is willing to share facilities. Provide Exhibit D4 if the applicant is willing to share facilities.
14. Per Section IV.5, clarify if the project will utilize directional boring to minimize disruption to the sidewalk. Provide clarification and explanation as Exhibit D5.

Section V

15. Complete the check box in Section V.2.

Section VI

16. Per Section VI.1, provide details on the engineering plans which include:
 - a. Evidence and other pertinent factors governing selection of the proposed design, together with evidence that demonstrates that the proposed facility has been designed to the minimum height and diameter required from a technological standpoint for the proposed site. Mark as Exhibit F1.
 - b. Provide conduit manufacturer. Mark as Exhibit F2.
 - c. Provide a photograph and model name and number of each piece of equipment included. Mark as Exhibit F3.
 - d. Provide power output and operating frequency for the proposed antenna. Mark as Exhibit F4.

- e. Provide the total anticipated capacity of the structure, indicating the number and types of antennas and power and frequency ranges, which can be accommodated. Mark as Exhibit F5.
- f. Provide structural calculations demonstrating the structural integrity of the proposed facility. Mark as Exhibit F6.
- g. Provide a wind velocity test. Mark as Exhibit F7.
- h. Provide a seismic analysis. Mark as Exhibit F8.

Section VII

17. Provide a site plan marked as Exhibit H1a that includes:
- a. Location and dimensions of the existing facility and maximum height above ground of the facility;
 - b. Benchmarks and data used for elevations
 - c. Location of existing accessways and the location and design for all proposed accessways
 - d. The exact proposed location of the pole, antennas, accessory equipment, and landscaped areas
 - e. Location of existing utilities and adjacent land uses
 - f. Design of the facility, including the specific type of support structure, type, location, size, height, and configuration of applicant's existing and proposed facilities
 - g. If applicable, the method by which an antenna will be attached to the mounting structure
 - h. Location of the overhead plant that will be installed, even if it is not subject to this application
18. Per Section VII.1.b., provide a Master Plan of all existing and proposed facilities. Mark as Exhibit H1b.
19. Per Section VII.1.c., provide a conceptual Landscape Plan. Mark as Exhibit H1c.
20. Per Section VII.1.d., provide photo simulations of the project and project site. Mark as Exhibit H1d.

Section VIII

21. Complete Section VIII of the application to identify other locations which might be less prominent locations that can be screened from public view with trees. The City recommends identifying a nearby light pole that is screened by trees as a less prominent location. Mark as Exhibits I1 through I3.

Section IX

22. Per Section IX.1., provide a noise study for the proposed site at 10876 Culver Blvd which documents that level of noise to be emitted by the proposed facility will comply with the Culver City Municipal Code. Mark as Exhibit J1.

Section X

23. Provide all other documentation certifying that all applicable licenses or other approvals required by the FCC have been obtained to provide the services proposed in connection with the application. Mark as Exhibit K1.
24. Provide any copies of all documents the applicant is required to file pursuant to the Federal Aviation Administration regulations for the facility. Mark as Exhibit K2.

Section XI

25. Complete the checkbox for question 1. If applicable, provide the information requested in question 2 and label as Exhibit L.

EXHIBIT E – OPTIONAL CHECKLIST FOR DETERMINATION OF WHETHER A FACILITY IS CATEGORICALLY EXCLUDED

Page 2, Evaluation of Categorical Exclusion

26. Provide information to complete questions 18 and 21 in order for the determination to be made if this project qualifies for a Categorical Exclusion.

ENGINEERING PLANS

Sheet T-2

27. Add a note to the plans indicating that the pole and equipment shall be removed, and site returned to original condition if carrier abandons site.

Sheet A-2

28. Label and dimension the sidewalk.
29. Label and dimension the public right of way.
30. Label surrounding buildings and land uses.
31. Show setback dimensions to the nearest residential property in all directions.

Sheet A-3

32. Add a note to the plans specifying the color of the pole. The pole shall be a neutral, non-glossy color.
33. Add a note to the plans indicating that the radome will be painted to match the color of the pole.
34. Add a note to the plans indicating that the equipment cabinet will be painted to match the color of the pole.
35. Add a note to the plans indicating that all cables shall be fully concealed.
36. Add a note to the plans that a sign shall be placed on the equipment cabinet that lists a telephone number to contact in case of emergency.
37. Provide a slimmer radome that is more in scale with the pole.

