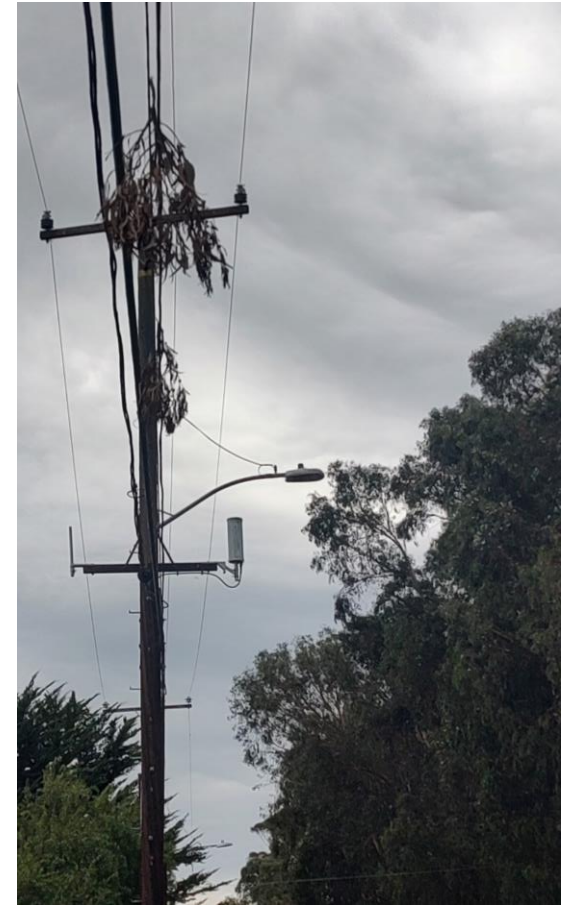


## WE WANT VERIZON TO CHOOSE A LESS INTRUSIVE ALTERNATIVE LOCATION

1. **The least intrusive location:** A location that is at least a street distance away from a residential property line.
2. **Very small lots:** Legally nonconforming due to their small size, in our community.
3. **Substantially visible and clustered:** These facilities clutter our neighborhood with eyesores
4. **Inaccurate information in Verizon's studies of alternate locations:** Lack of sufficient justification as to why several viable locations are not "less intrusive."
5. **Questioning the need for enhanced services/conflicting info from Verizon:** Who is the target audience? No dropped calls in our community. Is it cell service or home internet service that Verizon wants to enhance?

# WE WANT VERIZON TO CHOOSE A LESS INTRUSIVE ALTERNATIVE LOCATION

6. **4+ years of community opposition:** to locations that are directly adjacent to our residential property lines and windows
7. **Lack of restrictions:** telecom ordinance in the County of Santa Barbara should look to what other cities and counties are doing and support the voices of the communities who want these further away from our very small property parcels.
8. **Decrease in property values:** numerous studies have evidence that cell towers reduce property values in nearby homes. Local governments are well within their power to impose setback requirements and many cities and counties have.
9. **Fire hazard concerns:** Verizon said if a facility was 5-10 feet near the eucalyptus trees, it would be a fire hazard. There is a tree 5-10 feet away from the current proposed pole. Eucalyptus branches fall on the wire and utility poles all the time. Students often throw shoes and articles of clothing on utility lines and poles.



## Community opposition to proposed location

- Community has been organizing for over 4 years against locations that are directly adjacent to our small residential lots on west end of IV.
- This location at 6897 Trigo Road was the original location and was previously rejected.
- A location adjacent to a residential vacant lot on Camino Lindo was rejected
- Planners encouraged Verizon to apply at the original location.
- The community feels dismissed and beaten down by Verizon and planning staff.

