

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE
FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA DATE: June 25, 2026
AGENDA TIME: 1:30PM / No. 1

PROJECT TYPE: The Towers, LLC
CUP #26-0006 / IS #26-0007 SUPERVISOR DIST # 4
LOCATION: 307 E Winslow Rd. APN: 003-200-035-000
Niland, CA 92257 PARCEL SIZE: +/-124.44 AC

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

ZONE (existing) A-2-RE (General Agricultural with Renewable Energy 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

ENVIRONMENTAL EVALUATION COMMITTEE DECISION:

HEARING DATE: 06-25-2026

INITIAL STUDY: #26-0007

☒ 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		

Quechan Indian Tribe, Agua Caliente Band of Cahuilla Indians, IID

REQUESTED ACTION:

(See Attached)

☒ **NEGATIVE DECLARATION**
☐ **MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis
For:*

**Conditional Use Permit #26-0006
Initial Study #26-0007
The Towers, LLC**



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
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June 2026

EEC ORIGINAL PKG

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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 #26-0006 (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

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 ENVIRONMENTAL 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

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

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

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 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.

II. *Environmental Checklist*

1. **Project Title:** Conditional Use Permit #26-0006 / Initial Study #26-0007
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** Isara Galvez, Planner I, Rocio Yee, Planner II
(442)265-1736
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** isaragalvez@co.imperial.ca.us, rociyee@co.imperial.ca.us
6. **Project location:** 307 E Winslow Rd., Niland, CA 92257; Assessor's Parcel Number (APN) 003-200-035-000
7. **Project sponsor's name and address:** The Towers, LLC
8. **General Plan designation:** Agriculture
9. **Zoning:** A-2-RE (General Agriculture with a Renewable Energy Overlay)
10. **Description of project:**

The applicant, The Towers, LLC, is proposing to build a Wireless Communications Facility (WCF) at 307 E Winslow Rd., Niland, CA 92257, which consists of a 120-foot-tall monopole tower and related equipment within a 50-foot by 50-foot leased and fenced area at the northwest portion of the above-mentioned parcel. The proposed WCF would be developed, constructed, owned, and operated by The Towers, LLC. The proposed tower is located within the A-2-RE Zone, in which Communication Towers are allowed upon approval of a Conditional Use Permit (CUP #26-0006) under Title 9, Division 5, Chapter 8, Section 90508.02 (r).

According to the applicant, the proposed WCF is designed to house the equipment necessary to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Imperial County, more specifically within Calipatria along Highway 111. The tower would contain Verizon equipment with two (2) MX08FIT665-02E antennas, two (2) AIR3283 antennas, two (2) AIR6419 antennas, two (2) 4490 RRU's, one (1) 6' microwave, two (2) OVP boxes, one (1) GPS antenna, required antenna cabling, and HCS jumpers. The 2,500 sq. ft. lease area will be surrounded by a 6-foot-high chain link fence. Space for the future co-location of two additional wireless carriers has been made available on the proposed tower as encouraged under Title 9, Division 24.

The ground equipment will also be contained within the fenced area, including (2) Ground Mounted Radio Cabinets, (1) Equipment Canopy, (1) Fiber Box, (1) 200A ILC Cabinet, (1) Manual Service Light Switch Timer, (3) Service Lights, (1) Back-Up Diesel Generator, (2) Raised Concrete Pads, Cable Ice Bridge, Utility Backboard And Multi-Meter Utility Service mounted on concrete pad. Access to the lease area is being proposed to be a 180-ft-long and 12-ft-wide gravel road.

A proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area. Water and sewer services are not required for the proposed facility.

11. **Surrounding land uses and setting:** The proposed wireless communication facility would be located at 307 E Winslow Rd., Niland, CA 92257 and would occupy approximately 2,500 sq. ft. of the 124.44-Acre subject parcel. The property is identified as Assessor's Parcel Number (APN) 003-200-035-000 and is further described as LOTS 3 & 4 & SE1/4 OF NW1/4 SEC 19 T10S R14E 124.44 AC. The proposed project site is surrounded by parcels zoned as A-2-RE (General Agriculture with a Renewable Energy Overlay) to the North, East, South and West. The proposed project is consistent with the A-2-RE zone upon approval of a Conditional Use Permit (Division 5, Section 90508.02 (r)).

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 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 confidentiality, etc.?

The Quechan Indian Tribe, Campo Band of Mission Indian Tribe and Agua Caliente 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 23, 2026. The County received on April 24, 2026, an email response from the Quechan Indian Tribe advising they had no comments for this project. Additionally, on April 24, 2026, the Agua Caliente Band of Cahuilla Indians Tribe submitted a request for government-to-government consultation regarding the proposed project. In response, Imperial County Planning & Development Services (ICPDS) coordinated and conducted a consultation meeting via Zoom on May 20, 2026, to discuss the project and provide clarification on its scope and details. During the consultation, the applicant committed to providing the Tribe with the relevant environmental and cultural resource documentation once those studies are completed. Furthermore, the applicant agreed to maintain ongoing communication with the Tribe and provide updates regarding project developments, findings, and any additional information as it becomes available throughout the review process.

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.

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

PUBLIC WORKS
ENVIRONMENTAL HEALTH SVCS
OFFICE EMERGENCY SERVICES
APCD
AG
SHERIFF'S DEPARTMENT
ICPDS

YES

☒
☒
☒
☒
☒
☒
☒
☒

NO

☐
☐
☐
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☐
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☐
☐

ABSENT

☐
☒
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☐
☐
☐
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for *phlsh*
Jim Minick, Director of Planning/EEC Chairman

Date: *6-25-2026*

PROJECT SUMMARY

- A. Project Location:** The proposed wireless communication facility would be located at 307 E Winslow Rd., Niland, CA 92257; Assessor's Parcel Number (APN) 003-200-035-000.
- B. Project Summary:** The applicant, The Towers, LLC, is proposing to build a Wireless Communications Facility (WCF) at 307 E Winslow Rd., Niland, CA 92257, which consists of a 120-foot-tall monopole tower and related equipment within a 50-foot by 50-foot leased and fenced area at the northwest portion of the above-mentioned parcel. The proposed WCF would be developed, constructed, owned, and operated by The Towers, LLC. The proposed tower is located within the A-2-RE Zone, in which Communication Towers are allowed upon approval of a Conditional Use Permit (CUP #26-0006) under Title 9, Division 5, Chapter 8, Section 90508.02 (r).

According to the applicant, the proposed WCF is designed to house the equipment necessary to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Imperial County, more specifically within Calipatria along Highway 111. The tower would contain Verizon equipment with two (2) MX08FIT665-02E antennas, two (2) AIR3283 antennas, two (2) AIR6419 antennas, two (2) 4490 RRU's, one (1) 6' microwave, two (2) OVP boxes, one (1) GPS antenna, required antenna cabling, and HCS jumpers. The 2,500 sq. ft. lease area will be surrounded by a 6-foot-high chain link fence. Space for the future co-location of two additional wireless carriers has been made available on the proposed tower as encouraged under Title 9, Division 24.

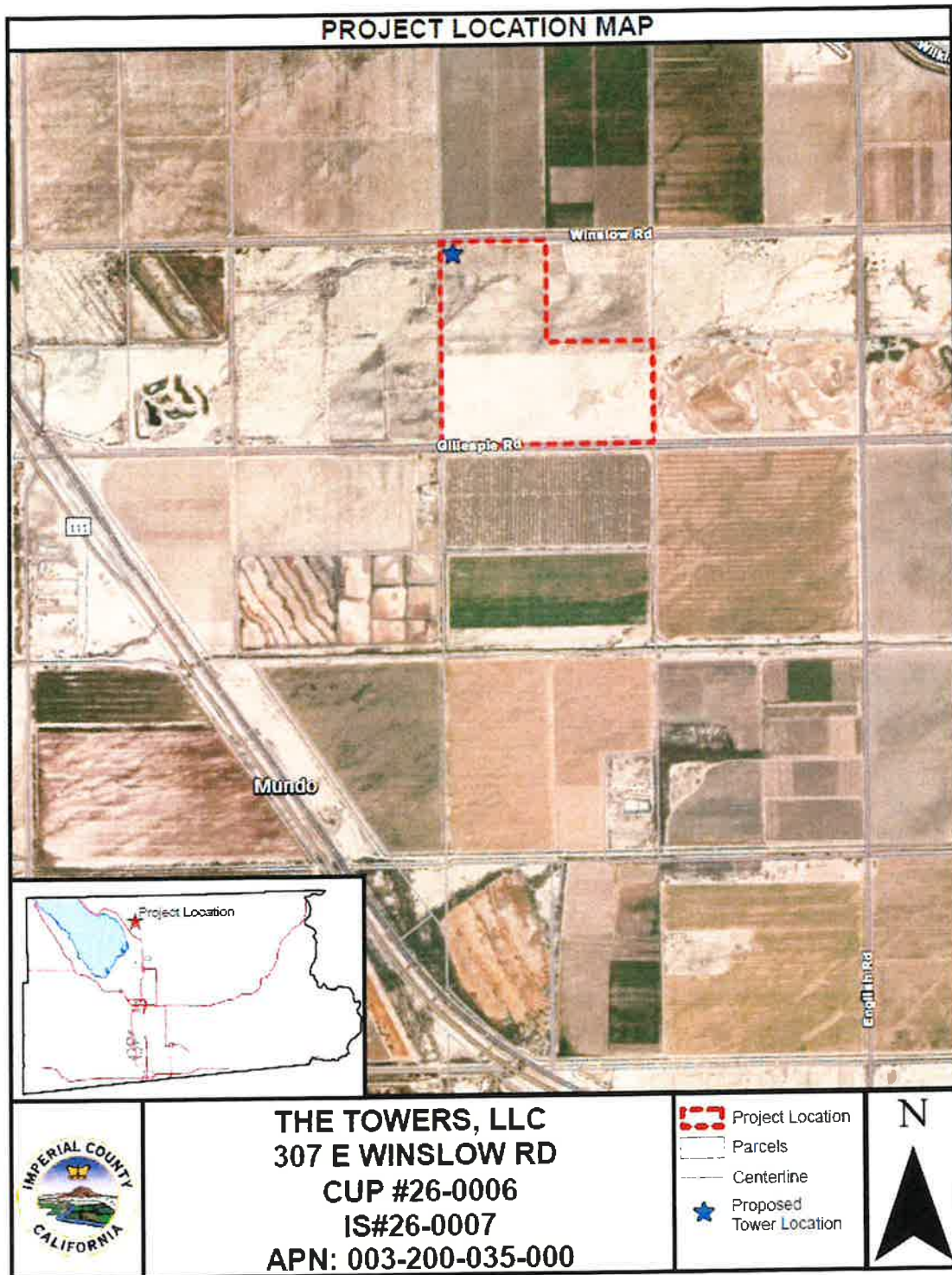
The ground equipment will also be contained within the fenced area, including (2) Ground Mounted Radio Cabinets, (1) Equipment Canopy, (1) Fiber Box, (1) 200A ILC Cabinet, (1) Manual Service Light Switch Timer, (3) Service Lights, (1) Back-Up Diesel Generator, (2) Raised Concrete Pads, Cable Ice Bridge, Utility Backboard And Multi-Meter Utility Service mounted on concrete pad. Access to the lease area is being proposed to be a 180-ft-long and 12-ft-wide gravel road.

A proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area. Water and sewer services are not required for the proposed facility.

- C. Environmental Setting:** The proposed project site is located within a parcel that consists primarily of vacant undeveloped land, zoned as A-2-RE (General Agriculture with Renewable Energy Overlay). The proposed project site is relatively flat, located towards south of Winslow Rd and north of Gillespie Road, +/- 1.3 miles east of Highway 111 in an unincorporated portion of the County of Imperial, approximately 4.3 miles northwest from Niland and 11.5 miles northwest from the City of Calipatria.
- D. Analysis:** The proposed project consists of the installation of a 120-foot monopole communication tower within a 50-foot by 50-foot leased and fenced area, along with associated remote unmanned equipment. The proposed tower height complies with the maximum height limit of the A-2-RE (General Agriculture–Renewable Energy Overlay) Zone, which allows communication towers up to 120 feet in height. The project was voluntarily submitted to the Airport Land Use Commission for review on June 17, 2026, and was found to be consistent with the 2026 Airport Land Use Compatibility Plan. Initial Study #26-0007 will evaluate potential impacts associated with 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-2-RE zone under an approved Conditional Use Permit (Division 5, Section 90508.02(r)), 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 communications tower would be situated approximately 4.14 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #1182-95.

Exhibit "A"

Vicinity Map



EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information source. 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

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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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) The project site is located at 307 E Winslow Rd., Niland, CA, approximately 1.26 miles from State Route 111 (SR-111), according to the Imperial County General Plan Circulation and Scenic Highway Element and California State Scenic Highway System Map, SR-111 travels along the northeast shore of the Salton Sea and is eligible for future Scenic Highway Designation from Bombay Beach to the County line, the project is not within this portion of SR-111. Additionally, the proposed communication tower would be constructed of galvanized steel to reduce visual obstructiveness and blend with the surrounding sky. All tower-mounted antennas and ground equipment would be treated to reduce or eliminate reflective glare. For reference, the applicant has submitted "Attachment 10, Photo Simulations" for a visual simulation of the proposed tower. Additionally, Imperial County Planning & Development Services requires all communication towers to be equipped with aircraft warning lights. At a minimum, the tower shall include a light at the top and another at the midpoint of the structure. The permittee shall install a white medium-intensity strobe beacon for daytime use and a red flashing warning light for nighttime use to alert aircraft operating in the vicinity. Evidence of compliance with these requirements shall be submitted within six (6) months of CUP approval. Compliance with these conditions will reduce potential impacts to a less than significant.
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway? ☐ ☐ ☒ ☐
- b) The proposed project site is located on generally flat terrain and does not contain, or is it located in proximity to, any significant scenic resources such as trees, rock outcroppings, or historic buildings. Furthermore, as discussed in Section I(a), the project site is not situated within or adjacent to a designated or eligible scenic highway corridor, nor is it located near a scenic vista. Therefore, implementation of the proposed project would not substantially damage or adversely affect scenic resources. As a result, less than significant impacts are anticipated.
- 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 WCF would be constructed of galvanized steel to reduce visual obstructiveness and blend with the surrounding sky and would not significantly or physically degrade the visual character or quality of public views 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). Under the Imperial County General Plan, the land use designation of the subject location is "Agriculture", it is not within an urbanized area. Therefore, less than significant 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 WCF would be constructed of galvanized steel to reduce visual obstructiveness and blend with the surrounding sky 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. The applicant is proposing two service lights on site that will only be utilized during site maintenance visits or in case of an emergency. According to the comments received from the Imperial County Agricultural Commissioner's Office on May 29, 2026²⁹, the proposed WCF would not be required to install aviation warning lighting based on the proposed height, however, on June 17, 2026, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed WCF project and found it to be consistent with the 2026 Airport Land Use Compatibility Plan, and confirm on record that the Planning Department requires all communication towers to be equipped with aircraft warning lights, at a minimum, the tower shall include a light at the top and another at the midpoint of the structure, the permittee shall install a white medium-intensity strobe beacon for daytime use and a red flashing warning light for nighttime use to alert aircraft operating in the vicinity. Therefore, impacts related to airport hazards or aviation safety would be less than significant. Compliance with FAA and ALUC standards would bring any impact to less than significant.