Sheet D-1

38. Provide detail for radome including height and diameter dimensions

Sheet D-2

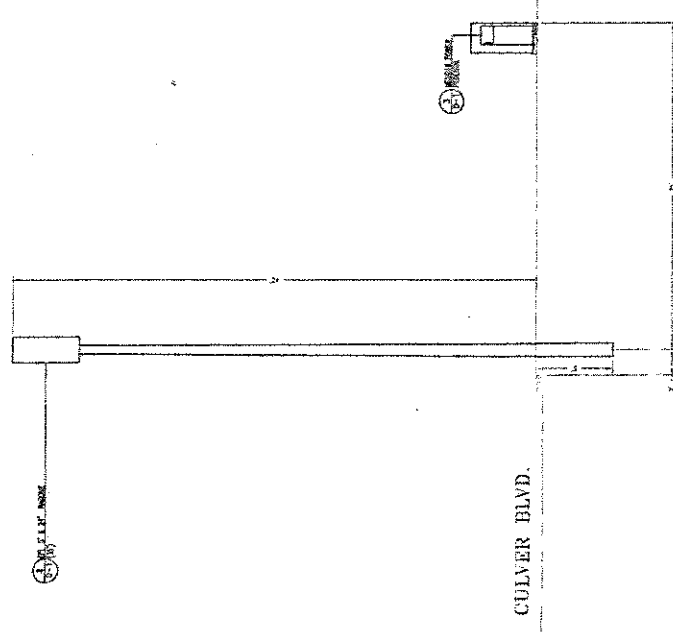
39. Decrease the size of the concrete pad to minimize the impact to the landscaped parkway.
40. Provide landscape screening around ground equipment. Depict landscaping on Sheet D-2.

[illegible][illegible]

040331

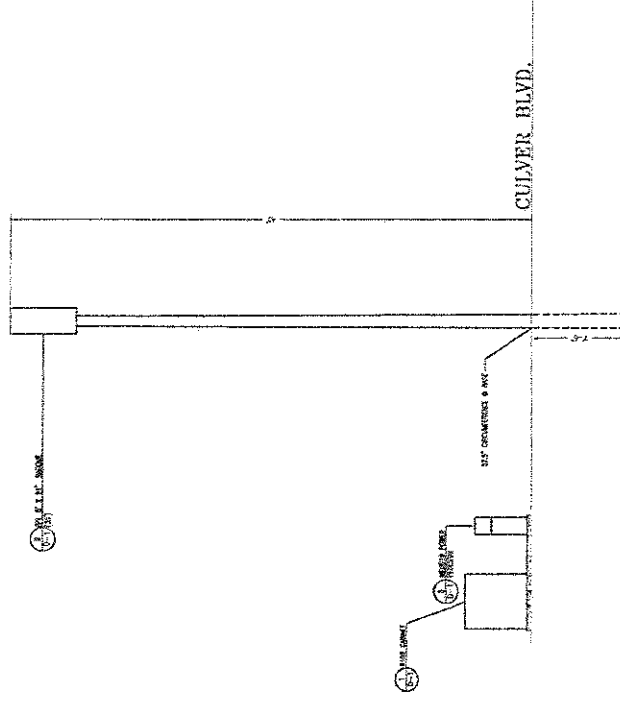
Notes: - Specify color of pole

- Indicate Pole name will be painted to Match pole color
- Indicate Address will be fully connected
- Indicate a sign will be placed on cabinet with phone number for Emergency Contact.



1 | PROPOSED ELEVATION LOOKING: SOUTHWEST

SCALE: 1/4"=1'



2 | PROPOSED ELEVATION LOOKING: NORTHWEST

SCALE: 1/4"=1'

Get more from life



David, Robert, Anthony, Ben, Nicholas, and Matt
Synergy Engineering

DATE: 09-25-17

ENGINEER DATE: 09-25-17

DRAWN BY: M.P.