## The term “less intrusive”

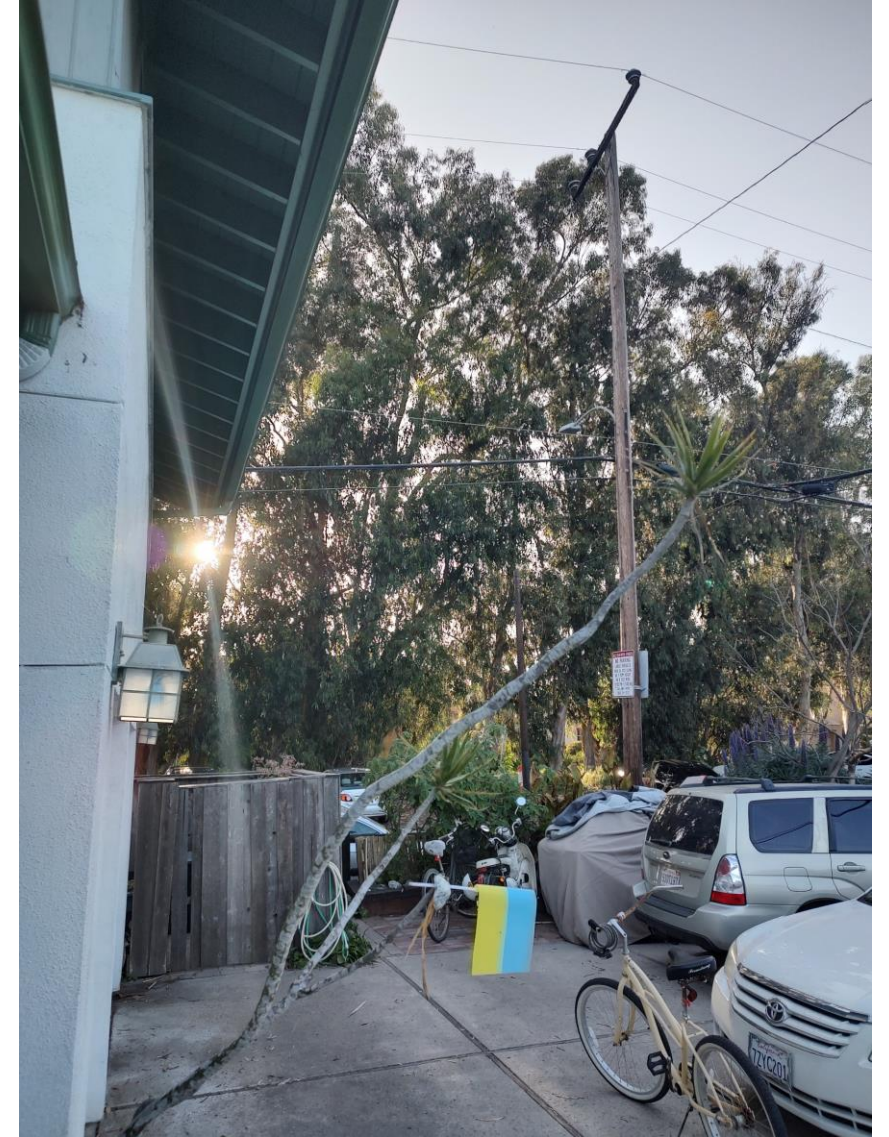
- **“This could not be considered a less intrusive alternative”:** Used throughout Verizon’s reports on alternative locations as justification why the current proposed location is the only choice and the alternatives are not an option.
- **No legal definition:** The term “less intrusive” is not a legally defined term. There is no definition of this in any ordinance, policy or code. The term is **subjective and open to interpretation**.
- **Not accurate that proposed location is the “least intrusive”:** This statement is not proven by any legal factuality. There are numerous inaccuracies and lack of sufficient justifications in Verizon’s reports.
- **The least intrusive location:** The majority of our communities prefers ANY location that is at least a street distance away from a residential property line. Our lots are too small and right next to a property line means it is “substantially visible” when looking out a window. There are several viable locations of which several are included in Verizon’s report on alternative location.
- **Locations #4, 10, 11, 12, 13, 14:** Long term residents consider these and other locations by the eucalyptus trees or on UCSB owned land to be “less intrusive” to our community.



# Current proposed location is “more intrusive” than several alternative locations in Verizon’s reports

Master bedroom at eye level to proposed 5g cell facility

Occupant has stage 4 cancer and has been on dialysis for over 10 years  
– compromised immune system





## VIOLATION OF ARTICLE II SECTION 35-144F.D.3.c

**“A facility that is substantially visible from a public viewing area shall not be installed closer than two miles from another substantially visible facility.”**

This is the current existing wireless facility on Pasado Road, 250 feet from current proposed. This is substantially visible.



