

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
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 Staff Report: February 21, 2001
 Hearing Date: March 13-16, 2001

REGULAR CALENDAR
STAFF REPORT AND PRELIMINARY RECOMMENDATION

Application No.: 6-00-159

Applicant: AT&T Wireless Services/
 Wireless Facilities Inc.

Agent: Doug Munson

Description: Installation of a 67-foot high monopole with 24 panel antennas (12 four-foot long antennas mounted at the 67-foot level and 12 four-foot long antennas mounted at the 45-foot level); three (3) four-foot long omni antennas mounted at the 67-foot level; and two (2) four-foot diameter microwave dishes mounted at the 57-foot level. The monopole is proposed as a simulated pine tree design (monopine) to blend it with the existing mature trees in the project area. Also proposed is one- (1) BMR antenna mounted to the proposed 516 sq.ft. equipment building located at the base of the pole. A 6-foot tall chain link fence with barbed wire would surround the monopole and the equipment building.

Site: Interstate 5 Northbound Rest Stop, located on the east side of I-5, Camp Pendleton Marine Base, San Diego County.

STAFF NOTES:

Summary of Staff's Preliminary Recommendation: Staff is recommending approval of the proposed communications facility. Adverse impacts to visual resources is the primary issue associated with this project. In this case staff has concluded that potential impacts to the public viewshed along Interstate 5 (I-5) in the Camp Pendleton area have been addressed as designed by the applicant and as required in the attached special conditions. The project will be located on the east side of I-5 so no public view blockage issues arise with respect to ocean views. In addition, the proposed monopole has been designed as a simulated pine tree within an existing group of mature trees and landscaping, thus minimizing its visibility from I-5. Special Conditions require final construction plans, the applicant to agree to co-locate any future antennae at the project site if technologically feasible and submittal of a written agreement to remove the proposed facilities and restore the site to its former condition should technology changes render the facility no longer viable or necessary in the future. With these conditions

potential visual impacts associated with the proposed development will be reduced to the maximum extent feasible.

Substantive File Documents: Certified San Diego County Local Coastal Program (LCP); Coastal Development Permit Nos. 6-97-160, 6-98-74, 6-00-57.

I. PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

MOTION: *I move that the Commission approve Coastal Development Permit No. 6-00-159 pursuant to the staff recommendation.*

STAFF RECOMMENDATION OF APPROVAL:

Staff recommends a **YES** vote. Passage of this motion will result in approval of the permit as conditioned and adoption of the following resolution and findings. The motion passes only by affirmative vote of a majority of the Commissioners present.

RESOLUTION TO APPROVE THE PERMIT:

The Commission hereby approves a coastal development permit for the proposed development and adopts the findings set forth below on grounds that the development as conditioned will be in conformity with the policies of Chapter 3 of the Coastal Act and will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3. Approval of the permit complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the development on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the development on the environment.

II. Standard Conditions.

See attached page.

III. Special Conditions.

The permit is subject to the following conditions:

1. Co-Location of Future Antennae. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall agree in writing to cooperate with other communication companies in co-locating additional antennae and/or equipment on the project site in the future, providing such shared use does not impair the

operation of the approved facility. Upon the Commission's request, the permittee shall provide an independently prepared technical analysis to substantiate the existence of any practical technical prohibitions against the operation of a co-use facility.

2. Future Redesign. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall agree in writing that where future technological advances would allow for reduced visual impacts resulting from the proposed telecommunication facility, the applicant agrees to make those modifications which would reduce the visual impact of the proposed facility. In addition, if in the future the facility is no longer needed, the applicant agrees to abandon the facility and be responsible for removal of all permanent structures, and restoration of the site as needed to re-establish the area consistent with the character of the surrounding vegetation. Before performing any work in response to the requirements of this condition, the applicant shall contact the Executive Director of the California Coastal Commission to determine if an amendment to this coastal development permit is necessary.

3. Final Plans. PRIOR TO THE ISSUANCE OF THE COASTAL DEVELOPMENT PERMIT, the applicant shall submit to the Executive Director for review and written approval, final plans for the proposed monopine facility that have been approved by the Camp Pendleton Marine Base and are in substantial conformance with the site plan prepared by Booth and Suarez Architecture, Commission date stamped received 1/19/2001 submitted with this application.