NO: 1 DATE: 09-25-17

2

3

4

5

6

7

SITE INFORMATION:
LA3366AE
CULVER ROW
ROW MACRO

W/ 11111 11111 11111
STAMP

SHEET TITLE:

SITE
ELEVATION

SHEET NUMBER:
A-3

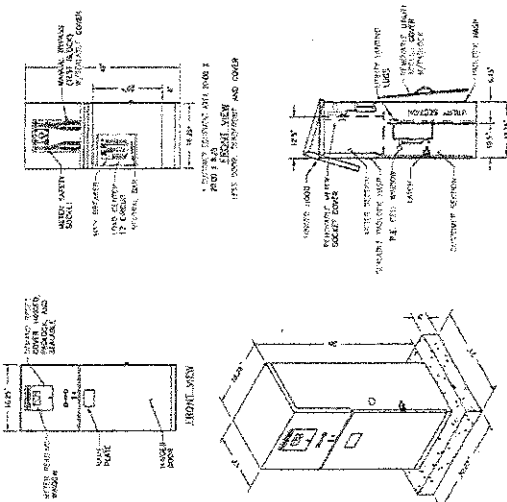
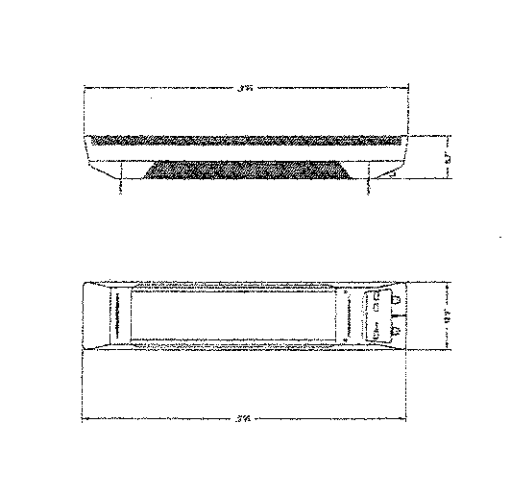
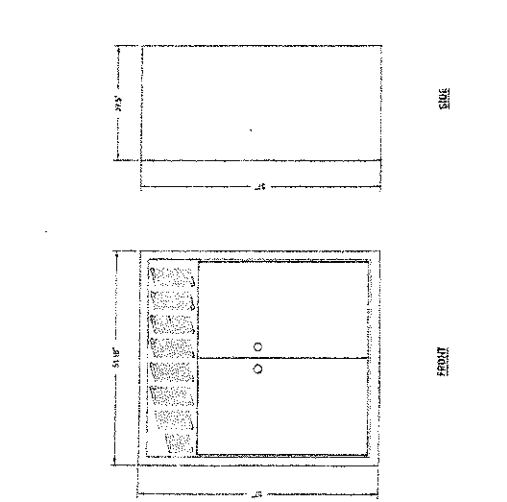
Get more from us
Mobile

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 Development Group, Inc.
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 Denver, CO 80231
 Phone: (303) 750-1000
 Fax: (303) 750-1001
 Email: info@synergygroup.com

DATE: 09-25-17
 ENGINEER DATE: 09-25-17
 DRAWN BY: M.P.
 CHECKED BY: M.P.
 DATE: 09-25-17
 SCALE: N.T.S.

SITE INFORMATION:
LA33664E
CULVER ROW
ROW MACRO
 #20 10000 E. 1st Avenue, Suite 100
 Denver, CO 80231

SHEET TITLE:
EQUIPMENT
DETAIL
 SHEET NUMBER:
D-1

 <p>FRONT VIEW SIDE VIEW REAR VIEW</p>	<p>3 MEUG16 POWER PEDESTAL SCALE: N.T.S.</p>	6
 <p>GENERAL ANTENNA INFO SCALE: N.T.S.</p>	<p>2 GENERAL ANTENNA INFO SCALE: N.T.S.</p>	5
 <p>CABINET DETAIL SCALE: N.T.S.</p>	<p>1 6102 CABINET DETAIL SCALE: N.T.S.</p> <p><i>Provide detail for radome.</i></p>	4

SOURCE: NYS