PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE:** July 24,2025
FROM: PLANNING & DEVELOPMENT SERVICES **AGENDA TIME:** 1:30 PM/ No.1

Vertical Bridge Tower

PROJECT TYPE: CUP #25-0004/V #25-0001/ IS #25-0012 SUPERVISOR DIST # 5

LOCATION: 1734 Underwood Rd APN: 045-600-017

Holtville , CA 92250 PARCEL SIZE: 12.10- AC

GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A

ZONE (existing) A-1-U (Limited/(Light Agriculture with an Urban Overlay) ZONE (proposed N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE:

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE:

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 07-24-2025

INITIAL STUDY: #25-0012

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐ NONE	☒ ATTACHED
AG	☐ NONE	☒ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
SHERIFF	☒ NONE	☐ ATTACHED
OTHER		

REQUESTED ACTION:

(See Attached)

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☑ NEGATIVE DECLARATION
☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit #25-0004
Variance #25-0001
Initial Study #25-0012
Vertical Bridge Tower

Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
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July 2025

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #25-0004 (Refer to Exhibit "A" & "B").

B. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS AND THE IMPERIAL COUNTY'S GUIDELINES FOR IMPLEMENTING CEQA

As defined by Section 15063 of the State California Environmental Quality Act (CEQA) Guidelines and Section 7 of the County's "CEQA Regulations Guidelines for the Implementation of CEQA, as amended", an **Initial Study** is prepared primarily to provide the Lead Agency with information to use as the basis for determining whether an Environmental Impact Report (EIR), Negative Declaration, or Mitigated Negative Declaration would be appropriate for providing the necessary environmental documentation and clearance for any proposed project.

☐ According to Section 15065, an **EIR** is deemed appropriate for a particular proposal if the following conditions occur:

- The proposal has the potential to substantially degrade the quality of the environment.
- The proposal has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
- The proposal has possible environmental effects that are individually limited but cumulatively considerable.
- The proposal could cause direct or indirect adverse effects on human beings.

☒ According to Section 15070(a), a **Negative Declaration** is deemed appropriate if the proposal would not result in any significant effect on the environment.

☐ According to Section 15070(b), a **Mitigated Negative Declaration** is deemed appropriate if it is determined that though a proposal could result in a significant effect, mitigation measures are available to reduce these significant effects to insignificant levels.

This Initial Study has determined that the proposed applications will not result in any potentially significant environmental impacts and therefore, a Negative Declaration is deemed as the appropriate document to provide necessary environmental evaluations and clearance as identified hereinafter.

This Initial Study and Negative Declaration are prepared in conformance with the California Environmental Quality Act of 1970, as amended (Public Resources Code, Section 21000 et. seq.); Section 15070 of the State & County of Imperial's Guidelines for Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulations, Title 14, Chapter 3, Section 15000, et. seq.); applicable requirements of the County of Imperial; and the regulations, requirements, and procedures of any other responsible public agency or an agency with jurisdiction by law.

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

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principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

This Initial Study and Negative Declaration are informational documents which are intended to inform County of Imperial decision makers, other responsible or interested agencies, and the general public of potential environmental effects of the proposed applications. The environmental review process has been established to enable public agencies to evaluate environmental consequences and to examine and implement methods of eliminating or reducing any potentially adverse impacts. While CEQA requires that consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including economic and social goals.

The Initial Study and Negative Declaration, prepared for the project will be circulated for a period of 20 days (*30-days if submitted to the State Clearinghouse for a project of area-wide significance*) for public and agency review and comments. At the conclusion, if comments are received, the County Planning & Development Services Department will prepare a document entitled "Responses to Comments" which will be forwarded to any commenting entity and be made part of the record within 10-days of any project consideration.

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

This Initial Study is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed applications.

SECTION 1

I. INTRODUCTION presents an introduction to the entire report. This section discusses the environmental process, scope of environmental review, and incorporation by reference documents.

SECTION 2

II. ENVIRONMENTAL CHECKLIST FORM contains the County's Environmental Checklist Form. The checklist form presents results of the environmental evaluation for the proposed applications and those issue areas that would have either a potentially significant impact, potentially significant unless mitigation incorporated, less than significant impact or no impact.

PROJECT SUMMARY, LOCATION AND EVIRONMENTAL SETTINGS describes the proposed project entitlements and required applications. A description of discretionary approvals and permits required for project implementation is also included. It also identifies the location of the project and a general description of the surrounding environmental settings.

ENVIRONMENTAL ANALYSIS evaluates each response provided in the environmental checklist form. Each response checked in the checklist form is discussed and supported with sufficient data and analysis as necessary. As appropriate, each response discussion describes and identifies specific impacts anticipated with project implementation.

SECTION 3

III. MANDATORY FINDINGS presents Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

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preparation of this Initial Study and Negative Declaration.

V. REFERENCES lists bibliographical materials used in preparation of this document.

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)

E. SCOPE OF ENVIRONMENTAL ANALYSIS

For evaluation of environmental impacts, each question from the Environmental Checklist Form is summarized and responses are provided according to the analysis undertaken as part of the Initial Study. Impacts and effects will be evaluated and quantified, when appropriate. To each question, there are four possible responses, including:

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Potentially Significant Unless Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

This Initial Study and Negative Declaration will be conducted under a ☐ policy-level, ☒ project level analysis. Regarding mitigation measures, it is not the intent of this document to "overlap" or restate conditions of approval that are commonly established for future known projects or the proposed applications. Additionally, those other standard requirements and regulations that any development must comply with, that are outside the County's jurisdiction, are also not considered mitigation measures and therefore, will not be identified in this document.

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

Information, findings, and conclusions contained in this document are based on incorporation by reference of tiered documentation, which are discussed in the following section.

1. Tiered Documents

As permitted in Section 15152(a) of the CEQA Guidelines, information and discussions from other documents can be included into this document. Tiering is defined as follows:

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

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for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

Tiering also allows this document to comply with Section 15152(b) of the CEQA Guidelines, which discourages redundant analyses, as follows:

"Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including the general plans, zoning changes, and development projects. This approach can eliminate repetitive discussion of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration."

Further, Section 15152(d) of the CEQA Guidelines states:

"Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to effects which:

(1) Were not examined as significant effects on the environment in the prior EIR; or

(2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

2. Incorporation By Reference

Incorporation by reference is a procedure for reducing the size of EIRs/MND and is most appropriate for including long, descriptive, or technical materials that provide general background information, but do not contribute directly to the specific analysis of the project itself. This procedure is particularly useful when an EIR or Negative Declaration relies on a broadly-drafted EIR for its evaluation of cumulative impacts of related projects (*Las Virgenes Homeowners Federation v. County of Los Angeles* [1986, 177 Ca.3d 300]). If an EIR or Negative Declaration relies on information from a supporting study that is available to the public, the EIR or Negative Declaration cannot be deemed unsupported by evidence or analysis (*San Francisco Ecology Center v. City and County of San Francisco* [1975, 48 Ca.3d 584, 595]). This document incorporates by reference appropriate information from the "Final Environmental Impact Report and Environmental Assessment for the "County of Imperial General Plan EIR" prepared by Brian F. Mooney Associates in 1993 and updates.

When an EIR or Negative Declaration incorporates a document by reference, the incorporation must comply with Section 15150 of the CEQA Guidelines as follows:

- The incorporated document must be available to the public or be a matter of public record (CEQA Guidelines Section 15150[a]). The General Plan EIR and updates are available, along with this document, at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- This document must be available for inspection by the public at an office of the lead agency (CEQA Guidelines Section 15150[b]). These documents are available at the County of Imperial Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 Ph. (442) 265-1736.

- These documents must summarize the portion of the document being incorporated by reference or briefly

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describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.

- These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.

- The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

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II. Environmental Checklist

1. **Project Title**: Conditional Use Permit #25-0004 & Variance #25-0001
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Luis Bejarano, Planner II, (442)265-1736, ext. 1745
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: luisbejarano@co.imperial.ca.us
6. **Project location**: 1734 Underwood Rd, Holtville, CA 92250, Assessor's Parcel Number (APN) 045-600-017-000
7. **Project sponsor's name and address**: VB BTS III, LLC
8. **General Plan designation**: Urban
9. **Zoning**: A-1-U (Limited Agriculture with an Urban Overlay)

10. **Description of project**: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

The proposed facility is designed to house the equipment necessary to fill a significant gap in T-Mobile's 5G and 4G LTE coverage. The tower will contain T-Mobile equipment (up to 12 panel antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment). The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future co-locators has been made available on the tower as encouraged under Title 9, Division 24.

The ground equipment will also be contained within the fenced area, including two (2) ground-mounted radio cabinets, one (1) back-up diesel generator and an ice bridge from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas. Access to the lease area is being proposed to be a 30 ft long and 12 ft wide graveled road.

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area.

11. **Surrounding land uses and setting**: The proposed wireless communication facility would be located at 1734 E Underwood Rd, Holtville, CA 92250 and will disturb approximately 1,600 ft^2 of the 5.51-Acre subject parcel. The property is identified as Assessor's Parcel Number (APN) 045-600-017-000 and is further described as Block 65 & W2 of VAC ST ADJ TSTE TR 87 15-15 5.51 AC, Section 26, Township 15 South, Range 15 East of the San Bernardino Base and Meridian (S.B.B.M.). The proposed project site is surrounded by parcels zoned as A-1-U (Limited Agriculture with an Urban Overlay) on the North, East and West and by other parcels zoned as R-1-U (Light Residential with an Urban Overlay) on the South. The proposed project is consistent with the A-1 zone under an approved Conditional Use Permit (Division 5, Section 90507.02(jj)).

12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.): Planning Commission.

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested

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consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentially, etc.?

The Quechan and Campo Band of Mission Indian Tribes have requested to be consulted under Assembly Bill 52. Consultation letters were sent to the Quechan and Campo Band of Mission Indian Tribes on April 30, 2025. The County received on April 30, 2025, an email response from the Quechan Indian Tribe advising they had no comments for this project. Additionally, an email from the Campo Band of Mission Indians Tribe was received on May 17, 2025, mentioning possible concerns on the project location. After further review of the project scope of work, no additional comments have been submitted.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code, Section 21080.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code, Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code, Section 21082.3 (c) contains provisions specific to confidentiality.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

After Review of the Initial Study, the Environmental Evaluation Committee has:

☒ Found that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ Found that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ Found that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Found that although the proposed project could have a significant effect on the environment, ~~because~~ all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☒	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☒
OFFICE EMERGENCY SERVICES	☒	☐	☐
APCD	☒	☐	☐
AG	☒	☐	☐
SHERIFF'S DEPARTMENT	☐	☐	☒
ICPDS	☒	☐	☐

Jim Minnick, Director of Planning/EEC Chairman

Date: 7-24-2025

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PROJECT SUMMARY

A. **Project Location**: The proposed wireless communication facility would be located at 1734 E Underwood Rd, Holtville, CA 92250; Assessor's Parcel Number (APN) 045-600-017-000.

B. **Project Summary**: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

The proposed facility is designed to house the equipment necessary to fill a significant gap in T-Mobile's 5G and 4G LTE coverage. The tower will contain T-Mobile equipment (up to 12 panel antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment). The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future co-locators has been made available on the tower as encouraged under Title 9, Division 24.

The ground equipment will also be contained within the fenced area, including two (2) ground-mounted radio cabinets, one (1) back-up diesel generator and an ice bridge from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas. Access to the lease area is being proposed to be a 30 ft long and 12 ft wide graveled road.

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area.

C. **Environmental Setting**: The proposed project site is located within a parcel containing an existing residence towards the southeast corner of the parcel owned by Jesus Diaz Gonzales, zoned as A-1-U (Limited Agriculture with an Urban Overlay). The proposed project site is relatively flat, located towards south of Thiesen Road and north of Underwood Road, +/- 740 feet east of Melon Rd in an unincorporated portion of the County of Imperial, approximately 670 feet north from the City of Holtville and 8 miles northeast from the City of El Centro.

D. **Analysis**: The proposed project is for the installation of a 120-foot monopole communication tower with a (10) ten-foot lightning rod, for a total height of 130-foot tower on a 40' x 40' leased, fenced area and remote, unmanned equipment. The proposed height of the tower does not conform to the maximum height limit of the project's site A-1 zone requirements, which allows a communications tower up to 60 feet in height. For this reason, the project was reviewed by the Airport Land Use Commission on June 18, 2025, and was found to be consistent with the 1996 Airport Land Use Compatibility Plan. Initial Study #25-0012 will analyze any impacts related to the proposed project.

E. **General Plan Consistency**: Per the Imperial County General Plan, the land use designation for this project is "Agriculture." The proposed project is consistent with the A-1 zone under an approved Conditional Use Permit (Division 5, Section 90508.02(s)), it is determined that it seems to be consistent with Division 24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

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Exhibit "A"
Vicinity Map

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PROJECT LOCATION MAP

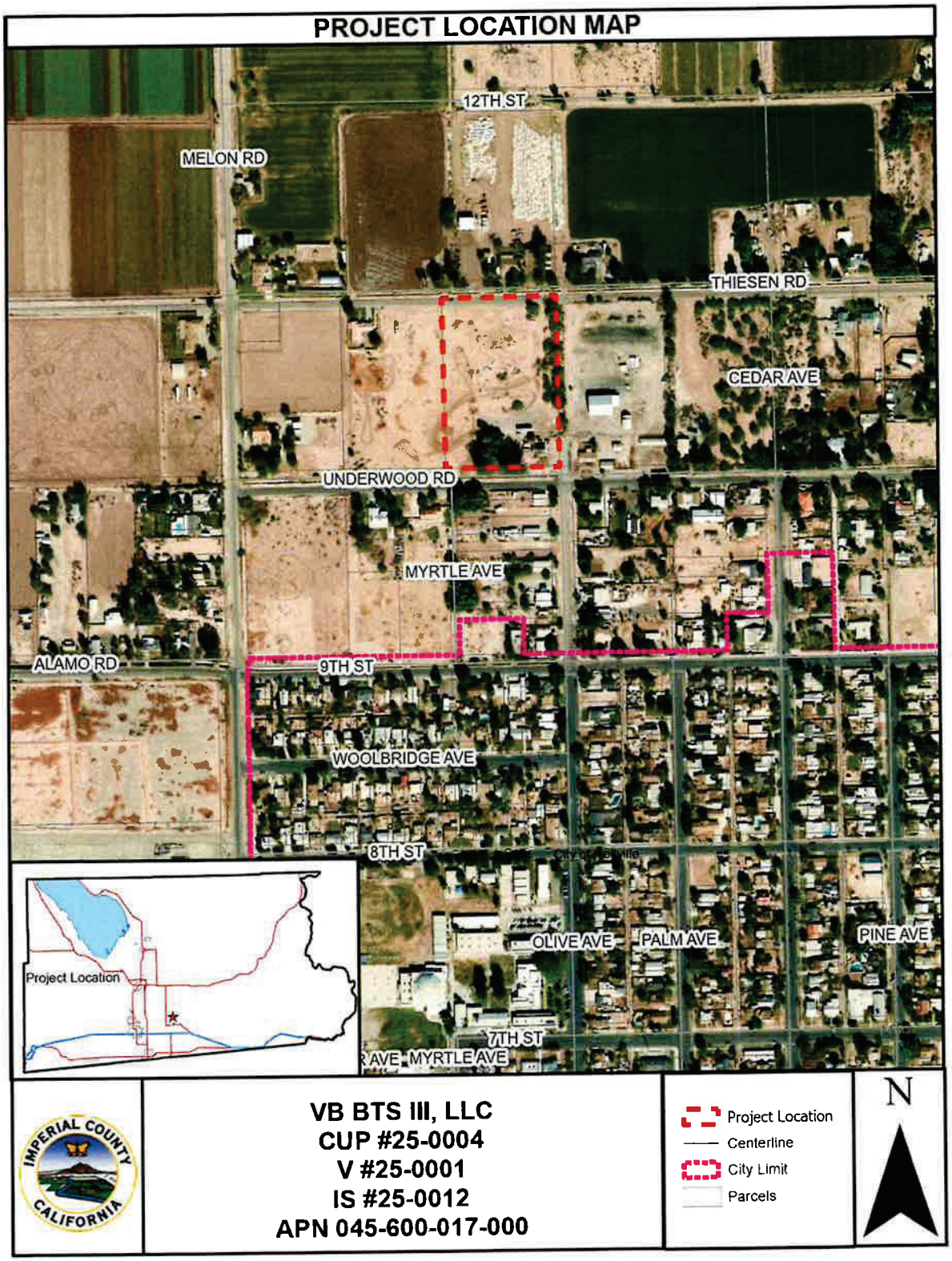
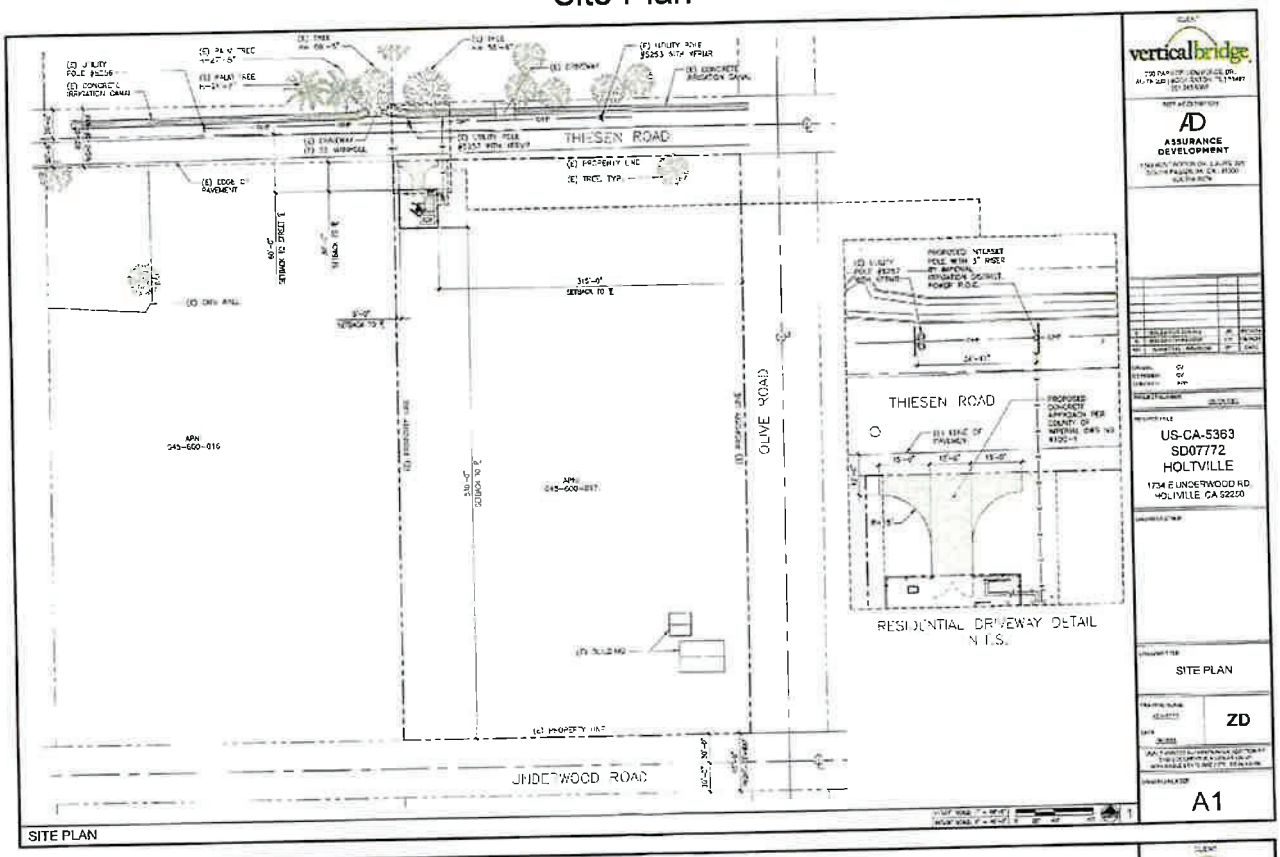
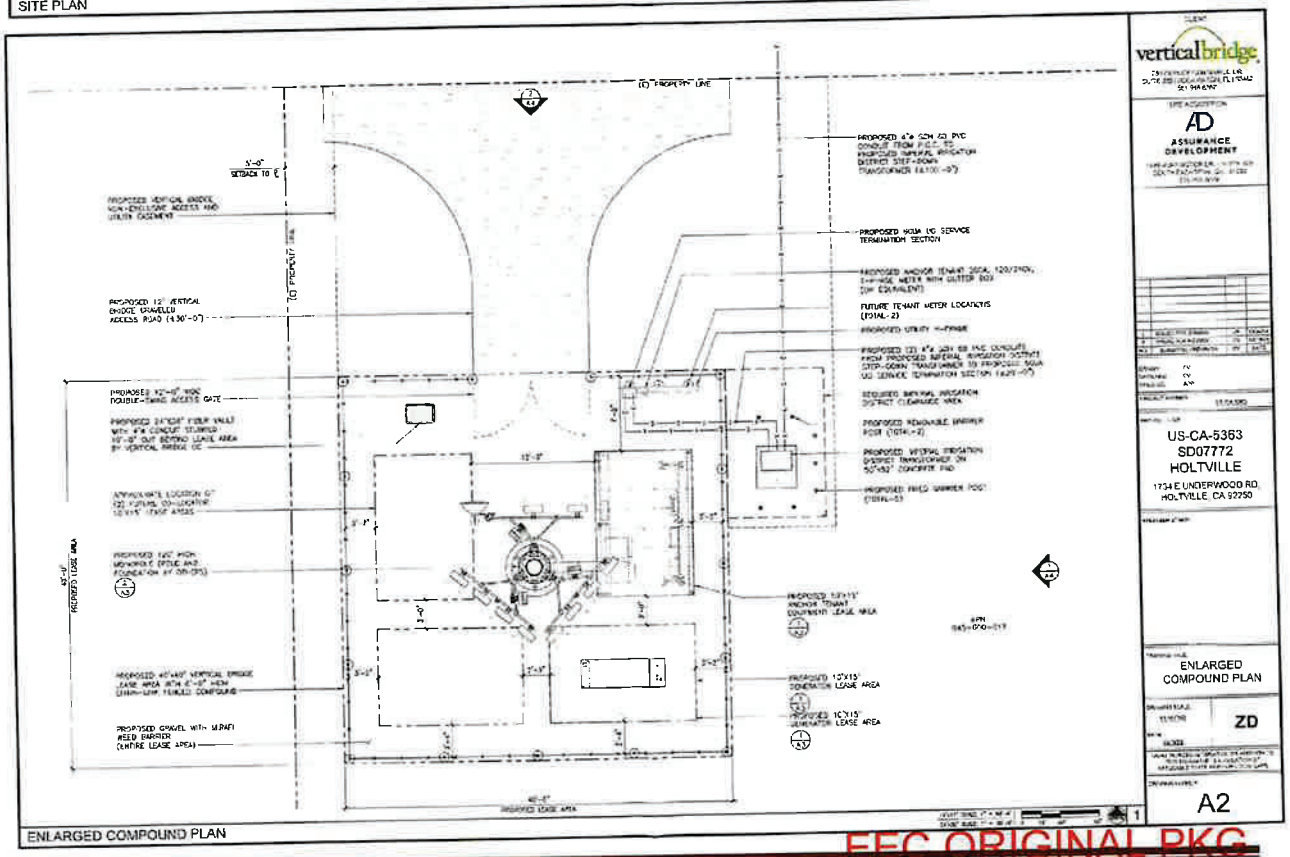


Exhibit "B"
Site Plan





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EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

I. *AESTHETICS*

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista or scenic highway? ☐ ☐ ☐ ☒

a) Four areas within the County have the potential as state-designated scenic highways; however, the project site is not located near any scenic vista or scenic highway according to the Imperial County General Plan Circulation and Scenic Highway Element[1] and California State Scenic Highway System Map[2]. Additionally, the proposed telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment. No impacts are expected.

b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☐ ☒

b) As previously stated on section (I)(a), the proposed project is not located near a scenic vista or scenic highway and would not substantially damage any scenic resources. No impacts are expected.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? ☐ ☐ ☐ ☒

c) The proposed unmanned telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment and would not significantly or physically degrade the visual character of the site and its surroundings. It is also consistent with the Aesthetic requirements as specified in the County's Communication Ordinance (Division 24), Section 92404.01(R). No impacts are anticipated.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

d) As previously stated on section (I)(a), the proposed unmanned telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Additionally, per Imperial County's Communication Ordinance (Division 24), Section 92401.04(I), all communication facilities, including towers, shall be lit with approved lighting as required by the Federal Aviation Administration (FAA) and Airport Land Use Commission (ALUC) standards. Subsequently, on June 18, 2025, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed self-supported monopole telecommunications tower project and found it to be consistent with the 1996 Airport Land Use Compatibility Plan. A white daytime beacon and a red night beacon will be required for this proposed project. Compliance with FAA and ALUC standards would bring any impact to less than significant.

II. *AGRICULTURE AND FOREST RESOURCES*

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. --Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☒

a) The proposed project is for the construction of an unmanned telecommunications tower located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-

[1] Imperial County General Plan, Circulation and Scenic Highway Element https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf
[2] California State Scenic Highway System Map https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c1...

EES SIGNATURE PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

Family Dwelling Unit is currently located on the Southeast corner. Additionally, the proposed project site is listed as "Other Land" per the California Important Farmland Finder: Imperial County 2018[3]; the proposed project will not convert any type of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impacts are expected.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒

b) The County of Imperial has no current active Williamson Act contracts. Additionally, according to the California Williamson Act Enrollment Finder[4], Imperial County is withdrawn from the 2022 Williamson Act; therefore, the proposed project is not expected to conflict with existing zoning for agricultural use, or a Williamson Act Contract. No Impacts are expected.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ☐ ☐ ☐ ☒

c) As previously stated on section (II)(a), the proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. The current land use designation per Imperial County General Plan Land Use Map[5] is Urban and it is not expected that the proposed project conflicts with existing zoning, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 5114(g)). Therefore, no impact is expected.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

d) As previously stated under item (II)(c) above, the proposed project is not located in a forest land, therefore, it is not expected to result in the loss of forest land or conversion of forest land to non-forest. Therefore, no impact is expected.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

e) As previously stated on section (II)(a), the proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. The current land use designation per Imperial County General Plan Land Use Map[5] is Urban and it is not expected that the proposed project will conflict with existing zoning, or cause rezoning that would result in the loss or conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, no impact is expected.

III. *AIR QUALITY*

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to the following determinations. Would the Project:

a) Conflict with or obstruct implementation of the applicable air quality plan? ☐ ☐ ☒ ☐

a) The proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. It is not expected that the proposed project will conflict with or obstruct implementation of the applicable air quality plan. Per Imperial County Air Pollution Control District's comment letter dated May 13, 2025[6], the project must comply with all Air District rules and regulations and would emphasize Regulation VIII. Regulation VIII is a collection of rules designed to limit emissions of fugitive dust to 20% opacity. Any generator included in the scope of work of the project exceeding 50 horsepower will be subject to permitting requirements. The applicant will be required to contact the Permitting & Engineering Division of the Air

[3] California Important Farmland Finder: Imperial County 2018 https://maps.conservation.ca.gov/DLRP/CIFF/
[4] California Williamson Act Enrollment Finder https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html
[5] Imperial County General Plan Land Use Map https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=078e1e32c6dc4223ba8c7d69d7c6c383
[6] Imperial County Air Pollution Control District Comment Letter dated May 13, 2025

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

District to confirm if a permit is required. Adherence and compliance with ACPD's rules and regulations will bring any impact to less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ☐ ☐ ☒ ☐

b) As previously stated under item (III)(a) above, the proposed unmanned wireless telecommunications tower with associated remote and unmanned equipment shall comply with the rules and regulations of the Imperial County Air Pollution Control District. It is expected that by following the above-mentioned rules and regulations, the proposed project would not substantially contribute to an existing or projected air quality violation. Therefore, any impacts are expected to be less than significant.

c) Expose sensitive receptors to substantial pollutants concentrations? ☐ ☐ ☒ ☐

c) The proposed wireless telecommunications tower with associated remote and unmanned equipment is not expected to expose sensitive receptors to substantial pollutants concentrations. However, during the construction phase any earth-moving activities and diesel exhaust and volatile organic compound (VOC) emissions which are typically related to construction trucks and machinery are the pollutants that could possibly affect the nearest sensitive receptors, and exposure would be temporary and would be lessened by adhering to Air Pollution Control District's and Division of Environmental Health rules and regulations. Compliance with APCD's requirements would bring any impact to less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? ☐ ☐ ☒ ☐

d) The proposed project does not anticipate creating objectionable odors that would adversely affect a substantial number of people. Although some pollutants may be emitted during construction activities and as previously stated on item (III)(a) above, compliance with ACPD's Regulation VIII, and adherence to the California Building Code would bring any impacts to less than significant.

IV. *BIOLOGICAL RESOURCES Would the project:*

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

a) The proposed project will be located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner of the subject property. Said location is surrounded by other parcels with residential uses on its majority, with the exception of the parcel towards east, which is owned by the County of Imperial and currently occupied by Public Works. All neighboring parcels have been disturbed by at least one building and are currently being occupied. According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 1 "Sensitive Habitat Map"[7a] the project is not located within a sensitive habitat area. Additionally, in accordance to Figure 2 "Sensitive Species Map"[7b] and the Department of Fish and Wildlife Predicted Habitat Map[8], the project is located within the Burrowing Owl Species Distribution Model area. Subsequently, according to U.S. Fish and Wildlife Service Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning publication[9]: Sitting and Construction of New Towers, section (5)(a) – "Tower Design," new towers should be no more than 199 feet above ground level (AGL) as this height increases the mean free airspace between the top of the tower and average bird flight height, even in weather conditions with reduced cloud ceiling. Moreover, in accordance with section (5)(c)(iii), if taller than 199 feet AGL, towers requiring lights for aviation safety must be constructed and the minimum amount of pilot warning and obstruction avoidance lighting required

[7] Imperial County General Plan: Conservation and Open Space Element https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf

[8] California Department of Fish and Wildlife Burrowing Owl Predicted Habitat https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25

[9] U.S. Fish and Wildlife Service, Recommended Best Practices for Communication Tower: Design, Sitting, Construction, Operation, Maintenance, and Decommissioning https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

by the FAA should be used. However, the proposed project includes a 130 feet tower that would not exceed the maximum height recommended by the U.S. Fish and Wildlife. Consequently, it does not appear to have a substantially adverse effect, either directly or through habitat modification, or to any species identified as a candidate, sensitive, or of special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife Service. Adherence to the U.S. Fish and Wildlife & FAA standards and regulations should bring any impacts to less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

b) As previously stated on section (IV)(a), the proposed project site is not located within a sensitive or riparian habitat, or on other sensitive natural community area as depicted on Figure 3 "Agency-Designated Habitats Map[7C]" from the Imperial County General Plan's Conservation and Open Space Element[7]. Additionally, the proposed project site is within a parcel with an existing single family dwelling unit; this lot is actively being used for residential purposes; therefore, it does not appear to have a substantial effect in local regional plans, policies, and regulations with respect to sensitive natural communities or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Any impacts are expected to be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☒ ☐

c) According to the National Wetlands Inventory: Surface Waters and Wetlands Map[10], National Water Information System: Mapper[11], and California Sustainable Groundwater Management Act (SGMA) Data Viewer[12], the proposed project is not located within a riparian habitat and which will not cause a substantial adverse effect on federal protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Any impacts are expected to be less than significant.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☒ ☐

d) The proposed project site is located on a parcel zoned as A-1 (Limited Agriculture) with an existing Single Family Dwelling Unit located on the Southeast portion of the property, said parcel contains an overall area of approximately ±5.51 acres, while the proposed project expects to occupy an estimated area of 1,600 sq. ft. The project location is adjacent to other parcels with the same zone with existing residential uses. As previously stated on item (IV)(b) above, the project site is not located within a Sensitive Habitat; therefore, it would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Any impacts are expected to be less than significant.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

e) The proposed project does not conflict with any local policy or ordinance protecting biological resources, such as tree preservation policies or ordinances. No impacts are expected.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ☐ ☐ ☒ ☐

f) The proposed project site is not located within a designated sensitive area according to the Imperial County General Plan's Conservation and Open Space Element[7]; therefore, it would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any impacts are expected to be less than significant.

