

Application Number PWRW48749-8  
Hearing Date October 18, 2022

To: Long Beach City Council

From: Patricia A Hahn

Date: October 12, 2022

Please consider the following comments at the Hearing on October 18, 2022:

1) Application Number PWRW48749-8 should be denied because the Environmental Review is defective. This project does not qualify for a categorical exclusion per Section 15302 of the California Environmental Quality Guidelines.

The guidelines cited in the Notice of Public Hearing are as follows:

**15302. REPLACEMENT OR RECONSTRUCTION**

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to:

- (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.
- (b) Replacement of a commercial structure with a new structure of substantially the same size, purpose, and capacity.
- (c) Replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity.
- (d) Conversion of overhead electric utility distribution system facilities to underground including connection to existing overhead electric

utility distribution lines where the surface is restored to the condition existing prior to the undergrounding.

The construction of a taller tower or an extension to the existing tower is not a “replacement or reconstruction of existing structure” as described in Section 15302 and does not fit into any of the listed activities in subsections (a) through (d). In fact, it would not only be taller in height but would be a new type of installation, i.e. a transmitter and receiver for telecommunications.

2) The City of Long Beach has failed to take into account the claim by plaintiff Hahn that she has a medically-recognized disability and will be harmed by the City’s action were it to approve application Number PWRW48749-8.

Thank you for making these comments part of the record.

Patricia A Hahn