The permittee shall undertake development in accordance with the approved plans. Any proposed changes to the approved plans shall be reported to the Executive Director. No changes to the plans shall occur without a Coastal Commission approved amendment to this coastal development permit unless the Executive Director determines that no amendment is required.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Project Description. Proposed is the installation of a 67-foot high monopole with 24 panel antennas (12 four-foot long antennas mounted at the 67-foot level and 12 four-foot long antennas mounted at the 45-foot level); three (3) four-foot long omni antennas mounted at the 67-foot level; and two (2) four-foot diameter microwave dishes mounted at the 57-foot level. The monopole is proposed as a simulated pine tree design (monopine) to blend it with the existing mature trees in the project area. In addition, one (1) BMR antenna will be mounted to the proposed 516 sq.ft. equipment building at the base of the pole. A 6-foot tall chain link fence with barbed wire would surround the monopole and the equipment (an area of approximately 1,675 sq.ft.). The site plan reflects the equipment for both the applicant and Nextel Communications; thus, it is a co-location facility. The proposed facility is located on the east side of I-5; therefore, ocean views from I-5 would not be adversely impacted by the proposed development.

The project site is located just east of the Interstate-5 (I-5) northbound rest stop in the Camp Pendleton area of the County of San Diego. The rest stop is located on the top of a low rolling hill which descends in elevation at both the south and immediate north ends. Many eucalyptus trees surround the rest stop. Just outside the rest stop, the facility would be located in an area that is removed from any pedestrian and vehicular activities and would be fenced and screened with additional landscaping.

In August 1998, the Commission approved (CDP #6-97-160, GTE) the installation of an unmanned cellular facility at the I-5 rest stop near the northeast corner (about 200 feet northwest of the proposed project site). The approved project consisted of a 77-foot tall monopole with 24 panel antennas (12 four-foot long antennas mounted at the 77-foot level and 12 four-foot long antennas mounted at the 55-foot level); a 360 sq.ft. equipment building; two 6-foot diameter microwave dish antennas; three 4-foot long omni antennas; and one four-inch GPS antenna that were to be shared by the two applicant. The installation of the approved facility would have required the removal of several existing mature trees. The approved project was not constructed and the permit has subsequently expired.

Because of concerns raised by Camp Pendleton officials, it was determined that any facility at this location needed to be located outside of Caltrans' right-of-way; thus, the project proposes to relocate the facility just outside the northbound rest stop, on Camp Pendleton property, immediately adjacent to the commercial truck parking area at the rear of the rest stop. The facility would be fenced and in an area that is removed from any pedestrian and vehicular activities.

Because there is no certified LCP for this area, the standard of review for this development is Chapter 3 policies of the Coastal Act.

2. Visual Resources. Section 30251 of the Coastal Act is applicable and states, in part:

The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas...

According to the applicant, the project site was chosen as the preferred location to fill a gap in their communication network for the I-5 corridor in the Camp Pendleton area. The project site is visible from I-5 which is a major public access route and is designated in the previously certified San Diego County land use plan as a Scenic Corridor. To reduce the visibility of the proposed facility and to integrate it with the immediate surroundings, the applicant is proposing a simulated pine tree design to blend it with the existing mature trees within and on the perimeter of the rest stop that partially screens views from the portions of I-5 having views of the facility (particularly southbound on I-5, north of the rest stop). Existing vegetation is up to approximately 30-feet high at varying elevations in the vicinity of the rest stop. However, the proposed facility is located on the east side

of I-5; therefore, ocean views from I-5 would not be adversely impacted by the proposed development.

The applicant has submitted a general overview of the considerations involved in siting a wireless facility. When selecting a potential site, four disciplines are involved: radio frequency engineering, site acquisition or leasing, zoning and construction. First, the radio frequency team designs a cell configuration within a given area. Taking into account topography, existing buildings and landscaping, they zero in to a particular design and footprint. This footprint dictates certain areas as optimum for locating a telecommunications facility. According to the applicant, each site is chosen with many specific criteria including height in relationship to desired coverage, adjacent topographical impacts, surrounding structures, surrounding landscape and relationship to adjacent antenna sites. Once this process is complete the leasing agent reviews the area for interested landlords and sites that meet the radio frequency criteria. The first approach is to find an existing carrier and determine if they will entertain a co-location concept. In this case the applicant indicates there are four potential landlords in this area: Caltrans, the railroad, San Diego Gas & Electric (SDG&E) and Camp Pendleton.

According to the applicant, height of the antennas plays a very different role in a digital system than the early analog systems. Historically, high sites with a large area of service were preferred but as the technology and popularity of mobile phones increased the number of sites to handle the capacity increased as well as the desire to cover a smaller area per site. Each site has a finite capacity; the greater area of coverage means the greater potential number of subscriber use, therefore reaching capacity sooner than if the site coverage area were limited to a smaller footprint. Hence, the higher the site, the greater potential to cover a greater area. According to the applicant, the adjacent topography poses a specific impact to the distance a signal will travel and the strength in which it will travel. Hills and mountains can channel a signal or interrupt its potential. The type of groundcover also participates in the ability or inability for a signal to travel with strength. Any surrounding structures can impact the signal and its strength. Buildings tend to reflect the signal in a direction that causes the original signal to misshape or collide with itself thus creating a negative impact on the signal. Buildings also absorb the signal depending upon the exterior material, which causes the signal to lose strength and dissipate.