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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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 site is designated as "Farmland of Local Importance" according to the California Important Farmland Finder: Imperial County 2018³. The proposed WCF would occupy a 50-foot by 50-foot leased and fenced area in the northwestern portion of the parcel that is currently vacant and undeveloped; therefore, the project would not convert any type of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. Less than significant 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 Finder⁴, Imperial County did not participate in the 2025 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 in section (II)(a), the proposed WCF would occupy a 50-ft by 50-ft leased and fenced area in the northwestern portion of the parcel that is currently vacant and undeveloped. The current land use designation per Imperial County General Plan Land Use Map⁵ is "Agriculture" 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, less than significant impacts are 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 use. 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 in section (II)(a) the proposed WCF would occupy a 50-foot by 50-foot leased and fenced area in the northwestern portion of the parcel that is currently vacant and undeveloped. The proposed site is designated as "Farmland of Local Importance" per the California Important Farmland Finder: Imperial County 2018, and the land use designation is "Agriculture" under the Imperial County General Plan Land Use Map⁵. The remainder of the parcel could continue to be used for agricultural purposes. The project does not involve other changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, less than significant 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 Communication Facility located within a 50-ft by 50-ft sq. ft.**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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leased and fenced area, on the undeveloped northwestern portion of the subject parcel. It is not expected that the proposed project will conflict with or obstruct implementation of the applicable air quality plan. According to the Imperial County Air Pollution Control District's (ICAPCD) comment letter dated May 7, 2026⁶, the project must adhere to Regulation VIII. Regulation VIII is a collection of rules designed to limit emissions of fugitive dust (PM₁₀) to no more than 20%. The proposed project must adhere to Rule 801- Construction and Earthmoving and, Rule 805- Paved and Unpaved Roads; a Construction Notice must be submitted to the ICAPCD at least 10 days prior to the start of earthmoving. The applicant would be required to contact the Permitting & Engineering Division of the APCD to obtain a permit for the proposed backup diesel generator. Compliance with ICAPCD regulations and requirements would reduce potential impacts 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 WCF 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 considerably increasing any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, any impacts are expected to be less than significant.

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

c) The proposed WCF would not expose sensitive receptors to substantial pollutant concentrations. The proposed project would generate only temporary construction-related emissions and would not result in a long-term source of air pollutants affecting the nearest sensitive receptors. The nearest residentially zoned property is located approximately 4.2 miles southeast of the project site in Niland. However, the nearest residence is located on the adjacent parcel to the west, approximately 280 feet from the project site. Therefore, compliance with ICAPCD rules and regulations would reduce potential impacts to less than significant. 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 is not expected to create additional emissions that would generate odors adversely affecting a substantial number of people. Although some pollutants may be emitted during construction activities, as discussed in Section III(a) above, compliance with APCD Regulation VIII and other applicable rules would reduce any potential 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 would be located within a 50-ft by 50-ft. leased and fenced area, on the undeveloped northern portion of the parcel. According to the Imperial County General Plan's Conservation and Open Space Element⁷, Figure 1 "Imperial County Sensitive Habitats" Map^{7a} the project is not located within a sensitive habitat area. Additionally, in accordance to Figure 2 "Imperial County Sensitive Species" Map^{7b} and the Department of Fish and Wildlife Predicted Habitat Map⁸, 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: Siting 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. However, the proposed project involves a 120-foot-tall monopole 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 standards and regulations should reduce any impacts to less than significant.

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 Element⁷; 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. Potential 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 Map¹⁰, National Water Information System: Mapper¹⁰, and California Sustainable Groundwater Management Act (SGMA) Data Viewer¹², 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. Potential 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) As previously stated on item (IV)(b) above, the proposed WCF 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. Less than significant 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 Element⁷; 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.	☐	☐	☒	☐

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 Element⁷, Figure 5 "Areas of Heightened Historic Period Sensitivity Map^{7d}," the proposed project site is located near the Williamson and Blake 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 a known area of cultural sensitivity to Native Americans. Under Assembly Bill 52, consultation letters were sent to the Quechan Indian Tribe, Campo Band of Mission Indian Tribe and Agua Caliente Tribe. As a result, a government-to government consultation meeting was conducted between the Imperial County and the Agua Caliente Band of Cahuilla Indians Tribe. During the consultation, the applicant committed to providing the Tribe with the relevant environmental and cultural resource documentation once those studies are completed. Therefore, as for now there is no record that the proposed project would not cause a substantial adverse change in the significance of historical resources. Any impact would be less than significant.**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? b) The proposed WCF would occupy a 50-foot by 50-foot leased and fenced area in the northwestern portion of the parcel that is currently vacant and undeveloped. The proposed wireless telecommunication facility project is not expected 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) The proposed WCF is not located within or adjacent to any cemeteries and would not disturb any human remains, including those interred outside of dedicated cemeteries. According to the California Health and Safety Code § 7050.5 (b),(c)²⁷, in the event of 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 has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of any death. 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 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 WCF would be located within a 50-ft by 50-ft. leased and fenced area, in the undeveloped northern portion of the parcel and it is not expected to result in potentially significant environmental impact due to wasteful, insufficient, or unnecessary consumption of energy resources, during the project construction or operation. The WCF 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, pursuant to the comment letter received from the Imperial Irrigation District (IID) dated May 7, 2026¹³, if the proposed communication tower requires electrical service, the applicant shall comply with all applicable IID rules and regulations. Therefore, any impacts are anticipated 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, would be located within a 50-ft by 50-ft. leased and fenced area, in the undeveloped northern portion of the parcel. According to the Imperial County Renewable Energy Overlay and Plant Locations²⁸ the project site is located within the Renewable Energy overlay. Any future development associated with the project would be required to comply with all applicable energy efficiency and renewable energy regulations, including the California Building Standards Code and any standards in effect at the time of permit issuance and construction. Therefore, the proposed project would 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.

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 WCF does not appear to conflict with the geology and soils of the portion of the subject parcel where it would be located. The proposed tower would be required to obtain all necessary building permits prior to construction and comply with the latest edition of the California Building Code. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death. Compliance with 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: Fault Activity Map¹⁴, United States Geological Survey's Quaternary Faults Map, Imperial County General Plan Seismic and Public Safety Element¹⁶, Figure 2 "Regional Fault Lines", the proposed project site is not located within a known fault zone. The nearest Fault Zone is the Hot Springs Fault Zone approximately 6.9 miles from the project site. Although the Brawley Seismic Zone is located approximately 7 miles west of the proposed project site, all development within Imperial County must comply with the seismic design

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
requirements of Section 1613 et seq. of the California Building Code. Compliance with these standards and regulations would bring any impact to less than significant.				
2) Strong Seismic ground shaking? 2) As previously stated in Item (VII)(a)(1) above, the proposed project is located approximately 16.9 miles west of the Brawley Seismic Zone; therefore, seismic ground shaking could be expected. The project would be required to obtain all necessary building permits prior to construction and comply with the latest edition of the California Building Code. Compliance with these requirements would reduce potential impacts to less than significant.	☐	☐	☒	☐
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. 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 risk area. The topography within the proposed project site is generally flat. 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 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 or soil that would become unstable or collapse as a result of the proposed WCF. 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 reduce potential impacts 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" the proposed project site is not located on expansive soil that could create creating substantial direct or indirect risk to life or property. However, as previously stated in Section VII(c), the proposed WCF design and construction will require compliance with the latest edition of the California Building Code, as well as review through a ministerial building permit process, which would reduce potential 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 Wireless Communication Facility (WCF) would not require sewer service. The project would not involve soils incapable of supporting septic tanks or alternative wastewater disposal systems where sewer service is not available. Additionally, should any septic systems be proposed in the future, the applicant would be required to comply with the standards and regulations of the Imperial County Public Health Department, Division of Environmental Health. Therefore, no impact is expected.	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? f) The proposed project 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 the applicant shall contact a qualified paleontological specialist to inspect the site. Any impacts are expected to be less than significant.	☐	☐	☒	☐

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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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 Wireless Communication Facility would be located on an area surrounded by parcels already impacted by 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, the proposed project would generate only temporary construction-related emissions and would not result in a long-term source of air pollutants affecting the nearest sensitive receptors. Therefore, compliance with ICAPCD rules and regulations would reduce potential impacts 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 reducing the emissions of greenhouse gases to 1990 levels by 2020 provided that the applicant adheres to ICAPCD's regulations and requirements. Less than significant impact is 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 the Environmental Health Services Department. Compliance with Environmental Health Services Department (EHS) and Air Pollution Control District (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 Environmental Health Services Department (EHS) and Air Pollution Control District (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 closest school within the vicinity of the proposed project site is located outside a one-quarter (1/4) of a mile radius from the project site southeast, which is the Grace Smith Elementary School located approximately 4.54 miles 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. Less than significant 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 or within any of the listed facilities from page 35 of the Imperial County General Plan: Seismic and Public Safety Element¹³; therefore, less than significant impacts are expected.**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 Maps²⁰, therefore, it would result in a safety hazard or excessive noise for people residing or working in the project area. Additionally, on June 17, 2026, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed WCF and found it to be consistent with the 2026 Airport Land Use Compatibility Plan. Less than significant impact is expected.	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? 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 – Imperial County Map"²¹, 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.	☐	☐	☒	☐

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 operation of a Wireless Communication Facility and according to the applicant, no water service would be required for operational purposes, and minimal water would be needed for construction. Additionally, the applicant shall comply with any applicable requirements of the Air Pollution Control District (APCD) other than the mentioned in the comment letter received on May 7, 2026⁶. Therefore, the proposed WCF would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Potential 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 Wireless Communication Facility would not require water service for operational purposes and minimal water would be needed for construction. Therefore, the project 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. Additionally, the applicant shall comply with any applicable requirements of the Air Pollution Control District (APCD), other than the mentioned in the comment letter received on May 7, 2026⁶. Potential 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 of a stream or river or through the addition of impervious surfaces. Additionally, per comment letter received from the Imperial Irrigation District dated May 7, 2026¹³, to ensure there are no impacts to IID Water Department facilities the project's plans are to be submitted to IID Water Department Engineering Services Section prior to final project design, additionally an IID encroachment permit or agreement that encompasses all IID permits is required. Furthermore, according to the Imperial County Department of Public Works comment letter dated May 7, 2026²⁶ a Grading Plan or a Drainage and Grading letter prepared by a California Licensed Civil Engineer | ☐ | ☐ | ☒ | ☐ |

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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is required to be submitted to provide property grading and drainage control and prevent damage to adjacent properties. Compliance with ICDPW and IID requirements would reduce potential impacts to less than significant.

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

(i) The proposed WCF is not located within areas that are more susceptible to erosion, according to Imperial County General Plan's Seismic and Public Safety Element¹³, Erosion (page 15). The project site is generally flat and would experience low rates of erosion. Additionally, as previously stated in section (X)(c) above, the Applicant shall submit a Drainage and Grading Plan to provide property grading and drainage control and prevent damage to adjacent properties. Therefore, compliance with ICDPW requirements would reduce potential impacts 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 stated on section (X)(c) above, the Applicant shall submit a Drainage and Grading Plan to provide for property grading and drainage control and prevent damage to adjacent properties. Compliance with the Imperial County Department of Public Works comment letter dated May 7, 2026²⁶ requirements would reduce potential impacts 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 ICDPW and Imperial Irrigation District standards and requirements would reduce potential impacts to less than significant.

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

(iv) The proposed Wireless Communication Facility is not expected to impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map²², the proposed project site is located within "Zone X" of flood map 06025C0425C. Additionally, a reviewed and approved grading/drainage letter is to be required by the Imperial County Department of Public Works according to the comment letter dated May 7, 2026²⁶. 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 Communication Facility is not located within a flood hazard, tsunami, or seiche zone; therefore, impacts related to the release of pollutants due to project inundation would be less than significant. Additionally, as previously stated on item (X)(c)(iv) above, the proposed project site is located within "Zone X" of flood map 06025C0425C.

- 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)(a), (c) above, no water service would be required for operational purposes, and minimal water would be needed for construction. Future development would require a grading and drainage plan or letter approved by the ICDPW 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 consists of the construction and installation of wireless communications facility (WCF). The nearest residentially zoned property is located approximately 20,854 feet from the proposed facility, given this substantial separation distance, the project would not physically divide an established community. Furthermore, the project would not alter the

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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existing land use designation or zoning of the site. The proposed telecommunications tower is located within the A-2 (General Agriculture) zone, where Communication Towers are permitted subject to approval of a Conditional Use Permit pursuant to Title 9, Division 5, Chapter 8, Section 90508.02(r). Therefore, the proposed project is consistent with the applicable land use and zoning regulations. Therefore, less than significant impacts are anticipated.

- 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) As stated above in XI a), the proposed project is consistent with the Imperial County General Plan and with the County's Land Use Ordinance (Title 9), Division 5, Section 90508.02 (r), which states that Communication Towers are permitted in the A-2 (General Agriculture) zone only with an approved Conditional Use Permit. Additionally, the proposed project is consistent with the 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 communications 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 of a 120 ft tall Wireless Communication Facility (WCF) and is not to be located within one hundred (100) feet of a residential zone or residence, the nearest residential zone is approximately 20,854 ft from the proposed facility, complying with Division 24 Communication Facilities, Section 92401.00 "Noise". A temporary generation of noise would be expected during construction, however it 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 Element²³ 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 communications tower construction; 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 Maps²⁰. The nearest airport in the vicinity is the Calipatria Airport formally known as "Cliff Hatfield Memorial Airport" located approximately 11.5 miles east from the proposed project site; therefore, exposure to periodic noise emissions during aircraft takeoff and landing operations are not expected.

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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Additionally, the project was presented to the Airport Land Use Commission (ALUC) for a voluntary advisory review on June 17, 2026. Following its evaluation, the Commission determined that the project is consistent with the 2026 ALUC Plan. Therefore, 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 roads or other infrastructure)? ☐ ☐ ☒ ☐
- a) The proposed construction of the 120 ft tall Wireless Communications Tower (WCT) facility would not induce substantial unplanned population growth in an area, either directly or indirectly. Additionally, the proposed WCT would not utilize the totality of the 124.44 AC, and it would be located in a 50-foot by 50-foot lease area northwest corner of the property. 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. No changes to the existing designated agricultural use on the parcel are 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 communications tower is not expected to result in substantial adverse physical impacts related to the provision or need for new or altered government facilities. Therefore, impacts would be less than significant.**
- 1) Fire Protection? ☐ ☐ ☒ ☐
- 1) The proposed project is not expected to result in substantial impacts on fire protection. The proposed wireless communications tower (WCT) would occupy a portion of the 124.44-acre parcel, consisting of a 50-foot by 50-foot lease area located in the northwestern corner of the property. 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 area²⁴. Any impacts are expected to be less than significant.**
- 3) Schools? ☐ ☐ ☒ ☐
- 3) The proposed wireless communications tower is not expected to have a substantial impact on schools. The closest school within the vicinity of the proposed project site is the Grace Smith Elementary School located approximately 4.54 miles south in the city of Niland. Therefore, less than significant 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 communications tower is not expected to have a substantial impact on other public facilities; therefore, any impacts are expected to be less than significant.**

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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XVI. RECREATION

- a) Would the project increase the use of the existing 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 of a Wireless Communications Tower (WCT). Subsequently, the proposed communications 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. Additionally, the nearest residential zone is approximately 20,854 ft from the proposed facility; therefore, 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 communications 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 of a Wireless Communications Facility (WCF) for the colocation of a Verizon's equipment. After construction, the proposed wireless communications facility will be unmanned and will only require service technicians to visit the site periodically. The proposed communications 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 communications tower is approximately 1.26 miles away from the intersection between Winslow Road and State Route 111 (SR-111), and 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 involves the construction of a Wireless Communications Tower (WCT) to accommodate the colocation of Verizon's equipment on a 124-acre vacant agricultural parcel; the facility would only occupy a 50-foot by 50-foot lease area located in the northwestern portion of the property. The project is consistent with the Imperial County General Plan land use designation and applicable zoning regulations. Furthermore, the site design and operation are not expected to create or increase existing hazards. Therefore, impacts are anticipated to be less than significant.
- d) Result in inadequate emergency access? ☐ ☐ ☒ ☐
- d) The proposed project would not result in inadequate emergency access. Additionally, no changes to the existing land use, zoning, or permitted height limits under Division 24 are proposed. Access to the project site from Winslow Road is adequate for emergency response vehicles. Therefore, impacts would be less than significant.

