

PROJECT REPORT

TO: **PLANNING COMMISSION** **AGENDA DATE** November 18, 2021
FROM: **Planning & Development Services Dept.** **AGENDA TIME** 9:00 am/No. 3

AT&T California d.b.a. Pacific Bell
PROJECT TYPE: CUP #21-0009 SUPERVISOR DIST. #4
LOCATION: 313 E. Main St., APN: 021-073-007-000
Niland, CA PARCEL SIZE: +/- 7,750 Sq.Ft.
Urban (Niland Urban Area Plan)
GENERAL PLAN (existing) (Light Industrial) GENERAL PLAN (proposed) N/A
ZONE (existing) M-1 (Light Industrial) ZONE (proposed) N/A

GENERAL PLAN FINDINGS CONSISTENT INCONSISTENT MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: 11/18/2021
 APPROVED DENIED OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____
 APPROVED DENIED OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 09/09/2021
INITIAL STUDY: #21-0012

NEGATIVE DECLARATION MITIGATED NEG. DECLARATION EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
AG / APCD	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
E.H.S.	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
FIRE / OES	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
OTHER				

Quechan Historic Preservation, IID

REQUESTED ACTION:

IT IS RECOMMENDED THAT YOU CONDUCT A PUBLIC HEARING, THAT YOU HEAR ALL OPPONENTS AND PROPONENTS OF THE PROPOSED PROJECT, STAFF WOULD THEN RECOMMEND THAT YOU APPROVE CONDITIONAL USE PERMIT #21-0009 BY TAKING THE FOLLOWING ACTIONS:

- 1) ADOPT THE NEGATIVE DECLARATION BY FINDING THAT THE PROPOSED PROJECT WOULD NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS RECOMMENDED AT THE ENVIRONMENTAL EVALUATION COMMITTEE HELD ON SEPTEMBER 9, 2021;
- 2) MAKE THE DE MINIMUS FINDINGS AS RECOMMENDED AT THE SEPTEMBER 9, 2021 EEC HEARING THAT THE PROJECT WILL NOT INDIVIDUALLY OR CUMULATIVELY HAVE AN ADVERSE EFFECT ON FISH AND WILDLIFE RESOURCES, AS DEFINED IN SECTION 711.2 OF THE FISH AND GAME CODES; AND,
- 3) ADOPT THE ATTACHED RESOLUTIONS AND SUPPORTING FINDINGS, APPROVING CONDITIONAL USE PERMIT (CUP) #21-0009 SUBJECT TO ALL THE CONDITIONS, AND AUTHORIZE THE PLANNING & DEVELOPMENT SERVICES DIRECTOR TO SIGN THE CUP CONTRACT UPON RECEIPT FROM THE PERMITTEE;

STAFF REPORT
PLANNING COMMISSION MEETING
November 18, 2021

Project Name: **AT&T California d.b.a. Pacific Bell**
 Conditional Use Permit #21-0009/ Initial Study #21-0012

Applicant: **AT&T California d.b.a. Pacific Bell**
 2700 Watt Avenue
 Sacramento, CA 95821

Project Location:

The project is being proposed at 313 E. Main Street, Niland, CA within the townsite of Niland, approximately 7.5 miles north of the Calipatria Municipal Airport. The parcel is approximately 7,750 square feet in size, and the monopole will be placed in the rear yard behind the existing AT&T Niland Facility. The parcel is legally described as the west fifty (50) feet of Lots 16, 17, and 18 in Block 35 of Amended Map Niland Addition Number 1, in an unincorporated area of the County of Imperial, State of California, according to map thereof NO. 170 filed in Book 3, Page 13 of Official Maps, in the Office of the County Recorder of Imperial County, and is further identified as Assessor's Parcel Number 021-073-007-000. (See Attachment "A" Vicinity Map, for reference)

Project Summary:

The applicant, AT&T California d.b.a. Pacific Bell, intends to build and maintain a 40-foot monopole with an antenna and waveguide. According the applicant, *"the US Navy requires enhanced services to the Navy Base that conducts Special Operations Desert Training north of Niland, CA. This solution required a secure connection to our Core Network that we could guarantee access and maintenance on during the event of any system malfunction. This base and the facilities that will ride on the new microwave path are vital to the Base Operations. The only existing tower in the area would result in interference from the helicopter ingress/egress operations at the site. For these reasons, a new monopole was proposed on the existing Niland AT&T Central Office footprint."*

The entire parcel is approximately 7,750 square feet, and the monopole will be placed in the rear yard behind the existing AT&T Niland Facility. The proposed monopole will be ground mounted and stand at 40-feet tall. An attached 48-inch diameter antenna will be located 35-feet above ground plane. Due to an exemption from the FAA and because of the height of the monopole, the proposed construction will not be required to have lighting.

The monopole will be painted in a non-reflective earth tone color, and cable trays shall be routed to the existing wall penetrations at the south elevation of the existing building on site. All accessory equipment shall be located in the interior of the existing building at the site. No modifications are being proposed to the existing building envelope.

Environment Setting:

The existing land uses surrounding the project site consist of a nonconforming single-family residence to the east that parcel is zoned M-1 (Light Industrial Zone). A vacant lot is directly to the west of the project site that is also zoned M-1 (Light Industrial Zone). The project site abuts Main Street and across this street to the north is an existing RV park, whose parcel is currently zoned R-4 (Mobile Home Park or Subdivision Zone/High Density Residential Zone). Directly to the south is another nonconforming single-family residence that is zoned M-1 (Light Industrial Zone). The project site is occupied by AT&T and currently provides local telephone and Ethernet services to Niland.

Land Use Analysis:

The project site is zoned M-1 (Light Industrial) per Zoning Map #11A and is designated as Urban (Niland Urban Area Plan under the Imperial County General Plan). Cellular towers, including any necessary support equipment, are allowed in the M-1 zone with the approval of a Conditional Use Permit per Title 9, Division 5, Chapter 15, Section 90515.02; however, Title 9, Division 24 Telecommunication Facilities Ordinance, requires for the Planning Commission to make a finding that the proposed site would have the least possible environmental and visual effect on the community.

Surrounding Land Use Ordinance:

DIRECTION	CURRENT LAND USE	ZONING	GENERAL PLAN
Project Site	Niland AT&T Central Office	M-1	Niland Urban Area Plan
North	RV Park	R-4	Niland Urban Area Plan
South	Nonconforming Single Family Residence	M-1	Niland Urban Area Plan
East	Nonconforming Single Family Residence	M-1	Niland Urban Area Plan
West	Vacant	M-1	Niland Urban Area Plan

Environmental Review:

The proposed project was environmentally assessed and reviewed by the Environmental Evaluation Committee (EEC). The Committee consists of a seven (7) member panel, integrated by the Director of Environmental Health Services, Imperial County Fire Chief, Agricultural Commissioner, Air Pollution Control Officer, Director of the Department of Public Works, Imperial County Sheriff, and the Director of Planning and Development Services. The EEC members have the principal responsibility for reviewing CEQA documents for the County of Imperial. On September 9, 2021, after review by the EEC members, the members recommended a Negative Declaration.

The project was publicly circulated from September 20, 2021 through October 11, 2021; comments were received, reviewed, and made part of this project.

Staff Recommendation:

It is recommended that you conduct a public hearing, that you hear all opponents and proponents of the proposed project, staff would then recommend that you approve Conditional Use Permit #21-0009 by taking the following actions:

- 1) Adopt the Negative Declaration by finding that the proposed project would not have a significant effect on the environment as recommended at the Environmental Evaluation Committee held on the September 9, 2021;
- 2) Make the De Minimus findings as recommended at the September 9, 2021 EEC hearing that the project will not individually or cumulatively have an adverse effect on fish and wildlife resources, as defined in Section 711.2 of the Fish and Game Codes; and,
- 3) Adopt the attached Resolution(s) and supporting findings, approving Conditional Use Permit (CUP) #21-0009 subject to all the conditions, and authorize the Planning & Development Services Director to sign the CUP contract upon receipt from the permittee.

Prepared By: Jeanine Ramos, Planner I
Planning & Development Services



Reviewed By: Michael Abraham, AICP, Assistant Director
Planning & Development Services



Approved By: Jim Minnick, Director
Planning & Development Services



- Attachments:
- A. Vicinity Map
 - B. Site Plan
 - C. Planning Commission Resolutions CUP #21-0009
 - D. CEQA Resolutions CUP #21-0009
 - E. Conditions of Approval CUP #21-0009
 - F. Environmental Evaluation Committee Package IS #21-0012
 - G. Airport Land Use Commission Package ALUC #04-21
 - H. Application Package
 - I. Revisions to the Application Package Dated September 23, 2021
 - J. Comment Letters

Attachment A: Vicinity Map

PROJECT LOCATION MAP

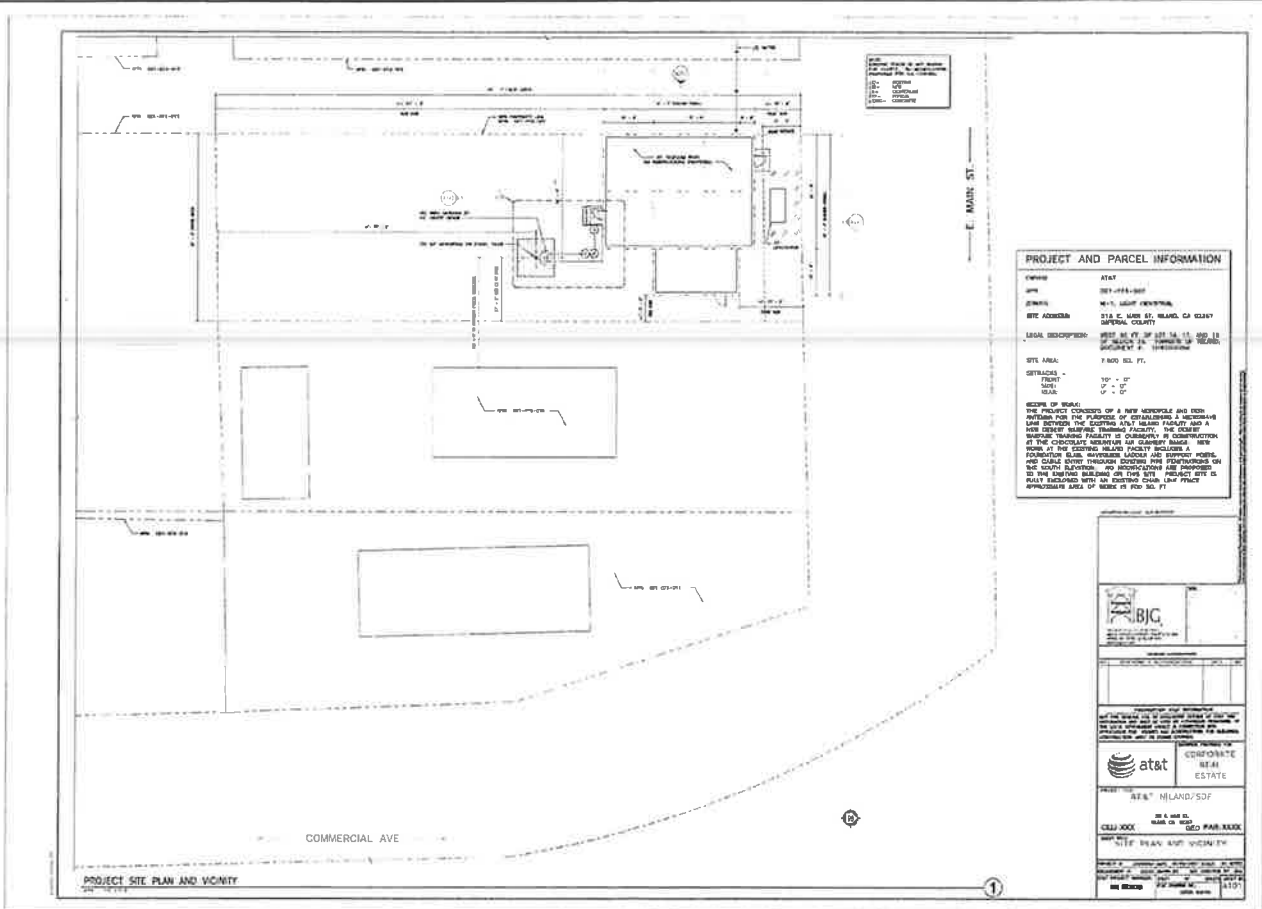


**AT&T CALIFORNIA D.B.A. PACIFIC
BELL
CUP #21-0009
APN 021-073-007-000**

-  PROJECT LOCATION
-  TOWER LOCATION



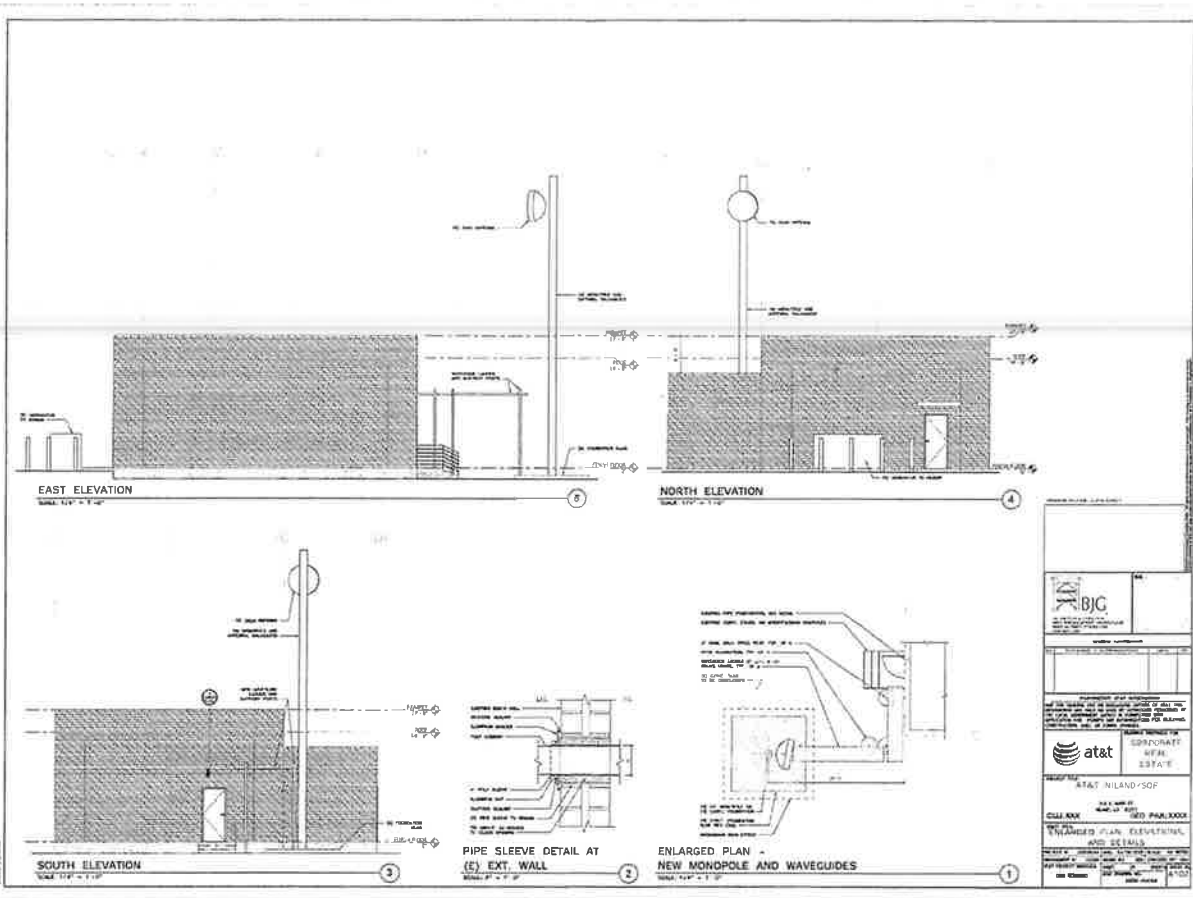
Attachment B: Site Plan



PROJECT AND PARCEL INFORMATION

OWNER: AT&T
 DATE: 08/14/2001
 PROJECT: 90-1, 90-2, 90-3, 90-4, 90-5, 90-6, 90-7, 90-8, 90-9, 90-10, 90-11, 90-12, 90-13, 90-14, 90-15, 90-16, 90-17, 90-18, 90-19, 90-20, 90-21, 90-22, 90-23, 90-24, 90-25, 90-26, 90-27, 90-28, 90-29, 90-30, 90-31, 90-32, 90-33, 90-34, 90-35, 90-36, 90-37, 90-38, 90-39, 90-40, 90-41, 90-42, 90-43, 90-44, 90-45, 90-46, 90-47, 90-48, 90-49, 90-50, 90-51, 90-52, 90-53, 90-54, 90-55, 90-56, 90-57, 90-58, 90-59, 90-60, 90-61, 90-62, 90-63, 90-64, 90-65, 90-66, 90-67, 90-68, 90-69, 90-70, 90-71, 90-72, 90-73, 90-74, 90-75, 90-76, 90-77, 90-78, 90-79, 90-80, 90-81, 90-82, 90-83, 90-84, 90-85, 90-86, 90-87, 90-88, 90-89, 90-90, 90-91, 90-92, 90-93, 90-94, 90-95, 90-96, 90-97, 90-98, 90-99, 90-100

Professional seal and stamps for the architect and engineer, including the logo for 'at&t' and 'BE&E'.



BJC BUILDING JOINT CONTRACTORS 1000 BROADWAY, SUITE 1000 NEW YORK, NY 10018 TEL: (212) 512-1000 FAX: (212) 512-1001	
PROJECT NO. 100-100-100-100	
DRAWING NO. 100-100-100-100	
DATE: 10/10/10	
PROJECT: AT&T BUILDING - 550 MADISON AVENUE ARCHITECT: SKIDMORE OWINGS & MERRILL LLP CONTRACTOR: BJC BUILDING JOINT CONTRACTORS	
DESIGNER: BJC BUILDING JOINT CONTRACTORS CHECKED: [Name] APPROVED: [Name]	

**Attachment C: Planning Commission
Resolutions CUP #21-0009**

RESOLUTION NO. 2021-

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING CONDITIONAL USE PERMIT #21-0009 AND CONDITIONS OF APPROVAL FOR AT&T CALIFORNIA D.B.A. PACIFIC BELL.

WHEREAS, AT&T California d.b.a. Pacific Bell, has submitted an application for Conditional Use Permit #21-0009 proposing to build and maintain a 40-foot monopole with an antenna and waveguide;

WHEREAS, a Negative Declaration and Findings have been prepared in accordance with the requirements of the California Environmental Quality Act, the State Guidelines, and the County's "Rules and Regulations to Implement CEQA, as Amended";

WHEREAS, the Planning Commission of the County of Imperial has been delegated with the responsibility of adoptions and certifications;

WHEREAS, public notice of said application has been given, and the Planning Commission has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on November 18, 2021;

WHEREAS, on September 9, 2021, the Environmental Evaluation Committee heard the proposed project and recommended the Planning Commission adopt the Negative Declaration;

NOW, THEREFORE, the Planning Commission of the County of Imperial **DOES HEREBY RESOLVE** as follows:

SECTION 1. The Planning Commission has considered Conditional Use Permit #21-0009 and the Conditions of Approval prior to approval; the Planning Commission finds and determines that the Conditional Use Permit and Conditions of Approval are adequate and prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA) which analyzes environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning Law and the County of Imperial, the following findings for the approval of Conditional Use Permit #21-0009 have been made as follows:

A. The proposed use is consistent with goals and policies of the adopted County General Plan.

The General Plan designates the subject site as a part of the Niland Urban Area Plan under the Land Use Element and is zoned "M-1" (Light Industrial) per Imperial County Land Use Ordinance. The project is found consistent with the goals and

policies of the Imperial County General Plan Land Use Element and, therefore, consistent with the County's General Plan.

B. The proposed use is consistent with the purpose of the zone or sub-zone within which the use will be used.

The purpose of the project is to construct a new 40-foot monopole with an antenna and waveguide. Pursuant to Title 9 Division 5 Chapter 15: M-1 (Light Industrial) Zone, Section 90515.02; communication towers are a permitted use with the approval of a Conditional Use Permit and, therefore, the proposed use is consistent with the purpose of the M-1 zone.

C. The proposed use is listed as a use within the zone or sub-zone or is found to be similar to a listed or similar conditional use according to the procedures of Section 90203.00.

The proposed monopole is listed as a use subject to a Conditional Use Permit in Imperial County Land Use Ordinance, Section 90515.02.

D. The proposed use meets the minimum requirements of Title 9 applicable to the use and complies with all applicable laws, ordinances and regulation of the County of Imperial and the State of California.

The Project complies with the minimum requirements of Title 9 by obtaining a Conditional Use Permit pursuant to Title 9, Division 5, and Section 90515.02. The Conditions of Approval will further ensure that the project complies with all applicable regulations of the County of Imperial and the State of California. Therefore, the proposed project shall meet the minimum requirements of the Land Use Ordinance, Section 90203.00.

E. The proposed use will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.

The proposed project entails a Conditional Use Permit for a proposed 40-foot monopole. The parcel is designated to be a part of the "Niland Urban Area Plan" by the Imperial County General Plan and zoned M-1 (Light Industrial) pursuant to Title 9 Division 5 Chapter 15 Section 90515.02. The surrounding areas consist of a vacant lot directly to the west of the project site that is zoned M-1 (Light Industrial), and abuts a nonconforming single-family residence to the east that is also zoned M-1. The project site abuts Main Street and across this street to the north is an existing RV park, currently zoned R-4 (Mobile Home Park or Subdivision Zone/High Density Residential Zone). To the south is a nonconforming single-family residence that is also zone M-1. The proposed use of the 40-foot monopole will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.

F. The proposed use does not violate any other law or ordinance.

The proposed project will be subject to the Conditional Use Permit and current Federal, State, and Local regulations. The project use does not violate any law or ordinance.

G. The proposed use is not granting a special privilege.

The project is a permitted use subject to approval of a Conditional Use Permit #21-0009 under Land Use Ordinance, Section 92404.00 *et. seq.* and will not grant a special privilege.

NOW, THEREFORE, based on the above findings, the Imperial County Planning Commission **DOES HEREBY APPROVE** Conditional Use Permit #21-0009, subject to the Conditions of Approval.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certify that the preceding resolution was taken by the Imperial County Planning Commission at a meeting conducted on November 18, 2021 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

Jim Minnick,
Director of Planning & Development Services
Secretary to the Planning Commission

**Attachment D: CEQA Resolutions
CUP #21-0009**

RESOLUTION NO. 2021-

A RESOLUTION OF THE PLANNING COMMISSION FOR THE COUNTY OF IMPERIAL, CALIFORNIA, ADOPTING “NEGATIVE DECLARATION” (INITIAL STUDY #21-0012) FOR CONDITIONAL USE PERMIT #21-0009.

WHEREAS, on August 27, 2021, a Public Notice was mailed to the surrounding property owners advising them of the Environmental Evaluation Committee hearing scheduled for September 9, 2021;

WHEREAS, a Negative Declaration and CEQA Findings were prepared in accordance with the requirements of the California Environmental Quality Act, State Guidelines, and the County’s “Rules and Regulations to Implement CEQA, as Amended”; and

WHEREAS, on September 9, 2021, the Environmental Evaluation Committee heard the project and recommended the Planning Commission of the County of Imperial to adopt the Negative Declaration for Conditional Use Permit #21-0009; and

WHEREAS, the Negative Declaration was circulated for 20 days from September 20, 2021 to October 11, 2021;

WHEREAS, the Planning Commission of the County of Imperial has been designated with the responsibility of adoptions and certifications; and

NOW, THEREFORE, the Planning Commission of the County of Imperial **DOES HEREBY RESOLVE** as follows:

The Planning Commission has reviewed the attached Negative Declaration (ND) prior to approval of Conditional Use Permit #21-0009. The Planning Commission finds and determines that the Negative Declaration is adequate and was prepared in accordance with the requirements of the Imperial County General Plan, Land Use Ordinance and the California Environmental Quality Act (CEQA), which analyses environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein are true, correct and valid; and
2. That the Planning Commission has reviewed the attached Negative Declaration (ND) for Conditional Use Permit #21-0009 and considered the information contained in the Negative Declaration together with all comments received during the public review period and prior to approving the Conditional Use Permit; and
3. That the Negative Declaration reflects the Planning Commission independent judgment and analysis.

NOW, THEREFORE, the County of Imperial Planning Commission **DOES HEREBY ADOPT** the Negative Declaration for Conditional Use Permit #21-0009.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certified that the preceding Resolution was taken by the Planning Commission at a meeting conducted on November 18, 2021 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

Jim Minnick, Director of Planning & Development Services
Secretary to the Imperial County Planning Commission

**Attachment E: Conditions of
Approval CUP #21-0009**

1 Recorded Requested By and
2 When Recorded Return To:

3 Imperial County Planning & Development Services
4 801 Main Street
5 El Centro California 92243

6 **AGREEMENT FOR CONDITIONAL USE PERMIT CUP #21-0009**
7 (Wireless Telecommunications Tower)
8 (021-073-007-000)
9 **(Approved at Planning Commission _____)**

10 This Agreement is made and entered into on this _____, day of _____, 2021 by and
11 between AT&T California d.b.a.Pacific Bell (2700 Watt Avenue, Sacramento, CA 95821)
12 hereinafter referred to as Permittee, and the COUNTY OF IMPERIAL, a political
13 subdivision of the State of California, (hereinafter referred to as "COUNTY").

14 **RECITALS**

15 **WHEREAS**, Permittee is the owner, and/or operator, and/or successor in interest in
16 certain land in Imperial County identified as Assessor's Parcel Number 021-073-007-
17 000, and further identified by the following legal description: as the west fifty (50) feet of
18 Lots 16, 17, and 18 in Block 35 of Amended Map Niland Addition Number 1, in an
19 unincorporated area of the County of Imperial, State of California, according to map
20 thereof NO. 170 filed in Book 3, Page 13 of Official Maps, in the Office of the County
21 Recorder of Imperial County, and;

22 **WHEREAS**, Permittee, and/or any subsequent owner(s) would be required to and
23 intend to fully comply with all of the terms and conditions of the project as specified in
24 this Conditional Use Permit (CUP). In the event of a conflict between the attached CUP
25 Agreement and conditions, these conditions govern; and

26 **WHEREAS**, Permittee has requested a permit to construct and operate a monopole,
27 40-foot above ground level "AGL" , including therewith the necessary ancillary antennas
28 equipment; and

WHEREAS, Permittee will not operate any type of use other than specified herein
and within the application; and

WHEREAS, Permittee intends to operate the monopole for its own use, Permittee
shall at some future date allow another "compatible" use communication, or electronic

1 transmission operator (hereinafter referred to as a "subsidiary user"), to use the same
2 tower, thereby minimizing the number of towers required within the confines of the
3 County; and

4 **WHEREAS**, the County encourages multiple use (co-locators) of such towers to the
5 extent that sharing of towers is compatible in use, frequency and meets applicable
6 regulatory standards of all permitting jurisdictions; and

7 **WHEREAS**, though the sharing of tower space is physically possible, it is recognized
8 that additional structural considerations must be addressed and if applicable, permitted
9 by the Building Division of the Imperial County Planning and Development Services
10 Department, to assure that the tower is structurally adequate.

11 **NOW THEREFORE**, the County hereby issues CUP #21-0009 subject to all of the
12 following conditions.

13 **GENERAL CONDITIONS:**

14 The "GENERAL CONDITIONS" are shown by the letter "G". These conditions are conditions that are either routinely
15 and commonly included in all Conditional Use permits as "standardized" conditions and/or are conditions that the
16 Imperial County Planning Commission has established as a requirement on all CUP's for consistent application and
enforcement. The Permittee is advised that the General Conditions are as applicable as the SITE SPECIFIC
conditions!

17 **G1 COSTS:**

18 Permittee shall pay any and all amounts as determined by the County to defray all costs
19 for the review of reports, field inspections, enforcement, monitoring, or other activities
20 related to compliance with this permit, County Ordinances, and/or other laws that apply.
Any billing against this project, now or in the future, by the Planning and Development
Services Department or any County Department for costs incurred as a result of this permit,
shall be billed through the Planning and Development Services Department.

21 **G2 AUDIT OF BILLS:**

22 Permittee shall have the right to have any bill audited for clarification or correction. In the
23 event Permittee request an audit or an explanation of any bill, it shall be in writing to the
24 Planning and Development Services Department. Permittee shall bring the account current
25 including any amount due under a "disputed" billing statement, before any audit is
26 performed. If the amount disputed is the result of a Department other than the Planning and
27 Development Services Department the explanation or audit shall be performed by said
28 Department and a report provided to both the Permittee and the Planning and Development
Services Department.

1 **G3 PERMITS/LICENSES:**

2 The Permittee shall obtain any and all local, state, and/or federal permits, licenses,
3 contracts, and/or other approvals for the construction and/or operation of this project. This
4 shall include, but not be limited to Health, Building, Sanitation, APCD, Public Works, Sheriff,
5 Regional Water Quality Control Board, Offices of Emergency Services, Division of Mines
and Geology, etc. Permittee shall like-wise comply with all such permit requirements for
the life of the project. Additionally, Permittee shall submit a copy of any such additional
permit, license and/or approval to the Planning Department within 30 days of receipt.

6 **G4 RECORDATION:**

7 This permit shall not be effective until it is recorded at the Imperial County Recorder's
8 Office, and payment of the recordation fee shall be the responsibility of the Permittee. If
9 the Permittee fails to pay the recordation fee within six (6) months from the date of approval,
10 and/or this permit is not recorded within 180 days from the date of approval, this permit
11 shall be deemed null and void, without notice having to be provided to Permittee. Permittee
may request a written extension by filing such a request with the Planning Director at least
30 days prior to the original 180 day expiration. The Director may approve an extension for
a period not to exceed 180 days. An extension may not be granted if the request for an
extension is filed after the expiration date.

12 **G5 COMPLIANCE/REVOCAION:**

13 Upon the determination by the Planning and Development Services Department, (if
14 necessary upon consultation with other Departments or Agency(ies)) that the project is or
15 may not be in full compliance with any one or all of the conditions of this Conditional Use
16 Permit, or upon the finding that the project is creating a nuisance as defined by law, the
17 PERMIT and the noted violation(s) shall be brought immediately to the attention of the
18 appropriate enforcement agency or to the Planning Commission for hearing to consider
19 appropriate response including but not limited to the revocation of the CUP or to consider
possible amendments to the CUP. The hearing before the Planning Commission shall be
held upon due notice having been provided to the Permittee and to the public in accordance
with established ordinance/policy. In the event the action by the County is necessitated by
the actions or lack thereof of a subsidiary user of the tower, all action by the County shall
be taken against the permittee as if the permittee had or was causing the violation. The
County shall not be obligated to deal with any subsidiary user of the facility.

20 **G6 PROVISION TO RUN WITH LAND:**

21 The provisions of this project are to run with the land/project and shall bind the current and
22 future owner(s) successor(s) of interest, assignee(s) and/or transferee(s) of said project.
23 Permittee shall not without prior notification to the Planning and Development Services
24 Department assign, sell, or transfer, or grant control of project or any right or privilege
therein. The Permittee shall provide a minimum of 60 days written notice prior to such
proposed transfer becoming effective. The permitted use identified herein is limited for use
upon this parcel described herein and may not be transferred to another parcel. This shall
likewise be applicable if the transfer is between the primary and a subsidiary user.

25 **G7 RIGHT OF ENTRY:**

26 The County reserves the right to enter the premises to make the appropriate inspection(s)
27 and to determine if the condition(s) of this permit are complied with. Access to authorized
28 enforcement agency personnel shall not be denied, by the landowner, the permittee or a
subsidiary user. The County will contact the person designated by the Permittee to request

1 access to the facility. The request shall be approved within (72) seventy-two hours after
2 request.

3 **G8 TIME LIMIT:**

4 Unless otherwise specified within the project specific conditions this project shall be limited
5 to a maximum of (10) ten years from the recordation date of the CUP. The Conditional Use
6 Permit may be extended for a single (5) five-year period by the Imperial County Planning &
7 Development Services Director. The CUP may be revoked or the extension may not be
8 granted if the project is in violation of any one or all of the conditions or if there is a history
9 of non-compliance with the project conditions.

10 **G9 DEFINITIONS:**

11 In the event of a dispute the meaning(s) or the intent of any word(s) phrase(s) and/or
12 conditions or sections herein shall be determined by the Planning Commission of the
13 County of Imperial. Their determination shall be final unless an appeal is made to the Board
14 of Supervisors within the required time. In this permit the term Permittee may also apply to
15 any other facility user whether specified by name herein or not. To the extent that this tower
16 may be used by more than one service provider other than the applicant (permittee), all of
17 the conditions of this permit shall be equally applicable to the other "user(s)" as if they were
18 the "permittee".

19 **G10 SPECIFICITY:**

20 The issuance of this permit does not authorize the Permittee to construct or operate this
21 project in violation of any state, federal, local law nor beyond the specified boundaries of
22 the project as shown the application/project description/permit, nor shall this permit allow
23 any accessory or ancillary use not specified herein. This permit does not provide any
24 prescriptive right or use to the Permittee for future addition and/or modification to this
25 project. The site specific use authorized by this permit is listed under the SITE SPECIFIC
26 ("S") conditions, and only the use or uses listed shall be deemed as approved by this permit.
27 The Permittee's application and or any support documents supplied by Permittee as part
28 of the application shall not be used to determine allowed use(s).

29 **G11 HEALTH HAZARD:**

30 If the County Health Officer determines that a significant health hazard exists to the public,
31 the County Health Officer may require appropriate measures and the Permittee shall
32 implement such measures to mitigate the health hazard. If the hazard to the public is
33 determined to be imminent, such measures may be imposed immediately and may include
34 temporary suspension of the subject operations. However, within 45 days of any such
35 suspension of operations, the measures imposed by the County Health Officer must be
36 submitted to the Planning Commission for review and approval. Nothing shall prohibit
37 Permittee from requesting a special Planning Commission meeting provided Permittee
38 bears all costs.

39 **G12 REPORT(S):**

40 Permittee shall file an annual report with the Planning and Development Services
41 Department to show that Permittee is in full compliance with this Conditional Use Permit.
42 The report shall be filed within sixty (60) days from the first day of the Calendar year, and
43 shall include at a minimum, the total number of "users" on the tower, any problems
44 encountered during the previous year, any reported frequency interference complaints, the
45 name & phone number of the responsible person whom to contact, and a checklist to show
46 the status of each condition herein. It shall be the responsibility of the Permittee to provide

1 all reports and to include the information about other users. The County may request
2 information at any time from Permittee or other users if applicable, however it shall be the
3 responsibility of the permittee to assure the County that such information is received.

4 **G13 RESPONSIBLE AGENT:**

5 Permittee shall maintain on file with the Planning and Development Services Department
6 the name and phone number of the responsible agent for the site. A backup name shall
7 also be provided, and a phone number for 24-hour emergency contact shall also be on file.
8 If there are other users, the same information (as applicable) required from the Permittee
9 shall also be made available to the County from such other users.

10 **G14 INDEMNIFICATION:**

11 At no cost to the County, Permittee and each and every subsidiary user, shall indemnify,
12 and hold harmless the County, the Board of Supervisors and all officers and agents of the
13 County against any and all claims, actions and liabilities arising out of the permitting,
14 construction and/or operation of the project. This indemnity agreement shall be on file with
15 the Planning and Development Services Department prior to recordation of this CUP.
16 Failure to have the agreement on file within 60 days from the date of approval by the
17 Planning Commission shall terminate the approval of this CUP. If the tower is subject to
18 "multiple" use by anyone other than the Permittee, each such operator, or facility, or
19 individual, person or corporation shall have on file with the County Planning and
20 Development Services Department an indemnification agreement identical to that of the
21 Permittee.

22 **G15 CHANGE OF OWNER/OPERATOR:**

23 In the event the ownership of the site or the operation of the site transfers from the current
24 Permittee to a new successor Permittee, the successor Permittee shall be bound by all
25 terms and conditions of this permit as if said successor was the original Permittee. Current
26 Permittee shall inform the County Planning and Development Services Department in
27 writing at least 60 days prior to any such transfer. Failure of a notice of change of ownership
28 or change of operator shall be grounds for the immediate revocation of the CUP. In the
event of a change, the new Owner/Operator shall file with the Department, via certified mail,
a letter stating that they are fully aware of all conditions and acknowledge that they will
adhere to all. If this permit or any subservient or associated permit requires financial surety,
the transfer of this permit shall not be effective until the new Permittee has requisite surety
on file. Furthermore existing surety shall not be released until replacement surety is
accepted by County. Failure to provide timely notice of transfer by Permittee shall forfeit
current surety.

In the event this is a multi-use tower facility, the written approval from any "user" of the
tower shall be provided to the County in addition to the above.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

G16 COMPLIANCE WITH ORDINANCE:

Permittee is aware of, has been provided a copy of and has agreed to be bound by and maintain compliance with the "Communications Ordinance", being Title 9 Division 24 of the County's codified ordinances.