## VIOLATION OF ARTICLE II SECTION 35-144F.D.3.c

**“A facility that is substantially visible from a public viewing area shall not be installed closer than two miles from another substantially visible facility.”**

This is the current existing wireless facility on Camino Majorca, 135 feet from current proposed. This is substantially visible.



## VIOLATION OF ARTICLE II SECTION 35-144F.D.3.c

**“A facility that is substantially visible from a public viewing area shall not be installed closer than two miles from another substantially visible facility.”**

- **Clustered development:** There are two other wireless facilities within 250 feet of the current proposed location. One is half a block away and the other a block away.
- **Substantially visible:** Not only is this substantially visible from the public view but the facility will be substantially visible from Erickson’s bedroom windows.



## VIOLATION OF COASTAL PLAN POLICY 4-4

**“New structures shall be in conformance with the scale and character of the existing community.”**

This is a beach town single family home community. The proposed location is in between a several preserves, parks and open space, the beach, and a blufftop trail to a reserve and access to the largest protected marine area in our region.

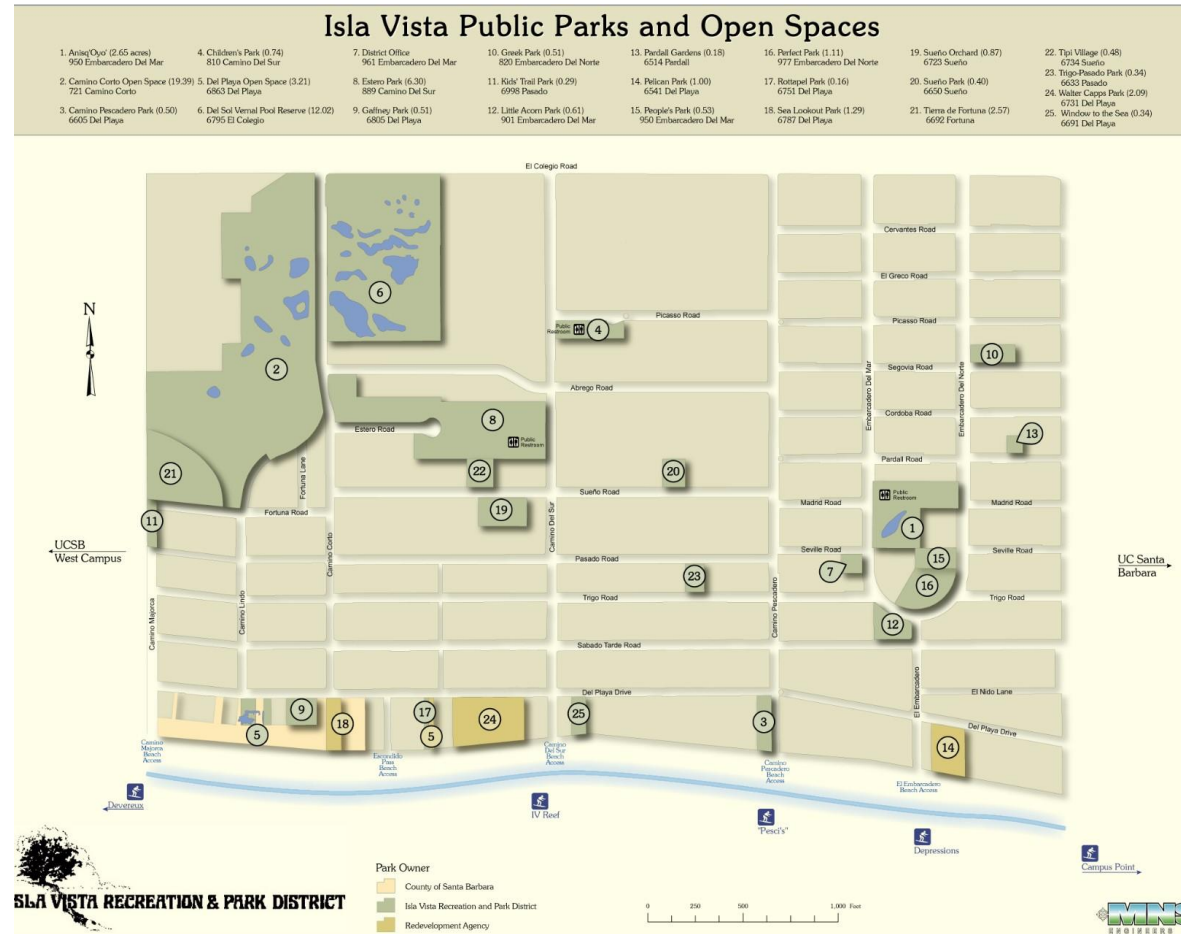
Clustering these eyesores in our community takes away from the natural beauty of the community.



