

**TO: Planning Commission** 

AGENDA DATE: July 12, 2023

AGENDA TIME: 9:00am/ No.2

#### FROM: PLANNING & DEVELOPMENT SERVICES

KGBA AM PROJECT TYPE: Time Extension #23-0006 for CUP #07-0012 SUPERVISOR DIST #2 1251 Hwv 86 LOCATION: APNS: 054-130-069-000 El Centro. CA. 92243 PARCEL SIZE: +/- 176.57 GENERAL PLAN (existing) Agriculture GENERAL PLAN (proposed) N/A ZONE (existing) A-2 (General Agriculture) ZONE (proposed) N/A CONSISTENT INCONSISTENT MAY BE/FINDINGS GENERAL PLAN FINDINGS HEARING DATE: July 12, 2023 PLANNING COMMISSION DECISION: APPROVED OTHER DENIED PLANNING DIRECTORS DECISION: HEARING DATE: N/A APPROVED DENIED OTHER ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: N/A INITIAL STUDY: N/A NEGATIVE DECLARATION MITIGATED NEGATIVE DECLARATION DEPARTMENTAL REPORTS / APPROVALS: **PUBLIC WORKS** NONE **ATTACHED** AG. COMMISSIONER NONE ATTACHED **APCD** NONE **ATTACHED** DEH/EHS NONE **ATTACHED** FIRE/OES NONE ATTACHED

#### STAFF RECOMMENDATION:

OTHER:

IT IS RECOMMENDED THAT YOU CONDUCT A PUBLIC HEARING, THAT YOU HEAR ALL THE OPPONENTS AND PROPONENTS OF THE PROPOSED PROJECT. STAFF WOULD THEN RECOMMEND THAT YOU TAKE THE FOLLOWING **ACTIONS:** 

- 1) FIND THAT THE PROJECT IS CATEGORICALLY EXEMPT FROM CEQA PURSUANT TO SECTION 15301 OF THE CEQA GUIDELINES AND THAT NO FURTHER DOCUMENTATION IS NECESSARY: AND.
- FIND THAT THE TIME EXTENSION #23-0006 FOR CONDITIONAL USE PERMIT #07-0012 IS CONSISTENT WITH APPLICABLE ZONING, STATE LAWS, AND COUNTY BUILDING ORDINANCES: AND.
- 3) APPROVE TIME EXTENSION #23-0006 FOR CONDITIONAL USE PERMIT #07-0012 FOR A NEW 15-YEAR TERM. SUBJECT TO THE EXISTING CONDITIONS.

#### STAFF REPORT

#### Planning Commission July 12, 2023

Time Extension #23-0006 for CUP #07-0012

Applicant: Jeffrey Lyon on behalf of

The Voice of International Christian Evangelism

dba KGBA AM

#### **Project Location:**

The existing guyed 165 foot AM broadcasting tower is located at 1251 Highway 86, El Centro, CA; also known as Assessor's Parcel Number 054-130-069-000 and legally described as TR 59 1/2 & 62 & E2 TR 58 & POR S2 OF SW4 TR 58 16-14 176.57 AC, S.B.B.M.

#### Project Summary:

The applicant, KGBA AM, is requesting a fifteen (15) year re-entitlement for Conditional Use Permit (CUP) #07-0012 for an existing and operating guyed 165 foot AM broadcasting tower. Upon approval of the fifteen (15) year re-entitlement, CUP #07-0012 will be subject to three (3) year time extensions, starting October 26, 2025, every three (3) years until October 26, 2037 when a new fifteen (15) year re-entitlement will be required per condition G8 of the CUP. After a thorough review of the project file and compliance report, it can be determined that CUP #07-0012 complies with the CUP's conditions of approval and applicable County land use regulations.

#### Project Background:

The CUP was approved by the Planning Commission on September 26, 2007. Since then, the Planning Department had not received any time extension requests until December 18, 2019 when a compliance report and time extension were received. Subsequently, the applicant paid all fees associated with the missed required time extensions. At that time, the CUP was determined to be in compliance by the Planning Department and a time extension approval letter dated March 5, 2020 was sent to the applicant informing them it was the final time extension for the CUP and a request to renew the CUP would be required prior to the expiration date. Upon approval of this reentitlement, the next time extension request will be due before October 26, 2025.