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: ☐ ☐ ☒ ☐

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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- a) According to the Imperial County General Plan's Conservation and Open Space Element⁷, Figure 6, the project site is not located within a "Known Area of Native American Cultural Sensitivity". However, The Quechan Indian Tribe, Campo Band of Mission Indian Tribe and Agua Caliente 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 23, 2026. The County received on April 24, 2026, an email response from the Quechan Indian Tribe advising they had no comments for this project. Additionally, on April 24, 2026, the Agua Caliente Band of Cahuilla Indians Tribe submitted a request for government-to-government consultation regarding the proposed project. In response, Imperial County Planning & Development Services (ICPDS) coordinated and conducted a consultation meeting via Zoom on May 20, 2026, to discuss the project and provide clarification on its scope and details. During the consultation, the applicant committed to providing the Tribe with the relevant environmental and cultural resource documentation once those studies are completed. Furthermore, the applicant agreed to maintain ongoing communication with the Tribe and provide updates regarding project developments, findings, and any additional information as it becomes available throughout the review process. Adherence to all required measures and ongoing communication with the Agua Caliente Tribe is expected to reduce any potential impacts to a less than significant level.

- (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 Resources²⁵ in Imperial County, the proposed project site is not listed or seems to be eligible under the Public Resources Code Section 21074 or 5020.1 (k); Additionally, as stated above in Section XVIII(a), the applicant shall provide the Agua Caliente Tribe with any updates regarding cultural resources. Therefore, with continued coordination and compliance with these requirements, any potential 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 in 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 Element⁷ 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, the applicant should provide the Agua Caliente Tribe with any updates regarding cultural resources. 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 wireless communications Facility (WCF) 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 7, 2026, ICPDS received a comment letter from the Imperial Irrigation District¹³ stating that 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? ☐ ☐ ☒ ☐

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) The proposed project is for the construction and installation of a Wireless Communications Facility (WCF) to collocate Verizon's equipment within a 50-foot by 50-foot leased and fenced area at the northwest portion of the 124.44 AC parcel and 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.				
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 communications 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 proposed project is for a Wireless Communication Facility (WCF), for any future development, 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 , | | | | |

Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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“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. Additionally, project design and subsequent construction will be subjected to compliance with the latest edition of the California Building Code as well as going through a ministerial building permit review. Adherence and compliance with the California Building Code standards and regulations would bring any impact 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

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
- Rocio Yee, Project Planner
- Isara Galvez, 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
- Agua Caliente Band of Cahuilla Indians 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=465dfd3d807c46cc8e8057116f1aaca>
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 7, 2026
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, Siting, 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 7, 2026
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-4159cdf6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map>

2022/fire-hazard-severity-zone-maps---

ira/imperial_ira_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>
26. Imperial County Public Works comment letter dated May 7, 2026
27. California Health and Safety Code
https://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=7.&title=&part=1.&chapter=2.&article
28. Renewable Energy Overlay and Plant Locations
<https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=0d869c18d11645cc918391fdcac24b80>
29. Imperial County Agricultural Commissioner Office Comment letter dated May 29, 2026

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) #26-0006 / Initial Study #26-0007

Project Applicant: The Towers, LLC

Project Location: 307 E Winslow Rd., Niland, CA 92257

Description of Project:

The applicant, The Towers, LLC, is proposing to build a Wireless Communications Facility (WCF) at 307 E Winslow Rd., Niland, CA 92257, which consists of a 120-foot-tall monopole tower and related equipment within a 2,500 sq.ft. leased, fenced area at the northwest portion of the above-mentioned parcel. The proposed WCF would be developed, constructed, owned, and operated by The Towers, LLC. The proposed tower is located within the A-2-RE Zone, in which Communication Towers are allowed upon approval of a Conditional Use Permit (CUP #26-0006) under Title 9, Division 5, Chapter 8, Section 90508.02 (r).

According to the applicant, the proposed WCF is designed to house the equipment necessary to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Imperial County, more specifically within Calipatria along Highway 111. The tower would contain Verizon equipment with two (2) MX08FIT665-02E antennas, two (2) AIR3283 antennas, two (2) AIR6419 antennas, two (2) 4490 RRU's, one (1) 6' microwave, two (2) OVP boxes, one (1) GPS antenna, required antenna cabling, and HCS jumpers. The 2,500 sq. ft. lease area will be surrounded by a 6-foot-high chain link fence. Space for the future co-location of two additional wireless carriers has been made available on the proposed tower as encouraged under Title 9, Division 24.

The ground equipment will also be contained within the fenced area, including (2) Ground Mounted Radio Cabinets, (1) Equipment Canopy, (1) Fiber Box, (1) 200A ILC Cabinet, (1) Manual Service Light Switch Timer, (3) Service Lights, (1) Back-Up Diesel Generator, (2) Raised Concrete Pads, Cable Ice Bridge, Utility Backboard And Multi-Meter Utility Service mounted on concrete pad. Access to the lease area is being proposed to be a 180-ft-long and 12-ft-wide gravel road.

A proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area. Water and sewer services are not required for the proposed facility.

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.

6-30-2026

Date of Determination

See Mike Elph

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

Tim Tuck

6/26/26

Date

Vice President - Lease Administration

SECTION 4

VIII. RESPONSE TO COMMENTS

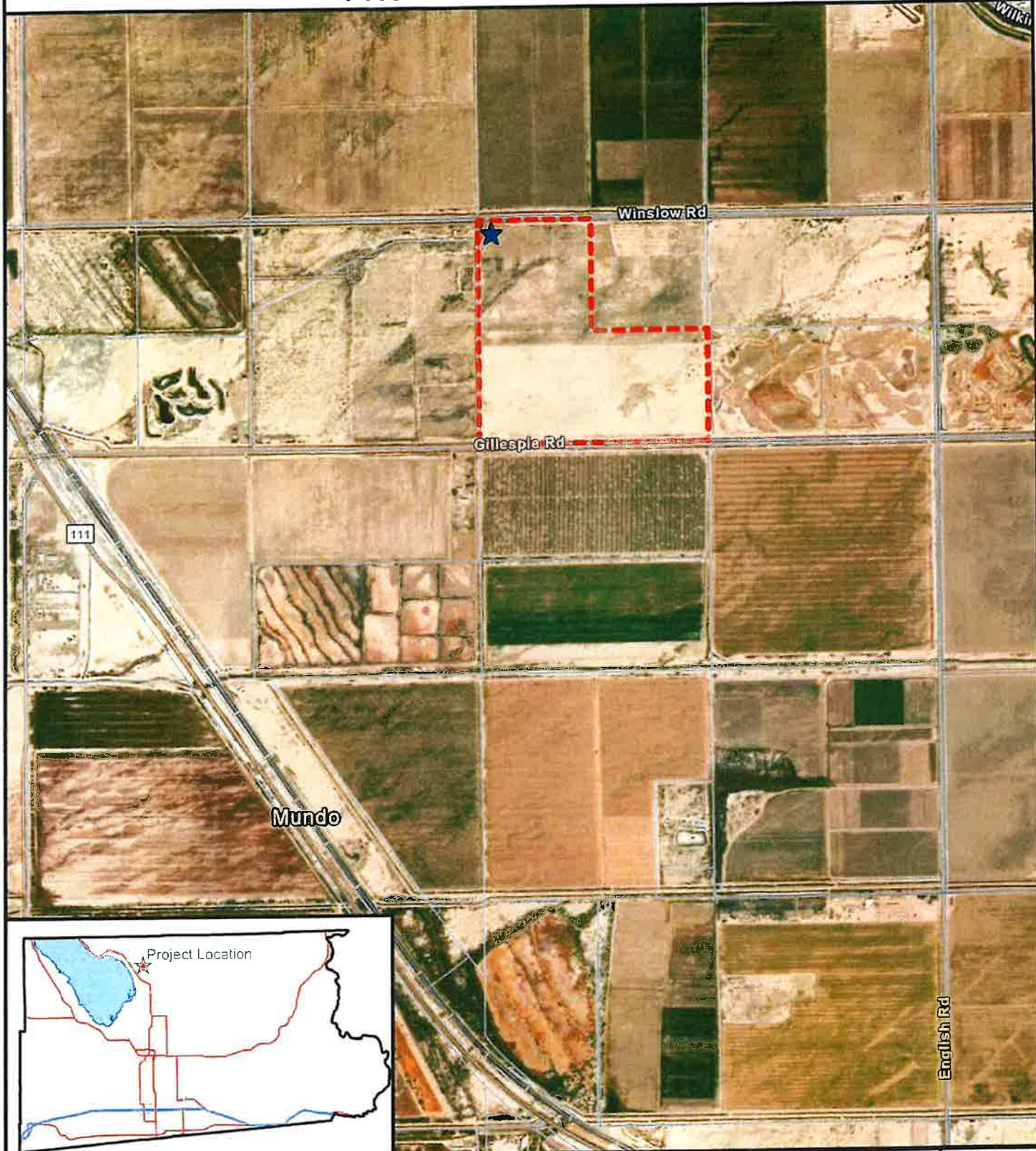
(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

VICINITY MAP

PROJECT LOCATION MAP



THE TOWERS, LLC
307 E WINSLOW RD
CUP #26-0006
APN: 003-200-035-000

- Project Location
- Parcels
- Centerline
- Proposed Tower Location



EEC ORIGINAL PKG

COMMENT LETTERS



www.iid.com

Since 1911

Thursday, May 7, 2026

Isara Galvez
Planner I
Planning and Development Services
801 Main St.
El Centro, CA 92243

RECEIVED

MAY 13 2026

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

SUBJECT: The Towers, LLC (003-200-035-000)

Dear Isara Galvez:

On Thursday, April 23, 2026, the Imperial Irrigation District received a request from the Imperial County Planning and Development Services Department for The Towers, LLC, located at 307 E. Winslow Rd., Niland, CA 92257. The project proposes a new unmanned wireless telecommunications facility. It is intended to address a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers within Calipatria along Highway 111. The project consists of a 120-foot-tall monopole tower to accommodate the colocation of Verizon's equipment. The proposed project would be located at 307 E. Winslow Rd., Niland, CA 92257 (APN 003-200-035-000), within a 2,500 sq. ft. fenced area in an A-2-RE Zone (General Agriculture with Renewable Energy Overlay).

IID has reviewed the project information and has the following comments:

1. The project proponent will be required to provide and bear all costs associated with the 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's cost.
2. Public utility easements shall be dedicated over all private and public roads, and an additional ten (10) feet in width on both sides of the private and public roads shall be dedicated to IID for the construction, operation, and maintenance of its electrical infrastructure. IID reserves the right to require expansion of these easements based on the type of electric infrastructure to be installed.
3. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which may include but is not limited to the dedication of real property for the purpose of siting an electrical utility substations to support the project, the cost of

IMPERIAL IRRIGATION DISTRICT
GENERAL COUNSEL'S OFFICE • 333 E. BARIONI BLVD. • P.O. BOX 937 • IMPERIAL, CA 92251
TELEPHONE (760) 339-9564 • FAX (760) 339-9062

EEC ORIGINAL PKG

acquisition and dedication of rights of way and/or easements for the construction of electrical transmission and/or distribution lines and ancillary facilities associated with the conveyance of energy service) are to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation.

4. The applicant will be required to provide rights of way 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.
5. Substations and switchyards shall be located on property that will be transferred to IID in fee simple ownership with legal access.
6. Approved design plans (Conduit Plan) are to be included with a Tract Map review.
7. Mylar maps to be submitted for processing only upon IID review and design (conduit) plan approval.
8. If and when the customer is contemplating electrical service, please contact the area service planner Mr. Oscar Ruelas at 760-482-3423 or email at ORuelas@IID.com. Customer is required to apply with IID for electrical service to the project. 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 the site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to the project.
9. 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.
10. Applicant shall provide a surveyed legal description and associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary 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. Below is a screen shot of the subject property.
11. **Water Department Comments** The proposed new unmanned wireless telecommunications facility is located on APN 003-200-035-000, northwest of the City

of Niland, at 307 E. Winslow Road. The proposed facility is designed to address the significant gap in Verizon's 5G and 4G LTE coverage along Highway 111.

12. Imperial Irrigation District (IID) Water Department facilities impacted include the Niland Lateral 2, Niland Delivery 208, and Niland 1 Drain. The proponents may not use IID's canal or drain banks to access the project site. Any abandonment of easements or facilities will be approved by the IID based on systems (irrigation, drainage, Power, etc.) needs.
13. To insure there are no impacts to IID Water Department facilities the project's plans are to be submitted to IID Water Department Engineering Services Section prior to final project design. IID Water Department Engineering Services Section should be contacted at (760) 339-9265 for information.
14. Proponents should include and label, on their site plans, Niland Lateral 2, Niland Delivery 208 structure, and Niland 1 Drain.
15. A pipe crossing is required to access Winslow Road from the parcel site. IID will install the pipe crossing over the Niland Lateral 2. An encroachment permit will also be required for the new crossing.
16. Any construction or operation on IID property or within its existing and proposed right of way or easements will require an encroachment permit or agreement that encompasses all IID permits, including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; all water, sewer, storm water; and any other above ground or underground utilities. A copy of the encroachment permit application is included in IID's Developer Project Guide available at <http://www.iid.com/home/showdocument?id=2328>. For additional information regarding encroachment permits, the IID Real Estate Section should be contacted at (760) 339-9239.
17. In addition to IID's recorded easements, IID claims, at a minimum, a prescriptive right of way to the toe of slope on all existing and canals and drains. Where space is limited and depending on the specifics of adjacent modifications, the IID may claim additional secondary easements/prescriptive rights of ways to ensure operation and maintenance of IID's facilities and to reduce or mitigate proposed project impacts. IID should be consulted prior to the installation of any facilities adjacent to IID's facilities.
18. Any new, relocated, upgraded 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 CEQA and/or 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 the environmental documentation

is amended and environmental impacts are fully mitigated. 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.

Should you have any questions, please do not hesitate to contact IID at iidenviornmental@iid.com. Thank you for the opportunity to comment on this matter.