In addition, surrounding landscape causes problems of its own. Depending on the landscape material and its moisture content the signal can be either absorbed or altered in a negative way. Vertical landscape such as trees or high shrubs cause the greatest impact. According to the applicant, landscaping needs to be maintained at a distance that is conducive to the ability of the signal to propagate. The Pacific Ocean also plays a large role in affecting the quality of the signal (it can distort the signal). Thus, all these factors must be considered when determining a potential site location.

Regarding the proposed project, the applicant states the proposed facility is necessary to improve ATT cellular coverage along I-5 from Camp Pendleton to the border checkpoint near San Onofre. Current regional service is provided by existing facilities located at the border checkpoint near San Onofre and at the Benedictine Monastery located along the

northern border of the City of Oceanside. While current service is provided, it is inadequate and results in "dropped calls". The project is being proposed to correct this problem. As noted, this site would also colocate services operated by the Nextel Company. The location of the project site would complement the existing Nextel facilities: the "Las Flores" site located on the base, the "W.Mission" site in northwest Oceanside off Mission Avenue, and the "Oceanside" site located south in the northernmost part of Oceanside. Additionally, according to the applicant, the base is currently considering a north Nextel facility link near the Border Checkpoint. Other than the marine base, according to the applicant there are no existing co-locatable installations with other carriers within the needed area to be serviced. The Commission notes that this is a co-located site which is typically preferred and encouraged as colocation reduces the number of carrier sites and their corresponding visual impacts.

With respect to siting the facility, CalTrans would not lease area in their right of way unless access is provided from a source outside of the right-of-way. There is no such access existing in this area at this time. The applicant indicates the railroad right-of-way would have been acceptable except the railroad could not provide access easements to the power lines that could only be accessed across Camp Pendleton property. SDG&E expressed no desire to enter into a lease indicating it has generally become an intrusion into their ability to maintain their lines. According to the applicant, Camp Pendleton became the only viable solution. The military facility's environmental review section required the project take existing views and aesthetics into consideration.

As noted, the site would be visible from several locations along the I-5 corridor. A discussion of alternative locations is provided below.

I-5 Southbound Rest Stop. The applicant examined the rest stop located on the west side of I-5. Three potential locations were considered within the west side rest stop. The final selected location, an area at the far southeast end of the rest stop amongst existing mature pine trees was initially pursued. However, both Camp Pendleton and Commission staff voiced concerns on the potential for significant visual impacts within the I-5 coastal view corridor and the proposal was withdrawn.

Coaster Maintenance Depot. The Coaster Maintenance Depot is located south of the I-5 rest stops. The depot was examined to potentially avoid the need for a monopole through a façade mounted building collocation. The maintenance depot was tested to determine if it could meet the necessary coverage objectives. This location did not meet the coverage objectives for the area since it is not tall enough to provide the necessary link with the existing facility at San Onofre, which is a critical element of the proposed facility. Therefore, the maintenance depot location was not determined to be a feasible alternative.

I-5 Northbound Rest Stop. The I-5 Northbound Rest Stop is located on the east side of I-5, immediately south of the west side rest stop. The rest stop is located on the top of a low rolling hill and descends in elevation at both the south and

immediate north ends. As noted, GTE received approval from the Coastal Commission in 1998 (CDP #6-97-160) to construct a 77-foot tall monopole within the northeastern corner of the Caltrans easement. However, subsequent to the Commission's approval, Camp Pendleton determined that it was illegal for Caltrans to lease space to GTE and therefore construction of the approved project was not possible.

The applicant maintains that the need for expanded coverage and service relief capacity for this area is even greater than it was in 1998 when the previous coastal development permit was granted. Given the surrounding topography and the lack of any structures of adequate height to meet the necessary coverage objectives, the applicant states a monopole structure represents the only possible alternative to provide the necessary service enhancements.

The applicant indicates finding an appropriate site in this area proved difficult. Normally, the search rings designed for proposed facility locations are determined with a degree of flexibility. However, along the I-5 corridor the terrain greatly reduces that flexibility. Additionally, the lack of existing structures in this area that might provide a site location lessens the flexibility.

Also, the project site's relationship to the existing designed sites north and south of it was a consideration in the decision to select the site (i.e., there are existing sites that the proposed site must interact with). As noted, the location of the project site coincides with other existing AT&T and Nextel facilities. If the rest stop site were moved north, it would cause an additional site to be required to the south.