#### County Ordinance:

Time Extension #23-0006 for CUP #07-0012 is consistent with the Imperial County Title 9 Land Use Ordinance, Section 90508.02, "uses permitted only with a Conditional Use Permit" subsection s) Communication Towers.

#### Land Use Analysis

According to the Imperial County General Plan, the land use designation for the parcel is "Agriculture" and zoned A-2 (General Agriculture) pursuant to Zone Map #12.

#### **Surrounding Land Uses, Zoning and General Plan Designations:**

DIRECTION	CURRENT LAND USE	ZONING	GENERAL PLAN
Project Site	Radio Tower surrounded by ag field with homestead	A-2 (General Agriculture)	Agriculture
North	Agriculture	A-2 (General Agriculture)	Agriculture
South	Agriculture	A-2 (General Agriculture)	Agriculture
East	Agriculture and Single Family Residence	A-2-SPA (General Ag Specific Plan Area	Specific Plan Area
West	Agriculture	A-2 (General Agriculture)	Agriculture

#### **Environmental Determination:**

The previously approved Conditional Use Permit #07-0012 was environmentally assessed and reviewed by the Environmental Evaluation Committee on August 23, 2007. It was found that the project would not have a significant effect on the environment and received a Negative Declaration.

Time Extension #23-0006 is categorically exempt from CEQA pursuant to Section 15301 of the CEQA Guidelines (Class 1 – Existing Facility).

#### Staff Recommendation:

Staff recommends that the Planning Commission hold a public hearing, hear all the proponents and opponents of the proposed project, and then take the following actions:

- 1. Find that the project is categorically exempt from CEQA under the Government Code, Section 15301 and that no further environmental documentation is necessary; and,
- 2. Find that Time Extension #23-0006 for Conditional Use Permit #07-0012 is consistent with applicable zoning and building ordinances; and

3. Approve Time Extension #23-0006 for Conditional Use Permit #07-0012 for a new 15-year term, subject to the existing conditions.

PREPARED BY:

Derek Newland, Planner II

Planning & Development Services

**REVIEWED BY:** 

Michael Abraham, AICP, Assistant Director of

Planning & Development Services

**APPROVED BY:** 

Jim Minnick, Director of

Planning & Development Services

ATTACHMENTS:

A. Vicinity Map

B. Site Plan

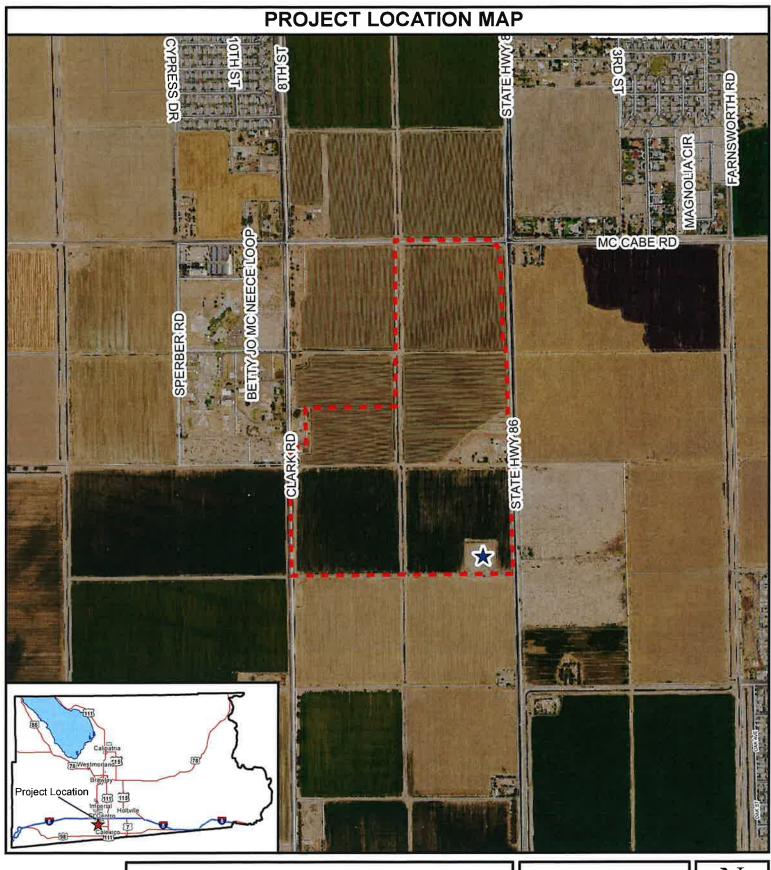
C. Planning Commission Resolution D. Conditional Use Permit #07-0012