Respectfully,



Wayne K. Strumpfer
General Counsel

Cc: Matthew H Smelser – Manager, Power Dept.
Mike Pacheco – Manager, Water Dept.
Tina Shields – Manager, Water Dept
Paul Rodriguez – Deputy Mgr. Power Dept. Power Dept.
Guillermo Barraza – Mgr. of Distribution Svcs. & Maint. Oprtns., Power Dept.
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Supervisor, Environmental Compliance Water



COUNTY OF
IMPERIAL

DEPARTMENT OF
PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

Tel: (442) 265-1818
Fax: (442) 265-1858

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[https://twitter.com/
CountyDpw/](https://twitter.com/CountyDpw/)

Public Works works for the Public



May 7, 2026

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

RECEIVED

By Imperial County Planning & Development Services at 10:18 am, May 07, 2026

Attention: Isara Galvez Planner II

SUBJECT: CUP 26-0006 The Towers, LLC.
Located at 307 E Winslow Rd., Niland, CA 92257.
APN 003-200-035.

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on April 23rd, 2026, for the above-mentioned project. The applicant proposes a new unmanned wireless telecommunications facility. The project consists of a 120-foot-tall monopole tower to accommodate the colocation of Verizon's equipment.

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

1. At time of development, if required, be section 8762(b) of the Professional Land Surveyors' Act, a record of survey shall be filed with the County Recorder of Imperial County.
2. The applicant shall provide an Irrevocable Offer of Dedication (IOD) or dedicate the required portion for sufficient right of way for future development of **Gillespie Road**, being classified as **Minor Collector – Local Collector - two (2) lanes**, requiring **seventy (70)** feet of right of way, being **thirty-five (35)** feet from the existing centerline. It is required that sufficient right of way be provided to meet this road classification. **(As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**
3. The applicant shall provide an Irrevocable Offer of Dedication (IOD) or dedicate the required portion for sufficient right of way for future development of **Winslow Road**, being classified as **Local Roads / Residential - two (2) lanes**, requiring **sixty (60)** feet of right of way, being **thirty (30)** feet from the existing centerline. It is required that sufficient right of way be provided to meet this road classification. **(As directed by Imperial County Board of Supervisors per Minute Order #6 dated 11/22/1994 per the Imperial County Circulation Element Plan of the General Plan).**
4. A grading plan or a drainage and grading letter prepared by a California Licensed Civil Engineer is required to be submitted to provide for property grading and drainage control and prevent damage to adjacent properties.

5. Prior the issuance of the final certificate of occupancy a Drainage/Grading certification letter along with pictures shall be provided by a Civil Engineer or Surveyor that recommend grading and drainage controls were completed per the accepted drainage and grading letter.
6. Encroachment Permit Application shall be submitted for the required driveway (per Chapter 12.12 – Excavations on or near a Public Road of the Imperial County Ordinance). Application Attached.
7. IID Encroachment permit may be required for Class II base driveway over Niland Lateral 2.

INFORMATIVE:

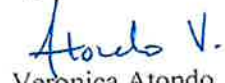
- A Transportation Permit may be required from road agency(s) for any hauls of heavy equipment and/or large vehicles which impose greater than legal loads.

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,

David B. Dale, PE
Director of Public Works

By:



Veronica Atondo, PE, PLS
Deputy Director of Public Works - Engineering

AIR POLLUTION CONTROL DISTRICT



May 7, 2026

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

RECEIVED

By Imperial County Planning & Development Services at 4:44 pm, May 07, 2026

SUBJECT: Conditional Use Permit 26-0006 – The Towers, LLC

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review and comment on the application for Conditional Use Permit (CUP) 26-0006 (Initial Study 26-0007) that would allow the construction and operation of a new unmanned wireless telecommunications at 307 E. Winslow Road in Niland, also identified as Assessor's Parcel Number 003-200-035.

The proposed facility (project) will hold a 120-foot monopole with multiple various equipment cabinets and one (1) backup diesel generator located on a 50 x 50-foot area enclosed by a 6-foot chain-link fence with gate. The site will be accessed by a 12-foot wide and 180-foot long road gravel road from Winslow Road.

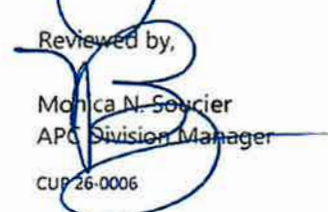
The project is required to adhere to Regulation VIII at all times. Regulation VIII is a collection of rules designed to limit emissions of fugitive dust (PM₁₀) to no more than 20 percent. Specific attention should be paid to Rule 801—Construction and Earthmoving. From the project description in Attachment 2, page 5, point 12, the Air District understands that an access road will be constructed. The project proponent will need to adhere to Rule 805—Paved and Unpaved Roads. A **Construction Notice** must be submitted to the Air District at least 10 days prior to the start of earthmoving. Finally, the site plans identify a backup generator on site. The project proponent must contact the Permitting & Engineering Division of the Air District to obtain a permit.

Air District rules and regulations and forms, along with our California Environmental Quality Act Handbook, can be found on our website at <https://apcd.imperialcounty.org> by accessing the Planning drop-down menu. The Air District can be contacted at (442) 265-1800.

Sincerely,


Curtis Blondell
APC Environmental Coordinator II

Reviewed by,


Monica N. Sourier
APC Division Manager

CUP 26-0006

Page 1 of 1



TRIBAL HISTORIC PRESERVATION OFFICE
5401 Dinah Shore Drive
PALM SPRINGS, CA 92264
(760) 699-6800
FAX (760) 699-6924

01-009-2026-007

April 24, 2026

[VIA EMAIL TO: isaragalvez@co.imperial.ca.us]
Imperial County
Isara Galvez
801 Main Street
El Centro, CA 92243

RECEIVED

By Imperial County Planning & Development Services at 4:04 pm, Apr 24, 2026

Re: CUP26-0006/IS26-0007

Dear Isara Galvez,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the CUP26-0006/IS26-0007 project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. A records check of the ACBCI registry indicates this area has not been surveyed for cultural resources. In consultation, the ACBCI THPO requests the following:

- *Formal government to government consultation under California Assembly Bill No. 52 (AB-52).
- *A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.
- *A copy of the records search with associated survey reports and site records from the information center.
- *Copies of any cultural resource documentation (report and site records) generated in connection with this project.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 413-5836. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Anthony Kline

Anthony Kline
Cultural Resources Analyst
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

EEC ORIGINAL PKG



Jim Minnick
DIRECTOR

Imperial County Planning & Development Services Planning / Building

RECEIVED

By Imperial County Planning & Development Services at 4:23 pm, May 29, 2026

**April 23, 2026
REQUEST FOR REVIEW
AND COMMENTS**

The attached project and materials are being sent to you for your review and as an early notification that the following project is being requested and being processed by the County's Planning & Development Services Department. Please review the proposed project based on your agency/department area of interest, expertise, and/or jurisdiction.

To: County Agencies	State Agencies/Other	Cities/Other
☒ County Executive Office – Rosa Lopez	☒ IC Sheriff's Office – Robert Benavidez/Fred Miramontes/Ryan Kelley	☒ IID – Patricia Rodriguez/ Lauren Olivo/ Jeremy Brooks
☒ Public Works – Carlos Yee/ David Dale	☒ Board of Supervisors – Ryan Kelley - District #4	☒ IC Fire/OES Office – Andrew Loper
☒ Fort Yuma- Quechan Indian Tribe – Jonathan E. Koteen / H. Jill McCormick	☒ Ag. Commissioner – /Margo Sanchez/Jolene Jauregui	☒ EHS – Jeff Lamoure/Marco Topete/ Alphonso Andrade/Jorge Perez/Sheila Vasquez/ Robert Menvielle
☒ Imperial County Applicators – Bryon Nelson	☒ Campo Band Of Mission Indians - Marcus Cuero/ Daniel Tsosie	☒ APCD – Monica Soucier/Belen Leon/Jesus Ramirez

From: Isara Galvez Planner I - (442) 265-1736 or isaraagalvez@co.imperial.ca.us

Project ID: Conditional Use Permit #26-0006 & Initial Study #26-0007

Project Location: 307 E Winslow Rd., Niland, CA 92257 APN 003-200-035-000

Project Description: The project proposes a new unmanned wireless telecommunications facility. It is intended to address a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers within Calipatria along Highway 111. The project consists of a 120-foot-tall monopole tower to accommodate the colocation of Verizon's equipment. The proposed project would be located at 307 E. Winslow Rd., Niland, CA 92257 (APN 003-200-035-000), within a 2,500 sq.ft. fenced area in an A-2-RE Zone (General Agriculture with Renewable Energy Overlay).

Applicants: The Towers, LLC

Comments due by: **May 7th 2026 at 5:00PM**

COMMENTS: (attach a separate sheet if necessary) (if no comments, please state below and mail, fax, or e-mail this sheet to Case Planner)

No Comments

Name: *Margo Sanchez* Signature: *Margo Sanchez* Title: *Deputy Ag Commissioner*
Date: *5/29/2026* Telephone No.: *442-265-1800* E-mail: *margosanchez@co.imperial.ca.us*

IGIATIS:\AllUsers\APN\003\200\035\CUP26-0006 IS26-0007\CUP26-0006 Request for Comments 4.23.26 .docx

RE: US-CA-5878 | Conditional Use Permit Application



Margo Sanchez

To: Samantha Herrmann; **Planning** - ICPD5CommentLetters

Cc: Jolene Dessert; Rocio Yee



260529-CUP26-0006-NoComment.pdf

108 KB



3:33 PM

RECEIVED

By Imperial County Planning & Development Services at 4:23 pm, May 29, 2026

Hello Samantha,

Regarding your questions concerning our Comment Letter dated May 6, 2026, our primary concern was that the project did not have an Airport Land Use Commission approval that may or may not have a requirement regarding tower lighting for local agriculture aerial applicators, who often use make shift runways in various areas of the county, and might not see an unlit tower.

However, after reviewing the new ALUC documents and areas of authority, I did not find any requirements outside of the designated airport land vicinity maps, therefore since you do have FAA pass results for clearance of the project, and Imperial County does not require lighting for this size tower, I am withdrawing our comment letter for this project and replacing it with a "No Comment" status, please see the attachment.

Thank you for your inquiry and please let me know if you have any further questions.

Best regards,
Margo

Margo Sanchez

Deputy Agricultural Commissioner

Deputy Sealer of Weights & Measures

Special Projects / Weights & Measures Division

Imperial County Agricultural Commissioner's Office

442.265.1500

7-4:30pm / Off rotating Fridays

agcom.imperialcounty.org



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Office of the Agricultural Commissioner
Sealer of Weights and Measures
852 Broadway, El Centro CA 92243

Jolene Dessert
Commissioner / Sealer

Rachel Garewal
Asst. Commissioner / Sealer

May 6, 2026

Isara Galvez, Planner
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243

RECEIVED

By Imperial County Planning & Development Services at 4:08 pm, May 06, 2026

Re: CUP26-0006 / IS26-0007 The Towers, LLC; APN 003-200-035

Dear Ms. Isara,

Our office has reviewed the documents pertaining to CUP26-0006 and has concerns regarding the following:

1. Page 4 of 8, Attachment 1-Project Narrative, US-CA-5878 Mundo, section 3, item 3.3. Additional Details, 3.3.1. Lighting. states that the tower will not be artificially illuminated, and no artificial lighting is required pursuant to state and federal authorities. However, our office is concerned about visibility of the tower to aerial pesticide applicators making applications in this agricultural area. Aerial agricultural pesticide applications are often made during night and early morning hours, and this tower not being lit could lead to not being seen by aviators nearby and potential collisions.
2. Page 5 of 18, Attachment 2-Code Compliance, US-CA-5878 Mundo, section 9. Painting and Lighting. The applicants response addresses painting, however no response was given regarding lighting of the project.
3. No Airport Land Use Commission approval was included to document approval of the project.

We would appreciate receiving any additional information you may have regarding these concerns.

Please contact me at 442-265-1500.

Best regards,

Margo Sanchez
Deputy Agricultural Commissioner/Sealer

RECEIVED

Olivia Lopez

APR 24 2026

From: Jill McCormick <historicpreservation@quechantribe.com>
Sent: Friday, April 24, 2026 5:57 AM
To: Olivia Lopez; Isara Galvez
Subject: Re: [EXTERNAL]:AB 52 Letter - The Towers LLC (CUP26-0006/IS26-0007)

IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

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

Good morning,

This email is to inform you that the Historic Preservation Office of the Ft. Yuma Quechan Tribe does not wish to provide comments 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: Olivia Lopez <olivialopez@co.imperial.ca.us>
Sent: Thursday, April 23, 2026 2:39 PM
To: Tribal Secretary <tribalsecretary@quechantribe.com>; Jill McCormick <historicpreservation@quechantribe.com>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Isara Galvez <isaragalvez@co.imperial.ca.us>; Rocio Yee <rocioyee@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Azucena Gallardo <azucenagallardo@co.imperial.ca.us>; Diana K Ramos <dianakramos@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Nicole Atondo <nicoleatondo@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>; Vanessa DeLaTeja <vanessadelateja@co.imperial.ca.us>
Subject: [EXTERNAL]:AB 52 Letter - The Towers LLC (CUP26-0006/IS26-0007)

APPLICATION

EEC ORIGINAL PKG

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 Patiola Investments LLC	EMAIL ADDRESS	
2. MAILING ADDRESS (Street / P O Box, City, State) 112 Pixel, Irvine, CA	ZIP CODE 92618	PHONE NUMBER
3. APPLICANT'S NAME The Towers, LLC	EMAIL ADDRESS PMoffett@assurance-group.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 22 W. Atlantic Ave, Delray Beach, FL	ZIP CODE 33444	PHONE NUMBER 323 979 7914
4. ENGINEER'S NAME	CA. LICENSE NO.	EMAIL ADDRESS
5. MAILING ADDRESS (Street / P O Box, City, State)	ZIP CODE	PHONE NUMBER
6. ASSESSOR'S PARCEL NO. 003-200-035-000	SIZE OF PROPERTY (in acres or square foot)	ZONING (existing) A-2-RE
7. PROPERTY (site) ADDRESS Calipatria, CA 92257		
8. GENERAL LOCATION (i.e. city, town, cross street) Calipatria		
9. LEGAL DESCRIPTION Section 19, Townsite 10, South Range 14, East S.B.M		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	New 120' monopole wireless facility
11. DESCRIBE CURRENT USE OF PROPERTY	undeveloped agricultural land
12. DESCRIBE PROPOSED SEWER SYSTEM	no sewer on site
13. DESCRIBE PROPOSED WATER SYSTEM	no water on site
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	
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.

Please see attached LOA

Phoebe Moffett
Print Name
Signature
Date
3/25/26

REQUIRED SUPPORT DOCUMENTS

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

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

DATE _____
DATE _____
DATE _____
DATE _____
DATE _____

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

CUP #

26-0006

IS26-0007

EEC ORIGINAL PKG



The Towers, LLC: US-CA-5878 Mundo

WCF Conditional Use Permit Application

**APN:
003-200-035-000
Calipatria, CA 92257
Imperial County**

www.Assurance-Development.com | 626-765-5079

EEC ORIGINAL PKG



Attachment 1

Project Narrative

**PROJECT NARRATIVE
WCF CONDITIONAL USE APPLICATION
US-CA-5878 MUNDO**

Submitted to County of Imperial, California
Planning Division

Applicant: The Towers, LLC, known in California as the Towers of California, LLC
22 W. Atlantic Ave Suite 310
Delray Beach, FL 33444

Co-Applicant: Los Angeles SMSA Limited Partnership , a California Limited
Partnership ("Verizon")
1200 Concord Ave., Suite 500
Concord, CA 94520

Representative: Assurance Development
1499 Huntington Dr. #305
South Pasadena, CA 91030
Contact: Phoebe Moffett
323-979-7914
pmoffett@assurance-group.com

Property-Owner: Patlola Investments LLC
112 Pixel
Irvine, CA 92618

Project Address: Calipatria, CA 92257

Description & Tax Lot: GPS Coordinates: 33.292283° / -115.561911°
Parcel No. 003-200-035-000

Zoning Classification: A-2-RE

Assurance Development submits this application on behalf of The Towers of California, LLC ("The Towers, LLC") and Los Angeles SMSA Limited Partnership , a California Limited Partnership ("Verizon"), collectively referred to as the "Applicants," and the underlying property owner.