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[10] National Wetlands Inventory: Surface Waters and Wetlands Map https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

[11] National Water Information System: Mapper https://maps.waterdata.usgs.gov/mapper/index.html

[12] California Sustainable Groundwater Management Act (SGMA) Data Viewer https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

V. ***CULTURAL RESOURCES Would the project:***

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 5-"Areas of Heightened Historic Period Sensitivity Map[7d]," the proposed project site may be located within the Sitgreaves and Parke Exploration and Trail Route (1770-1890). Additionally, in accordance to Figure 6-"Known Areas of Native American Cultural Sensitivity,[7e]" the proposed project site is not located within the immediate vicinity of a known area of cultural sensitivity to Native Americans. Furthermore, the proposed project would be located in a parcel with existing residential development, adjacent to other parcels with existing residential uses with no documented or known archeological resources. Any impact would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ☐ ☐ ☒ ☐

b) The proposed project site is located on a parcel with an existing Single Family Dwelling Unit located on the Southeast portion of the property, said parcel contains an overall area of approximately ±5.51 acres, while the proposed project expects to occupy an estimated area of 1,600 sq. ft. Additionally, the project location is adjacent to other parcels with existing residential uses with no documented nor known archeological resources. The proposed wireless telecommunication facility project is not likely to cause a substantial adverse change to any archeological resource. Any impacts are expected to be less than significant.

c) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☐ ☒ ☐

c) As previously stated on items (V)(a) and (V)(b) above, the proposed project site is not located within or adjacent to any cemeteries, therefore, the proposed wireless telecommunication facility would not disturb any human remains, including those interred outside of dedicated cemeteries. Additionally, in the event of an accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county is contacted to determine that no investigation of the cause of death is required. In addition, the coroner of the county shall contact the Native American Heritage Commission (NAHC) within 24 hours if such remains are believed to pertain to a deceased Native American. Any impacts are expected to be less than significant.

VI. ***ENERGY Would the project:***

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ☐ ☐ ☒ ☐

a) The proposed telecommunications tower facility is not proposing any changes in the existing allowed uses, currently agricultural and residential, therefore, it will not result in potentially significant environmental impacts due to wasteful, insufficient, or unnecessary consumption of energy resources, during the project construction or operation. Additionally, the proposed project site is located within a parcel with residential uses, including a Single-Family Dwelling Unit. Should any new developments occur, said developments would require compliance with the latest edition of the California Building Code and ministerial building permits with the Imperial County Planning and Development Services Department. Furthermore, per comment letter received from the Imperial Irrigation District[13] dated May 2, 2025, if the proposed communication tower requires electrical services, the applicant should contact IID. Any impacts are expected to be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

b) As previously stated on item (VI)(a) above, the proposed project is for a telecommunications tower facility which does not propose any changes in the existing allowed uses of the subject parcel. New future developments would require compliance with the latest energy efficiency and renewable energy standards and regulations. Therefore, the proposed project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Any impacts are expected to be less than significant.

[13] Imperial Irrigation District, Comment letter dated May 2, 2025

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

VII. ***GEOLOGY AND SOILS Would the project:***

a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: ☐ ☐ ☒ ☐

a) The proposed telecommunications tower facility does not appear to conflict with the geology and soils of the subject parcel on which it is to be situated. Construction and erection of the proposed self-supported monopole telecommunications tower with associated remote and unmanned equipment will be subjected to comply with the latest edition of the California Building Code as well as going through a ministerial building permit review. Therefore, the proposed project would not directly or indirectly cause a potential substantial adverse effects, including risk of loss, injury, or death involving. Adherence and compliance to these standards and regulations would bring any impact to less than significant.

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? ☐ ☐ ☒ ☐

1) According to the California Department of Conservation: Fail Activity Map[14], United States Geological Survey's Quaternary Faults Map[15], Imperial County General Plan Seismic and Public Safety Element[16], Figure 2 "Regional Fault Lines", the proposed project site is not located within known fault zone. Although the Brawley Seismic Zone is located approximately 1.35 miles west of the proposed project site, Imperial County is classified as Seismic Zone D per Section 1613 et. seq. of the California Building Code, which requires that any developments within this zone to incorporate the most stringent earthquake resistant measures. The proposed telecommunications tower project would be subject to the latest edition of the California Building Code as well as going through a ministerial building permit review. Adherence and compliance with these standards and regulations would bring any impact to less than significant levels.

2) Strong Seismic ground shaking? ☐ ☐ ☒ ☐

2) As previously stated on item (VII)(a)(1) above, the proposed project is located approximately 1.35 miles west of the Brawley Seismic Zone indicating seismic ground shaking could be expected. Adherence to the latest edition of the California Building Code and as well as to go through a ministerial building permit review would bring any impacts to less than significant levels.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami? ☐ ☐ ☐ ☒

3) The proposed project site is not located in a seiche/tsunami area per the California Tsunami Data Maps[17]. No impacts are expected.

4) Landslides? ☐ ☐ ☒ ☐

4) According to Imperial County General Plan's Seismic and Public Safety Element[16], Figure 3 "Landslide Susceptibility", the proposed project site is not located within the immediate vicinity of a landslide activity area. The topography within the proposed project site is generally flat. However, the construction and erection of the proposed telecommunications facility would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Therefore, less than significant impacts are expected.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

b) According to Imperial County General Plan's Seismic and Public Safety Element[17], Erosion (page 15), areas in Imperial County that are most susceptible to erosion include the Algodones Sand Dunes, as well as the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The proposed project is not located within the immediate vicinity of a substantial

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[14] California Department of Conservation: Fail Activity Map https://maps.conservation.ca.gov/cgs/fam/

[15] United States Geological Survey's Quaternary Faults Map https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf

[16] Imperial County General Plan Seismic and Public Safety Element https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf

[17] California Tsunami Data Maps https://www.conservation.ca.gov/cgs/tsunami/maps

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

soil erosion area. Any impacts are expected to be less than significant.

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? ☐ ☐ ☒ ☐

c) As previously stated on sections (VII)(a)(1)-(VII)(a)(4) and (VII)(b) above, the proposed project site is not located on a geological unit that would become unstable or collapse as a result of the proposed telecommunications facility project. Any construction would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to these standards and regulations would bring any impact to less than significant.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? ☐ ☐ ☒ ☐

d) According to the U.S. Department of Agriculture, Natural Resources Conservation Service "Soil Maps"[18] the proposed project site is located on an area containing Imperial-Glenbar, and silty clays loams. However, as previously stated on section (VII)(c), the proposed project design and subsequent construction will require adherence and compliance to the latest edition of the California Building Code standards and regulations, as well as going through a ministerial building permit review which would bring any impacts to less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ☐ ☐ ☐ ☒

e) The proposed project is for the construction and erection of a telecommunications tower which does not propose any septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Additionally, should any septic systems be proposed in the near future, the applicant should adhere and comply with the Imperial County Public Health Department, Division of Environmental Health standards and regulations. No Impacts are expected.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☐ ☒ ☐

f) The proposed project is to be located within a parcel with residential development and does not appear to directly or indirectly destroy a unique paleontological resource or site of unique geologic feature on site as there are no known unique resources or features on site or records of. Additionally, in the event of any paleontological findings on site during construction, all work shall be stopped, and applicant shall contact a qualified paleontological specialist to inspect the site. Any impacts are expected to be less than significant.

VIII. *GREENHOUSE GAS EMISSION* *Would the project:*

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ☐ ☐ ☒ ☐

a) The proposed telecommunications tower facility is to be located on an area surrounded by parcels already impacted with existing agricultural and residential uses. The action is not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, as previously stated on item (III)(a) above, during the construction phase any earth-moving activities and diesel exhaust and volatile organic compound (VOC) emissions which are typically related to construction trucks and machinery are the pollutants that could possibly affect the nearest sensitive receptors and exposure would be temporary and would be lessened by adhering to Air Pollution Control District's and Division of Environmental Health rules and regulations. Adherence and compliance to APCD's and EHS' rules, regulations, and requirements would bring any impact to less than significant.

b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? ☐ ☐ ☒ ☐

b) The proposed project would not conflict with any regulations under AB 32 Global Warming Solutions Act of 2006, of

[18] U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Maps https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

reducing the emissions of greenhouse gases to 1990 levels by 2020 provided that the applicant adheres to APCD's and EHS' rules, regulations and requirements. Less than significant impacts are expected.

IX. *HAZARDS AND HAZARDOUS MATERIALS Would the project:*

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ☐ ☐ ☒ ☐

a) The proposed project is not expected to create a significant hazard to the public or the environment as it does not involve the handling of any hazardous materials. If the applicant intends to have generator(s) or storage equipment storing 1,320 gallons of petroleum-based products, applicant should contact EHS. Additionally, the applicant shall contact the Air Pollution Control District if the generator exceeds 50 horsepower for an additional permit. Adherence to EHS and APCD requirements should bring any impact to less than significant.

b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ☐ ☐ ☒ ☐

b) As previously stated on section (IX)(a) above, the proposed project is not expected to create a significant hazard to the public nor environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment as no hazardous materials are anticipated as part of the project. Additionally, adherence to EHS and APCD requirements should bring any impacts to less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ☐ ☐ ☐ ☒

c) The proposed project does not anticipate the emitting of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste as previously stated on items (IX)(a) and (IX)(b) above. Additionally, the nearest school (Holtville High School) is located outside a one-quarter (¼) of a mile radius from the project site, approximately 1,800 ft south. Based on this information and the information provided on the items referenced above, the proposed project would not represent a risk to educational facilities. No impacts are expected.

d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ☐ ☐ ☐ ☒

d) The proposed project is not located on a site included on a list of hazardous materials sites according to California Department of Toxic Substances Control EnviroStor[19] or within any of the listed facilities/sites from page 35 of the Imperial County General Plan: Seismic and Public Safety Element[16]; therefore, no impacts are expected.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? ☐ ☐ ☒ ☐

e) The proposed project is not located within an airport land use plan per Imperial County Airport Land Use Compatibility Maps[20]. Additionally, on June 18, 2025, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed wireless telecommunications tower with associated remote and unmanned equipment project and found it to be consistent with the 1996 Airport Land Use Compatibility Plan. A white daytime beacon and a red night beacon will be required for this proposed project. Compliance with the Federal Aviation Administration (FAA) and ALUC standards, regulations, and recommendations would bring any impact to less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☒ ☐

[19] California Department of Toxic Substances Control EnviroStor https://www.envirostor.dtsc.ca.gov/public/

[20] Imperial County Airport Land Use Compatibility Maps https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

f) The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. The applicant would meet any requirements requested by the IC Fire/OES Department. Less than significant impacts are expected.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☒ ☐

g) According to CalFire's "Fire Hazard Severity Zones in Local Responsibility Areas – Imperia County Map"[21] effective April 1, 2024, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned; therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildfires. Additionally, as previously discussed in section (IX)(f), the applicant would meet any requirements as set forth by the Imperial County Fire/OES Department. Compliance with the Imperial County Fire Department (ICFD) standards, requirements, and recommendations would bring any impact to less than significant, with mitigations.

X. *HYDROLOGY AND WATER QUALITY Would the project:*

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☒ ☐

a) The proposed project is for the construction and erection of a telecommunications tower facility with associated remote and unmanned equipment and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Any impacts are expected to be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ☐ ☐ ☒ ☐

b) As previously stated on item (X)(a) above, the proposed telecommunications facility does not expect to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Any impacts are expected to be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: ☐ ☐ ☒ ☐

c) The proposed project does not anticipate a physical alteration to the site that would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces. Additionally, per comment letter received from the Imperial Irrigation District dated May 2, 2025[13], an IID encroachment permit is required to utilize existing surface-water drainpipe connections to drains and receive drainage service from the district. Furthermore, any proposed grading will require drainage review and approval from the Imperial County Public Works Department. Adherence to IID and ICDPW requirements would bring any impacts to less than significant.

(i) result in substantial erosion or siltation on- or off-site; ☐ ☐ ☒ ☐

(i) According to Imperial County General Plan's Seismic and Public Safety Element[16], Erosion (page 15), areas in Imperial County that are most susceptible to erosion include the Algodones Sand Dunes, as well as the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The proposed project site is not located within these areas. Additionally, as previously stated in section (X)(c) above, the Applicant shall furnish a Drainage and Grading Plan to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site proprieties. Therefore, adherence to ICDPW's standards and requirements would bring any impact to less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ☐ ☐ ☒ ☐

(ii) The proposed project is not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite as the existing drainage patterns would not be substantially altered. Also, as previously

[21] CalFire: Fire Hazard Severity Zones in Local Responsibility Areas-Imperial County Map

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

stated on section (X)(c) above, the Applicant shall furnish a Drainage and Grading Plan to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site proprieties. Compliance with the Imperial County Department of Public Works requirements would bring any impact to less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; ☐ ☐ ☒ ☐

(iii) The proposed project does not anticipate creating or contributing runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As previously stated on items (X)(c) and (X)(c)(ii) above, any proposed grading or planned stormwater drainage systems will require drainage application, review, and approval from the Imperial County Public Works Department and Imperial Irrigation District. Compliance with Imperial County Public Works Department and Imperial Irrigation District standards and requirements would ensure that any runoff water impacts would be reduced to less than significant levels.

(iv) impede or redirect flood flows? ☐ ☐ ☒ ☐

(iv) The proposed project is for the construction and erection of a self-supported monopole telecommunications tower facility with associated remote and unmanned equipment and is not expected to impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map[22], the proposed project site is located within "Zone X" of flood map 06025C1734C, effective September 26, 2008. Additionally, a reviewed and approved grading/drainage letter is to be required by the Imperial County Department of Public Works. Therefore, compliance with ICDPW's standards would bring any impact to less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? ☐ ☐ ☒ ☐

d) The proposed wireless telecommunications tower facility with associated remote and unmanned equipment project is not located within the proximity of a flood hazard, tsunami, or seiche zones; therefore, impacts related to risk release of pollutants due to project inundation are considered to be low. Additionally, as previously stated on item (X)(c)(iv) above, the proposed project site is located within "Zone X" of flood map 06025C1734C. Compliance with ICDPW's standards would contribute to lower any impacts to less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? ☐ ☐ ☒ ☐

e) The proposed project is not expected to conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. As previously stated on item (X)(c) above, the proposed project would require a grading letter approved by the Imperial County Public Works Department and adherence to Imperial Irrigation District requirements. Any impacts are expected to be less than significant.

XI. *LAND USE AND PLANNING Would the project:*

a) Physically divide an established community? ☐ ☐ ☐ ☒

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment which would not physically divide an established community; therefore, it does not anticipate changing the existing land use designation and zoning established. No land use or planning impacts are expected.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? ☐ ☐ ☒ ☐

b) The proposed project is consistent with the Imperial County General Plan and with the County's Land Use Ordinance (Title 9), Division 5, Section 90507.02(s), which states that Communication Towers are permitted in the A-1 (Limited/Light Agriculture) zone only with an approved Conditional Use Permit. Additionally, the proposed project is consistent with the

[22] Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

County's Land Use Ordinance (Title 9), Division 24 – Communication Ordinance, Section 92401.00 et seq. Any impacts are expected to be less than significant.

XII. ***MINERAL RESOURCES*** ***Would the project:***

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? ☐ ☐ ☐ ☒

a) The proposed project does not anticipate the removal of mineral resources, and it is not located within the boundaries or vicinity of an active mine per Imperial County General Plan's Conservation and Open Space Element, "Existing Mineral Resources Map"-Figure 8[7F]. No impacts are expected.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐ ☒

b) The proposed telecommunications tower will not result in the loss of availability of locally important mineral resources recovery site delineated on a local general plan, specific plan or other land use plan. No impacts are expected.

XIII. ***NOISE*** ***Would the project result in:***

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ☐ ☐ ☒ ☐

a) The proposed project is for the construction and erection of a self-supported wireless telecommunication tower with associated remote and unmanned equipment. A temporary generation of noise would be expected during construction; however, such would not result in the generation of permanent noise beyond that which already occurs on the surrounding area. Such an action would be subject to the Imperial County General Plan's Noise Element[23] which states that construction equipment operations shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and from 9 a.m. to 5 p.m. on Saturday. Additionally, construction noise from a single piece of equipment or combination, shall not exceed 75 dB Leq when averaged over an eight (8) hour period. Compliance with the Imperial County General Plan's Noise Element would bring any impact to less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

b) Ground vibration or groundborne noise may be expected during the telecommunications tower construction and erection; however, as previously stated on item (XIII)(a) above, any construction would be subject to Imperial County General Plan's Noise Element. Any impacts are expected to be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ☐ ☐ ☒ ☐

c) As previously stated on item (IX)(e) above, proposed project is not located within an airport land use plan or private airstrip according to the Imperial County Airport Land Use Compatibility Maps[20]. The nearest airport in the vicinity is the Holtville Airport located approximately six (6) miles east from the proposed project site; therefore, exposure to periodic noise emissions during aircraft takeoff and landing operations are not expected. Any impacts are expected to be less than significant.

XIV. ***POPULATION AND HOUSING*** ***Would the project:***

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of ☐ ☐ ☒ ☐

23 Imperial County General Plan, Noise Element https://www.icpds.com/assets/planning/noise-element-2015.pdf

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

roads or other infrastructure)?

a) The proposed construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment would not induce substantial unplanned population growth in an area, either directly or indirectly, as no changes to the designated agricultural use on the parcel are proposed. Therefore, any impacts are expected to be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☒ ☐

b) The proposed project would not displace substantial numbers of people necessitating the construction or replacement housing elsewhere as no changes to the existing designated agricultural use on the parcel were proposed. Any impacts are expected to be less than significant.

XV. *PUBLIC SERVICES*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: ☐ ☐ ☒ ☐

a) The proposed telecommunications tower does not anticipate that such would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios. Any impact would be less than significant.

1) Fire Protection? ☐ ☐ ☒ ☐

1) The proposed project is not expected to result in substantial impacts on fire protection. Any future developments may be subject to fire sprinklers and to have either a private or a public source of water for fire suppression purposes such as pressurized hydrants. Compliance with ICFD requirements would bring any impacts to less than significant.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed project is not expected to result in substantial impacts on police protection as after construction, the facility would be unmanned and remotely monitored once constructed. However, should any police protection be required, both the California Highway Patrol and Sheriff's Office South County Patrol have active policing and patrol operations in the area[24]. Any impacts are expected to be less than significant.

3) Schools? ☐ ☐ ☐ ☒

3) The proposed self-supported wireless telecommunications tower facility with associated remote and unmanned equipment is not expected to have a substantial impact on schools. The closest schools within the vicinity of the proposed project site is the Holtville High School located outside a ¼ mile radius, approximately 1,800 feet south in the city of Holtville. No impacts are expected.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed project is not expected to create a substantial impact on parks. No impacts are expected.

5) Other Public Facilities? ☐ ☐ ☒ ☐

5) The proposed telecommunications tower is not expected to have a substantial impact on other public facilities; therefore, any impacts are expected to be less than significant.

XVI. *RECREATION*

a) Would the project increase the use of the existing ☐ ☐ ☐ ☒

[24] Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment. Subsequently, the proposed telecommunications tower would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impacts are expected.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse effect on the environment? ☐ ☐ ☐ ☒

b) The proposed telecommunications tower does not include nor require the construction or expansion of recreational facilities which might have an adverse effect on the environment; therefore, no impacts are expected.

XVII. *TRANSPORTATION* *Would the project:*

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ☐ ☐ ☒ ☐

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote equipment. After construction, the proposed wireless telecommunications facility will be unmanned and will only require service technicians to visit the site periodically. The proposed telecommunications tower is not expected to conflict with the Imperial County General Plan Circulation and Scenic Highway Element and/or any applicable plan, ordinance or policy related to it. Traffic impacts during construction and subsequent operations of the telecommunications facility are expected to be below the acceptable threshold by the County. Less than significant impacts are expected.

b) Would the project conflict or be inconsistent with the CEQA Guidelines section 15064.3, subdivision (b)? ☐ ☐ ☒ ☐

b) The proposed self-supported telecommunications tower is approximately 1.15 miles away from the intersection between Thiesen Road and State Highway 115, it does not appear to conflict or be inconsistent with the CEQA guidelines section 15064.3 (b). Any impacts are expected to be less than significant.

c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ☐ ☐ ☒ ☐

c) The proposed project is for the construction and erection of a self-supported telecommunications tower facility with associated remote and unmanned equipment located within a parcel with an existing single family dwelling unit. The proposed project's site is compatible with the Imperial County General Plan Land Use Designation and the site design is not expected to increase hazards. Therefore, less than significant impacts are expected.

d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

d) The proposed project would not result in inadequate emergency access. Additionally, no change on existing land use nor zoning are proposed. Access to the proposed project site from Thiesen Road appears to be suitable for emergency response vehicles. Less than significant impacts are expected.

XVIII. *TRIBAL CULTURAL RESOURCES*

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is: ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 6, the project site is not located within a "Known Area of Native American Cultural Sensitivity". Furthermore, the proposed project would be located in a parcel with existing residential development, adjacent to other parcels with existing residential uses with

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

no documented nor known archeological resources. Any impact would be less than significant.

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as define in Public Resources Code Section 5020.1(k), or ☐ ☐ ☒ ☐

(i) According to the California Historic Resources[25] in Imperial County, the proposed project site is not listed or seem to be eligible under the Public Resources Code Section 21074 or 5020.1 (k); therefore, any impacts are expected to be less than significant.

(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth is subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. ☐ ☐ ☒ ☐

(ii) As mentioned on item (XVIII)(a) Imperial County General Plan's Conservation and Open Space Element[7] does not identify the project location as a "Known Area of Native American Cultural Sensitivity. Additionally, on item (XVIII)(a-i), there are no records of the project site being listed or near a location listed under Public Resources Code Section 21074 or 5020.1(k). Furthermore, as described in Public Resources Code 5024.1, subdivision (c), the proposed project location is not known to be associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage, nor the lives of persons important in our past. The existing residential development within the project location and the surrounding properties do not embody distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. There are also no records of the project location yielding information important in prehistory or history. Based on this information, any impact would be expected to be less than significant.

XIX. ***UTILITIES AND SERVICE SYSTEMS*** ***Would the project:***

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? ☐ ☐ ☒ ☐

a) The proposed self-supported wireless telecommunications tower with associated remote equipment does not require or would not result in the relocation or construction of a new expanded water, wastewater treatment or stormwater drainage, electric power, natural gas or telecommunications facilities, the construction of which could cause significant environmental effects. On May 2, 2024, ICPDS received a comment letter from the Imperial Irrigation District[13] advising if the proposed communication tower would require electrical service, to contact them to initiate the customer service application process. Additionally, the project's plans are to be submitted to IID. Moreover, any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape, and all water, sewer, storm water, or any other above ground or underground utilities, will require an encroachment agreement. Subsequently, the applicant may not use IID's canal or drain banks to access the project site. Any abandonment of easements or facilities will be approved by IID based on systems (irrigation, drainage, power, etc.). Adherence to IID's recommendations and requirements would bring any impact to less than significant.

b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

b) The proposed project is for the construction and erection of a wireless telecommunications tower with associated remote equipment which does not anticipate the use of a water supply nor a change to the existing use on the parcel; therefore, any impacts are expected to be less than significant.

[25] California Historic Resources in the Imperial County https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

c) The proposed project does not anticipate any impacts to wastewater as it does not propose to generate any wastewater; therefore, any impacts are expected to be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

d) The proposed project does not anticipate an excess generation of solid waste. Less than significant impacts are expected.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

e) All proposed projects within the County shall contract with a licensed waste hauler for waste generated by the facility. Should any solid waste generation is to be proposed in the near future, the proposed telecommunications tower shall comply with federal, state, and local management and reduction statutes and regulations related to solid waste if any to be generated on a later time. Any impacts are expected to be less than significant.

XX. *WILDFIRE*

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

a) As previously stated under item (IX)(f) – "Hazards and Hazardous Materials" above, the proposed telecommunications tower would not substantially impair an adopted emergency response plan or emergency evacuation plan. The applicant would meet and adhere to any requirements set forth by the Imperial County Fire/OES Department. Compliance with the Imperial County Fire Department (ICFD) standards and requirements would bring any impact to less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

b) According to CalFire, the proposed project site is designated as "Local Responsibility Area (LRA) Unzoned"[21]. Also, per Imperial County's Seismic and Public Safety Element[16], Figure 6 – "Fire Hazard Severity Zones", the proposed project site is not located within a fire hazard zone. Additionally, as previously stated on section (IX)(g) above, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned and not located within a Fire Hazard Severity Zone (VHFHZ). Furthermore, as previously stated on section (IX)(f), the applicant would meet and adhere to ICFD's standards, requirements, and recommendations; therefore, impacts due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire are expected to be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

c) As previously stated under item (XV)(a)(1) – "Public Services" above, the project design may be required to install the appropriate infrastructure such as a private or a public source of water for fire suppression purposes such as pressurized hydrants. Adherence and compliance with Imperial County Fire Department requirements will bring any impacts to less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

d) As previously stated on item (VII)(a)(4) above, per Imperial County General Plan's Seismic and Public Safety Element[16], "Landslide Activity Map"-Figure 2, the proposed project is not located within a landslide activity area. The topography within the proposed project site is generally flat. Development, proposed project design and subsequent construction will be subjected to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to the California Building Code standards and regulations would bring any impact

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	Potentially Significant Impact **(PSI)**	Less Than Significant with Mitigation Incorporated **(LTSWMI)**	Less Than Significant Impact **(LTSI)**	No Impact **(NI)**

to less than significant levels.

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

Revised 2009- CEQA
Revised 2011- ICPDS
Revised 2016 – ICPDS
Revised 2017 – ICPDS
Revised 2019 – ICPDS

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.

a) **Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, eliminate tribal cultural resources or eliminate important examples of the major periods of California history or prehistory?**	☐	☐	☑	☐
b) **Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)**	☐	☐	☑	☐
c) **Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☐	☑	☐

IV. PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office
- County Executive Office

B. OTHER AGENCIES/ORGANIZATIONS

- Quechan Indian Tribe
- California Department of Transportation (Caltrans)
- Imperial Irrigation District
- Imperial Valley Emergency Communications Authority (IVECA)

(Written or oral comments received on the checklist prior to circulation)

V. REFERENCES

1. Imperial County General Plan: Circulation and Scenic Highway Element
   https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf
2. California State Scenic Highway System Map
   https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa
3. California Important Farmland Finder: Imperial County 2020
   https://maps.conservation.ca.gov/DLRP/CIFF/
4. California Williamson Act Enrollment Finder
   https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html
5. Imperial County General Plan Land Use Map
   https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=078e1e32c6dc4223ba8c7d69d7c6c383
6. Imperial County Air Pollution Control District comment letter dated May 13, 2025
7. Imperial County General Plan: Conservation and Open Space Element
   https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf
   a) Figure 1: Sensitive Habitat Map
   b) Figure 2: Sensitive Species Map
   c) Figure 3: Agency-Designated Habitats Map
   d) Figure 5: Areas of Heighten Historic Period Sensitivity Map
   e) Figure 6: Known Areas of Native American Cultural Sensitivity Map
   f) Figure 8: Existing Mineral Resources Map
8. California Department of Fish and Wildlife Burrowing Owl Predicted Habitat
   https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25
9. U.S. Fish and Wildlife Service, Recommended Best Practices for Communication Tower: Design, Sitting, Construction, Operation, Maintenance, and Decommissioning
   https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation
10. National Wetlands Inventory Map: Surface Waters and Wetlands
    https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
11. National Water Information System: Mapper
    https://maps.waterdata.usgs.gov/mapper/index.html
12. California Sustainable Groundwater Management Act (SGMA) Data Viewer
    https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions
13. Imperial Irrigation District comment letter dated May 2, 2025
14. California Department of Conservation: Fault Activity Map
    https://maps.conservation.ca.gov/cgs/fam/
15. United States Geological Survey's Quaternary Faults Map
    https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf
16. Imperial County General Plan: Seismic and Public Safety Element
    https://www.icpds.com/planning/land-use-documents/general-plan/seismic-and-public-safety
17. California Tsunami Data Maps
    https://www.conservation.ca.gov/cgs/tsunami/maps
18. United States Department of Agriculture- Natural Resources Conservation Service: Soils Map
    https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
19. California Department of Toxic Substances Control: EnviroStor
    https://www.envirostor.dtsc.ca.gov/public/
20. Imperial County Airport Land Use Compatibility Maps
    https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411
21. CalFire: Fire Hazard Severity Zones in Local Responsibility Areas – Imperial County Map
    https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map

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2022/fire-hazard-severity-zone-maps---lra/imperial_lra_draft_fhszl06_1_map13.pdf?rev=ae37a06cab87486b8814874bfa7cfb16&hash=4B1355741F43E2EE3852E0A4A20DE497

22. Federal Emergency Management Agency (FEMA) Flood Map Service Center: Flood Insurance Rate Map https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor
23. Imperial County General Plan: Noise Element https://www.icpds.com/assets/planning/noise-element-2015.pdf
24. Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/
25. California Historic Resources: Imperial County https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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VI. NEGATIVE DECLARATION – County of Imperial

The following Negative Declaration is being circulated for public review in accordance with the California Environmental Quality Act Section 21091 and 21092 of the Public Resources Code.

Project Name: Conditional Use Permit (CUP) #25-0004 / Variance #25-0001 / Initial Study #25-0012

Project Applicant: VB BTS III, LLC

Project Location: 1734 E Underwood Rd, Holtville, CA 92250

Description of Project: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 130-foot unmanned monopole tower on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

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VII. FINDINGS

This is to advise that the County of Imperial, acting as the lead agency, has conducted an Initial Study to determine if the project may have a significant effect on the environment and is proposing this Negative Declaration based upon the following findings:

☑ The Initial Study shows that there is no substantial evidence that the project may have a significant effect on the environment and a NEGATIVE DECLARATION will be prepared.

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

If adopted, the Negative Declaration means that an Environmental Impact Report will not be required. Reasons to support this finding are included in the attached Initial Study. The project file and all related documents are available for review at the County of Imperial, Planning & Development Services Department, 801 Main Street, El Centro, CA 92243 (442) 265-1736.

NOTICE

The public is invited to comment on the proposed Negative Declaration during the review period.

7-24-2025 for Mich. Minn
Date of Determination Jim Minnick, Director of Planning & Development Services

The Applicant hereby acknowledges and accepts the results of the Environmental Evaluation Committee (EEC) and hereby agrees to implement all Mitigation Measures, if applicable, as outlined in the MMRP.

Applicant Signature 7/24/2025
Date

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SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

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IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

COMMENT LETTERS

EEC ORIGINAL PKG

COUNTY OF IMPERIAL
DEPARTMENT OF PUBLIC WORKS
155 S. 11th Street
El Centro, CA 92243
Tel: (442) 265-1818
Fax: (442) 265-1858
Follow Us:
www.facebook.com/ImperialCountyDPW/
https://twitter.com/CountyDpw/

Public Works works for the Public

ICDPW

June 6, 2025

Mr. Jim Minnick, Director
Planning & Development Services Department
801 Main Street
El Centro, CA 92243

RECEIVED
By Imperial County Plannning & Development Services at 4:42 pm, Jun 11, 2025

Attention: Luis Bejarano, Planner I

SUBJECT: **CUP 25-0004 VB BTS III, LLC**
Located on 1734 Underwood Road, Holtville, CA 92250
APN 045-600-017

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on April 30, 2025, for the above-mentioned project. The applicant proposes to install a 120-foot monopole tower as part of a new unmanned wireless communications facility.

Our Department staff has reviewed the package information, and ***all the following comments shall be Conditions of Approval as described***:

1. A comprehensive Drainage and Grading Letter accompanied by exhibit that clearly illustrates the proposed property grading, including existing and proposed contours and elevations. This needs to be prepared by a California Licensed Civil Engineer and is required to provide for property grading and drainage control and prevent damage to adjacent properties.

2. Prior the final closing for Planning's Division Building Permit, **a Drainage/Grading certification letter** along with pictures shall be provided by a Civil Engineer or Surveyor that recommended grading and drainage controls were completed per the accepted drainage and grading letter.

3. A Concrete driveway shall be installed from Thielsen Rd existing edge of pavement to County Right-of-Way per ***Dwg. No. 410D-1&2 shall*** be installed (per Section 12.10.020 – Street Improvement Requirements of Imperial County Ordinance.

4. An Encroachment Permit will be required for installing the driveway, temporary traffic control devices, and any activities with County of Imperial Right-of-Way.

INFORMATIVE

- Temporary traffic control devices and plan will be required for any activities within the County of Imperial Right-of-Way (construction, staging of equipment, etc.).

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- A Transportation Permit may be required from road agency(s) for any hauls of heavy equipment and/or large vehicles which impose greater than legal loads.

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

Respectfully,

John A. Gay, PE
Director of Public Works

By:
Atondo V.
Veronica Atondo, PE, PLS
Deputy Director of Public Works - Engineering

EEC ORIGINAL PKG

Luis Bejarano

From: Margo Sanchez
Sent: Monday, May 5, 2025 11:52 AM
To: Aimee Trujillo; ICPDSCommentLetters; Luis Bejarano
Subject: RE: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good morning,

The Agricultural Commissioner's Office has No Comment for this project.