(TOTAL "G" CONDITIONS are 16)

This space intentionally left blank.

1 **Site Specific Conditions:**

2

3 **S1 PROJECT DESCRIPTION:**

4 This permit authorizes the Permittee to construct and operate a ground-mounted
5 monopole, 40-foot above ground level, "AGL", including therewith the necessary ancillary
6 antenna, waveguide ladder and support posts, and equipment. The project site where the
7 monopole will be located will be fully enclosed by an existing chain link fence, and the area
8 of work will be approximately 500 square feet at the rear of the property. The proposed
9 antenna shall project no more than 48 inches from the centerline of the monopole and will
be either white or grey in color. The monopole is not designed to allow for co-location and
is intended to extend ethernet service to the US DOD SOF Desert Training Facility,
provided the conditions stated herein are followed.

10 **S2 ACCESS TO SITE:**

11 Access to the site shall be as described in the application and as shown on the assessors
12 plat map, and/or as approved by or through an encroachment permit.

13 **S3 HOURS OF OPERATION:**

14 Permittee shall be allowed to operate the site 24 hours per day, seven days per week.

15 **S4 ANCILLARY USES & ADDITIONAL LAND USE PERMITS:**

16 This permit authorizes the Permittee to operate the site as described under Specific
17 Condition S1 with no additional ancillary facilities or uses. This permit shall be considered
18 the primary permit for this site, and if additional Conditional Use Permit(s) are secured for
this site, they shall be subservient to this permit at all times.

19 **S5 SUSPENSION OF OPERATIONS:**

20 If operation of the communications facility ceases for a period of twenty-four (24)
21 consecutive months, the Permittee shall remove the communications tower, all related
22 equipment, and all structures and buildings within 6 months. Permittee may request in
writing to the Planning Director a one-time extension; such extension shall be limited to a
maximum of one year.

23 **S6 ENFORCEMENT ACTION:**

24 County officials responsible for monitoring and/or enforcing the provisions of this permit
25 shall issue a notice requiring abatement of a violation of its terms within a reasonable time
26 as set by ordinance or County policy. As an example, responsible County officials may
27 issue a citation and/or cease-and-desist order for repeated violation until such violations
are abated. Under specific violations, the County may order the facility to cease operation
until it can or will be operated in full compliance.

1 In the event there is enforcement action taken by the County it shall at all times be against
2 the Permittee, even if another party using the tower causes the violation. It shall be the
3 responsibility of Permittee to assure that the tower is operated in compliance with all terms
and conditions of the CUP.

4 **S7 LIGHT & GLARE:**

5 Permittee is allowed to have security as well as operational lighting. Said lighting shall be
6 shielded and direct to on site areas to minimize off site interference from unacceptable
levels of light or glare.

7 **S8 CONFLICTING PERMIT CONDITIONS:**

8 In the event that there is a conflict between the condition of this permit and any other permit,
9 the most stringent condition shall govern.

10 **S9 MINOR ADMINISTRATIVE MODIFICATION:**

11 The Planning and Development Services Director shall have the authority to make
12 interpretations, issue administrative decisions and provide directions that while not
13 modifying the intent of any condition will allow for problem resolution at an administrative
14 level. Both Director and/or Permittee have the right to defer such issues to the Planning
Commission. However, in no event shall any decision regarding this permit be brought to
the Board of Supervisors without first having been brought to the Commission.

15 **S10 LATEST CODES GOVERN:**

16 All on site structures shall be designed and built to meet the latest edition of the applicable
17 codes. In the event the tower is altered, added to, or modified to accommodate additional
18 users, additional antennas or other structural modifications from those originally approved
19 by County, Permittee shall provide revised structural drawings and calculations to the
Building Inspection Division prior to such modifications being made.

20 **S11 COMMUNICATION FREQUENCY:**

21 Transmission frequency, amount of radiated power, and antennae characteristics shall
22 comply with requirements by the Federal Aviation Authority (FAA), Federal
Communications Commission (FCC), Planning Department and other applicable agencies.

23 **S12 FREQUENCY COORDINATION:**

24 The operation of the project shall not cause interference with transmission or reception of
25 signals or other communication facilities. Failure to comply with this condition shall result
26 in suspension or revocation of the Conditional Use Permit.

27 **S13 TOWER EMERGENCY INFORMATION:**

28 Permittee shall file (with the County) a Tower Site Information sheet. The permittee shall
update this information yearly.

1 **S14 RESTORATION SURETY:**

2 (a) To ensure that such restoration is completed, Permittee shall provide security that is in
3 conformance with the County's Financial Assurance Guideline, is acceptable to the Office
4 of County Counsel, and in an amount no less than \$25,000. Said security shall cover
5 Permittee, as well as any co-locators, users, or other subleases located at the site.

6 (b) The amount of security may be administratively increased by the Planning Department
7 of the Planning Commission, upon a finding that the characteristics of the site warrants
8 additional security. The Security must be filed with the County within six (6) months of the
9 approval of this CUP, and/or prior to recordation, whichever comes first.

10 (c) The security shall remain in effect until the project has been completely removed, and
11 the site has been fully restored to its undeveloped condition. In the event there is a history
12 of noncompliance with the conditions of this CUP, or any other applicable federal, State or
13 local law, regulation, rule, policy or procedure, the minimum amount of required security
14 may be administratively increased by the Planning Department of Planning Commission to
15 \$ 35,000.

16 **S-15 AIR POLLUTION CONTROL DISTRICTⁱ**

17 Construction activities on the site must adhere to the Air District's Regulation VIII for the
18 control of fugitive dust emissions, including the submittal of a construction notification to
19 the Air District 10 days prior to any earthmoving activities. The Air District requests a draft
20 copy of the CUP prior to recording

21 **S-16 ENCROACHMENT PERMIT:**

22 Permittee shall obtain, as necessary all encroachment permits, or other special traffic safety
23 permits from the Department of Public Works and/or CALTRANS.

24 **S-17 IMPERIAL IRRIGATION DISTRICTⁱⁱ**

- 25 1. To request electrical service for the approved communication tower, the applicant
26 should be advised to contact Ignacio Romo, IID Customer Project Development
27 Planner, at (760) 482-3426 or e-mail Mr. Romo at igromo@iid.com to initiate the
28 customer service application process. In addition to submitting a formal application
(available for download at the district website
<http://www.iid.com/home/showdocument?id=12923>, the applicant will be required
submit a complete set of approved plans by the County of Imperial, electrical plans,
panel location, voltage requirement, electrical panel schedules, an AutoCAD file
of the site plan, construction schedule, and the applicable fees, permits,
easements and environmental compliance documentation pertaining to the
provision of electrical service to the project. The applicants shall be responsible for
all costs and mitigation measures related to providing electrical service to the
project.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28
2. Distribution-rated electrical service is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
 3. The applicant will need to abide by the following IID electrical tower service guidelines:
 - a. IID will allow only one metering point per site. If more than one meter is requested, the customer must utilize a multi-meter pack.
 - b. For single-phase service from a pole-mounted transformer the total service capacity shall not exceed 600 amps (e.g. six (6) 100 amp panels or three (3) 200 amp panels). Maximum transformer size is a 100kVA with a secondary voltage of 120/240V single phase.
 - c. For single-phase service from a pad-mounted transformer, the total service capacity shall not exceed 800 amps. Maximum transformer size is a 167kVA, 120/240V.
 - d. Services exceeding 800 amps of total capacity must be served from a three-phase pad-mounted transformer rated at 120/208V. Please note that load must be balanced across the phases.
 4. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). The IID encroachment permit application and instructions are available at <https://www.iid.com/about-iid/department-directory/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
 5. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drain, 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 such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

S-18 Minor Alteration to Land:

The property where the monopole is proposed is comprised of the West 50 feet of three (3) separate lots. A lot line adjustment or merger is required to correct this discrepancy.

(TOTAL "S" CONDITIONS are 18)

- 1 Air Pollution Control District Comment Letters dated 04/12/2021 & 09/28/2021
 - 2 Imperial Irrigation District Comment Letter dated 04/21/2021
 - 3 Imperial County Public Works Letter dated 11/02/2021
-

This space intentionally left blank.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOW THEREFORE, County hereby issues Conditional Use Permit #21-0009 and Permittee hereby accepts such permit upon the terms and conditions set forth herein:

IN WITNESS THEREOF, the parties hereto have executed this Agreement the day and year first written.

PERMITTEE

AT&T California d.b.a. Pacific Bell

Date

COUNTY OF IMPERIAL, a political subdivision of the STATE OF CALIFORNIA

James A. Minnick, Director of
Planning & Development Services

Date

1 **PERMITTEE NOTARIZATION**

2 A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to
3 which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

4 STATE OF CALIFORNIA

5 COUNTY OF _____ } S.S.

6
7 On _____ before me, _____
8 a Notary Public in and for said County and State, personally appeared
9 _____, who proved to on the basis
10 of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within
11 instrument and acknowledged to me that he/she/they executed the same in his/her/their
12 authorized capacity(ies), and that by his/her/their signature(s) on the instrument the
13 person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

14 I certify under PENALTY OF PERJURY under the laws of the State of California that the
15 foregoing paragraph is true and correct.

16 WITNESS my hand and official seal

17 Signature _____

18 ATTENTION NOTARY: Although the information requested below is OPTIONAL, it could
19 prevent fraudulent attachment of this certificate to unauthorized document.

20 Title or Type of Document _____

21 Number of Pages _____ Date of Document _____

22 Signer(s) Other Than Named Above _____

23 Dated _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **COUNTY NOTARIZATION**

2 A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to
3 which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

4 STATE OF CALIFORNIA

5 COUNTY OF IMPERIAL} S.S.

6 On _____ before _____ me,
7 _____ a Notary Public in and for said County and State,
8 personally appeared _____, who
9 proved to me on the basis of satisfactory evidence to be the person(s) whose name(s)
10 is/are subscribed to the within instrument and acknowledged to me that he/she/they
11 executed the same in his/her/their authorized capacity(ies), and that by his/her/their
12 signature(s) on the instrument the person(s), or the entity upon behalf of which the
13 person(s) acted, executed the instrument.

11 I certify under PENALTY OF PERJURY under the laws of the State of California that the
12 foregoing paragraph is true and correct.

13 WITNESS my hand and official seal

14 Signature _____

15
16 ATTENTION NOTARY: Although the information requested below is OPTIONAL, it
17 could prevent fraudulent attachment of this certificate to unauthorized document.
18 _____

18 Title or Type of Document _____
19 Number of Pages _____ Date of Document _____
20 Signer(s) Other Than Named Above _____
21
22
23

**Attachment F: Environmental
Evaluation Committee Package
IS #21-0012**

PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION
COMMITTEE

AGENDA DATE: September 9, 2021

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME: 1:30 PM / No. 1

PROJECT TYPE: AT&T California d.b.a. Pacific Bell CUP #21-0009/IS #21-0012 SUPERVISOR DIST #4

LOCATION: 313 E. Main St., APN: 021-073-007-000
Niland PARCEL SIZE: 7,750 Sq.Ft.

GENERAL PLAN (existing) Niland Urban Area Plan (Light Industry) GENERAL PLAN (proposed) N/A

ZONE (existing) M-1 (Light Industrial) ZONE (proposed) N/A

GENERAL PLAN FINDINGS CONSISTENT INCONSISTENT MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

APPROVED DENIED OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

APPROVED DENIED OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 09/09/2021
INITIAL STUDY: #21-0012

NEGATIVE DECLARATION MITIGATED NEGATIVE DECLARATION EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED
AG. COMMISSIONER	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
APCD	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
DEH/EHS	<input type="checkbox"/>	NONE	<input checked="" type="checkbox"/>	ATTACHED
FIRE/OES	<input checked="" type="checkbox"/>	NONE	<input type="checkbox"/>	ATTACHED

OTHER: Quechan Historic Preservation, Imperial Irrigation District, IVECA

REQUESTED ACTION:

(See Attached)

- NEGATIVE DECLARATION**
 MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit #21-0009
Initial Study #21-0012
AT&T California d.b.a. Pacific Bell



Prepared By:

COUNTY OF IMPERIAL
Planning & Development Services Department
801 Main Street
El Centro, CA 92243
(442) 265-1736
www.icpds.com

September 2021

EEC ORIGINAL PKG

TABLE OF CONTENTS

	<u>PAGE</u>
<u>SECTION 1</u>	
I. INTRODUCTION	3
<u>SECTION 2</u>	
II. ENVIRONMENTAL CHECKLIST	8
PROJECT SUMMARY	11
ENVIRONMENTAL ANALYSIS	14
I. AESTHETICS	156
II. AGRICULTURE AND FOREST RESOURCES	155
III. AIR QUALITY	166
IV. BIOLOGICAL RESOURCES	177
V. CULTURAL RESOURCES	188
VI. ENERGY	188
VII. GEOLOGY AND SOILS	188
VIII. GREENHOUSE GAS EMISSION	20
IX. HAZARDS AND HAZARDOUS MATERIALS	20
X. HYDROLOGY AND WATER QUALITY	21
XI. LAND USE AND PLANNING	222
XII. MINERAL RESOURCES	222
XIII. NOISE	233
XIV. POPULATION AND HOUSING	233
XV. PUBLIC SERVICES	233
XVI. RECREATION	244
XVII. TRANSPORTATION	244
XVIII. TRIBAL CULTURAL RESOURCES	255
XIX. UTILITIES AND SERVICE SYSTEMS	255
XX. WILDFIRE	266
<u>SECTION 3</u>	
III. MANDATORY FINDINGS OF SIGNIFICANCE	28
IV. PERSONS AND ORGANIZATIONS CONSULTED	29
V. REFERENCES	30
VI. NEGATIVE DECLARATION - COUNTY OF IMPERIAL	31
27 FINDINGS	32
<u>SECTION 4</u>	
VIII. RESPONSE TO COMMENTS (IF ANY)	33
IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP) (IF ANY)	34

FEC ORIGINAL PKG

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 #21-0009, where the intent of the project is to build and maintain a 40-foot monopole, antenna, and waveguide in the rear yard to extend services to the United States Department of Defense Special Operations Forces Desert Warfare Training Facility. (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 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

FEC ORIGINAL PKG

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 significant impact, potentially 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.

FEC ORIGINAL PKG

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. **Less Than Significant With 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:

FEC ORIGINAL PKG

"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 State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
 - The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.

II. *Environmental Checklist*

1. **Project Title:** Conditional Use Permit #21-0009 for AT&T California d.b.a. Pacific Bell/
Initial Study #21-0012
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** Jeanine Ramos, Planner I, (442) 265-1736, ext. 1750
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** jeanineramos@co.imperial.ca.us
6. **Project location:** The project site is located at 313 E. Main Street, Niland, CA within the townsite of Niland, approximately 7.5 miles north of the Calipatria Municipal Airport. The parcel is identified as Assessor's Parcel Number (APN) 021-073-007-000 and is legally described as the west 50 ft. of Lots 16, 17, and 18, of Block 35, Townsite of Niland.
7. **Project sponsor's name and address:** BJG Architecture & Engineering, 675 W. Moana Lane, Suite 107, Reno, NV 89509
8. **General Plan designation:** Niland Urban Area Plan (Light Industry)
9. **Zoning:** M-1 (Light Industrial)
10. **Description of project:** The applicant, AT&T CA d.b.a. Pacific Bell., intends to build and operate a 40-foot tall monopole and dish antenna at the rear of the parcel. The purpose of the monopole is to establish a microwave link between the existing AT&T Niland Facility and the new Desert Warfare Training Facility. The training facility is currently under construction at the Chocolate Mountain Air Gunnery Range. The proposed project will also include a foundation slab, waveguide ladder and support posts, and cable entry through existing pipe penetration at the south side of the existing AT&T building. The entire parcel is approximately 7,750 square feet; however, the approximate area of work will be 500 square feet within the rear yard of the parcel. The project site is fully enclosed with an existing chain link fence.
11. **Surrounding land uses and setting:** The project abuts a nonconforming single-family residence to the east that is zoned M-1 (Light Industrial Zone). A vacant lot is directly to the west of the project site that is also zoned M-1 (Light Industrial Zone). The project site abuts Main Street and across this street to the north is an existing RV park, currently zoned R-4 (Mobile Home Park or Subdivision Zone/High Density Residential Zone). Directly to the south is another nonconforming single-family residence that is zoned M-1 (Light Industrial Zone). The project site is occupied by AT&T and currently provides local telephone and Ethernet services to Niland.
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.?**
Native American Heritage Commission (NAHC), Quechan Indian Tribe and Torres-Martinez Indian Tribe were contacted and invited to participate in the Request for Review and Comments as part of the Initial Study review process. An AB52 letter was also sent out to the Quechan Indian Tribe for a 30-day consultation period for review and comment. On April 8, 2021, the Quechan Historic Preservation Office emailed to state they had no comments. No other comments were received.

FEC ORIGINAL PKG

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.

FEC ORIGINAL PKG

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.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Energy
<input type="checkbox"/>	Geology /Soils	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Hazards & Hazardous Materials
<input type="checkbox"/>	Hydrology / Water Quality	<input type="checkbox"/>	Land Use / Planning	<input type="checkbox"/>	Mineral Resources
<input type="checkbox"/>	Noise	<input type="checkbox"/>	Population / Housing	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Recreation	<input type="checkbox"/>	Transportation	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Wildfire	<input type="checkbox"/>	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.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE DE MINIMIS IMPACT FINDING: Yes No

<u>EEC VOTES</u>	<u>YES</u>	<u>NO</u>	<u>ABSENT</u>
PUBLIC WORKS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ENVIRONMENTAL HEALTH SVCS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OFFICE EMERGENCY SERVICES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
APCD	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AG	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SHERIFF DEPARTMENT	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ICPDS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



 Jim Minnick, Director of Planning/EEC Chairman

9-9-2021

 Date:

EEC ORIGINAL PKG

PROJECT SUMMARY

- A. **Project Location:** The project site is located at 313 E. Main Street, Niland, CA within the townsite of Niland, approximately 7.5 miles north of the Calipatria Municipal Airport. The parcel is identified as Assessor's Parcel Number (APN) 021-073-007-000 and is legally described as the west 50 ft. of Lots 16, 17, and 18, of Block 35, Townsite of Niland.
- B. **Project Summary:** The applicant, AT&T CA d.b.a. Pacific Bell, intends to build and maintain a 40-foot tall monopole and dish antenna at the rear of the existing AT&T brick building. The purpose of the monopole is to establish a microwave link between the existing AT&T Niland Facility and the new Desert Warfare Training Facility. The training facility is currently under construction at the Chocolate Mountain Air Gunnery Range. The proposed project will also include a foundation slab, waveguide ladder and support posts, and cable entry through existing pipe penetrations on the south elevation. The monopole will only be used by the training facility, and will not be used for co-locators. The entire parcel is approximately 7,750 square feet, however, the approximate area of work will be 500 square feet within the rear yard of the parcel. The project site is fully enclosed with an existing chain link fence.
- C. **Environmental Setting:** The existing land uses directly east and south of the project consist primarily of nonconforming single-family residences. An RV Park is directly to the north of the project site, and a vacant lot is to the west. The northern portion of the site is occupied by an existing building used by AT&T to provide local telephone and ethernet services to Niland.
- D. **Analysis:** The project site is designated Light Industry, a part of the Niland Urban Area Plan under the Land Use Element of the Imperial County General Plan. The site is zoned "M-1" (Light Industrial Zone) per Zoning Map #11A under the Title 9 Land Use Ordinance. Under the Imperial County Title 9, Division 5, Chapter 15, Section 90515.02 (S), communication towers, including any necessary support equipment, are allowed on an M-1 zone with the approval of a conditional use permit. Based on the goals provided by Division 24 the Communication Ordinance under the Imperial County's Land Use Ordinance, where it is the County's intent to, "enhance the ability of the providers of telecommunications services to the community quickly, effectively, and efficiently". The placement of the monopole will meet this objective by allowing for AT&T to improve services to the new desert warfare training facility currently under construction by the U.S. Department of Defense.
- E. **General Plan Consistency:** As previously mentioned, the project area is designated Light Industry, as a part of the Niland Urban Area Plan and is found to be consistent with the Imperial County General Plan. The proposed project is not expected to conflict with the County's General Plan.

FEC ORIGINAL PKG

Exhibit "A" Vicinity Map



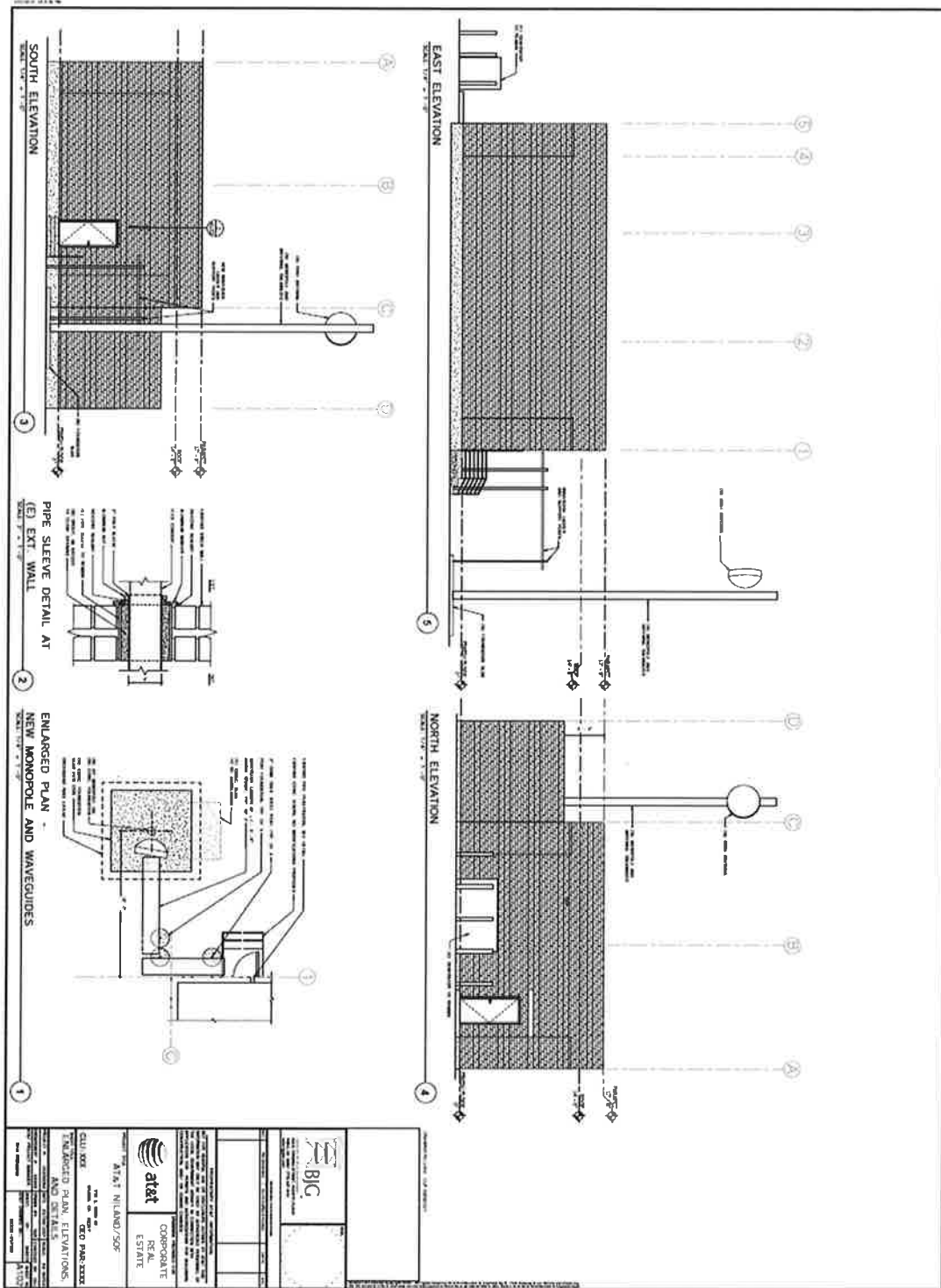
**AT&T CALIFORNIA D.B.A. PACIFIC
TELEPHONE & TELEGRAPH CO.
APN 021-073-007-000**

- PROJECT LOCATION
- TOWER LOCATION



FEC ORIGINAL PKG

Exhibit "B" Site Plan



FEC ORIGINAL PKG

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

I. **AESTHETICS**

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

- a) Have a substantial adverse effect on a scenic vista or scenic highway?
a) The project is approximately one-half mile to the east of Highway 111, which is designated a scenic highway according to Imperial County General Plan's Circulation & Scenic Highways Element. However, the only area on Highway 111 that is eligible for future Scenic Highway Designation is from Bombay Beach to the northern County line. This project is not located on or near the designated area. Therefore, less than significant impacts are expected.

- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?
b) There are no scenic resources such as trees, rock outcroppings or historic buildings surrounding the project site; therefore, no impacts are expected.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
c) The proposed project is in an urbanized area and consists of building a 40-foot tall monopole with a dish antenna. While the proposed monopole will be visible to public, it will be situated on an existing light industrial site zoned M-1. The proposed project is located within an existing urban area and will not conflict with applicable zoning and other regulations governing scenic quality; therefore, less than significant impacts are expected.

- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?
d) Title 9, Division 24, requires all towers to be lit with approved lighting as required per the Federal Aviation Administration (FAA) and the Imperial County Airport Land Use Commission standards¹, this includes day and nighttime lighting, which the US Fish and Wildlife Services states that, "security lighting on on-ground facilities, equipment, and infrastructures should be motion or heat sensitive, down-shielded and of a minimum intensity to reduce nighttime bird attraction."² Additionally, all sources of lighting that may be used, including security and operational lighting, are required by State Codes and County Ordinances to be shielded or directed onsite to minimize offsite impacts. Compliance with said codes and ordinances would bring the project's impacts to less than significant levels.

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) According to the California Department of Conservation Farmland Mapping and Monitoring Program (2016)³, the project site's Farmland Type is designated Urban and Built-Up Land. As it is not shown on the map as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), no impacts are expected.

¹ Airport Land Use Compatibility Plan <http://www.icpds.com/CMS/Media/ALUC-Compatibility-Plan-1996-Part-I.pdf>
² Fish and Wildlife Department's Service Guidance regarding Communication Towers
³ <https://maps.conservation.ca.gov/DLRP/CIFF/>

FEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? b) The existing zoning and land use designation of the property are related to light industrial uses, which do not conflict with any zoning for agricultural use. In addition, the project site is not under the Williamson Act contract; therefore no impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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) The proposed project is located within an existing built-up area and will not conflict with existing zoning or cause rezoning of forest land, timberland or timberland zoned Timberland Production. Therefore, no impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? d) As previously stated, the proposed project is located within an existing built-up area and will not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impacts would occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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) The implementation of the project would not result in changes to the environment, which could result in the conversion of farmland to non-agricultural use, since the project is not a part of a site designated as Farmland. Therefore, this would not cause an impact or conversion from forestland to non-forest use and no impacts are expected to occur.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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) Air quality within Imperial County is regulated by the Imperial County Air Pollution Control District (ICAPCD). The project would be required to conform to the requirements of the ICAPCD and adhere to the Air District's Regulation VIII for the control of fugitive dust emissions, including the submittal of a Construction Dust Control Plan to the Air District 10 days prior to the start of construction. Should either the construction or the operation phase of the project include the use of a diesel generator above 50 brake horsepower the applicants will also need to contact the Permitting & Engineering Division of the ICAPCD to determine permitting requirements. Less than significant impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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) The vehicle emissions and pollutants from construction activities would be within APCD's thresholds due to the area that is to be disturbed, and would be temporary; therefore, less than significant impacts are expected in regards to an increase of any criteria pollutant. In addition, the design and construction of the project shall be done in compliance with all applicable County and APCD requirements to assure that less than significant impacts occur. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Expose sensitive receptors to substantial pollutant concentrations?
c) The pollutants that could possibly affect the nearest sensitive receptors include diesel exhaust and volatile organic compound (VOC) emissions, which are typically related to construction trucks and machinery, although the amount of these emissions would be very low and would be expected to disperse rapidly. The nearest sensitive receptors include tenants of the RV Park across the street from the project site and the surrounding single-family residences, but the impacts would be temporary and would be lessened by showing compliance with APCD's rules and regulations regarding construction pollutants. For those reasons, less than significant impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)?
d) As previously mentioned, diesel exhaust and volatile organic compound (VOC), are low emissions that are expected to be released during the construction activities and would be dispersed rapidly from the project site. The operation of the | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

proposed project is not expected to result in other emissions that would adversely affect a substantial number of people. Compliance with all County and APCD's regulations would bring the project's impacts to less than significant levels.

IV. **BIOLOGICAL RESOURCES** *Would the project:*

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| <p>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?</p> <p>a) The proposed project site is not located within a designated sensitive habitat according to The Imperial County General Plan's Conservation and Open Space Element⁴ Figure 1 "Sensitive Habitats Map". The project is also not within an agency-designated habitat area, but is within the "Flat-Tailed Horned Lizard Species Distribution Model" according to the Imperial County General Plan's Conservation and Open Space Element, Figure 2⁵. However, the project site is currently disturbed, developed with the AT&T Niland Facility providing local telephone and Ethernet services; therefore, less than significant impacts are expected.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> <p>b) According to the Imperial County General Plan's Conservation and Open Space Element, the project site is not located within or near a sensitive or riparian habitat, nor within a sensitive natural community. Less than significant impacts are expected to occur regarding adverse effects on the above habitats.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> <p>c) The proposed location of the project is within an urban area that is currently in use by AT&T and the only occasion that water would be required would be during construction. No marsh, vernal pool or coastal wetlands are in the area, so no impacts can be expected.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>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?</p> <p>d) The project site is not located on or near a large body of water and no fish or wildlife species would be affected by the proposed project. In addition, it would not impede the use of native wildlife nursery sites since there are none immediately surrounding the project site; therefore, less than significant impacts are expected.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?</p> <p>e) Compliance with all of the County's regulations and requirements regarding local policies and/or ordinances protecting biological resources would cause the project's impacts to be less than significant, although there are no tree preservation policies applicable to the project site area.</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>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?</p> <p>f) Imperial County does not have a Habitat Conservation Plan (HCP). Thus, with regards to the HCP, no impacts would</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

⁴ IC General Plan Conservation and Open Space Element Figure 1 <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>

⁵ <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

occur. Some lands in the County under the jurisdiction of the Bureau of Land Management (BLM) are covered by the California Desert Conservation Area (CDCA) Plan which includes Areas of Critical Environmental Concern (ACEC). The project site is not within or immediately adjacent to an ACEC of the CDCA. Therefore, less than significant impacts are anticipated.

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) As depicted on Imperial County's General Plan Figure 6, <i>Conversation and Open Space Element</i>⁶, the project site was not identified as containing a historic resource. The project is also located within a parcel that is currently in use by AT&T and no history of any historical resources were previously found on this site. Accordingly, the project would not appear to impact a historical resource as defined by CEQA. Less than significant impacts are expected. | | | | |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) The project site is not located within an archeological site of significance as shown in the Conservation and Open Space Element. Less than significant impacts are expected. | | | | |
| c) Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) There are no known cemeteries on or surrounding the project site. The project site is not known to have been a formal or informal cemetery. Therefore, the proposed project is not expected to disturb any human remains and less than significant impacts are anticipated. | | | | |

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) The proposed project does not appear to result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources during the project. Less than significant impacts are anticipated. | | | | |
| b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (b) The proposed project does not appear to conflict with or obstruct a state or local plan regarding renewable energy or energy efficiency. Less than significant impacts are anticipated. | | | | |

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| a) The proposed project does not appear to directly or indirectly cause potential adverse effects, including risk of loss, injury, or death. The project shall comply with the most current California Uniform Building Code and regulations provided by the Imperial County Public Works Department. Adherence with the previously referenced Building Codes, the submittal of a soils report as required by the Building Division within Imperial County Planning Department, and/or any other applicable requirement, would reduce impacts 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 1) The proposed project is not located near any known earthquake fault according to the Fault Activity Map of | | | | |

⁶ <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

California (2015)⁷. Therefore, adherence with the previously referenced Building Codes and/or any other applicable requirement, would reduce impacts to less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 2) Strong Seismic ground shaking?
2) Ground shaking is expected to occur being that the project site is located in the seismically active Imperial Valley, with numerous mapped faults of the San Andreas Fault System traversing the region. The proposed project is not located near a known fault, however, all grading and construction work shall require earthquake resistant construction and would need to comply with the latest edition of the California Building Codes, as well as with all current building codes; therefore, less than significant impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3) Seismic-related ground failure, including liquefaction and seiche/tsunami?
3) The proposed project is not located in a tsunami inundation area per the California Tsunami Inundation Map⁸, additionally; the design and subsequent construction of the proposed communication tower will be subject to the latest California Building Codes. Therefore, adherence to these regulations would bring any seismic-related impacts such as ground failure to less than significant. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4) Landslides?
4) According to the Imperial County General Plan Landslide Activity Map, Figure 2⁹, Seismic and Public Safety Element, the project site does not lie within a landslide activity area and therefore, no impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?
b) The project site has a very low potential for soil erosion due to its flat topography. The ground would be disturbed for grading and construction purposes but would not affect or cause for soil erosion after construction is completed, since the monopole would be unmanned. The project is subject to approval from both the County's Building (ICPDS) and Public Works Departments. The design of the tower and ancillary equipment, as well as its construction and future operation must be made so that any possibility of contamination of soil or topsoil is minimized or eliminated. Getting the approval for the design and construction of the proposed tower from all applicable County agencies would bring the project's impacts to less than significant levels regarding soil. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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) The project site is not known to be located on unstable geological units and/or soil, and the conditions for lateral spreading, subsidence, liquefaction and collapse are not present; therefore, less than significant impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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) The proposed project does not appear to be located on expansive soil as defined in the latest Uniform Building Code, creating substantial risk to life or property. Less than significant impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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) No septic tanks or other alternative wastewater disposal systems are being proposed as part of the application. Less than significant impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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 any unique paleontological resources as the site is an existing built up area. Less than significant impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

⁷ <http://maps.conservation.ca.gov/cgs/fam/>

⁸ <https://www.conservation.ca.gov/cgs/tsunami/maps>

⁹ <http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

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) Other than during the construction phase, the proposed project is not expected to generate greenhouse gas emissions that would have a significant impact. Impacts are expected to be 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 is not expected to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Any grading and construction activities are subject to the Imperial County Air Pollution Control District's recommendations for the reduction of pollutant emissions. Compliance with APCD and all applicable County's requirements would bring the impacts to less than significant levels.

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 does not include any handling of hazardous materials; therefore, less than significant impacts to the public or the environment are anticipated.

- 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) The proposed project does not include any works that would create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazard materials into the environment; therefore, less than significant impacts are anticipated.

- 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) Directly east and south of the project site are nonconforming single family residences, while north of the site is an existing RV Park. However, other than during the construction phase of the project, no hazardous emissions or materials are expected to be generated that would affect these residents and park. Therefore, 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) Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) the DTSC EnviroStor Database¹⁰ to compile and update a list of hazardous waste and substances sites. After review, it was found that the project site was not located under a listed hazardous and substances site; therefore, less than significant impacts are anticipated.

- 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 project site is not located within a runway protected zone or approach/departure zone of a local airport. The Calipatria Municipal Airport is approximately seven and half miles south from the project site, as shown in the Airport Land

¹⁰ EnviroStor Database <http://www.envirostor.dtsc.ca.gov/public/>

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--	--------------------------------------	--	-------------------------------------	----------------

Use Compatibility Plan (Figure 1A)¹¹. Less than significant impacts are anticipated.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

f) The proposed project shall comply with all County requirements and regulations and would not impair or interfere with any applicable emergency plans. The access point to the proposed tower does not interfere with the access points currently in use by the AT&T building and its users. Therefore, no impacts are to be expected.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

g) The proposed project will not expose people or structures either directly or indirectly to a significant risk or loss, injury or death involving wildfire as the site is not located on or near wildlands. Less than significant impacts are expected.

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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

a) The proposed project does not include any water or wastewater for the operation of the monopole other than what will be required for dust suppression when construction occurs, and therefore no violation of any water quality standards would occur. Compliance by the applicant, property owner and monopole user with all local, state and federal laws would bring the project's potential impacts to less than significant levels.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

b) The proposed project would not require the usage of groundwater or would interfere substantially with groundwater recharge, other than when the monopole is under construction. The applicant is proposing to truck in water for construction of the monopole. There are no known water wells (permitted or not) within the project site; therefore, less than significant impacts are anticipated.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

(i) The proposed project will not alter any existing drainage patterns on site, including the alterations of a stream or river, which would result in substantial erosion or siltation on or off-site as it is not located near a stream or river.

According to the Imperial County General Plan Erosion Activity Map, Figure 3¹², Seismic and Public Safety Element, the area is designated low activity. Therefore, less than significant impacts are anticipated.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

(ii) As previously stated, the operation of the proposed monopole does not involve the use of water. Any drainage patterns shall comply with all State and Local codes, including Public Works Department regulations. Adherence to the code would lessen the project's impact to less than significant.