Additionally, the applicant states that if this site were not approved, Nextel would be forced to locate at least two, possibly more, sites as substitution for the same coverage. Because of the nature of the terrain, the replacement projects would have pole height requirements of at least 50' to provide for the necessary rad centers for the microwave dishes, which must be placed due to lack of telco landline service in the area. The Fresnell Zone is the space above the existing terrain that must be avoided in setting microwave signals because of the characteristics of atmospheric conditions from the earth to a certain height above the earth. In addition to that prescribing a minimum elevation for the microwave dishes, the transmitting and receiving antennas would have to be placed at a height to accommodate the distance to its neighbor sites and allow for the variable terrain. Therefore, the result would likely be more sites (not including any additional sites required by AT&T's relocation), at elevations not much lower than the proposed site. Nextel and AT&T are able to locate on this site at this elevation because it is a high terrain spot, and the dish elevation can be shared by both users.

In addition, the proposed facility would provide cellular coverage for military personnel at Camp Pendleton. Camp Pendleton has land use constraints associated with the I-5 corridor due to flight paths, ordnance zones and training operations (i.e., restricted from relocating south, due to the radar testing that is conducted at the facility located on the west side of the freeway, which would interfere with the signal).

Additionally, the project site has existing electrical power and access in place. As such there will be minimal environmental impact to the adjacent area. The applicant states that other sites are not served by power or are heavily covered in coastal sage scrub. The subject site is proposed in an existing disturbed area. There would be no impact to the surrounding coastal sage habitat at the project site.

Moreover, the applicant contends the site is necessary for public safety as it provides coverage to not only the I-5 traffic, but to emergency services which are contracted by the Federal government to respond to emergencies not on the base, but located within base jurisdiction. The FCC mandates that coverage be continuous within a network plan.

Regarding visual impact concerns, the project site is the best site along this portion of the I-5 corridor because it has existing mature landscaping in the form of numerous eucalyptus trees that will provide a buffer for the equipment building as well as the simulated pine tree. While the proposed simulated pine tree will be visible from the freeway, the existing mature landscape will soften the vertical line caused by the simulated tree. The applicant notes that the Commission previously approved a Coastal Development Permit for a 10' higher pole, closer to the freeway. It was approved in this location as a result of the design being relocated from the southbound, west side of the freeway, because the west side was considered the preferred "view corridor" and the east side was less sensitive, due to the fact that 1) it is further removed from the ocean view, 2) there are numerous SDG&E high-tension transmission towers, and other base elements that intrude a vertical impact on the landscape, and 3) it is near the truck stop/commercially used portion of the rest stop, as opposed to the park/snack/restroom areas utilized by tourist traffic. The Nextel/ATT location is within an area that has already been designated for public use, i.e. the rest stop.

The Commission found that the previously approved project would have limited visibility from the surrounding region, including views from I-5, given the presence of existing mature landscaping to the north, west and southwest across the rest stop. The monopole is designed as a simulated pine tree (monopine) and will blend in better with the surrounding environment because the rest stop is landscaped with mature trees. Surrounding countryside is populated by low-growing and environmentally sensitive coastal sage. The introduction of a pole or tree in surrounding areas away from the rest stop would have greater potential for visual impacts as it would not be screened by existing vegetation.

According to the applicant, the proposed 200-foot shift in the location of the proposed facility would not alter the visibility of the facility from I-5 with one exception. The proposed project would not require removal of three existing mature trees on the northern corner of the rest stop as was the case with the previously approved project. According to the applicant the retention of the trees will increase the landscape screening of the facility from I-5 southbound and reduce its visibility compared to the previously approved project. The proposed project reduces the height of the previously approved monopole

from 77 feet to 67 feet; however, given the difference in the ground elevation, the top of the monopole maintains the same effective height as the approved project.

The applicant concludes that the alternatives analysis has resulted in a proposed location that avoids the potential for significant visual impacts. By moving the proposed facility from the northeastern corner of I-5 northbound rest stop approximately 200 feet to the southeast, proposing a pine tree design to blend in with the existing mature landscaping and by placing the facility among existing mature landscaping, aesthetic impacts on the coastal view corridor have been addressed.

Based on the above described alternatives analysis, the Commission finds that the proposed project site is the least environmentally damaging location. While the monopole will be partially visible from I-5, the project site will meet the goals of the applicant while minimizing impacts on visual resources. Additionally, as designed as a simulated pine tree amongst many other trees at the rest stop, the project's visual appearance will be minimized. Special Condition #3 requires final plans that indicate the proposed monopole will be designed as a simulated pine tree. Therefore, the Commission finds the project to be consistent with Chapter 3 policies of the Coastal Act with respect to preserving visual resources.