Best regards,
Margo

Margo Sanchez
Deputy Agricultural Commissioner
Deputy Sealer of Weights & Measures
Special Projects / Weights & Measures Division
Imperial County
442.265.1500
7-4:30pm / Off rotating Fridays
agcom.imperialcounty.org

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com; becky@holtvillechamber.org; rosie@holtvillechamber.org; nwells@holtville.ca.gov; achavez@holtville.ca.gov; jeorge@theholtgroup.net; asilva@holtville.ca.gov; celso@husd.net; marcuscuero@campo-nsn.gov; dtsosie@campo-nsn.gov; historicpreservation@quechantribe.com; tribalsecretary@quechantribe.com; byronfrontier@yahoo.com; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good afternoon,

EEC ORIGINAL PKG

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

In an effort to increase the efficiency at which information is distributed and reduce paper usage, the Request for Comments packet is being sent to you via this email.

Should you have any questions, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

EEC ORIGINAL PKG

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

RECEIVED
By Imperial County Planning & Development Services at 7:26 am, May 13, 2025

May 13, 2025

Mr. Jim Minnick
Planning & Development Services Director
801 Main St.
El Centro, CA 92243

SUBJECT: Conditional Use Permit 25-0004 / Variance 25-0001 for VB BTS III, LLC

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review the application for Conditional Use Permit 25-0004 to install a 120-foot monopole tower as part of a new wireless communications facility located at 1734 Underwood Road in Holtville, California, also described as Assessor's Parcel Number 045-600-017-000. Variance 25-0001 is required to exceed the 60-foot height limitation for the A-1 zone (Limited Agriculture) use.

The applicant must adhere to Air District Regulation VIII which is a set of rules designed to limit emissions of fugitive dust to no more than 20% opacity during construction and operation. Specifically, Rule 801-Construction and Earthmoving Activities, and Rule 805-Paved and Unpaved Roads, since this project plans construction of a new 30-foot access road.

Although the planned footprint of the facility is 1,600 square feet, the total lot acreage listed in the project packet is identified as 5.51 acres. If the construction footprint (including staging area) of the project exceeds 5 acres, a Construction Dust Control Plan must be filed with the Air District. A Construction Notification must be filed with the Air District 10 days prior to the commencement of construction (earthmoving activities).

Project plans include a back-up diesel generator. Generators exceeding 50 horsepower require a permit from the Air District. The applicant should contact the Permitting & Engineering Division of the Air District to confirm if a permit is required.

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The Air District's rule book can be accessed via the internet at https://apcd.imperialcounty.org/rules-and-regulations/. Should you have questions, please call our office at (442) 265-1800.

Sincerely,

Curtis Blondell

Curtis Blondell
APC Environmental Coordinator

Reviewed by,
Monica N. Soucier
APC Division Manager

EEC ORIGINAL PKG

Luis Bejarano

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Wednesday, April 30, 2025 3:10 PM
To: Aimee Trujillo; ICPDSCommentLetters
Subject: Re: [EXTERNAL]:CUP25-0004/V25-0001/IS25-0012 Request for Comments

CAUTION: This email originated outside our organization; please use caution.

Good afternoon,
This email is to inform you that the Historic Preservation Office does not wish to comment on this project.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com <dvargas@iid.com>; becky@holtvillechamber.org <becky@holtvillechamber.org>; rosie@holtvillechamber.org <rosie@holtvillechamber.org>; nwells@holtville.ca.gov

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<nwells@holtville.ca.gov>; achavez@holtville.ca.gov <achavez@holtville.ca.gov>; jeorge@theholtgroup.net <jeorge@theholtgroup.net>; asilva@holtville.ca.gov <asilva@holtville.ca.gov>; celso@husd.net <celso@husd.net>; marcuscuero@campo-nsn.gov <marcuscuero@campo-nsn.gov>; dtsosie@campo-nsn.gov <dtsosie@campo-nsn.gov>; Jill Mccormick <historicpreservation@quechantribe.com>; Tribal Secretary <tribalsecretary@quechantribe.com>; byronfrontier@yahoo.com <byronfrontier@yahoo.com>; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: [EXTERNAL]:CUP25-0004/V25-0001/IS25-0012 Request for Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

In an effort to increase the efficiency at which information is distributed and reduce paper usage, the Request for Comments packet is being sent to you via this email.

Should you have any questions, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

EEC ORIGINAL PKG

Luis Bejarano

From: Daniel Tsosie <dtsosie@campo-nsn.gov>
Sent: Saturday, May 17, 2025 12:25 AM
To: Aimee Trujillo
Subject: Re: CUP25-0004/V25-0001/IS25-0012 Request for Comments

CAUTION: This email originated outside our organization; please use caution.

Hello. Aimee, after review, on behalf on Campo Band of Mission Indians, we do have concerns and interests due to Tribal knowledge of the Tribal and Cultural affiliated area of the project and due to other sensitive areas adjacent to the proposed project. We Campo would like to be involved with our monitoring team, and provide mitigation, monitoring/discovery planning.

Best regards,

DANIEL TSOSIE
Campo Band of Mission Indians
Cultural Resource Manager

Vice-Chairman- Kumeyaay Heritage Preservation Council
Secretary- Kumeyaay Diegueño Land Conservancy
Campo Band OMI KCRC representative

C: 619-760-6480
O: 619-478-9046 Ext. 278

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45:16 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com <dvargas@iid.com>; becky@holtvillechamber.org <becky@holtvillechamber.org>; rosie@holtvillechamber.org <rosie@holtvillechamber.org>; nwells@holtville.ca.gov <nwells@holtville.ca.gov>; achavez@holtville.ca.gov <achavez@holtville.ca.gov>; jeorge@theholtgroup.net <jeorge@theholtgroup.net>; asilva@holtville.ca.gov <asilva@holtville.ca.gov>; celso@husd.net <celso@husd.net>;

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Marcus Cuero <marcuscuero@campo-nsn.gov>; Daniel Tsosie <dtsosie@campo-nsn.gov>; historicpreservation@quechantribe.com <historicpreservation@quechantribe.com>; tribalsecretary@quechantribe.com <tribalsecretary@quechantribe.com>; byronfrontier@yahoo.com <byronfrontier@yahoo.com>; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good afternoon,

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

In an effort to increase the efficiency at which information is distributed and reduce paper usage, the Request for Comments packet is being sent to you via this email.

Should you have any questions, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

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IID
A century of service.
www.iid.com
Since 1911

RECEIVED
By Imperial County Planning & Development Services at 11:09 am, May 02, 2025

May 2, 2025

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: 120 ft. Monopole Tower Project; CUP25-0004/V25-0001/IS25-0012

Dear Mr. Bejarano:

On April 30, 2025, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the installation of a 120 ft. monopole tower project; Conditional Use Permit No. 25-0004, Variance No. 25-0001, Initial Study No. 25-0012. The applicant proposes to install a 120 ft. monopole as part of an unmanned wireless communication facility within a 1,660 sq. ft. fenced area located at 1734 Underwood Road, Holtville, CA (APN 045-570-088-000).

The IID has reviewed the application and has the following comments:

1. If the project requires electrical service, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com, to initiate the customer service application process. In addition to submitting a formal application (available for download at http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project.

2. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.

3. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary

EEC ORIGINAL PKG

to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.

4. The project proponent will be required to provide and bear all costs associated with acquisition of land, rights of way, easements, and infrastructure relocations and realignments deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.

5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.

6. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). A copy of the IID encroachment permit application and instructions for its completion are available at the website https://www.iid.com/about-iid/department-directory/real-estate. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.

7. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (NEPA) documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or modification of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully analyzed. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.

8. When the project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, to determine if the project would

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require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

Should you have any questions, please do not hesitate to contact me at 760-482-3609 or at dvargas@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Joanna Smith-Hoff – Deputy General Counsel
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

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ALUC LETTER OF DETERMINATION /

ALUC PACKAGE

EEC ORIGINAL PKG

Imperial County Planning & Development Services
Planning / Building

July 03, 2025

Jim Minnick
DIRECTOR

VB BTS II, LLC
Samantha Herrmann
1499 Huntington Dr, Ste 305,
South Pasadena, CA 91030

SUBJECT: **Airport Land Use Commission Determination for Vertical Bridge Tower (CUP#25-0004/V#25-0001)**

Dear Applicant:

The Airport Land Use Commission (ALUC) on June 18, 2025, reviewed the request made by VB BTS II, LLC for the proposed installation of a 120-foot lattice communication tower with a ten-foot lightning rod for a total height of 130-feet located at 1734 E Underwood Rd, Holtville, CA. The applicant requested a review by the Commission for a determination of the consistency or inconsistency with the 1996 Airport Land Use Compatibility Plan (ALUCP).

After conducting a public hearing, and hearing all the opponents and proponents of the proposed monopole, the Commission found it consistent with the 1996 Airport Land Use Compatibility Plan (ALUCP).

If you should you have any questions, please contact Luis Bejarano, Planner II, at (442) 265-1736, extension 1745 or via email at luisbejarano@co.imperial.ca.us.

Sincerely,

JIM MINNICK
ALUC Secretary

By: _____
Luis Bejarano, Planner II

CC: Melissa Keith, mkeith@assurance-group.com
Samantha Herrmann, sherrmann@assurance-group.com
Jim Minnick, Planning & Dev. Services Director
Michael Abraham, AICP, Assistant ICPDS Director
Diana Robinson, Planning Manager
Luis Bejarano, Planner II
LB\OL\S:\AllUsers\APN\045\600\017\CUP25-0004_V25-0001_IS25-0012\ALUC\CUP25-0004 ALUC Determination Ltr.docx

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Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

TO: Commissioner Mike Goodsell
Commissioner Tairu Zong
Commissioner Sylvia Chavez
Commissioner Jerry Arguelles

FROM: Jim Minnick, Secretary
Planning & Development Services Director

SUBJECT: Public Hearing for the consideration of a proposed 120-foot wireless communication facility (Conditional Use Permit #25-0004 & V #25-0001) located at 1734 Underwood Road, Holtville, CA 92250 (APN 045-600-017-000; Latitude 32°49' 16.0176" N – Longitude 115° 23' 9.1932" W) to determine Consistency with the Airport Land Use Compatibility Plan (ALUCP). [Luis Bejarano, Planner II] (**ALUC 06-25**)

DATE OF REPORT: June 18, 2025

AGENDA ITEM NO: 3

HEARING DATE: June 18, 2025

HEARING TIME: 6:00 p.m.

HEARING LOCATION: County Administration Center
Board of Supervisors Chambers
940 Main Street
El Centro, CA 92243

STAFF RECOMMENDATION

It is the Staff's recommendation that the Airport Land Use Commission finds the proposed 120-foot wireless communication facility, located at 1734 Underwood Road, Holtville, CA 92250 be consistent with the 1996 Airport Land Use Compatibility Plan.

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SECRETARY'S REPORT

Project Location:

The proposed wireless communication facility will be located at 1734 Underwood Road, Holtville, CA 92250. The property is identified as Assessor's Parcel Number (APN) 045-600-017-000 and is further identified as BLK 65 & W2 OF VAC ST ADJ TSTE TR 87 15-15 5.51AC; Section 7, Township 16 South, Range 14 East, S.B.B.M., Latitude 32°49' 16.0176" N – Longitude 115°23' 9.1932" W.

Project Description:

The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP#25-0004) and a Variance (V#25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 60 feet.

The proposed facility is designed to house the equipment necessary to fill a significant gap in T-Mobile's 5G and 4G LTE coverage. The tower will contain T-Mobile equipment (up to 12 panel antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment). The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future collocators has been made available on the tower as encouraged under Title 9, Division 24.

The ground equipment will also be contained within the fenced area, including two (2) ground-mounted radio cabinets, one (1) back-up diesel generator and an ice bridge from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas. Access to the lease area is being proposed to be a 30 ft long and 12 ft wide graveled road.

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area. The proposed utility route is shown on Attachment 8, sheets A1 and A2 from the application package.

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General Plan/ALUCP Analysis:

The proposed wireless communication facility is located within a parcel owned by Jesus Diaz Gonzales and is not located near any County Public Airport or airstrip. The nearest airport is the Holtville Airport, located approximately six (6) miles east of the proposed project site.

The project site is zoned A-1 (Light Agriculture) per Zoning Map #4 of the Imperial County Title 9 Land Use Ordinance.

The Airport Land Use Compatibility Plan (ALUCP), Chapter 2, Policies, Section 2.3, provides "Types of Actions Reviewed" by the Commission, which shall include:

> "Any request for variance from a local agency's height limitation ordinance; and any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities" (Section 2.3.3(c)(h), pg. 2-3 & 2-4)

The proposed Variance (V#25-0001) and Conditional Use Permit (CUP#25-0004) have been submitted for the Airport Land Use Commission's review and determination of consistency with the 1996 Airport Land Use Compatibility Plan (ALUCP) due to the nature of the application (a 120-foot wireless communication facility).

ATTACHMENTS:

A. Vicinity Map
B. ALUC Map
C. Assessor's Plat Map
D. Site Plan
E. Application & Supporting Documents
F. ALUCP Section

LB\S:\AllUsers\APN\045\600\017\CUP25-0004_V25-0001_IS25-0012\ALUC\STAFF REPORT\CUP25-0004_V25-0001 ALUC Staff Report.doc

EEC ORIGINAL PKG

ATTACHMENT "A" - VICINITY MAP

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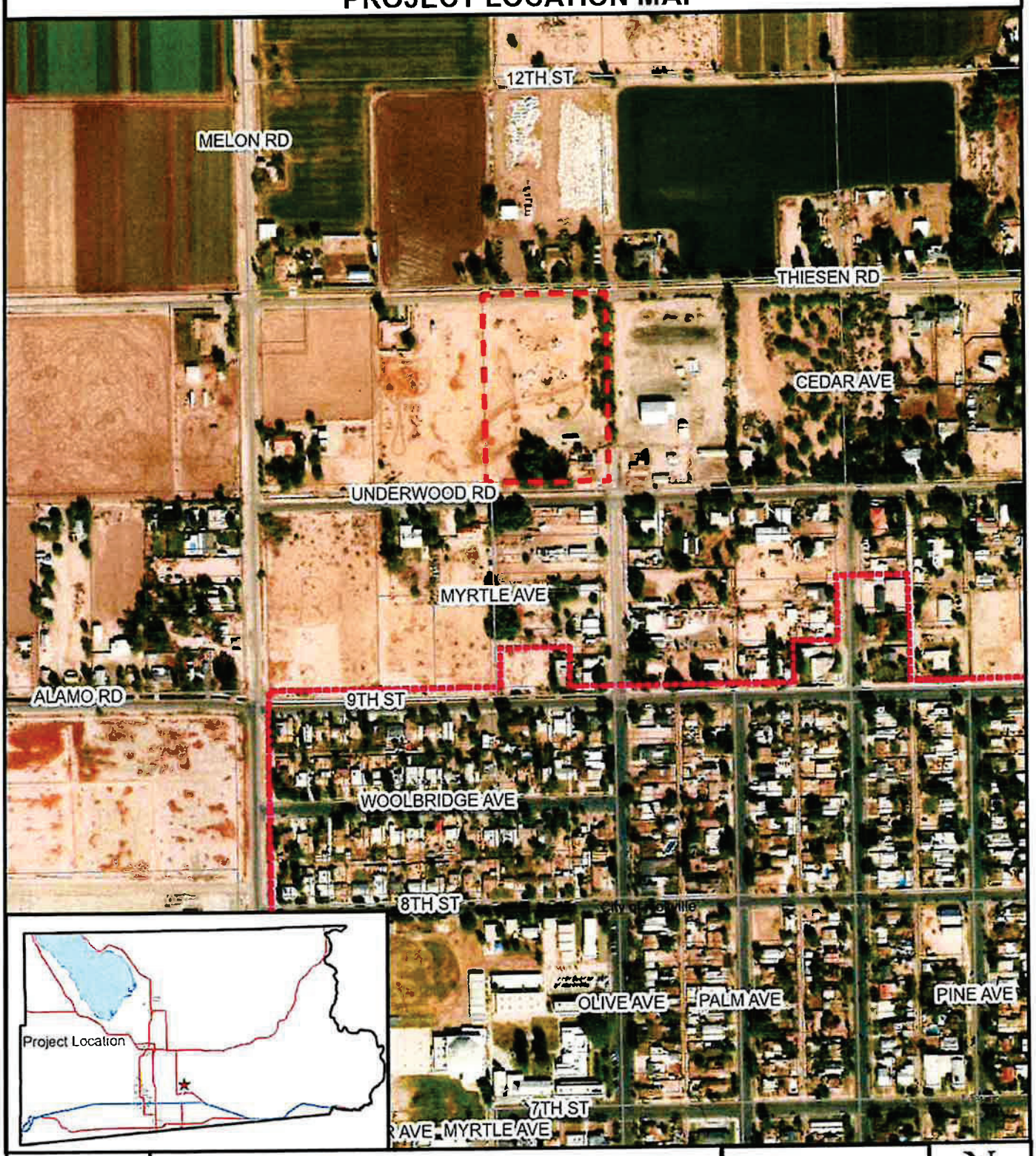
PROJECT LOCATION MAP



VB BTS III, LLC
CUP #25-0004
V #25-0001
IS #25-0012
APN 045-600-017-000

Project Location
Centerline
City Limit
Parcels

N

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ATTACHMENT "B" – ALUC MAP

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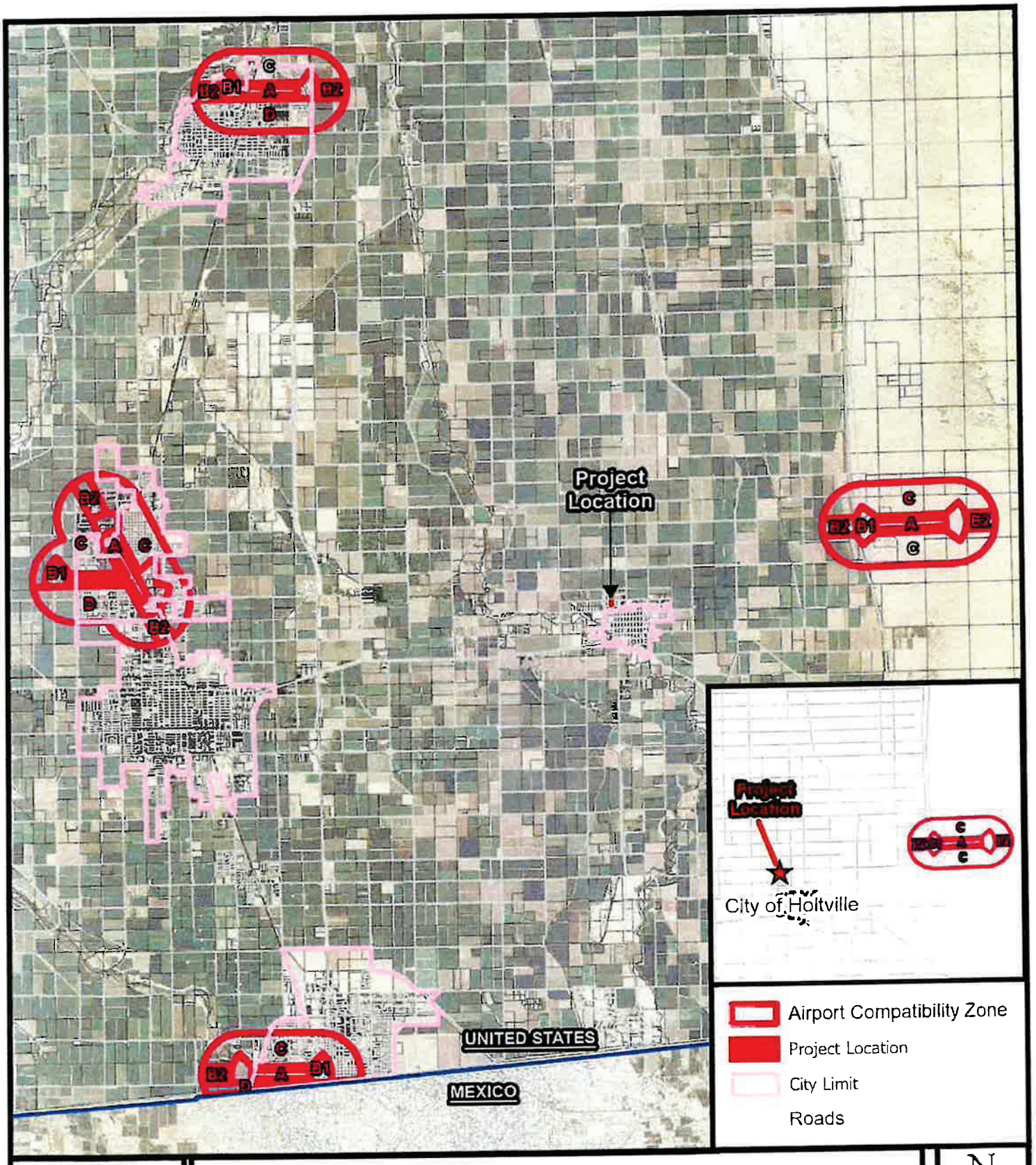

VB BTS III, LLC
CUP #25-0004
V #25-0001
IS #25-0012
APN #045-600-017-000

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ATTACHMENT "C" – ASSESSOR'S PLAT MAP

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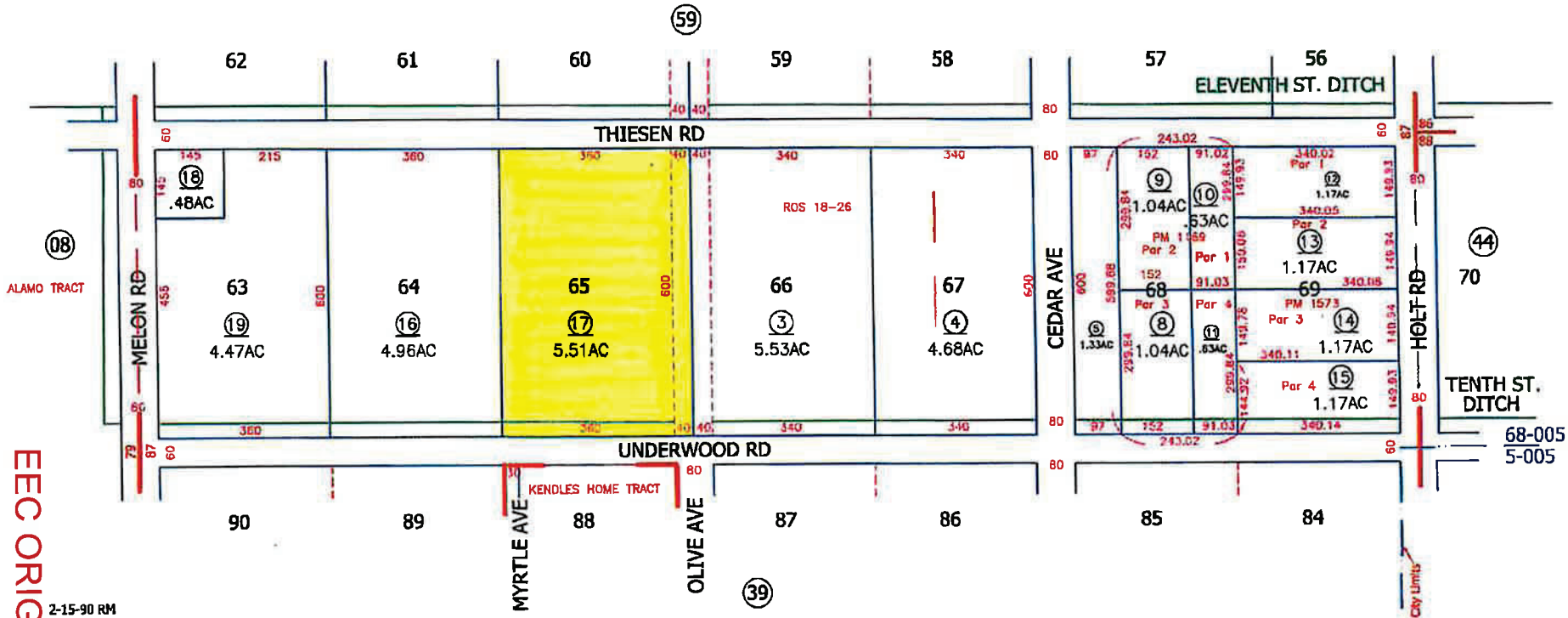
BLKS 63 thru 69 INCL TOWNSITE OF HOLTVILLE (OUTSIDE)

POR TRACT 87 T15S, R15E

O.M. 1-12

Tax Area Code
68-005

45-60



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2-15-90 RM
4-11-89 RM
2-2-88 LS
4-27-84 LS
BLOW-UP
From 45-09
5-19-77 DM
RETRACE
1-26-79 LS

3-4-13 MF
9-27-12 MF

DISCLAIMER:
THIS IS NOT AN OFFICIAL MAP.
THIS MAP WAS CREATED FOR THE IMPERIAL COUNTY ASSESSOR, FOR THE SOLE PURPOSE OF AIDING IN THE PERFORMANCE OF THE DUTIES OF THE ASSESSOR. ANY ERRORS OR OMISSIONS IN THIS MAP ARE NOT THE RESPONSIBILITY OF THE COUNTY OF IMPERIAL OR THE ASSESSOR. (REV. & TAX. CODE SEC.327)

Assessor's Map Bk.45-Pg.60
County of Imperial, Calif.

ATTACHMENT "D" – SITE PLAN

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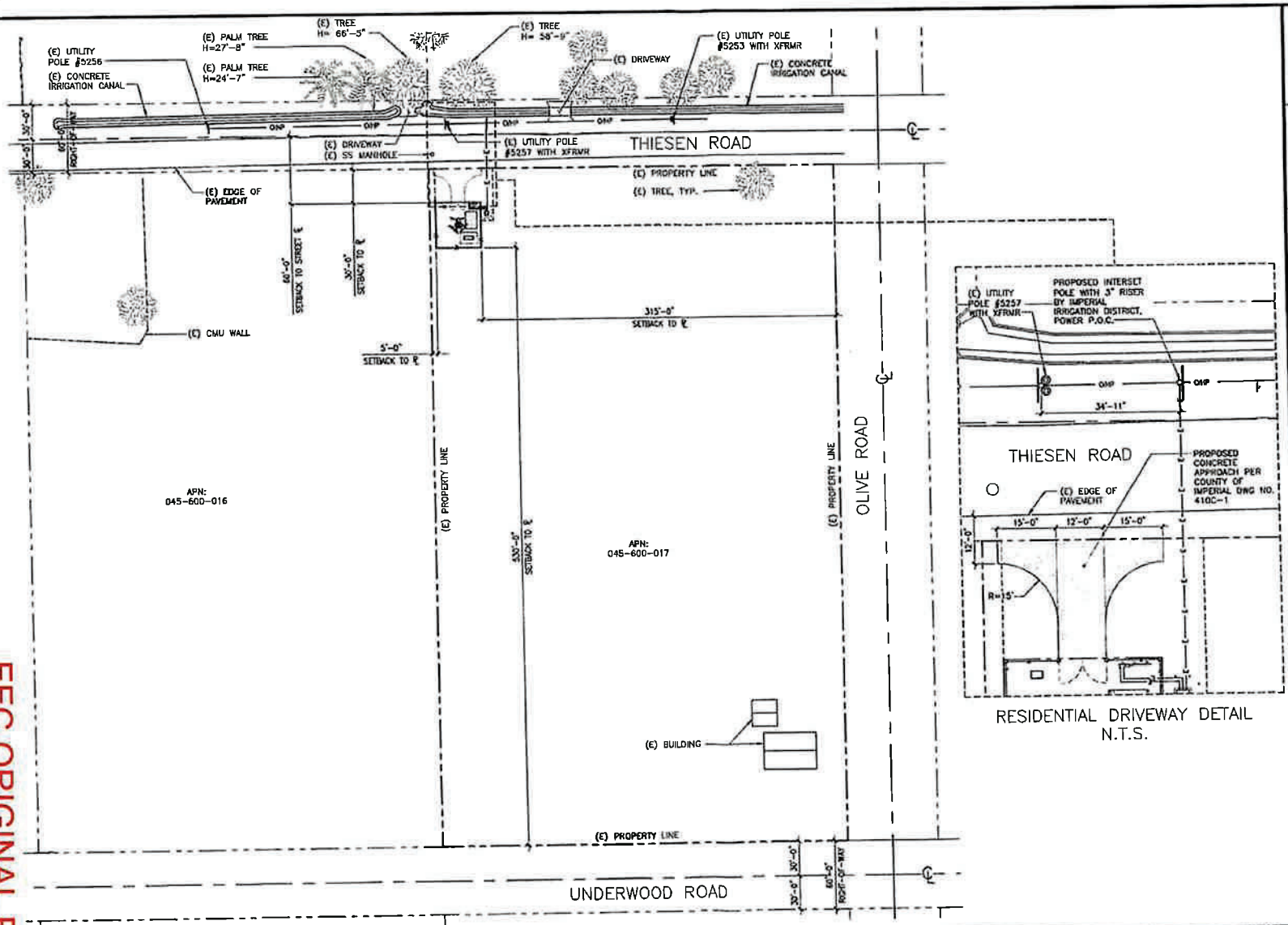


RESIDENTIAL DRIVEWAY DETAIL
N.T.S.

EEC ORIGINAL PKG

SITE PLAN

CLIENT

verticalbridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561 949 6367

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5079

NO	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	JR	05/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE
SITE PLAN

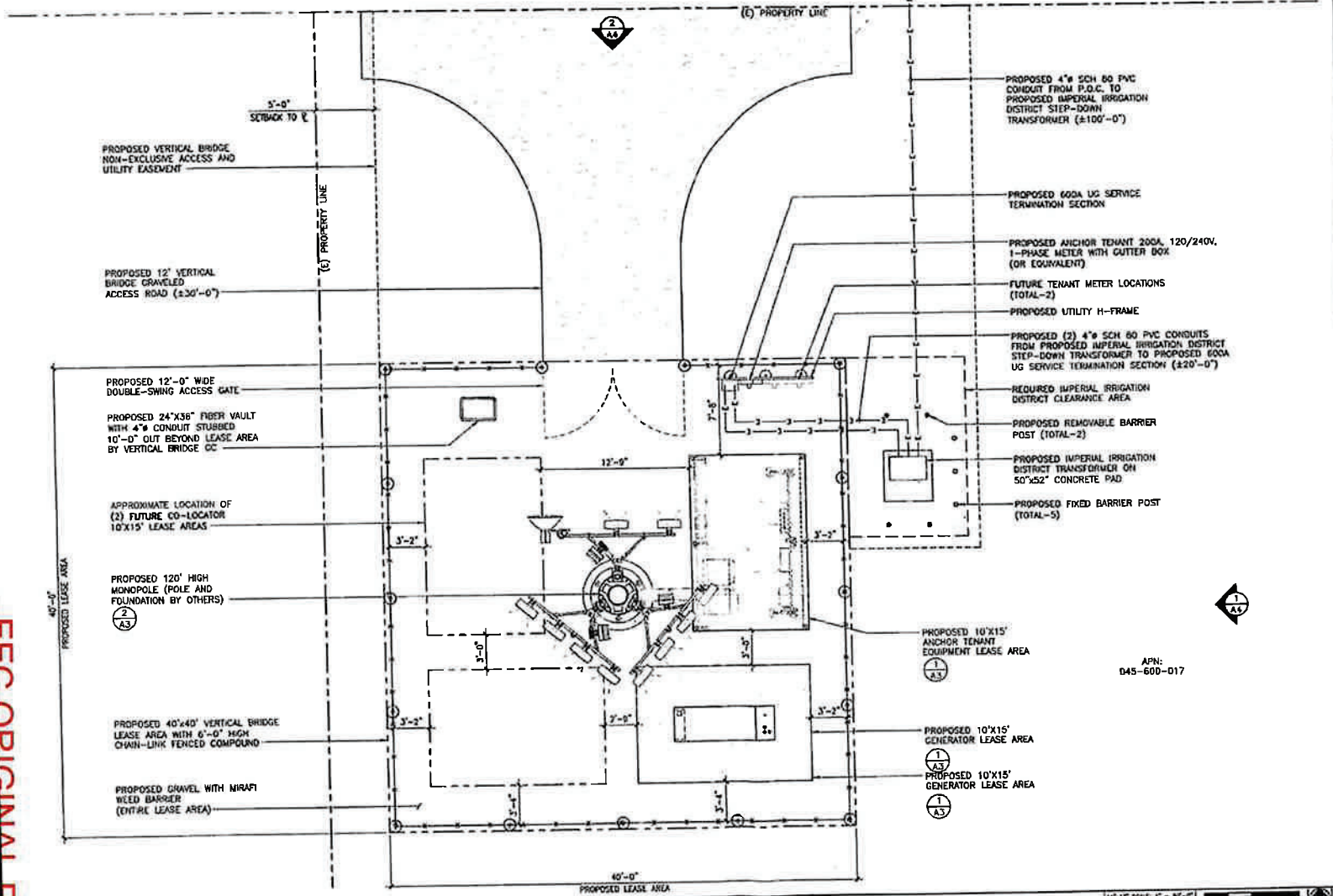
DRAWING SCALE:
AS NOTED
DATE:
08/16/24

ZD

UNAUTHORIZED ALTERATION OR ADDITION TO THIS DOCUMENT IS A VIOLATION OF APPLICABLE STATE AND/OR LOCAL LAWS.