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

(iii) Any Grading and Drainage Study/Plans shall be submitted by the applicant to Imperial County Planning and

¹¹ <http://www.icpds.com/CMS/Media/Airport-Locations.pdf>

¹² <http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf>

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--	--------------------------------------	--	-------------------------------------	----------------

Development Services and Public Works Department. The grading and draining plans would need to be designed as to prevent or avoid contribution to runoff or polluted water or alter stormwater drainage systems in a negative manner. Implementing these plans after approval would cause for less than significant impacts.

(iv) impede or redirect flood flows?

(iv) The project site is located on Zone X, which is "Area of Minimal Flood Hazard" under FEMA Flood Map 06025C0725C; therefore, less than significant impacts are expected.

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

d) According to the California Emergency Management Agency and the Department of Conservation¹³, the project site is not located within a Tsunami Inundation Area for Emergency Planning; therefore, no impacts are expected.

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

e) The proposed project would not require the usage of water for the operation of the monopole or located near a large body of water that would cause an obstruction to the implementation of a water quality control plan or sustainable groundwater management plan. Therefore, less than significant impacts are anticipated.

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

a) Physically divide an established community?

a) The project site would not isolate any established communities. The proposed project site is located within an existing Light Industrial zone with the established AT&T facility on site. The monopole will take up only approximately 500 square feet of the existing 7,750 square feet lot. Therefore, no impacts can be expected.

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

b) Under the Land Use Element of the Imperial County General Plan, the project site is designated as Light Industry in the "Niland Urban Area" and zoned M-1 (Light Industrial). The proposed project would not conflict with the General Plan or Land Use Ordinance, since it is a permitted use with an approved conditional use permit. The project also does not conflict with Title 9, Division 24 and therefore, less than significant impacts are expected.

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) In accordance with the California Department of Conservation- Mineral Land Classification Map¹⁴, the project site is not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region of the residents of the State of California. Less than significant impacts are anticipated.

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) In accordance with the Imperial County General Plan- Conservation and Open Space Element- Figure 8- Existing Mineral Resources¹⁵, the project site is not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the local general plan, specific plan or other land use plans. Less than significant impacts are anticipated.

¹³ Department of Conservation Tsunami Inundation Maps https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/

¹⁴ <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>

¹⁵ <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

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) Noise levels produced during the construction phase of the project would be temporary and within business hours, these levels shall not exceed the threshold established in the Imperial County General Plan "Noise Element" and shall comply with the applicable regulations regarding construction. Adherence to the "Noise Element" standards would bring the impacts to a less than significant level. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b) Generation of excessive groundborne vibration or groundborne noise levels?
b) As previously stated, the temporary noise levels and vibrations that could result from the earthwork and construction activities would have to be maintained within the County's allowed threshold to avoid nuisances regarding excessive groundborne vibration. Adherence to the "Noise Element" standards would bring the impacts to less than significant levels. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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) The project site is not located within a runway protected zone or approach/departure zone of a local airport. The Calipatria Municipal Airport is approximately seven and a half miles south from the site as shown in the Airport Land Use Compatibility Plan (Figure 1A)¹⁶, but is not within its sphere of influence. No impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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 project is located within a light industrial zone, and would not induce a population growth in the area. The approval of the proposed project would improve telecommunication services to the area and to the new desert warfare training facility that is currently under construction by means of a 40-foot monopole and dish antenna; therefore, no impacts are expected. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?
b) Implementation of the project would not displace substantial numbers of existing housing and would not necessitate the construction of replacement housing elsewhere. No impacts are anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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 project will not result in any adverse physical impacts associated with any new or altered governmental facilities or require the need for new or altered governmental facilities. Therefore, less than significant impacts anticipated. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 1) Fire Protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

¹⁶ <http://www.icpds.com/CMS/Media/Airport-Locations.pdf>

Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
--------------------------------------	--	-------------------------------------	----------------

1) The proposed project area is under the service area of the Imperial County Fire Department and will receive adequate fire protection service. The site will not result in the need for new or physically altered fire protection services. Impacts to fire protection facilities would be less than significant.

2) Police Protection?

2) The County Sheriff's office provides police protection to the area. Less than impacts are anticipated due to the proposed project.

3) Schools?

3) The proposed project is not expected to directly or indirectly draw a substantial number of new residents to the region that would generate school-aged students requiring public education. As the project would not cause or contribute a need to construct new or physically altered public school facilities, no impacts are anticipated.

4) Parks?

4) The proposed project would not create a demand for public park facilities and would not result in the need to modify existing or construct new park facilities. Accordingly, implementation of the proposed project would not adversely affect any park facility and no impacts would be anticipated.

5) Other Public Facilities?

5) The proposed project is not expected to result in a demand for other public facilities services. As such, implementation of the proposed project would not adversely affect other public facilities or require the construction of new or modified public facilities. No impacts are anticipated.

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 does not propose any type of residential use or other land use that may generate a population that would increase the use of existing neighborhood and regional parks or other recreational facilities. Accordingly, implementation of the proposed project would not result in the increased use or substantial physical deterioration of an existing neighborhood or regional park. Therefore, no impacts are anticipated.

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 project does not propose to construct any new on or off-site recreational facilities. Additionally, the project would not expand any existing on or off-site recreational facilities. Thus, environmental effects related to the construction or expansion of recreational facilities would not occur with implementation of the proposed project. Therefore, no impacts are anticipated.

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 not expected to conflict with the Imperial County General Plan's Circulation and Scenic Highways Element and/or any applicable plan, ordinance or policy related to the transportation sector. The temporary construction activities and the amount of daily trips to the site from Highway 111, is expected to be below the acceptable threshold by the County; therefore, less than significant impacts are anticipated.

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

b) Section 15064.3 (b) - Criteria for Analyzing Transportation Impacts refers to the amount and distance of automobile travel attributable to a project. With regards to subsection (1) - Land Use Project, the project does not conflict or is inconsistent with this section as it is not a one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor. As the project proposed is for a communications tower, the increase of vehicle miles traveled

EFC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
due to the project compared to existing conditions would not be relevant in this case and therefore, less than significant impacts are expected.				
c) Substantially increases hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) The proposed project does not have any design features that would increase hazards or incompatible uses. Therefore, less than significant impacts are anticipated.				
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) The proposed project will not result in inadequate emergency access; therefore, less than significant impacts are expected.				

XVIII. **TRIBAL CULTURAL RESOURCES**

- a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- a) Assembly Bill 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with California Native American tribe that is traditionally and culturally affiliated with geographic area of the proposed project. Imperial County has consulted with appropriate tribes with the potential for interest in the region. Based on comment provided by the Quechan Historic Preservation Office on April 8, 2021, the project site is not located in an area identified as having the potential for a tribal cultural resource; therefore, less than significant impacts are expected.**
- (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
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- (i) The proposed site was not listed under the California Historical Resources in County of Imperial¹⁷ nor does it appear to be eligible under Public Resources Code Section 21074 or 5020.1 (k); therefore, less than significant impacts are expected.**
- (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.
- | | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
- (ii) There appears to be no history or association in the past with any evidence of historical resources for the property to be either identified as of significance or as candidate for listing in the California Register; therefore, less than significant impacts are expected.**

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

¹⁷ Office of Historic Preservation <http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13>

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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 project is not expected to require or result in the relocation or construction of a new or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facility; therefore less than significant impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? b) The proposed project is not expected to exceed the capacity of the current services provider and no new or expanded entitlements are needed. Therefore; less than significant impacts are anticipated.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 is not expected to cause an impact to the wastewater treatment provider. Less than significant impacts are anticipated.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 will not generate any solid waste that would be in excess of State or local standards or in excess of the capacity of local infrastructure or impair the attainment of solid waste reduction goals. Therefore, a less than significant impact is expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? e) The proposed project does not require a solid waste plan and appears to comply with all federal, state and local statutes and regulations related to solid waste. Adherence to Federal, State and local regulations will bring the project to less than significant impacts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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) The proposed project will not substantially impair any adopted emergency response plan or emergency evacuation plan. A less than significant impact is expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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) The proposed project is in a flat topographical area and not within a wildfire area. Therefore, less than significant impacts are expected.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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) The project is not located within a fire severity zone and will not require infrastructure that may exacerbate fire risk. Therefore, no impacts are anticipated.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EEC ORIGINAL PKG

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) The proposed project will not expose people or structures to significant risks by flooding or landslips as a result of runoff, post-fire slope instability or drainage changes. The proposed project is located on flat terrain and impacts are expected to be less than significant.				

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

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.)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

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, Project Planner
- Jeanine Ramos, Project Planner
- Imperial County Air Pollution Control District
- Ag Commissioner

B. OTHER AGENCIES/ORGANIZATIONS

- Quechan Indian Tribe, Historic Preservation
- IID

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

FEC ORIGINAL PKG

V. REFERENCES

1. Airport Land Use Compatibility Plan <http://www.icpds.com/CMS/Media/ALUC-Compatibility-Plan-1996-Part-1.pdf>
2. Fish and Wildlife Department's Service Guidance regarding Communication Towers
3. <https://maps.conservation.ca.gov/DLRP/CIFF/>
4. IC General Plan Conservation and Open Space Element Figure 1
<http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>
5. <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>
6. <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>
7. <http://maps.conservation.ca.gov/cgs/fam/>
8. <https://www.conservation.ca.gov/cgs/tsunami/maps>
9. <http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf>
10. EnviroStor Database <http://www.envirostor.dtsc.ca.gov/public/>
11. <http://www.icpds.com/CMS/Media/Airport-Locations.pdf>
12. <http://www.icpds.com/CMS/Media/Seismic-and-Public-Safety-Element.pdf>
13. Department of Conservation Tsunami Inundation Maps
https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/
14. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>
15. <http://www.icpds.com/CMS/Media/Conservation-&-Open-Space-Element-2016.pdf>
16. <http://www.icpds.com/CMS/Media/Airport-Locations.pdf>
17. Office of Historic Preservation <http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13>

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 #21-0009 for AT&T California d.b.a. Pacific Bell/Initial Study #21-0012

Project Applicant: AT&T California d.b.a. Pacific Bell

Project Location: The project site is located at 313 E. Main Street, Niland, CA within the townsite of Niland, approximately 7.5 miles north of the Calipatria Municipal Airport. The parcel is identified as Assessor's Parcel Number (APN) 021-073-007-000 and is legally described as the west 50 ft. of Lots 16, 17, and 18, of Block 35, Townsite of Niland.

Description of Project: The applicant, AT&T CA d.b.a. Pacific Bell, intends to build and maintain a 40-foot tall monopole and dish antenna at the rear of the existing AT&T brick building. The purpose of the monopole is to establish a microwave link between the existing AT&T Niland Facility and the new Desert Warfare Training Facility. The training facility is currently under construction at the Chocolate Mountain Air Gunnery Range. The proposed modification will also include a foundation slab, waveguide ladder and support posts, and cable entry through existing pipe penetrations on the south elevation. The entire parcel is approximately 7,800 square feet; however, the approximate area of work will be 500 square feet within the rear end of the parcel. The project site is fully enclosed with an existing chain link fence.

FEC ORIGINAL PKG

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 environmental 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 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.

9-9-2021



Date of Determination

Jim Minnick, Director of Planning & Development Services

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


Applicant Signature

9/17/2021
Date

SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

S:\AllUsers\APN\021\073\007\CUP21-0009\EEC\CUP21-0009 Initial Study.docx

EEC ORIGINAL PKG

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

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

1. PROPERTY OWNER'S NAME AT&T California d.b.a. Pacific Bell	EMAIL ADDRESS dr7282@att.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 2700 Watt Ave. Sacramento, CA	ZIP CODE 95821	PHONE NUMBER (916) 296-0282
3. APPLICANT'S NAME Daniel Redmond	EMAIL ADDRESS dr7282@att.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 7121 Paul Do Mar Way, Elk Grove, CA	ZIP CODE 95757	PHONE NUMBER (916) 296-0282
4. ENGINEER'S NAME Clifford H. Johnson	CA. LICENSE NO. 2602	EMAIL ADDRESS cjohnson@bjginc.com
5. MAILING ADDRESS (Street / P O Box, City, State) 449 S. Virginia St, Fourth Floor, Reno, NV	ZIP CODE 89501	PHONE NUMBER (775) 827-1010
6. ASSESSOR'S PARCEL NO. 021-073-007	SIZE OF PROPERTY (In acres or square foot) 7,800 sq. ft.	ZONING (existing) M-1
7. PROPERTY (site) ADDRESS 315 E. Main St., Niland, CA 92257		
8. GENERAL LOCATION (i.e. city, town, cross street) Near the intersection of E. Main St. and Commercial Ave. in Niland, CA		
9. LEGAL DESCRIPTION West 50 ft. of Lot 16, 17, and 18 of Block 35. Townsite of Niland. Document # 1900I999999		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	The existing AT&T building and property provides local telephone and ethernet services to Niland, CA. The proposed modification will add a monopole, antenna, and waveguide in the rear yard to extend services to the US DOD SOF Desert Warfare Training Facility.
11. DESCRIBE CURRENT USE OF PROPERTY	Telecommunications
12. DESCRIBE PROPOSED SEWER SYSTEM	n/a
13. DESCRIBE PROPOSED WATER SYSTEM	n/a
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	n/a
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? Zero (0), access to site only for maintenance/routine work

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

Daniel Redmond Prof. Network Design Eng. 03/15/2021

Print Name DRW Date

Signature

Print Name

Date

Signature

REQUIRED SUPPORT DOCUMENTS

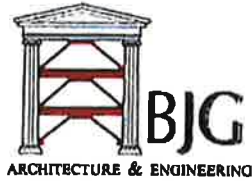
A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

APPLICATION RECEIVED BY: _____	DATE _____	REVIEW / APPROVAL BY OTHER DEPT'S required. <input type="checkbox"/> P. W. <input type="checkbox"/> E. H. S. <input type="checkbox"/> A. P. C. D. <input type="checkbox"/> O. E. S. <input type="checkbox"/> _____ <input type="checkbox"/> _____
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	
APPLICATION REJECTED BY: _____	DATE _____	
TENTATIVE HEARING BY: _____	DATE _____	
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	

CUP #
21-0009

03/17/21 mail 8

EEC ORIGINAL PKG



March 10, 2021

I.C. Planning and Development Services Dept.
801 Main Street
El Centro, CA 92243

Re: Conditional Use Permit – Niland
BJG Project No. 20200064

Dear ICPDS:

We offer the following documents and application for the purpose of obtaining a Conditional Use Permit for new work proposed on parcel number: 021-073-007 in Niland, CA.

The documents included are:

1. Conditional Use Permit application
2. Drawings, two (2) copies each:
 - a. Site Plan and Vicinity
 - b. Enlarged Plan, Elevations, and Details.
3. Photosimulation views of the proposed work described on the plans.
 - a. Four (4) color views, existing vs. proposed

With regard to the fee payment, we ask ICPDS to please call BJB and speak with Cliff Johnson or Monica Stevenson for the payment via credit card. We understand there will be a processing fee of 2.9% added to the fee total.

Thank you for your time and consideration of the Conditional Use Permit application.

Sincerely,

BJG ARCHITECTURE & ENGINEERING

Clifford H. Johnson, SE

Enclosures:
Application
Drawing set, two (2) copies
Photosimulation packet

RECEIVED

MAR 17 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES



February 19, 2021

Imperial County Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Sent via: US mail

RECEIVED

FEB 22 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Re: **Invitation to Comment (Resent with Updated Address)**
Proposed New Tower Build
Site Name: Niland Central Office
315 Main Street, Niland, Imperial County, CA 92577
GE²G Project Number: 311464

Dear Imperial County Planning & Development Services Department,

On behalf of AT&T Geist Engineering and Environmental Group, Inc. (GE²G), has prepared this invitation to comment pursuant to Section 106 of the National Historic Preservation Act. This invitation to comment is about a proposed new tower build. The purpose of this Invitation to Comment is to help determine if your organization or a party you know would like to issue any comments on the proposed facility potential effects to known archaeology resources, traditional cultural resources, and/or historical properties. GE²G is only seeking specific comments about the potential for the TeleSpan Communications project undertaking new tower build to effect historical properties.

Project Description: AT&T proposes to place a new ~40-foot-tall monopole at the rear of the existing AT&T brick building. The tower will be placed south of AT&T brick building within a fenced equipment yard located south of East Main Street between Memphis Avenue and Commercial Avenue. The cabinet electrical and connection equipment will be housed within the existing AT&T brick building which is older than 45-years old. The monopole tower will receive one microwave dish that will be used for data transmission services. The utilities will be connected from the adjacent AT&T brick building. Ground disturbance and excavations will be completed for this project.

Comments:

Comments on this proposed undertaking on effects to historical properties or resources may be referred to GE²G via phone 510-238-8851, email sgeist@geistenvironmental.com or in writing to GE²G, 4200 Park Boulevard #149, Oakland California 94602 (please reference GE²G project number 311464 with any correspondence). Any comments within the next 30-days would be greatly appreciated. If you have any inquiries or would like any additional information, please contact me at (510) 238-8851.

Sincerely,

Mr. Stephen T. Geist, President
GE²G

Topographic Map, Street Map, Aerial Map, Building picture and Drawings

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington

EEC ORIGINAL PKG

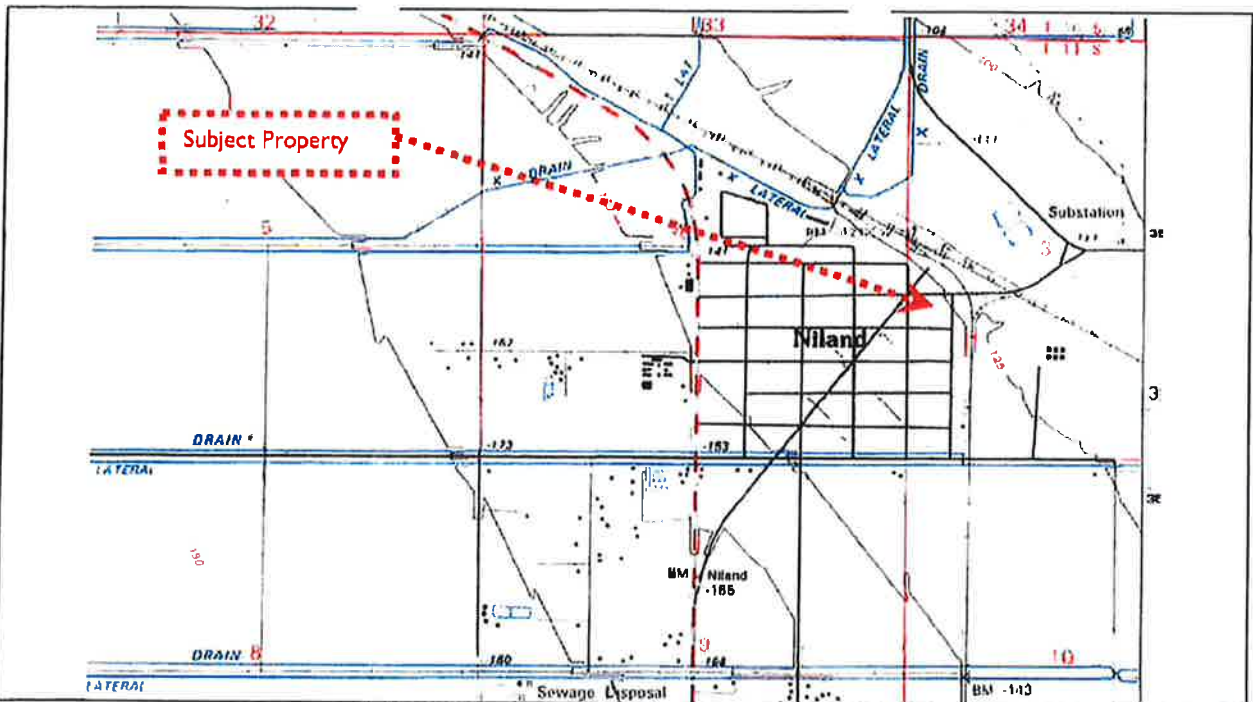


Figure 1: USGS Topographic Map Niland CA - dated 1992
Subject Property: Niland Central Office (source USGS)

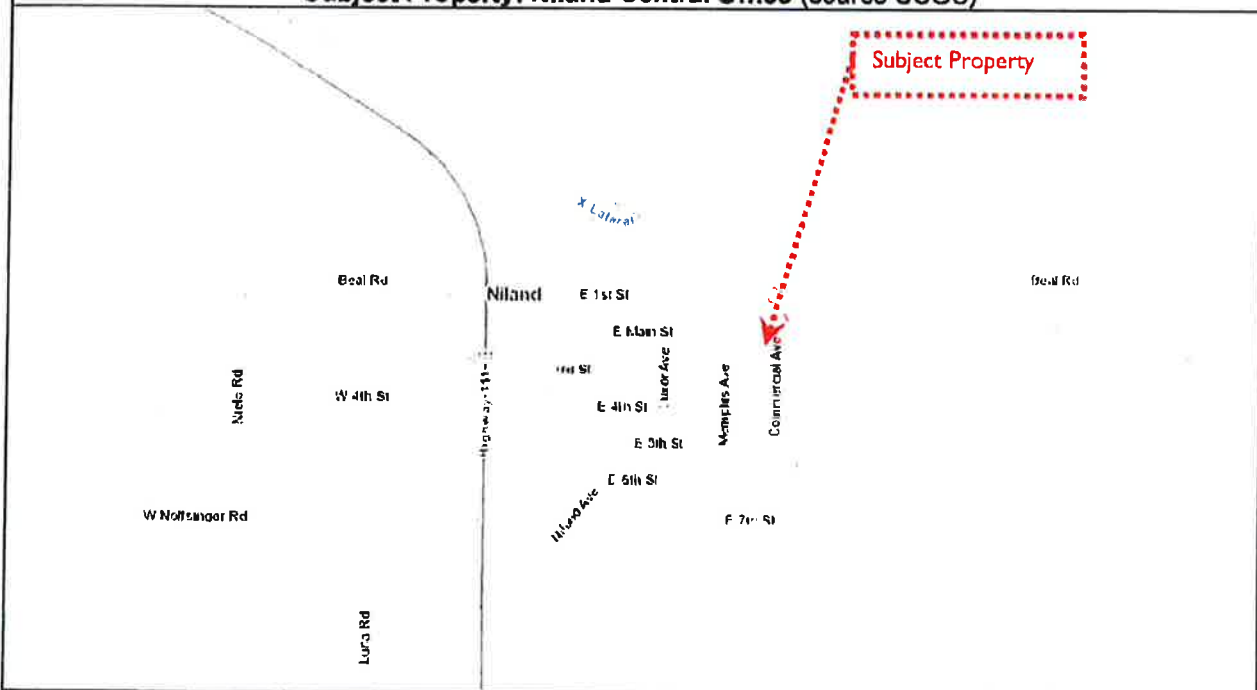


Figure 2: Street Map Subject Property: Niland Central Office (Source USGS)

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
 4200 Park Boulevard #148, Oakland, California 94602
 510.238.8851 (p) / sgeist@ge2a.com
 Field Offices: Arizona, California, Colorado, Oregon, and Washington

EEC ORIGINAL PKG

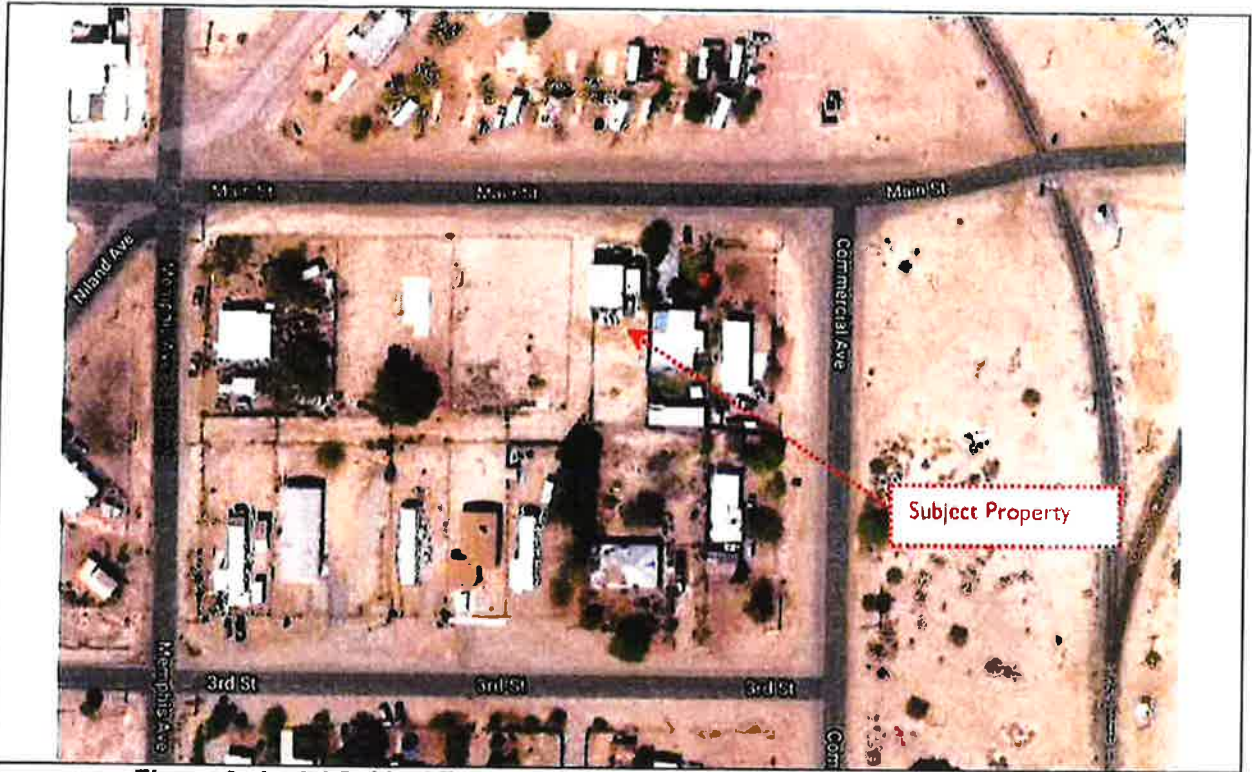


Figure 3: Aerial Subject Property: Niland Central Office (Source Google Maps)

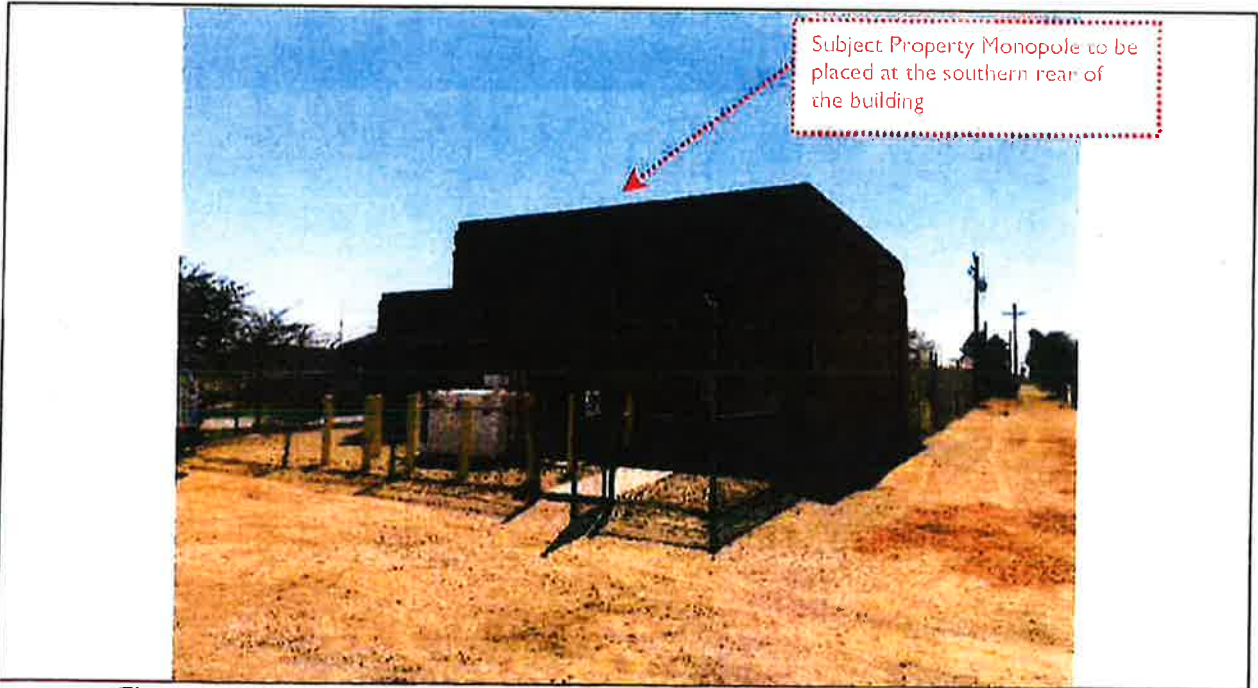
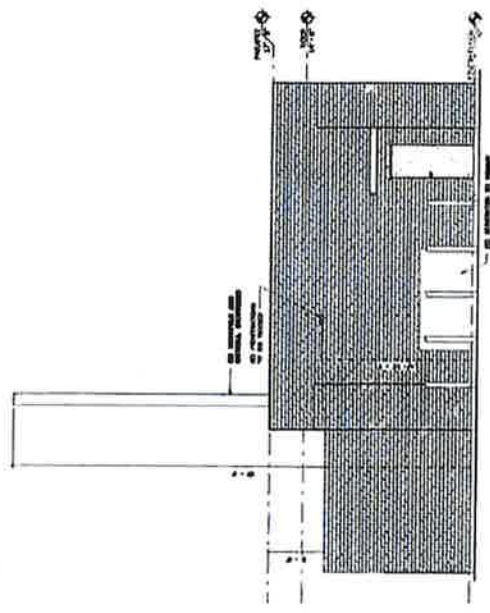


Figure 4: Picture of Subject Property Host Front North Elevation of the Building: Niland Central Office (Source GE²G)

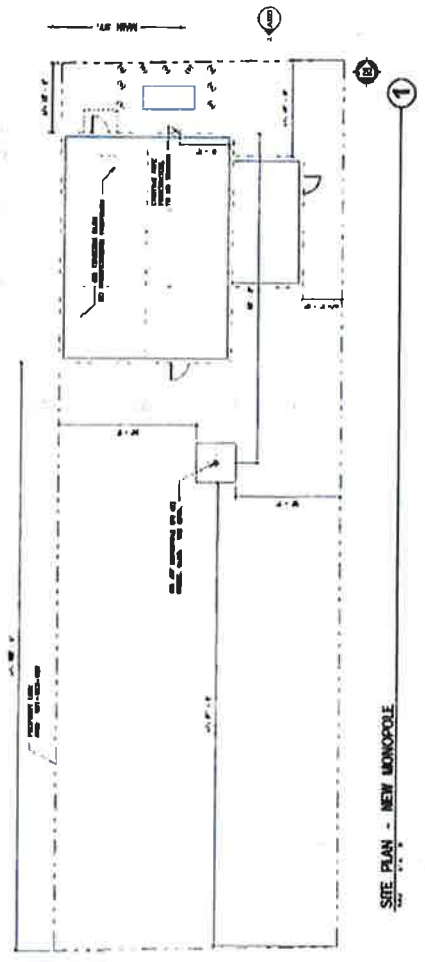
GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington

EEC ORIGINAL PKG

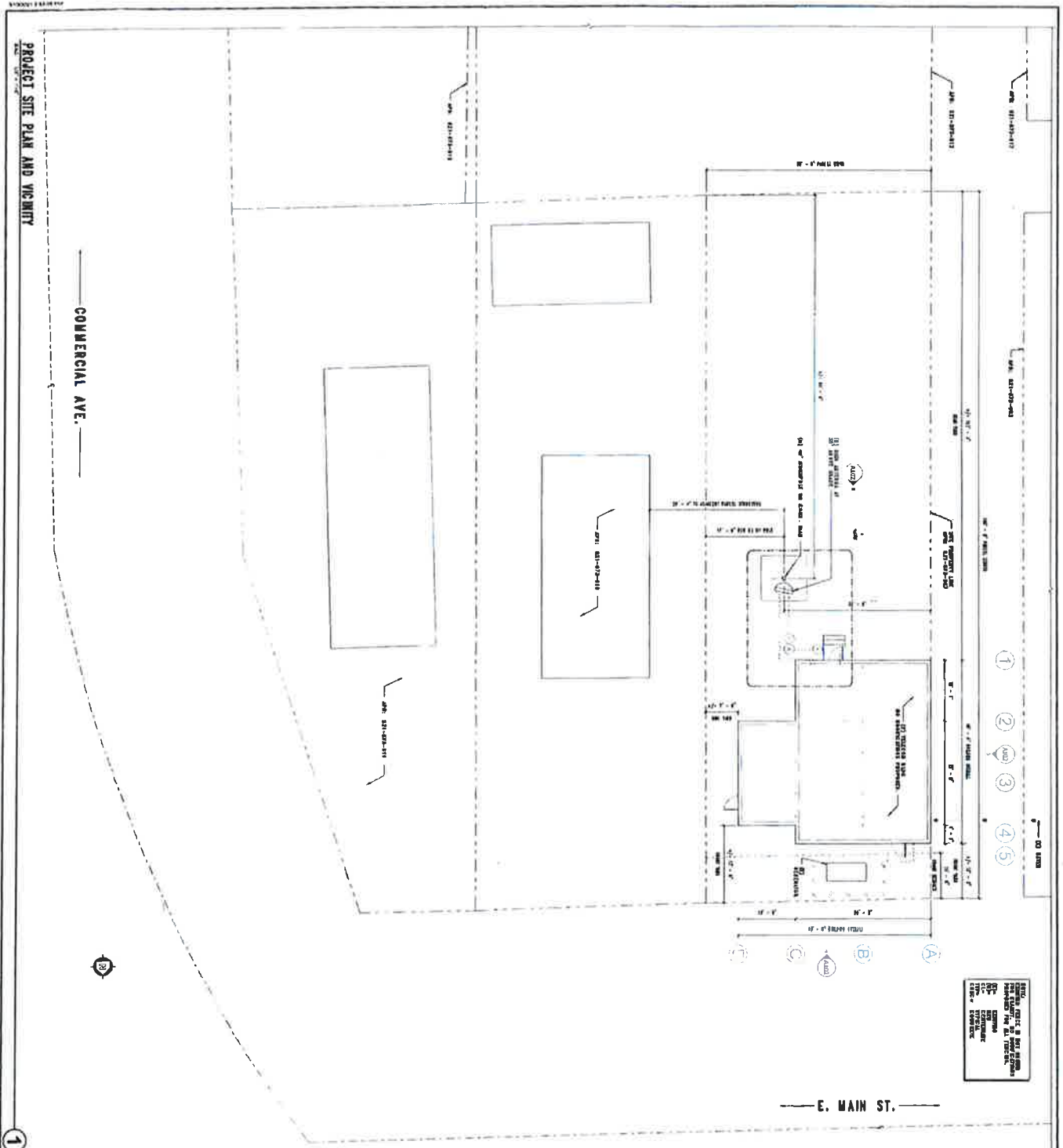
<p>BIG BIG BROTHERS INTERNATIONAL, INC. 10000 W. 16th Ave., Suite 100 Denver, CO 80202 Tel: 303.751.1000 Fax: 303.751.1001</p>	<p>NOT FOR CONSTRUCTION</p>
	<p>AT&T INLAND/SOF</p>
<p>at&t CORPORATE REAL ESTATE</p>	<p>CLIENT: CSD PARSONS</p>
<p>PROJECT: AT&T INLAND/SOF</p>	<p>SITE PLAN AND ELEVATIONS</p>
<p>DATE: 11/11/03</p>	<p>SCALE: AS SHOWN</p>
<p>DESIGNED BY: [Name]</p>	<p>CHECKED BY: [Name]</p>
<p>DRAWN BY: [Name]</p>	<p>DATE: 11/11/03</p>



NORTH ELEVATION



SITE PLAN - NEW MONOPOLE



NOTE: THIS SITE PLAN IS FOR INFORMATION ONLY. IT DOES NOT CONSTITUTE A CONTRACT. THE CONTRACTOR SHALL BE RESPONSIBLE FOR VERIFYING ALL DIMENSIONS AND CONDITIONS ON THE GROUND. THE ENGINEER'S RESPONSIBILITY IS LIMITED TO THE DESIGN AND CONSTRUCTION OF THE PROJECT AS SHOWN ON THIS PLAN.

PROJECT AND PARCEL INFORMATION

OWNER: ABC
 ORDER: 021-073-007
 ADDRESS: 118 E. MAIN ST., HEALING, CA 92327
 LEGAL DESCRIPTION: 118 E. MAIN ST., HEALING, CA 92327
 SITE AREA: 7,200 SQ. FT.
 ZONING: R-1
 SCALE: 1" = 100'
 DATE: 05-15-2024

SCOPE OF WORK: THE PROJECT CONSISTS OF A NEW RESIDENTIAL AND COMMERCIAL BUILDING WITH AN ADJACENT PARKING LOT. THE PROJECT IS SCHEDULED TO BE COMPLETED BY THE END OF 2024. THE ARCHITECT IS PROVIDING THE SITE PLAN AND CONSTRUCTION DOCUMENTS FOR THE PROJECT. THE ENGINEER'S RESPONSIBILITY IS LIMITED TO THE DESIGN AND CONSTRUCTION OF THE PROJECT AS SHOWN ON THIS PLAN.