The Towers, LLC specializes 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 Verizon, lease space on this infrastructure to house their equipment and offer wireless services to end users. Through strategic partnerships with wireless carriers, The Towers, LLC allows the opportunity for multiple carriers to collocate onto a single tower and reduces the physical footprint of wireless facilities in the community.

1. REQUEST

Applicants seek a review and approval of a Conditional Use Permit application for their proposed Wireless Communication Facility (“WCF”). Included with this application are the following documents for review (collectively, “Applicants’ Application”)

Attachment 1:	Project Narrative (this document)
Attachment 2:	Statement of Code Compliance
Attachment 3:	Application Package
Attachment 4:	Indemnification Form
Attachment 5:	Agent Letter of Authorization
Attachment 6:	Owner Letter of Authorization
Attachment 7:	Zoning Drawings
Attachment 8:	Verizon Coverage Maps
Attachment 9:	Alternative Sites Analysis
Attachment 10:	Photo Simulations
Attachment 11:	FAA Clearance Letter
Attachment 12:	Parcel Map
Attachment 13:	EME Report
Attachment 14:	Grant Deed
Attachment 15:	Title Report

2. PROJECT OVERVIEW

The Towers, LLC is proposing to build a new wireless telecommunications facility (“WCF” or “Facility”), US-CA-5878 Mundo, at the above noted project address for the colocation of Verizon’s equipment. This Facility is intended to fill a significant gap in Verizon’s 5G and 4G LTE coverage experienced by its customers in Imperial County, more specifically within Calipatria along Hwy 111.

As shown in Applicants’ Application, this proposed project meets all applicable Imperial County Municipal Code 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 mean of meeting Verizon’s coverage objectives for this site. Accordingly, the

Applicants respectfully requests Imperial County to approve this project as proposed, subject only to Imperial County's standard conditions of approval.

3. PROPOSED PROJECT DETAILS

3.1. Location

Detailed information regarding the subject property and proposed lease area is included in **Attachment 7, Zoning Drawings**, to the Applicants' application.

3.1.1. Subject property. The subject property of this proposal is located on APN 003-200-035-000 in the County of Imperial (the "Property"). The Property is owned by Patlola Investments LLC. The Property is zoned as A-2-RE and is currently used primarily as vacant undeveloped land.

3.1.2. Lease area.

- The proposed 50 x 50 ft lease area for the WCF is located on the southwest corner of the property (the "Lease Area").
- The lease area will be surrounded by a 6ft chain link fence with access to the lease area secured by a locked gate.

3.1.3. Access and parking. Site will be accessed by a 12' wide and 180' long gravelled access road stemming from Winslow Road.

3.2. Wireless Facilities and Equipment

Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 7, Zoning Drawings**, to Applicants' Application.

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

3.2.2. Antennas and accessory equipment.

- The Pole will contain Verizon equipment with (2) MX08FIT665-02E antennas, (2) AIR3283 antennas, (2) AIR6419 antennas, (2) 4490 RRU's, (1) 6' microwave, (2) OVP boxes, (1) GPS antenna, required antenna cabling, and HCS jumpers.
- The antennas, RRHs, and accessory equipment on the Pole will be painted to match. All paint will have an anti-glare finish.
- Sufficient space will be made available on the Pole as required for future collocations. The proposed Verizon antenna centerline is 117 ft and the proposed Verizon antenna tip height is 114 ft.

3.2.3. Ground equipment.

- The ground equipment will include (2) Ground Mounted Radio Cabinets, (1) Equipment Canopy, (1) Fiber Box, (1) 200A ILC Cabinet, (1) Manual Service Light Switch Timer, (3) Service Lights, (1) Back-Up Diesel Generator, (2) Raised Concrete Pads, Cable Ice Bridge, Utility Backboard And Multi-Meter Utility Service Mounted On Concrete Pad Within A 50'x50' Fenced Lease Area.

3.3. Additional Details

3.3.1. Lighting. The Tower will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. There will be three service lights on site that will only be utilized during site visits or in case of an emergency, as seen on Sheet A4 of **Attachment 7, Zoning Drawings**.

3.3.2. Utilities. No water or sewer service is required. A proposed IID transformer will be added adjacent to the lease area. The proposed utility route is shown on Sheet A2 of **Attachment 7, Zoning Drawings**.

4. VERIZON NETWORK COVERAGE AND SERVICES

4.1. Overview—Verizon 4G & 5G Coverage

Verizon 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.

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 Verizon 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 [CARRIER]’s 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the Facility will become part of Verizon’s statewide and nationwide communications network. See **Attachment 8, Verizon Coverage Maps**.

3.2 Coverage Objectives for Proposed Facility

This proposed Facility meets Verizon’s coverage objectives providing in-vehicle and in-building wireless coverage within a geographic area not adequately served by Verizon’s network. Specifically, this facility is intended to provide service to the area of Calipatria, specifically along Hwy 111. Verizon has established a need for service in this geographic area, as determined by market demand, coverage requirements for a specific geographic area, and the need to provide continuous coverage from one site to another in a particular geographic region. The specific coverage objective was determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area (See **Attachment 8, Verizon Coverage Maps**).

5. SEARCH RING

Verizon’s RF engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, Verizon’s RF engineers identified a “search ring” area where a WCF may be located to provide effective service in the target coverage area.

The search ring established for this proposal, and a description of the methodology used to identify the search ring, is provided in **Attachment 8, Verizon Coverage Maps**.

6. SITING ANALYSIS

Pursuant to the Imperial County Code Section 92406.01, Applicants evaluated alternative site locations, including collocation opportunities, within the targeted search ring possible locations for the proposed Facility. See **Attachment 9, Alternative Sites Analysis** for a summary of the alternative site locations analyzed.

7. APPLICABLE LAW

7.1. Local Codes

Pursuant to ICMC Section 90508.02, new WCF support Poles in the A-2-RE are subject to a Conditional Use Permit and hearing in front of Planning Commission and must comply with the criteria in Section 92401.04. See **Attachment 2, Statement of Code Compliance** for Applicants' demonstration of compliance with the applicable code.

7.2. State Law

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

7.3. 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.

7.3.1. 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

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").

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 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.

7.3.2. 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). The Applicants have included with this application a statement from Verizon’s radio frequency engineer demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission’s RF emissions regulations. See **Attachment 13, EME Report**. 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.

7.3.3. No discrimination amongst providers. Local jurisdiction also may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. §

² *Id.* at ¶ 35.

³ *Id.* at ¶¶ 34-42.

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.

7.3.4. 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 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).

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY
CONSISTING OF A 170' MONOPOLE WITH (2) MAXIFIT-065-026 ANTENNAS, (2)
AIRS243 ANTENNAS, (2) AIRB419 ANTENNAS, (2) 4450 HOPS, (1) 5'
MICROWAVE, (2) GSP-BOXES, (1) GPS ANTENNA, REQUIRED ANTENNA
CABLES, HCS JUMBERS, (1) FIBROCK INGRADED RUBBER CABLEFITS, (1)
EARTH ROD, (1) 1/2" DIA. 10' LONG, (1) 200A/400 GAUGE (1) 1/2" ANNUAL
SERVICE LIGHT SWITCH, 1/2" DIA. 1/2" DIA. 1/2" DIA. 1/2" DIA. 1/2" DIA. 1/2"
DIESEL GENERATOR WITH 147 GAL DIESEL FUEL TANK, (2) RAISED
CONCRETE PADS, UTILITY BACKBOARD AND MILE T-METER UTILITY SERVICE
MOUNTED ON H-FRAME WITHIN A 50'x5' FENCE) LEASE AREA, NO WATER
OR SEWER SERVICE IS REQUIRED. (THIS WILL BE AN UNMANNED FACILITY

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.

- 

MDG LOCATION ID: 5000924182

PROJECT INFORMATION	
SITE NAME:	MUNDO
SITE NUMBER:	US-CA-5678
FUZE PROJECT NUMBER:	1758184
SITE ADDRESS:	APN: 003-020-035-000 CALIPATRIA, CA 92527 003-020-035-000
PARCEL #:	N/A
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-2 RF: GENERAL AGRICULTURAL ZONE
ZONING JURISDICTION:	COUNTY OF IMPERIAL
CONSTRUCTION TYPE:	V-P
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE:	NON-HABITABLE
STRUCTURE HEIGHT:	120'
CONSTRUCTION AREA:	2,500 SQ FT
GROUND ELEVATION:	144.52 (NAVD83)
LATITUDE (NAD 83):	33.292263° (37° 17' 32.22" N)
LONGITUDE (NAD 83):	-115.561911° (115° 33' 42.88" W)

PROPERTY OWNER:	PATLOLA INVESTMENTS LLC 112 PkEtl IRVINE, CA 92618
APPLICANT:	THE TOWERS, LLC 22 W ATLANTIC AVE, #310 DELRAY BEACH, FL 33444
CONTACT:	ASSURANCE DEVELOPMENT 1493 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE 526 765 5079

UNDERGROUND SERVICE ALERT
 207-642-7111
 WWW.CANADIANMFG.COM
 207-642-7111 14 JAMES RD. UNIT 100, BANGOR, ME 04401
 FAX: 207-642-7111

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verizon
15505 SAND CANYON AVENUE
IRVINE, CA 92616

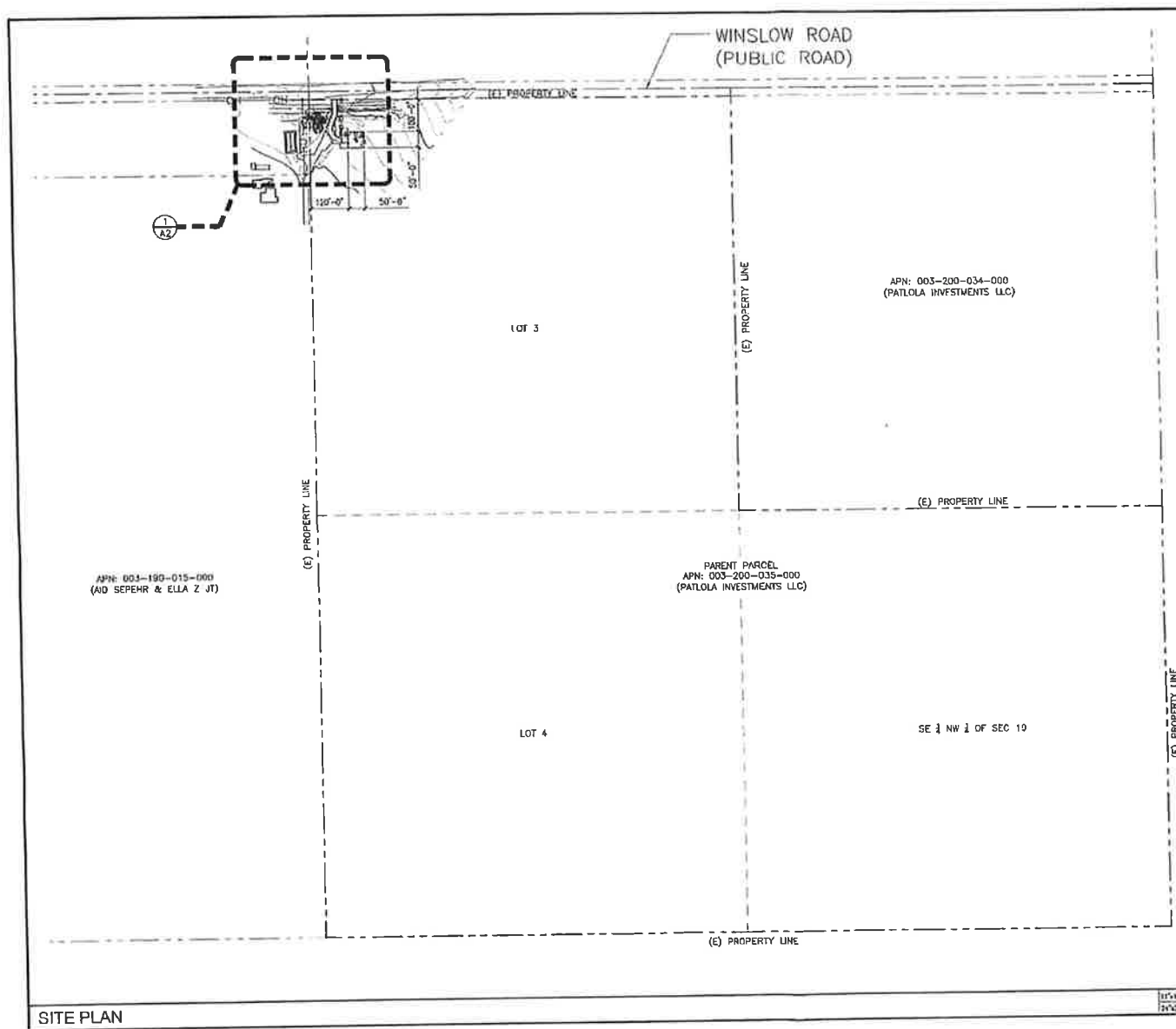
MUNDO
US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924782
APN: 003-200-035-000
CALIPATRIA, CA 92257