DRAWING NUMBER
A1

11"x17" SCALE: 1" = 80'-0"
24"x36" SCALE: 1" = 40'-0"
0 20' 40' 80'
1



ENLARGED COMPOUND PLAN

EEC ORIGINAL PKG

CLIENT

verticalbridge

750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8307

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5070

NO	SUBMITTAL / REVISION	BY	DATE
3	ISSUED FOR ZONING	JR	09/30/21
A	ISSUED FOR REVIEW	CV	09/16/21

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE:
ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED
DATE: 09/16/21
ZD

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DRAWING NUMBER:
A2

ATTACHMENT "F" – ALUCP SECTION

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Policies

1.SCOPE OF REVIEW

1. Geographic Area of Concern

The Imperial County Airport Land Use Commission's planning area encompasses:

1. *Airport Vicinity* - All lands on which the uses could be negatively affected by present or future aircraft operations at the following airports in the County and lands on which the uses could negatively affect said airports. The specific limits of the planning area for each airport are depicted on the respective *Compatibility Map* for that airport as presented in Chapter 3.

   (a) Brawley Municipal Airport.

   (b) Calexico International Airport.

   (c) Calipatria Municipal Airport.

   (d) Holtville Airport.

   (e) Imperial County Airport.

   (f) Salton Sea Airport.

   (g) Naval Air Facility El Centro.

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2. *Countywide Impacts on Flight Safety* - Those lands, regardless of their location in the County, on which the uses could adversely affect the safety of flight in the County. The specific uses of concern are identified in Paragraph 2.

3. *New Airports and Heliports* - The site and environs of any proposed new airport or heliport anywhere in the County. The Brawley Pioneers Memorial Hospital has a heliport area on-site.

2. Types of Airport Impacts

The Commission is concerned only with the potential impacts related to aircraft noise, land use safety (with respect both to people on the ground and the occupants of aircraft), airspace protection, and aircraft overflights. Other impacts sometimes created by airports (e.g., air pollution, automobile traffic, etc.) are beyond the scope of this plan. These impacts are within the authority of other local, state, and federal agencies and are addressed within the environmental review procedures for airport development.

3. Types of Actions Reviewed

1. *General Plan Consistency Review* - Within 180 days of adoption of the *Airport Land Use Compatibility Plan*, the Commission shall review the general plans and specific plans of affected local jurisdictions to determine their consistency with the Commission's policies. Until such time as (1) the Commission finds that the local general plan or specific plan is consistent with the *Airport Land Use Compatibility Plan*, or (2) the local agency has overruled the Commission's determination of inconsistency, the local jurisdiction shall refer all actions, regulations, and permits (as specified in Paragraph 3) involving the airport area of influence to the Commission for review (Section 21676.5 (a)).

2. *Statutory Requirements* - As required by state law, the following types of actions shall be referred to the Airport Land Use Commission for determination of consistency with the Commission's plan *prior to their approval* by the local jurisdiction:

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(a) The adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676 (b)).

(b) The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impact concerns listed in Paragraph 2 (Section 21676 (b)).

(c) Adoption or modification of the master plan for an existing public-use airport (Section 21676 (c)).

(d) Any proposal for a new airport or heliport whether for public use or private use (Section 21661.5).

3. *Other Project Review* - State law empowers the Commission to review additional types of land use "actions, regulations, and permits" involving a question of airport/land use compatibility if either: (1) the Commission and the local agency agree that these types of individual projects shall be reviewed by the Commission (Section 21676.5 (b)); or (2) the Commission finds that a local agency has not revised its general plan or specific plan or overruled the Commission and the Commission requires that the individual projects be submitted for review (Section 21676.5 (a)). For the purposes of this plan, the specific types of "actions, regulations, and permits" which the Commission shall review include:

a) Any proposed expansion of a city's sphere of influence within an airport's planning area.

b) Any proposed residential planned unit development consisting of five or more dwelling units within an airport's planning area.

c) Any request for variance from a local agency's height limitation ordinance.

d) Any proposal for construction or alteration of a structure (including antennas) taller than 150 feet above the ground anywhere within the County.

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e) Any major capital improvements (e.g., water, sewer, or roads) that would promote urban development.

f) Proposed land acquisition by a government entity (especially, acquisition of a school site).

g) Building permit applications for projects having a valuation greater than $500,000.

h) Any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities.

4. Review Process

1. *Timing of Project Submittal* - Proposed actions listed in Paragraph 3.1 must be submitted to the Commission for review prior to approval by the local government entity. All projects shall be referred to the Commission at the earliest reasonable point in time so that the Commission's review can be duly considered by the local jurisdiction prior to formalizing its actions. At the local government's discretion, submittal of a project for Airport Land Use Commission review can be done before, after, or concurrently with review by the local planning commission or other local advisory bodies.

2. *Commission Action Choices* - When reviewing a land use project proposal, the Airport Land Use Commission has a choice of either of two actions: (1) find the project *consistent* with the *Airport Land Use Compatibility Plan*; or, (2) find the project *inconsistent* with the Plan. In making a finding of inconsistency, the Commission may note the conditions under which the project would be consistent with the Plan. The Commission cannot, however, find a project consistent with the Plan subject to the inclusion of certain conditions in the project.

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Table 2A

Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

Zone	Location	Impact Elements	Maximum Densities		Required Open Land
			Residential (du/ac)	Other Uses (people/ac)	
A	Runway Protection Zone or within Building Restriction Line	• High risk • High noise levels	0	10	All Remaining
B1	Approach/Departure Zone and Adjacent to Runway	• Substantial risk - aircraft commonly below 400 ft. AGL or within 1,000 ft. of runway • Substantial noise	0.1	100	30%
B2	Extended Approach/Departure Zone	• Significant risk – aircraft commonly below 800 ft. AGL • Significant noise	1	100	30%
C	Common Traffic Pattern	• Limited risk – aircraft at or below 1,000 ft. AGL • Frequent noise intrusion	6	200	15%
D	Other Airport Environs	• Negligible risk • Potential for annoyance from overflights	No Limit	No Limit	No Requirement

Zone	Additional Criteria		Examples	
	Prohibited[4]	Other Development Conditions	Normally Acceptable Uses	Uses Not Normally Acceptable
A	• All structures except ones with location set by aeronautical function • Assemblages of people • Objects exceeding FAR Part 77 height limits • Hazards to flight[5]	• Dedication of avigation easement	• Aircraft tiedown apron • Pastures, field crops, vineyards • Automobile parking	• Heavy poles, signs, large trees, etc.
B1 and B2	• Schools, day care centers, libraries • Hospitals, nursing homes • Highly noise-sensitive uses • Above ground storage • Storage of highly flammable materials • Hazards to flight[5]	• Locate structures maximum distance from extended runway centerline • Minimum NLR[7] of 25 dBA in residential and office buildings • Dedication of avigation easement	• Uses in Zone A • Any agricultural use except ones attracting bird flocks • Warehousing, truck terminals • Single-story offices	• Residential subdivisions • Intensive retail uses • Intensive manufacturing or food processing uses • Multiple story offices • Hotels and motels
C	• Schools • Hospitals, nursing homes • Hazards to flight[5]	• Dedication of overflight easement for residential uses	• Uses in Zone B • Parks, playgrounds • Low-intensity retail, offices, etc. • Low-intensity manufacturing, food processing • Two-story motels	• Large shopping malls • Theaters, auditoriums • Large sports stadiums • Hi-rise office buildings
D	• Hazards to flight[5]	• Deed notice required for residential development	• All except ones hazardous to flight	

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Table 2A Continued
Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

NOTES

1 Residential development should not contain more than the indicated number of dwelling units per gross acre. Clustering of units is encouraged as a means of meeting the Required Open Land requirements.

2 The land use should not attract more than the indicated number of people per acre at any time. This figure should include all individuals who may be on the property (e.g., employees, customers/visitors, etc.). These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses.

3 See Policy 2.5.

4 These uses typically can be designed to meet the density requirements and other development conditions listed.

5 These uses typically do not meet the density and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and no feasible alternative location exists.

6 See Policy 3.4

7 NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure.

BASIS FOR COMPATIBILITY ZONE BOUNDARIES

The following general guidelines are used in establishing the Compatibility Zone boundaries for each civilian airport depicted in Chapter 3. Modifications to the boundaries may be made to reflect specific local conditions such as existing roads, property lines, and land uses. Boundaries for NAF El Centro are modified in recognition of the differences between civilian and military aircraft characteristics and flight tracks.

A The boundary of this zone for each airport is defined by the runway protection zones (formerly called runway clear zones) and the airfield building restriction lines.

Runway protection zone dimensions and locations are set in accordance with Federal Aviation Administration standards for the proposed future runway location, length, width, and approach type as indicated on an approved Airport Layout Plan. If no such plan exists, the existing runway location, length, width, and approach type are used.

The building restriction line location indicated on an approved Airport Layout Plan is used where such plans exist. For airports not having an approved Airport Layout Plan, the zone boundary is set at the following distance laterally from the runway centerline:

Visual runway for small airplanes	370 feet
Visual runway for large airplanes	500 feet
Nonprecision instrument runway for large airplanes	500 feet
Precision instrument runway	750 feet

These distances allow structures up to approximately 35 feet height to remain below the airspace surfaces defined by Federal Aviation Regulations Part 77.

B1 The outer boundary of the Approach/Departure Zone is defined as the area where aircraft are commonly below 400 feet above ground level (AGL). For visual runways, this location encompasses the base leg of the traffic pattern as commonly flown. For instrument runways, the altitudes established by approach procedures are used. Zone B1 also includes areas within 1,000 feet laterally from the runway centerline.

B2 The Extended Approach/Departure Zone includes areas where aircraft are commonly below 800 feet AGL on straight-in approach or straight-out departure. It applies to runways with more than 500 operations per year by large aircraft (over 12,500 pounds maximum gross takeoff weight) and/or runway ends with more than 10,000 total annual takeoffs.

C The outer boundary of the Common Traffic Pattern Zone is defined as the area where aircraft are commonly below 1,000 feet AGL (i.e., the traffic pattern and pattern entry points). This area is considered to extend 5,000 feet laterally from the runway centerline and from 6,000 to 10,000 feet longitudinally from the end of the runway primary surface. The length depends upon the runway classification (visual versus instrument) and the type and volume of aircraft accommodated. For runways having an established traffic solely on one side, the shape of the zone is modified accordingly.

D The outer boundary of the Other Airport Environs Zone conforms with the adopted Planning Area for each airport.

sm/imperit.

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APPLICANT SUBMITTAL

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CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1.	PROPERTY OWNER'S NAME Jesus Diaz Gonzales	EMAIL ADDRESS	
2.	MAILING ADDRESS (Street / P O Box, City, State) 1734 E Underwood Rd, Holtville, CA	ZIP CODE 92250	PHONE NUMBER
3.	APPLICANT'S NAME Samantha Herrmann obo VB BTS II, LLC	EMAIL ADDRESS sherrmann@assurance-group.com	
4.	MAILING ADDRESS (Street / P O Box, City, State) 1499 Huntington Dr. Ste 305, South Pasadena, CA	ZIP CODE 91030	PHONE NUMBER 310 488 6237
4.	ENGINEER'S NAME Johnoah "Bok" Yu CA. LICENSE NO. C-33097	EMAIL ADDRESS	
5.	MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER

6.	ASSESSOR'S PARCEL NO. 045-600-017	SIZE OF PROPERTY (in acres or square foot) 5.51 acres	ZONING (existing) A-1
7.	PROPERTY (site) ADDRESS 1734 E Underwood Rd, Holtville, CA, 92250		
8.	GENERAL LOCATION (i.e. city, town, cross street) Holtville, CA / southwest of intersection of E Thiesen Rd and Olive Rd.		
9.	LEGAL DESCRIPTION		

PLEASE PROVIDE CLEAR & CONCISE INFORMATION (ATTACH SEPARATE SHEET IF NEEDED)

10.	DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	Proposed construction of telecommunications and public utility facility consisting of a 120' monopole with associated equipment.
11.	DESCRIBE CURRENT USE OF PROPERTY	Residential
12.	DESCRIBE PROPOSED SEWER SYSTEM	N/A, no sewer required
13.	DESCRIBE PROPOSED WATER SYSTEM	N/A, no water required
14.	DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	Fire extinguisher on site, further details at Building stage
15.	IS PROPOSED USE A BUSINESS? ☐ Yes ☒ No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE?

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

Jesus Gonzales — 12/13/24
Print Name — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:		DATE	
APPLICATION DEEMED COMPLETE BY:		DATE	
APPLICATION REJECTED BY:		DATE	
TENTATIVE HEARING BY:		DATE	
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	

REVIEW / APPROVAL BY OTHER DEPT'S required
☐ P. W
☐ E. H. S.
☐ A. P. C. D.
☐ O. E. S
☐ _____
☐ _____

CUP # 25-0004

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VARIANCE

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (442) 265-1736

- APPLICANT MUST COMPLETE ALL NUMBERED (black) SPACES – Please type or print -

1. PROPERTY OWNER'S NAME Jesus Diaz Gonzales		EMAIL ADDRESS	
2. MAILING ADDRESS (Street / P O Box, City, State) 1734 E Underwood Rd, Holtville, CA		ZIP CODE 92250	PHONE NUMBER
3. ENGINEERS NAME Johnoah "Bok" Yu	CA. LICENSE NO. C-33097	EMAIL ADDRESS sherrmann@assurance-group.com	
4. MAILING ADDRESS (Street / P O Box, City, State) contact: 1499 Huntington Dr, Ste 305, South Pasadena, CA 91030		ZIP CODE	PHONE NUMBER 310 488 6237

5. ASSESSOR'S PARCEL NO. 045-600-017	ZONING (existing) A-1
6. PROPERTY (site) ADDRESS 1734 E Underwood Rd, Holtville, CA	SIZE OF PROPERTY (in acres or square foot) 5.51 Acres
7. GENERAL LOCATION (i.e. city, town, cross street) Holtville, CA / southwest of intersection of E Thiesen Rd and Olive Rd.	
8. LEGAL DESCRIPTION	

8. DESCRIBE VARIANCE REQUESTED (i.e. side yard set-back reduction, etc.)
Requesting the extended height of the tower, 120' that deviates from the maximum height of 60' in the A-1 zone.

9. DESCRIBE REASON FOR, OR WHY VARIANCE IS NECESSARY : As shown in the propogation maps created by T-Mobile's RF engineers, 120' is the minimum height necessary to meet coverage objectives for this area and community.

10. DESCRIBE THE ADJACENT PROPERTY
- East: Zoning: A-1-U, Vacant/Agricultural Use & Structures
- West: Zoning: A-1-U, Residential/Vacant
- North: Zoning: A-1-U, Residential/Agriculture
- South: Zoning: R-1-U, Residential

I / WE THE LEGAL OWNER (S) OF THE ABOVE PROPERTY CERTIFY THAT THE INFORMATION SHOWN OR STATED HEREIN IS TRUE AND CORRECT.

Jesus Gonzales — Print Name
12/13/24 — Date
Signature

Print Name — Date
Signature

REQUIRED SUPPORT DOCUMENTS

A. SITE PLAN
B. FEE
C. OTHER
D. OTHER

APPLICATION RECEIVED BY:		DATE	REVIEW / APPROVAL BY OTHER DEPT'S required.
APPLICATION DEEMED COMPLETE BY:		DATE	☐ P. W
APPLICATION REJECTED BY:		DATE	☐ E. H. S.
TENTATIVE HEARING BY:		DATE	☐ A. P. C. D.
FINAL ACTION: ☐ APPROVED ☐ DENIED		DATE	☐ O. E. S.
			☐

V # 25-0001

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Attachment 1

Project Narrative

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PROJECT NARRATIVE
WCF REQUEST FOR CONDITIONAL USE PERMIT AND VARIANCE
HOLTVILLE, US-CA-5363

Submitted to Imperial County, California
Planning & Development Services Department

Applicant:
VB BTS III, LLC
Attention: Brandon St.Michel
750 Park Commerce Drive, Suite 200
Boca Raton, FL 33487
(701) 368-9949
Brandon.StMichel@verticalbridge.com

Co-Applicant:
T-Mobile West LLC ("T-Mobile")
Attention: Keisha Robinson
1200 Concord Ave., Suite 500
Concord, CA 94520
Lakeisha.Robinson109@T-Mobile.com

Representative:
Assurance Development
1499 Huntington Dr #305
South Pasadena, CA 91030

Contact:
Samantha Herrmann obo Assurance Development
(310) 488-6237
sherrmann@assurance-group.com

Property-Owner:
Gonzales, Jesus Diaz & Priscilla (JT)
1734 E Underwood Rd.
Holtville, CA 92250

Description & Tax Lot: Parcel No. 045-600-017

Zoning Classification: A-1, Limited Agricultural

General Plan Designation: Urban

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Assurance Development, Inc., submits this application on behalf of VB BTS III, LLC and T-Mobile West LLC ("T-Mobile"), collectively referred to as the "Applicants," and the underlying property owner."

VB BTS III, LLC is the largest private owner and operator of communications infrastructure in the United States, with more than 320,000 sites nationwide. Infrastructure providers, like VB BTS III, LLC, specialize in developing, constructing, leasing, and maintaining the physical components for wireless networks, including cellular towers. Infrastructure providers lay the physical groundwork that supports wireless communication networks. Wireless carriers, such as T-Mobile, lease space on this infrastructure to house their equipment and offer wireless services to end-users. Through strategic partnerships with wireless carriers, VB BTS III, LLC allows the opportunity for multiple carriers to collocate onto a single infrastructure and reduces the physical footprint of wireless facilities in the community.

1. PROJECT OVERVIEW

VB BTS III, LLC is proposing to build a new wireless communications facility ("WCF" or "Facility"), Holtville CA-5363, at the above noted project address for the colocation of T-Mobile's equipment. This Facility is intended to fill a significant gap in T-Mobile's 5G and 4G LTE coverage experienced by its customers in a targeted coverage area in Imperial County.

The Applicants intend for its application for the proposed WCF to include the following documents (collectively, "Applicants' Application"):

Attachment 1:	Project Narrative (this document)
Attachment 2:	Statement of Code Compliance
Attachment 3:	Conditional Use Permit Application Form
Attachment 4:	Indemnification Form
Attachment 5:	Variance Application Form
Attachment 6:	Authorized Agent Letter of Authorization
Attachment 7:	Owner Letter of Authorization
Attachment 8:	Zoning Drawings
Attachment 9:	Alternative Sites Analysis
Attachment 10:	Assessor's Parcel Map
Attachment 11:	Grant Deed
Attachment 12:	Title Report
Attachment 13:	Photo Simulations
Attachment 14:	Equipment Specifications
Attachment 15:	1T-Mobile Coverage Maps
Attachment 16:	EME Report
Attachment 17:	Co-Location Letter of Intent
Attachment 18:	FAA TOWAIR Report

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As shown in Applicants' Application, this proposed project meets all applicable Imperial County Municipal Code ("ICMC") criteria for siting new wireless telecommunications facilities and complies with all other applicable state and federal laws and regulations. The proposal is also the least intrusive means of meeting T-Mobile's coverage objectives for this site. Accordingly, the Applicants respectfully request Imperial County to review this Application as proposed, subject only to the County's standard conditions of approval.

2. PROPOSED PROJECT DETAILS

2.1. Location

Detailed information regarding the subject property and proposed lease area is included in **Attachment 8, Zoning Drawings**, to the Applicants' application.

2.1.1. Subject property. The subject property of this proposal is located at 1734 E Underwood Rd, Holtville, CA 92250 (Parcel No. 045-600-017) in Imperial County (the "Property"). The Property is owned by Jesus Diaz Gonzales. The Property is zoned as A-1-U and is currently used for residential and agricultural industry purposes.

2.1.2. Lease area.

- The proposed 1600 sq. ft. lease area for the WCF is in the northern portion of the parcel, setback approximately 60 ft. from the north, 315 ft. from the east, 530 ft. from the south, and 5 ft. from the west. (the "Lease Area").

- The lease area will be surrounded by a 6 ft. high chain link fence.

2.1.3. Access and parking. The proposed graveled access road will be 30 ft long and 12 ft. wide. It stems from Thiesen Rd. and stops at the proposed lease area.

2.2. Wireless Facilities and Equipment

Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 8, Zoning Drawings**, to Applicants' Application.

2.2.1. Support structure design. Applicants are proposing to build a new 120 ft tall monopole (the "Tower") on the Property. This will be an unmanned wireless communications facility.

2.2.2. Antennas and accessory equipment.

- The Tower will contain T-Mobile equipment (up to 12 panel antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment).

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- The antennas, RRHs, and accessory equipment on the Tower will be painted to match the Tower. All paint will have an anti-glare finish.
- Space for two additional future collocators has been made available on the Tower as encouraged under the Code, as shown on Sheet A4 of **Attachment 8, Zoning Drawings.**
- The proposed T-Mobile antenna centerline is 115 ft. See elevations on sheet A4 of **Attachment 8, Zoning Drawings.**

2.2.3. Ground equipment.

- The Tower and all ground equipment will be constructed within the fenced Lease Area, not including the proposed Imperial Irrigation District transformer.
- Two (2) ground-mounted radio cabinets.
- One (1) back-up diesel generator.
- An ice bridge is proposed from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas.

2.3. Additional Details

2.3.1. Lighting. The Tower will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. There will be two service lights on site that will only be utilized during site maintenance visits or in case of an emergency. See **Attachment 8, Zoning Drawings**, sheet A3.

2.3.2. Utilities. No water or sewer service is required. A proposed Imperial Irrigation District transformer will be added adjacent to the lease area. Proposed utility route is shown on **Attachment 8,** sheets A1 and A2.

3. T-MOBILE NETWORK COVERAGE AND SERVICES

3.1. Overview—T-Mobile 4G & 5G Coverage

T-Mobile is upgrading and expanding its wireless communications network to support the latest 4G LTE and 5G technology. 4G and 5G stand for "4th Generation" and "5th Generation" and LTE stands for "Long Term Evolution." These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality – 4G LTE offers speed up to ten times faster than 3G, and 5G can deliver speeds up to 20 Gbps in ideal conditions. That's nearly 200 times faster than the 4G network.

Most American consumers currently experience wireless connectivity on 4G networks – and are aware of the profound impact on daily life that has occurred from this connectivity. The emerging standard in voice and data telecommunications – 5G – is poised to transform America's reliance on densely populated wireless infrastructure.

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5G is the latest iteration of cellular technology. While 5G technology operates on the same radio signals as current 4G/4G LTE networks, it is engineered to transmit data more efficiently. That means superior speeds and support for more connected devices than ever before. The ultra-low latency of 5G means quick response times during data-demanding activities.

There are several components of 5G wireless technology and separate bands of wavelength spectrum used to build a 5G network – low-band (<1GHz), mid-band (1-6GHz), and high-band millimeter wave ("mmWave") (24 GHz and higher):

- **Low-Band Extended Range 5G.** Low-band 5G frequencies are also known as the "coverage layer." Low-band 5G refers to frequencies below 1 GHz used to roll out substantial 5G coverage as quickly as possible. One example is the 600 MHz spectrum deployed by T-Mobile nationwide. A low-band cell site can cover hundreds of square miles and deliver a downlink data rate from 30-75 Mbps download—ideal for uses like streaming HD video. Because low-band signals easily pass through buildings, they offer solid coverage indoors and outdoors and are an effective way to connect parts of rural America where even fixed broadband speeds don't always meet national benchmarks.
- **Mid-Band 5G.** Mid-range frequencies (spanning 1 GHz and 6 GHz) strike a balance between coverage and capacity. Mid-band 5G base stations can transmit and receive high-capacity signals over fairly large areas, and they can represent an ideal mix of performance for the bulk of 5G traffic in metropolitan areas.
- **High-Band mmWave 5G.** High-band 5G uses millimeter-wave (mmWave) frequency bands. High-band is a very specialized part of the 5G offering. Functioning over a shorter radius, it's particularly useful in urban areas and busy venues like stadiums and shopping malls. High-band can simultaneously provide many high-speed connections focused on an area of just a block or two, from a small cell site mounted close to street level.

Using these frequencies together can help T-Mobile's 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the proposed Facility will become part of T-Mobile's statewide and nationwide communications network.

4. APPLICABLE LAW

4.1. Local Codes

Pursuant to ICMC Section 92401.05.A, new co-located WCF in the Limited Agricultural District are subject to issuance of a Conditional Use Permit subject to approval by the planning director and must comply with the criteria in 92401.04. **See Attachment 2 — Statement of Code Compliance** for Applicants' demonstration of compliance with the applicable code.

4.2. State Law

Wireless telecommunication facilities that require discretionary review also require environmental review under the California Environmental Quality Act (CEQA). A discretionary

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project is one that requires the exercise of judgement or deliberation by a public agency in determining whether the project will be approved, or if a permit will be issued.

4.3. Federal Law

Federal law, primarily found in the Telecommunications Act of 1996 ("Telecom Act"), acknowledges a local jurisdiction's zoning authority over proposed wireless facilities but limits the exercise of that authority in several important ways.

4.3.1. Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that "prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission ("FCC") Order adopted in September 2018,[1] a local jurisdiction's action has the effect of prohibiting the provision of wireless services when it "materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment."[2] Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.[3]

While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap**. Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City,* 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007*), affirmed in part,* 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco,* 2006 WL 1699580, *10-11 (N.D. Cal. 2006).

- **Least Intrusive Means.** The least intrusive means standard "requires that

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[1] *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part, City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").
[2] Id. at ¶ 35.
[3] Id. at ¶¶ 34-42.

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the provider show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

4.3.2. Environmental and health effects prohibited from consideration. Also under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed facility should be disregarded in this proceeding.

4.3.3. No discrimination amongst providers. Local jurisdiction also may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers' applications for similarly situated facilities.

4.3.4. Shot Clock. Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a "reasonable" period of time. 47 U.S.C. § 332(c)(7)(B)(ii). The FCC has issued a "Shot Clock" rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq*. According to the Shot Clock rule for "macro" wireless facilities, a reasonable period of time for local government to act on all relevant applications is 90 days for a collocation, with "collocation"[4] defined to include an attachment to any existing structure regardless of whether it already supports wireless, and 150 days for a new structure.

The Shot Clock applies to all authorizations required for siting a wireless facility, including the building permit, and all application notice and administrative appeal periods.

Pursuant to federal law, the reasonable time period for review of this application is 150 days.

[4] 47 C.F.R. § 1.6002(g).

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Attachment 2

Statement of Code Compliance

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STATEMENT OF CODE COMPLIANCE
WCF CONDITIONAL USE AND VARIANCE APPLICATION
HOLTVILLE, CA-5363

Submitted to Imperial County
Planning & Development Services Department

The Applicants' proposal complies with all requirements of the Imperial County Municipal Code ("ICMC"), which are addressed in this Statement of Code Compliance in the following order:

Wireless Facilities Requirements

a. Division 24 – Chapter 1 Communication Facilities

PLEASE NOTE: Applicants' responses to the above referenced criteria are indicated below each applicable provision in ***bold italicized blue text.***

Division 24 COMMUNICATION FACILITIES

Chapter 1 COMMUNICATION FACILITIES

92401.00 Purpose.

This division is enacted to establish a consistent set of standards regulating the placement and design of all types of communication facilities in unincorporated areas of Imperial County. These standards are intended to protect and promote public health, safety, community welfare and the unique visual character of Imperial County by encouraging the orderly development of communication infrastructure. It is the intent of the board that these regulations serve to:

A. Protect residential areas and other land uses from potential adverse impacts of towers and antennas;

B. Encourage the location of towers and regeneration facilities in nonresidential areas;

C. Minimize the number of towers throughout the community;

D. Strongly encourage the joint use of new and existing tower sites as a primary option rather than construction of additional single-use towers;

E. Encourage users of towers and antennas to locate them, to the extent possible, in areas where the adverse impact on the community is minimal;

F. Encourage users of towers and antennas to configure them in a way that minimizes the adverse visual impact of the towers and antennas through careful design, siting, landscape screening, and innovative camouflaging techniques;

G. Enhance the ability of the providers of telecommunications services to provide such services to the community quickly, effectively, and efficiently;

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H. Consider the public health and safety of communication towers;

I. Avoid potential damage to adjacent properties from tower failure through engineering and careful siting of tower structures. All towers are to be engineered for the environment in which they are to be located and for the expected loading;

J. Encourage the due consideration of the Imperial County's general plan, zoning map, existing land uses, and environmentally sensitive areas in approving sites for the location of towers and antennas;

K. Minimize the amount of private infrastructure systems in public rights-of-way.

Applicants' Response: The project will comply with the service requirements, placement, design, and other provisions of this Division as demonstrated herein, and will comply with all applicable requirements of State and Federal law.

92401.01 Definitions.

Applicants' Response: This Section has been omitted, however, Applicants acknowledge and understand the definitions of the terms used in this Division.

92401.02 Applicability.

This division shall apply to all types of communication facilities including but not limited to towers, regeneration facilities, amplification facilities, and repeater facilities, whether sited on the ground, or elevated on towers or structures.

A. New Towers and Antennas. All new replacement, or re-permitted towers, antennas or facilities in the unincorporated areas of Imperial County shall be subject to these regulations, except as provided under Section 92401.03. "Re-permitted" means renewal of a permit at any one of the cycles originally approved in the CUP, and also means a facility for which a CUP has expired but is being permitted again by either the same or another owner operator, which may be done by the planning director or the planning commission.

Applicants' Response: Applicants are proposed a new 120' monopole tower (WCF) at 1734 E Underwood Rd, Holtville, CA 92250. Applicants are requesting the review of Application materials and will comply with the regulations set forth in this division.

The remainder of Section 92401.02 has been omitted, as the facilities are not applicable to this project.

92401.03 Exemptions.

Section 92401.03 has been omitted as it is not applicable, as the proposed tower is not exempt from the requirements of this chapter.

92401.04 General requirements.

All new, altered and re-permitted communication facilities in unincorporated areas of Imperial County, with the exception of those exempted under Section 92401.03, shall meet the following general requirements, regardless of the zone in which they are located:

1. Zones. Wireless communication facilities may be located in all base zones which allow such facilities, upon approval of a conditional use permit as described below.

Applicants' Response: The proposed tower is located within the A-1 zone, in which utility and communication facilities are allowed upon approval of a conditional use permit. (Section 90507.02.jj)

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2. Use Permit Required. All wireless communication facilities and all wired or fiber regeneration facilities other than those designated as exempt under Section 92401.03 require a conditional use permit (CUP). To obtain a conditional use permit, a hearing is required before either the planning director or the planning commission, as provided for in this title.

Applicants' Response: Applicants have applied for a Conditional Use Permit and Variance and will comply with further instructions regarding hearings.

3. Building Permit Required. All communication facilities shall require a building permit issued by the county of Imperial.

Applicants' Response: Upon approval of the CUP, Applicants will apply for a building permit from the county.

4. Design Consistency with the Surrounding Environment. To the maximum extent feasible, all wireless communication facilities and all regeneration facilities shall blend in with the predominant features of the existing natural and/or built environments in which they are located. To this end, co-location, stealth mounts, structure mounts and ground mounts are particularly encouraged.

Applicants' Response: The standard finish for wireless communication towers is galvanized, non-reflective sky-blue steel. Many jurisdictions prefer that towers remain unpainted if they are made of dull, non-reflective materials such as galvanized steel. All tower-mounted antennas and equipment will be treated to reduce or eliminate reflective glare.

The proposed tower is to be constructed of galvanized steel. This steel is designed to blend with the surrounding sky. Should the County staff prefer that the tower and equipment be painted, the Applicants are willing to paint the tower and equipment in a color that County staff feels best blends the tower into the surrounding context.

The tower will provide for space for the future co-location of two additional carriers. Please see Sheet A4 of Attachment 8, Zoning Drawings for the tower elevations and carrier locations.

5. Height. All communication facilities shall conform to the following height requirements:

   a. All communication facilities shall be of the minimum functional height, with additional provisions for co-location, as allowed in the respective base zone unless a variance is approved concurrent with a CUP. (For example, if the number of co-locators that a particular facility is designed for is four and the required height is eighty (80) feet, then the allowed height of the facility would be one hundred ten (110) feet and if it is five co-locators, then it would be one hundred twenty (120) feet).

Applicants' Response: The tower is proposed to be one hundred twenty (120) feet with three co-located carriers. The Tower has been proposed to be the lowest possible height to meet carrier objectives. During the CUP Application Process, applicants will be requesting review and approval of a variance.

   b. All communication facilities constructed within three-quarters of a mile of a designated scenic corridor (as designated by the Imperial County general plan) shall conform with the height limit in the zone in which they are located. New facilities that are co-located with an existing facility may exceed their zone's height limit, provided that the installation of the new facility does not require a height increase of the existing facility.