# VIOLATION OF COASTAL PLAN POLICY 4-4

**“New structures shall be in conformance with the scale and character of the existing community.”**

Proposed location is located 2 blocks from Tierra de Fortuna Park, Kids Trail Park and Camino Corto Open Space. The location is 3 blocks from Del Playa Open Space, Gaffney Park, and Sea Lookout Park. The parks feature beautiful views of ocean, mountains and trees, vine-covered gazebo, picnic tables, play options for kids, volleyball court, . The open spaces encompass 28+ acres with restored native plants, vernal pools, and nature trails.

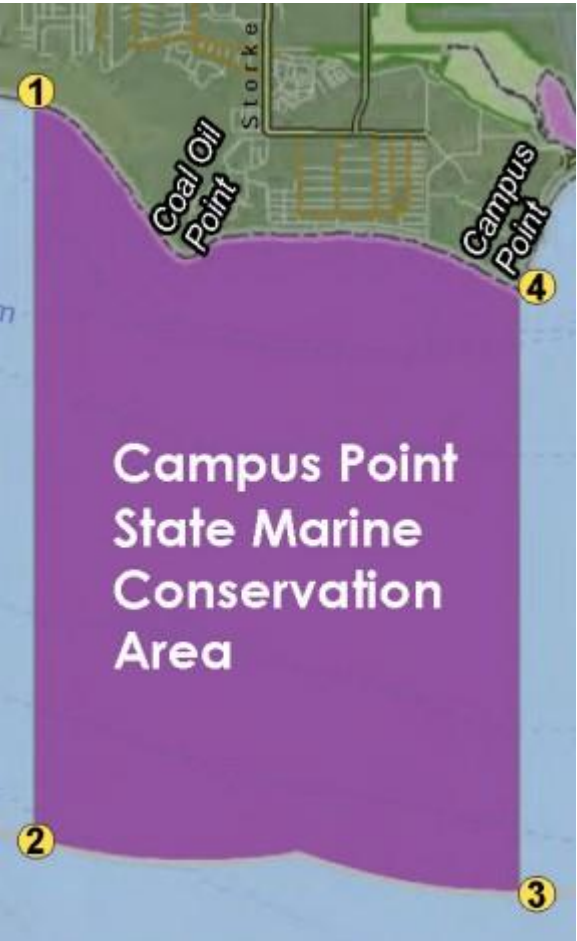




# VIOLATION OF COASTAL PLAN POLICY 4-4

“New structures shall be in conformance with the scale and character of the existing community.”

Proposed location is located 2 blocks to Camino Majorca beach, the blufftops and the Campus Point State Marine Conservation Area.





## VIOLETION OF COASTAL PLAN POLICY 4-4

**“New structures shall be in conformance with the scale and character of the existing community.”**

Proposed location is 2 blocks from the path to Coal Oil Point Reserve which is less than ½ mile walking distance

Coal Oil Point Reserve protects one mile of coastal and estuarine habitats and adjacent wetlands. Devereux Slough is in the heart of the reserve.



## Inaccuracies in the reports prepared by Verizon and planners – Abuse of discretion

- **Locations #12, 13 and 14** state a replacement pole would be required between 41 and 44 feet high.
  - This is not a sufficient reason to reject these locations.
  - A 44 foot replacement pole is required at the current proposed location.
  - No matter what location is chosen, a replacement pole of similar height will be needed.
- **Location #11** has not been discussed with IVRPD.
  - Verizon stated that IVRPD declined this location, but this is not accurate. This location has not been presented to IVRPD and there is no back up documentation evidencing otherwise.
  - Location #9 was declined by IVRPD because it is in the middle of a cul-de-sac street directly adjacent to a basketball court, but that is irrelevant to Location #11.
- **Location #11** already has utility equipment on it.
  - This is not a sufficient reason to reject this location.
  - Code dictates that a small cell must be mounted on an existing utility pole or similar structure.
  - Removing and reinstalling other utilities is feasible
- **Location #4** has “dense foliage” and is a fire hazard.
  - The foliage is not very dense as they are eucalyptus trees.
  - The trees could be trimmed back.
  - There is another pole down the street by the eucalyptus trees that has more clearance.
  - One of the eucalyptus trees fell on a car recently, so the community supports pruning and maintaining these trees to avoid this in the future.