E. Time Extension Request Documents

F. Comment Letters

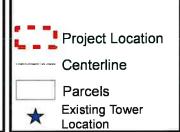
 $DN\S:\AIIUsers\APN\054\130\069\EXT23-0006\PC\EXT23-0006\STAFF\ REPORT.docx$ 

## ATTACHMENT "A" Vicinity Map



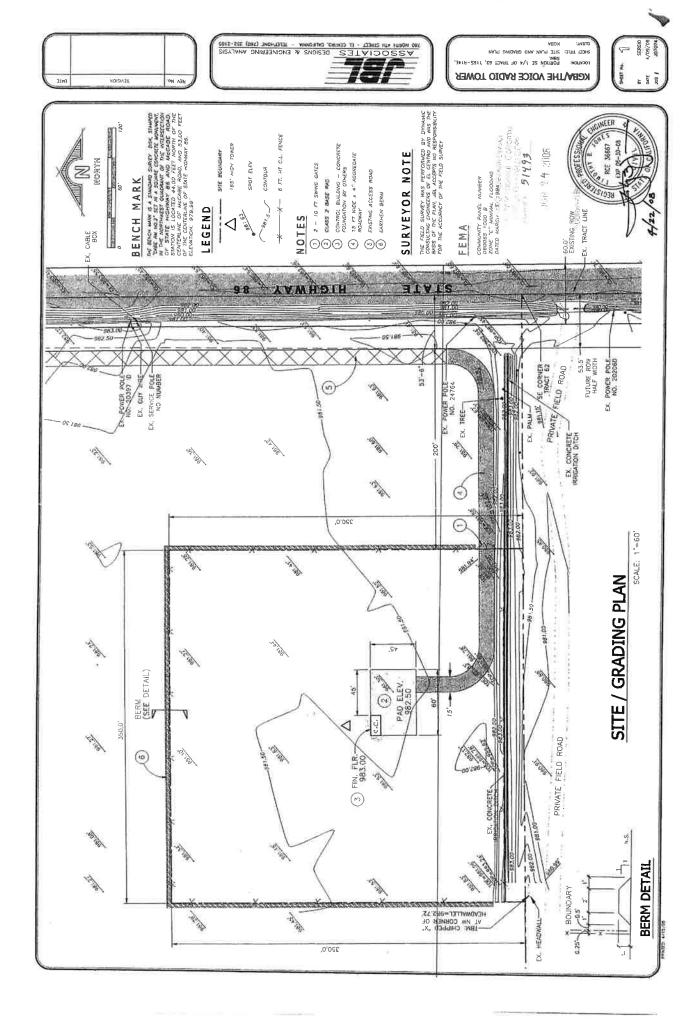


KGBA AM EXT #23-0006 FOR CUP #07-0012 APN 054-130-069-000





## ATTACHMENT "B" Site Plan



# ATTACHMENT "C" Planning Commission Resolution

#### **RESOLUTION NO.**

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING "TIME EXTENSION #23-0006" FOR A NEW (15-YEAR) TERM UNDER "CONDITIONAL USE PERMIT #07-0012" FOR THE VOICE OF INTERNATIONAL CHRISTIAN EVANGELISM, INC, DBA KGBA AM.