Applicants' Response: The tower is not located within three-quarters of a mile of a designated scenic corridor.

   c. Outside of the three-quarter-mile range of a designated scenic corridor, communication facility, except an exempt facility, may exceed one hundred twenty (120) feet. A bonus of twenty (20) additional feet per facility, up to a maximum height of three hundred (300) feet, is permissible for operators co-locating on a single facility.

Applicants' Response: The tower is proposed to be one hundred twenty (120) feet with three co-located carriers.

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d. No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted, unless facility is fully screened and height does not exceed height permitted by applicable zoning code.

Applicants' Response: The proposed tower is freestanding and therefore this is not applicable.

e. If an operator wishes to apply for an exception to these height limitations, then the facility shall be subject to the provisions at this title relating to conditional use permits and variances hearing processes.

Applicants' Response: Applicants will be be requesting review and approval of a variance concurrently with the CUP and will comply with any hearing processes.

6. Screening. All communication facilities shall be screened to the maximum extent possible, pursuant to the following requirements.

a. Ground- and tower-mounted antennas and all sound structures shall be located within areas where substantial screening by vegetation, landform and/or buildings can be achieved. Additional vegetation and/or other screening may be required as a condition of approval. Each structural screening shall be based on a recommendation from the planning department having addressed the visual impacts, which in some instance may, in fact, warrant no screening.

Applicants' Response: The ground equipment will be secured and screened by the six (6) foot tall chain-link fence.

The remainder of Section 92401.04 has been omitted, as the facilities are not applicable to this project.

7. Radio-Frequency Exposure. No communication facility shall be sited or operated in such a manner that it poses, either by itself or in combination with other such facilities, a potential threat to public health. To that end, no communication facility or combination of facilities shall produce at any time power densities that exceed the current FCC adopted standards for human exposure to RF fields. Certification that a facility meets this standard is required. A copy of the certification from the FCC shall be submitted to the county.

Applicants' Response: The proposed WCF will comply with all standards and regulations set forth by the FCC. Please see Attachment 16, EME Report.

8. Cabling. For structure-mounted antennas, all visible cabling between equipment and antennas shall be routed within the building wherever feasible, or on the roof below the parapet wall. Cabling on the exterior of a building or monopole shall be located within cable trays painted to match. All cabling shall be performed in accordance with the NEC (National Electrical Code).

Applicants' Response: Applicants will comply with the cabling regulations as described.

9. Painting and Lighting. All facilities shall be painted or constructed of materials to minimize visual impact. All towers shall be painted in a non-reflective and preferably earth tone colors. All towers shall be lit with approved lighting as required by the FAA and the Airport Land Use Commissions standards.

Applicants' Response: The standard finish for wireless communication towers is galvanized, non-reflective sky-blue steel. Many jurisdictions prefer that towers remain unpainted if they are made of dull, non-reflective materials such as galvanized steel. All tower-mounted antennas and equipment will be treated to reduce or eliminate reflective glare. Should the County staff prefer that the tower and equipment be painted, the Applicants are willing to paint the tower and equipment in a color that County staff feels best blends the tower into the surrounding context.

10. Noise. All communication facilities shall be designed to minimize noise. If a facility is located in or within one hundred (100) feet of a residential zone, noise attenuation measures shall be included to

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reduce noise levels to a maximum exterior noise level of fifty (50) Ldn at the facility site's property lines.

Applicants' Response: The proposed WCF is not to be located within one hundred (100) feet of a residential zone or residence.

11. Accessory Structures. Enclosures and cabinets housing equipment related to a wireless communication facility shall meet setback and height restrictions for such structures in their zones. Such structures shall appear architecturally compatible (as determined by the planning director evaluating the facility on the basis of color and materials) with their surroundings and be designed to minimize their visual impact. To meet this requirement, underground vaults may be required.

Applicants' Response: Equipment cabinets will be aboveground and screened by the six (6) foot tall chain link fence. All structures meet the setback and height restrictions of the A-1 Zone.

12. Roads and Parking. Communication facilities shall be served by the minimum roads and parking areas necessary and shall use existing roads and parking areas whenever possible.

Applicants' Response: Access will be provided by Thiesen Rd and parking will be available within the access easement for the WCF.

13. Provisions for Future Co-location. All commercial communication facilities shall be encouraged to promote future facility and site sharing. Technical evidence will be provided as to the infeasibility either technical and/or economic, of co-location or grouping prior to the issuance of a new use permit for a facility that would not be considered to be co-located or grouped under this division.

Applicants' Response: The proposed WCF allows for the co-location of two additional carriers. Please see Sheet A4 of Attachment 8, Zoning Drawings for elevations and further locational details.

14. Removal Upon Discontinuation of Use. All equipment associated with a communication facility shall be removed within one hundred eighty (180) days of the discontinuation of the use and the site shall be restored to its original pre-construction condition. The operator's agreeing to such removal and allowing the county access across private property to effect such removal shall be a condition of approval of each permit issued. At its discretion, the county may require a financial guarantee acceptable to the county to ensure removal.

Applicants' Response: Applicants will comply with this provision, if ever applicable.

15. Principal or Accessory Use. Antennas and towers may be considered either principal or accessory uses. A different existing use of an existing structure on the same lot shall not preclude the installation of an antenna or tower on such lot.

Applicants' Response: Acknowledged.

16. Lot Size. For purposes of determining whether the installation of a facility complies with county development regulations, including but not limited to setback requirements, lot-coverage requirements, and other such requirements, the dimensions of the entire lot shall control, even though the antennas or towers may be located on lease parcels within such lot. This shall also take into consideration the height of the tower in the event of a failure whereby it could fall thereby crossing property lines.

Applicants' Response: Acknowledged.

17. Inventory of Existing Sites. Each applicant for a facility shall provide to the planning director an inventory of its existing towers, antennas, or sites approved for facilities, that are either within the jurisdiction of Imperial County or within one mile of the border thereof, including specific information about the location, height and design of each facility. The planning director may share such information with other applicants applying for administrative approvals or special use permits under this division or other organizations

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seeking to locate facilities within the jurisdiction of Imperial County, provided, however that the planning director is not, by sharing such information, in any way representing or warranting that such sites are available or suitable.

Applicants' Response: Please see Attachment 9, Alternative Sites Analysis, for existing wireless sites within the desired coverage area for this facility.

18. Aesthetics. Towers and antennas shall meet the following requirements:

    a. Towers shall either maintain a galvanized steel finish, or, subject to any applicable standards of the FAA, be painted a neutral color so as to reduce visual obstructiveness.

Applicants' Response: The WCF is proposed to be of a galvanized steel finish.

    b. At a tower site, the design of the buildings and related structures shall, to the extent possible, use materials, colors, textures, screening, and landscaping that will blend them into the natural setting and surrounding buildings.

Applicants' Response: Associated equipment will be screened within the lease area by the 6' tall chain-link fence, and no other buildings or structures are proposed.

    c. If an antenna is installed on a structure other than a tower, the antenna and supporting electrical and mechanical equipment must be of a neutral color that is identical to, or closely compatible with, the color of the supporting structure so as to make the antenna and related equipment as visually unobstructive as possible.

Applicants' Response: The proposed antennas are to be installed on the tower.

19. Lighting. Towers shall not be artificially lighted, unless required by the FAA or other applicable authority. If lighting is required, the lighting alternatives and design chosen must cause the least disturbance to the surrounding views and community.

Applicants' Response: The Tower will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. There will be two service lights on site that will only be utilized only during site maintenance visits or in case of an emergency. Please see Attachment 8, Sheet A3 for further locational detail.

20. State or Federal Requirements. All towers must meet or exceed current standards and regulations of the FAA, the FCC and any other agency of the state or federal government with the authority to regulate towers and antennas. If such standards and regulations are changed, then the owners of the towers and antennas governed by this division shall bring such towers and antennas into compliance with such revised standards and regulations as mandated by the controlling state or federal agency. Failure to bring towers and antennas into compliance with such revised standards and regulations shall constitute grounds for the removal of the tower or antenna at the owner's expense.

Applicants' Response: Acknowledged. Please see Attachment 16, EME Report, and Attachment 18, FAA TOWAIR Report for further documentation of compliance with these standards.

21. Building Codes—Safety Standards. To ensure the structural integrity of towers, the owner of a tower shall ensure that it is maintained in compliance with standards contained in applicable state or local building codes and the applicable standards for towers that are published by the Electronic Industries Association, as amended from time to time. If, upon inspection, the county concludes that a tower fails to comply with such codes and standards and constitutes a danger to persons or property, then upon notice being provided to the owner of the tower, the owner shall have thirty (30) days to bring such tower into compliance with such standards. Failure to bring such tower into compliance within thirty (30) days shall constitute grounds for the removal of the tower or antenna at the owner's expense.

Applicants' Response: Acknowledged. Applicants will apply for a Building Permit in compliance with current Building Codes upon approval of the CUP.

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22. Measurement. For purposes of measurement, tower setbacks and separation distances shall be calculated and applied to facilities located in the unincorporated areas of the county of Imperial according to the provisions of this title for the respective base zone.

Applicants' Response: Acknowledged.

23. Not Essential Services. Towers and antennas shall be regulated and permitted pursuant to this division and shall not be regulated or permitted as essential services, public utilities or private utilities.

Applicants' Response: Acknowledged.

24. Franchises. Owners and/or operators of towers or antennas shall certify that all franchises required by law for the construction and/or operation of a communication system in Imperial County have been obtained and shall file a copy of all required franchises with the planning director.

Applicants' Response: Acknowledged.

25. Public Notice. For purposes of this division, any conditional use permit request, variance request, or appeal of an administratively approved CUP or special use permit shall require public notice to all abutting property owners and all property owners of properties that are located within the corresponding separation distance listed for a CUP or variance in the respective base zone, under this title, in addition to any notice otherwise required by the planning director.

Applicants' Response: Acknowledged.

26. Signs. No signs shall be allowed on an antenna or tower except as may be required by law or another permitting or licensing agency.

Applicants' Response: Acknowledged.

27. Buildings and Support Equipment. Buildings and support equipment associated with antennas or towers shall comply with requirements of this title.

Applicants' Response: Acknowledged.

28. Multiple Antenna/Tower Plan. Imperial County encourages the users of towers and antennas to submit a single application for approval of multiple towers and/or antenna sites. Applications for approval of multiple sites shall be given priority in the review process.

Applicants' Response: Acknowledged.

92401.05 Permitting and application requirements.

All communication facilities not specifically exempted from these regulations are subject to one of the two permit processes described below. Both processes include a conditional use permit and may have a concurrent variance. Applications for all permits required pursuant to this division shall be made in writing on a form prescribed by the planning director, and shall be accompanied by plans and data to assure the fullest practical presentation of facts for the permanent record. Such application shall be accompanied by a fee or fees as may be set by the board of supervisors. No part of such fee shall be refundable.

A. Conditional Use Permit Before the planning director. Certain communication facilities may be conditionally approved by the planning director, as described in this subsection.

1. Qualifying Facilities. The following types of communication facilities qualify for a use permit before the planning director:

a. Receive-only radio and television antennas and satellite dishes or antennas that do not qualify for exemption under Section 92401.03, including multiple antennas or dishes on a single parcel;

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b. Amateur radio facilities that do not qualify for exemption under Section 92401.03. When required, a conditional use permit before the planning director shall be granted to amateur radio operators with no fee;

c. Communication facilities installed on publicly owned property, regardless of zone, provided they comply with the general requirements in Section 92401.04 and hold an executed license or lease agreement;

d. Co-located communication facilities, regardless of zone, provided they comply with the general requirements in Section 92401.04.

2. Required Findings. In order for the planning director to approve a proposed communication facility under a conditional use permit, the planning director shall make the findings required for a conditional use permit, as well as, the following additional findings:

a. The facility complies with all applicable Section 92401.04.

b. The facility either: (1) does not require an RF environmental evaluation report as described in Section 92401.08; or (2) the RF environmental evaluation report for the facility shows that the cumulative radio-frequency energy emitted by the facility and any near-by facilities will be consistent with FCC regulations.

c. The facility blends in with its existing environment and will not have significant adverse visual impacts.

3. Administrative Approval Process. The planning director may administratively approve a proposed communication facility by using the following process:

a. Each applicant for administrative approval shall apply to the planning director providing the information and fees set forth in Section 92401.09.

b. The planning director shall review the application for administrative approval and determine if the proposed use complies with Sections 92401.04 and 92401.05.

c. The planning director shall respond to each such application within sixty (60) days after receiving it by either approving or denying the application.

d. In connection with any such administrative approval, the planning director may, in order to encourage shared use, administratively waive any setback requirements or separation distances between towers in the base zone by up to fifty percent (50%).

e. In connection with any such administrative approval, the planning director may, in order to encourage the use of monopoles, administratively allow the reconstruction of an existing tower to monopole construction.

f. If an administrative approval is denied, the applicant shall file an application for a conditional use permit pursuant to subsection B of this section prior to filing any special appeal that may be available under this title.

4. List of Administratively Approved Uses. The following uses may be approved by the planning director after conducting an administrative review:

a. Locating a tower, antenna or facility, including the placement of additional buildings or other supporting equipment used in connection with the tower or antenna, in any industrial or heavy commercial zone or a grouped facility;

b. Locating antennas or existing structures or towers consistent with the terms of subdivisions (4)(b)(i) and (ii) of this section:

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i. Antennas on Existing Structures. Any antenna, which is not attached to a tower, may be approved by the planning director as an accessory use to any commercial, industrial, professional, institutional, or multifamily structure of eight or more dwelling units, provided:

(A) The antenna does not extend more than thirty (30) feet above the highest point of the structure;

(B) The antenna complies with all applicable FCC and FAA regulations;

(C) The antenna complies with all applicable building codes.

ii. Antennas on Existing Towers. An antenna which is attached to an existing tower may be approved by the planning director and, to minimize adverse visual impacts associated with the proliferation and clustering of towers, collocation of antennas by more than one carrier on existing towers shall take precedence over the construction of new towers, provided such collocation is accomplished in a manner consistent with the following:

(A) A tower which is modified or reconstructed to accommodate to collocation of an additional antenna shall be of the same tower type as the existing tower, unless the planning director allows reconstruction as a monopole.

(B) Height.

(1) An existing tower may be modified or rebuilt to a taller height, not to exceed thirty (30) feet over the tower's existing height, to accommodate the collocation of an additional antenna.

(2) The height change referred to in subsection (A)(4)(b)(ii)(B)(1) of this section may only occur one time per communication tower.

(3) The additional height referred to in subsection (A)(4)(b)(ii)(C)(1) of this section shall not require an additional distance separation. The tower's premodification height shall be used to calculate such distance separation.

(C) Onsite Location.

(1) A tower which is being rebuilt to accommodate the collocation of an additional antenna may be moved onsite within fifty (50) feet of its existing location.

(2) After the tower is rebuilt to accommodate collocation, only one tower may remain on the site.

(3) A relocation onsite tower shall continue to be measured from the original tower location for purposes of calculating separation distances between towers pursuant to the base zone.

(4) The onsite relocation of a tower which comes within the separation distances to residential units or residentially zoned lands shall only be permitted when approved by the planning director;

c. New Towers in Nonresidential Zones. Locating any new tower in a nonresidential zone other than industrial or heavy commercial, provided a licensed professional engineer certifies that the tower can structurally accommodate the number of shared users

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proposed by the applicant; the planning director concludes the tower is in conformity with the goals set forth in Section 92401.00 and the requirements of Section 92401.04; the tower meets all setback and separation requirements of the base zone; and the tower meets the following height and usage criteria:

i. For a single user, up to ninety (90) feet in height,

ii. For two users, up to one hundred twenty (120) feet in height,

iii. For three or more users, up to one hundred twenty (120) feet in height,

iv. For four or more users up to one hundred eighty (180) feet in height;

d. Locating any alternative tower structure in a zone other than industrial or heavy commercial that in the judgment of the planning director is in conformity with the goals set forth in Section 92401.00;

e. Installing a cable microcell network through the use of multiple low-powered transmitters/receivers attached to existing wireline systems, such as conventional cable or telephone wires, or similar technology that does not require the use of towers.

Applicants' Response: Acknowledged.

B. Conditional Use Permit Before the planning commission. All other communication facilities or any facility requiring an exception to these regulations shall require a conditional use permit with a public hearing before the planning commission.

1. Qualifying Facilities. A conditional use permit is required for any communication facility that is not exempt under these regulations and that does not qualify for a conditional use permit before the planning director.

2. Required Findings. In order for the planning commission to approve a proposed communication facility under a conditional use permit, the commission shall make the findings required for a conditional use permit, as well as the following additional findings:

a. No alternative site or design is available that would allow for issuance of a conditional use permit before the planning director for the facility. This finding shall be based on the results of an alternatives analysis, as described in Section 92401.06.

b. The facility either: (1) does not require an RF environmental evaluation report as described in Section 92401.08; or (2) the RF environmental evaluation report for the facility shows that the cumulative radio-frequency exposure emitted by the facility and any near-by facilities will be consistent with FCC regulations.

c. The facility blends in with its existing environment and will not have significant visual impacts.

3. Conditional Use Permit Process. Applications for conditional use permits under this subsection shall conform to the requirements of Section 92401.04 and shall be subject to the procedures and requirements of this title relating to the granting of conditional use permits.

4. Conditions. In granting a conditional use permit, the planning commission may impose conditions to the extent the planning commission concludes such conditions are necessary to minimize any adverse effects of the proposed facilities on adjoining properties.

5. Professional Engineer. Any information of an engineering nature that the applicant submits, whether civil, mechanical or electrical, shall be certified by a licensed professional engineer.

Applicants' Response: Acknowledged.

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92401.06 Alternatives analysis—Information required.

For a facility requiring a conditional use permit before the planning commission, an alternatives analysis shall be prepared by or on behalf of the operator, as described below.

A. Alternatives to be Considered. The alternatives analysis shall consider alternative locations and designs for the proposed facility, including those which would not require a conditional use permit. At a minimum, alternatives included in the analysis shall include: (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County. The alternatives analyzed shall be approved by the planning director. For facilities to be located near an incorporated city, the analysis shall also explain why siting within the city is not possible.

B. Findings. The alternatives analysis shall show whether or not the proposed siting and design would have the least possible environmental and visual effect on the community and whether any alternative site or design is available that would allow for issuance of a conditional use permit before the planning director for the facility.

C. Review. The planning director may, at his or her discretion, employ on behalf of the county an independent technical expert to review this alternative analysis. The operator shall bear the reasonable costs of this review.

Applicants' Response: Please see Attachment 9, Alternative Sites Analysis for further detail of the considered locations.

92401.07 Visual analysis.

For a facility requiring review before the planning commission and located within one-half mile of a designated scenic highway, a visual analysis shall be prepared by or on behalf of the operator, as described below. This visual analysis shall demonstrate compliance with provisions of the Imperial County general plan.

A. Contents. The visual analysis shall include at a minimum the following contents.

1. A map of the visual units (as defined in the scenic highway element) from which the proposed facility will be visible;

2. A map of foreground and distant view components, as defined by the scenic highway element;

3. A narrative discussion of the visual impact of the proposed facility based on the items above.

B. Findings. The visual assessment shall compare the proposed facility's visual impacts to the criteria contained in the Imperial County general plan circulation and scenic highway element. It shall make conclusions as to whether the facility would comply with the element and suggest changes to the facility that would make it more compatible with the element.

Applicants' Response: The proposed WCF is not proposed to be located within one-half mile of a designated scenic highway, unless otherwise determined by Planning staff. However, please see Attachment 13, Photo Simulations for a visual simulation of the proposed tower.

92401.08 Radio-frequency exposure review.

An RF environmental evaluation report shall be prepared for any proposed communication facility meeting the specifications below. In order for a proposed facility that requires an RF environmental evaluation report to be

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approved, the report must demonstrate that RF emissions from the facility in combination with existing RF emissions from nearby facilities will meet the current FCC adopted exposure standard.

A. Facilities Requiring an RF Environmental Evaluation Report. Wireless communication facilities meeting any of the following criteria require an RF environmental evaluation report before they may be permitted under these regulations:

1. Facilities described in Table 1 Section 1.1307 "Transmitters, Facilities and Operations Subject to Routine Environmental Evaluation" of the FCC Rules and Regulations, 47 C.F.R. Section 1.1307, or any superseding regulation;
2. Facilities proposed to be installed within fifty (50) feet of an existing communication facility;
3. Facilities with one or more antenna to be installed less than ten (10) feet above any area that is accessible to untrained workers or the public.

Applicants' Response: Please see Attachment 16, EME Report for documentation of RF emissions.

B. Evaluation Report Requirements. The RE environmental evaluation report shall meet the following requirements:

1. The RF environmental evaluation report is subject to approval of the planning director.
2. The RF environmental evaluation report shall be prepared by a radio-frequency exposure professional.
3. The RF environmental evaluation report shall explicitly state that "operation of the proposed facility in addition to other ambient RF emission levels will not exceed current FCC-adopted standards with regard to human exposure in controlled and uncontrolled areas as defined by the FCC."
4. Assumptions utilized for the calculations of RF exposure shall be conservative in nature and at a minimum be in accordance with the most recent FCC guidance on assessment of RF exposures.
5. The RF environmental evaluation report shall compare RF measurements and/or calculations of RF exposure to the applicable FCC exposure standard. The comparison shall include the power density in micro-watts per square centimeter and as a percentage of the applicable FCC exposure standard.
6. RF field measurements of power density of the proposed facility and/or surrounding facilities are required to be included in the RF environmental evaluation report when:
    a. Adequate technical information regarding other wireless communication facilities that may substantially contribute to RF exposure at the subject site is unavailable;
    b. Calculations of RF exposure indicate the possibility of exposures in excess of the FCC exposure standard; or
    c. So directed by the planning director because of concerns about the number of near-by facilities.
7. All required RF field measurements shall be performed by a radio-frequency exposure professional. Evidence must be submitted showing that the testing instrument(s) used were calibrated within their manufacturer's suggested periodic calibration interval, and that the calibration is by methods traceable to the National Institute of Standards and Technology. Measurements shall be performed in compliance with FCC guidance regarding the measurement of RF emissions and shall be conducted during normal business hours on a non-holiday weekday.

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8. The planning director or his or her designee may monitor the performance of testing required for preparation of the RF environmental evaluation report. The cost of such monitoring shall be borne by the operator.

9. For an amateur radio station facility, self-certification of compliance by the amateur radio station license is acceptable if permitted by FCC regulations and conducted under standards and procedures set forth by the FCC.

Applicants' Response: Acknowledged.

92401.09 Towers.

In addition to any information required for applications for conditional use permits pursuant to this division and this title, applicants for a conditional use permit for a tower shall submit the following information:

A. A scaled site plan clearly indicating the location, type and height of the proposed tower, on-site land uses and base zoning, adjacent land uses, and zoning (including when adjacent to other municipalities), general plan designation of the site and all properties, adjacent roadways, proposed means of access, setbacks from property lines, elevations drawings of the proposed tower and any other structures, topography, parking and other information deemed by the planning director to be necessary to assess compliance with this division;

B. Legal description of the parent tract and leased parcel (if applicable);

C. The setback distance between the proposed tower and the nearest residential unit, platted residentially zoned properties, and unplatted residentially zoned properties;

D. The separation distance from other towers described in the inventory of existing sites shall be shown on an updated site plan or map. The applicant shall also identify the type of construction of the existing tower(s) and the owner/operator of the existing tower(s), if known;

E. A landscape plan showing specific landscape materials;

F. Method of fencing and finished color, and if applicable, the method of camouflage and illumination;

G. A description of compliance with Section 92401.04, as well as the provisions of this title, and all other applicable federal, state or local laws;

H. A notarized statement by the applicant as to whether the construction of the tower will accommodate the collocation of additional antennas for future users;

I. Identification of the entities providing the backhaul network for the tower(s) described in the application and other cellular sites owned or operated by the applicant in the county;

J. A description of the suitability of the use of existing towers, other structures or alternative technology not requiring the use of towers or structures.

Applicants' Response: Acknowledged. Items requested in this section have been included in the CUP and Variance Application.

92401.10 Modifications to facilities.

To the extent necessary to ensure compliance with adopted FCC regulations regarding human exposure to RF emissions, or upon the recommendation of the planning director, the operator shall modify the placement of the facilities; install fencing, barriers or other appropriate structures or devices to restrict access to the facilities; install signage, including the radio-frequency hazard warning symbol identified in ANSI C95.2-1982 and multilingual

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warnings if deemed necessary by the planning director to notify persons that the facility could cause exposure to RF emissions; and/or implement any other practice reasonably necessary to ensure that the facility is operated in compliance with adopted FCC RF emission standards.

Applicants' Response: Acknowledged. Applicants will comply with Subsection 92401.10.

92401.11 Changes to FCC standards.

If the FCC RF emission standards are modified, the operator shall ensure that the facility is reevaluated for compliance with the new standards, and a recertification statement prepared by a radio-frequency exposure professional shall be submitted by the operator to the planning director prior to the effective date of the new FCC RF emission standards. For an amateur radio station facility, self-certification of compliance by the amateur radio station license is acceptable if permitted by FCC regulations and conducted under standards and procedures set forth by the FCC.

Applicants' Response: Acknowledged. Applicants will comply with Subsection 92401.11.

92401.12 Life of approval.

A. General Term. Permits for communication facilities issued under these regulations shall generally be valid for three years, unless such term is changed through the permitting process.

B. Co-located facilities. A permit for a new co-located facility at a facility with an existing permit that has more than three years remaining on it shall have the same term as the existing permit. If a permit is issued for a new co-located facility at a facility with an existing permit that has less than three years remaining on it, then the existing permit shall be extended to the same term as the new permit.

C. Revocation. If the conditions of a conditional use permit granted under this division are not complied with, the Use Permit may be revoked pursuant to this title of the Codified Ordinances of the county of Imperial.

D. Renewal. All permits, regardless of the method by which they were originally given, may be extended administratively by the planning director or his or her designee upon verification of the permit-holder's continued compliance with the findings and conditions of approval under which the application was originally approved. As a part of the renewal process, the planning director or his or her designee may require submission of certification by a radio-frequency exposure professional that the facility is being operated in accordance with all applicable FCC standards for RF emissions. At his or her discretion, the planning director or his or her designee may require a public hearing for renewal of a permit for a communication facility under a conditional use permit.

Applicants' Response: Acknowledged. Applicants will comply with Subsection 92401.12.

92401.13 Facilities in existence prior to adoption of these regulations.

Applicants' Response: This section has been omitted as it is not applicable. Applicants are proposing a new freestanding Tower.

92401.14 Public benefit.

In the interest of the county of Imperial and for public benefits including, but not limited to, health and safety law enforcement services, and the greater good of the residents of the county, a public benefit program is herewith established.

The program under direction of the planning director shall secure from all applicants a public benefit service. This may be in the form of a fee, equipment, services or any combination of the above.

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In order to implement this program uniformly, the planning director shall secure the input from Imperial Valley Emergency Communication Authority (IVECA).

The planning director shall have the authority to negotiate with any applicant/permittee for a local benefit agreement. This may be in the form of a written contract/agreement or a development agreement or such other instrument acceptable to counsel. Regardless of the vehicle used the final agreement shall be reviewed and approved by the planning commission and their decision shall be final.

The board of supervisors herewith authorizes the planning commission to enter into such agreements.

Applicants' Response: Acknowledged.

END OF STATEMENT OF CODE COMPLIANCE.

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ASSURANCE
DEVELOPMENT

Attachment 8

Zoning Drawings

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PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 120' MONOPOLE WITH (10) 8' ANTENNAS, (12) RRU'S, (1) 3' MICROWAVE, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) BACK-UP DIESEL GENERATOR, (1) 10'x15' ICE CANOPY, (2) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON H FRAME WITHIN A 45'x40' FENCED LEASE AREA. NO WATER OR SEWER SERVICE IS REQUIRED. THIS WILL BE AN UNMANNED FACILITY.

CODE COMPLIANCE:

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

1. 2022 CALIFORNIA BUILDING CODE
2. 2022 CALIFORNIA TITLE 24
3. 2022 CALIFORNIA FIRE CODE
3. 2022 CALIFORNIA ELECTRIC CODE
4. 2022 CALIFORNIA ENERGY CODE
5. 2022 CALIFORNIA MECHANICAL CODE
6. TIA/EIA-222-H OR LATEST EDITION
5. ANY LOCAL BUILDING CODE AMENDMENTS TO THE ABOVE
6. CITY/COUNTY ORDINANCES

verticalbridge

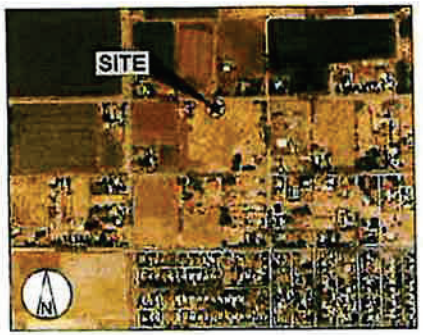
US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

120' MONOPOLE

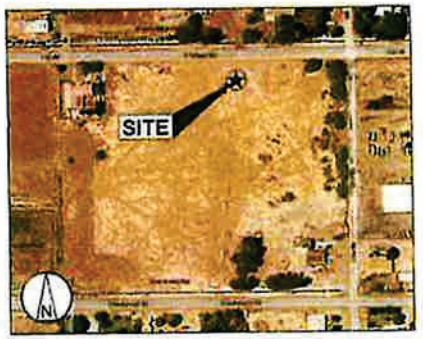
TENANT SITE ID: SD07772

APPROVAL BLOCK				
		APPROVED	APPROVED AS NOTED	DISAPPROVED REVISE
VERTICAL BRIDGE	DATE	☐	☐	☐
SITE ACQUISITION	DATE	☐	☐	☐
CONSTRUCTION MANAGER	DATE	☐	☐	☐
PERMITTING	DATE	☐	☐	☐
RF ENGINEERING	DATE	☐	☐	☐



VICINITY MAP
NTS

DRAWING INDEX	
DRWG #	TITLE
T1	TITLE SHEET
LS-1	BOUNDARY DETAILS
LS-2	TOPOGRAPHIC SURVEY
A1	SITE PLAN
A2	ENLARGED COMPOUND PLAN
A3	EQUIPMENT AND ANTENNA PLAN
A4	ELEVATIONS



LOCATION MAP
NTS

PROJECT INFORMATION	
SITE NAME:	HOLTVILLE
SITE NUMBER:	US-CA-5363
TENANT SITE ID:	SD07772
SITE ADDRESS:	1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
PARCEL #:	045-600-017
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-1 LIMITED AGRICULTURAL (IMPERIAL COUNTY)
ZONING JURISDICTION:	IMPERIAL COUNTY
CONSTRUCTION TYPE	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE	MONOPOLE
STRUCTURE HEIGHT:	120'
CONSTRUCTION AREA:	1,600 SQ. FT
GROUND ELEVATION:	-21.93' (NAVD88)
LATITUDE (NAD 83)	32.821736° (32° 49' 18.25" N)
LONGITUDE (NAD 83):	-115.386383° (115° 23' 10.98" W)

EMERGENCY:
CALL 911

UNDERGROUND SERVICE ALERT

PROJECT DIRECTORY	
PROPERTY OWNER:	GONZALES JESUS DIAZ & PRISCILLA (JT) 1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
APPLICANT:	VERTICAL BRIDGE 750 PARK OF COMMERCE DR. #200 BOCA RATON, FL 33487
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE: 626.765.5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT
TELCO COMPANY:	AT&T