## Inaccuracies in the reports on alternative locations prepared by Verizon – Abuse of discretion

- **Unproven “Significant gap” in network service capacity due to “a lack of strong dominant signal.”**
  - This is inaccurate. Several community members have Verizon service. Never any dropped calls.
  - There is reliable Verizon cell reception and signal strength.
    - 3 to 5 bars of 4G along Camino Majorca.
    - 3 to 4 bars of both 4G and 5G at UCSB faculty housing.
  - **If an applicant claims that they have a significant gap in a specific area, local planners can demand hard data and ask Verizon to show evidence of dropped calls. Other cities require this.**

### VIOLATION OF ARTICLE II SECTION 35-144F.3.4.a.3 of Coastal Zoning Ordinance

If facility is in a residential zone, then must also find that the area proposed to be served would otherwise not be served by the carrier **(Verizon does serve this area already and will continue to regardless if this facility is installed at this location)**

### VIOLATION OF ARTICLE II SECTION 35-144F.8 of Coastal Zoning Ordinance

**“The Director shall establish and maintain a list of information that must accompany every application for installation of a telecommunications facility...to include: Lists of other nearby telecommunications facilities”**

- I asked the planning staff for a list of other nearby telecommunications facilities and was told they do not track that information and do not have any information they can give me.



## Inaccuracies in the reports on alternative locations prepared by Verizon – Abuse of discretion

- **Errors in staff report, Conditions of Approval and Notice of CEQA exemption – Violation of Article II Section 35-144F.C.2.a and Article II Section 35-144.F.C.2.a (2)**
  - The diameter of the omni-directional canister antenna is stated to be 14 feet 6 inches long which would protrude from the pole towards Erickson’s bedroom window. This is in the staff report, the CEQA exemption notice and the Conditions of Approval.
  - **Antennas shall not protrude more than two feet horizontally. Antenna shall be no more than one cubic feet in volume.**
  - CEQA exemption notice states exemptions for “limited numbers of new, small facilities”. This is now the third small facility in less than 250 feet. What is the definition of “limited”?
- **Biased favorable treatment by planners toward Verizon**
  - Planners encouraging Verizon to apply at the proposed location despite it being previously rejected and community opposition
  - Planners inaccurately stating the proposed location is the ONLY location that is THE least intrusive
  - Planners in their approval report inaccurately state the alternative site analysis justifies why alternative locations are infeasible.
  - Planners allowing Verizon to submit a request for continuance so they can strengthen their case and make sure they have attorneys present. Planners denied Erickson’s request to postpone the meeting despite the request being made a month in advance. Verizon’s request was just 3 days before the meeting.

## Questioning the need for enhanced services on west end of Isla Vista

- Multiple residents on the west end of Isla Vista are Verizon customers and do not have any dropped call or issues with cellular services. There are 3 to 4 bars of 4G on Camino Majorca and 3-4 bars of 5g on UCSB Campus Point Faculty Housing.
- It was mentioned on the site tour with Verizon that UCSB faculty are the primary target customers. Why isn't Verizon in discussions with UCSB to obtain a license agreement?
- A UCSB real estate attorney indicated there are multiple viable locations on UCSB land that could be used for a facility. Verizon and UCSB already have a negotiated template for license agreements because they have a long standing relationship of working together.
- 4 years ago, Verizon told the community the purpose of this facility would be for enhanced cell service, primarily for the residents at west campus faculty housing. At the last planning commission meeting, a Verizon engineer said it would be for wireless internet. Why did it take 4 years to inform the community of accurate purpose of this facility?

# Verizon should choose one of the several viable alternative locations that are less intrusive to our community

Options at UCSB faculty housing

Existing pole by eucalyptus trees





# Verizon should choose one of the several viable alternative locations that are less intrusive to our community

Fortuna Road options