- **WHEREAS**, KGBA AM has submitted Time Extension #23-0006 requesting a new 15-year term for the existing guyed 165 foot AM broadcasting tower; and,
- **WHEREAS**, this existing guyed 165 foot AM broadcasting tower was previously approved under Conditional Use Permit #07-0012; and,
- **WHEREAS**, the project is categorically exempt in accordance with section 15301 of the requirements of the California Environmental Quality Act, the State Guidelines, and the County's "Rules and Regulations to Implement CEQA as Amended"; and,
- **WHEREAS**, the Planning Commission of the County of Imperial has been delegated with the responsibility of CEQA determinations, and adoptions and certifications of CEQA documents; and,
- **WHEREAS**, public notice of said request 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 July 12, 2023; and.
- **NOW, THEREFORE**, the Planning Commission of the County of Imperial **DOES HEREBY RESOLVE** as follows:
- **SECTION 1.** The Planning Commission has considered the proposed Time Extension #23-0006 request for Conditional Use Permit #07-0012 prior to approval. The Planning Commission finds and determines that the Time Extension for Conditional Use Permit #07-0012 is adequate and 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.
- **SECTION 2.** That in accordance with State Planning and Zoning law and the County of Imperial regulations, the following findings for approving Time Extension #23-0006 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 "Agriculture". This site is zoned A-2 (General Agriculture) pursuant to Title 9, Division 5, Section 90508.00. The Time Extension request is found consistent with the approved Conditional Use Permit #07-0012 and with the goals/policies of the 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 Project could be found consistent with the purpose of the zone it is located within. The proposed use could be considered a compatible use with a Conditional Use Permit pursuant to Title 9 Division 5 Section 90508.2 "Uses permitted only with a conditional use permit", Subsection s) Communication Towers

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 existing guyed 165 foot AM broadcasting tower is listed as a use subject to a Conditional Use Permit in Land Use Ordinance, Title 9, Division 5, Section 90508.2, Subsection s) Communication Towers.

D. The proposed use meets the minimum requirements of this Title 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 this Title. The project complies with the applicable laws by obtaining a CUP pursuant to Title 9, Division 5, and Section 90508.02. 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 meets the minimum requirements of the Land Use Ordinance, Section 90508.02.

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 project is zoned A-2 (General Agriculture). The project site is surrounded in its majority by actively farmed agricultural land; the existing guyed 165 foot AM broadcasting tower does not appear to create potential impacts near or around the project site nor does it appear to 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 project will be subject to the Conditional Use Permit and current Federal, State, and Local regulations; the subject use does not violate any law or ordinance.

^				• .	4	49	_	1		
G.	ıne	proposed	use	IS	not	arantina	а	special	' privilege.	

The project is a permitted use subject to approval of a Conditional Use Permit #07-0012 under Land Use Ordinance, Section 90203.00 and 90508.00 *et. seq.* and will not grant a special privilege.

**NOW, THEREFORE,** based on the above findings, the Imperial County Planning Commission **DOES HEREBY APPROVE** Time Extension #23-0006 for a new 15-year term under Conditional Use Permit #07-0012, subject to the existing Conditions of Approval.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certify that the preceding resolution was taken by the Planning Commission at a meeting conducted on <u>July 12</u>, <u>2023</u> by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

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

DN\S:\AllUsers\APN\054\130\069\EXT23-0006\PC\EXT23-0006 PC Resolution.docx

## ATTACHMENT "D" Conditional Use Permit #07-0012

When Recorded Return To:

Imperial County Planning & Development Services Department 801 Main Street

El Centro, California 92243

Recorded in Official Records, Imperial County

10/26/2007 3:58 PM IV

Dolores Provencio
County Clerk / Recorder

IMP County of Imperial

Doc#: 2007 - 040044

_
-

Titles: 1		Pages: 15			
Fees		48.00			
Taxes		0.00			
Other		0.00			
PAID	100	\$49.00			

#### AGREEMENT FOR CONDITIONAL USE PERMIT #07-0012

The Voice of International Christian Evangelism, Inc (Voice) DBA KGBA Radio (Telecommunication Tower) (054-130-069-000) (At Planning Commission 9/26/07)

This Agreement is made and entered into on this \_\_17\_\_day of October, 2007 by and between The Voice of International Christian Evangelism, Inc. (Voice) AKA KGBA Radio (hereinafter referred to as "Permittee"), and the COUNTY OF IMPERIAL, a political subdivision of the State of California, (hereinafter referred to as "COUNTY").