While the proposed facility will not have significant adverse impacts on the visual quality of the area, the Commission is concerned that cumulatively, installation of additional similar projects in the area could have adverse impacts on visual resources. As demand for wireless communication facilities increases, it is likely that other service providers will be interested in placing additional structures, antennae and equipment in the project area, and the Commission is concerned that cumulatively, installation of additional similar projects in the area could have adverse impacts on visual resources. As such, Special Conditions #1 and #2 have been attached. Special Condition #1 requires that the applicant submit a written statement agreeing to cooperate with other communication facilities in co-locating additional antenna on the proposed development, unless the applicant can demonstrate a substantial technical conflict to doing so. Special Condition #2 requires the applicant to submit a written statement agreeing to remove the structures and restore this site in the future should technological advances make this facility obsolete. In this way, it can be assured that the proliferation of these types of facilities can be limited to appropriate locations, and that the area will not be littered with outdated and obsolete facilities in the future.

In summary, while the proposed facility will extend 67-feet high, it will not result in public view blockage, will only be partially visible from I-5 and has been designed as a simulated pine tree within an group of mature trees and landscaping. Therefore, the Commission finds that as conditioned, impacts to scenic coastal resources have been reduced to the maximum extent feasible, consistent with Section 30251 of the Coastal Act.

3. Local Coastal Planning. Section 30604 (a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted

development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made.

The subject site is located on the Camp Pendleton Marine Base, a federally owned and operated military facility used by the United States Marine Corps and located in an unincorporated area of the County of San Diego which is not subject to local permit review by the County. In addition, although the project is subject to the Commission's Federal Consistency Review Process, the Commission's act of granting a coastal development permit to the applicant functions under the California Coastal Management Program as the equivalent of a concurrence under the Coastal Zone Management Act. Because there is no certified LCP for this area, the standard of review for this development is Chapter 3 policies of the Coastal Act. Based on the above discussion, the Commission finds that the proposed development, as conditioned, is consistent with all applicable Chapter 3 policies of the Coastal Act and no adverse impacts to coastal resources are anticipated.

4. California Environmental Quality Act (CEQA). Section 13096 of the California Code of Regulations requires Commission approval of a coastal development permit to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(A) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse effect which the activity may have on the environment.

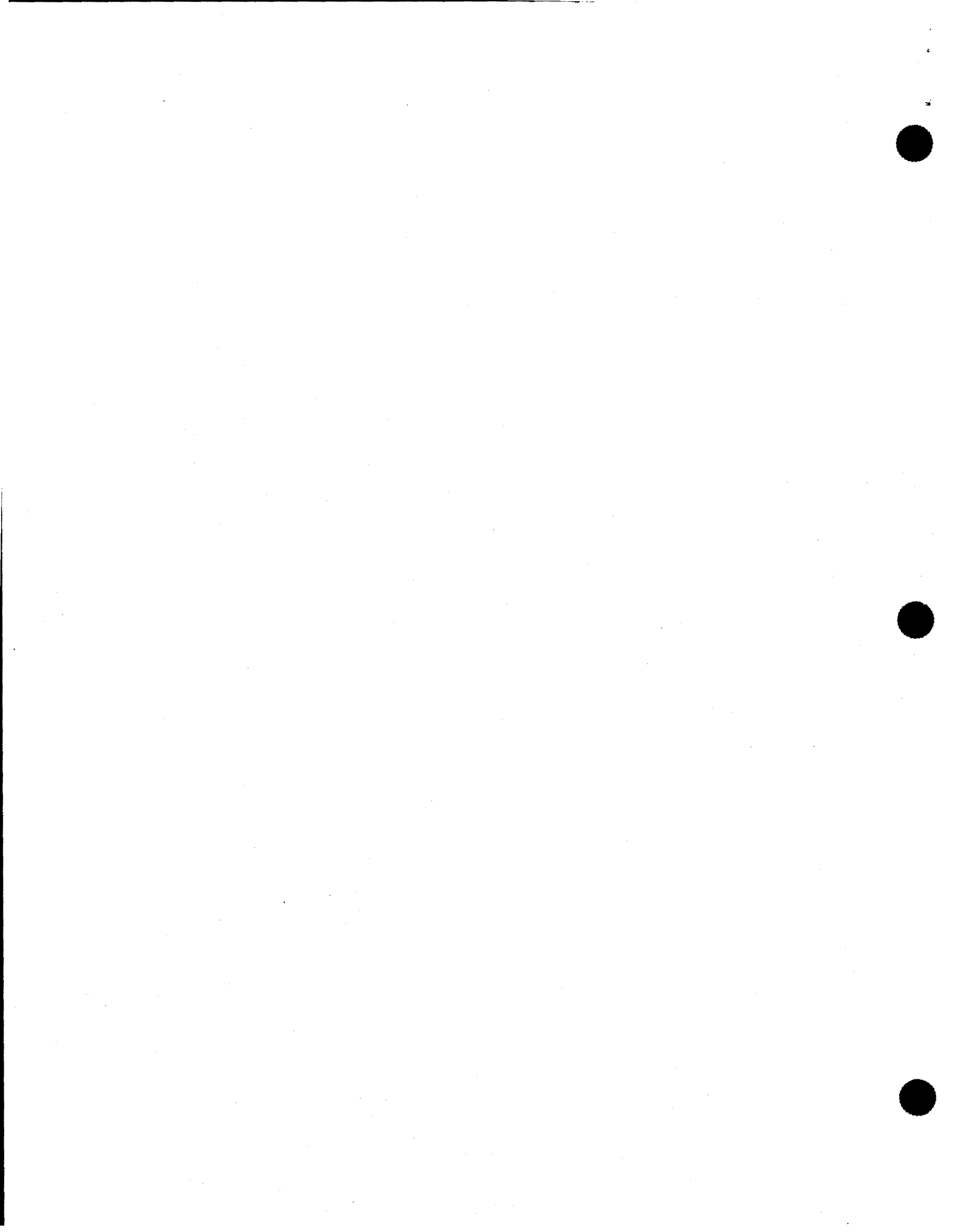
As discussed herein, the proposed project, as conditioned, will not cause significant adverse impacts to the environment. There are no feasible alternatives or mitigation measures available which would substantially lessen any significant adverse impact which the proposed activity may have on the environment. Therefore, the Commission finds the proposed project, as conditioned, is the least environmentally damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