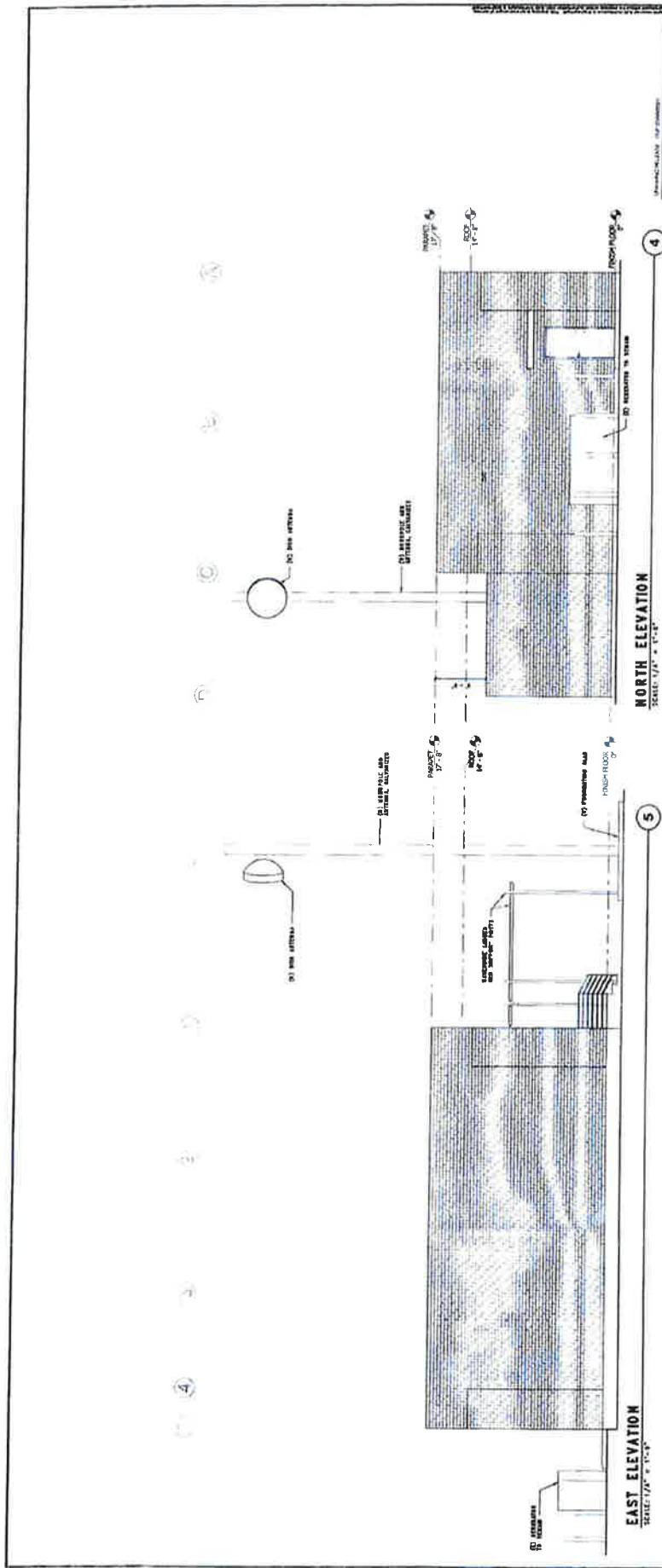
at&t
 CORPORATE REAL ESTATE

BIG

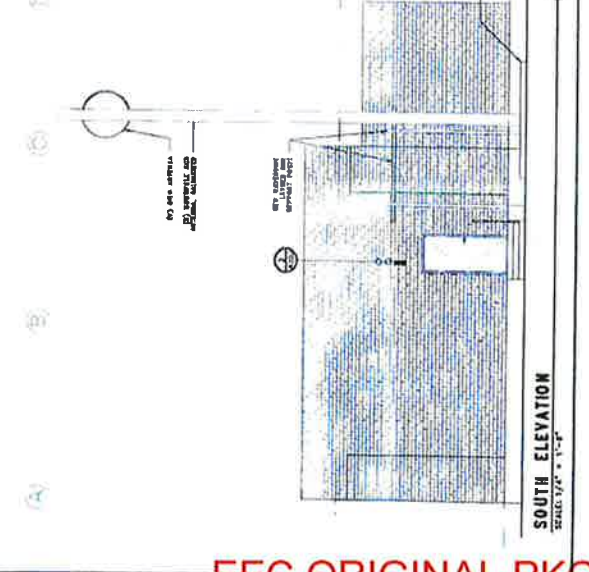
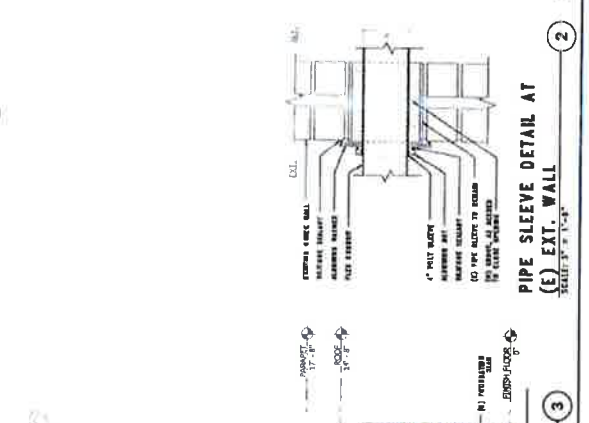
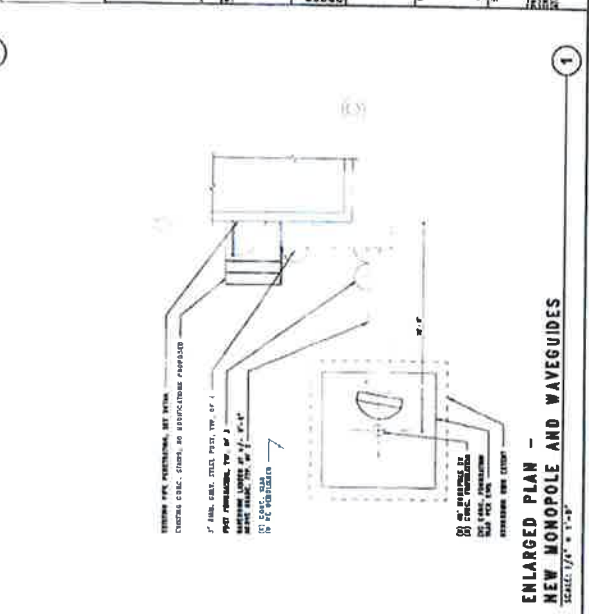
AT&T INLAND/SOP
 201 Main St
 Suite 100
 Geo Park 300K
 Site Plan and Vicinity

PROJECT: AT&T INLAND/SOP
CLIENT: GEO PARK 300K
DATE: 05-15-2024
SCALE: 1" = 100'
DATE: 05-15-2024

REC ORIGINAL PKG

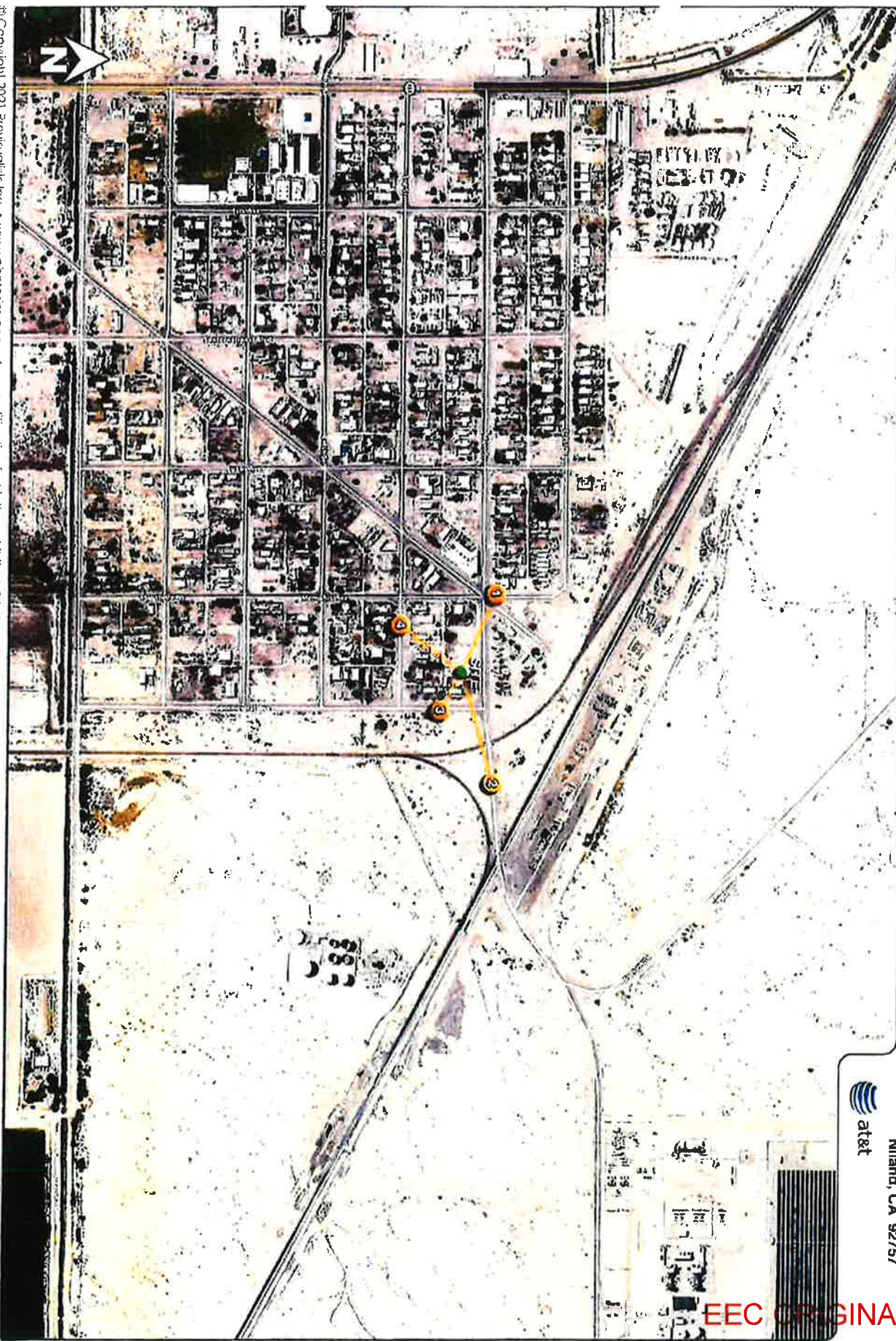


		PROJECT TITLE ELEMENT / SUBELEMENT	
		DATE 3.11.11	SCALE 1/4" = 1'-0"
PREPARED BY: ARCHITECT CHECKED BY: ARCHITECT DRAWN BY: ARCHITECT PROJECT NUMBER: 11111		CLIENT AT&T NILAND/SOF 315 E. 4th St. OAKLAND, CA 94612	
PROJECT NUMBER 11111		DATE 3.11.11	



EEG ORIGINAL PKG

Aerial photograph showing the viewpoints for the photosimulations.



AT&T Niland / SOF
315 E Main St
Niland, CA 92757

EEC ORIGINAL PKG


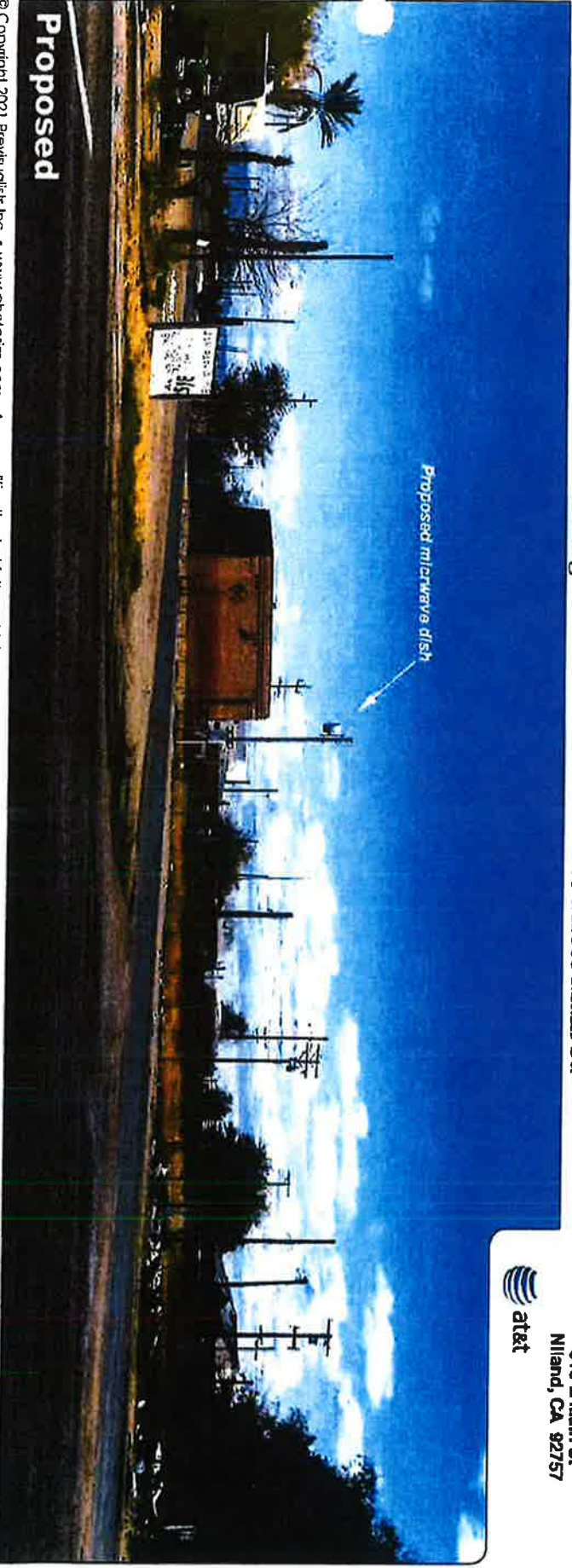
1



Existing

Photosimulation of the view looking southeast from Niland Ave across Main St.

AT&T Niland / SOF
 315 E Main St
 Niland, CA 92757

Proposed

© Copyright 2021 Previsualists Inc. • www.previsualists.com • Any modification is strictly prohibited. Printing letter size or larger is permissible. This photosimulation is based upon information provided by the project applicant.



Existing

Photomontage of the view looking west along Main Street at the railroad tracks.



Proposed

AT&T Niland / SOF
 315 E Main St
 Niland, CA 92757



3

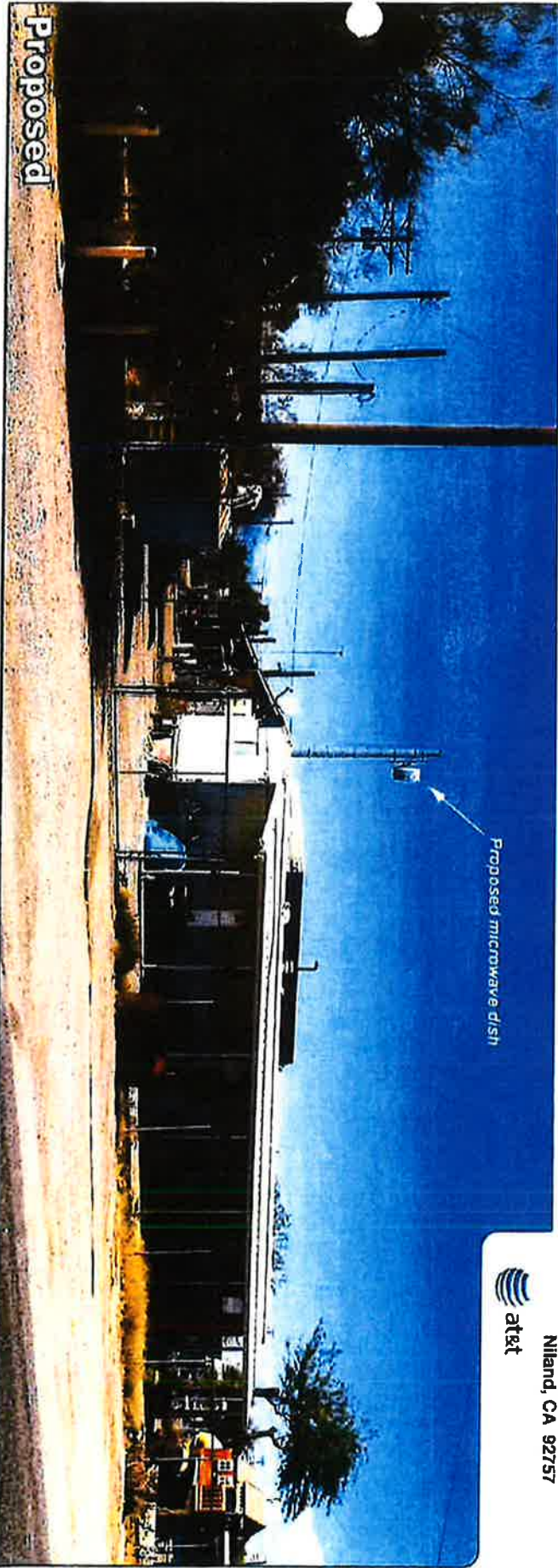
Existing

Photosimulation of the view looking northwest from Commercial Ave.




Proposed microwave dish

Proposed



AT&T Niland / SOF
 315 E Main St
 Niland, CA 92757



at&t

REC ORIGINAL PKG

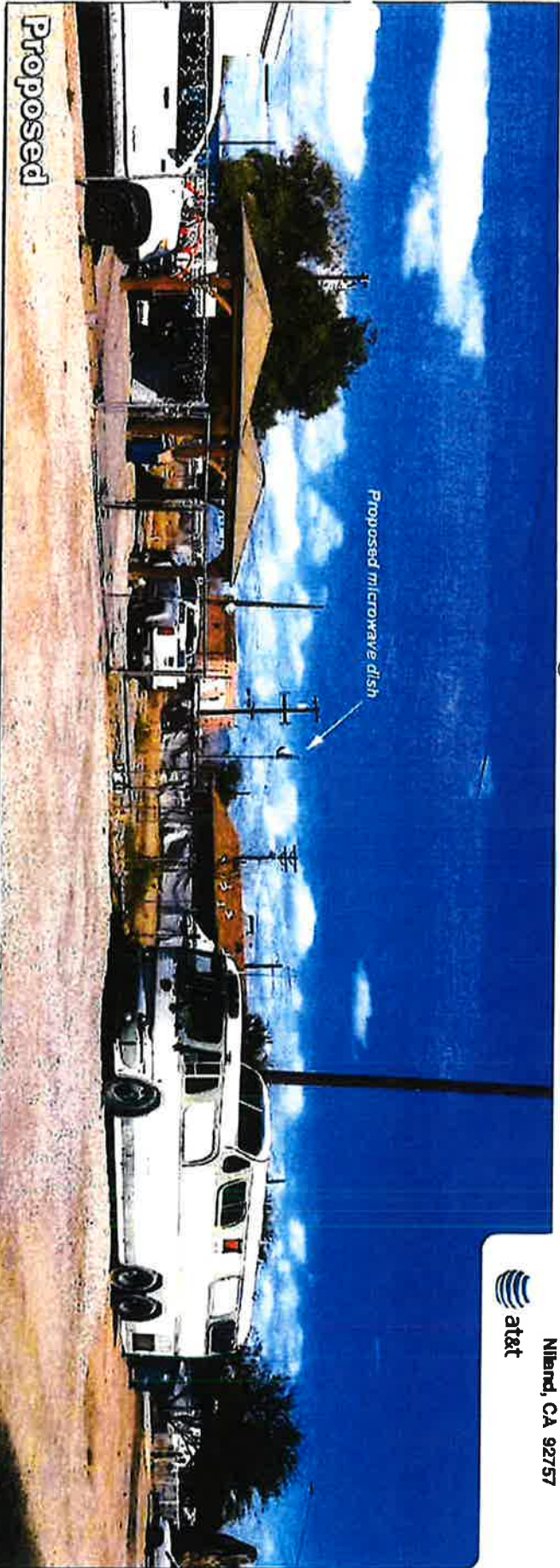
Existing

Photosimulation of the view looking northeast from 3rd Street.



Proposed microwave dish

Proposed



at&t

AT&T Niland / SOF

315 E Main St
Niland, CA 92257

REC ORIGINAL PKG

Attachment A: Comments

EEC ORIGINAL PKG

Jeanine Ramos

From: Timothy Reilly
Sent: Friday, July 2, 2021 2:52 PM
To: Jeanine Ramos; Michael Abraham
Cc: Guillermo Mendoza
Subject: RE: REVIEW - CUP 21-0009

Hi Jeanine,

At this point, I may be the only PW employee with any concerns. The way the structures on the lots are oriented is opposite to the way the lots are oriented on the creating map. For that reason, I am keenly interested in a title report. Hopefully a PTR would disclose a reason for the change in lot configurations. Without any insight, it looks like the existing block ATT building is located on two different lots (at least partially). This may require a lot line adjustment or a different remedy before a monopole antennae could be constructed (on someone else's property).

Please forward a title report once received.

I hope this helps. Thank you.

Timothy J. Reilly, PLS

Certified Federal Surveyor
Imperial County Surveyor
CLSA Desert Chapter President Elect
(442) 265-1839 Direct
155 South 11th Street
El Centro, CA 92243

From: Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>
Sent: Tuesday, May 11, 2021 2:14 PM
To: Timothy Reilly <TimothyReilly@co.imperial.ca.us>; Dennis Richmond <DennisRichmond@co.imperial.ca.us>; Francisco Olmedo <FranciscoOlmedo@co.imperial.ca.us>
Subject: FW: REVIEW - CUP 21-0009
Importance: High

Good afternoon guys,

Planning is asking about any comments regarding the CUP 21-0009

Thanks,

Guillermo Mendoza
Right of Way Technician

EEC ORIGINAL PKG



Imperial County
Department of Public Works
155 S. 11th Street
(442) 265 – 1818

	<p>Due to the Coronavirus (COVID-19) National Emergency NO WALK-IN SERVICE AVAILABLE. Contact us for an appointment. Phone (442) 265-1818 Fax: (442) 265-1858 Email: icpw@co.imperial.ca.us</p>
--	--

From: Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>
Sent: Wednesday, April 21, 2021 11:56 AM
To: Veronica Atondo <VeronicaAtondo@co.imperial.ca.us>; Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>; Dennis Richmond <DennisRichmond@co.imperial.ca.us>; Francisco Olmedo <FranciscoOlmedo@co.imperial.ca.us>; Timothy Reilly <TimothyReilly@co.imperial.ca.us>
Cc: John Gay <JohnGay@co.imperial.ca.us>
Subject: REVIEW - CUP 21-0009
Importance: High

For your review:

- Project No.- [CUP 21-0009](#)
- Comments due by.- **APRIL 22,21**
- The project information is located in its respective digital folder.
- Provide your comments by replying to this email.

Thanks,

Guillermo Mendoza
Right of Way Technician



Imperial County
Department of Public Works
155 S. 11th Street



Imperial Valley Emergency Communications
Communications Authority
2514 La Brucherie Road, Imperial, CA 92251
Voice: 442-265-6029



Imperial County Planning & Development Services
801 Main Street
El Centro, California 92243
Attention: Ms. Jeanine Ramos
April 20, 2021

RE: Comments on Project ID CUP #21-0009

Dear Ms. Ramos:

Thank you very much for the opportunity to review and comment on CUP #21-0009.

AT&T California d.b.a. Pacific Telephone & Telegraph Co. proposes the installation of a new 40-foot tall monopole to extend the services of the US DOD SOF Desert Warfare Training Facility. The project location is 313 E. Main St., Niland, CA 92257, APN 021-073-007-000.

The Imperial Valley Emergency Communications Authority (hereinafter, IVECA), is entrusted with the operation of the 800 MHz radio communication system which serves Imperial County Fire, Law Enforcement, and Emergency Medical Services.

Future IVECA or Imperial County communication needs could necessitate space on the proposed 40-foot monopole and other related on-site infrastructure. The project's location is quite desirable for communication system enhancements that has the potential to benefit an under-served area of Imperial County. We therefore are respectfully requesting a Local/Public Benefit Agreement with CUP #21-0009. We are hopeful for language favorable to IVECA for future communication system additions in perpetuity in said CUP. This would include, but not limited to, multiple antenna spaces, guaranteed antenna heights, and shelter space all at no cost to Imperial County or IVECA. It is obvious that the best interest of Imperial County, first responders, and the public at large are best served with the inclusion of a Local/Public Benefit Agreement.

Thank you in advance for your consideration of IVECA's request. Please contact me with any questions.

Sincerely,

Mark Schmidt
Imperial Valley Emergency Communications Authority (IVECA)
Emergency Communications Project Coordinator
markschmidt@co.imperial.ca.us
Cell: 442-283-1688

RECEIVED

APR 22 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

EEC ORIGINAL PKG



IID

A century of service.

www.iid.com

April 21, 2021

Ms. Jeanine Ramos
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

RECEIVED *since 1911*

APR 21 2021
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

SUBJECT: AT&T Telecom Facility Project; CUP Application No. 21-0009

Dear Ms. Ramos:

On April 7, 2021, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Conditional Use Permit application no. 21-0009. The applicant, AT&T dba Pacific Telephone & Telegraph Co., is proposing the installation of a 40 ft. monopole telecommunications tower at 313 E. Main Street, Niland, California (APN 021-073-007-000) to extend service to the US DOD Special Operations Forces Desert Warfare Training Facility.

The Imperial Irrigation District has reviewed the information and has the following comments:

1. To request electrical service for the proposed communication tower, the applicant should be advised to contact Ignacio Romo, IID Customer Project Development Planner, at (760) 482-3426 or e-mail Mr. Romo at igromo@iid.com to initiate the customer service application process. In addition to submitting a formal application (available for download at the district website <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required submit a complete set of approved project drawings (hard copy and in AutoCad file format), electrical one-line diagram, operating voltage requirement, electrical panel loads, size & location; construction schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicants shall be responsible for all costs and mitigation measures related to providing electrical service to the project.
2. Distribution-rated electrical service is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
3. The applicant will need to abide by the following IID electrical tower service guidelines:
 - a. IID will allow only one metering point per site. If more than one meter is requested, the customer must utilize a multi-meter pack.

- b. For single-phase service from a pole-mounted transformer the total service capacity shall not exceed 600 amps (e.g. six (6) 100 amp panels or three (3) 200 amp panels). Maximum transformer size is a 100kVA, 120/240V.
 - c. For single-phase service from a pad-mounted transformer, the total service capacity shall not exceed 800 amps. Maximum transformer size is a 167kVA, 120/240V.
 - d. Services exceeding 800 amps of total capacity must be served from a three-phase pad-mounted transformer rated at 120/208V. Please note that load must be balanced across the phases.
3. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). The IID encroachment permit application and instructions are available at <https://www.iid.com/about-iid/departments-directory/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
 4. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drain, 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 such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

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

Respectfully,



Dohald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Constance Bergmark – Mgr. of Planning & Eng./Chief Elect. Engineer, Energy Dept.
Jamie Asbury – Assoc. General Counsel
Vance Taylor – Asst. General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

EEC ORIGINAL PKG

Kimberly Noriega

From: Margo Sanchez
Sent: Tuesday, April 20, 2021 6:54 PM
To: Kimberly Noriega; ICPDSCCommentLetters; Jeanine Ramos
Subject: RE: CUP21-0009 Request for Comments

Good afternoon Ms. Ramos,

The Agricultural Commissioner's office has No Comment for CUP21-0009 AT&T California dba Pacific Telephone & Telegraph Co..

Best regards,
Margo



Margo E. Sanchez
Deputy Agricultural Commissioner/Sealer
Imperial County
agcom.imperialcounty.org
442.265.1500

RECEIVED
APR 20 2021
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

From: Kimberly Noriega <KimberlyNoriega@co.imperial.ca.us>
Sent: Monday, April 12, 2021 9:06 AM
To: Carlos Ortiz <CarlosOrtiz@co.imperial.ca.us>; Sandra Mendivil <SandraMendivil@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Matt Dessert <MattDessert@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Ryan Kelley <RyanKelley@co.imperial.ca.us>; Vanessa Ramirez <VanessaRamirez@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Mario Salinas <MarioSalinas@co.imperial.ca.us>; Robert Malek <RobertMalek@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; Carlos Yee <CarlosYee@co.imperial.ca.us>; Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>; scottsheppard@icoso.org; Thomas Garcia <tgarcia@icso.org>; Donald Vargas - IID <DVargas@IID.com>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; mariafroelich@yahoo.com; Alfredo Estrada Jr <AlfredoEstradaJr@co.imperial.ca.us>; Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>; Quechan Indian Tribe <tribalsecretary@quechantribe.com>; katy.sanchez@nahc.ca.gov; byronfrontier@yahoo.com; Scott Sheppeard <scottsheppeard@icso.org>; mariaefroelich@yahoo.com
Cc: Jeanine Ramos <JeanineRamos@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Carina Gomez <CarinaGomez@co.imperial.ca.us>; John Robb <JohnRobb@co.imperial.ca.us>; Maria Scoville <mariascoville@co.imperial.ca.us>; Rosa Soto <RosaSoto@co.imperial.ca.us>; Valerie Grijalva <ValerieGrijalva@co.imperial.ca.us>
Subject: RE: CUP21-0009 Request for Comments

Good afternoon,

Please see attached Request for Comments Packet for Conditional Use Permit #21-0009. Comments are due by **April 22, 2021 at 5:00 PM.**

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

Jeanine Ramos

From: Mario Salinas
Sent: Tuesday, April 13, 2021 8:12 AM
To: Kimberly Noriega
Cc: Jeanine Ramos; Michael Abraham; Carina Gomez; John Robb; Maria Scoville; Rosa Soto; Valerie Grijalva
Subject: RE: CUP21-0009 Request for Comments

Good morning Ms. Noriega,

Pertaining to Request for Comments for CUP21-0009, Division of Environmental Health does not have any comments at this time.

Thank you,

Mario Salinas, MBA

Environmental Health Compliance Specialist I
Imperial County Public Health Department
Division of Environmental Health
797 Main Street Suite B, El Centro, CA 92243
mariosalinas@co.imperial.ca.us
Phone: (442) 265-1888
Fax: (442) 265-1903
www.icphd.org



The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

From: Kimberly Noriega <KimberlyNoriega@co.imperial.ca.us>
Sent: April 7, 2021 4:10 PM
To: Carlos Ortiz <CarlosOrtiz@co.imperial.ca.us>; Sandra Mendivil <SandraMendivil@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Matt Dessert <MattDessert@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Ryan Kelley <RyanKelley@co.imperial.ca.us>; Vanessa Ramirez <VanessaRamirez@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Mario Salinas <MarioSalinas@co.imperial.ca.us>; Robert Malek <RobertMalek@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; Carlos Yee <CarlosYee@co.imperial.ca.us>; Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>; scottshepheard@icoso.org; Thomas Garcia <tgarcia@icoso.org>; Donald Vargas - IID <DVargas@IID.com>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; mariafroelich@yahoo.com; Alfredo Estrada Jr <AlfredoEstradaJr@co.imperial.ca.us>; Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>; Quechan Indian Tribe <tribalsecretary@quechantribe.com>; katy.sanchez@nahc.ca.gov; byronfrontier@yahoo.com

EEC ORIGINAL PKG

Cc: Jeanine Ramos <JeanineRamos@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Carina Gomez <CarinaGomez@co.imperial.ca.us>; John Robb <JohnRobb@co.imperial.ca.us>; Maria Scoville <mariascoville@co.imperial.ca.us>; Rosa Soto <RosaSoto@co.imperial.ca.us>; Valerie Grijalva <ValerieGrijalva@co.imperial.ca.us>

Subject: CUP21-0009 Request for Comments

Good afternoon,

Please see attached Request for Comments Packet for Conditional Use Permit #20-0009. Comments are due by **April 22, 2021 at 5:00 PM.**

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

Should you have any questions regarding this project, please feel free to contact Planner Jeanine Ramos (442)265-1736 ext. 1750 or submit your comment letters to icpdscommentletters@co.imperial.ca.us

Thank you,

Kimberly Noriega

Office Assistant III

Imperial County

Planning and Development Services

801 Main St.

El Centro, CA 92243

Phone: (442) 265-1736

Fax: (442) 265-1735



The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

Kimberly Noriega

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Monday, April 12, 2021 3:56 PM
To: Kimberly Noriega; Jeanine Ramos
Cc: ICPDSComentLetters
Subject: RE: CUP21-0009 Request for Comments

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

This email is to inform you that we have no comments on this project.

From: Kimberly Noriega [mailto:KimberlyNoriega@co.imperial.ca.us]
Sent: Monday, April 12, 2021 9:06 AM
To: Carlos Ortiz; Sandra Mendivil; Margo Sanchez; Matt Dessert; Monica Soucier; Ryan Kelley; Vanessa Ramirez; Jorge Perez; Jeff Lamoure; Mario Salinas; Robert Malek; Andrew Loper; John Gay; Carlos Yee; Guillermo Mendoza; scottshepheard@icoso.org; Thomas Garcia; Donald Vargas - IID; Mark Schmidt; mariafroelich@yahoo.com; Alfredo Estrada Jr; Quechan Historic Preservation Officer; Quechan Indian Tribe ; katy.sanchez@nahc.ca.gov; byronfrontier@yahoo.com; Scott Shepheard; mariaefroelich@yahoo.com
Cc: Jeanine Ramos; Michael Abraham; Carina Gomez; John Robb; Maria Scoville; Rosa Soto; Valerie Grijalva
Subject: RE: CUP21-0009 Request for Comments

Good afternoon,

Please see attached Request for Comments Packet for Conditional Use Permit #21-0009. Comments are due by **April 22, 2021 at 5:00 PM.**

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

Should you have any questions regarding this project, please feel free to contact Planner Jeanine Ramos (442)265-1736 ext. 1750 or submit your comment letters to icpdscommentletters@co.imperial.ca.us

Thank you,

Kimberly Noriega

Office Assistant III

Imperial County
Planning and Development Services
801 Main St.
El Centro, CA 92243
☎ Phone: (442) 265-1736
☎ Fax: (442) 265-1735

RECEIVED
APR 12 2021
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

AIR POLLUTION CONTROL DISTRICT



RECEIVED
APR 12 2021
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

April 12, 2021

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

SUBJECT: Condition Use Permit (CUP) 21-0009—AT&T California dba Pacific Telephone & Telegraph Co.

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") appreciates the opportunity to review and comment on Condition Use Permit (CUP) 21-0009 for the for the installation of a new 40-foot tall monopole, antenna and waveguide ("Project") to extend the telecommunication services of the United States Department of Defense (DoD) Special Operations Forces (SOF) Desert Warfare Training Facility. The Project is located at 313 East Main Street in Niland, also described as Assessor's Parcel Number 021-073-007-000.

As the Project is described as involving "ground disturbance and excavations" it must adhere to **Regulation VIII** which is a collection of rules designed to limit emissions of fugitive dust (PM₁₀) to 20% opacity. The Project is located amid neighboring residences which the Air District considers sensitive receptors that could be adversely impacted by fugitive dust emissions. Therefore, although the property is under five acres the Air District requests that the applicant submit a **Construction Dust Control Plan** and notify the Air District 10 days prior to the start of construction. Should either the construction or operation phase of the Project include the use of a diesel generator above 50 brake horsepower the applicant will need to contact the Permitting & Engineering Division of the Air District to determine permitting requirements.

For purely administrative purposes, please note that the Project is identified as CUP 20-0009 on the cover page and CUP 21-0009 on the inside.

Air District rules and regulations can be accessed online at <https://apcd.imperialcounty.org/rules-and-regulations>. Should you have questions please feel free to contact the Air District for assistance at (442) 265-1800.

Kimberly Noriega

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Thursday, April 8, 2021 8:57 AM
To: Kimberly Noriega
Subject: RE: CUP21-0009 AB52 Letter

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

This email is to inform you that we have no comments on this project.

From: Kimberly Noriega [mailto:KimberlyNoriega@co.imperial.ca.us]
Sent: Wednesday, April 07, 2021 3:02 PM
To: Quechan Indian Tribe ; Quechan Historic Preservation Officer
Cc: Jeanine Ramos; Michael Abraham; Diana Robinson; Carina Gomez; John Robb; Maria Scoville; Rosa Soto; Valerie Grijalva
Subject: CUP21-0009 AB52 Letter

Good morning,

Please find attached CUP20-0009 letter for formal notification of determination and notification of consultation opportunity.