#### **RECITALS**

WHEREAS, Permittee is the owner, and/or operator and/or successor-in-interest in certain land in Imperial County known as "Assessors Parcel 054-130-069-000, further described as Tract 59 ½ and 62 and east half of Tract 58 and portion of the south half of the southwest quarter of Tract 58, Township 16 South, Range 14 East, however the legal description for the leased area is Tract 62, Township 16 South, Range 14 East, S.B.M. and;

**WHEREAS**, Permittee has requested a permit to construct, operate and maintain a 165-foot, AM radio guyed tower, above-ground level "AGL", co-locatable, including related facilities therein and;

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

WHEREAS, Permittee intends to operate the tower for its own use, and. Permittee may at some future date allow another "compatible use" communication, or electronic transmission operator (hereinafter referred to as a "subsidiary user"), to use the same tower, thereby minimizing the number of towers required within the confines of the County, and;

WHEREAS, the County would like to encourage multiple use of such towers to the extent that "sharing" of towers is compatible in use, frequency and meets applicable regulatory standards of all permitting jurisdictions, and;

WHEREAS, though the "sharing" of tower space is physically possible, it is recognized that additional structural considerations must be addressed and if applicable, permitted by the Building Inspection Division, so that the tower is structurally adequate, and;

WHEREAS, the County and Permittee recognize that such facilities may create a "visual" impact, and on going monitoring requirements, which impacts local government, as well as other impacts to the surrounding land uses that are significant, but unmitigable, therefore Permittee will provide to County alternative benefits to offset the un-mitigatable impacts, and:

WHEREAS, County, after a review of the project, after a noticed public hearing before the Environmental Evaluation Committee, after a noticed public hearing before the Planning Commission, agreed to issue Conditional Use Permit #07-0012 to Permittee, and/or his or her successor-in-interest subject to all of the following conditions:

**NOW THEREFORE**, the County issued CUP #07-0012 subject to all of the following conditions.

#### **INDEX TO CONDITIONS:**

G-1 G-2 G-3 G-4 G-5 G-6 G-7 G-8 G-10 G-11 G-12 G-13 G-14 G-15 G-16 G-17		Costs Audit of Bills Permits/Licenses Recordation Compliance/Revocation Provisions to Run with Land Right of Entry Time Limit Definitions Specificity Health Hazard Report(s) Responsible Agent Indemnification Change of Owner/Operator Compliance with Ordinance Local Benefit Agreement
	5-1 5-2 5-3 5-4 5-5 5-6 5-7 5-19 5-12 5-13 5-14 5-15 5-16 5-17 5-18	Project Description Access to Site Grading and Drainage Plan/Study Right-of-Way No Trespass Signs Hours of Operation Ancillary uses and Additional Land Use Permits Suspension of Operations Surety Enforcement Action Lighting Conflicting Permit Conditions Minor Administrative Modification Latest Codes Govern Variance Communication Frequency Frequency Coordination APCD Conditions Emergency/Communication Participation Development Agreement (Alternative)

#### **GENERAL CONDITIONS:**

The "GENERAL CONDITIONS" are shown by the letter "G". These conditions are conditions that are either routinely and commonly included in all Conditional Use permits as "standardized" conditions and/or are conditions that the 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!

#### G1 COSTS:

Permittee shall pay any and all amounts as determined by the County to defray all costs for the review of reports, field inspections, enforcement, monitoring, or other activities 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.