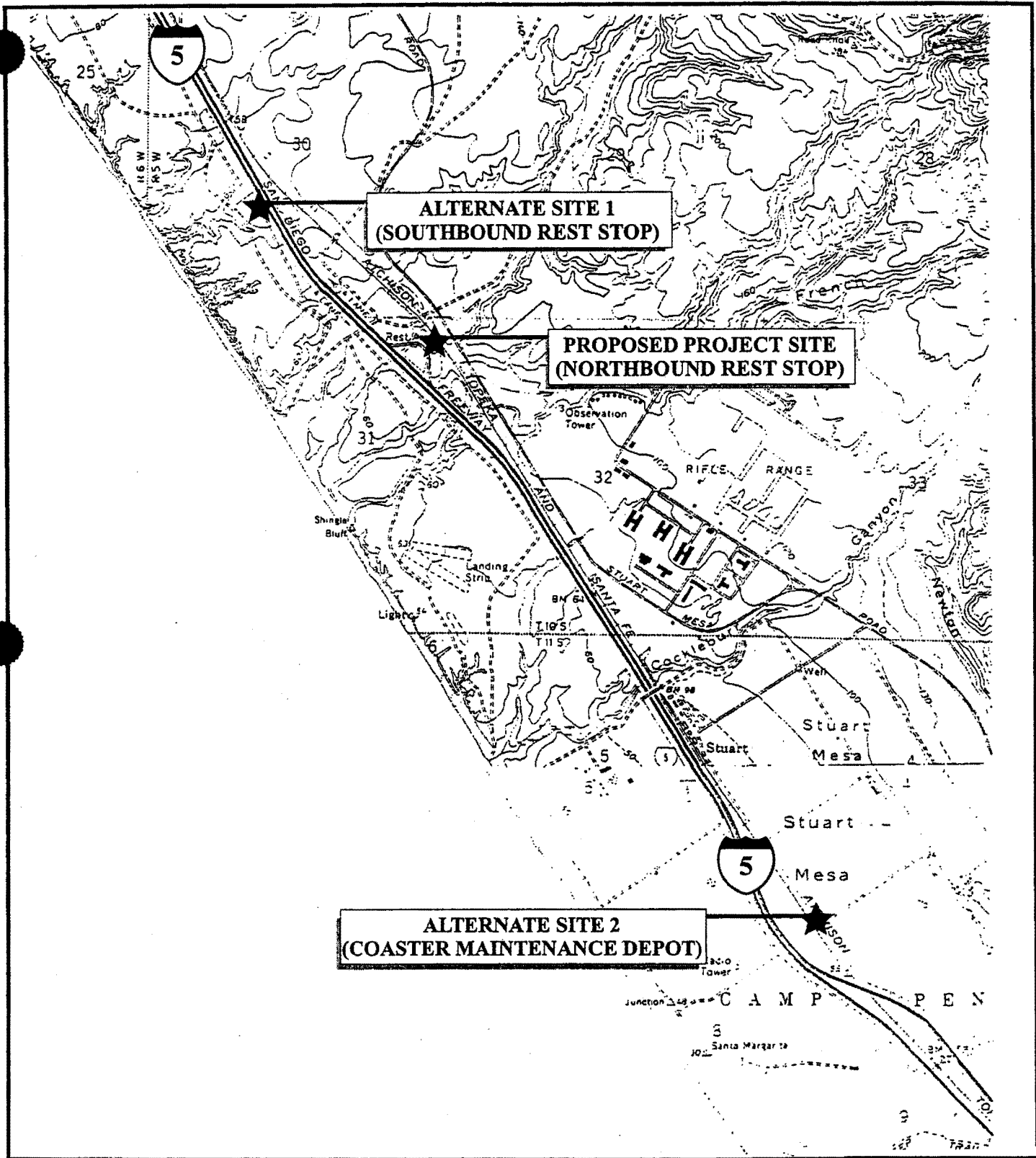
STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgment. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.

3. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
4. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.
5. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

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**ALTERNATE SITE 1
(SOUTHBOUND REST STOP)**

**PROPOSED PROJECT SITE
(NORTHBOUND REST STOP)**

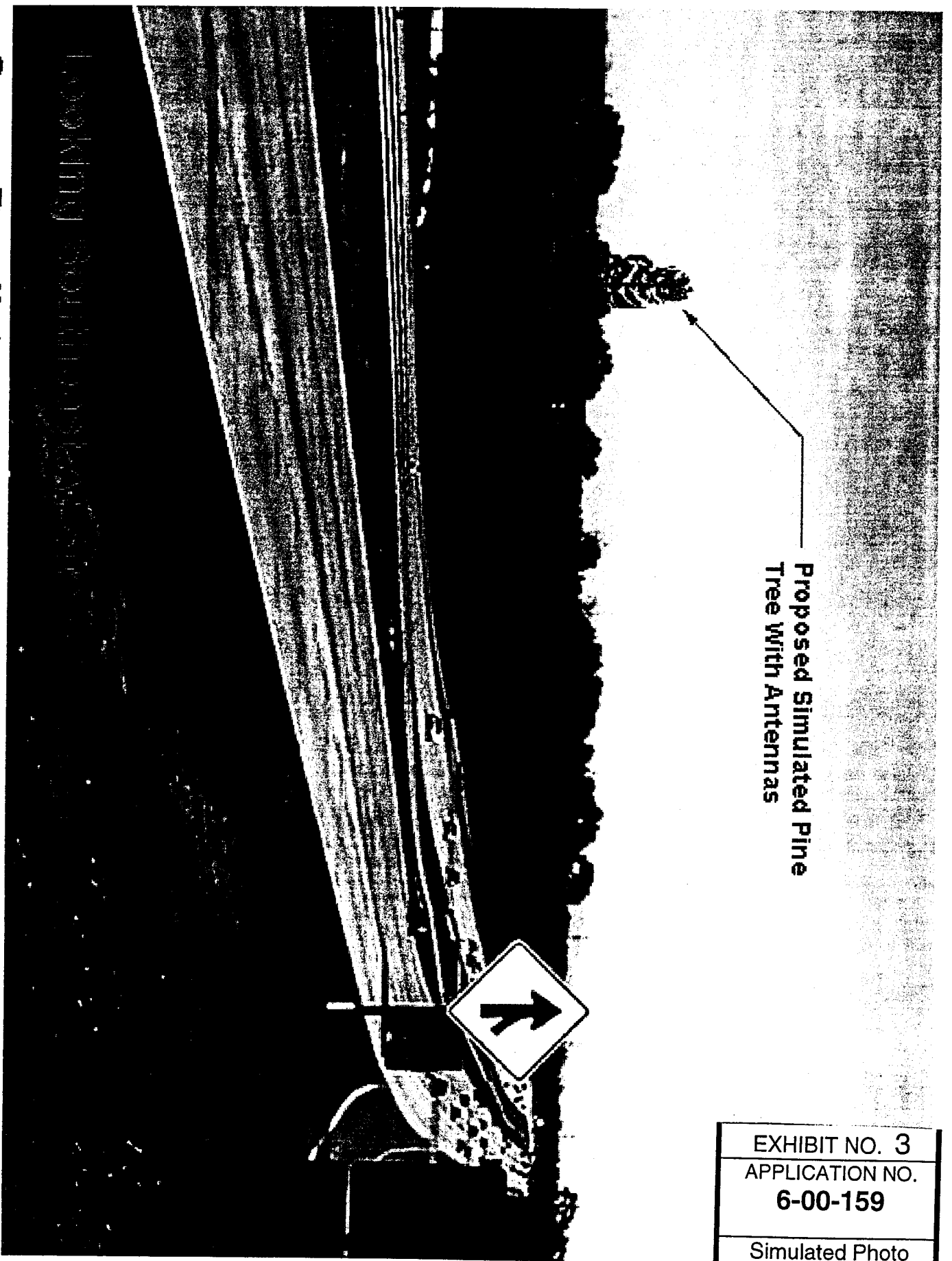
**ALTERNATE SITE 2
(COASTER MAINTENANCE DEPOT)**