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TITLE SHEET

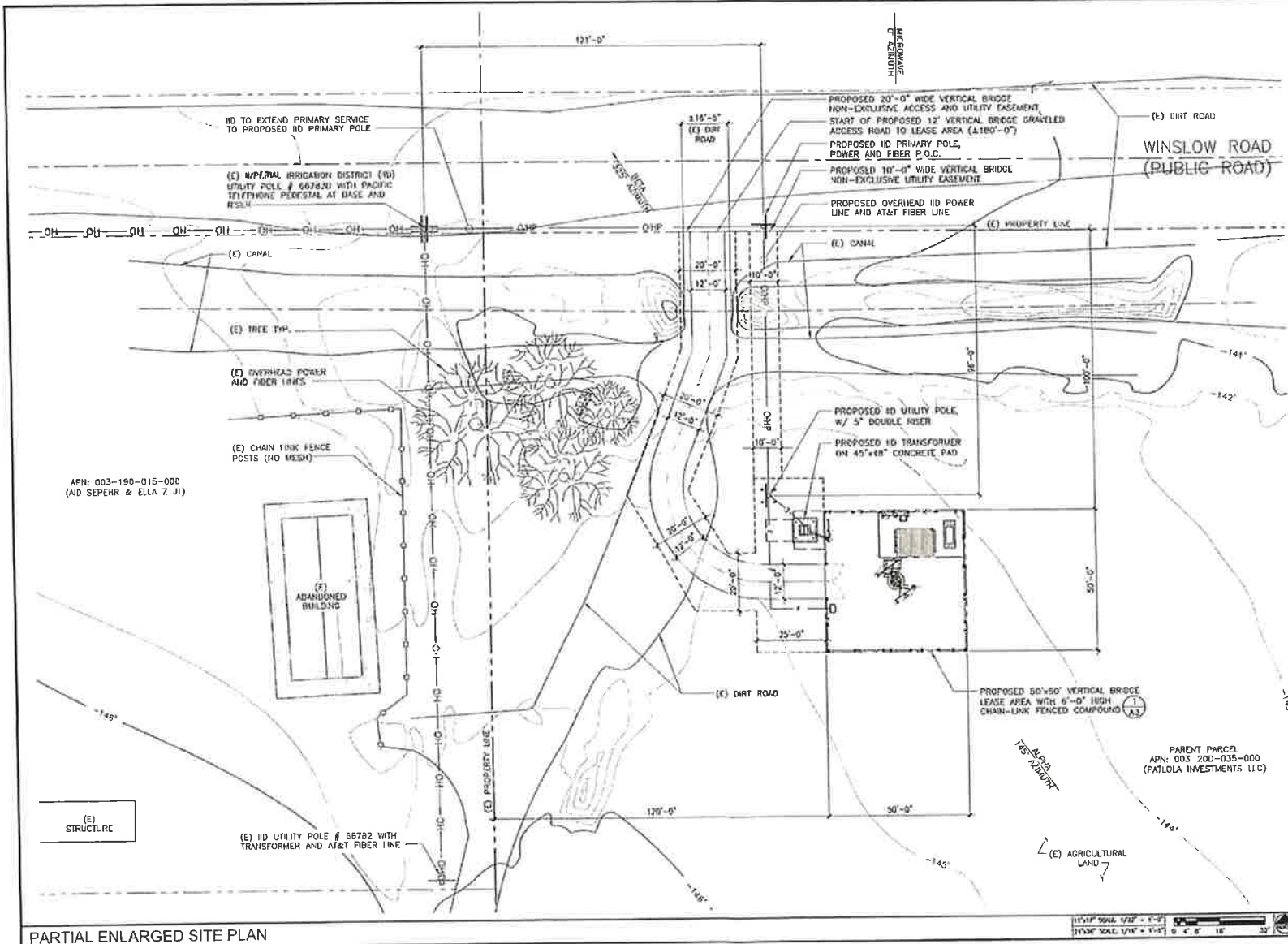
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AD
**ASSURANCE
DEVELOPMENT**
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5070

PROPRIETARY INFORMATION
THE INFORMATION CONTAINED IN THIS SET OF
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ALUMINUM WORKS CO.
ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 07-10-2010 BY 60322 UCBAW/STP/STP

verticalbridge.
THE TOWERS LLC
27 W ATLANTIC AVE, #310
OCEAN BEACH, FL 33444
561 406 4073

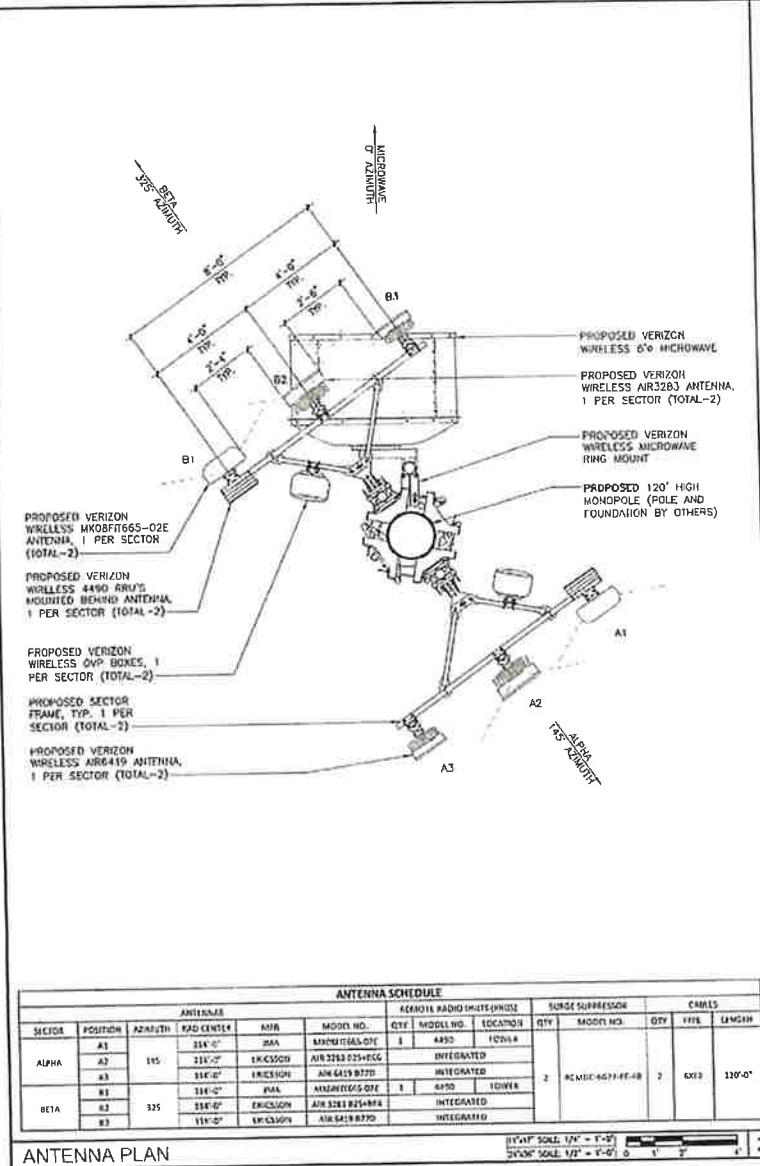
verizon
15505 SAND CANYON AVENUE
IRVINE, CA 92618

MUNDO
US-CA-5878
FUZE PROJECT ID: 17651344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

PARTIAL ENLARGED
SITE PLAN

A2

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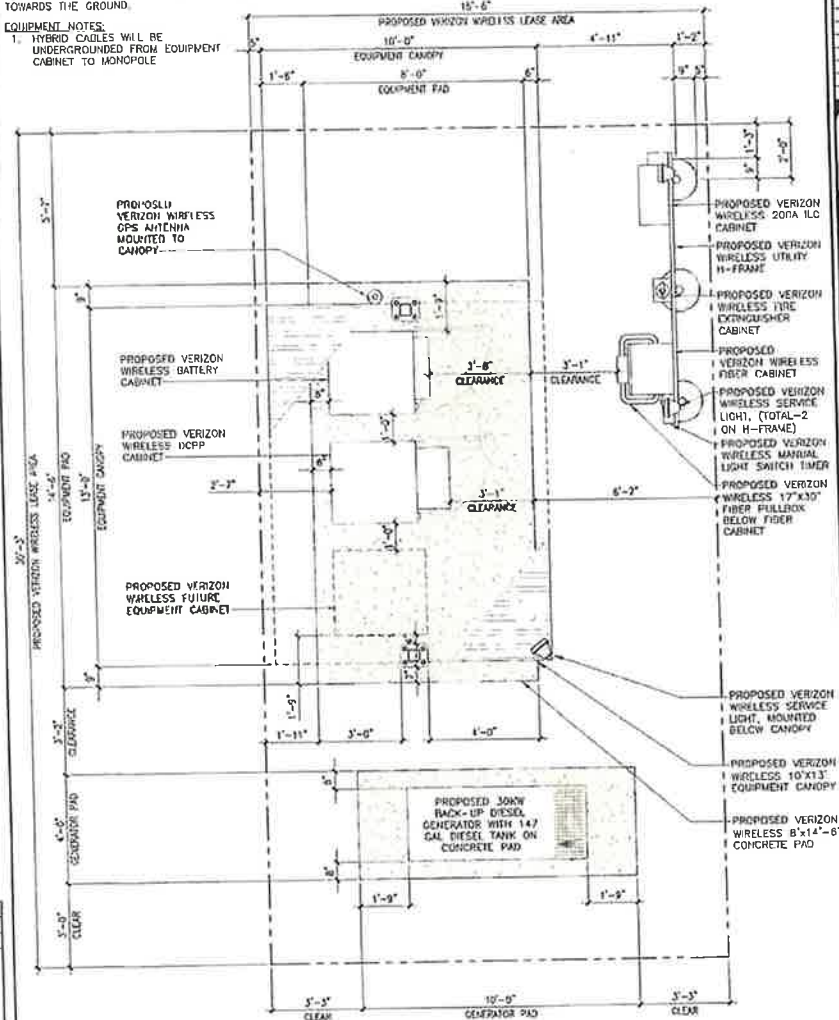


ANTENNA PLAN

SERVICE LIGHTING NOTES:

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

EQUIPMENT NOTES:
1. HYBRID CABLES WILL BE UNDERGROUNDED FROM CABINET TO MONOPOLE



2	EQUIPMENT PLAN
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[illegible]

AD
**ASSURANCE
DEVELOPMENT**
201 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5079

PROPRIETARY INFORMATION

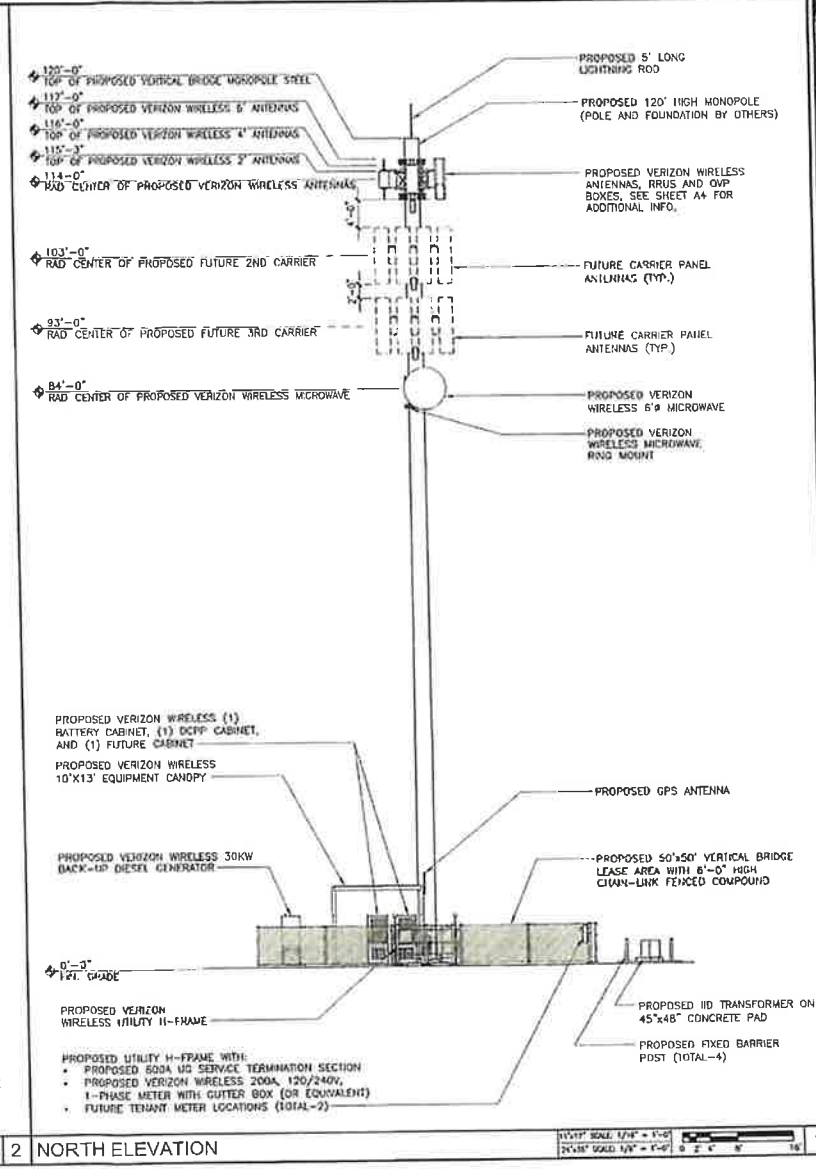
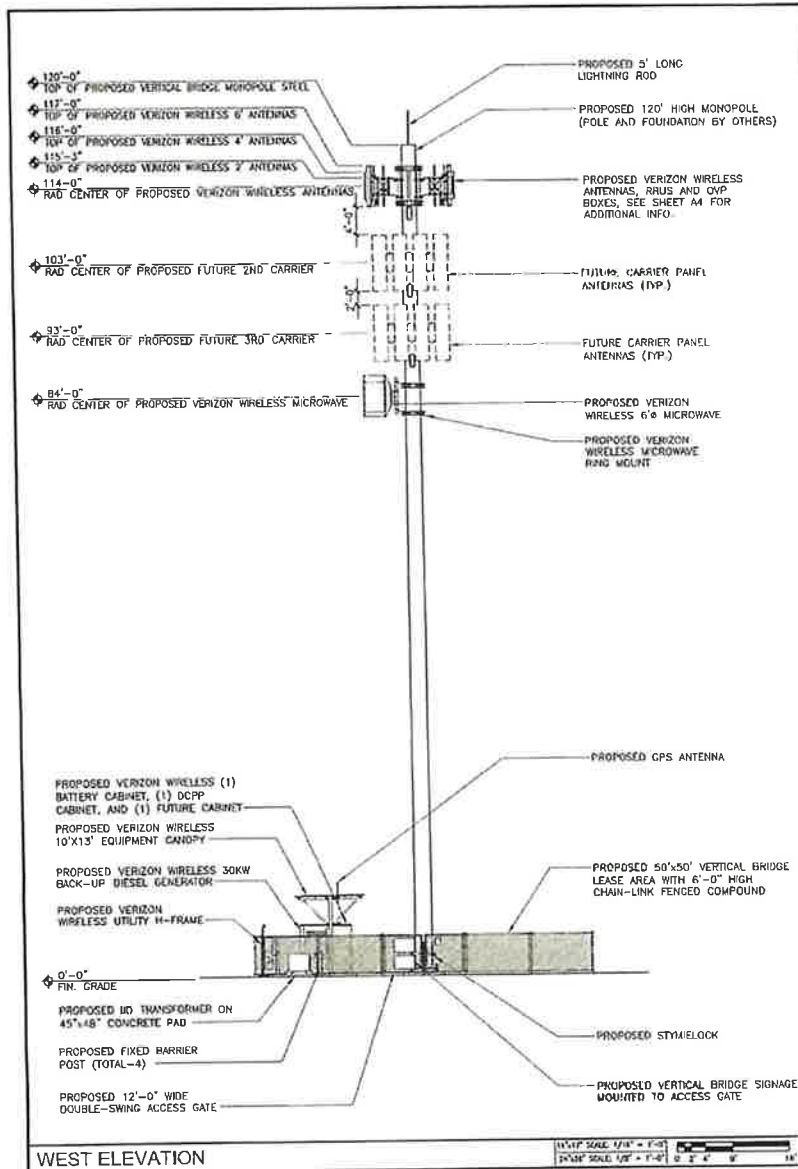
verticalbridge.
THE TOWERS LLC
2257 ATLANTIC AVE #310
GELBAY HEAD, FL 33144
561.406.1023

verizon
15505 SAND CANYON AVENUE,
IRVINE, CA 92618

MUNDO
US-CA-5878
FUZE PROJECT ID: 17661344
WMDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

SHEET TITLE
EQUIPMENT AND
ANTENNA PLAN

A4



ISSUE STATUS			
REV	DATE	DESCRIPTION	BY
1	05/14/18	ISSUED FOR PERMIT	PK
2	05/14/18	ISSUED FOR PERMIT	PK
3	05/14/18	ISSUED FOR PERMIT	PK

AD ASSURANCE DEVELOPMENT

1400 HUNTINGTON DR. | SUITE 300
SOUTH PASADENA, CA 91030
626.785.5019

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verticalbridge

THE TOWERS, LLC
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DELMAR BEACH, FL 33444
561.408.4073

verizon

15585 SAND CANYON AVENUE,
IRVINE, CA 92618

MUNDO

US-CA-5878

FUZE PROJECT ID: 17661344

MDG LOCATION ID: 5000924182

APN: 003-200-035-000

CALIPATRIA, CA 92257

SHEET TITLE:

ELEVATIONS

A5

PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 120' MONOPOLE WITH (2) MICROFIBER-52E ANTENNAS, (2) AR2253 ANTENNAS, (3) AR6418 ANTENNAS, (2) 430 WIRE, (1) MICROWAVE, (3) OSP BOXES, (1) GPS ANTENNA, REQUIRED ANTENNA CABLES, HOS JUMPER, (2) GROUND MOUNTED RADIO CABINETS, (1) EQUIPMENT CANOPY, (1) FIBER BOX, (1) 200A RC CABINET, (1) MANUAL SERVICE LIGHT SWITCH TIMER, (3) SERVICE LIGHTS, (1) 30KW BACK-UP DIESEL GENERATOR WITH 147 GAL DIESEL FUEL TANK, (2) RAISED CONCRETE PADS, UTILITY BACKBOARD AND MULTIMETER UTILITY SERVICE MOUNTED ON 1 1/2" FRAME WITH A 50x50" FENCED IN SAFE 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.