#### **G2 AUDIT OF BILLS:**

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

#### G3 PERMITS/LICENSES:

The Permittee shall obtain any and all local, state, and/or federal permits, licenses, contracts, and/or other approvals for the construction and/or operation of this project. This shall include, but not be limited to Health, Building, Sanitation, APCD, Public Works, Sheriff, Regional Water Quality Control Board, Offices of Emergency Services, Division of Mines and Geology, Caltrans, CHP etc. Permittee shall likewise 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 and Development Services Department within 30 calendar days of receipt, when requested.

#### **G4 RECORDATION:**

This permit shall <u>not be effective</u> until it is recorded at the Imperial County Recorders Office, and payment of the recordation fee shall be the responsibility of the Permittee. If the Permittee fails to pay the recordation fee within six (6) months from the date of approval, and/or this permit is not recorded within 180 days from the date of approval, this permit 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 Planning 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.

#### G5 COMPLIANCE/REVOCATION:

Upon the determination by the Planning and Development Services Department, (if necessary upon consultation with other Department(s) or Agency(ies) that the project is or may not be in full compliance with any one or all of the conditions of this Conditional Use Permit, or upon the finding that the project is creating a nuisance as defined by law, the PERMIT and the noted violation(s) shall be brought immediately to the attention of the appropriate enforcement agency or to the Planning Commission for hearing to consider appropriate response and/or 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.

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

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

#### **G7 RIGHT OF ENTRY:**

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

#### **G8 TIME LIMIT:**

Unless otherwise specified within the project specific conditions, this project shall be limited to a maximum of three (3) years from the recordation date of the CUP. The CUP may be extended for successive three (3) year(s) by the Planning Director upon a finding by the Planning and Development Services Department that the project is in full and complete compliance with all conditions of the CUP and any applicable land use regulation(s) of the County of Imperial. Unless specified otherwise herein, no conditional use permit shall be extended for more than four consecutive periods. If an extension is necessary or requested beyond fifteen (15) years, Permittee shall file a written request with the Planning Director for a hearing before the Planning Commission. Such request shall include the appropriate extension fee. An extension shall not be granted if the project is in violation of any

one or all of the conditions or if there is a history of non-compliance with the project conditions or any regulation(s).

#### **G9 DEFINITIONS:**

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

#### G10 SPECIFICITY:

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

#### **G11 HEALTH HAZARD:**

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

#### G12 REPORT(S):

Permittee shall file an annual report with the Planning and Development Services Department to show that Permittee is in full compliance with this Conditional Use Permit. The report shall be filed within sixty (60) calendar days from the first day of the Calendar year, and shall include at a minimum, the total number of "users" on the tower, any problems encountered during the previous year, any reported frequency interference complaints, the name & phone number(s) of the responsible person(s) to contact, and a checklist to show the status of each condition of the CUP and how this project is compliant with all said conditions herein. It shall be the responsibility of the Permittee to provide all reports and to include the information

about other users. The County may request information at any time from Permittee or other user(s) if applicable as the County desires; however, it shall be the responsibility of the Permittee to ensure that the County receives such information as required.

#### **G13 RESPONSIBLE AGENT:**

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

#### **G14 INDEMNIFICATION:**

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

#### G15 CHANGE OF OWNER/OPERATOR:

In the event the ownership of the site or the operation of the site transfers from the current Permittee to a new successor Permittee, the successor Permittee shall be bound by all terms and conditions of this permit as if said successor was the original Permittee. The current Permittee shall inform the County Planning and Development Services Department in writing at least sixty (60) calendar days prior to any such transfer. Failure of a notice of change of ownership 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 Planning and Development Services 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 the requisite surety on file. Furthermore, the existing surety shall not be released until a replacement surety is accepted by the County. Failure to provide timely notice of transfer by Permittee shall forfeit the current surety.

In the event multiple users use this facility, a current written approval from the Permittee shall be provided to the Imperial County Planning and Development Services Department.

#### G16 COMPLIANCE WITH ORDINANCE:

Permittee is aware, has been provided a copy 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.