EXHIBIT NO. 1
APPLICATION NO.
6-00-159
Location

Source: U.S.G.S 7.5 Minute Series Map, Las Pulgas Canyon Quadrangle

Proposed Simulated Pine
Tree With Antennas

EXHIBIT NO. 3
APPLICATION NO.
6-00-159
Simulated Photo

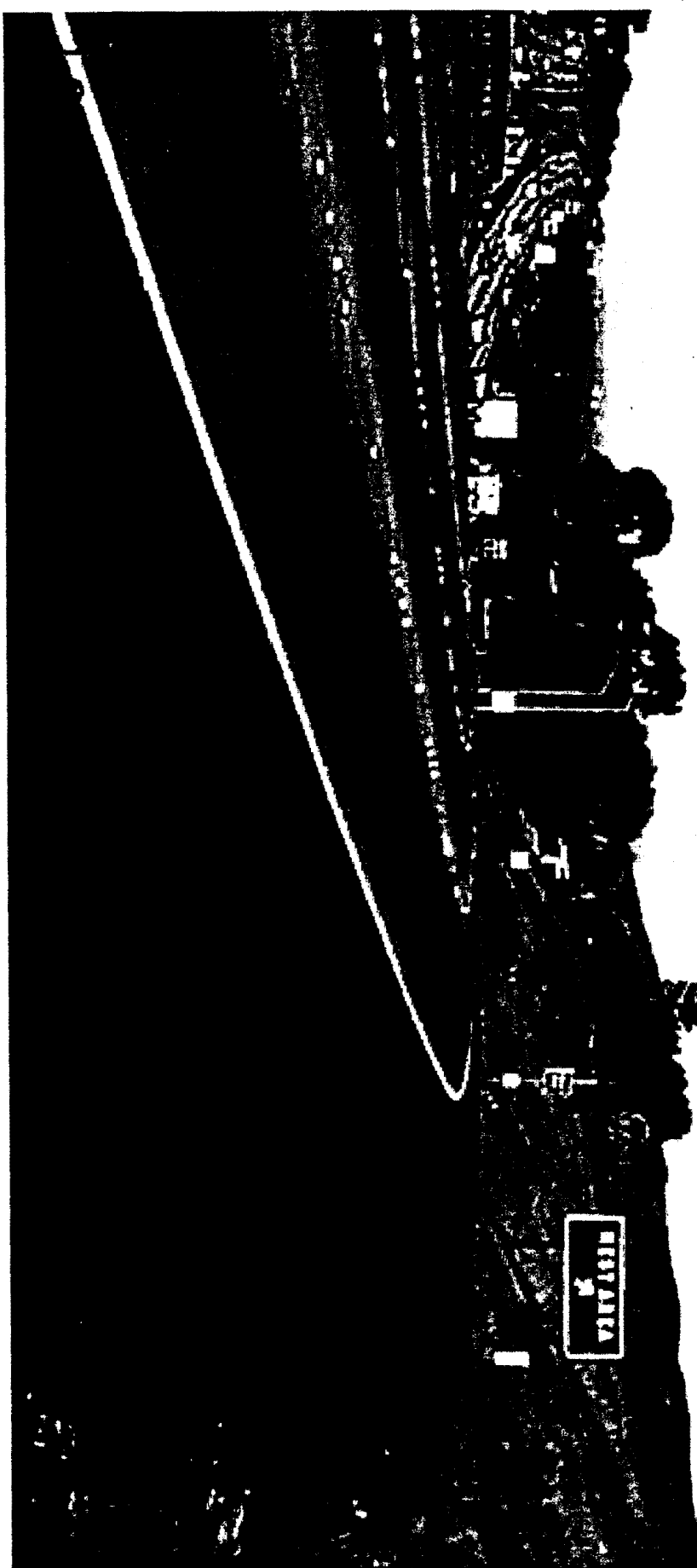


Looking South on Highway 101

Camp Pendleton I-5 Rest Stop

Proposed Simulated Pine
Tree With Antennas

EXHIBIT NO. 4
APPLICATION NO.
A-6-OCN-99-133
Simulated Photo
California Coastal Commission



Camp Pendleton Interstate 5 Rest Stop