EEC ORIGINAL PKG

CLIENT
verticalbridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8307

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

3	REVISED PER COMMENTS	JR	07/19/24
2	REVISED PER COMMENTS	CV	06/19/24
1	SUBMITTAL PACKAGE	RH	04/19/24

DRAWN BY: CV
DESIGNED BY: CV
CHECKED BY: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
TITLE SHEET

DRAWING SCALE: AS NOTED
DATE: 04/19/24
ZD

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DRAWING NUMBER
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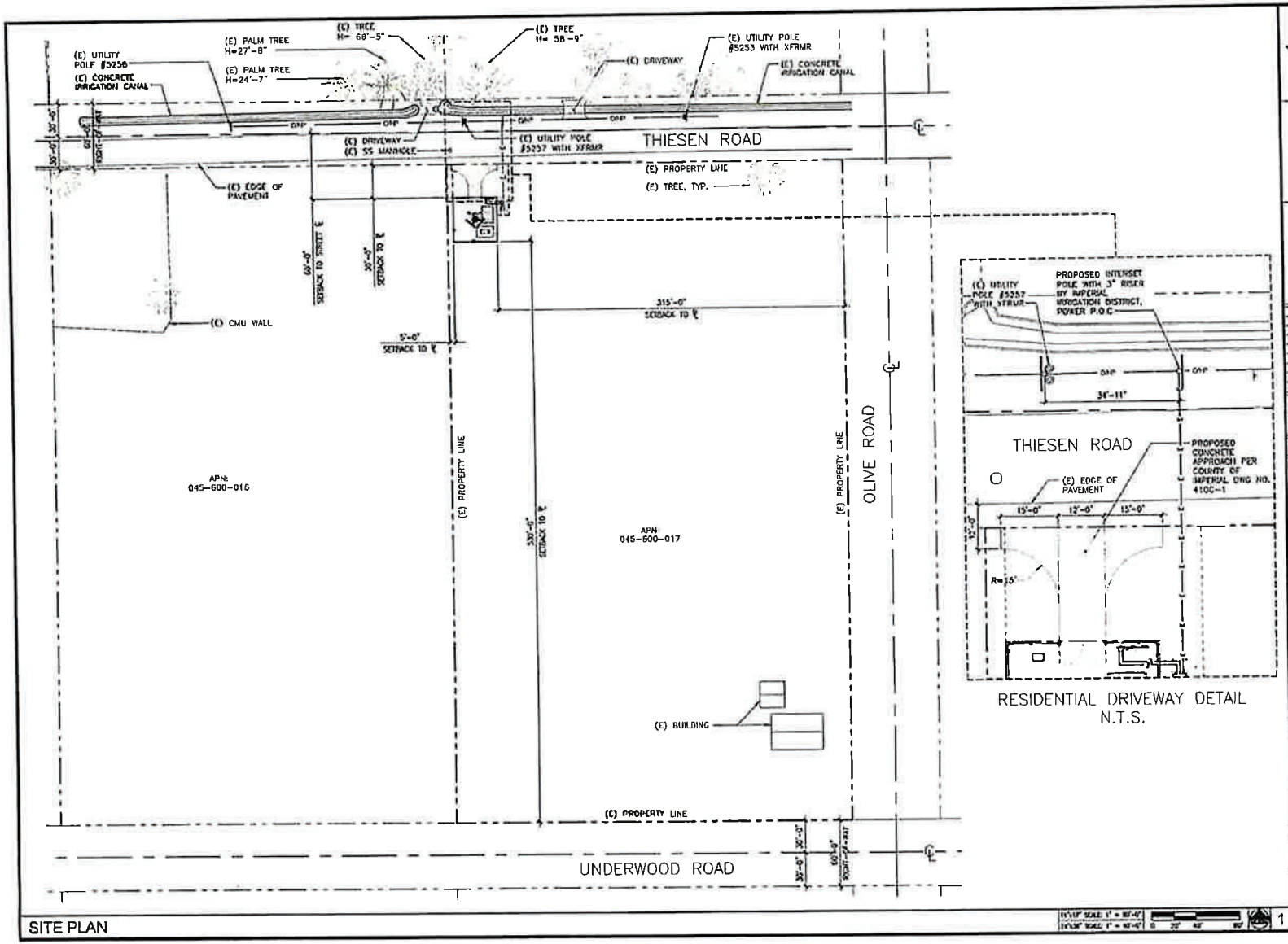

CLIENT
vertical bridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8397

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5078

NO	SUBMITTAL REVISION	BY	DATE
0	ISSUED FOR REVIEW	CV	09/19/23
A	ISSUED FOR REVIEW	CV	09/19/23

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER # US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD.
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
SITE PLAN

DRAWING SCALE
AS NOTED
DATE
09/19/23
ZD

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DRAWING NUMBER
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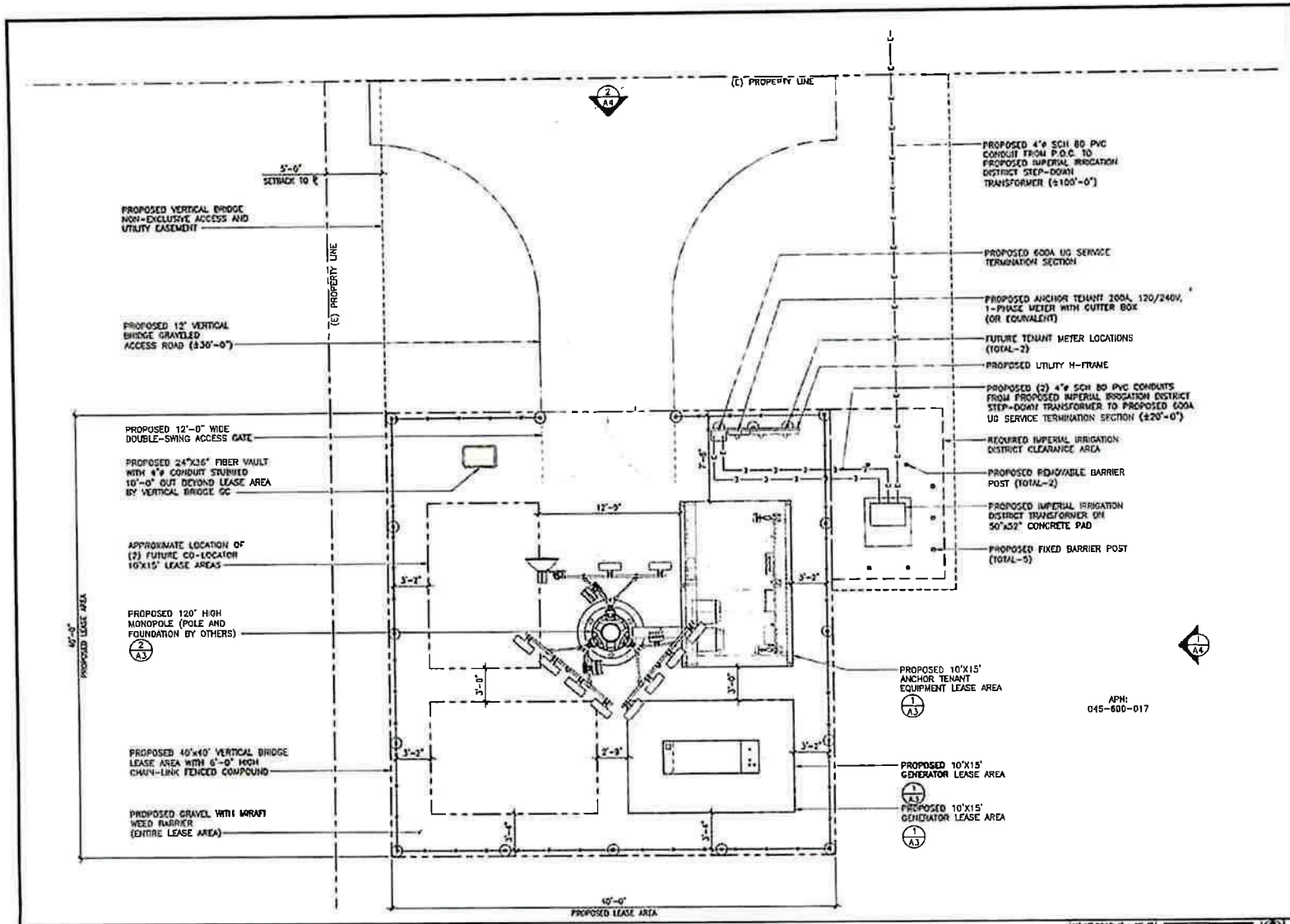

ENLARGED COMPOUND PLAN

CLIENT
vertical bridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8367

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5870

0	ISSUED FOR ZONING	JP	09/09/21
A	ISSUED FOR REVIEW	CV	09/14/21
1	SUBMITTAL REVISIONS	BP	DATE

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

DRAWING TITLE
ENLARGED COMPOUND PLAN

DRAWING SCALE AS NOTED
DATE 09/14/21
ZD

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DRAWING NUMBER
A2

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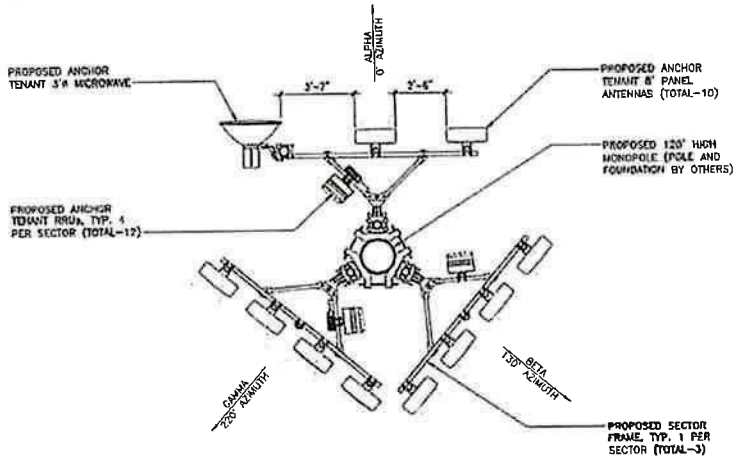


ANTENNA PLAN

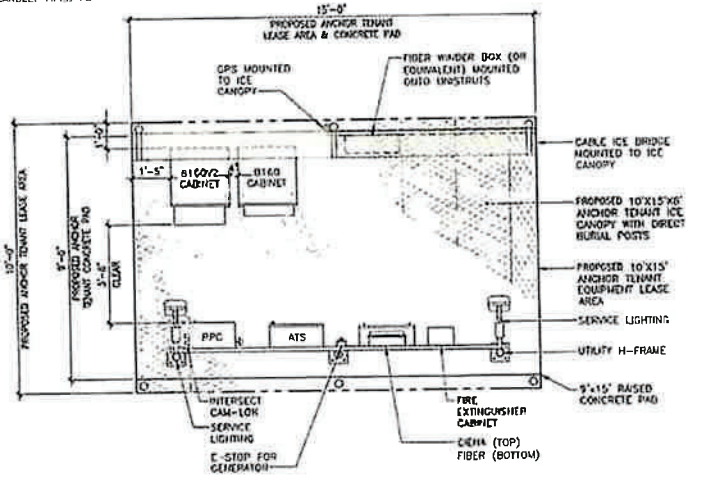
2

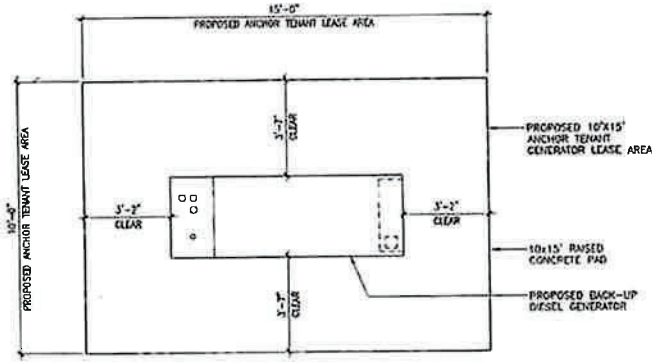
NOT USED

3

SERVICE LIGHTING NOTES:
1. THE SERVICE LIGHT IS MANUALLY SWITCHED ON/OFF BY THE SITE TECHNICIAN IN EMERGENCY SITUATIONS
2. MAINTENANCE OF THE CELL SITES ARE NORMALLY PERFORMED DURING DAY-LIGHT HOURS.
3. THE SERVICE LIGHT SHALL BE POINTED ~45° TOWARDS THE GROUND.

SERVICE LIGHTING SPECIFICATIONS.
MODEL: PLTS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2097 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN

1

CLIENT
verticalbridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 6367

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1999 HUNTINGTON DR | SUITE 303
SOUTH PASADENA, CA | 91030
626 765 5079

0	ISSUED FOR ZONING	JP	03/07/24
A	ISSUED FOR REVIEW	KV	04/19/24
M1	SUBMITTAL REVISION	BR	DATE

DRAWN BY: CV
DESIGNED BY: CV
CHECKED BY: APP
PROJECT MANAGER: MEGANS

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD.
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
EQUIPMENT AND ANTENNA PLAN

DRAWING SCALE: AS NOTED
ZD
DATE: 04/19/24

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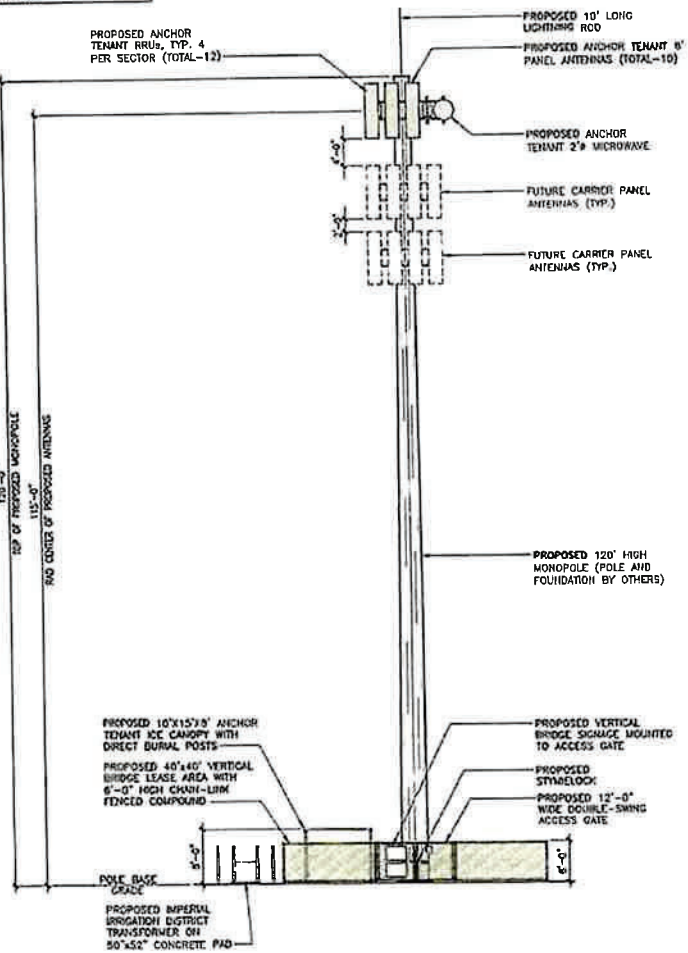
DRAWING NUMBER
A3

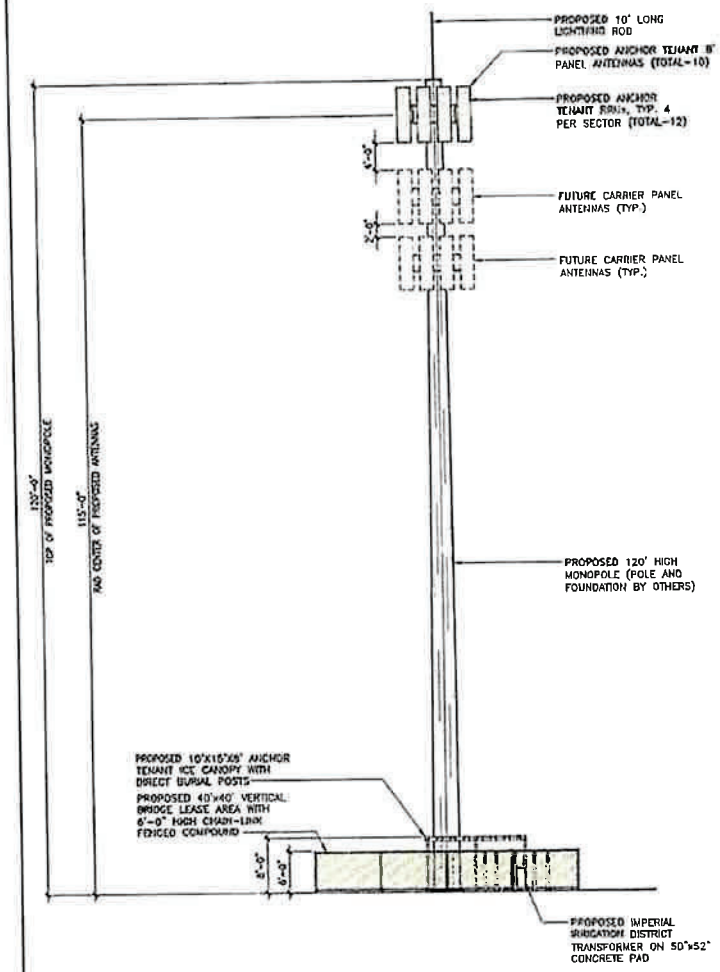
EEC ORIGINAL PKG

NOTES:
1. ANTENNAS AND RRUS TO BE PAINTED TO MATCH MONOPOLE



NORTH ELEVATION

2



EAST ELEVATION

1

CLIENT
verticalbridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 6367

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1490 HUNTINGTON DR | SUITE 205
SOUTH PASADENA, CA | 91030
626 765 5078

B	ISSUED FOR ZONING	JR	09/19/23
A	ISSUED FOR REVIEW	CV	08/16/23
NO	SUBMITTAL DESCRIPTION	BY	DATE

DRAWN BY: CV
DESIGNED BY: CV
CHECKED BY: APP
PROJECT MANAGER:

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
ELEVATIONS

DRAWING SCALE: AS NOTED
DATE: 09/19/23
ZD

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A4

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ASSURANCE
DEVELOPMENT

Attachment 9

Alternative Sites Analysis

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Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

Prepared By:
Samantha Herrmann, Assurance Development
T-Mobile/Vertical Bridge
2/12/2025

EEC ORIGINAL PKG

Summary

A search ring was provided by T-Mobile's Radio Frequency ("RF") Engineer identifying the project's coverage needs. We reviewed this search ring and compared it to existing zoning, development requirements, land uses, and existing parcel conditions. After this review, we identified multiple properties as potential sites. Locating outside of this search area would not meet T-Mobile's coverage goals; and therefore, sites outside of the search ring were not considered.

The Imperial County code requires that the alternative analysis shall include (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County.

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Collocation on Existing Towers

Whenever possible, T-Mobile seeks to construct new sites on existing infrastructure before proceeding with the construction of a new free-standing facility. Before allocating a search area to an infrastructure provider like Vertical Bridge, T-Mobile conducts thorough research, ensuring all collocation opportunities are explored and exhausted. There are three existing towers within the determined search radius. These towers are limited in the opportunities to co-locate, and they do not offer the height required to meet T-Mobile's coverage objectives for this tower. It was determined that collocating an existing tower was not a feasible alternative, and further analysis is included in the table below.

Collocation on Existing Non-Tower Structures @ 119' antenna tip height AGL

There are no structures within the search area that can support the required height of 119' to meet the coverage objectives for this tower. The buildings in this area are residential structures at heights ranging from 20'-30'.

These structures cannot support a tower at the required height while meeting the requirements set forth in Code Section 92401.04(5)(d): "No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted, unless facility is fully screened and height does not exceed height permitted by applicable zoning code." Therefore, Applicants have proposed to locate a freestanding monopole tower at 1734 E Underwood Rd.

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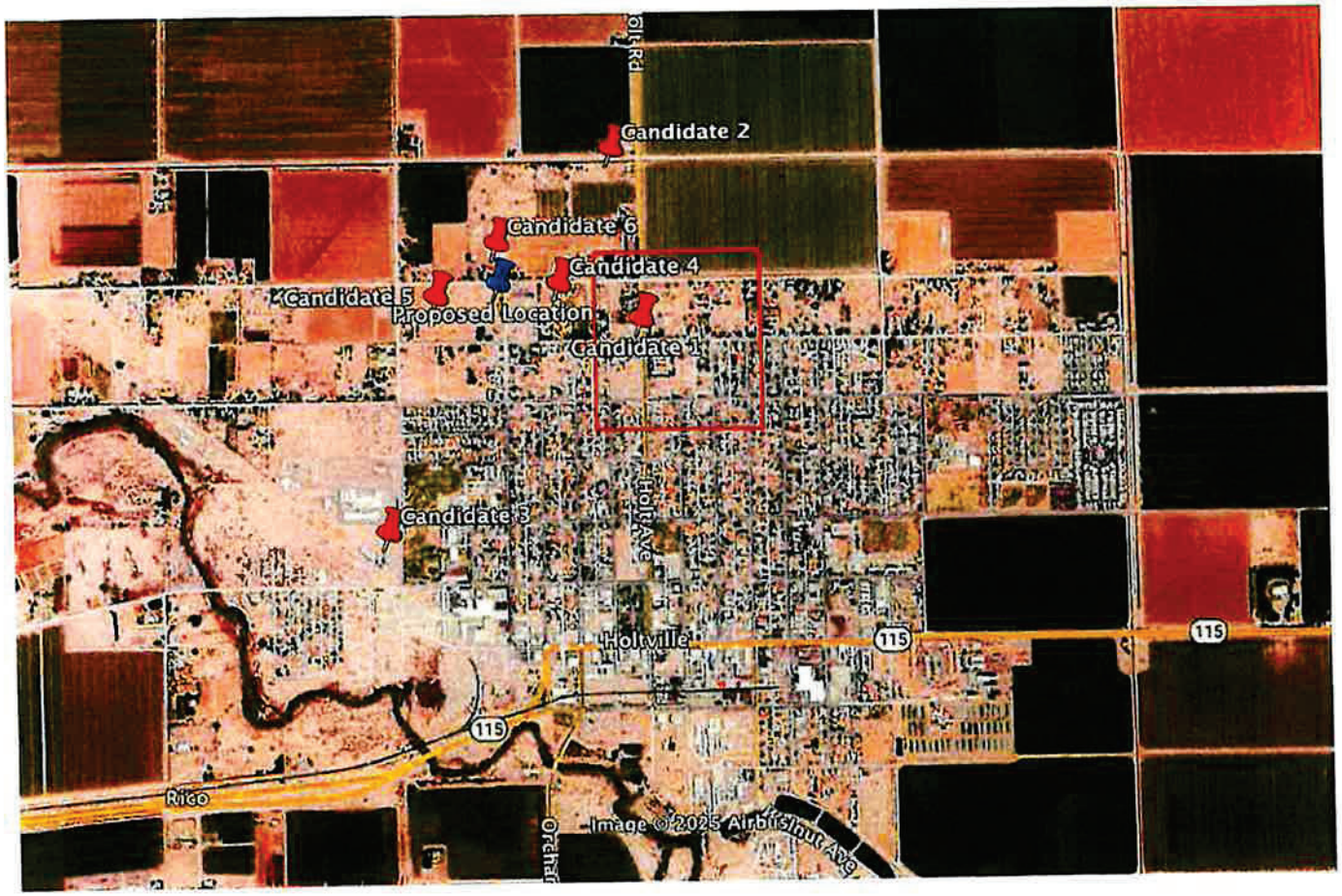
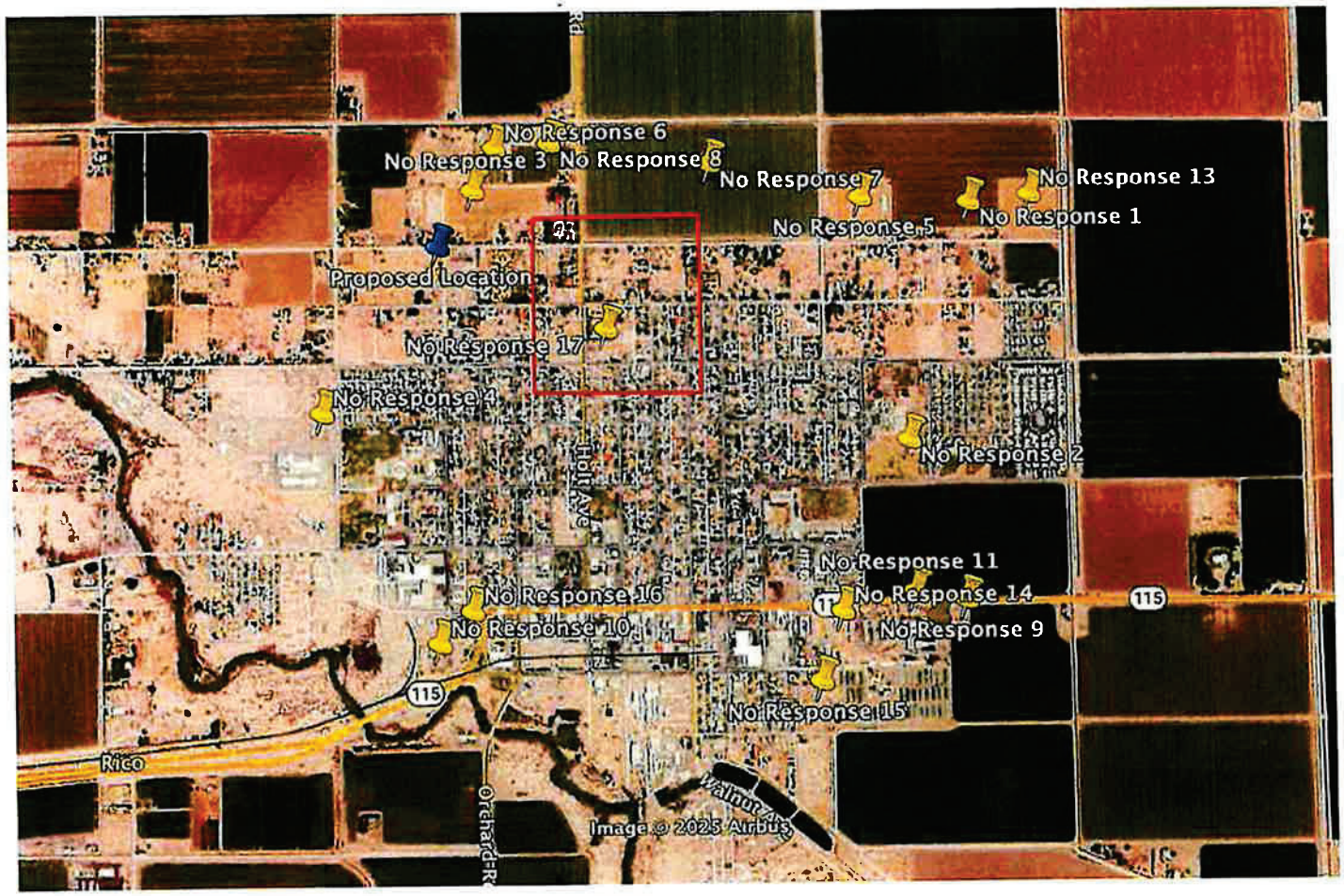
T-Mobile Alternative Candidates Map



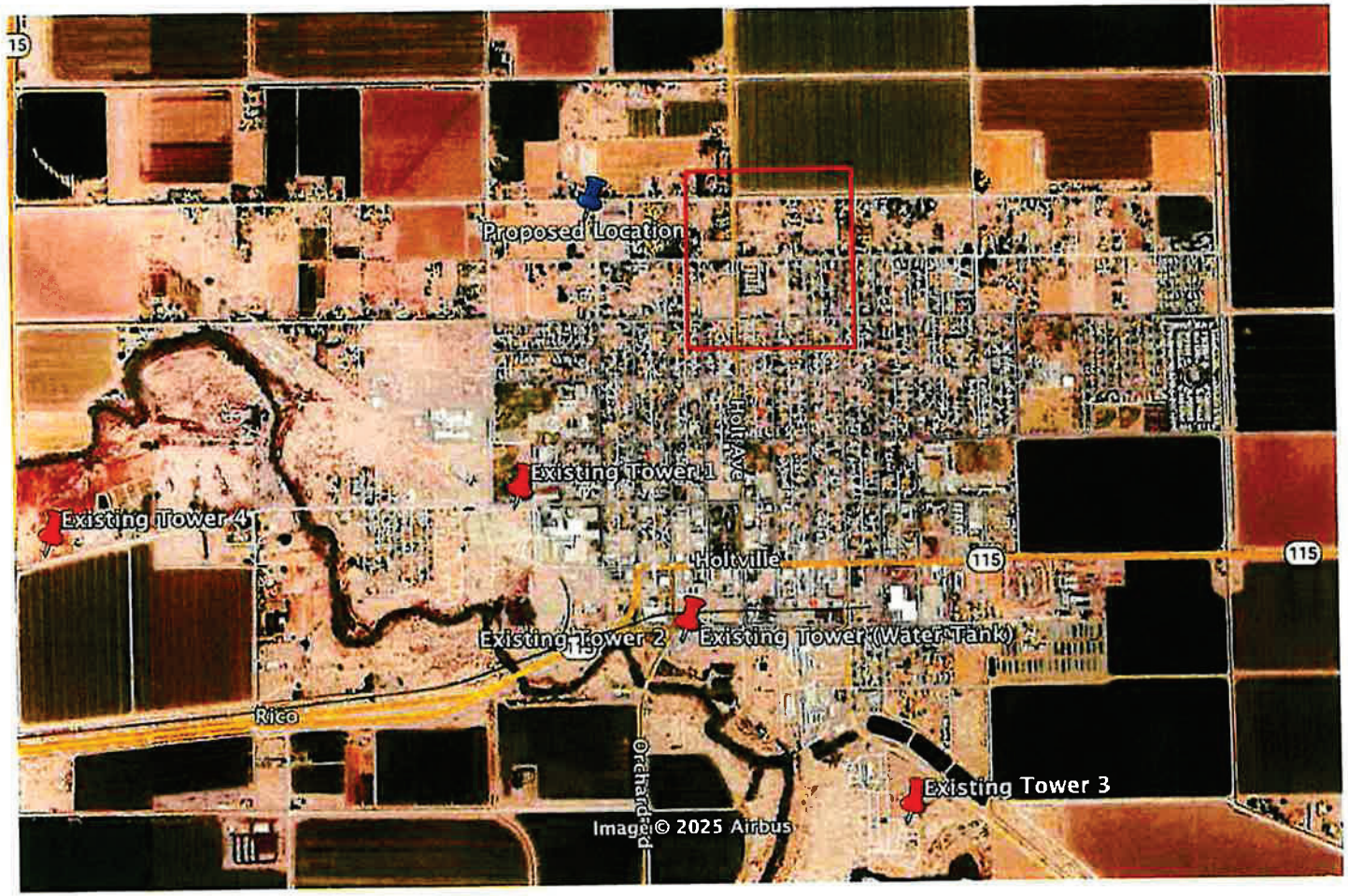
EEC ORIGINAL PKG

Property Owners Contacted – No Response



EEC ORIGINAL PKG

Existing Towers within Search Ring



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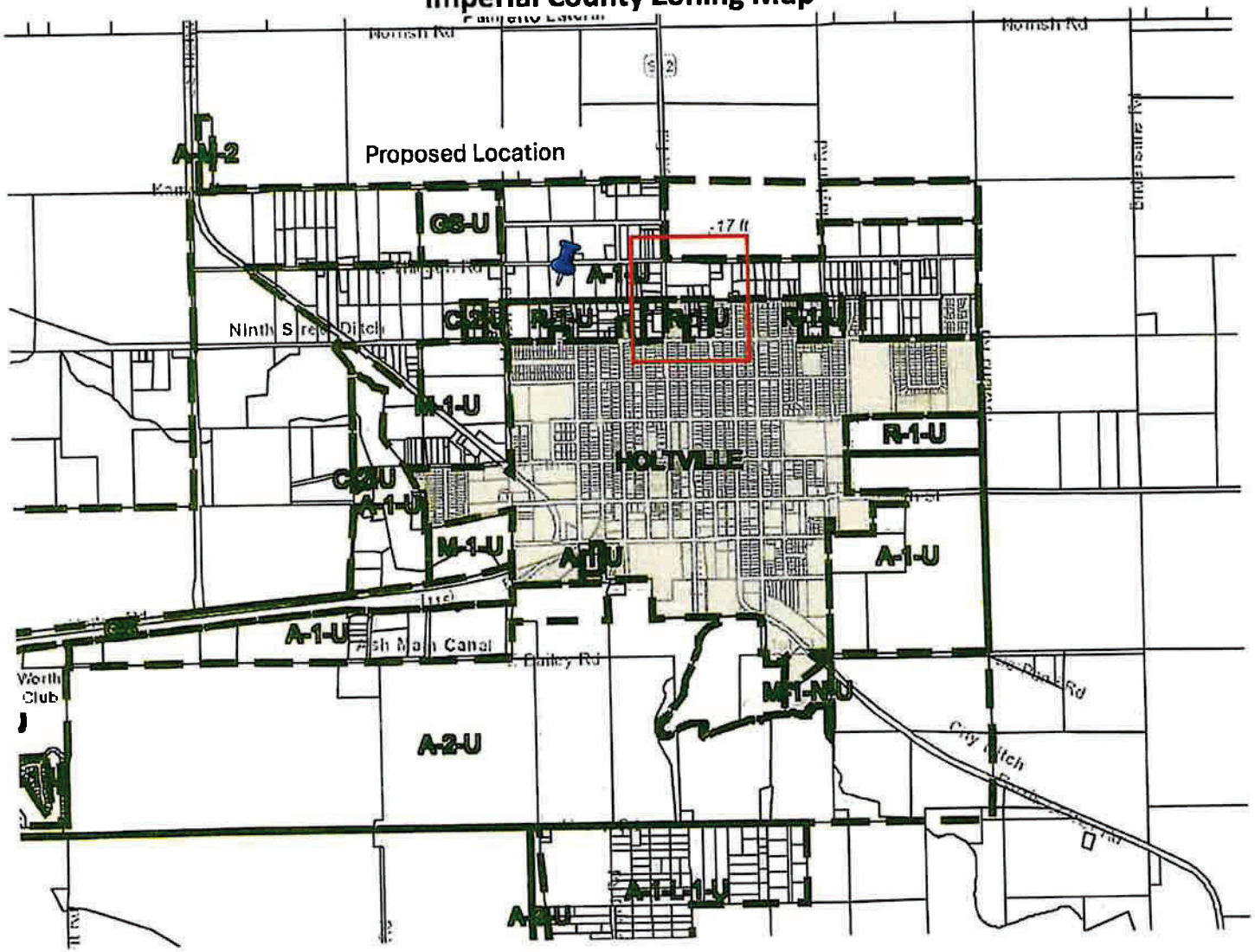
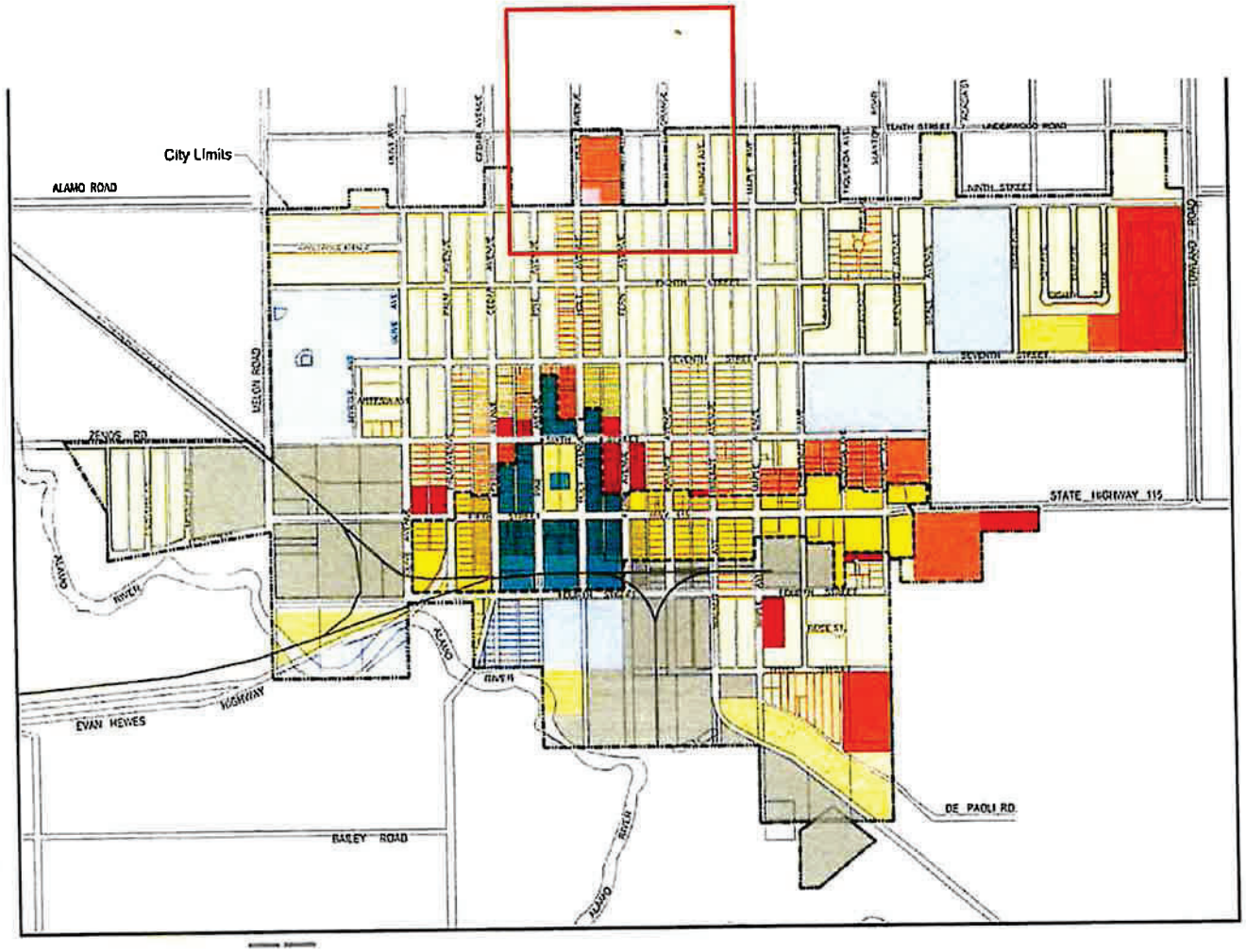
Imperial County Zoning Map