#### G17 LOCAL BENEFIT AGREEMENT:

Permittee has agreed to provide a local benefit per a negotiated agreement between the County and the Permittee. This local benefit agreement allows the Permittee to provide one of the following: (a) tower space reserved for County/IVECA use the reservation to be held for a period of three years during which the County/IVECA must notify the permittee of its intent to use the facility or in the absence thereof notify its intention not to use the facility; (b) in lieu of the reservation of space, pay an equivalent amount equal to the rental value of the space for the three year period, the funds to be dedicated to a trust account under the control of the Planning and Development Services Department for allocation to the public communications systems being developed by IVECA, IID and ICOE; (c) provide electronic equipment of equivalent value of the three year rental value of the tower space, the type of equipment to be determined by the IVECA, ICOE and IID systems; (d) engineering services of equivalent value as defined in (b) and (c). The Director of Planning and Development Services Department, based upon current community needs determined in consultation with IVECA, ICOE and the IID shall approve the choice of the alternative. The "in lieu of" fee may be paid in a lump sum at time of recordation in which case the total value shall be discounted by 20% of the aggregate value that would have been paid on a monthly basis for the three year period. It may also be paid at the end of the three-year term of the CUP, prior to the renewal of the CUP in which case the total cost will be the aggregate total for the three-year period plus 10% interest on the total.

(TOTAL "G" CONDITIONS are 17)

The balance of this page was intentionally left blank

#### SPECIFIC PROJECT CONDITIONS:

#### S1 PROJECT DESCRIPTION:

This permit authorizes the Permittee to construct, operate and maintain 165-feet high, AM Radio Antenna Guyed Tower), co-locatable, un-staffed with the necessary ancillary equipment, being an 10 foot wide x 20 foot wide transmitter building adjacent to the base of the AM Tower, Cross Section, Guyed Structure. ...The leased compound consists of 2.8 acres behind a six foot high fence that will surround the AM Antenna Tower & Shelter. The AM Antenna Tower height shall not exceed 165-feet, and the total developed height of any antenna thereon shall not exceed 165-feet above ground level (AGL). The tower shall be constructed to the specifications contained in the application and site plan or as modified. In addition to the information contained in the application, and as a result of the County, the applicant and the other interested parties desiring to minimize the number of towers in the County, the tower may be used by multiple users in addition to the Permittee, provided engineering allows such use and the conditions stated herein are followed.

#### S2 ACCESS TO SITE:

Legal and physical access shall be provided to access the AM Radio facility. An encroachment permit shall be secured from CALTRANS and or Imperial County Public Works Department for any and all new, altered or unauthorized existing driveway(s) to access the lot or lots and for any proposed road crossings. All driveway and frontage improvements shall be provided for in accordance with the specifications set forth by the Department of Public Works. Applicant shall contact CALTRANS for any additional comments concerning State Route 86.<sup>1</sup>

#### S3 GRADING AND DRAINAGE PLAN/STUDY:

Permittee (applicant) shall furnish a Grading and Drainage Plan/Study to provide for property grading and erosion control, which shall also include prevention of sedimentation or damage to off-site properties and storm water retention for a 100 year storm event. The Plan/Study shall be submitted to the Department of Public Works for review and approval. Permittee (applicant) shall implement the approved plan together with the employment of appropriate Storm Water Best Management Practices (BMP's) prior to building permits being issued.

#### S4 RIGHT-OF-WAY:

State Route 86 (runs along the east side of the project site) is currently classified by the County of Imperial as a "Prime Arterial" road-way per the Imperial County Circulation Element. The Property owner must provide an "Irrevocable Offer of Dedication" along the east side of subject property outside the Caltrans right-of-way. The request is for sixty-three (63) feet from the centerline of existing Sate Route 86; which would incorporate a portion of Caltrans' existing right-of-way as determined by the Department of Public Works.<sup>1</sup>

#### S-5 NO TRESPASSING SIGNS:

Permittee shall post the site for "No Trespassing" at the front entrance of the fenced 350 foot x 350 foot leased area and at least every side along the active perimeter of the site.

#### S-6 HOURS OF OPERATION:

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

#### S-7 ANCILLARY USES & ADDITIONAL LAND USE PERMITS:

This permit authorizes the Permittee to operate the site as described under condition S1. This permit shall be considered 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.

