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October 19, 2026

Los Angeles City Council
c/o Office of the City Clerk
City Hall, Room 395
Los Angeles, California 90012

Attention: PLUM Committee

Dear Honorable Members:

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) APPEAL OF CASE NO. ENV-2024-6025-CE-1A; COUNCIL FILE No. 26-1415.

The subject property is a sloping, irregularly shaped approximately 21,810 square-foot of parcel of land with 102 feet frontage on the west side of Argyle Avenue and Holly Mont Drive. The subject property is a sloping, irregularly shaped approximately 21,810 square-foot parcel of land with 102-feet frontage on the west side of Argyle Avenue and Holly Mont Drive. The subject property is located within the Hollywood Community Plan, which designates the property for Medium Residential land uses corresponding to the R3 Zone. The property is zoned R3-1XL, which is consistent with site's land use designation. The property is currently improved with a five-story, 54-foot-tall apartment building built in 1988.

The applicant, AT&T Mobility, proposes the removal of a portion of the existing rooftop solar panel structures and solar panels within an 816 (32-feet by 25.5-feet) square-feet of leasing area, for the installation of a new unmanned Wireless Telecommunications Facility (WTF) that includes three sectors with 9 panel antennas, 14 remote radio units (RRUs), one surge suppressor, one power plant cabinet, one data cabinet, one battery cabinet, one TELCO box, and one electrical panel all located within the 816 square-foot leasing area on the rooftop of the existing apartment building. The project also involves the installation of a new generator connector and MTS disconnect switch at grade level and a meter bank on the P3 level. As proposed, the applicant requests a Class 2 Conditional Use application to permit the installation a rooftop WTF with a maximum height of 54-feet on the 5-story apartment building.

At its meeting of August 11, 2026, the Central Area Planning Commission denied an appeal and sustained Associate Zoning Administrator's approval of the proposed project:

1. **Determined**, based on the whole of the administrative record as supported by the justification prepared and found in the environmental case file, the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15303, Class 3 (New Construction or Conversion of Small Structures), and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the CEQA Guidelines regarding cumulative impacts, significant effects, or unusual circumstances, scenic highways, hazardous waste sites, or historical resources applies;

2. **Denied** the appeal and sustained the Zoning Administrator's Determination dated June 9, 2026;

3. **Approved**, pursuant to Chapter 1 Section 12.24 W.49 and Chapter 1A Section 13B.2.2, of the Los Angeles Municipal Code, a Conditional Use to permit the installation, use, and maintenance of a new unmanned Wireless Telecommunications Facility on the rooftop of an existing residential building in the R3-1XL Zone, with a height of 54 feet in lieu of the height limit of 30 fee required by Height District No. 1XL;

4. **Adopted** the Conditions of Approval (imposed by the Associate Zoning Administrator);

5. **Adopted** the Findings (made by the Associate Zoning Administrator).

Subsequently, on September 17, 2026, a CEQA appeal was filed by an aggrieved abutting neighboring property owner/resident to the City Council (Case Number ENV-2024-6025-CE-1A; Council File Number 26-1415) challenging the Central Area Planning Commission's determination of a Class 3 Categorical Exemptions as the project's environmental clearance.

APPEAL SUMMARY

The appellant contends that the property is located within a hillside and a Very High Fire Severity Zone and Special Grading area, and therefore the project does not qualify for a Class 3 CEQA Categorical Exemptions and requires additional environmental review due to unusual circumstance.

APPEAL ANALYSIS

The subject property is a sloping, irregularly shaped approximately 21,810 square-foot of parcel of land with 102 feet frontage on the west side of Argyle Avenue and Holly Mont Drive. The subject property is a sloping, irregularly shaped approximately 21,810 square-foot parcel of land with 102-feet frontage on the west side of Argyle Avenue and Holly Mont Drive. The subject property is located within the Hollywood Community Plan and zoned R3-1XL. The property is currently improved with a five-story, 54-foot-tall apartment building built in 1988. The applicant, AT&T Mobility, proposes the removal of several rooftop solar panels and structures within an 816 square-feet of leasing area, for the installation of a new unmanned Wireless Telecommunications Facility that includes three sectors with 9 panel antennas, 14 remote radio units (RRUs), one surge suppressor, one power plant cabinet, one data cabinet, one battery cabinet, one TELCO box, and one electrical panel on the rooftop of the apartment building. A new generator connector and MTS disconnect switch at grade level and a meter bank on the P3 level.