Kind Regards,

Kimberly Noriega

Office Assistant III

Imperial County
Planning and Development Services
801 Main St.
El Centro, CA 92243
☎ **Phone:** (442) 265-1736
☎ **Fax:** (442) 265-1735



RECEIVED

APR 08 2021

IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

Kimberly Noriega

From: Judith Gerlach <judithgerlach@yahoo.com>
Sent: Wednesday, September 1, 2021 12:41 PM
To: ICPDSComentLetters
Subject: 40-foot monopole project

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

This is in response to the notice I received in the mail regarding the monopole project. I will not be able to attend the public meeting and I want it to be known that I oppose this project.

Judith Gerlach

Sent from my iPad

RECEIVED
SEP 01 2021
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

EEC ORIGINAL PKG

**Attachment G: Airport Land Use
Commission Package ALUC #04-21**



Imperial County Planning & Development Services Planning / Building

Jim Minnick
DIRECTOR

TO: Commissioner Mike Goodsell
Commissioner Eddie Cedeno
Commissioner Dennis Logue
Commissioner Kristopher Haugh

FROM: Jim Minnick, Secretary
Planning & Development Services Director

SUBJECT: Public Hearing for the consideration of a proposed 40-foot tall monopole (Conditional Use Permit #21-0009) located at 313 E. Main St, Niland, CA (APN 021-073-007-000) to determine Consistency with the Airport Land Use Compatibility Plan (ALUCP). [Jeanine Ramos, Planner I] (ALUC 04-21)

DATE OF REPORT: May 19, 2021

AGENDA ITEM NO: 2

HEARING DATE: May 19, 2021

HEARING TIME: 6:00 p.m.

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

STAFF RECOMMENDATION

It is Staff's recommendation that the Airport Land Use Commission finds the proposed 40-foot monopole, located at 313 E. Main Street, Niland, CA to be consistent with the 1996 Airport Land Use Compatibility Plan.

SECRETARY'S REPORT

Project Location:

The proposed monopole will be located at 313 E. Main Street, Niland, CA, within the town site of Niland. The property is identified as Assessor's Parcel Number (APN) 021-073-007-000 and is further described as the west 50 ft. of Lots 16, 17, and 18, of Block 35, within the Townsite of Niland, Latitude 33° 14' 23.6N – Longitude 115° 30' 33.3W.

Project Description:

The applicant and property owner is AT&T California d.b.a. Pacific Telephone & Telegraph Company, represented by BJB Architecture & Engineering. They are proposing to install a 40-foot, monopole, antenna, and waveguide in the rear yard to extend services to the United States Department of Defense Special Operations Forces Desert Warfare Training Facility.

The monopole will be placed south of the existing AT&T brick building within a fenced equipment yard located south of East Main Street, between Memphis Avenue and Commercial Avenue. The cabinet electrical and connection equipment will be placed within the existing AT&T brick building. The monopole will have one microwave dish that will be used for data transmission services. Utilities will be connected to the AT&T brick building.

The proposed monopole has been submitted for the Airport Land Use Commission's review and determination of consistency with the 1996 Airport Land Use Compatibility Plan, although the proposed site is not located or within the vicinity of any of the Imperial County Airports.

General Plan/ALUCP Analysis:

The proposed monopole is located within the Niland Urban Area and is not located near any County Public Airport or airstrip. The nearest airport is the Calipatria Municipal Airport which is located about 7.5 miles south of the project site.

The project site is zoned M-1 (Light Industrial) per the Imperial County Land Use Ordinance Title 9, Division 25, Section 92511A.00.

The Airport Land Use Compatibility Plan (ALUCP), Chapter 2, Policies, Section 2.3.1, provides "Types of Actions Reviewed" by the Commission, which shall include:

"Any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities" (Section 2.1.3.3h, pg. 2-4)



The proposed conditional use permit has been submitted for the Airport Land Use Commission's review and determination of consistency with the 1996 Airport Land Use Compatibility Plan (ALUCP) due to the nature of the application (telecommunications tower).

A. VICINITY MAP

PROJECT LOCATION MAP



**AT&T CALIFORNIA D.B.A. PACIFIC
TELEPHONE & TELEGRAPH CO.
APN 021-073-007-000**

-  PROJECT LOCATION
-  TOWER LOCATION



B. PROJECT

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

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

1. PROPERTY OWNER'S NAME AT&T California d.b.a. Pacific Bell	EMAIL ADDRESS dr7282@att.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 2700 Watt Ave. Sacramento, CA	ZIP CODE 95821	PHONE NUMBER (916) 296-0282
3. APPLICANT'S NAME Daniel Redmond	EMAIL ADDRESS dr7282@att.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 7121 Paul Do Mar Way, Elk Grove, CA	ZIP CODE 95757	PHONE NUMBER (916) 296-0282
4. ENGINEER'S NAME Clifford H. Johnson	CA. LICENSE NO. 2602	EMAIL ADDRESS cjohnson@bjginc.com
5. MAILING ADDRESS (Street / P O Box, City, State) 449 S. Virginia St, Fourth Floor, Reno, NV	ZIP CODE 89501	PHONE NUMBER (775) 827-1010
6. ASSESSOR'S PARCEL NO. 021-073-007	SIZE OF PROPERTY (In acres or square foot) 7,800 sq. ft.	ZONING (existing) M-1
7. PROPERTY (site) ADDRESS 315 E. Main St., Niland, CA 92257		
8. GENERAL LOCATION (i.e. city, town, cross street) Near the intersection of E. Main St. and Commercial Ave. in Niland, CA		
9. LEGAL DESCRIPTION West 50 ft. of Lot 16, 17, and 18 of Block 35. Townsite of Niland. Document # 1900I999999		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	The existing AT&T building and property provides local telephone and ethernet services to Niland, CA. The proposed modification will add a monopole, antenna, and waveguide in the rear yard to extend services to the US DOD SOF Desert Warfare Training Facility.
11. DESCRIBE CURRENT USE OF PROPERTY	Telecommunications
12. DESCRIBE PROPOSED SEWER SYSTEM	n/a
13. DESCRIBE PROPOSED WATER SYSTEM	n/a
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	n/a
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? Zero (0), access to site only for maintenance/routine work

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

Daniel Redmond Prof. Network Design Eng. 03/15/2021

Print Name Daniel Redmond Date _____
Signature [Signature]

Print Name _____ Date _____
Signature _____

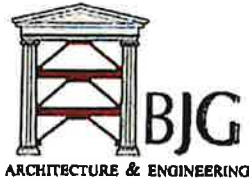
REQUIRED SUPPORT DOCUMENTS

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

APPLICATION RECEIVED BY: _____	DATE _____	REVIEW / APPROVAL BY OTHER DEPT'S required. <input type="checkbox"/> P. W. <input type="checkbox"/> E. H. S. <input type="checkbox"/> A. P. C. D. <input type="checkbox"/> O. E. S. <input type="checkbox"/> _____ <input type="checkbox"/> _____
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	
APPLICATION REJECTED BY: _____	DATE _____	
TENTATIVE HEARING BY: _____	DATE _____	
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	

CUP #
21-0009

03/17/21 mail 8



March 10, 2021

I.C. Planning and Development Services Dept.
801 Main Street
El Centro, CA 92243

Re: Conditional Use Permit – Niland
BJG Project No. 20200064

Dear ICPDS:

We offer the following documents and application for the purpose of obtaining a Conditional Use Permit for new work proposed on parcel number: 021-073-007 in Niland, CA.

The documents included are:

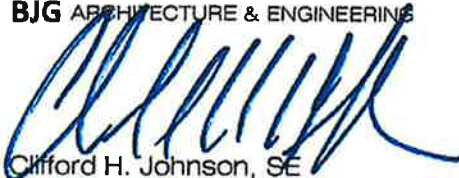
1. Conditional Use Permit application
2. Drawings, two (2) copies each:
 - a. Site Plan and Vicinity
 - b. Enlarged Plan, Elevations, and Details.
3. Photosimulation views of the proposed work described on the plans.
 - a. Four (4) color views, existing vs. proposed

With regard to the fee payment, we ask ICPDS to please call BJG and speak with Cliff Johnson or Monica Stevenson for the payment via credit card. We understand there will be a processing fee of 2.9% added to the fee total.

Thank you for your time and consideration of the Conditional Use Permit application.

Sincerely,

BJG ARCHITECTURE & ENGINEERING



Clifford H. Johnson, SE

Enclosures:

Application

Drawing set, two (2) copies

Photosimulation packet

RECEIVED

MAR 17 2021

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**



February 19, 2021

Imperial County Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Sent via: US mail

RECEIVED

FEB 22 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

**Re: Invitation to Comment (Resent with Updated Address)
Proposed New Tower Build
Site Name: Niland Central Office
315 Main Street, Niland, Imperial County, CA 92577
GE²G Project Number: 311464**

Dear Imperial County Planning & Development Services Department,

On behalf of AT&T Geist Engineering and Environmental Group, Inc. (GE²G), has prepared this invitation to comment pursuant to Section 106 of the National Historic Preservation Act. This invitation to comment is about a proposed new tower build. The purpose of this Invitation to Comment is to help determine if your organization or a party you know would like to issue any comments on the proposed facility potential effects to known archaeology resources, traditional cultural resources, and/or historical properties. GE²G is only seeking specific comments about the potential for the TeleSpan Communications project undertaking new tower build to effect historical properties.

Project Description: AT&T proposes to place a new ~40-foot-tall monopole at the rear of the existing AT&T brick building. The tower will be placed south of AT&T brick building within a fenced equipment yard located south of East Main Street between Memphis Avenue and Commercial Avenue. The cabinet electrical and connection equipment will be housed within the existing AT&T brick building which is older than 45-years old. The monopole tower will receive one microwave dish that will be used for data transmission services. The utilities will be connected from the adjacent AT&T brick building. Ground disturbance and excavations will be completed for this project.

Comments:

Comments on this proposed undertaking on effects to historical properties or resources may be referred to GE²G via phone 510-238-8851, email sgeist@geistenvironmental.com or in writing to GE²G, 4200 Park Boulevard #149, Oakland California 94602 (please reference GE²G project number 311464 with any correspondence). Any comments within the next 30-days would be greatly appreciated. If you have any inquiries or would like any additional information, please contact me at (510) 238-8851.

Sincerely,


Mr. Stephen T. Geist, President
GE²G

Topographic Map, Street Map, Aerial Map, Building picture and Drawings

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington

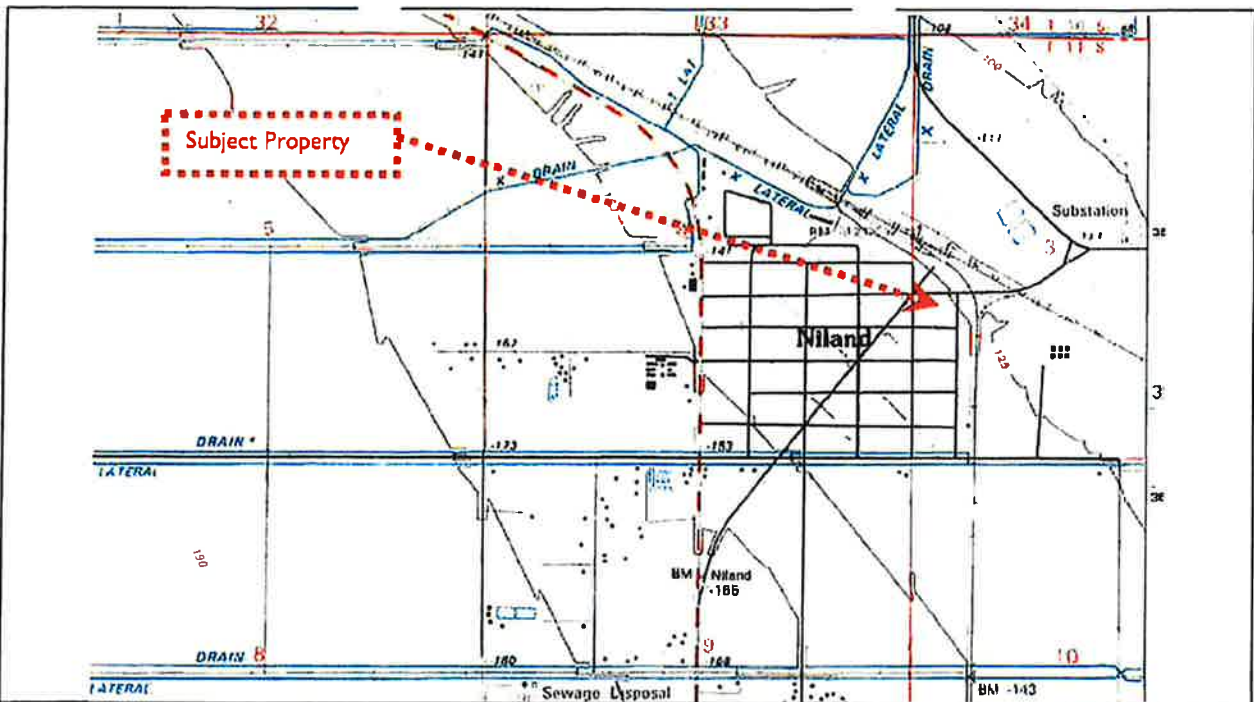


Figure 1: USGS Topographic Map Niland CA - dated 1992
Subject Property: Niland Central Office (source USGS)

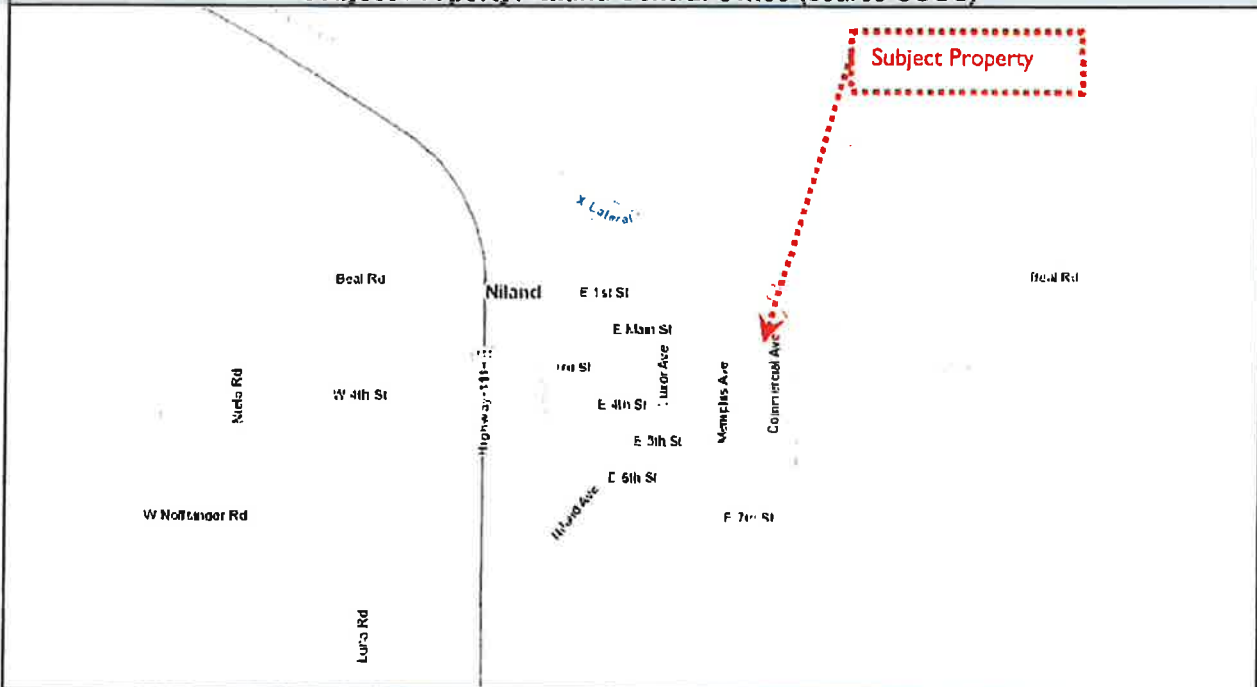


Figure 2: Street Map Subject Property: Niland Central Office (Source USGS)

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
 4200 Park Boulevard #149, Oakland, California 94602
 510.238.8851 (p) / sgeist@ge2g.com
 Field Offices: Arizona, California, Colorado, Oregon, and Washington

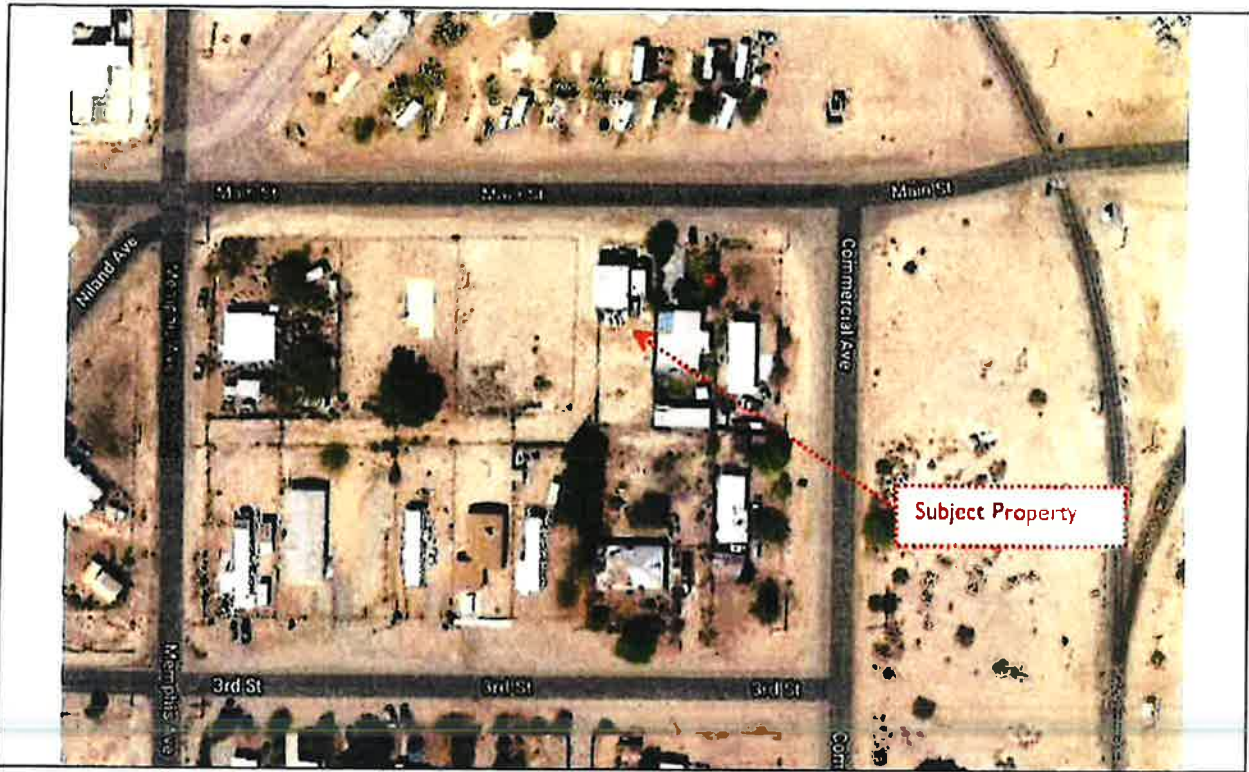


Figure 3: Aerial Subject Property: Niland Central Office (Source Google Maps)



Figure 4: Picture of Subject Property Host Front North Elevation of the Building: Niland Central Office (Source GE²G)

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington

LOT FOR PROGRESS FOR CONCRETE

BJC
BRAND & JONES ARCHITECTS

at&t
AT&T MILAND/SOF

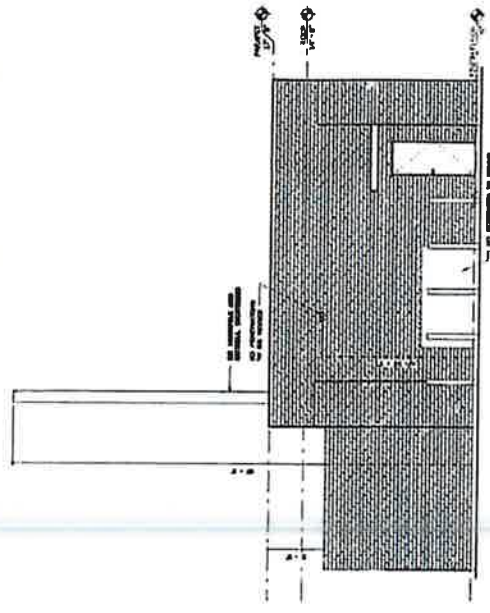
CORPORATE REAL ESTATE

CLIP:000
REVISION: 08 2002

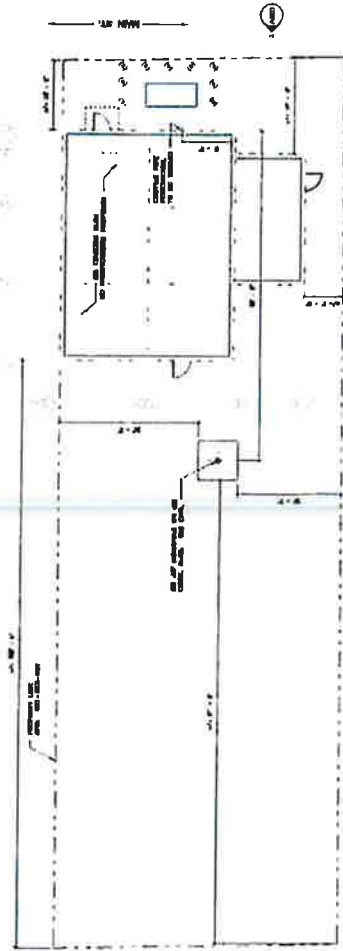
SITE PLAN AND ELEVATIONS
REVISED: 08 2002

1/01

DATE: 08/2002

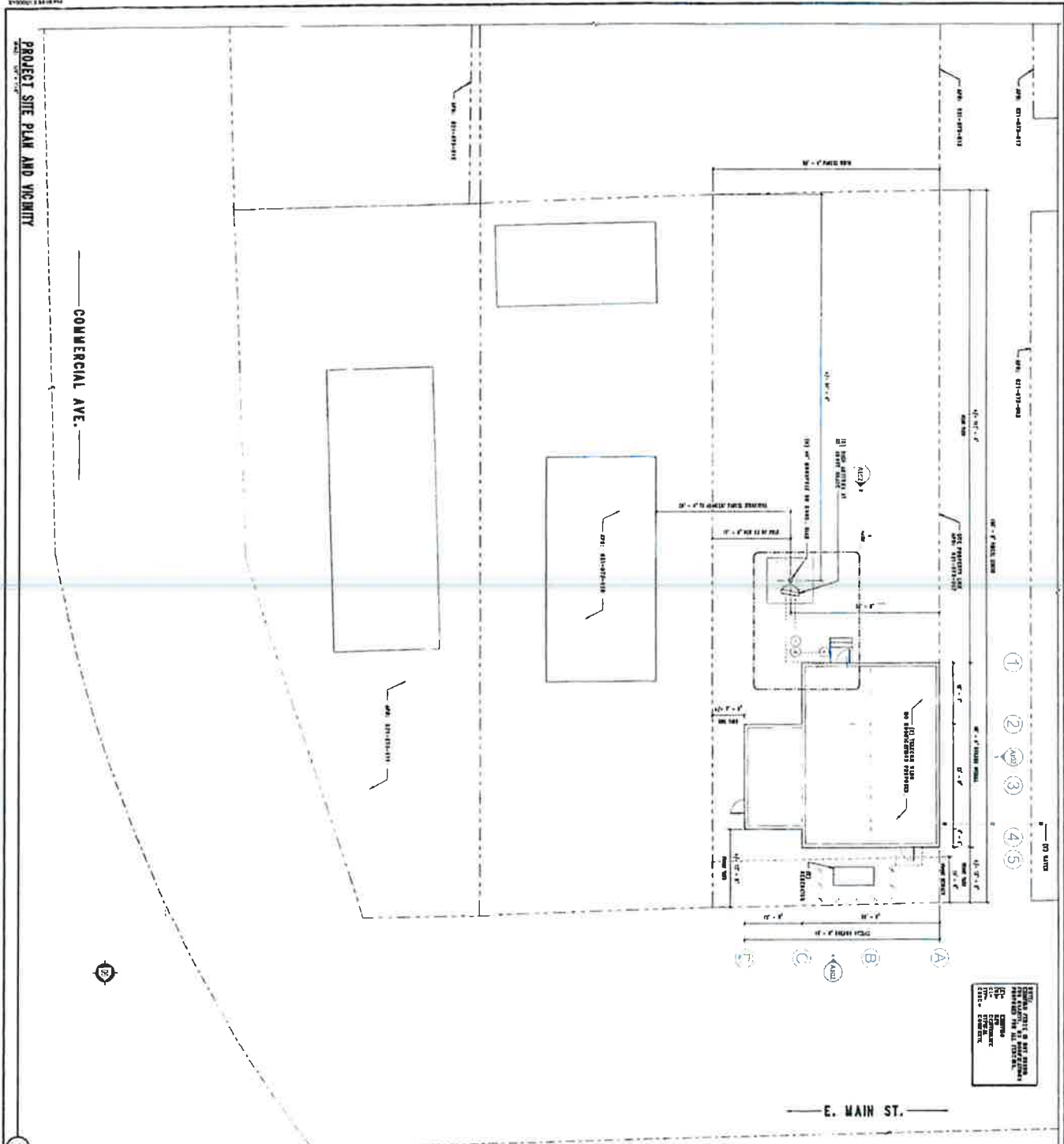


2



1

SITE PLAN - NEW MONOPOLE



NOTES:
 1. ALL DIMENSIONS ARE TO FACE UNLESS NOTED OTHERWISE.
 2. ALL DIMENSIONS ARE TO FACE UNLESS NOTED OTHERWISE.
 3. ALL DIMENSIONS ARE TO FACE UNLESS NOTED OTHERWISE.
 4. ALL DIMENSIONS ARE TO FACE UNLESS NOTED OTHERWISE.

PROJECT AND PARCEL INFORMATION

OBJECT: **AT&T**
 APR: 021-975-903
 ZONE: R-1, LIGHT INDUSTRIAL
 SITE ADDRESS: 210 E. MAIN ST., SAN ANTONIO, TX 78207
 LEGAL DESCRIPTION: BEYOND 16 FT. OF LOT 16, 17 AND 18 OF THE 1/4 SECTION 15, T2N, R14E, S44, COUNTY OF BEXAR, TEXAS, DOCUMENT # 100999948
 SITE AREA: 7,800 SQ. FT.
 SURFACES: 10' - 0"
 FINISH: 0' - 0"
 ELEV: 0' - 0"
 SCALE: 1/4" = 1' - 0"

SCOPE OF WORK:
 THE PROJECT CONSISTS OF A NEW RESIDENTIAL AND COMMERCIAL DEVELOPMENT. THE DEVELOPMENT WILL BE A MIXED-USE DEVELOPMENT INCLUDING A RESIDENTIAL AND COMMERCIAL DEVELOPMENT. THE DEVELOPMENT WILL BE A MIXED-USE DEVELOPMENT INCLUDING A RESIDENTIAL AND COMMERCIAL DEVELOPMENT. THE DEVELOPMENT WILL BE A MIXED-USE DEVELOPMENT INCLUDING A RESIDENTIAL AND COMMERCIAL DEVELOPMENT.

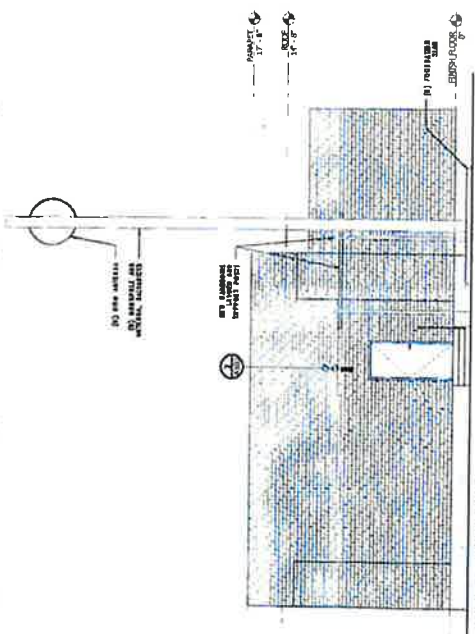
PROJECT AND PARCEL INFORMATION

OBJECT: **AT&T**
 APR: 021-975-903
 ZONE: R-1, LIGHT INDUSTRIAL
 SITE ADDRESS: 210 E. MAIN ST., SAN ANTONIO, TX 78207
 LEGAL DESCRIPTION: BEYOND 16 FT. OF LOT 16, 17 AND 18 OF THE 1/4 SECTION 15, T2N, R14E, S44, COUNTY OF BEXAR, TEXAS, DOCUMENT # 100999948
 SITE AREA: 7,800 SQ. FT.
 SURFACES: 10' - 0"
 FINISH: 0' - 0"
 ELEV: 0' - 0"
 SCALE: 1/4" = 1' - 0"

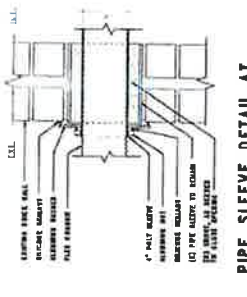
PROJECT AND PARCEL INFORMATION

OBJECT: **AT&T**
 APR: 021-975-903
 ZONE: R-1, LIGHT INDUSTRIAL
 SITE ADDRESS: 210 E. MAIN ST., SAN ANTONIO, TX 78207
 LEGAL DESCRIPTION: BEYOND 16 FT. OF LOT 16, 17 AND 18 OF THE 1/4 SECTION 15, T2N, R14E, S44, COUNTY OF BEXAR, TEXAS, DOCUMENT # 100999948
 SITE AREA: 7,800 SQ. FT.
 SURFACES: 10' - 0"
 FINISH: 0' - 0"
 ELEV: 0' - 0"
 SCALE: 1/4" = 1' - 0"

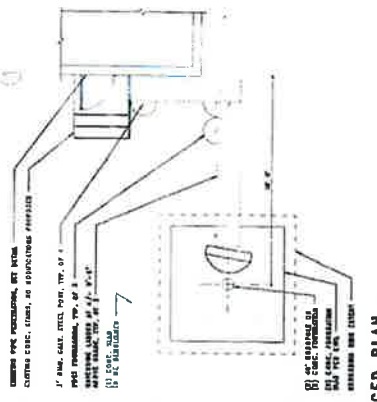
SOUTH ELEVATION
SCALE: 1/4" = 1'-0"



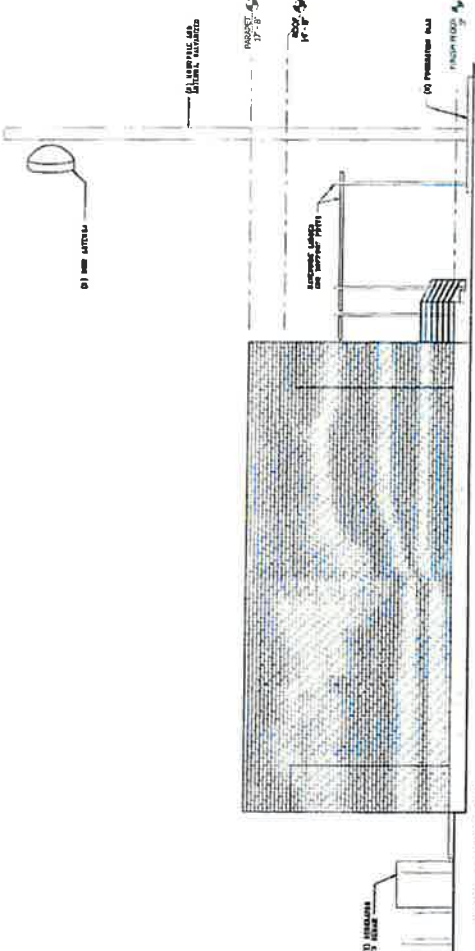
PIPE SLEEVE DETAIL AT (E) EXT. WALL
SCALE: 1" = 1'-0"



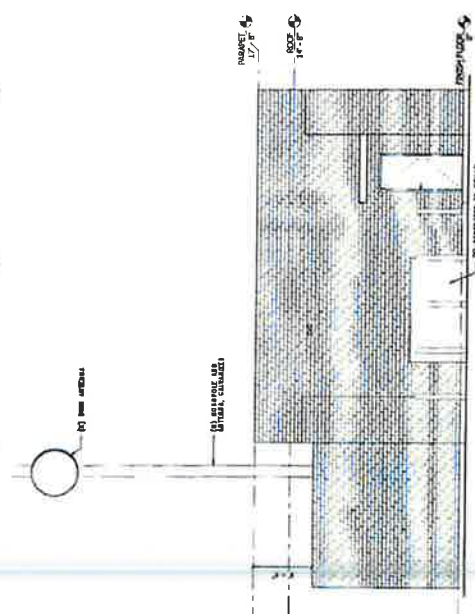
ENLARGED PLAN - NEW MONOPOLE AND WAVEGUIDES
SCALE: 1/4" = 1'-0"



EAST ELEVATION
SCALE: 1/4" = 1'-0"



NORTH ELEVATION
SCALE: 1/4" = 1'-0"

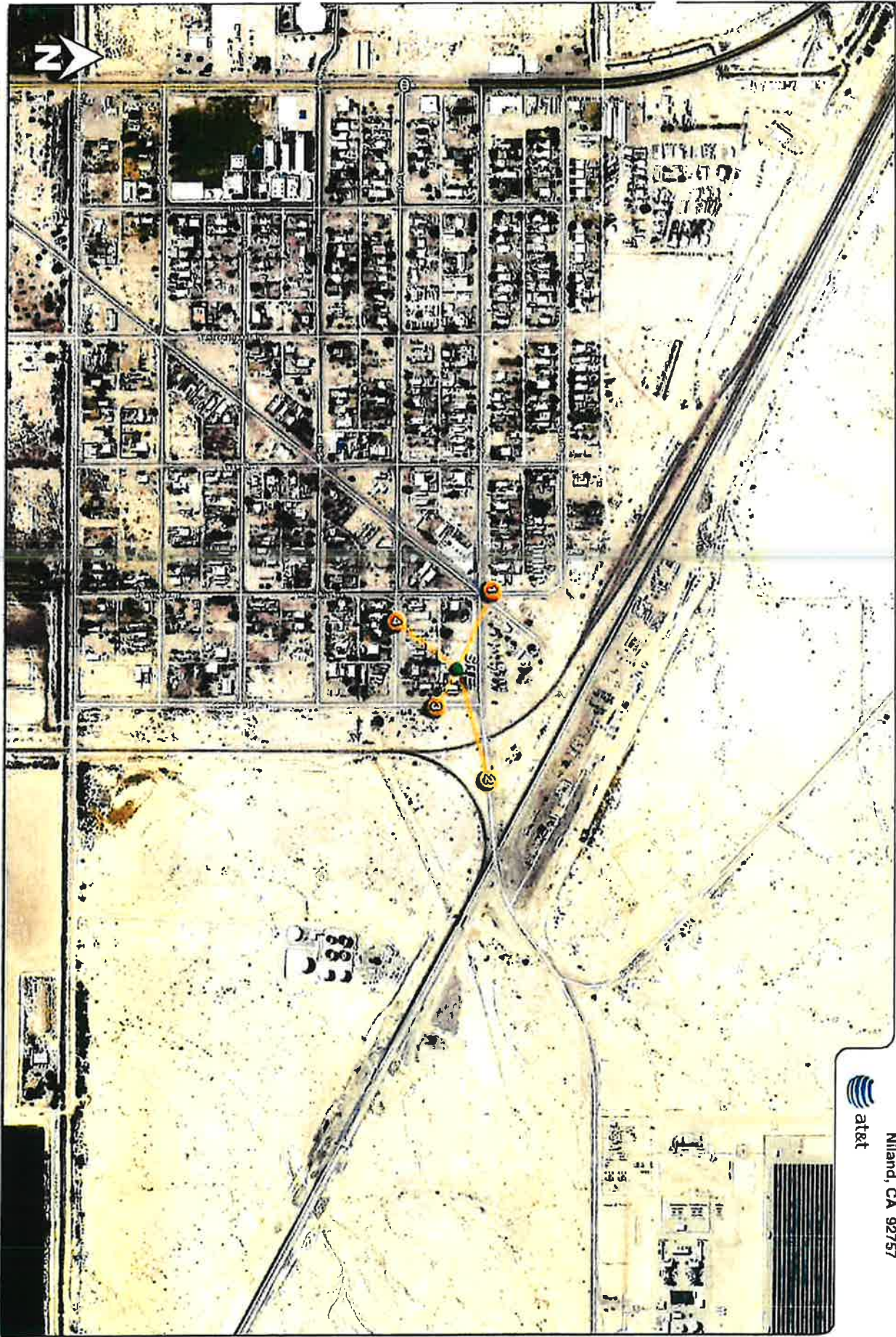


<p>BIG BUILDING INFORMATION GROUP ARCHITECTS</p>	<p>at&t CORPORATE REAL ESTATE</p>	<p>PROJECT: AT&T MILAND/SOF</p>
		<p>CLIENT: XXXX GEO. PAR. XXXX MILAND, CA 95037</p>
<p>DATE: 11/20/04</p>		<p>SCALE: 1/4" = 1'-0"</p>
<p>PROJECT: AT&T MILAND/SOF GEO. PAR. XXXX MILAND, CA 95037</p>		
<p>DATE: 11/20/04</p>		
<p>SCALE: 1/4" = 1'-0"</p>		
<p>PROJECT: AT&T MILAND/SOF GEO. PAR. XXXX MILAND, CA 95037</p>		
<p>DATE: 11/20/04</p>		
<p>SCALE: 1/4" = 1'-0"</p>		

Aerial photograph showing the viewpoints for the photosimulations.