- 2025 CALIFORNIA BUILDING CODE
- 2025 CALIFORNIA TITLE 24
- 2025 CALIFORNIA FIRE CODE
- 2025 CALIFORNIA ELECTRIC CODE
- 2025 CALIFORNIA ENERGY CODE
- 2025 CALIFORNIA MECHANICAL CODE
- TIA/EIA-222-H OR LATEST EDITION
- ANY LOCAL BUILDING CODE AMENDMENTS TO THE ABOVE
- CITY/COUNTY ORDINANCES



US-CA-5878 MUNDO

APN: 003-200-035-000

CALIPATRIA, CA 92257

120' MONOPOLE

FUZE PROJECT NUMBER: 17661344

MDG LOCATION ID: 5000924182



VICINITY MAP
N.T.S.

DRAWING INDEX	
DRWG. #	TITLE
T1	TITLE SHEET
LS 1	TITLE DETAILS
LS 2	TOPOGRAPHIC SURVEY
A1	SITE PLAN
A2	PARTIAL ENLARGED SITE PLAN
A3	COMPOUND PLAN
A4	EQUIPMENT AND ANTENNA PLAN
A5	ELEVATIONS



LOCATION MAP
N.T.S.

PROJECT INFORMATION	
SITE NAME:	MUNDO
SITE NUMBER:	US-CA-5878
FUZE PROJECT NUMBER:	17661344
SITE ADDRESS:	APN: 003-200-035-000 CALIPATRIA, CA 92257 003-200-035-000
PARCEL #:	N/A
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-2 RE. GENERAL AGRICULTURAL ZONE
ZONING JURISDICTION:	COUNTY OF IMPERIAL
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:	2,500 SQ. FT.
GROUND ELEVATION:	144.52 (NAVD83)
LATITUDE (NAD 83):	33.292283° (31° 17' 32.22" N)
LONGITUDE (NAD 83):	-115.561911° (115° 33' 42.85" W)

EMERGENCY:
CALL 911



UNDERGROUND SERVICE ALERT

811



PROJECT DIRECTORY	
PROPERTY OWNER:	PAI LOLA INVESTMENTS LLC 112 PIXEL IRVINE, CA 92618
APPLICANT:	THE TOWERS, LLC 22 W ATLANTIC AVE, #310 DELRAY BEACH, FL 33444
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91103 CONTACT: BILL LEWIS PHONE: 626 765 5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT (IID)
TELCO COMPANY:	AT&T

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
1	07/20/2025	ISSUED FOR PERMIT	AD
2	07/20/2025	ISSUED FOR PERMIT	AD
3	07/20/2025	ISSUED FOR PERMIT	AD
4	07/20/2025	ISSUED FOR PERMIT	AD
5	07/20/2025	ISSUED FOR PERMIT	AD
6	07/20/2025	ISSUED FOR PERMIT	AD
7	07/20/2025	ISSUED FOR PERMIT	AD
8	07/20/2025	ISSUED FOR PERMIT	AD
9	07/20/2025	ISSUED FOR PERMIT	AD
10	07/20/2025	ISSUED FOR PERMIT	AD
11	07/20/2025	ISSUED FOR PERMIT	AD
12	07/20/2025	ISSUED FOR PERMIT	AD
13	07/20/2025	ISSUED FOR PERMIT	AD
14	07/20/2025	ISSUED FOR PERMIT	AD
15	07/20/2025	ISSUED FOR PERMIT	AD
16	07/20/2025	ISSUED FOR PERMIT	AD
17	07/20/2025	ISSUED FOR PERMIT	AD
18	07/20/2025	ISSUED FOR PERMIT	AD
19	07/20/2025	ISSUED FOR PERMIT	AD
20	07/20/2025	ISSUED FOR PERMIT	AD

AD

ASSURANCE
DEVELOPMENT

1499 HUNTINGTON DR. SUITE 305
SOUTH PASADENA, CA 91103
626 765 5079

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THE TOWERS, LLC
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL 33444
361 406 4079



15005 SAND CANYON AVENUE,
IRVINE, CA 92618

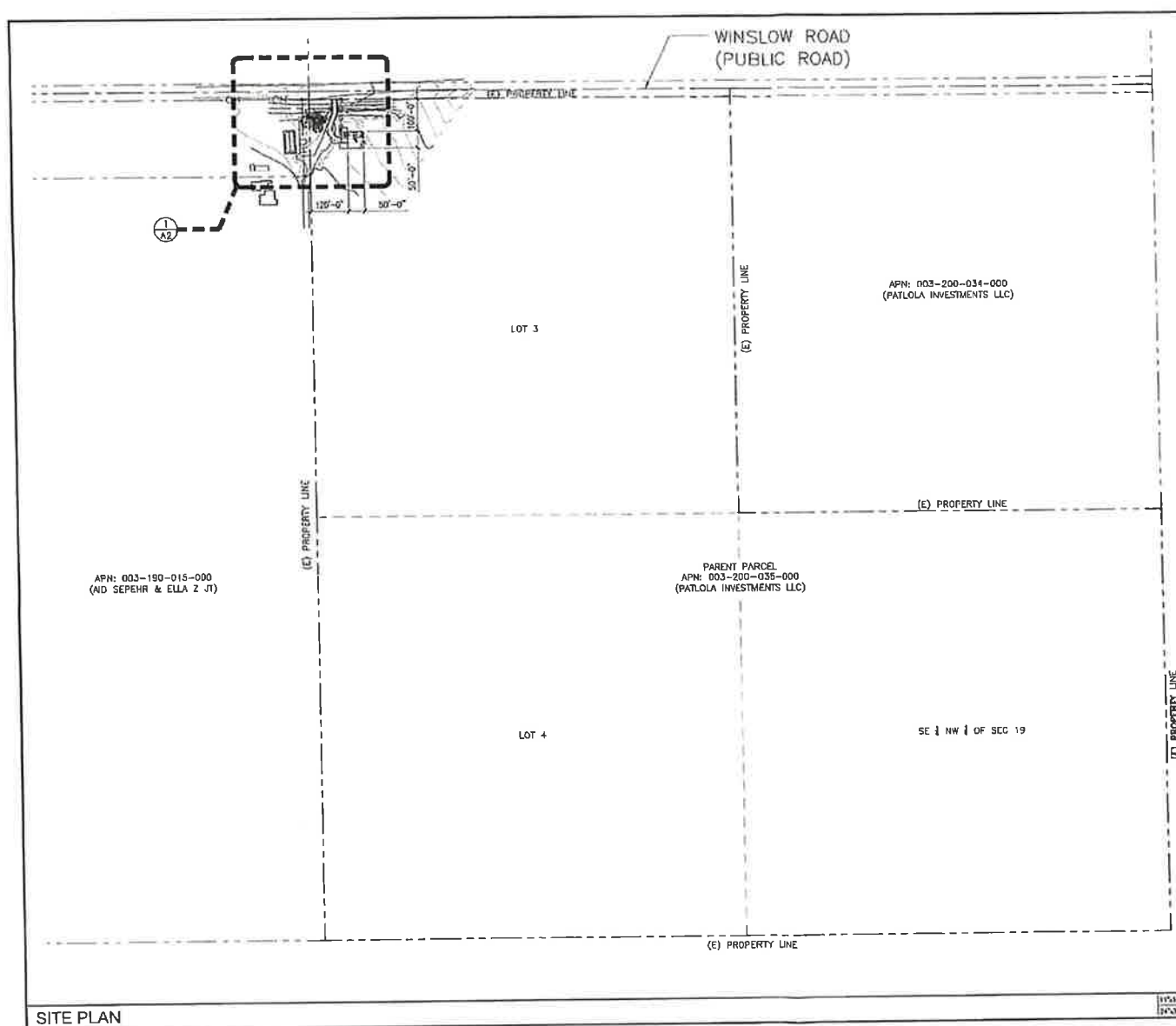
MUNDO
US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

SHEET TITLE

TITLE SHEET

T1

EEC ORIGINAL PKG

[illegible]

AD
**ASSURANCE
DEVELOPMENT**
14-014-1270000000 | SUITE 100
SOUTH PASADENA, CA 91107
626 785 6278

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THE TOWERS, LLC
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DESLAY TOWNSHIP, NJ 07344
561-806-4273

verizon
15505 SAND CANYON AVENUE
IRVINE, CA 92618



MUNDO
US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

SHEET TITLE

SITE PLAN

1	A1
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[illegible][illegible]

ASSURANCE DEVELOPMENT

1438 HUNTINGTON DR | SUITE 303
SOUTH PASADENA, CA | 91030
626.765.5014

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verizon
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MUNDO
US-CA-5878

US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

CHART TITLE

PARTIAL ENLARGED
SITE PLAN

A2

[illegible]

AD
**ASSURANCE
 DEVELOPMENT**
 1600 HUNTINGTON DR | SUITE 305
 SOUTH PASADENA CA 91103
 676 THU 3073

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THE TOWERS, LLC
12 WEST ATLANTIC AVE., 8TH FL.
DELRAY BEACH, FL 33444
561-625-4032

verizon
15505 SAND CANYON AVENUE
IRVINE, CA 92618

100

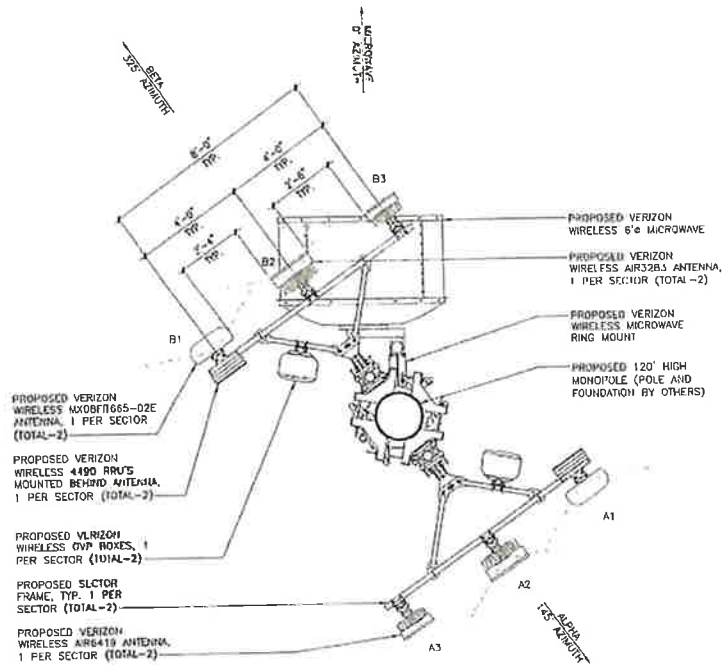
MUNDO
US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIFORNIA, CA 92257

1

SHEET TITLE

COMPOUND PLAN

A3



ANTENNA SCHEDULE											
SECTOR	POSITION	ANTENNAS	ANTENNA	MODEL NO.	QTY	MODEL NO.	LOCATION	QTY	MODEL NO.	QTY	TYPE
ALPHA	A1	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	A2	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	A3	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	A4	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
BETA	B1	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	B2	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	B3	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				
	B4	114'-0"	3000	WIRELESS 6" MICROWAVE	1	4000	TOWER				

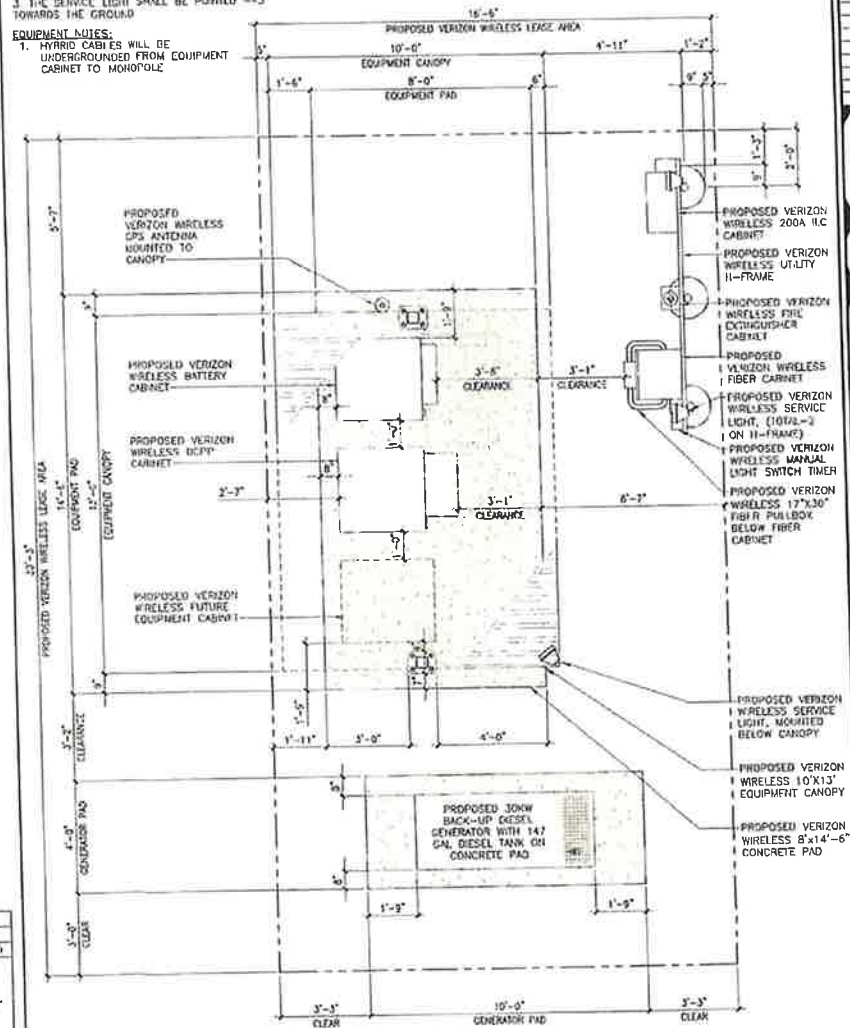
ANTENNA PLAN

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.