On June 9, 2026, the Zoning Administrator issued an approval determination to the project permitting a Conditional Use to permit the installation, use, and maintenance of a new unmanned Wireless Telecommunications Facility on the rooftop of an existing residential building in the R3-1XL Zone, with a height of 54 feet in lieu of the height limit of 30 feet required by Height District No. 1XL.

On June 15, 2026, one appeal was filed to the Central Area Planning Commission objecting to the City's determination. The appellant has made a list of claims against project's close adjacency to her property, view impact, size of the project, and inappropriate Class 3 CEQA Exemption for environmental clearance due to unusual circumstance.

On August 11, 2026, at the Central Area Planning Commission, the Commission heard and considered the appellant's justifications and voted to deny the appeal and sustained the Zoning Administrator's decision.

Subsequently, the appellant filed a CEQA appeal to the to the City Council on September 17, 2026. The Appellant continues to raise similar claims against project's environmental clearance and generally argues that the project does not qualify for a Class 3 Categorical Exemption based on the project location is situated on a hillside and in a fire zone. Thus, it is an unusual circumstance, and that Class 3 Categorical Exemption is inappropriate and requires further study.

The Planning Staff response is that CEQA's "unusual circumstance" exception has erroneously applied and argued by the appellant. There is nothing unusual for the project location on the hillside and in the fire zone. The project is a rooftop equipment installation on an existing apartment building. Project impacts on Hillside locations involve grading, export and import of earth, retaining walls, potential slope disturbance, tree removal, and water drainage. This project is installation of rooftop wireless equipment, there is no grading work, construction of a building, tree removal, or any work to disturb ground. Secondly, regulation related to fire zone focus on projects located on properties fronting on substandard and narrow streets where Fire and life safety access is inadequate. Again, the project is a rooftop wireless telecommunication facility installation, no new construction of a building is a part of the project, and this section of Argyle Avenue is improved to a 45-foot paved roadway. Therefore, Argyle Avenue is fully improved to serve Fire Department fire engine and ambulance vehicles.

Further, Class 3 CEQA exemption is appropriate for the project. Based on the whole of the administrative record, that the Project is exempt from the CEQA pursuant to CEQA Guidelines, Section 15303, Class 3 (New Construction or Conversion of Small Structures), and there is no substantial evidence demonstrating that any exceptions contained in Section 15300.2 of the State CEQA Guidelines regarding location, cumulative impacts, significant effects or unusual circumstances, scenic highways, or hazardous waste sites, or historical resources applies:

(a) Location: The project site does not contain an officially mapped environmental resource of hazardous or critical concern.
(b) Cumulative Impact: There are no concurrent approved or pending projects or haul routes within the same place of the project site. The proposed Project will not result in significant cumulative impacts from successive projects of the same type in the same place.
(c) Significant Effect: The project site is located in a typical urbanized area of the Hollywood Community Plan. The project will not have a significant effect on the environment due to unusual circumstances. All adjacent lots are developed with commercial, institutional, and residential buildings, and the subject site is of similar size and slope to nearby properties.

(d) Scenic Highways: The project is not in the vicinity of a state scenic highway and will not damage scenic resources on a state scenic highway.
(e) Hazardous Waste Sites: The project site is not on a list compiled pursuant to Government Code Section 65962.5 related to hazardous waste sites.
(f) Historical Resources: The project site is not identified as a historical resource, and it will not cause a substantial adverse change in the significance of a historical resource.

Therefore, none of the exceptions in CEQA Guidelines Section 15300.2 to the categorical exemption(s) apply to the Project; no unusual circumstance is found.

In conclusion, the intent of the proposed facility is to enhance wireless telecommunication services in and around the immediate vicinity in order to address the significant gap in service coverage and capacity, as further shown on the propagation map. The facility will provide capacity relief to current sites that are currently overloaded within the Hollywood area. The installation and operation of the wireless facility will offer improved communications for Local, State, and Federal emergency service providers, such as police, fire, paramedics, and other first responders. The project will contribute to the City's Emergency Response objective of the Safety Element of the Los Angeles City General Plan. Lastly, the local government is barred from considering, regulating or denying a wireless facility conditional use permit based on the health or environmental effects of radio frequency emissions, provided that the facility complies with Federal Communications Commission safety guidelines pursuant to Section 704 of the Telecommunications Act of 1996.

RECOMMENDATION

Staff recommend that the PLUM Committee recommend for City Council to deny the appeal; sustain the Central Area Planning Commission's approval of the project; and adopt the CEQA Guidelines, Section 15303, Class 3, Categorical Exemptions as the project's environmental clearance.

Sincerely,

VINCENT P. BERTONI, AICP
Director of Planning

Jack Chiang
Associate Zoning Administrator