EEC ORIGINAL PKG

City of Holtville Zoning Map



Legend

- OS Open Space
- R-1 Single Family
- R-2 Two Family
- R-3 Multi-Family
- R-4 Mobile Home Park
- RC Residential Commercial Mixed-Use
- C-1 Neighborhood Commercial
- C-2 General Commercial
- I-1 Light Industrial
- CF Community Facilities
- Downtown - A Zone
- Downtown - B Zone
- City Limits

EEC ORIGINAL PKG

Alternative Analysis Summary - Collocations

	Location	Distance to Proposed Location	Feasible? (Y/N)	Summary
Collocation on Existing Towers				
1	32.8127, -115.3882	Approx. 0.6 Miles	N	This approx. 80' Microwave tower is owned by the Imperial Irrigation District, Telecommunications Section. The height of the tower does not meet the T-Mobile's coverage requirements.
2	32.8087, -115.3823	Approx. 0.9 Miles	N	This Water Tank tower, at approx.100', limits the opportunity to collocate, as there is restricted space inside the water tank portion, and additional antennas often need to be installed on the legs of the tower. The sillouhette of the water tank design then becomes less aesthetically appealing.
3	32.8033, -115.3744	Approx. 1.4 Miles	N	T-Mobile has existing equipment located at this site. The proposed location would contribute to T-Mobile's coverage of Holtville.
4	32.81150833, -115.404900	Approx. 1.3 Miles	N	This lattice tower is outside of the desired coverage area and would not provide sufficient coverage to Holtville.

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ASSURANCE
DEVELOPMENT

Attachment 10

Assessor's Parcel Map

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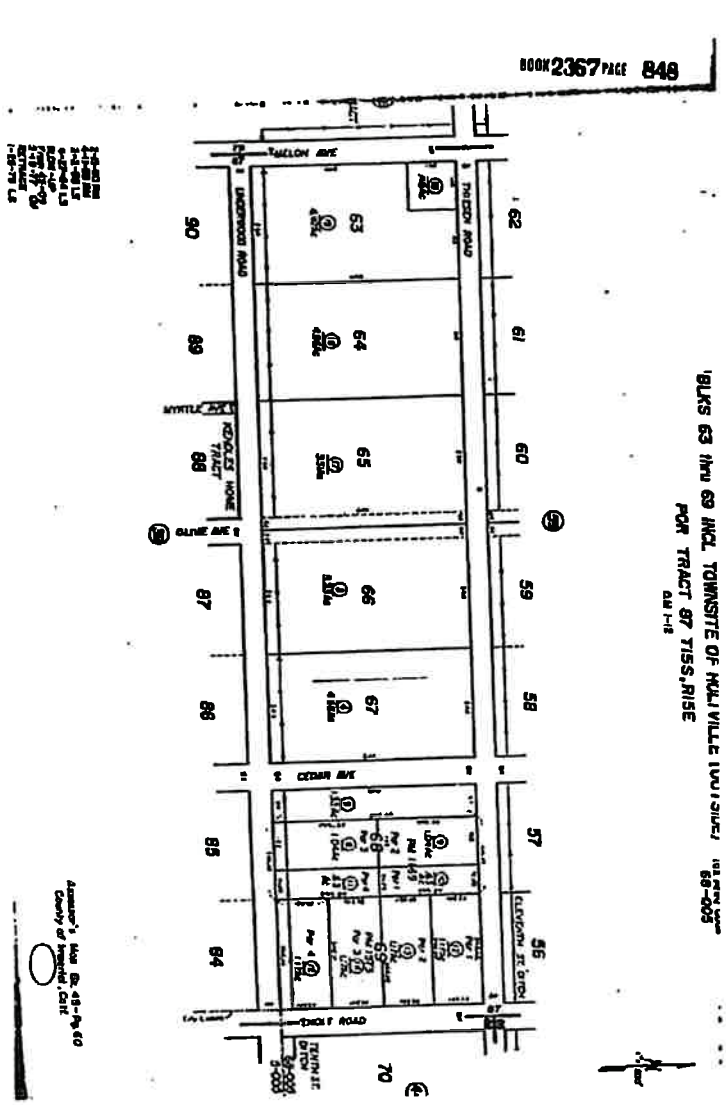

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ASSURANCE
DEVELOPMENT

Attachment 13

Photo Simulations

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EEC ORIGINAL PKG

AERIAL MAP



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EXISTING



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DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	1/06/2025	ISSUED FOR SUBMITTAL	JFY

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
A	1 / 4

AERIAL MAP



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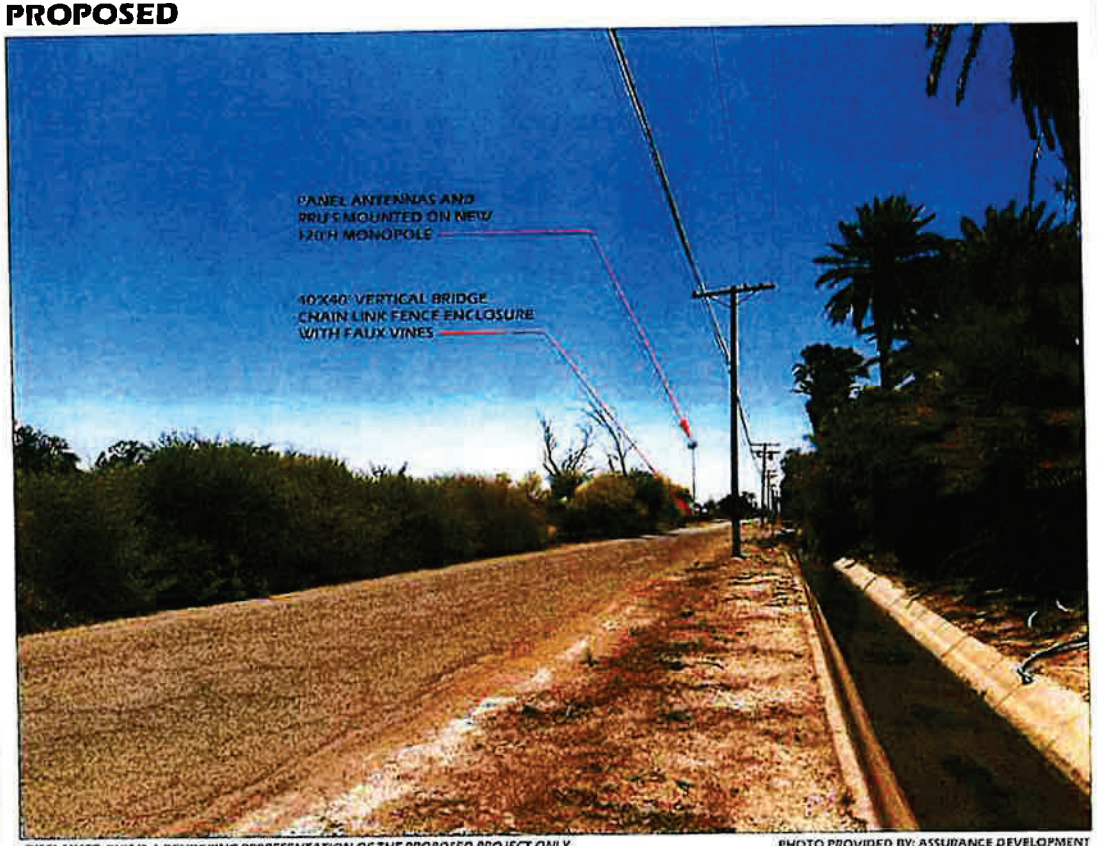
EXISTING



PROPOSED



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verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
B	2 / 4

EEC ORIGINAL PKG

AERIAL MAP



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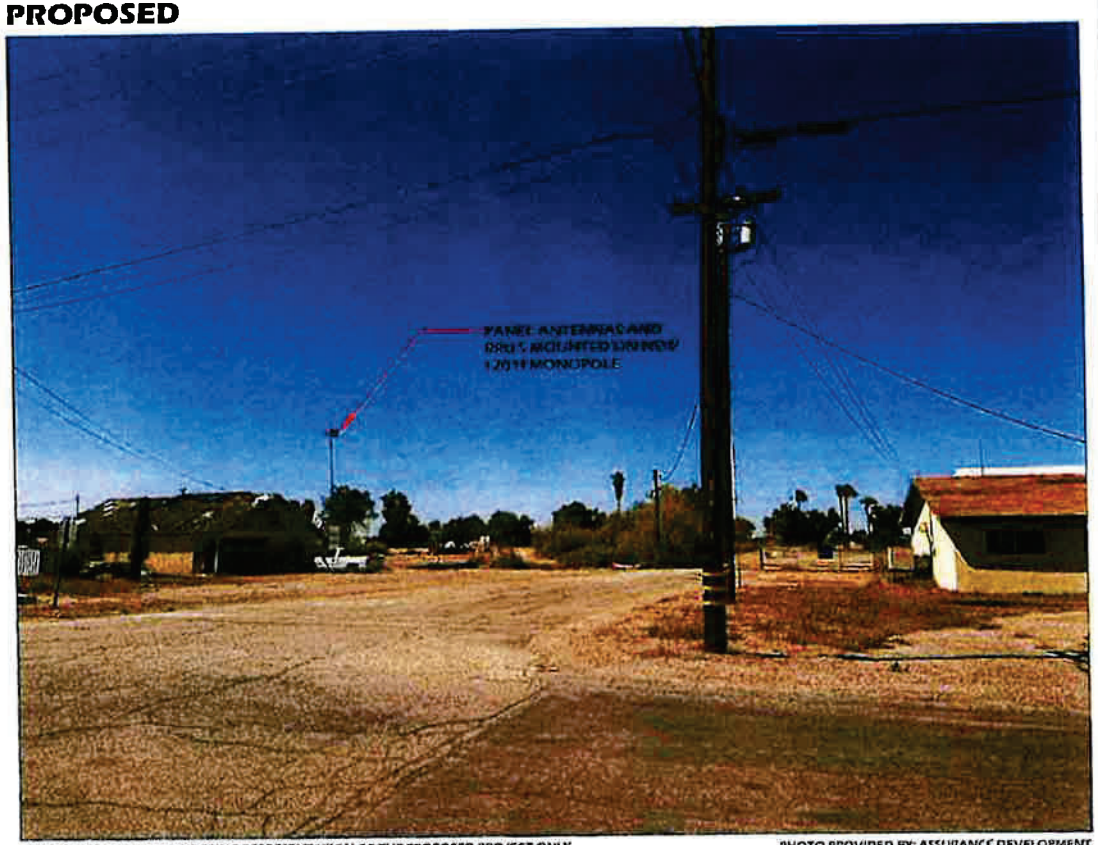

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DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	1/09/2025	ISSUED FOR SUBMITTAL	JFY

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
C	3 / 4

EEC ORIGINAL PKG

EEC ORIGINAL PKG

AERIAL MAP



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PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK	ASSURANCE DEVELOPMENT	NO.	DATE	REVISIONS	BY	verticalbridge	US-CA-5363 HOLTVILLE 1734 E UNDERWOOD ROAD HOLTVILLE, CA 92250	VIEW	SHEET
		0	1/06/2025	ISSUED FOR SUBMITTAL	JFY			D	4 / 4

ASSURANCE
DEVELOPMENT

Attachment 14

Equipment Specifications

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ERICSSON

AIR 6419 B41



AIR 6419, an Advanced Antenna System (AAS) with 64 transmitters and 64 receivers, improves upon previous generations of product with respect to energy efficiency and deployment capabilities. An Advanced Antenna System (AAS) such as AIR 6419 together with the Massive MIMO and Multi-User MIMO software features enables greater spectral efficiency. Enhanced bitrate per user achieved through interference suppression by applying beamforming capabilities in the downlink and the uplink.

Capacity increased by scheduling users in the cell on different layers supporting both Single User MIMO (SU-MIMO) and Multiuser MIMO (MU-MIMO). Application coverage is improved through beamforming in both the vertical and horizontal dimensions.

To support cost efficient site deployments, AIR 6419 includes Layer 1 beamforming enabling enhanced Common Public Radio Interface (eCPRI) to be used between the AIR 6419 and RAN Compute portfolio products. The increasing capacity demands in operator's networks create needs for new spectrum efficient solutions.

Like its predecessor AIR 6449, AIR 6419 supports different cell or broadcast beam shapes, to meet different user distribution scenarios. The flexibility to steer the transmitted energy for control signaling in both azimuth and elevation enables improved efficiency in various deployments scenarios including Macro, Hotspot and High-rise.

The improved design of AIR 6419 enables faster roll out with minimal site impact, improved mid-band coverage and capacity boost for both existing and new bands compared to the use of traditional radio and antenna systems.

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TECHNICAL SPECIFICATIONS AIR 6419 B41

PRODUCT NUMBER:	KRD 901 212/11	
ADVANCED ANTENNA SYSTEM		
Operating frequency band:	3GPP Band 41, 2496 – 2690 MHz (full band)	
Instantaneous bandwidth:	194 MHz	
Output Power	320 W	
EIRP max.	79 dBm	
Antenna configuration	(3x1) x (4x8)	
Architecture:	64T64R connected to an array of dual polarized antenna elements.	
Modulation:	Downlink	Up to 256 QAM.
	Uplink	Up to 64 QAM.
Multi-antenna beamforming functionality*:	Downlink SU-MIMO Downlink MU-MIMO	Up to 16 layers per carrier.
	Uplink SU-MIMO Uplink MU-MIMO	Up to 16 layers per carrier.
	Cell shaping	Pre-defined cell or broadcast beam shapes**; Macro, Hotspot and High-rise.
	Digital down-tilt	Continuously adjustable for macro scenario, fixed for Hotspot and High-rise scenario.
Mechanical specifications*		
Weight:	approx. 37.8 kg (83 lbs) excluding installation kit	
Size (H x W x D):	approx. 921 x 531 x 229 mm (or 36.3" x 20.9" x 9.0") (including protrusions) approx. 894 x 531 x 177 mm (or 35.2" x 20.9" x 7.0") (excluding protrusions)	
Operational specifications*		
Wind Load Maximum:	approx. 650 N (front), 175 N (side) @ 42 m/s wind speed (pole installed)	
Operating Temperature Range:	-40° to + 55° C	
Solar radiation:	≤ 1,120 W/m²	
Relative humidity:	2% to 100%	
Absolute humidity:	0.26 to 40 g/m³	
IP Classification:	IP65	
Main Interfaces		
Baseband:	Two eCPRI interfaces using 25G SFP+ ports with link capacity 25 Gb/s each. One 25 Gb/s eCPRI interface is sufficient for up to 100 MHz carrier bandwidth and 16 layers.	
Power Supply:	-48 V DC (3-wire or 2-wire) via a connector. Maximum fuse rating is 50 A.	
Mounting:	Optional mechanical tilt and swivel installation kit for wall and pole mounting.	
Handling:	Handle for lifting and hoisting.	

* Preliminary Specifications provided

** Additional scenarios, cells or broadcast beam shapes possible with future software releases. Refer detailed description for more details on NR and EIRP for specific scenarios

Preliminary PA4
Telefonaktiebolaget LM Ericsson
SE-164 80 Stockholm, Sweden
www.ericsson.com

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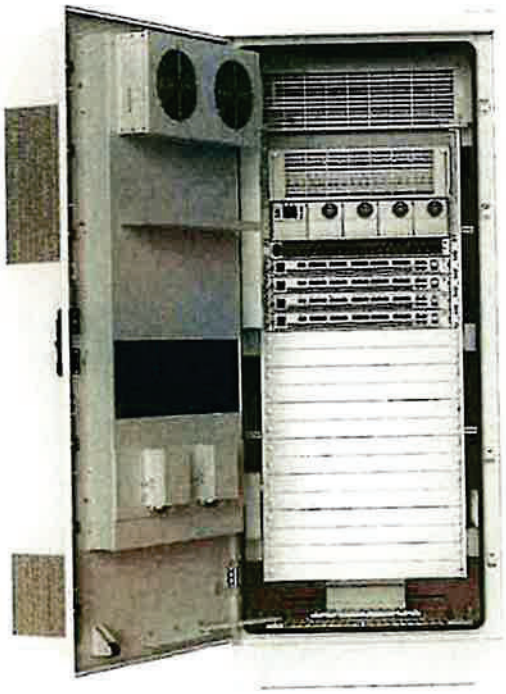
EEC ORIGINAL PKG

ERICSSON

Enclosure 6160 AC

UTE6160_AC_V2

The Enclosure 6160 is a multi-purpose site cabinet designed to support a multitude of equipment such as ERS Baseband, Transport, Li-Ion battery and 3PP vendor equipment. It also provides a highly capable power system and battery back-up - all in a streamlined design and minimized footprint to support cost efficient expansion of mobile broadband.



Being an all-in-one enclosure, the Enclosure 6160 is a very fitting choice for all types of sites where the capacity need is large or room for future expansion is needed. It is ideally used for modernizing existing sites or in greenfield scenarios to match both current and future needs.

With a robust design, IP65 compliance and a sealed Heat Exchanger (HEX) climate system the Enclosure 6160 ensures optimal environmental protection of the active equipment - enabling them for a long-lasting service. The complete system is also integrated and verified for the entire Ericsson Radio System and ensures best-in-class service.

The power system offers 31,5kW of power in total and provides 24kW of -48V DC power for both internal and external consumers.

The equipment space allows 19U of rack space ensuring well enough capacity for existing need and future expansion.

One of the main advantages of the Enclosure 6160 is its default integration with ENM - allowing for advanced remote monitoring and control such a fault management (alarms), inventory management and performance measurements. The cabinet also provides an open O&M interface for integration to 3PP O&M systems.

EEC ORIGINAL PKG

Technical specification for Enclosure 6160 AC V2

CAPACITY	
Rack space user equipment	19U (19" rack) (excluding Compact DCDU)
Hardware capabilities	ERS Baseband and Transport units Power and CPRI support for multi-standard remote radios (RRU or AIR) Li-Ion batteries (19" form factor) 3PP equipment
MECHANICAL SPECIFICATION	
Weight	197 kg (433 Lbs) (excluding user equipment & Rectifier modules. Includes cDCDU, Fiber storage, L-supports & 1U air restrictor plates, etc)
Dimension (H x W x D)	1600 x 650 x 650 mm (includes 4" Base frame) - Foot print 1600 x 650 x 850 mm (includes 4" Base frame) - Includes door 63 x 26 x 26 in. (includes 4 "Base frame) - Foot Print 63 x 26 x 33 in. (includes 4 "Base frame) - Includes door
Base frame height & Weight	4 in. (Ordered seperately and not part of the main cabinet), 17 Kgs 12 in. (Ordered seperately and not part of the main cabinet), 34kg
Rectifier Weight	1.7 Kgs (each) - Configurable from 1 to 9
Mounting position	Ground
Enclosure material	Aluminum
Color	Power paint NCS 2002-B
Door	Front access
Rack type	19" (IEC 60297-3-100)
Locking type	Pad lock or Cylinder
POWER SYSTEM	
Input voltage	3P+N+PE: 346/200-415/240 VAC 2P+N+PE: 208/120-220/127 VAC 1P+N+PE: 200-250 VAC
Cabinet AC Power Rating	250 A (2 x 125 A)
Input power	<33kW
Output load (-48VDC)	24kW (Max user load)
Total capacity (-48VDC)	31.5kW
AC SPD	Class 2/Type 2
DC SPD	Class 2/Type 2
PSU Slots	9x
Service outlet	Optional
Priority load	8x Circuit Breaker
LLVD 1	6x Circuit Breaker
LLVD 2	6x Circuit Breaker
CB ratings (Bullet Style) - default	3A / 5A / 10A / 15A / 20A / 25A / 30A / 40A / 50A / 60A / 80A / 100A
T-Mobile Bullet Style CB combinations	6x 40A, 1x 100A, 1x 200A, 2x 300A
Battery Interface	2x Circuit Breaker
Battery Circuit Breaker rating	125A 2pol (200A)

Telefonaktiebolaget LM Ericsson
SE-164 80 Stockholm, Sweden
www.ericsson.com

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EEC ORIGINAL PKG

PSU capacity	3500W
PSU efficiency	96%
PSU output voltage (nominal)	-48VDC
PSU rated current	73A
PSU power factor	≥0.99
PSU emissions	EN 55022 Class B
Ingress protection power system	IP20
DC Distribution Unit – T-Mobile config	
Output load (-48VDC)	9kW
CB slots	20x
CB ratings	4x 6A, 4x 10A, 8x 20A

ENVIRONMENTAL SPECIFICATION

Ingress protection	IP65
Environment	Class 1.2 (Storage) Class 2.3 (Transport) Class 4.1 (Operation) ETSI EN 300 019-1-1
Relative humidity	15-100%

CLIMATE SYSTEM

Type	Heat Exchanger
Temperature range	-33°C to +50°C* -27°F to +122°F*
Cooling capacity (Total)	3700W
Heater	2x 500 Watts
Smart OAM	Hardware prepared for FM, PM & Inventory data
Acoustic Noise (dB)	70 dB average @ full load @ Horizontal distance of 1.5 M and vertical distance of 1 Meter

STANDARDS COMPLIANCE

	UL 62368-1, UL 60950-22, UL 50E Telcordia GR-63-CORE Telcordia GR-487-CORE Telcordia GR-1089-CORE

CABLE I/O

Entry point	Bottom
Plinth cable access	Rear and side access
General	1x Ø16-35mm
DC Out (shielded)	18x Ø10-18mm
DC In (battery feed)	4x Ø19mm
Signal Cable Outlet	10x Ø10mm
Signal Cable Inlet	8x Ø6mm
Optical	22x Ø6mm
Conduits knock-out plates	6x Ø2"
Punched holes	3x Ø26mm

REMOTE MANAGEMENT

External Alarms (Dry Contact)	32x
Smart Alarms	Hardware Prepared
Controller interface northbound	IP / Electrical Ethernet
FM, PM, CM & IM	Please refer to Controller 6610 Datasheet

*Configuration dependent – please refer to CPI

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SE-164 80 Stockholm, Sweden
www.ericsson.com

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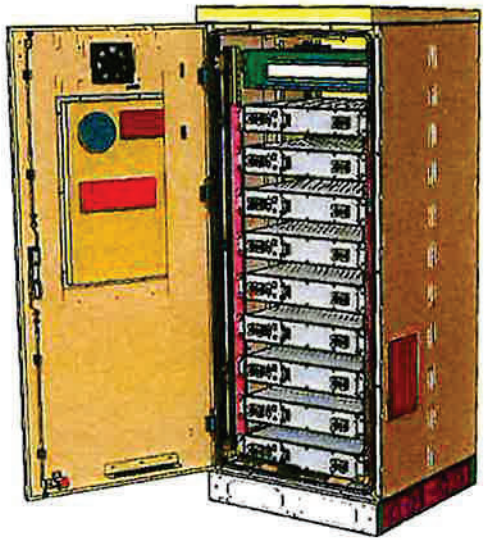
Enclosure B160



Enclosure B160
AirCon + VRLA



Enclosure B160
AirCon + Li-Ion



Enclosure B160
Convection Cooling
+ VRLA

EEC ORIGINAL PKG

Enclosure B160

Capacity
- VRLA 12V: 100Ah / 150Ah / 170Ah / 190Ah / 210Ah
- Li-Ion: 24U 19" / 23"
- Sodium-Nickel: 3x FIAMM

Electrical specification
- DC Output: -48VDC/200A
- Battery breakers: 2x 125/2p
- Alarms: Door open, Climate failure, MCB Connection

Mechanical specification
- Weight: 134kg
- Dimensions: 63 x 26 x 26 in. (incl. Base frame)
- Base frame height: 6 in.
- Material: Galvanized steel (180g/m^2)
- Color: Powder paint NCS 2002-B
- Door: Front access
- Locking type: Pad lock / cylinder

Environmental specification
- Ingress protection: VRLA/Sodium IP44
Li-Ion IP55
- Relative humidity: 15-100%

Climate system
- Air Conditioner
  - Fan type: DC
  - Cooling capacity: 500W @L35/L35
- Convection cooling
  - Emergency fan

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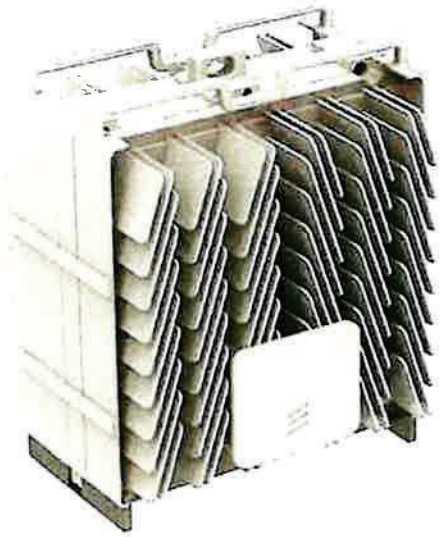
ERICSSON

Radio 4460



Product features
Radio 4460 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x140 W in total and up to 4x80 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4460 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

Radio 4460 provides support for AISG TMA and RET towards the antenna system.

It supports GSM, WCDMA, LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT) with GSM in mixed mode.

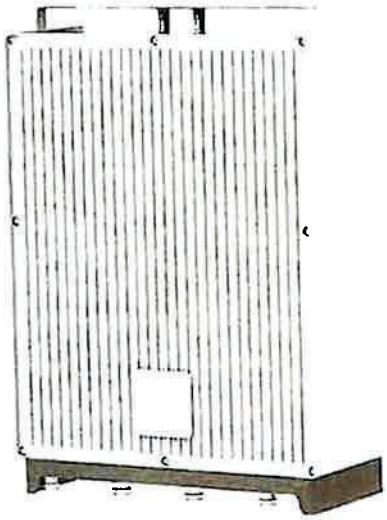
Radio 4460 also supports up to 4 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

Rev A

EEC ORIGINAL PKG

ERICSSON

Radio 4480



Product features
Radio 4480 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x100 W in total and up to 4x60 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4480 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

Radio 4480 provides support for AISG TMA and RET towards the antenna system.

It supports LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT).