AT & T Niland / SOF
315 E Main St
Niland, CA 92757



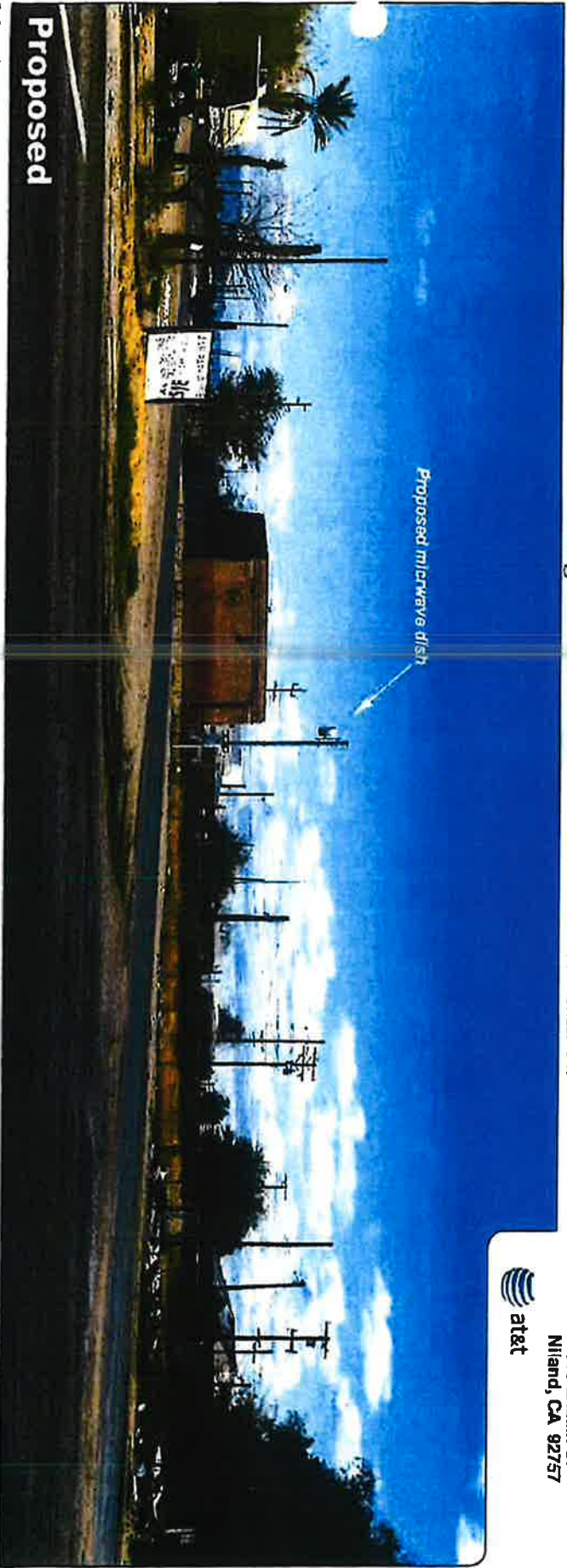
1



Existing

Photosimulation of the view looking southeast from Niland Ave across Main St.

AT&T Niland / SOF
315 E Main St
Niland, CA 92757



Proposed

© Copyright 2021 Previsudistis Inc. • www.photosim.com • Any modification is strictly prohibited. Printing letter size or larger is permissible. This photosimulation is based upon information provided by the project applicant.


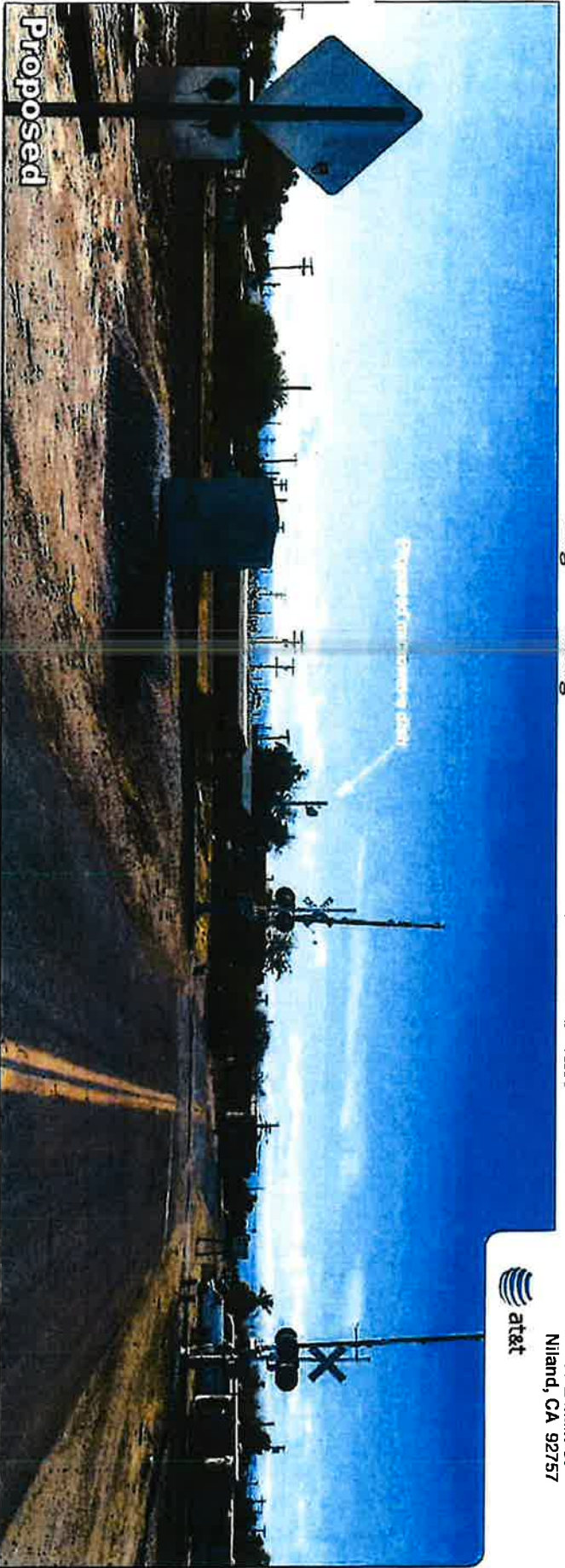
2



Existing

Photostimulation of the view looking west along Main Street at the railroad tracks.

AT&T Niland / SOF
 315 E Main St
 Niland, CA 92757

Proposed

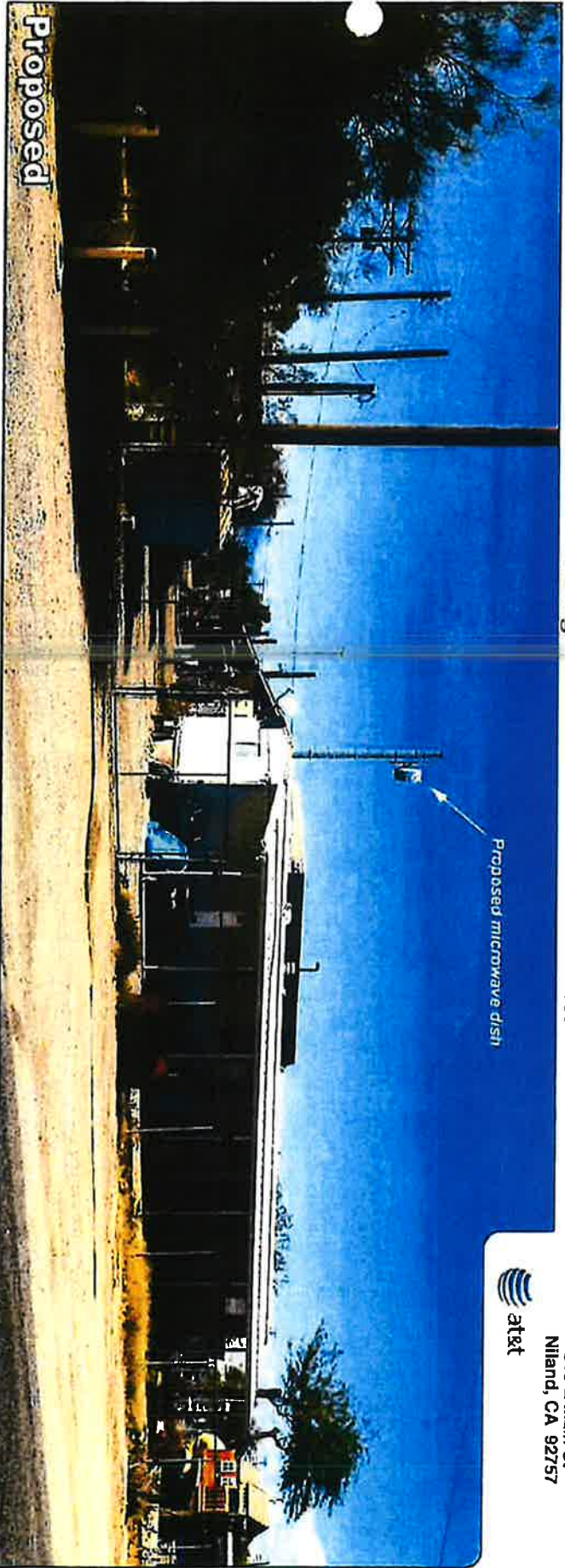



Existing

Photosimulation of the view looking northwest from Commercial Ave.

Proposed microwave dish

AT&T Niland / SOF
315 E Main St
Niland, CA 92757



Proposed

4

Existing

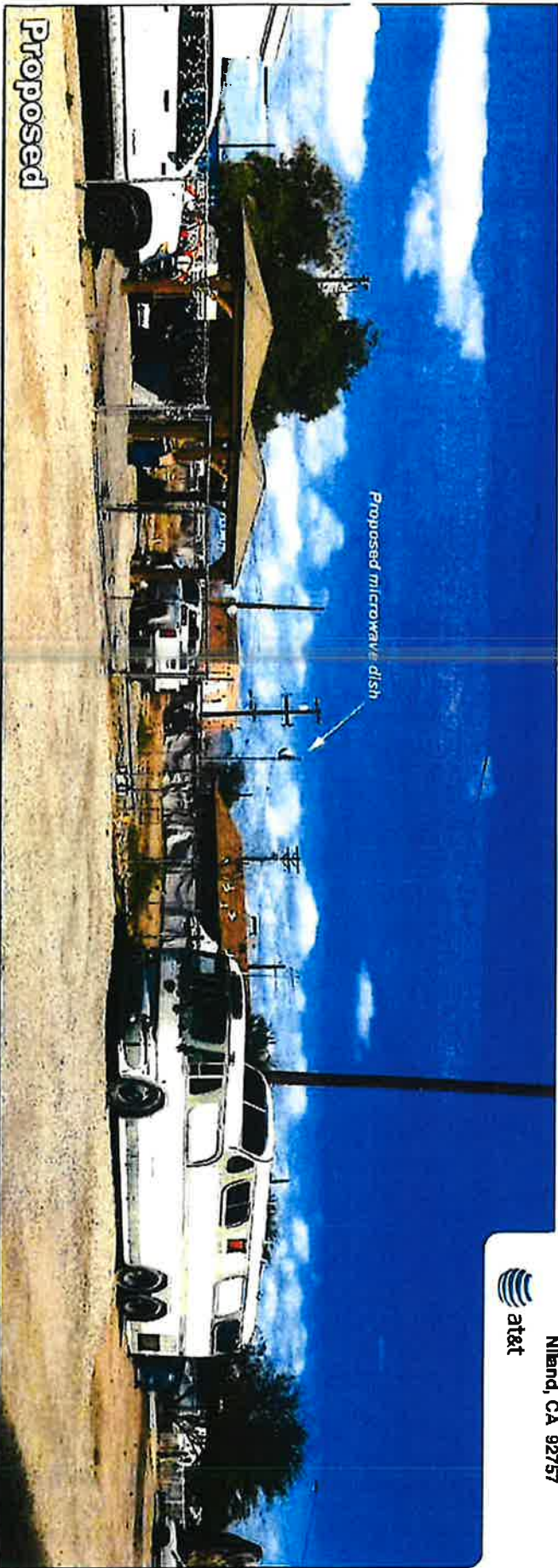
Photosimulation of the view looking northeast from 3rd Street.



AT&T Niland / SOF
315 E Main St
Niland, CA 92757

Proposed microwave dish

Proposed



C. ALUC SECTION

Policies

1. SCOPE OF REVIEW

1. Geographic Area of Concern

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

1. *Airport Vicinity* - All lands on which the uses could be negatively affected by present or future aircraft operations at the following airports in the County and lands on which the uses could negatively affect said airports. The specific limits of the planning area for each airport are depicted on the respective *Compatibility Map* for that airport as presented in Chapter 3.
 - (a) Brawley Municipal Airport.
 - (b) Calexico International Airport.
 - (c) Calipatria Municipal Airport.
 - (d) Holtville Airport.
 - (e) Imperial County Airport.
 - (f) Salton Sea Airport.
 - (g) Naval Air Facility El Centro.

2. *Countywide Impacts on Flight Safety* - Those lands, regardless of their location in the County, on which the uses could adversely affect the safety of flight in the County. The specific uses of concern are identified in Paragraph 2.
3. *New Airports and Heliports* - The site and environs of any proposed new airport or heliport anywhere in the County. The Brawley Pioneers Memorial Hospital has a heliport area on-site.

2. **Types of Airport Impacts**

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

3. **Types of Actions Reviewed**

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

- (a) The adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676 (b)).
- (b) The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impact concerns listed in Paragraph 2 (Section 21676 (b)).
- (c) Adoption or modification of the master plan for an existing public-use airport (Section 21676 (c)).
- (d) Any proposal for a new airport or heliport whether for public use or private use (Section 21661.5).

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

- a) Any proposed expansion of a city's sphere of influence within an airport's planning area.
- b) Any proposed residential planned unit development consisting of five or more dwelling units within an airport's planning area.
- c) Any request for variance from a local agency's height limitation ordinance.
- d) Any proposal for construction or alteration of a structure (including antennas) taller than 150 feet above the ground anywhere within the County.

- e) Any major capital improvements (e.g., water, sewer, or roads) that would promote urban development.
- f) Proposed land acquisition by a government entity (especially, acquisition of a school site).
- g) Building permit applications for projects having a valuation greater than \$500,000.
- h) Any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities.

4. Review Process

1. *Timing of Project Submittal* - Proposed actions listed in Paragraph 3.1 must be submitted to the Commission for review prior to approval by the local government entity. All projects shall be referred to the Commission at the earliest reasonable point in time so that the Commission's review can be duly considered by the local jurisdiction prior to formalizing its actions. At the local government's discretion, submittal of a project for Airport Land Use Commission review can be done before, after, or concurrently with review by the local planning commission or other local advisory bodies.
2. *Commission Action Choices* - When reviewing a land use project proposal, the Airport Land Use Commission has a choice of either of two actions: (1) find the project *consistent* with the *Airport Land Use Compatibility Plan*; or, (2) find the project *inconsistent* with the Plan. In making a finding of inconsistency, the Commission may note the conditions under which the project would be consistent with the Plan. The Commission cannot, however, find a project consistent with the Plan subject to the inclusion of certain conditions in the project.

3. *Subsequent Review*- Once a project has been found consistent with the *Airport Land Use Compatibility Plan*, it need not be referred for review at subsequent stages of the planning process (e.g., for a general plan amendment and again for a zoning change) unless: (1) major changes to the project are made during subsequent review and consideration by the local jurisdiction; or (2) the local jurisdiction agrees that further review is warranted.

4. *Response Time* - The Airport Land Use Commission must respond to a local agency's request for a consistency determination on a project within 60 days from date of acceptance/referral (Section 21676 (d)). If the Commission fails to make the determination within that period, the proposed action shall be deemed consistent with the *Airport Land Use Compatibility Plan*. Regardless of Commission action or failure to act, the proposed action must also comply with other applicable local, state, and federal regulations and laws.

(a) Matters referred to the Commission for review shall be deemed complete upon the date when all materials and information necessary for processing a project have been confirmed as received by Commission staff. Staff will inform the applicant, or local jurisdiction, in writing within ten working days after receipt of an item for consideration, whether more information is necessary or if the item will then be deemed complete and scheduled for formal review by the Commission.

(b) Necessary information may include final plans, acoustical reports, FAA Aeronautical Studies when deemed necessary for Commission review by staff. This procedure does not apply to screen check or draft environmental impact report responses which staff will respond to within the specified review period. Such official written confirmation of acceptance of a referral by staff within ten working days shall initiate the sixty-day review period pursuant to Public Utilities Code, Section 21676(d). If the applicant, or local jurisdiction, is not contacted by Commission staff by the sixth business day, they should contact the Planning/Building Department to verify receipt of the original referral package. Upon receipt of a complete referral for Commission review and consideration, the Commission Secretary shall schedule and agendaize said referral for the appropriate Airport Land Use Commission meeting.

Table 2A Continued
Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

NOTES

- 1 Residential development should not contain more than the indicated number of dwelling units per gross acre. Clustering of units is encouraged as a means of meeting the Required Open Land requirements.
- 2 The land use should not attract more than the indicated number of people per acre at any time. This figure should include all individuals who may be on the property (e.g., employees, customers/visitors, etc.). These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses.
- 3 See Policy 2.5.
- 4 These uses typically can be designed to meet the density requirements and other development conditions listed.
- 5 These uses typically do not meet the density and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and no feasible alternative location exists.
- 6 See Policy 3.4
- 7 NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure.

BASIS FOR COMPATIBILITY ZONE BOUNDARIES

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

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

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

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

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

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

- B1 The outer boundary of the Approach/Departure Zone is defined as the area where aircraft are commonly below 400 feet above ground level (AGL). For visual runways, this location encompasses the base leg of the traffic pattern as commonly flown. For instrument runways, the

altitudes established by approach procedures are used. Zone B1 also includes areas within 1,000 feet laterally from the runway centerline.

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

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

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

sm/Imprcrit.

Attachment H: Application Package

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

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

1. PROPERTY OWNER'S NAME AT&T California d.b.a. Pacific Bell	EMAIL ADDRESS dr7282@att.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 2700 Watt Ave. Sacramento, CA	ZIP CODE 95821	PHONE NUMBER (916) 296-0282
3. APPLICANT'S NAME Daniel Redmond	EMAIL ADDRESS dr7282@att.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 7121 Paul Do Mar Way, Elk Grove, CA	ZIP CODE 95757	PHONE NUMBER (916) 296-0282
4. ENGINEER'S NAME Clifford H. Johnson	CA. LICENSE NO. 2602	EMAIL ADDRESS cjohnson@bjginc.com
5. MAILING ADDRESS (Street / P O Box, City, State) 449 S. Virginia St, Fourth Floor, Reno, NV	ZIP CODE 89501	PHONE NUMBER (775) 827-1010
6. ASSESSOR'S PARCEL NO. 021-073-007	SIZE OF PROPERTY (in acres or square foot) 7,800 sq. ft.	ZONING (existing) M-1
7. PROPERTY (site) ADDRESS 315 E. Main St., Niland, CA 92257		
8. GENERAL LOCATION (i.e. city, town, cross street) Near the intersection of E. Main St. and Commercial Ave. in Niland, CA		
9. LEGAL DESCRIPTION West 50 ft. of Lot 16, 17, and 18 of Block 35. Townsite of Niland. Document # 1900I999999		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	The existing AT&T building and property provides local telephone and ethernet services to Niland, CA. The proposed modification will add a monopole, antenna, and waveguide in the rear yard to extend services to the US DOD SOF Desert Warfare Training Facility.
11. DESCRIBE CURRENT USE OF PROPERTY	Telecommunications
12. DESCRIBE PROPOSED SEWER SYSTEM	n/a
13. DESCRIBE PROPOSED WATER SYSTEM	n/a
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	n/a
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? Zero (0), access to site only for maintenance/routine work

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

Daniel Redmond Prof. Network Design Eng. 03/15/2021

Print Name DRW Date _____
Signature _____

Print Name _____ Date _____
Signature _____

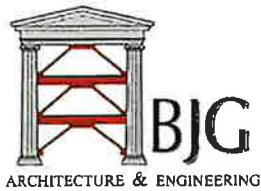
REQUIRED SUPPORT DOCUMENTS

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

APPLICATION RECEIVED BY: _____	DATE _____	REVIEW / APPROVAL BY OTHER DEPT'S required. <input type="checkbox"/> P. W. <input type="checkbox"/> E. H. S. <input type="checkbox"/> A. P. C. D. <input type="checkbox"/> O. E. S. <input type="checkbox"/> _____ <input type="checkbox"/> _____
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	
APPLICATION REJECTED BY: _____	DATE _____	
TENTATIVE HEARING BY: _____	DATE _____	
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	

CUP #
21-0009

03/17/21 mail



March 10, 2021

I.C. Planning and Development Services Dept.
801 Main Street
El Centro, CA 92243

Re: Conditional Use Permit – Niland
BJG Project No. 20200064

Dear ICPDS:

We offer the following documents and application for the purpose of obtaining a Conditional Use Permit for new work proposed on parcel number: 021-073-007 in Niland, CA.

The documents included are:

1. Conditional Use Permit application
2. Drawings, two (2) copies each:
 - a. Site Plan and Vicinity
 - b. Enlarged Plan, Elevations, and Details.
3. Photosimulation views of the proposed work described on the plans.
 - a. Four (4) color views, existing vs. proposed

With regard to the fee payment, we ask ICPDS to please call BJB and speak with Cliff Johnson or Monica Stevenson for the payment via credit card. We understand there will be a processing fee of 2.9% added to the fee total.

Thank you for your time and consideration of the Conditional Use Permit application.

Sincerely,

BJG ARCHITECTURE & ENGINEERING

Clifford H. Johnson, SE

Enclosures:
Application
Drawing set, two (2) copies
Photosimulation packet

RECEIVED

MAR 17 2021

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**



February 19, 2021

Imperial County Planning & Development Services Department
801 Main Street
El Centro, CA 92243

Sent via: US mail

RECEIVED

FEB 22 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

**Re: Invitation to Comment (Resent with Updated Address)
Proposed New Tower Build
Site Name: Niland Central Office
315 Main Street, Niland, Imperial County, CA 92577
GE²G Project Number: 311464**

Dear Imperial County Planning & Development Services Department,

On behalf of AT&T Geist Engineering and Environmental Group, Inc. (GE²G), has prepared this invitation to comment pursuant to Section 106 of the National Historic Preservation Act. This invitation to comment is about a proposed new tower build. The purpose of this Invitation to Comment is to help determine if your organization or a party you know would like to issue any comments on the proposed facility potential effects to known archaeology resources, traditional cultural resources, and/or historical properties. GE²G is only seeking specific comments about the potential for the TeleSpan Communications project undertaking new tower build to effect historical properties.

Project Description: AT&T proposes to place a new ~40-foot-tall monopole at the rear of the existing AT&T brick building. The tower will be placed south of AT&T brick building within a fenced equipment yard located south of East Main Street between Memphis Avenue and Commercial Avenue. The cabinet electrical and connection equipment will be housed within the existing AT&T brick building which is older than 45-years old. The monopole tower will receive one microwave dish that will be used for data transmission services. The utilities will be connected from the adjacent AT&T brick building. Ground disturbance and excavations will be completed for this project.

Comments:

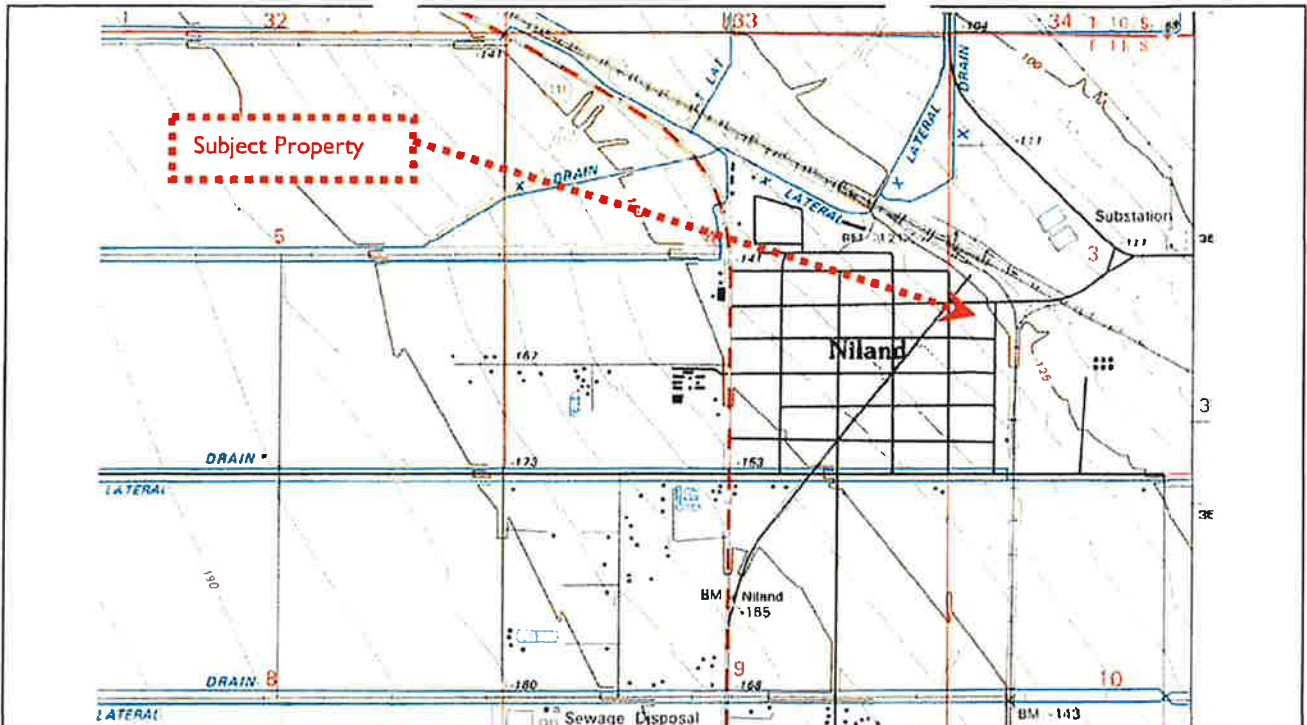
Comments on this proposed undertaking on effects to historical properties or resources may be referred to GE²G via phone 510-238-8851, email sgeist@geistenvironmental.com or in writing to GE²G, 4200 Park Boulevard #149, Oakland California 94602 (please reference GE²G project number 311464 with any correspondence). Any comments within the next 30-days would be greatly appreciated. If you have any inquiries or would like any additional information, please contact me at (510) 238-8851.

Sincerely,

Mr. Stephen T. Geist, President
GE²G

Topographic Map, Street Map, Aerial Map, Building picture and Drawings

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington



**Figure 1: USGS Topographic Map Niland CA - dated 1992
Subject Property: Niland Central Office (source USGS)**

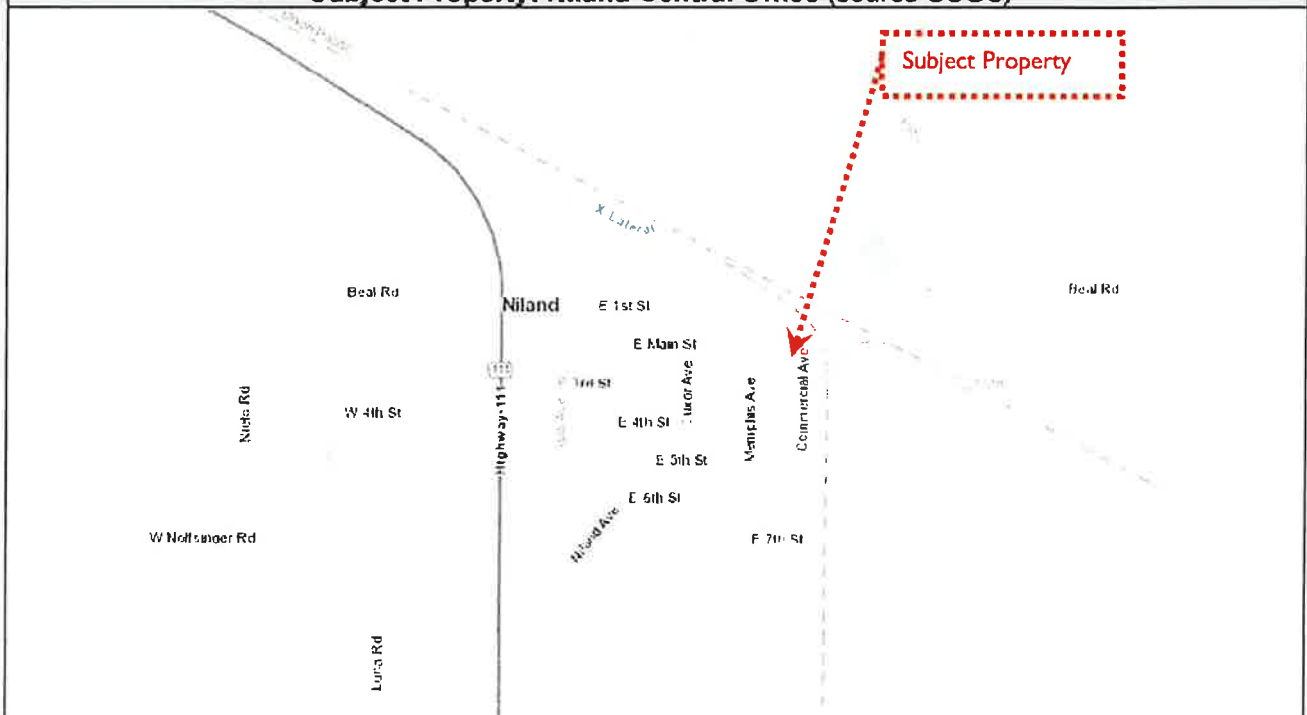


Figure 2: Street Map Subject Property: Niland Central Office (Source USGS)

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
 4200 Park Boulevard #149, Oakland, California 94602
 510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington

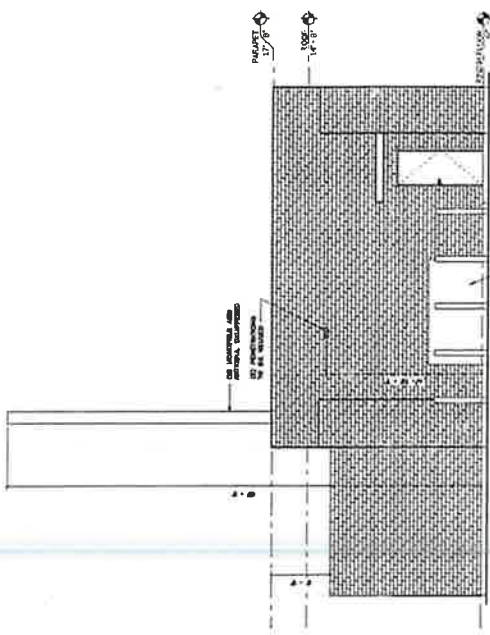


Figure 3: Aerial Subject Property: Niland Central Office (Source Google Maps)

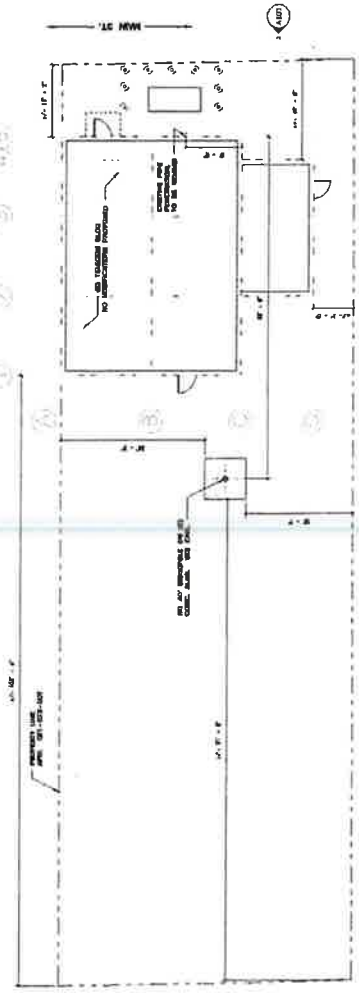


Figure 4: Picture of Subject Property Host Front North Elevation of the Building:
Niland Central Office (Source GE²G)

GEIST ENGINEERING AND ENVIRONMENTAL GROUP, INC.
4200 Park Boulevard #149, Oakland, California 94602
510.238.8851 (p) / sgeist@ge2g.com
Field Offices: Arizona, California, Colorado, Oregon, and Washington



NORTH ELEVATION



SITE PLAN - NEW MONOPOLE

NOT FOR CONSTRUCTION
 PROJECT: CLU-XXX
 SHEET: 101

AT&T
 CORPORATE REAL ESTATE
 AT&T INLAND/SOF

101 E MAIN ST.
 IRVINE, CA 92614
 TEL: (949) 434-2000
 FAX: (949) 434-2001

PROJECT: CLU-XXX
 SHEET: 101

SITE PLAN AND ELEVATIONS

PREPARED BY: [Name]
 DATE: [Date]

**Attachment I: Revisions to the
Application Package Dated
September 23, 2021**

CONDITIONAL USE PERMIT

I.C. PLANNING & DEVELOPMENT SERVICES DEPT.
801 Main Street, El Centro, CA 92243 (760) 482-4236

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

1. PROPERTY OWNER'S NAME AT&T California d.b.a. Pacific Bell	EMAIL ADDRESS lr2326@att.com	
2. MAILING ADDRESS (Street / P O Box, City, State) 2700 Watt Avenue, Sacramento, CA	ZIP CODE 95821	PHONE NUMBER (626) 817-4312
3. APPLICANT'S NAME Linda S. Rankin	EMAIL ADDRESS lr2326@att.com	
4. MAILING ADDRESS (Street / P O Box, City, State) 600 E. Green St., Room 300, Pasadena, CA	ZIP CODE 91101	PHONE NUMBER (626) 817-4312
4. ENGINEER'S NAME Clifford H. Johnson	CA. LICENSE NO. 2602	EMAIL ADDRESS cjohnson@bjginc.com
5. MAILING ADDRESS (Street / P O Box, City, State) 675 W. Moana Lane, Suite 107, Reno, NV	ZIP CODE 89509	PHONE NUMBER (775) 827-1010
6. ASSESSOR'S PARCEL NO. 021-073-007	SIZE OF PROPERTY (in acres or square foot) 7,800 sq. ft.	ZONING (existing) M-1
7. PROPERTY (site) ADDRESS 313 E. Main St., Niland, CA 92257		
8. GENERAL LOCATION (i.e. city, town, cross street) Near the intersection of E. Main St. and Commercial Ave. in Niland, CA		
9. LEGAL DESCRIPTION West 50 ft. of Lot 16, 17, and 18 of Block 35. Townsite of Niland. Document # 1900199999		

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

10. DESCRIBE PROPOSED USE OF PROPERTY (list and describe in detail)	The existing AT&T building and property provides local telephone and ethernet services to Niland, CA. The proposed modification will add a monopole, antenna, and waveguide in the rear yard to extend services to the US DOD SOF Desert Warfare Training Facility.
11. DESCRIBE CURRENT USE OF PROPERTY	Telecommunications
12. DESCRIBE PROPOSED SEWER SYSTEM	n/a
13. DESCRIBE PROPOSED WATER SYSTEM	n/a
14. DESCRIBE PROPOSED FIRE PROTECTION SYSTEM	n/a
15. IS PROPOSED USE A BUSINESS? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	IF YES, HOW MANY EMPLOYEES WILL BE AT THIS SITE? Zero (0), access to site only for maintenance/routine work

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

LINDA S. RANKIN 06/29/2021
Print Name Date
Linda S Rankin
Signature

Print Name

Date

Signature

REQUIRED SUPPORT DOCUMENTS

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

APPLICATION RECEIVED BY: _____	DATE _____	REVIEW / APPROVAL BY OTHER DEPT'S required:
APPLICATION DEEMED COMPLETE BY: _____	DATE _____	<input type="checkbox"/> P. W.
APPLICATION REJECTED BY: _____	DATE _____	<input type="checkbox"/> E. H. S.
TENTATIVE HEARING BY: _____	DATE _____	<input type="checkbox"/> A. P. C. D.
FINAL ACTION: <input type="checkbox"/> APPROVED <input type="checkbox"/> DENIED	DATE _____	<input type="checkbox"/> O. E. S.
		<input type="checkbox"/> _____
		<input type="checkbox"/> _____

CUP #

Corporate Real Estate

ATT Services, Inc.
600 E. Green Street
Room 300
Pasadena, CA 91101



July 29, 2021

Imperial County
Dept. of Planning & Development Services
801 Mail Street
El Centro, CA 92243

RE: CUP #21-0009; 313 E. Main Street, Niland

Dear Sir or Madam:

Please be advised that Mr. Clifford Johnson of BJB Architecture & Engineering is authorized to represent and procure the necessary approvals, entitlements, permits, submittals and/or resubmittals of any documents, on behalf of the owner of the above referenced property, Pacific Bell Telephone Company and AT&T California, (together "AT&T"), as related to the above referenced property and subject matter.