EQUIPMENT NOTES:

1. HYBRID CABLES WILL BE UNDERGROUND FROM EQUIPMENT CABINET TO MONOPOLE.



EQUIPMENT PLAN

ISSUE STATUS

REV	DATE	DESCRIPTION	BY
1	10/10/10	ISSUED FOR PERMIT	PK
2	10/10/10	REVISION 1	PK

AD ASSURANCE DEVELOPMENT

1430 HUNTINGTON BLVD, SUITE 205
SOUTH PASADENA, CA 91030
(626) 755-5079

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THE TONERS, LLC
22 W ATLANTIC AVE, #210
DE BEACH, FL 33444
(561) 435-8078

verizon

15565 SAND CANYON AVENUE,
IRVINE, CA 92618

MUNDO

US-CA-5878
FUZE PROJECT ID: 17661344
MDG LOCATION ID: 5000924182
APN: 003-200-035-000
CALIPATRIA, CA 92257

EQUIPMENT AND ANTENNA PLAN

A4

[illegible]



Attachment 10

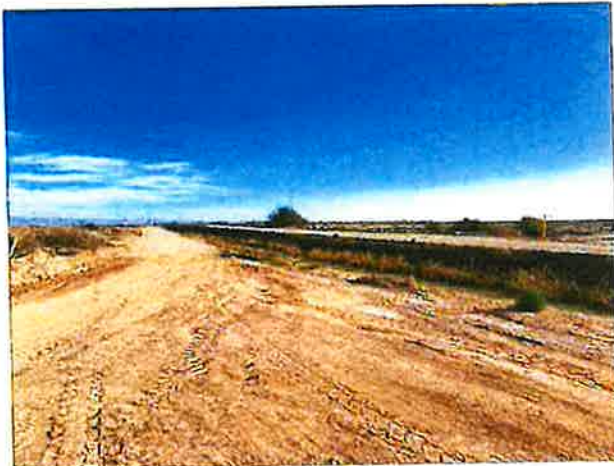
Photo Simulations

AERIAL MAP



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EXISTING



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REV	DATE	REVISIONS	BY
0	3/16/2024	ISSUED FOR SUBMITTAL	JTY

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US-CA-587B
MUNDO
WINSLOW ROAD
CALIPATRIA, CA 92257

VIEW

A

SHEET

1 / 4

AERIAL MAP



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0	2/11/2024	ISSUED FOR SUBMITTAL	JTY

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US-CA-5878
MUNDO
WINSLOW ROAD
CALIPATRIA, CA 92257

VIEW

B

SHEET

2 / 4

AERIAL MAP



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 DRAPIR	 ASSURANCE DEVELOPMENT	NO	DATE	REVISIONS	BY
		1	07/14/2024	ISSUED FOR SUBMITTAL	JFY
CONTACT: JEFFREY W. EMAIL: JEFFREY@DRAPIR.COM PHONE: 949.232.7111 WWW.DRAPIR.COM					

verizon

vertical

US-CA-5878
MUNDO
WINSLOW ROAD
CALIPATRIA, CA 92257

VIEW	SHEET
C	3 / 4

AERIAL MAP



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 DRAFTLINK CONCEPTS - DESIGN - PERMITS 3000 N. 1ST AVE. SUITE 100 MILPITAS, CA 95035 TEL: 408.261.1111 WWW.DRAFTLINK.COM	 AD ASSURANCE DEVELOPMENT	R/S 1/16/2026	DATE 1/16/2026	REVISIONS REVISED FOR SUBMITTAL	BY JFY	 	US-CA-5878 MUNDO WINSLOW ROAD CALIPATRIA, CA 92257	VIEW	SHEET
								D	4 / 4



Attachment 8

Verizon Coverage Maps

Coverage Plots

Site Name

MUNDO

Date: 02/06/2026

EEC ORIGINAL PKG



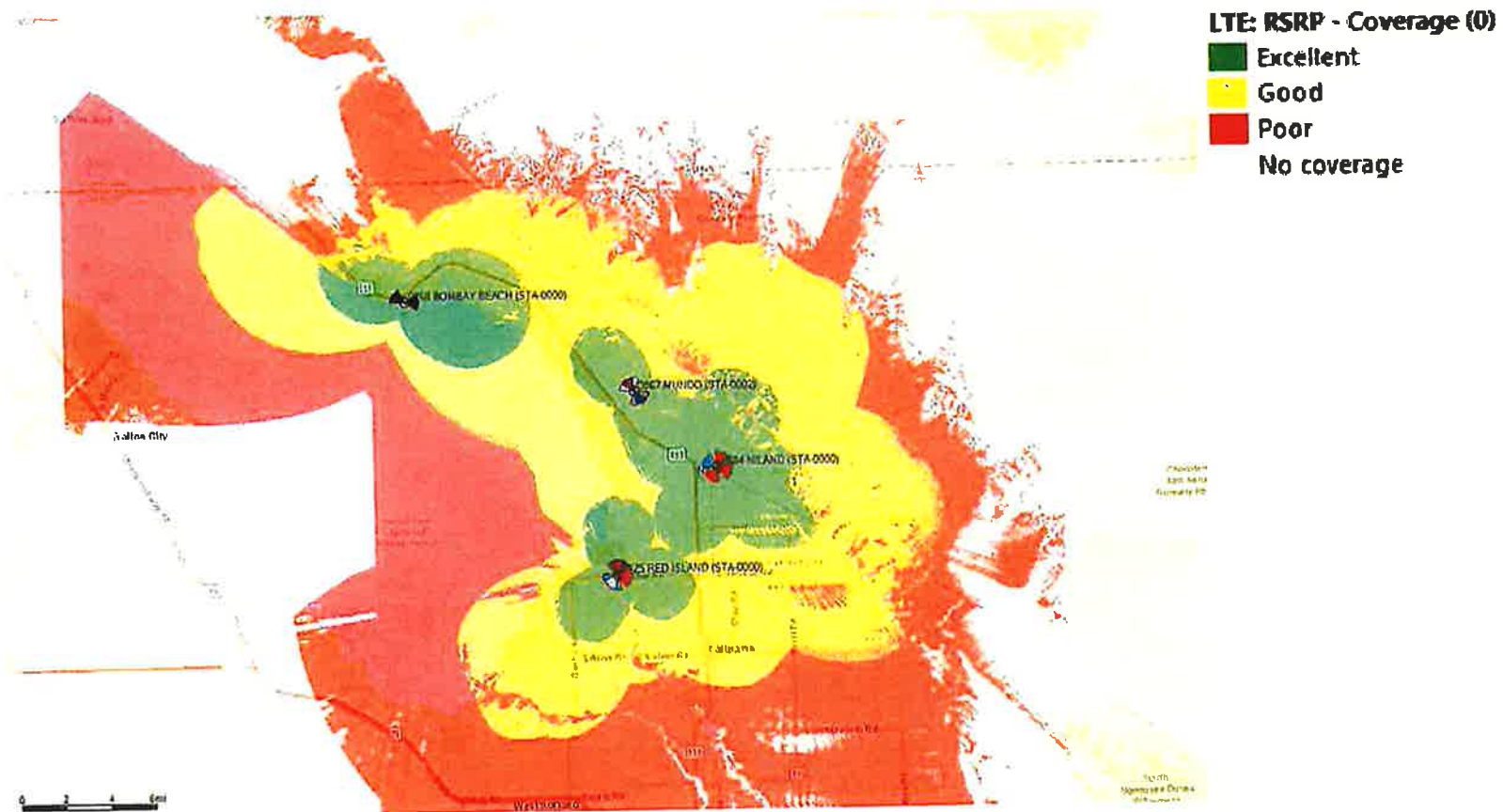
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10



10

Coverage with Site

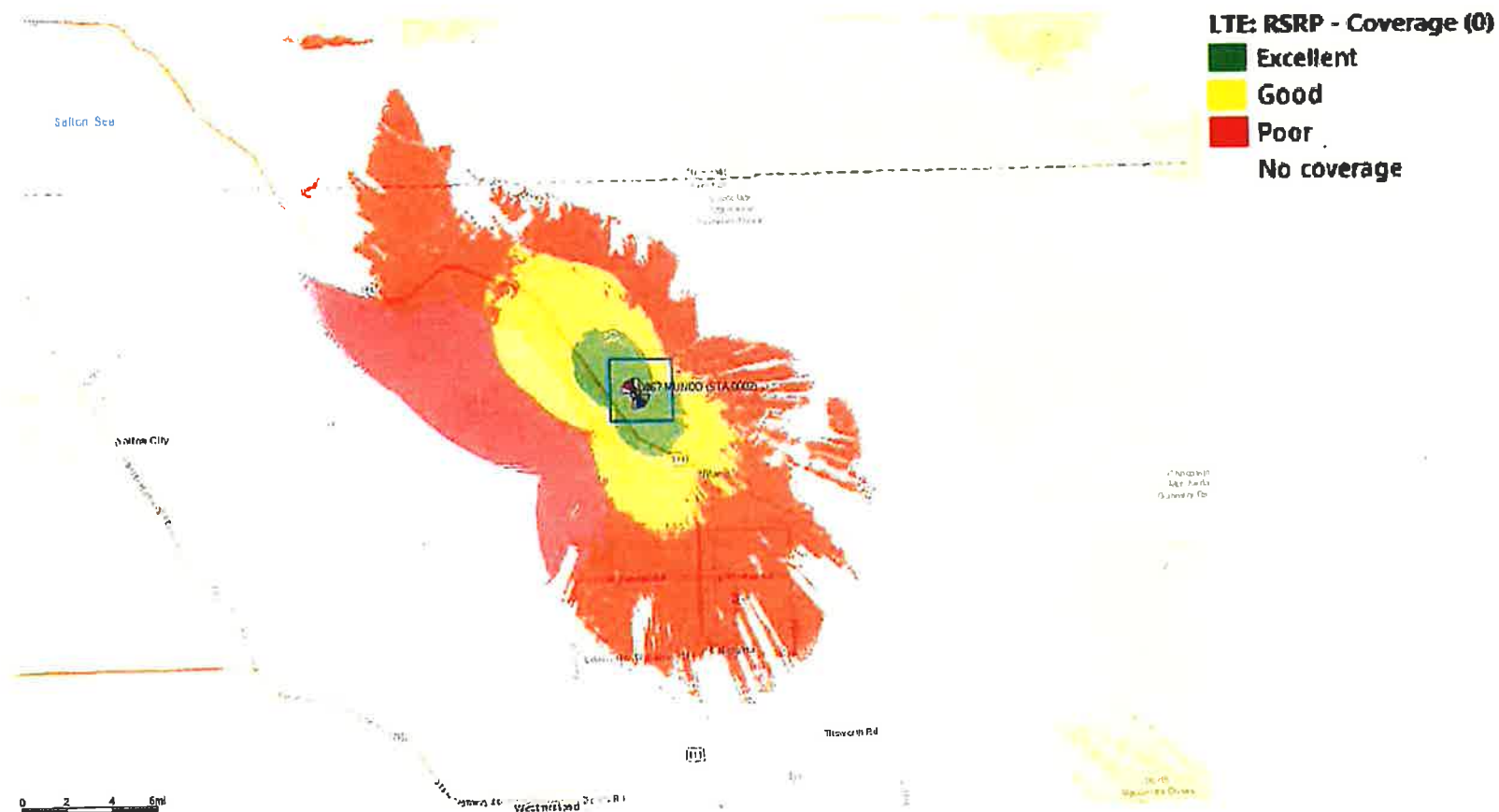


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Coverage Site Alone



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Attachment 2

Statement of Code Compliance

STATEMENT OF CODE COMPLIANCE
WCF CONDITIONAL USE APPLICATION
US-CA-5878 MUNDO
Submitted to the County of Imperial
Planning Division

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:

I. Wireless Facilities Requirements

Division 24 – Communication Facilities

- **Chapter 1 - Communication Facilities**

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

Wireless Facilities Requirements

Imperial County Municipal Code
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;
- 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) on APN 003-200-035-000. 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-2 zone, in which utility and communication facilities are allowed upon approval of a conditional use permit. (Section 90508.02(r))

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 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 A5 of Attachment 7, 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. Please see Attachment 8, Verizon Coverage Maps.

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; however, the tower does comply with the height limit in the A-2 zone should the area ever become a 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 proposed tower is located outside of the three-quarter-mile range of a designated corridor; however, it is proposed to be one hundred twenty (120) feet with three co-located carriers.

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: Acknowledged. No exception to height limitations is requested.

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 13, 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; cabling will be routed through the interior of the pole.

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 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. The nearest residential zone is approximately 20,854 ft from the proposed facility, and the nearest residence is located 21,000 ft from the proposed facility.

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-2 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 a 12' wide and 180' long gravelled access road stemming from Winslow Road. 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 A5 of Attachment 7, 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 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 Sheet A3 in Attachment, 7 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 13, EME Report, and Attachment 11, FAA Clearance Letter 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.

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;
- 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:

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 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.

92401.06 – Alternative 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 10, 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 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 13, EME Report for documentation of RF emissions.

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.

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 nearby 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.

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;

Applicants' Response: Adjacent land uses, zoning, and general plan designation, are shown on the Alternative Sites Analysis. Please see Attachment 9. Access and setbacks are provided on Sheet A1 of Attachment 7, Zoning Drawings, and elevations are provided on Sheet A5.

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

Applicants' Response: The legal description of the parent tract is provided on Sheet LS-1 and the leased parcel legal description is provided on Sheet LS-2 of Attachment 9, Zoning Drawings.

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

Applicants' Response: Please see Figure C in Attachment 9, Alternative Sites Analysis.

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;

Applicants' Response: There are no existing towers within a 3 mile radius.

E. A landscape plan showing specific landscape materials;

Applicants' Response: No landscape plan is proposed.

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

Applicants' Response: The proposed fence is to be a 6' chain link fence. Applicants are open to further discussion of the fencing should Staff request revisions.

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;

Applicants' Response: Applicants' have provided a detailed response to all applicable standards and requirements in Section 92401.04 General requirements, as provided in this Statement of Code Compliance, and the project will comply with 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;

Applicants' Response: The proposed tower is designed to 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;

Applicants' Response: The backhaul for this tower has not yet been determined.

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: Applicants conducted thorough research on the surrounding existing towers and towers for the proposed facility. There are no existing towers within a 2-mile radius of the site. No other structures were found to be adequate for the height and structural integrity required for the proposed facility. Please see Attachment 9, Alternative Sites Analysis for further demonstration of this research.

92401.10 – Modification 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 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.

92401.12 – 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.

Applicants' Response: Under Cal. Gov. Code §65964(b), permit terms of less than 10 years are presumed to be unreasonable absent public safety reasons or substantial land use reasons. Therefore, Applicants respectfully request a minimum permit term of no less than 10 years, in accordance with state law.

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.

Applicants' Response: Applicants acknowledge this requirement. The proposed tower is designed to accommodate co-location of additional antennas, and any co-located facilities will operate under the same permit term in accordance with County Code §92401.12(B).

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.

Applicants' Response: Acknowledged.

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.

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. Applicants are open to discussions with the IVECA regarding a public benefit agreement.

END OF STATEMENT OF CODE COMPLIANCE.