Radio 4480 also supports up to 2 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

Rev A

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TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4480 **PRODUCT NUMBER: KRC 161 922/1**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 71 and Band 85A

HW CAPACITY:
IBW: Up to 35 MHz in B71, Up to 17 MHz in B85A
MIMO: Yes, 4T/4R
Output power: Up to 4 x 60 W in B71, Up to 4 x 60 W in B85A. Up to 100 W in total

INTERFACE SPECIFICATIONS:
Power supply: 1 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 1, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 42 kg (93 lbs)
Volume: approx. 41 l (11 gal)
Dimensions (HxWxD): 553mm x 398mm x 190mm (21.8"x15.7"x7.5") (incl. protrusions)
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65 .
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

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TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4460 **PRODUCT NUMBER: KRC 161 912/3**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 2/25 and Band 66

HW CAPACITY:
IBW: Up to 65 MHz in B2/25, Up to 90 MHz in B66
MIMO: Yes, 4T/4R
Output power: Up to 4 x 80 W in B2/25, Up to 4 x 80 W in B66. Up to 140 W in total

INTERFACE SPECIFICATIONS:
Power supply: 2 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 4, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 49.5 kg (109 lbs)
Volume: approx. 50 l (13 gal)
Dimensions (HxWxD): 432mm x 384mm x 301mm (17.0 x 15.1" x 11.9")
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

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ASSURANCE
DEVELOPMENT

Attachment 15

T-Mobile Coverage Maps

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REGIONAL NETWORK ENGINEERING & OPERATIONS

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COVERAGE & CAPACITY OBJECTIVES ENGINEERING JUSTIFICATION

US-CA-5363 Holtville

12/27/2024

Prepared by: Alexandre Renaldino



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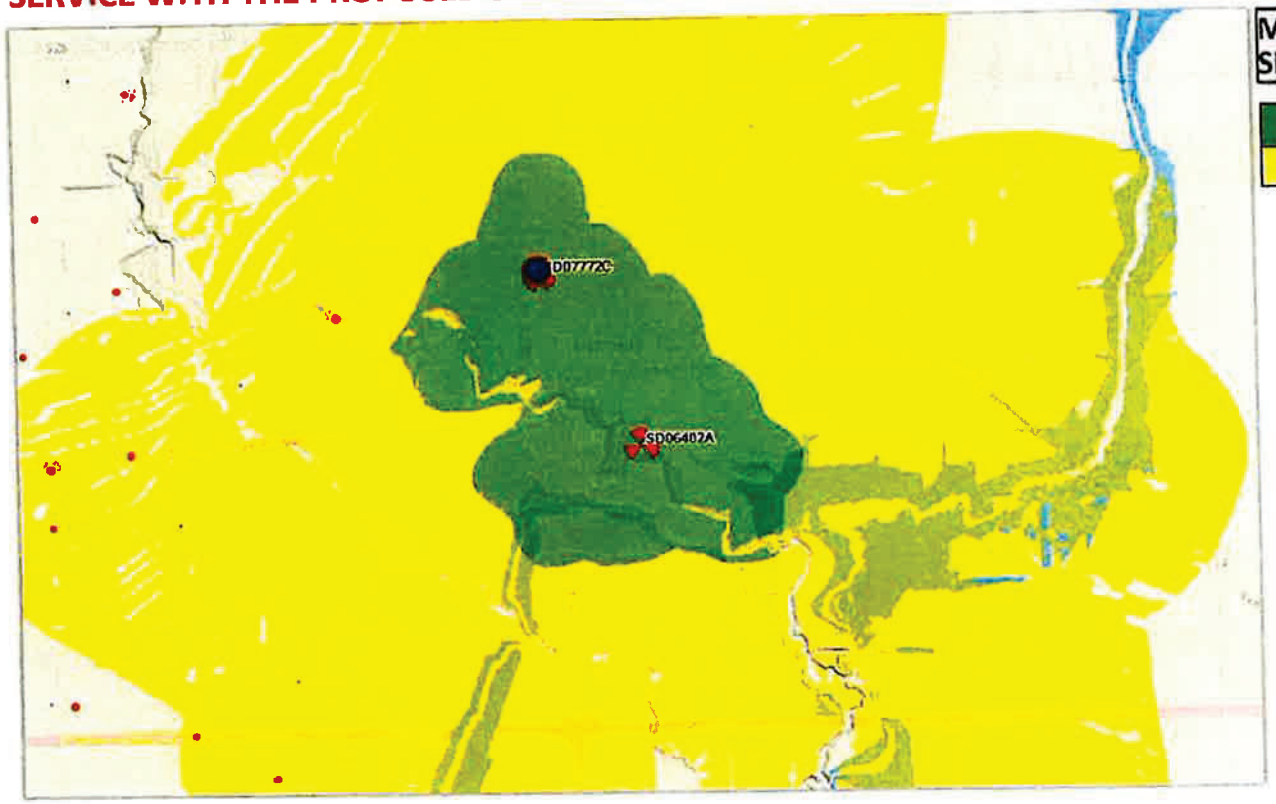
PREDICTION TOOL OUTPUT
SERVICE WITH THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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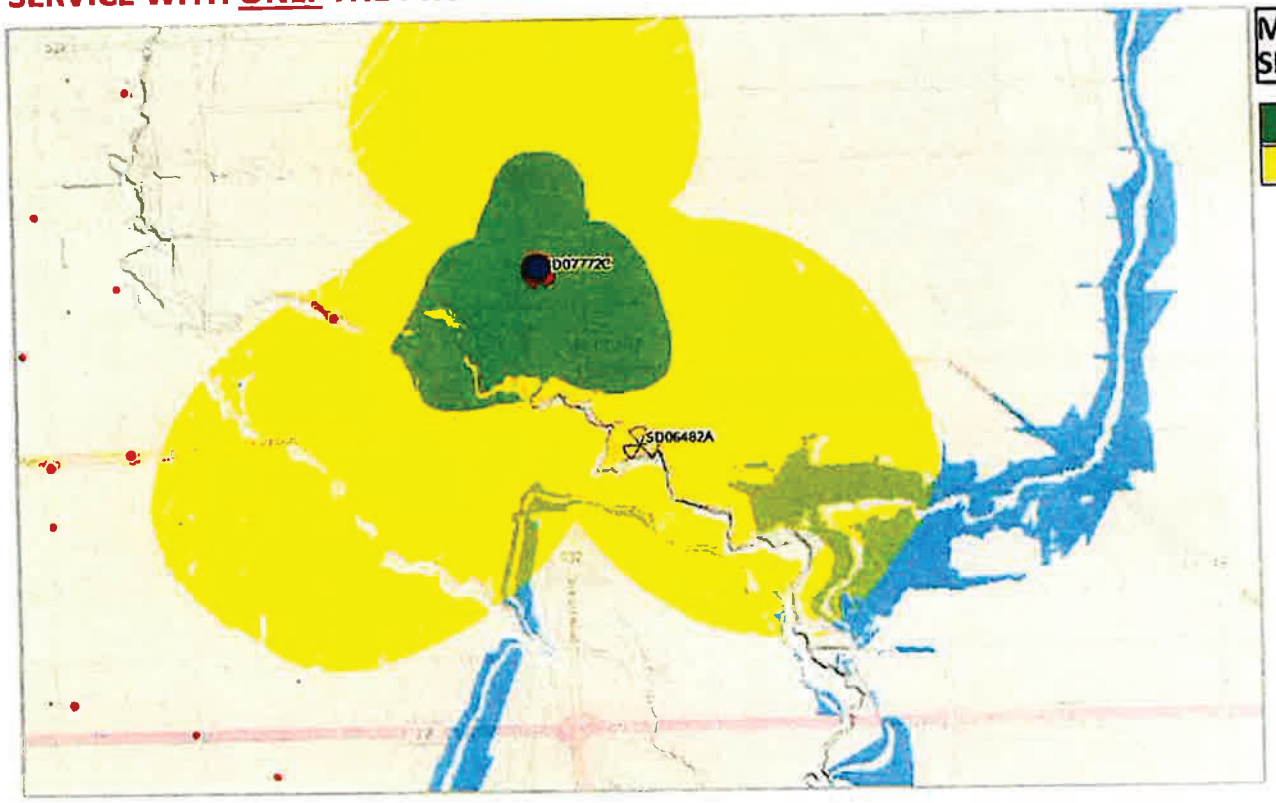
PREDICTION TOOL OUTPUT
SERVICE WITH ONLY THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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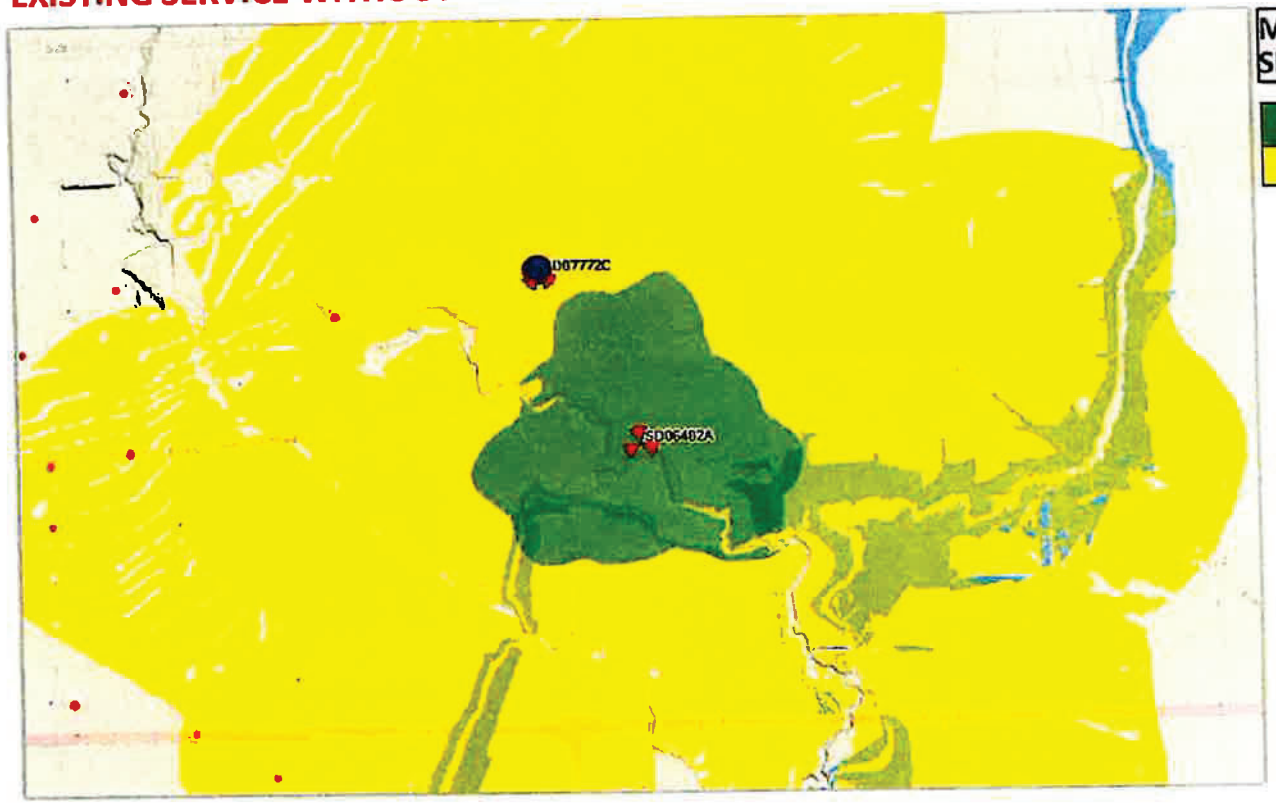
PREDICTION TOOL OUTPUT
EXISTING SERVICE WITHOUT THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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ASSURANCE
DEVELOPMENT

Attachment 16

EME Report

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RADIO FREQUENCY - ELECTROMAGNETIC ENERGY (RF-EME) COMPLIANCE REPORT

Report Type: Antenna Modification/Theoretical

Site ID: SD07772C

Site Name: SD07772C

Address: 1734 E Underwood Rd, Holtville, CA 92250

Date of Calculation: January 14, 2025

Date of Report: January 14, 2025

Latitude: 32.821699 N
Longitude: -115.38638 W



Prepared By:

GTA
Global Technology Associates
Solutions for a Wireless World

EEC ORIGINAL PKG

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1.0 Executive Summary / Report Summary

Purpose of Report

Global Technology Associates (GTA) has been contracted by T-Mobile to conduct radio frequency electromagnetic (RF-EME) modeling for T-Mobile site **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250** to determine RF-EME exposure levels from existing and proposed T-Mobile wireless communications equipment at this site.

This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields. This report contains a detailed summary of the RF-EME analysis for the site.
As described in greater detail in the Section titled **"Federal Communications Commission (FCC) Requirements"** of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general population exposures and occupational exposures. This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

T-Mobile Site Summary			
Site ID	**SD07772C**	Street Address	**1734 E Underwood Rd,**
Site Name	**SD07772C**	City, State, Zip	**Holtville, CA 92250**
Site Type	**monopole**	Latitude	**32.821699 N**
Classification	**general population**	Longitude	**-115.38638 W**
Access Restrictions	**uncontrolled**	Access Type	**wide double swing gate**
Site Description	**all the antennas are mounted on the monopole**		
Max Predictive RF-EME at T-Mobile Facility (General Population)	**8.6% of FCC's general population limit at ground level**		
Max Predictive RF-EME at Ground Level (General Population)	**8.6% of FCC's general population limit**		
Predictive RF-EME Analysis at T-Mobile Facility	**The Proposed Antenna Configuration is In Compliance With FCC Rules & Regulations Upon Completion of the GTA Recommendations.**		

Table 1

A result of over 100% does not make a site out of compliance with FCC guidelines. For predicted EME over 100% of the applicable FCC limit, further remediation (e.g. signage and/or barriers preventing access) is required to consider the site compliant. Areas exceeding the FCC limit are presented with the barriers and appropriate signages. Accessible areas outside the demarcated are the safety zones that have predicted EME values below the FCC's limits. Installation of the recommended mitigation or remediation measures brings the site into compliance. The predictions model antennas as if they are operating at full power, and this assumption yields a worst-case scenario with more conservative results. On-site measurements may yield different results, as antennas do not always operate at full capacity.

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Site ID: SD07772C

Methodology

The site to be determined as the compliance is based on theoretical modeling using the RoofView® modeling tool, appropriate RF signage placement recommendations, proposed antenna inventory as provided by T-Mobile in the construction drawings and the type & level of restricted access to the antennas at the site.

Compliance Statement

T-Mobile's operation at **1734 E Underwood Rd, Holtville, CA 92250** will comply with FCC rules and regulations upon completion of recommendations that include the installation of appropriate RF Safety Signages and/or Barriers as described in Section 8.

Actions for Site Compliance

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance. If required, RF alert signage recommendations have been proposed based on theoretical analysis of MPE levels. Where applicable, barriers can consist of locked doors, fencing, railing, rope, chain, paint striping or tape, combined with RF alert signage.

T-Mobile will be compliant when the following changes are implemented:

T-Mobile proposed Access Point Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Access Point location, as depicted in the site map in the later sections of the report.

T-Mobile proposed Alpha Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Beta Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Gamma Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

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Site ID: SD07772C

T-Mobile proposed Equipment/BTS Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Equipment/BTS location, as depicted in the site map in the later sections of the report.

2.0 MPE Calculations

For this MPE predictive analysis, GTA considered the area around the accessible areas of the T-Mobile antennas on the site to determine EME field strength levels for the FCC's human exposure limits. Further GTA has identified any areas with higher levels exceeding FCC MPE limits and then determined spatially averaged field levels in areas with highest fields.

GTA has utilized computer-generated modeling software RoofView® 4.15 to generate the compliance report.

Modeling & Input Assumptions

In this Site Compliance Report, it is assumed that

- All antennas are operating at full power at all times.
- The Antenna Inventory Table (Section 3) shows all transmitting antennas at the site.
- A 100 % duty cycle and maximum radiated power for each antenna is assumed unless T-Mobile has specified otherwise.
- Obstructions like (screens, trees, buildings, etc.) that would normally attenuate the signal are not taken into account.
- GTA obtained information used in this Compliance Report from T-Mobile which is considered reliable and believes it to be true and correct.
- Due to the complexity of some wireless sites, GTA performed this analysis and created this report utilizing best industry practices and due diligence. The scales and the determinations are based on the A&E drawings provided by T-Mobile.
- On a case-by-case basis, appropriate static gains and losses are considered while doing the simulations to simulate the closest field radiations of the antennas.

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3.0 Antenna Inventory

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
S1A1	L600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L700	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A4	N2500	ERICSSON	AIR6419 B41	0	116.90
S2A2	L600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L700	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A5	N2500	ERICSSON	AIR6419 B41	130	116.90
S3A3	L600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L700	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A6	N2500	ERICSSON	AIR6419 B41	220	116.90

Table 2

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4.0 Federal Communications Commission (FCC) Requirements

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radio frequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general population.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is transient as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

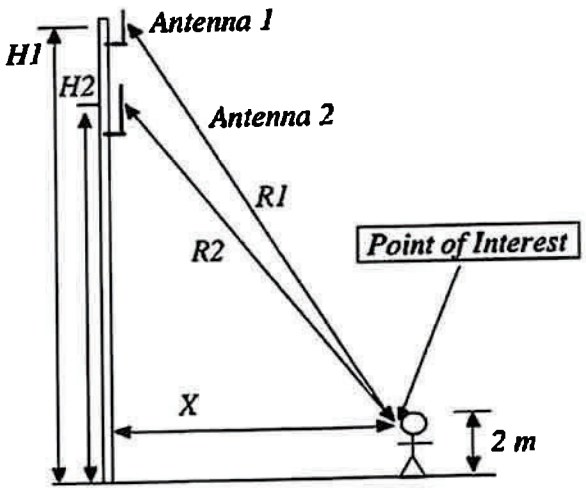

Figure 1

EEC ORIGINAL PKG

Table 3 and Figure 2 (below), which are included in the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm2) and an uncontrolled MPE of 1 mW/cm2 for equipment operating in the 1900 MHz frequency range. For the T-Mobile equipment operating at 800 MHz, the FCC's occupational MPE is 2.66 mW/cm2 and an uncontrolled MPE of 0.53 mW/cm2. These limits are considered protective of these populations.

(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ^{2})	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ^{2})*	6
30-300	61.4	0.163	1	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Population/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ^{2})	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	1842/f	2.19/f	(180/f ^{2})*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

Table 3

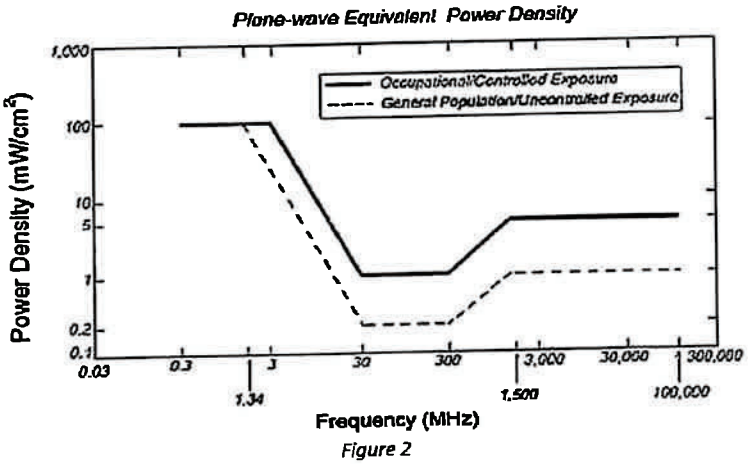

Figure 2

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Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Most Restrictive Freq. Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

Table 4

Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Facilities typically consist of:

1) Electronic transceivers (the radios or cabinets) connected to wired telephone lines; and
2) Antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, except in areas directly in front of the antennas.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 100% of the applicable MPE must participate in mitigating these RF hazards.

5.0 Limitations

This report was prepared for the use of T-Mobile. It was performed following generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under similar circumstances. The conclusions provided by GTA are based solely on the information provided by T-Mobile. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to GTA so that our conclusions may be revised and modified, if necessary. This report has been prepared by Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

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6.0 Safety Recommendations

Occupational Safety and Health Administration (OSHA) Requirements

OSHA requires that those in the Occupational classification must complete training in RF Safety, RF Awareness, and Utilization of Personal Protective Equipment. OSHA also provides options for Hazard Prevention and Control:

Hazard Prevention	Control
• Utilization of good equipment • Enact control of hazard areas • Limit exposures • Employ medical surveillance and accident response	• Employ Lockout/Tag out • Utilize personal alarms & protective clothing • Prevent access to hazardous locations • Develop or operate an administrative control program

Table 5

RF Signage and Barriers

All RF signs should be obeyed by at all times.



Figure 3

If there are workers in an area with a sign that they do not understand, they can call the NOC Number at 877-611-5868 for guidance.

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7.0 Federal Communications Commission (FCC) Limits

Contribution to Co-Located areas

Any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance. All co-located sites should have a separate 5% modeling that shows only T-Mobile antennas transmitting. This separate modeling indicates T-Mobile's contribution in all areas that is recognized to be greater than 100% MPE limits.

Occupational Limits

Apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

General Population limits

Apply in situations in which the general population may be exposed, or in which persons who are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. (Those without significant and documented RF Safety & Awarenesstraining)

Controlled Environment

This applies to environments that are restricted or "controlled" to prevent access from members of the General Population classification.

Uncontrolled Environment

This applies to environments that are unrestricted or "uncontrolled" that allow access from members of the General Population classification.

Generic Values

The use of "Unknown" for an operator means the information about the carrier, their FCC license, and/or antenna information was not available. Generic values are used as estimation for Effective Radiated Power (ERP) and antenna characteristics for unknown antennas.

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8.0 Compliance Measures

The site needs the following mitigation and/or compliance plan.

The compliance determination is based on theoretical modeling, RF signage placement recommendations, proposed antenna inventory and the level of restricted access to the antennas at the site. At the time of our analysis, T-Mobile will be complaint with the FCC rules and regulations, as described in OET Bulletin 65 upon implementation of below remediation and/or compliance recommendations.

On monopole :

Recommendations for Site Compliance	Signages on Access Points, Sectors & Equipment										Enclosing Sectors					
																	
	Guidelines		NOC INFO		NOTICE		CAUTION		WARNING		NOTICE		CAUTION		WARNING		OC Length	GP Length	Striping
Access Point(s)	✓	1	✓	1	✓	1													Striping
Sector Alpha							✓	1											Striping
Sector Beta							✓	1											Striping
Sector Gamma							✓	1											Striping
Equipment/BTS	✓	1	✓	1	✓	1													Striping
Total Signage	2		2		2		3		0		0		0		0		0 sq. ft.	0 sq. ft.	Total =0 sq.ft.

Table 6

CAUTION: - The table above represents EVERY compliance item that MUST be implemented by the carrier at the site location; please see the Site Plan shown in diagram 1.

It is recommended to have periodic inspections of the components that are involved in the radiation of RF energy. Periodic Electromagnetic Emission (EME) measurement should be conducted to reevaluate the RF radiation level at this site.

GTA recommends that T-Mobile and the authorized personal at the site take additional measures to ensure that persons accessing the roof (for example, roofers or other maintenance workers) are informed of areas where RF levels exceed the FCC general population limit and made aware that these areas must be avoided to maintain compliance with FCC requirements. This is important especially when the placement of barriers, striping, taping, or any other positive access control (areas of the roof that exceed the RF levels of the general population limit) is not possible due to the physical construction or constraints or safety measures surrounding the antennas or on the roof like the sloped roof, tiled roof, chimney, steeples, cupolas, hilly terrain, etc.

It is further recommended to distribute this report to anyone accessing the roof and ensure the confirmation that it has been read and understood.

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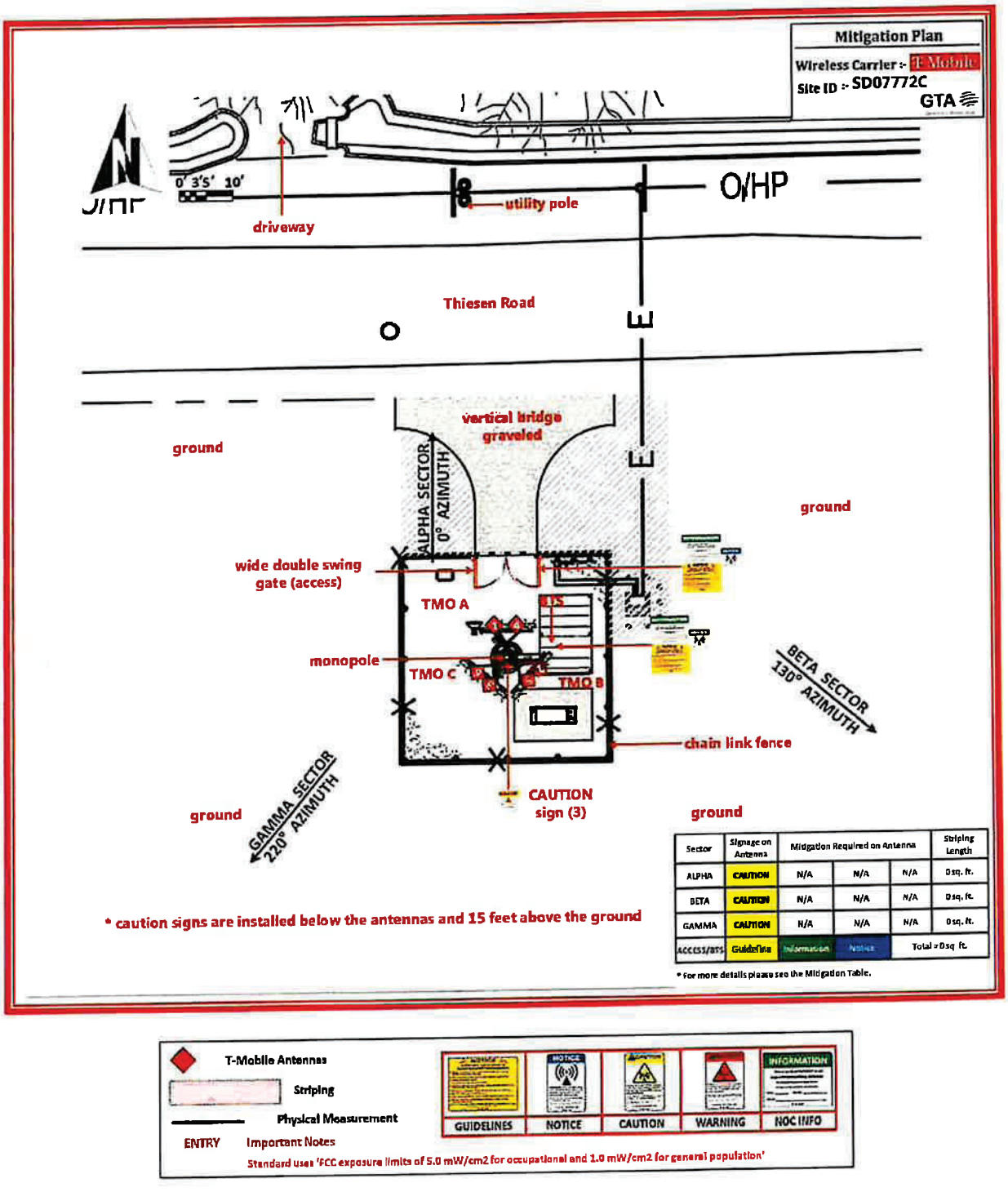
Site ID: SD07772C

Diagram 1: Site Scale Plan



Sector	Signage on Antenna	Mitigation Required on Antenna			Striping Length
ALPHA	CAUTION	N/A	N/A	N/A	0 sq. ft.
BETA	CAUTION	N/A	N/A	N/A	0 sq. ft.
GAMMA	CAUTION	N/A	N/A	N/A	0 sq. ft.
ACCESS/RFS	Guideline	Information	Notice		Total = 0 sq. ft.

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9.0 Summary And Conclusions

GTA has prepared this Radiofrequency Emissions Compliance Report for the proposed T-Mobile telecommunications equipment at the site located at **1734 E Underwood Rd, Holtville, CA 92250.**

GTA has conducted theoretical modeling to estimate the worst-case power density from T-Mobile antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements.

As presented in the preceding sections, based on worst-case predictive modeling, **there are no modeled exposures on any accessible ground-level walking/working surface** related to proposed equipment in the area that exceed the FCC's **general population** exposure limits at this site. Any of the modeled exposure areas exceeding the **general population** limits need to follow the mitigation/compliance plan proposed in the report to bring the T-Mobile antennas to compliance. As such, the proposed T-Mobile project complies with FCC rules and regulations. **Posting of the signages and the recommendations** presented in Section 8 **brings the site into compliance with FCC rules and regulations.**

At ground-level the anticipated maximum predictive RF-EME at T-Mobile facility will be 8.6% of FCC's general population limit. This was determined through calculations along a radial from each sector taking full power values into account as well as actual vertical plane antenna gain values per the manufacturer-supplied specifications for gain. Based on worst-case predictive modeling, there are no areas at ground level related to the proposed antennas that exceed the FCC's occupational or general population exposure limits at this site. **At ground level, the maximum power density generated by the antennas is approximately 8.6% of FCC's general population limit (1.72% of the FCC's occupational limit).**

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

Modeling indicates that there will be no accessible areas on the walking/working surfaces at the ground-level in front of the T-Mobile antennas that may exceed the FCC standards for the general population and/or occupational exposure after the implementation of mitigation measures. To reduce the risk of exposure and/or injury, GTA recommends that access to the **monopole** or areas associated with the active antenna installation or mitigation measures are restricted and secured where possible.

To alert any workers or general population potentially accessing the site, a blue Notice sign and/or yellow Caution sign, and/or orange Warning sign based on the simulated exposure limits along with a yellow Guidelines sign are recommended for installation at the access to the rooftop/structure along with the barriers/striping to exclude the RF radiations exceeding areas per the applicable limits.

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10.0 Certification

This report has been prepared under the direction of the following Registered Professional Engineer:

I **Michael A. McGuire PE**, on the date indicated near my seal below hereby certify that:

I am registered as a Professional Engineer with the License number listed below and I am thoroughly familiar with the Regulations of the Federal Communication Commission (FCC), both in general and specifically, as they apply to FCC guidelines for human exposure to Radiofrequency electromagnetic radiation and the EME predictive analysis for the site identified as **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250**, has performed on **January 14, 2025** to determine where there might be electromagnetic energy that is more than both the Controlled Environment and Uncontrolled Environment levels; and that I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge.



sealed 20jan2025

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DEVELOPMENT

Attachment 17

Co-Location Letter of Intent

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Vertical Bridge Holdings, LLC
750 Park of Commerce Drive Suite 200
Boca Raton FL 33487
561 948-6367
VerticalBridge.com

December 23, 2024

Imperial County
Planning and Land Use Division
801 Main St.
El Centro, CA 92243

Re: VB BTS III, LLC Telecommunication Tower Application (Parcel ID # 045-600-017)
Site Name and Number: Holtville / US-CA-5363

To Whom it May Concern:

By this letter of intent, VB BTS III, LLC, as the proposed owner of the tower, commits to allowing the shared use of the tower for co-location of other antennae, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-locating company.

We appreciate your time and attention to this matter.

Sincerely,

VB BTS III, LLC.

By: _____
Name: Randy Wilson
Title: Vice President Development
Date: 1/6/25

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Vertical Bridge Holdings, LLC
750 Park of Commerce Drive Suite 200
Boca Raton, FL 33487
561-948-6367
VerticalBridge.com

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 6th day of January, 2025, by means of ☐ physical presence or ☐ online notarization by VB BTS II, LLC, a Delaware limited liability company.

Jeanne M Bruning
Signature of Notary Public

Jeanne M Bruning
Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known ✓ OR Produced Identification _____

JEANNE M. BRUNING
MY COMMISSION # HH 469847
EXPIRES: April 20, 2028

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Attachment 18

FAA TOWAIR Report

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Federal Aviation Administration

Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V_2018 2 0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference CFR Title 14 Part 77.9.

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the Air Traffic Areas of Responsibility map for Off Airport construction, or contact the FAA Airports Region / District Office for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

* **Structure Type:**	TOWER | Antenna Tower Please select structure type and complete location point information.
Latitude:	32 Deg 49 M 18.25 S N
Longitude:	115 Deg 23 M 10.98 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	22 (nearest foot)
Structure Height :	130 (nearest foot)
Is structure on airport:	(●) No ( ) Yes

Results

You do not exceed Notice Criteria.

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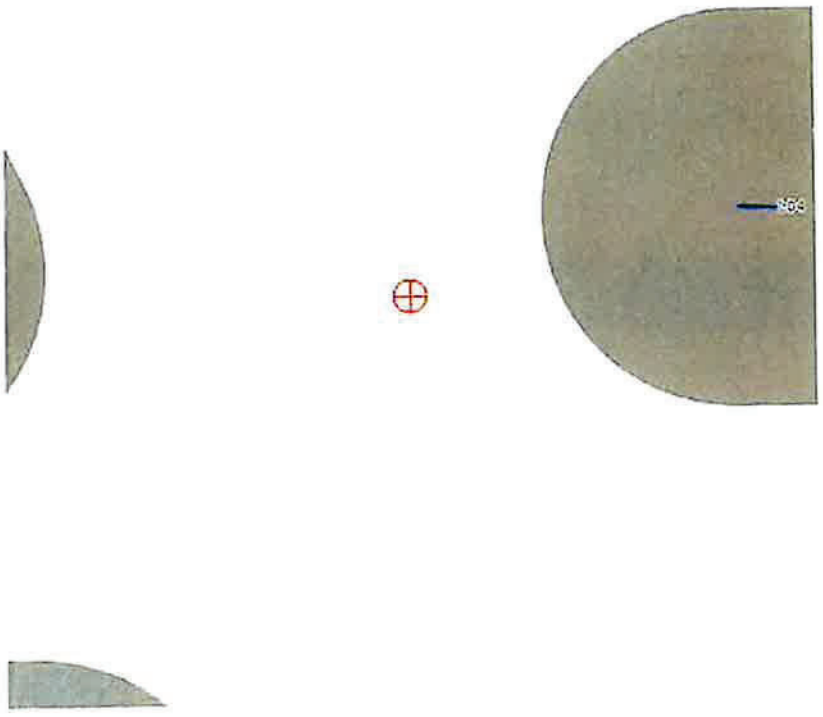

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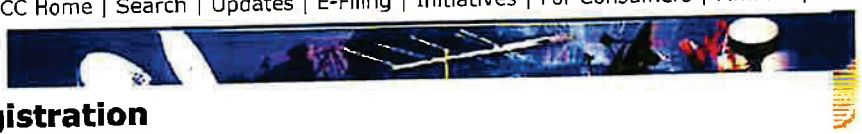

Antenna Structure Registration

TOWAIR Determination Results

HELP

New Search Printable Page

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates	
Latitude	32-49-18.2 north
Longitude	115-23-10.9 west
Measurements (Meters)	
Overall Structure Height (AGL)	39.6
Support Structure Height (AGL)	36.6
Site Elevation (AMSL)	6.7
Structure Type	
MTOWER - Monopole	

Tower Construction Notifications
Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Phone: 1-877-480-3201
TTY: 1-717-338-2824
Submit Help Request

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