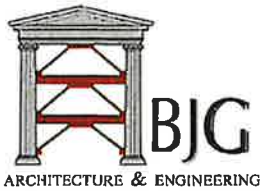
Mr. Johnson is further authorized to speak on behalf of AT&T on submittals and submit applications as may be applicable. Should you have any questions regarding any of the abovementioned items, please contact me at 626-817-4312 or by email at lr2326@att.com.

Thank you in advance for your time and assistance with this matter.

Sincerely,

A handwritten signature in cursive script that reads "Linda S. Rankin". The signature is written in dark ink and is positioned above the typed name.

Linda S. Rankin
AT&T – Area Manager, Corporate Real Estate



PROJECT: AT&T Niland/SOF
BJG Project: 20200064

Project Description

Date: September 23, 2021

TO: Imperial County Planning and
Development Services

BJG Project Manager: Erin Reyes
AT&T Project Manager: Dan Redmond

ATTN: Jeanine Ramos and Diana Robinson

Re: CUP21-0009

The following is a project description in accordance with the General Requirements found in Imperial County's Title 9 Land Use Ordinance, Division 24, Section 92404.1.

Section 92404.1 GENERAL REQUIREMENTS

- A. 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.*

The zoning designation for APN: 021-073-077-000 is M-1, Light Industrial. Per Title 9, Division 5, Chapter 15, Section 90515.02, Communication Towers are a permitted use with a Conditional Use Permit.

- B. 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 Title 9.*

An application for a Conditional Use Permit has been submitted to Imperial County Planning and Developments Services and the Planning Commission Hearing is scheduled for October 27, 2021.

- C. Building Permit Required. *All communication facilities shall require a building permit issued by the County of Imperial.*

AT&T intends to apply for a building permit as soon as the Conditional Use Permit is granted.

- D. 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.*

The proposed communication tower is a ground-mounted monopole and screened off from view along E. Main St. by the existing building on the site.

- E. Height. *All communication facilities shall conform to the following height requirements:*
1. *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 4 and the required height is 80 feet, then the allowed height of the facility would be 110 feet and if it is 5 co-locators, then it would be 120 feet).

The proposed monopole is 40 ft. tall with 48 in. diameter antenna at 35 ft. above the ground plane.

2. All communication facilities constructed within 3/4 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.

The site in Niland, CA is more than .75 miles from the nearest designated scenic corridor.

3. Outside of the 3/4-mile range of a designated scenic corridor, communication facility, except an exempt facility, may exceed 120 feet. A bonus of 20 additional feet per facility, up to a maximum height of 300 feet, is permissible for operators co-locating on a single facility.

The proposed height for the monopole is 40 ft. maximum.

4. No roof-mounted wireless communication facility, except an exempt facility, may be more than 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.

The proposed monopole is ground-mounted.

5. If an operator wishes to apply for an exception to these height limitations, then the facility shall be subject to the provisions at Title 9 relating to conditional use permits and variances hearing processes.

No exceptions are proposed with regard to the monopole design and use.

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

1. 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.

The proposed monopole is placed in the rear yard and shall be screened by the existing building along E. Main Street. Existing vegetation on neighboring parcels also screen the view from Commercial Ave.

2. The projection of structure-mounted antennas from the face of the structure to which they are attached shall be minimized.

The proposed monopole is ground-mounted. The antenna shall project no more than 48 in. from the center line of the monopole.

3. Roof-mounted antennas shall be set back from the edge of the roof a distance greater than or equal to the height of the antenna, except when the antennas are fully screened. For roof-mounted antennas, a screening structure that is architecturally compatible with the building on which it is mounted may also be required as a condition of approval. Antenna panels mounted flush on the outside of the parapet wall of an existing building and painted to match the exterior of the building may be allowed.

The proposed monopole is ground-mounted.

- G. 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.*

Radio-frequency exposure does not provide a potential threat to public health. RF calculations are provided for the antenna proposed at the Niland site and are part of the CUP documents.

- H. 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).*

Cable trays are part of the project scope and routed to existing wall penetrations at the south elevation of the existing building on the site. The cable trays and supporting structure shall be galvanized steel.

- I. 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.*

The proposed monopole shall be galvanized steel. Lighting is not required per FAA calculations and guidelines.

- J. Noise. All communication facilities shall be designed to minimize noise. If a facility is located in or within 100 feet of a residential zone, noise attenuation measures shall be included to reduce noise levels to a maximum exterior noise level of 50 Ldn at the facility site's property lines.*

The proposed monopole is a passive structure. All operating equipment shall be located in the interior of the existing building at the site.

- K. 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. 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.

All accessory equipment shall be located in the interior of the existing building at the site. The site is accessible from the north on E. Main Street and by the west on an adjacent unpaved alley.

- M. 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 Ordinance.*

The proposed monopole is not designed to allow co-location. It is intended for the sole purpose of extending ethernet service to the US DOD SOF Desert Training Facility to the north of the site.

- N. Removal Upon Discontinuation of Use. *All equipment associated with a communication facility shall be removed within 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.*

AT&T is committed to working with Imperial County in the event that the proposed monopole becomes inoperable and/or damaged. The area of work shall be restored to the original condition if removal of the monopole and foundation slab become necessary.

- O. 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.*

The proposed monopole is an accessory use to the site. All operating equipment is within the interior of the existing building. The monopole is intended to extend ethernet service to the US DOD SOF Desert Training Facility to the north of the site.

- P. 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.*

The site area is 7,800 square feet. The side yard setback for zoning M-1, Light Industrial is 0 ft. The proposed monopole is 17'-0" clear to the East property line and 29'-4" clear to the nearest structure on the adjacent property.

- Q. 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 Ordinance 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.

AT&T maintains and operates two (2) existing communications towers in Imperial County:

1. The Superstition tower is approximately 28 miles to the southwest of Niland and is 83 ft. tall at 545 ft. above sea level. The location of this tower is within the boundaries of a designated US Naval Reservation.
2. The El Centro tower is approximately 31 miles to the south of Niland and is 104 ft. tall at 43 ft. below sea level. The location of this tower is within the city limits of El Cento, CA.

- R. *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.*

The proposed monopole shall have a galvanized steel finish. The antenna color shall be white or gray. These colors often provide the least visual impact when viewed from a distance. Photo-simulations have been conducted and provided as part of the CUP documents.

- 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.*

The proposed monopole is located behind the existing building in the rear yard to limit the visual impact. Additional screening to the public way is provided by existing vegetation and buildings on neighboring parcels.

- 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.*

A single antenna shall be mounted to the monopole and will be either white or gray in color. The monopole shall have a galvanized steel finish.

- S. *Lighting.* *Towers shall not 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.*

The proposed monopole and antenna shall not be lit. FAA does not require artificial lighting for this type of structure and height.

- T. *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 Ordinance 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.*

The proposed monopole design is not subject to FAA/FCC notification protocols. A Federal Airways and Airspace Summary Report is included with the CUP documents.

- U. **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 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 said thirty (30) days shall constitute grounds for the removal of the tower or antenna at the owner's expense.*

The proposed monopole and structural slab have been designed by a licensed engineer. Stamped structural drawings and calculations shall be provided to the building department as part of the permit documents.

- V. **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 Title 9 for the respective base zone.*

For zone M-1, Light Industrial, the minimum required setbacks are:

Front: 10'-0"

Side: 0'-0"

Rear: 0'-0"

The proposed monopole is located in the rear yard, 17'-0" clear to the nearest side property line and 84'-6" to the rear property line.

- W. **Not Essential Services.** *Towers and antennas shall be regulated and permitted pursuant to this Ordinance and shall not be regulated or permitted as essential services, public utilities or private utilities.*

The proposed tower extends an existing ethernet service to the US DOD SOF Desert Training Facility currently in construction.

- X. **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.*

AT&T is the current owner and operator of their central office facility in Niland, CA. This central office provides existing communication services to the region and will not be impacted by the proposed monopole. A copy of AT&T's franchise license for California shall be provided to the Planning Director, as necessary.

- Y. **Public Notice.** *For purposes of this Ordinance, 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 Title 9, in addition to any notice otherwise required by the Planning Director.*

AT&T has no exceptions to the required public notice requirement and will work with the public to address any concerns.

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

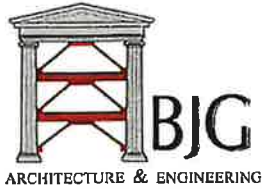
No signs are proposed to be placed on the monopole structure and antenna.

- AA. Buildings and Support Equipment. *Buildings and support equipment associated with antennas or towers shall comply with requirements of Title 9.*

All support equipment for the proposed monopole shall be located within the interior of the existing building. No modifications are proposed the existing building envelope.

- BB. 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.*

The proposed monopole is intended to extend the existing ethernet service to the US DOD SOF Desert Training Facility. Any additional towers planned for the Niland/Imperial County region shall be pursued under a separate permit application. There are no immediate plans for additional communications towers within Imperial County this time.



RECEIVED

SFP 27 2021

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

September 23, 2021

I.C. Planning and Development Services Dept.
801 Main Street
El Centro, CA 92243

Re: CUP21-0009
BJG Project No. 20200064

Dear Ms. Ramos:

We offer the following updated and requested documents for consideration by the Planning Commission in the effort to approve CUP21-0009.

The documents included are:

1. Revised and updated Conditional Use Permit application
2. Response letter to CUP review comments
3. Supplemental documents in response to CUP review comments
 - a. Project Description
 - b. Title Report
 - c. Owner's authorization letter
 - d. Signed "Notice to Applicant" and "General Indemnification Agreement" forms
 - e. Radio Frequency exposure review calculations and verification forms
 - f. Letters prepared by AT&T Core Network Operations: Project Details, Niland Central Office, Imperial County
 - g. Dust Control Plan
 - h. Federal Airways and Airspace Summary Reports
4. Drawings, two (2) copies each:
 - a. Site Plan and Vicinity
 - b. Existing and Proposed Tower Inventory
 - c. Enlarged Plan, Elevations, and Details.

Thank you for your time and consideration of the Conditional Use Permit application.

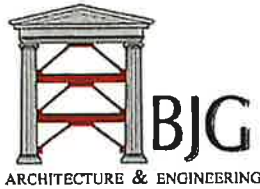
Sincerely,

BJG ARCHITECTURE & ENGINEERING

A handwritten signature in blue ink, appearing to read "Clifford H. Johnson", written over a light blue horizontal line.

Clifford H. Johnson, SE

Enclosures:
Application
Response Letter
Supplemental Documents
Drawing set, two (2) copies



RECEIVED

September 23, 2021

SFP 27 2021

Jeanine Ramos and Diana Robinson
ICPDS
801 Main St.
El Centro, CA 92243

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Re: CUP21-0009
BJG Project No. 20200064

Dear Ms. Ramos and Ms. Robinson:

We offer the following in response to the deemed complete letter dated May 18, 2021. Our responses to review comments from additional Imperial County authorities are also included.

A. Conditional Use Permit Application:

A1) Item #7 Property (site) Address- Please correct the listed address to the following: 313 E. Main St., Niland

Response: Please see the attached revised application with correct listed address.

A2) Currently the application was signed by a Daniel Redmond, Please complete the attached Owners Affidavit to allow Mr. Redmond to sign on the behalf of AT&T California d.b.a Pacific Bell.

Response: The owner indicated in the originally submitted application is incorrect. The correct owner is AT&T Corporate Real Estate (CRE) signed by Linda S. Rankin.

A3) Please have AT&T California d.b.a Pacific Bell provide an Owners Acknowledgement for this specific conditional use permit application.

Response: Please see the attached letter from AT&T CRE acknowledging BJB has permission to submit the conditional use permit application on behalf of AT&T and AT&T CRE.

A4) The application was submitted by Clifford H. Johnson, SE. Please clarify if Mr. Johnson will be representing this CUP application, and if so, please provide documentation that names Mr. Johnson as an Authorized Agent for AT&T California d.b.a Pacific Bell.

Response: Please see the attached letter from AT&T CRE stating that Clifford H. Johnson, SE is authorized to represent the CUP application on behalf of AT&T CRE.

B. Notice to Applicant of Fees- Please complete the attached Notice to Applicant of Fees

Response: Please see the attached Notice to Applicant of Fees.

C. General Indemnification Form- Please complete the attached General Indemnification of Form

Response: Please see the attached General Indemnification Form.

D. Preliminary Title Report- Please provide a preliminary title report for the proposed site

Response: Please see the attached "Preliminary Report" prepared by First American Title Insurance Company.

E. *Project Description- Please provide a project description for this CUP application that details how the proposed monopole will meet the General Requirements found in the Imperial County's Title 9 Land Use Ordinance, Division 24, Section 92404.01.*

Response: Please see the attached Project Description.

F. *Site Plan:*

E1) *Please provide the proposed lighting for the monopole*

Response: Please see the attached Federal Airways and Airspace Summary Reports. These reports indicate FAA/FCC notification is not required under FAA Rules Title 14 CFR Part 77.

FAA Rules Title 14 CFR Part 77 (Chapter 1)

• *This part establishes the requirements to provide notice to the FAA of certain proposed construction, or the alteration of existing structures; the standards used to determine obstructions to air navigation, and navigational and communication facilities; the process for aeronautical studies of obstructions to air navigation or navigational facilities to determine the effect on the safe and efficient use of navigable airspace, air navigation facilities or equipment; and the process to petition the FAA for discretionary review of determinations, revisions, and extensions of determinations.*

The report and site coordinates for the "Antenna Structure" correspond with the Niland location. The report and site coordinates for "Non-Antenna Structure" correspond with the Chocolate Mountain Air Gunnery Range location.

E2) *Proposed finish of the monopole*

Response: The proposed finish is galvanized steel. Please see detail notes on revised Sheet A102: Enlarged Plan, Elevations, and Details.

E3) *Per Section 92409.01, please provide a landscape plan showing specific landscape materials*

Response: Please see added landscape note on revised sheet A101: Site Plan. No new landscaping is proposed with this project scope.

G. *Radio-Frequency Exposure Review- Please provide a Radio Frequency Environmental Evaluation Report based on the requirements found in Section 92408.00 in the above-mentioned ordinance.*

Response: Please see attached Radio-Frequency calculations and RF Exposure Verification forms prepared by AT&T. The site name "SOF Navy Base" refers to the tower in construction at the Chocolate Mountain Air Gunnery Range. The site name "Niland" refers to the proposed tower at 313 E. Main St., Niland, CA.

H. *Provisions for Future Co-location- Please clarify if the proposed monopole will allow for future co-location. If not, please provide the following per Section 92404.01 of Division 24 which states, "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 Ordinance".*

G1) *If the proposed monopole will allow for colocation, per Section 92409.01 please provide, "A notarized statement by the applicant as to whether the construction of the tower will accommodate the collocation of additional antennas for future users".*

Response: Please see attached letter from AT&T Core Network Operations "Niland Central Office" explaining the intended use of the proposed monopole. Co-location is not planned for the proposed monopole.

I. *Inventory of Existing Sites- Per Section 92404.01, "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". Please provide a hard copy of this inventory list to the ICPDS Department.*
H1) Additionally, per Section 92409.01 the separation distance from the towers described within the inventory list to the proposed monopole shall be shown on an updated site plan or map. The type of construction of the existing tower(s) and the owner/operator of the existing tower(s) will also be identified if known.

Response: Please see attached Inventory of Sites prepared by AT&T Core Network Operations "Imperial County". All listed tower sites are under the jurisdiction of AT&T Radio/OPS. Please see added sheet A101A: Existing and Proposed Tower Inventory for all wireline sites within Imperial County. Distances from each existing tower to the proposed monopole are noted.

J. *Alternatives Analysis- Per Section 92406.00 of Division 24 of the Title 9 Land Use Ordinance, "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". Please provide an Alternatives Analysis based on the requirements found in the abovementioned section to the ICPDS Department.*

Response: Please see the attached letter from AT&T Core Network Operations "Project Details" establishing the decision to locate the proposed monopole at the Niland AT&T Central Office.

The following is our response to APCD Comment Letter dated April 12, 2021:

*As the Project is described as involving "ground disturbance and excavations" it must adhere to **Regulation VIII** which is a collection of rules designed to limit emissions of fugitive dust (PM₁₀) to 20% opacity. The Project is located amid neighboring residences which the Air District considers sensitive receptors that could be adversely impacted by fugitive dust emissions. Therefore, although the property is under five acres the Air District requests that the applicant submit a **Construction Dust Control Plan** and notify the Air District 10 days prior to the start of construction. Should either the construction or operation phase of the Project include the use of a diesel generator above 50 brake horsepower the applicant will need to contact the Permitting & Engineering Division of the Air District to determine permitting requirements.*

Response: Please see attached dust control plan prepared by Tashjian Towers Corp.

The following is our response to IID Comment Letter dated April 21, 2021:

1. *To request electrical service for the proposed communication tower, the applicant should be advised to contract Ignacio Romo, IID Customer Project Development Planner...to initiate the customer service application process. In addition to submitting a formal application...the applicant will be required submit a complete set of approved project drawings (hard copy and in AutoCad file format), electrical one-line diagram, operating voltage requirement, electrical panel loads, size & location; construction schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of*

electrical service to the project. The applicants shall be responsible for all costs and mitigation measures related to providing electrical service to the project.

Response: No new electrical service is proposed for this project. Existing commercial power to the building will not be modified. The monopole itself is a passive device for the network extension.

2. *Distribution-rated electrical service 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 provisions of electrical service to the project shall be the financial responsibility of the applicant.*

Response: Noted. No new electrical service is proposed for this project. Existing commercial power to the building will not be modified. The monopole itself is a passive device for the network extension.

3. *The applicant will need to abide by the following IID electrical tower service guidelines:*
- IID will allow only one metering point per site. If more than one meter is requested, the customer must utilize a multi-meter pack.*
 - For single-phase service from a pole-mounted transformer the total service capacity shall not exceed 600 amps (e.g. six (6) 100 amp panels or three (3) 200 amp panels). Maximum transformer size is a 100kVA, 120/240V.*
 - For single-phase service from a pad-mounted transformer, the total service capacity shall not exceed 800 amps. Maximum transformer size is a 167kVA, 120/240V.*
 - Services exceeding 800 amps of total capacity must be served from a three-phase pad-mounted transformer rated at 120/208V. Please note that the load must be balanced across the phases.*

Response: Noted. No new electrical service is proposed for this project. Existing commercial power to the building will not be modified. The monopole itself is a passive device for the network extension.

4. *Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvement such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances)...The IID Real Estate Section should be contacted...for additional information regarding encroachment permits or agreements.*

Response: Noted. No new work is proposed on existing right-of-way easements. All work shall occur within the property line boundary for APN: 021-073-007-000.

5. *Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to the electrical utility substations, electrical transmission and distribution lines, canals, drain, 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 such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.***

Response: Will comply. No new work is proposed to IID facilities. The proposed monopole and antenna do not disturb existing electrical lines to the existing building.

The following is our response to IVECA comment Letter dated April 22, 2021:

Future IVECA or Imperial County communication needs could necessitate space on the proposed 40-foot monopole and other related on-site infrastructure. The project's location is quite desirable for communication system enhancements that has the potential to benefit an under-served area of Imperial County. We therefore are respectfully requesting a Local/Public Benefit Agreement with CUP #21-0009. We are hopeful for language favorable to IVECA for future communication system additions in perpetuity in said CUP. This would include, but not limited to, multiple antenna spaces, guaranteed antenna heights, and shelter space all at no cost to Imperial County or IVECA. It is obvious that the best interest of Imperial County, first responders, and the public at large are best served with the inclusion of a Local/Public Benefit Agreement.

Response: The proposed monopole is funded by the US DOD for critical Network Infrastructure required to operate their updated facility. It was sized and specified for this single use case. Even though there are already large towers nearby, these existing towers do not have proper look angles to the US DOD SOF Desert Warfare Training Facility for AT&T collocation. AT&T cannot collocate on the proposed tower. Please see attached letter from AT&T Core Network Operations "Niland Central Office" explaining the intended use of the proposed monopole.

The following is our response to Department of Public Works email dated July 2, 2021:

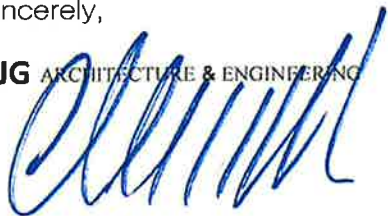
The way the structures on the lots are oriented is opposite to the way the lots are oriented on the creating map. For that reason, I am keenly interested in a title report. Hopefully a PTR would disclose a reason for the change in lot configurations. Without any insight, it looks like the existing block ATT building is located on two different lots (at least partially). This may require a lot line adjustment or a different remedy before a monopole antennae could be constructed (on someone else's property). Please forward a title report once received.

Response: Please see the attached Preliminary Title Report prepared by First American Title Insurance Company.

Thank you for taking time to review the attached documents. Please respond with any questions or comments.

Sincerely,

BJG ARCHITECTURE & ENGINEERING



Clifford H. Johnson SE

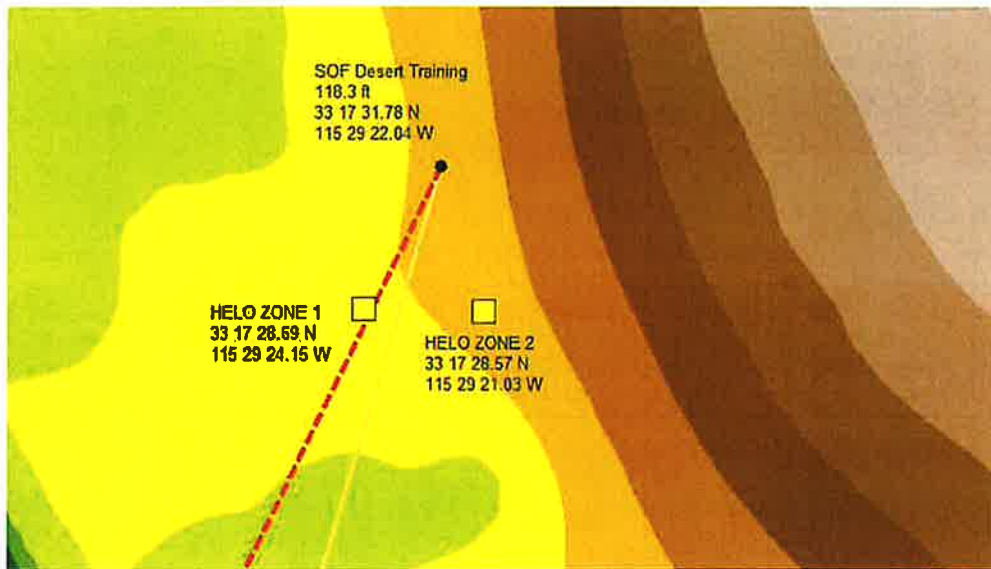
Project Details

AT&T Wireline

The US Navy requires enhanced services to the Navy Base that conducts Special Operations Desert Training north of Niland, CA.

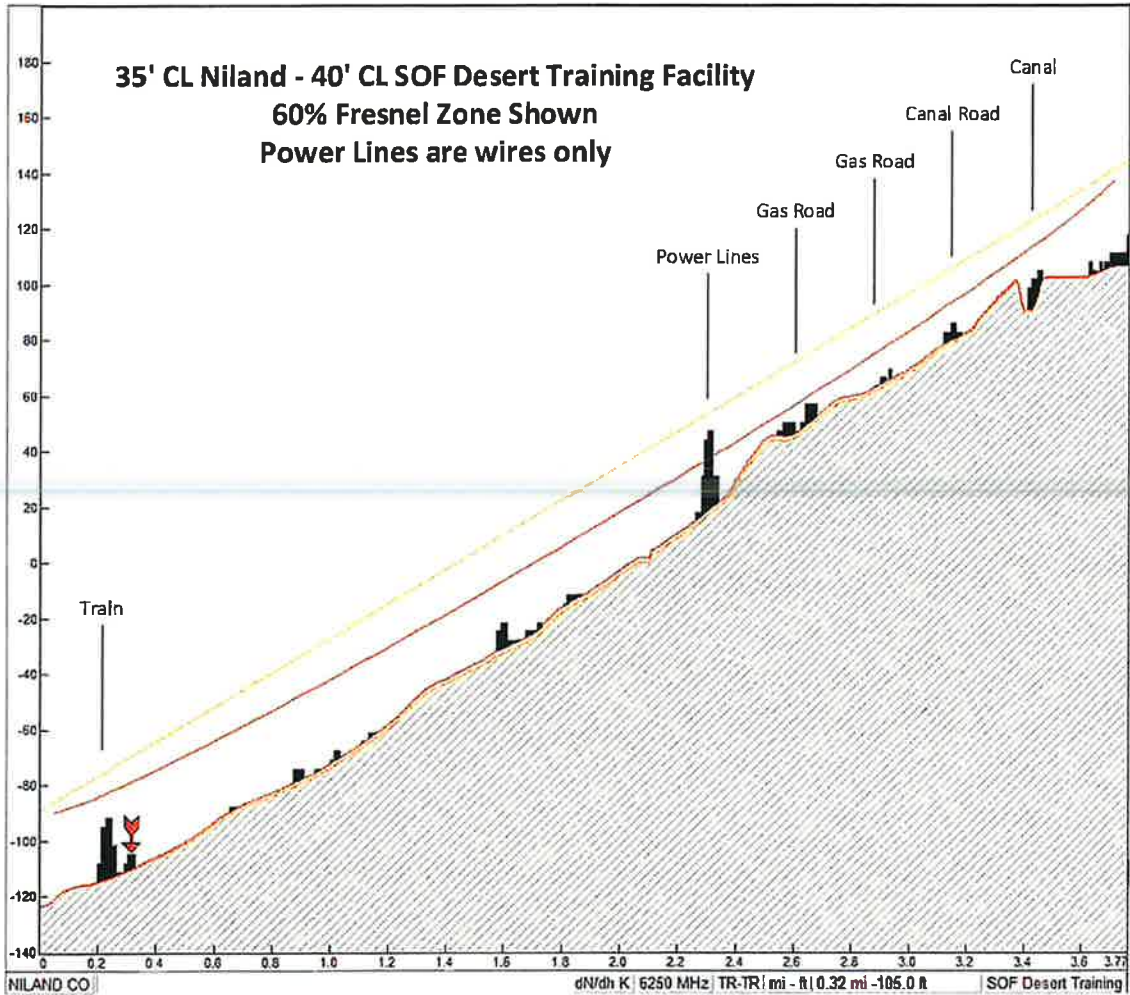
This solution required a secure connection to our Core Network that we could guarantee access and maintenance on during the event of any system malfunction. This base and the facilities that will ride on the new microwave path are vital to the Base Operations. The only existing tower in the area would result in interference from the helicopter ingress/egress operations at the site. For these reasons, a new monopole was proposed on the existing Niland AT&T Central Office footprint.

Figure 1: The dotted red line is to the only nearby tower in Niland and the surrounding area with fiber connectivity. The yellow line is to the new proposed Monopoles. Helicopters fly into Z1 from the west and leave the same way. Helicopters for Z2 fly in from the East and leave the same way.



Building the proposed Monopole is the only way to meet the project needs and ensuring secure direct connectivity to the Core Network.

Figure 2: The Elevation Profile showing the difficulty in placing fiber due to railroad, water channel, gas pipelines, and road crossings.



Dan Redmond
RF Engineering
916.296.0282



Niland Central Office

AT&T Monopole Project to serve US Navy SOF Desert Training Base.

To whom it may concern, the monopole being proposed behind the AT&T Central Office at 313 E. Main Street, Niland, CA, will have a sole purpose of feeding service to the US Navy Base. It is a traditional AT&T Wireline application and there is no intent nor interest in expanding this monopole to allow for Cellular systems from AT&T Mobility or competitors. Any effort to do so would be from one of the cellular providers and would be considered a new project with new permits required. This Monopole is strictly intended for the single use-case for the US Navy.

Sincerely,

A handwritten signature in black ink, appearing to read "D Redmond", with a stylized flourish at the end.

Dan Redmond
RF Engineering
916.296.0282

Aerial photograph showing the viewpoints for the photosimulations.

AT & T Niland / SOF
315 E Main St
Niland, CA 92757



1



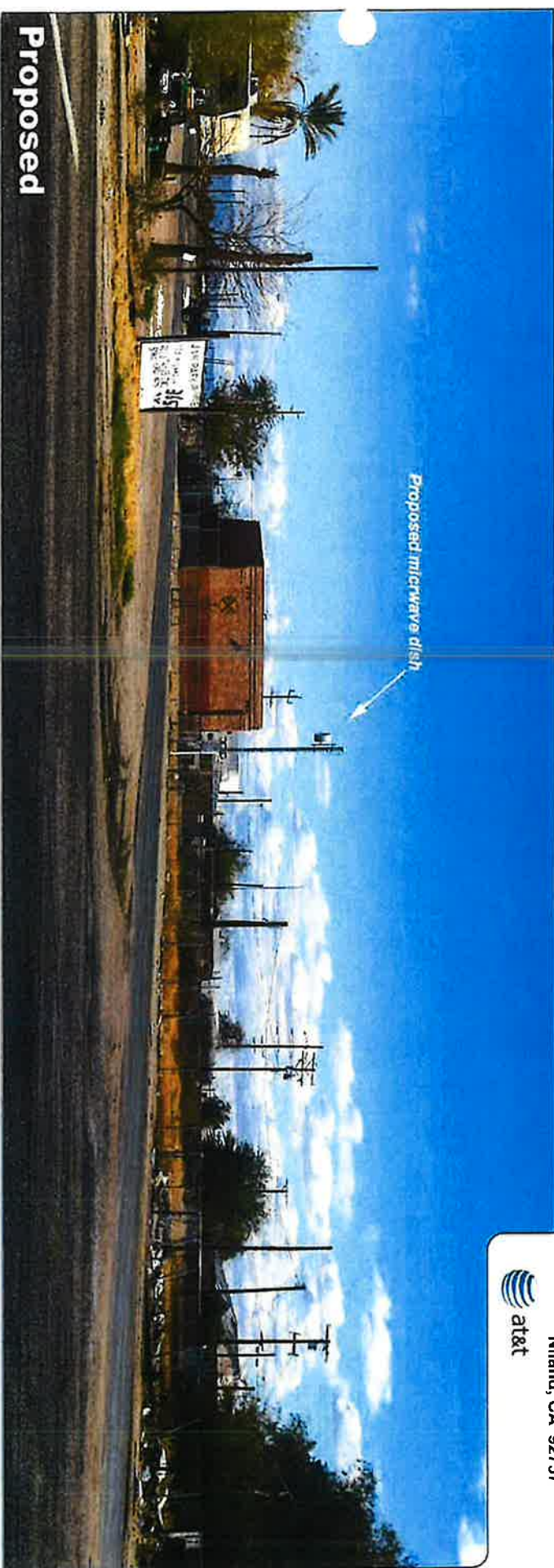
Existing

Photosimulation of the view looking southeast from Niland Ave across Main St.

AT&T Niland / SOF
315 E Main St
Niland, CA 92757



Proposed microwave dish



Proposed

2



Photomontage of the view looking west along Main Street at the railroad tracks.

AT&T Niland / SOF
315 E Main St
Niland, CA 92757



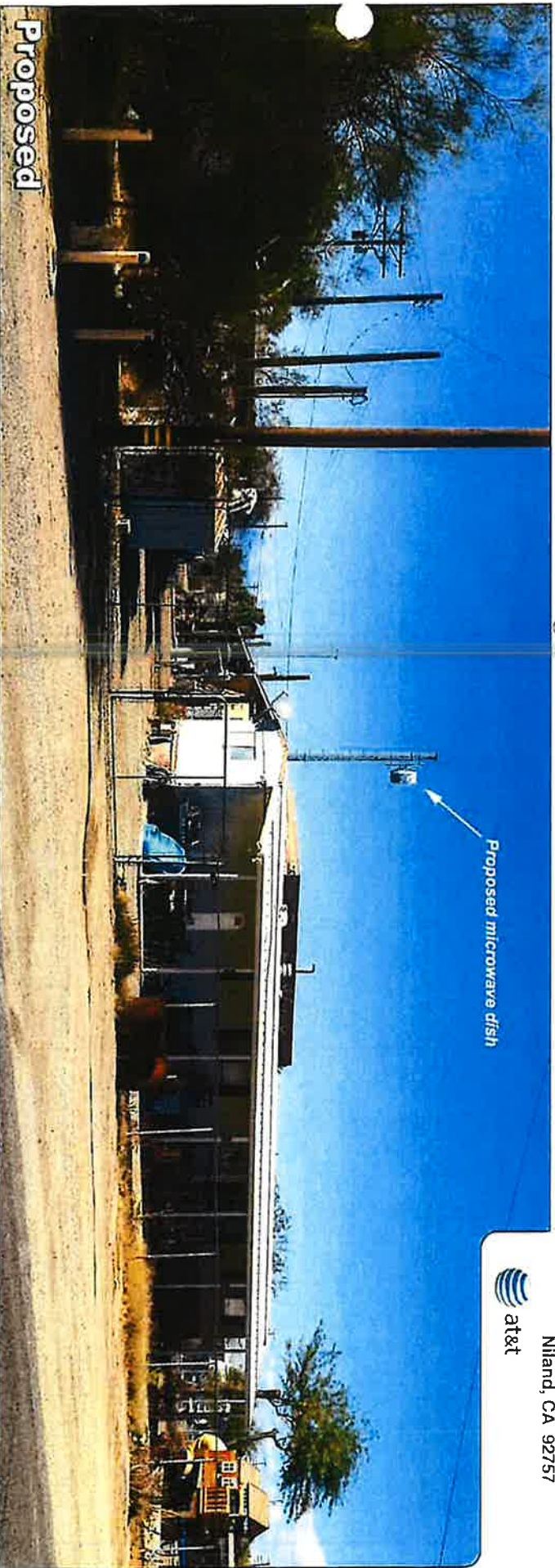



3

Existing

Photosimulation of the view looking northwest from Commercial Ave.

AT&T Niland / SOF
315 E Main St
Niland, CA 92757



Proposed

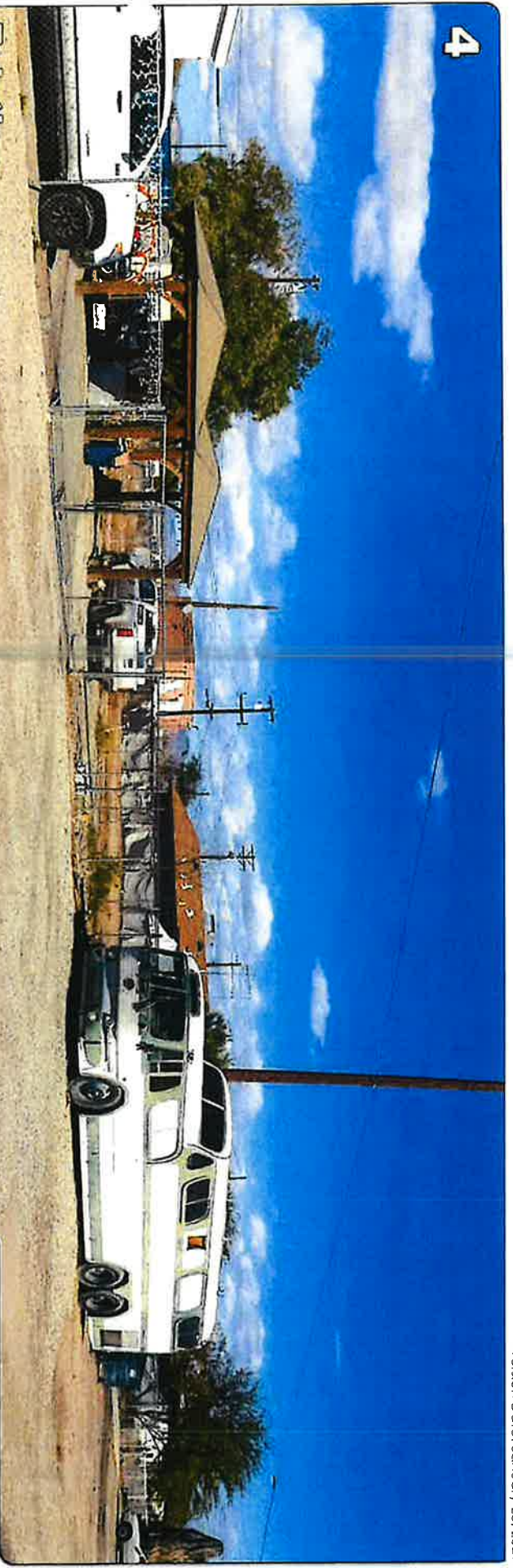
Proposed microwave dish

© Copyright 2021 PhotoSimulations, Inc. • www.photosim.com • Any modifications to this rendering are the property of PhotoSimulations, Inc. This photosimulation is based upon information provided by the project consultant.


4

Existing

Photosimulation of the view looking northeast from 3rd Street.



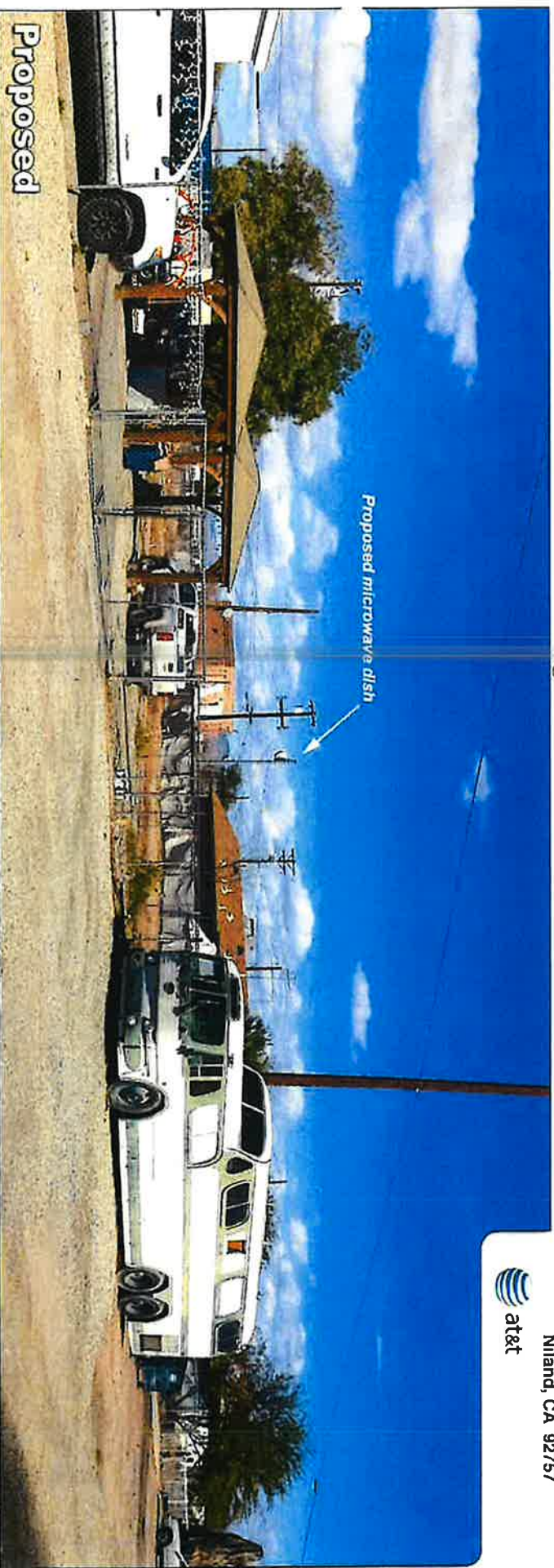
AT&T Niland / SOF
315 E Main St
Niland, CA 92757



Proposed microwave dish



Proposed



NEPA RF Exposure Verification

NEPA-RFSE Job Aid

Certification Type:	Microwave	Method of Evaluation:	
	RAN	<input type="radio"/> Categorical Exclusion	
Market Name:	Wireline	<input type="radio"/> Roofview	
Site ID:	SOF NAVY BASE	<input type="radio"/> 3rd Party Vendor	
Site Name:	SOF NAVY BASE		
USID:			
FA Code:			
Structure Type:	Self Support	<input checked="" type="radio"/> MPE Calculator	
Antenna Bottom Tip Height from Ground Level:	37.5	MPE Analysis User:	dr7282
RF Safety Mitigation Required?	No	MPE Analysis Date:	3/8/21
		<input type="radio"/> IBWAVE (IDAS)	

Required Signature of Market RF Safety Engineer or Network Deployment Manager

This site will be constructed/modified in compliance with FCC RF exposure regulations applicable to the general public. Specifically, this site will either qualify for a categorical exclusion from routine evaluation and/or will be constructed to comply with the FCC's maximum permissible exposure rules. Documentation supporting this certification will be created, maintained, and available upon request.

Certified By:

Name:

Signature:

Date:

Dan Redmond

Dan Redmond

3/8/21

MICROWAVE EXPOSURE SAFETY ANALYSIS: MULTIPLE RADIOS INTO SINGLE ANTENNA

INPUTS	
Enter inputs into yellow fields below	
ANTENNA INPUTS:	
Diameter (ft)	3
Frequency Band Center (GHz)	6.3
Gain (dBi)	33.2
Beamwidth (deg)	3
RADIO INPUTS:	
1. If a Radio is not used, enter 0 for power input	
2. Complete entries for all 4 Radios	
Radio	Power into Antenna Input Port (W)
Radio 1	0.8
Radio 2	0.8
Radio 3	0
Radio 4	0

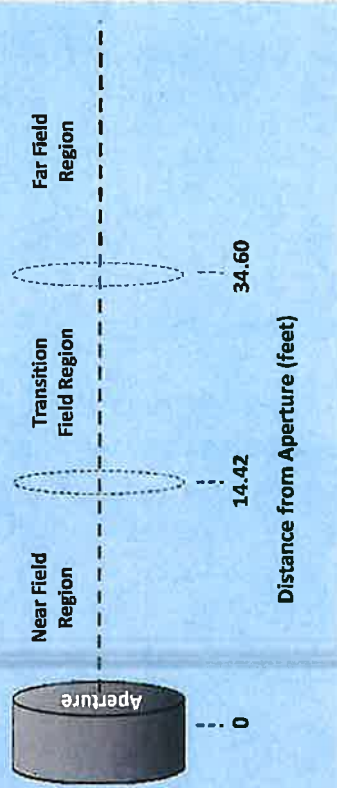
OUTPUTS		COMMENTS ABOUT OUTPUT	
Guidance for collecting inputs is provided in the "MW Data of Calculator" sheet			
Composite Maximum On-Axis % GP MPE in each Exposure Region			
	Near Field	Transition	Far-Field
Exposures for Radio 1 Alone	27.92	27.92	11.96
Composite Exposures: Radios 1 + 2	55.83	55.83	23.92
	0.00	0.00	0.00
	0.00	0.00	0.00

Outputs in first row are the exposures produced by Radio 1 alone.
 Outputs in second row are the composite exposures of Radio 1 and Radio 2, etc.

GREEN fill in a cell indicates compliance for the associated region.
 RED fill indicates possible non-compliance and that need for remediation for the affected region must be examined. For example, if one or more of the 6 cumulative exposures calculated in the "Aperture" column were RED, the need for remediation in the Aperture region would need to be considered.

Notes:

- The exposure levels calculated are the maximum predicted to exist in each of the regions.
- Antennas mounted with bottom tips 20 feet or more above areas accessible to the general population are considered compliant.
- Antennas mounted over the parapets of, e.g., rooftops so that their apertures are not accessible to the general population are considered compliant.
- Consult the Microwave Job Aid for further guidance.



NEPA RF Exposure Verification

NEPA-RFSE Job Aid

Certification Type:	Microwave	Method of Evaluation:	<input type="radio"/> Categorical Exclusion
	RAN		<input type="radio"/> Roofview
Market Name:	Wireline		
Site ID:	NILDCA11		
Site Name:	Niland		
USID:		<input type="radio"/> 3rd Party Vendor	
FA Code:			
Structure Type:	Self Support	<input checked="" type="radio"/> MPE Calculator	
Antenna Bottom Tip Height from Ground Level:	33	MPE Analysis User:	dr7282
RF Safety Mitigation Required?	No	MPE Analysis Date:	3/10/21
		<input type="radio"/> iBWAIVE (IDAS)	

Required Signature of Market RF Safety Engineer or Network Deployment Manager

This site will be constructed/modified in compliance with FCC RF exposure regulations applicable to the general public. Specifically, this site will either qualify for a categorical exclusion from routine evaluation and/or will be constructed to comply with the FCC's maximum permissible exposure rules. Documentation supporting this certification will be created, maintained, and available upon request.

Certified By:

Name:

Dan Redmond

Signature:

Dan Redmond

Date:

3/10/21

MICROWAVE EXPOSURE SAFETY ANALYSIS: MULTIPLE RADIOS INTO SINGLE ANTENNA

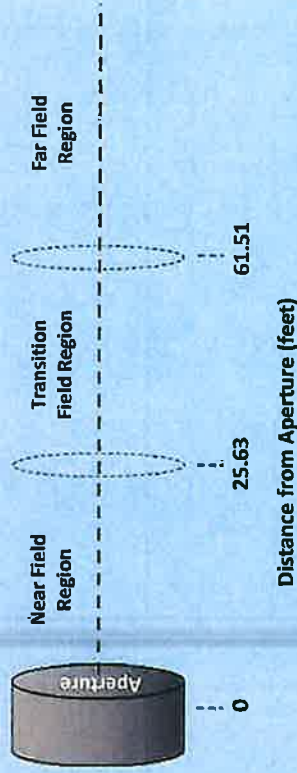
INPUTS		OUTPUTS	COMMENTS ABOUT OUTPUT
Enter inputs into yellow fields below			
ANTENNA INPUTS:			
Diameter (ft)	4		
Frequency Band Center (GHz)	6.3		
Gain (dbi)	34.5		
Beamwidth (deg)	2.8		
RADIO INPUTS:			
1. If a Radio is not used, enter 0 for power input			
2. Complete entries for all 4 Radios			
Radio	Power into Antenna Input Port (W)	Far-Field	
Radio 1	0.8	5.10	Exposures for Radio 1 Alone
Radio 2	0.8	23.83	Composite Exposures: Radios 1 + 2
Radio 3	0	0.00	
Radio 4	0	0.00	

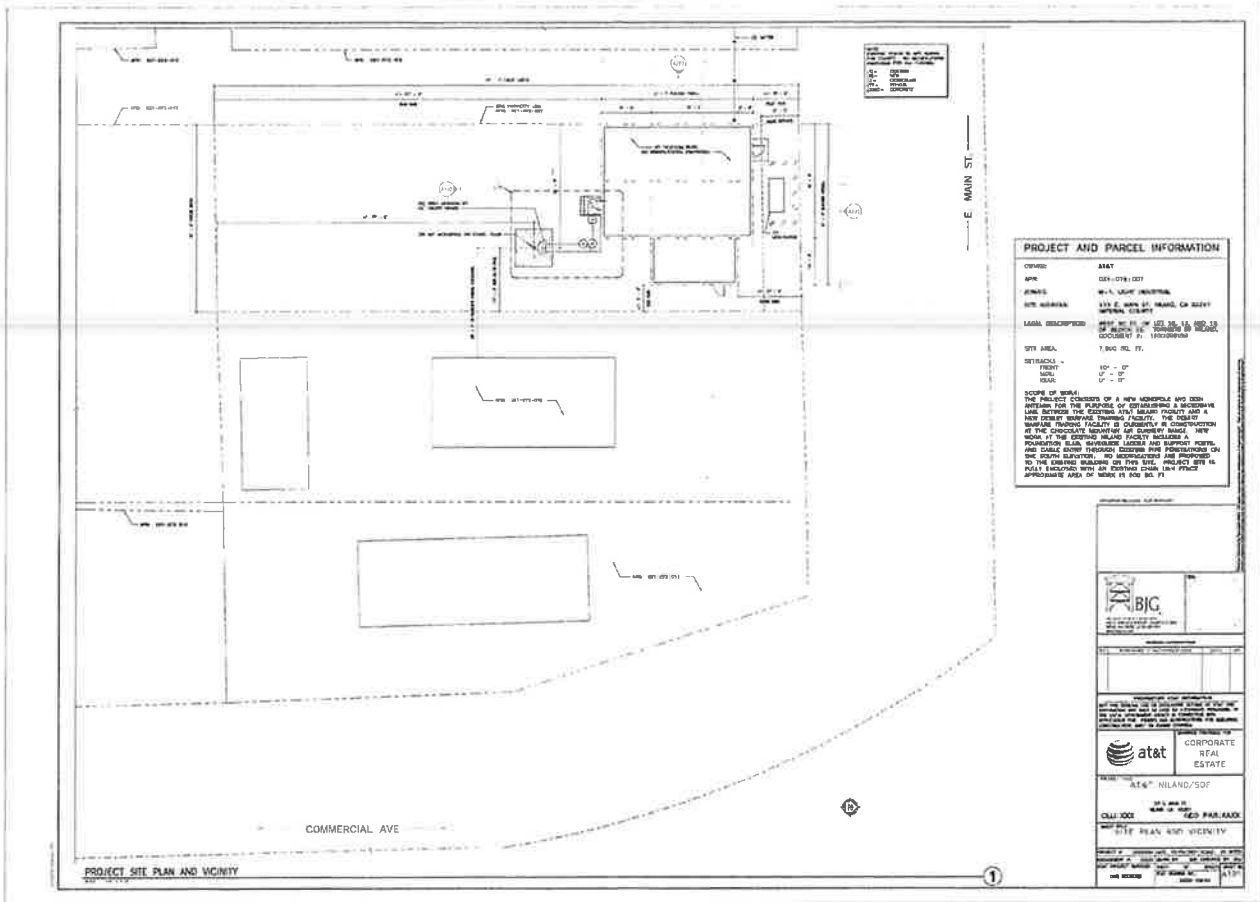
Guidance for collecting inputs is provided in the "MW Data of Calculator" sheet

GREEN fill in a cell indicates compliance for the associated region.
 RED fill indicates possible non-compliance and that need for remediation for the affected region must be examined. For example, if one or more of the 6 cumulative exposures calculated in the "Aperture" column were RED, the need for remediation in the Aperture region would need to be considered.

Notes:

1. The exposure levels calculated are the maximum predicted to exist in each of the regions.
2. Antennas mounted with bottom tips 20 feet or more above areas accessible to the general population are considered compliant.
3. Antennas mounted over the parapets of, e.g., rooftops so that their apertures are not accessible to the general population are considered compliant.
4. Consult the Microwave Job Aid for further guidance.





PROJECT AND PARCEL INFORMATION

OWNER: AMAT
 APR: CDA-1781-027
 JURISDICTION: SANTA CLARA COUNTY
 SITE ADDRESS: 155 E MAIN ST, SAN JOSE, CA 95131
 LOCAL JURISDICTION: CITY OF SAN JOSE, CA
 SITE AREA: 7,800 SQ. FT.
 DISTRICT: 100 - 100
 ZONE: U - 100
 MAP: 100 - 100

SCOPE OF WORK:
 THE PROJECT CONSISTS OF A NEW 100,000 SQ. FT. OFFICE BUILDING WITH AN ADJACENT 100,000 SQ. FT. GARAGE AND A 100,000 SQ. FT. PARKING FACILITY. THE PROJECT WILL BE CONSTRUCTED IN PHASES. PHASE 1 WILL INCLUDE THE GARAGE AND 50% OF THE OFFICE BUILDING. PHASE 2 WILL INCLUDE THE REMAINING 50% OF THE OFFICE BUILDING AND THE PARKING FACILITY. THE PROJECT WILL BE CONSTRUCTED IN PHASES. PHASE 1 WILL INCLUDE THE GARAGE AND 50% OF THE OFFICE BUILDING. PHASE 2 WILL INCLUDE THE REMAINING 50% OF THE OFFICE BUILDING AND THE PARKING FACILITY. THE PROJECT WILL BE CONSTRUCTED IN PHASES. PHASE 1 WILL INCLUDE THE GARAGE AND 50% OF THE OFFICE BUILDING. PHASE 2 WILL INCLUDE THE REMAINING 50% OF THE OFFICE BUILDING AND THE PARKING FACILITY.

Professional Engineer Seal and Stamp

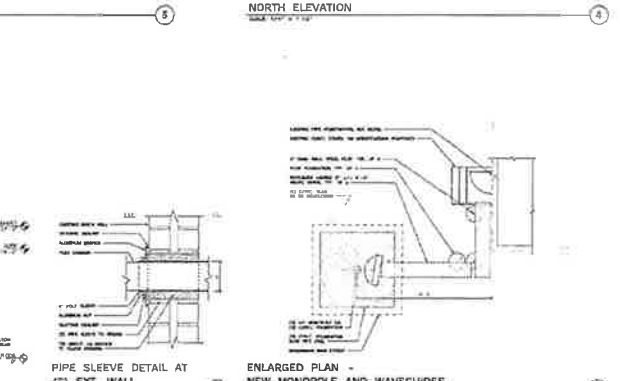
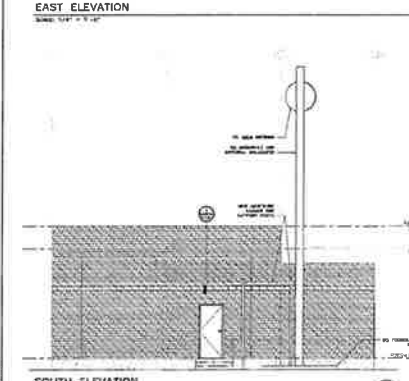
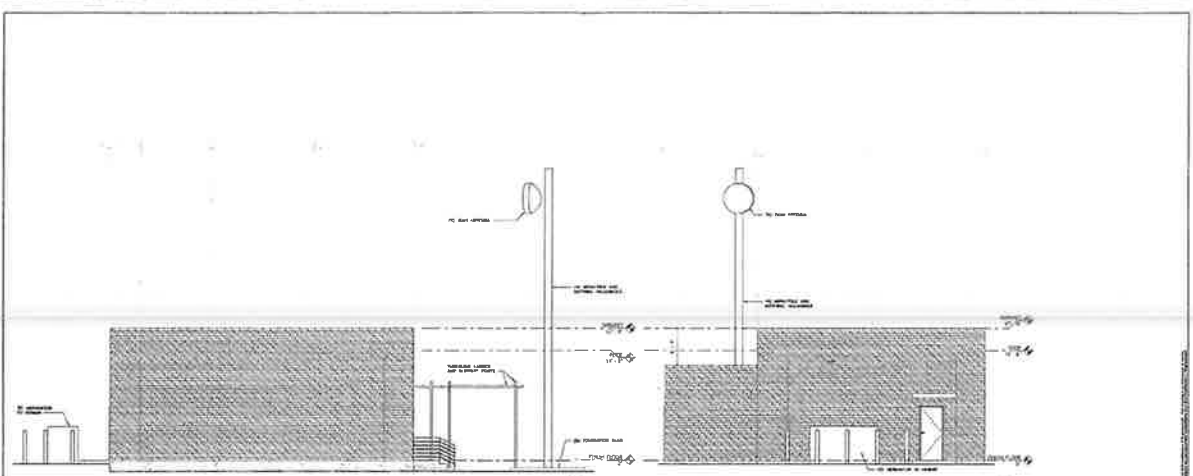
BIG
 BIRCH GROUP, INC.
 1000 BIRCH DRIVE, SUITE 200
 SAN JOSE, CA 95131
 (408) 434-1111
 www.big.com

Professional Engineer Seal and Stamp

at&t
 CORPORATE REAL ESTATE
 155 E MAIN ST
 SAN JOSE, CA 95131
 (408) 434-1111
 www.atandt.com

Professional Engineer Seal and Stamp

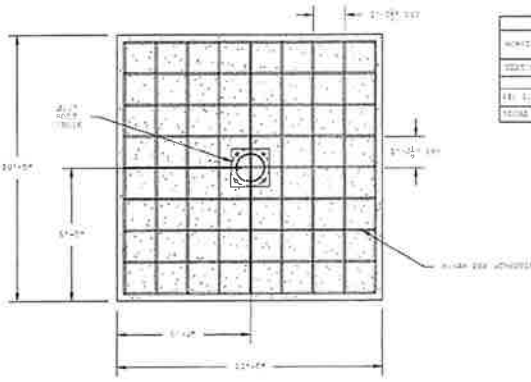
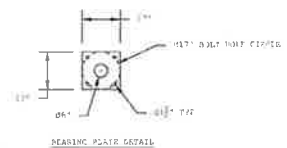
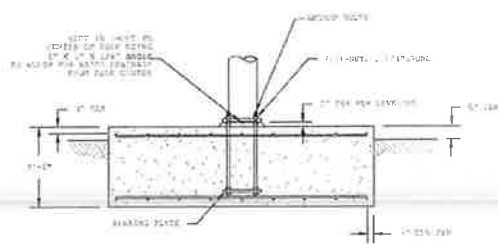
1



PROJECT: STAT NLAND-150P	
ARCHITECT: atat	
CONSULTING ENGINEER: GORDON & GORDON	
CONTRACTOR: STAT NLAND-150P	
DATE: 08/11/2011	
DRAWING NO.: 150P-01	
SHEET NO.: 1 OF 1	
SCALE: AS SHOWN	

8 7 6 5 4 3 2 1

1. ALL BRACK, ANCHOR BOLTS, BEARING PLATES AND OTHER FIXINGS OF THE FOUNDATION SHALL BE WELL SECURED FROM TOPOGRAPHY SURVEYS.
2. THE DATA SHEET SHALL BE REVIEWED FOR ANY OTHER CONSIDERATIONS IN SALEM ENGINEERING CONSULTANTS REPORT NO. S-220-0554.
3. THE BOTTOM OF THE EXCAVATION SHALL BE CLEAR AND FREE OF JUNK ETC. SAFETY PRECAUTIONS SHALL BE TAKEN TO PREVENT THE COLLAPSE OF THE WALLS OR WALLS TO BE REMOVED TO SAFE FOUNDATIONS.
4. THE EXISTING BRICK FOUNDATION AND REAR WALL ENGINEERING SHALL ALL BACKFILL REPLACED WITH NON EXPANSIVE ENGINEERED FILL MEETING THE REQUIREMENTS OF DESIGN. MINIMUM HEIGHT SHALL BE 9" IN REAR WALL. THE NON-EXPANSIVE ENGINEERING FILL TO BE MADE IN 12" LAYERS AND EACH LAYER COMPACTED TO NEAR 95% OF THE MAXIMUM DRY DENSITY AS DETERMINED BY ASTM D1557 METHOD B1071.
5. THE CONCRETE BEARING SHALL BE 12" X 12" X 12" WITH A MINIMUM WATER CEMENT RATIO OF 0.43 AND A MINIMUM COMPRESSIVE STRENGTH OF 4000 PSI. SHALL BE USED FOR CONCRETE IN CONTACT WITH MOISTURE. REBAR AND MAXIMUM AGGREGATE SIZE IS 1". THE REQUIREMENTS FOR EQUIPMENT AND REBAR DETAILING SHALL BE IN ACCORDANCE WITH AISC 318-14. ALL 3/4" REBAR SHALL HAVE SPREAD THROUGH REBAR.
6. REBAR TO CONFORM TO ASTM SPECIFICATION A615 GRADE 60. THE BENDING OF REBAR IS REQUIRED WITH THE EXCEPTION OF TACKLING THE REBAR. NO REBAR TACKLING IS REQUIRED.
7. ALL REBAR TO HAVE MINIMUM 3" CONCRETE COVER.
8. ALL EXISTING CONCRETE SHALL BE RECONSTRUCTED.
9. THE BOTTOM ANCHOR BOLT BEARING PLATE SHALL BE POSITIONED AS CLOSELY AS POSSIBLE TO THE BOTTOM OF THE ANCHOR BOLTS.



REBAR SPECIFICATIONS	
REBAR TYPE	ASTM A615 GRADE 60 REBAR
REBAR SIZE	3/4\"
REBAR SPACING	12\"
REBAR COVER	3\"
REBAR DEVELOPMENT LENGTH	48\"



PROJECT NO.	10384
CLIENT	AT&T NILDAND
DESCRIPTION	MONOPOLE FOUNDATION
DATE	S-2

8 7 6 5 4 3 2 1

Attachment J: Comment Letters



IID

A century of service.

www.iid.com

Since 1911

September 21, 2021

Ms. Jeanine Ramos
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: NOI for the Preparation of an ND for the AT&T Telecom Facility Project, CUP
Application No. 21-0009

Dear Ms. Ramos:

On this date, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, the Notice of Intent for the preparation of a Negative Declaration for the AT&T telecom facility project, Conditional Use Permit application no. 21-0009. The applicant, AT&T dba Pacific Telephone & Telegraph Co., is proposing the installation of a 40 ft. monopole telecommunications tower at 313 E. Main Street, Niland, California (APN 021-073-007-000) to extend service to the US DOD Special Operations Forces Desert Warfare Training Facility.

The IID has reviewed the project information and found that the comments provided in the April 21, 2021 district letter (see attached letter) continue to apply.

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

Respectfully,

Donald Vargas
Compliance Administrator II

RECEIVED

SEP 20 2021

**IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES**

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Constance Bergmark – Mgr. of Planning & Eng./Chief Elect. Engineer, Energy Dept.
Jamie Asbury – Assoc. General Counsel
Vance Taylor – Asst. General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.



IID

A century of service.

www.iid.com

Since 1911

April 21, 2021

Ms. Joanino Ramos
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: AT&T Telecom Facility Project; CUP Application No. 21-0009

Dear Ms. Ramos:

On April 7, 2021, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on Conditional Use Permit application no. 21-0009. The applicant, AT&T dba Pacific Telephone & Telegraph Co., is proposing the installation of a 40 ft. monopole telecommunications tower at 313 E. Main Street, Niland, California (APN 021-073-007-000) to extend service to the US DOD Special Operations Forces Desert Warfare Training Facility.

The Imperial Irrigation District has reviewed the information and has the following comments:

1. To request electrical service for the proposed communication tower, the applicant should be advised to contact Ignacio Romo, IID Customer Project Development Planner, at (760) 482-3426 or e-mail Mr. Romo at igromo@iid.com to initiate the customer service application process. In addition to submitting a formal application (available for download at the district website <http://www.iid.com/home/showdocument?id=12923>), the applicant will be required submit a complete set of approved project drawings (hard copy and in AutoCad file format), electrical one-line diagram, operating voltage requirement, electrical panel loads, size & location; construction schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to the project. The applicants shall be responsible for all costs and mitigation measures related to providing electrical service to the project.
2. Distribution-rated electrical service is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.
3. The applicant will need to abide by the following IID electrical tower service guidelines:
 - a. IID will allow only one metering point per site. If more than one meter is requested, the customer must utilize a multi-meter pack.

Jeanine Ramos
April 21, 2021
Page 2

- b. For single-phase service from a pole-mounted transformer the total service capacity shall not exceed 600 amps (e.g. six (6) 100 amp panels or three (3) 200 amp panels). Maximum transformer size is a 100kVA, 120/240V.
 - c. For single-phase service from a pad-mounted transformer, the total service capacity shall not exceed 800 amps. Maximum transformer size is a 167kVA, 120/240V.
 - d. Services exceeding 800 amps of total capacity must be served from a three-phase pad-mounted transformer rated at 120/208V. Please note that load must be balanced across the phases.
3. Any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape; and all water, sewer, storm water, or any other above ground or underground utilities; will require an encroachment permit, or encroachment agreement (depending on the circumstances). The IID encroachment permit application and instructions are available at <https://www.iid.com/about-iid/department-directory/real-estate>. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.
4. Any new, relocated, modified or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, canals, drain, 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 such time as the environmental documentation is amended and environmental impacts are fully analyzed. **Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.**

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

Respectfully,



Donald Vargas
Compliance Administrator II

Enrique B. Martinez – General Manager
Mike Pacheco – Manager, Water Dept.
Marilyn Del Bosque Gilbert – Manager, Energy Dept.
Constance Bergmark – Mgr. of Planning & Eng./Chief Elect. Engineer, Energy Dept.
Jamil Asbury – Assoc. General Counsel
Vance Taylor – Asst. General Counsel
Michael P. Kemp – Superintendent, Regulatory & Environmental Compliance
Laura Cervantes, – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

Kimberly Noriega

From: Mario Salinas
Sent: Monday, September 20, 2021 4:02 PM
To: Kimberly Noriega; Jorge Perez
Cc: Michael Abraham; Jeanine Ramos; Diana Robinson; Carina Gomez; John Robb; Maria Scoville; Rosa Soto; Shannon Lizarraga; Valerie Grijalva
Subject: RE: Notice of Intent - AT&T California d.b.a. Pacific Bell CUP21-0009

Good afternoon Ms. Noriega,

If the property has an existing septic system, the applicant will need to undergo a plan review with our office. If the property is connected to city utilities, our division does not have any comments.

Thank you,

Mario Salinas, MBA

Environmental Health Compliance Specialist
Imperial County Public Health Department
Division of Environmental Health
797 Main Street Suite B, El Centro, CA 92243
mariosalinas@co.imperial.ca.us
Phone: (442) 265-1888
Fax: (442) 265-1903
www.icphd.org



RECEIVED

SEP 20 2021

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

From: Kimberly Noriega <KimberlyNoriega@co.imperial.ca.us>
Sent: September 20, 2021 3:46 PM
To: Carlos Ortiz <CarlosOrtiz@co.imperial.ca.us>; Sandra Mendivil <SandraMendivil@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Matt Dessert <MattDessert@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Ryan Kelley <RyanKelley@co.imperial.ca.us>; Vanessa Ramirez <VanessaRamirez@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Mario Salinas <MarioSalinas@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Robert Malek <RobertMalek@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>; Scott Sheppeard <scottsheppeard@icso.org>; Thomas Garcia <tgarcia@icso.org>; lynettevas@gmail.com; Vargas, Donald A <DVargas@IID.com>; mariaefroelich@yahoo.com; dkgodsey@hotmail.com; Alfredo Estrada Jr <AlfredoEstradaJr@co.imperial.ca.us>; EnergyDivisionCentralFiles@cpuc.ca.gov; pac@cpuc.ca.gov; scott.morgan@opr.ca.gov; Quechan Historic Preservation

Officer <historicpreservation@quechantribe.com>; Quechan Indian Tribe <tribalsecretary@quechantribe.com>; Thomas.tortez@torresmartinez-nsn.gov; Joseph.mirelez@torresmartinez-nsn.gov; katy.sanchez@nahc.ca.gov
Cc: Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Jeanine Ramos <JeanineRamos@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Carina Gomez <CarinaGomez@co.imperial.ca.us>; John Robb <JohnRobb@co.imperial.ca.us>; Maria Scoville <mariascoville@co.imperial.ca.us>; Rosa Soto <RosaSoto@co.imperial.ca.us>; Shannon Lizarraga <ShannonLizarraga@co.imperial.ca.us>; Valerie Grijalva <ValerieGrijalva@co.imperial.ca.us>

Subject: Notice of Intent - AT&T California d.b.a. Pacific Bell CUP21-0009

Good Morning Commenting Agencies,

In an effort to increase the efficiency at which information is distributed and reduce paper usage, please find attached Results Agenda, and Notice of Intent for Initial Study #21-0012 AT&T California d.b.a Pacific Bell.

Please feel free to view the EEC Original Hearing Package by clicking on the following link:

<https://www.icpds.com/hearings/environmental-evaluation-committee>

Should you have any questions regarding this project, please feel free to contact Jeanine Ramos, Planner I at (442)265-1750 or by email at JeanineRamos@co.imperial.ca.us

Thank you,

Kimberly Noriega

Office Assistant III

Imperial County
Planning and Development Services
801 Main St.
El Centro, CA 92243
☎ **Phone:** (442) 265-1736
☎ **Fax:** (442) 265-1735



The preceding e-mail message (including any attachments) contains information that may be confidential, be protected by the attorney-client or other applicable privileges, or constitute non-public information. It is intended to be conveyed only to the designated recipient(s). If you are not an intended recipient of this message, please notify the sender by replying to this message and then delete it from your system. Use, dissemination, distribution, or reproduction of this message by unintended recipients is not authorized and may be unlawful.

Kimberly Noriega

From: Quechan Historic Preservation Officer <historicpreservation@quechantribe.com>
Sent: Tuesday, September 21, 2021 7:51 AM
To: Kimberly Noriega
Cc: Jeanine Ramos
Subject: RE: Notice of Intent - AT&T California d.b.a. Pacific Bell CUP21-0009

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

This email is to inform you that we have no comments on this project.

From: Kimberly Noriega [mailto:KimberlyNoriega@co.imperial.ca.us]
Sent: Monday, September 20, 2021 3:46 PM
To: Carlos Ortiz; Sandra Mendivil; Jolene Dessert; Margo Sanchez; Matt Dessert; Monica Soucier; Ryan Kelley; Vanessa Ramirez; Jorge Perez; Jeff Lamoure; Alphonso Andrade; Mario Salinas; Robert Menvielle; Robert Malek; Andrew Loper; John Gay; Guillermo Mendoza; Scott Sheppard; Thomas Garcia; lynettevas@gmail.com; Vargas, Donald A; mariaefroelich@yahoo.com; dkgodsey@hotmail.com; Alfredo Estrada Jr; EnergyDivisionCentralFiles@cpuc.ca.gov; pac@cpuc.ca.gov; scott.morgan@opr.ca.gov; Quechan Historic Preservation Officer; Quechan Indian Tribe ; Thomas.tortez@torresmartinez-nsn.gov; Joseph.mirelez@torresmartinez-nsn.gov; katy.sanchez@nahc.ca.gov
Cc: Michael Abraham; Jeanine Ramos; Diana Robinson; Carina Gomez; John Robb; Maria Scoville; Rosa Soto; Shannon Lizarraga; Valerie Grijalva
Subject: Notice of Intent - AT&T California d.b.a. Pacific Bell CUP21-0009

Good Morning Commenting Agencies,

In an effort to increase the efficiency at which information is distributed and reduce paper usage, please find attached Results Agenda, and Notice of Intent for Initial Study #21-0012 AT&T California d.b.a Pacific Bell.

Please feel free to view the EEC Original Hearing Package by clicking on the following link:
<https://www.icpds.com/hearings/environmental-evaluation-committee>

Should you have any questions regarding this project, please feel free to contact Jeanine Ramos, Planner I at (442)265-1750 or by email at JeanineRamos@co.imperial.ca.us

Thank you,

Kimberly Noriega

Office Assistant III

Imperial County
Planning and Development Services
801 Main St.
El Centro, CA 92243
☎ Phone: (442) 265-1736

RECEIVED

SEP 21 2021

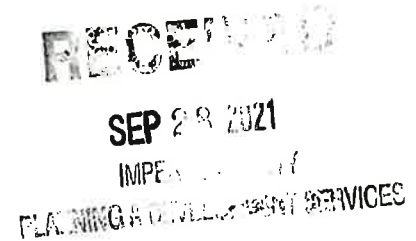
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

AIR POLLUTION CONTROL DISTRICT



September 28, 2021

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



SUBJECT: Notice of Intent for a Negative Declaration for Conditional Use Permit 21-0009—
AT&T California dba Pacific Bell Telecommunications Monopole

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") appreciates the opportunity to review and comment on Initial Study 21-0012 for Conditional Use Permit (CUP) 21-0009 regarding installation of a new 40-foot tall monopole, antenna and waveguide ("Project") to extend the telecommunication services of the United States Department of Defense (DoD) Special Operations Forces (SOF) Desert Warfare Training Facility. The Project is located at 313 East Main Street in Niland, also described as Assessor's Parcel Number 021-073-007-000.


The Air District requests a draft copy of the CUP prior to recording. Please note that previous comments requested submittal of a Construction Dust Control Plan (CDCP) **and** notification 10 days prior to the start of construction, rather than just submittal of a CDCP 10 days prior to the start of construction, as described in Section III (a)—Air Quality of the Environmental Evaluation Committee review packet.

Air District rules and regulations can be accessed online at <https://apcd.imperialcounty.org/rules-and-regulations>. Should you have questions please feel free to contact the Air District for assistance at (442) 265-1800.

Respectfully,


Curtis Blondell

APC Environmental Coordinator


Monica N. Soucier
APC Division Manager



Public Works works for the Public



COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

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

Follow Us:



www.facebook.com/ImperialCountyDPW/



<https://twitter.com/CountyDpw/>

November 02, 2021

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

Attention: Diana Robinson, Planner III

**SUBJECT: AT&T California d.b.a. Pacific Telephone & Telegraph Co.;
CUP 21-0009**
Located at 313 E Main Street, Niland, CA
APN's 021-073-007

Dear Mr. Minnick:

This letter is in response to your submittal received by this Department on April 7, 2021 for the above mentioned project. The Applicant proposes the installation of a new 40-foot tall monopole to extend the service of the US DOD SOF Desert Warfare Training Facility.

Department staff has reviewed the package information and the following comments shall be Conditions of Approval:

- The property where the monopole is proposed is comprised of the West 50 feet of three separate lots. The County should consider requiring a merger of the three units.

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

Respectfully,

John A. Gay, P.E.
Director of Public Works