#### S-8 SUSPENSION OF OPERATIONS:

If operation of the AM Radio facility ceases for a period of twenty four (24) consecutive months, the Permittee shall remove the AM Radio Guyed Antenna, all related equipment, and all structures and buildings within six (6) calendar 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.

#### S-9 SURETY:

- (a) Permittee shall file (with the County) surety in the amount of \$10,000.00 (Ten Thousand Dollars) in a form acceptable to County Counsel. Said surety shall be filed within six (6) months of the approval of this CUP, and/or prior to issuance of any construction permit, whichever comes first, and shall guarantee restoration of the land to its original condition prior to development. Surety shall remain in place throughout the life of the project. Bonding format must be approved by Imperial County Counsel.
- (b) If there are other persons, firms or corporations, hereafter referred as colocators using said tower, in addition to the Permittee, the surety shall increase at the rate of \$5,000.00 (Five Thousand Dollars) per user (co-locator) and shall be provided to the Imperial County Planning and Development Services Department by said persons, firms or corporations.
- (c) The original surety shall remain in effect until the tower and the ancillary facilities are removed and the site restored to its original condition. In the event there is a history of "non-compliance with these conditions, prior to the renewal terms herein, the surety may be administratively increased from \$10,000.00 minimum, to \$15,000.00 or more, as may be desired by the Planning Commission or the Planning and Development Services Director.

#### S-10 ENFORCEMENT ACTION:

The County officials responsible for monitoring and/or enforcing the provisions of this permit, under Title 9 Land Use Ordinance, shall issue a notice requiring abatement of a violation of its terms within a reasonable time as set by ordinance or

County policy. As an example, responsible County officials may issue a Notice of Violation or citation and/or cease-and-desist order for repeated violation until such violations are abated. Under specific violations, County may order the facility to cease immediate operations until it can or will be operated in full compliance.

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

#### S-11 LIGHTING:

Aircraft warning lights are to be installed on the tower to meet Federal Aviation Administration (FAA) specifications. Electrical backup power shall be provided for these lights on the AM tower according to FAA standards and at a minimum shall include lights at the top and at the mid-point of the structure. Permittee shall submit evidence of compliance with the FAA requirements within six (6) months from the approval date of this CUP. As required by the Airport Land Use Commission, Permittee shall install a medium strobe beacon that meets FAA standards (for daylight use only) and a red flashing warning light to warn aircraft in the vicinity.

Permittee is allowed to have security as well as operational lighting. Lighting shall be shielded and directed towards on-site areas to minimize off-site interference from unacceptable levels of light or glare.

#### S-12 CONFLICTING PERMIT CONDITIONS:

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

#### S-13 MINOR ADMINISTRATIVE MODIFICATION:

The Planning Director shall have the authority to make interpretations, issue administrative decisions and provide directions that while not modifying the intent of any condition, will allow for problem resolution at an administrative level. Both the Planning and Development Services Director and/or Permittee have the right to appeal 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 Planning Commission.

#### S-14 LATEST CODES GOVERN:

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

#### S-15 VARIANCE:

The Applicant/Permittee has requested a variance. Variance 07-0003 was approved by the Imperial County Airport Land Use Committee on July 18, 2007 and is attached hereto and made a part hereof.

#### S-16 COMMUNICATION FREQUENCY:

Transmission frequency, amount of radiated power, and antenna characteristics shall be in compliance with requirements by the Federal Aviation Authority (FAA), Federal Communications Commission (FCC), Planning and Development Services Department and other applicable agencies.

#### S-17 FREQUENCY COORDINATION:

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

#### S-18 APCD REQUIREMENTS:

The Permittee shall comply with Imperial County Air Pollution Control District Regulation VIII with movement of earth.

Permittee shall secure APCD permits for any engines, standby generators equal to 50 horse powers or more.

#### S-19 EMERGENCY COMMUNICATION PARTICIPATION:

The Permittee shall, in exchange for the benefit of this authorization, create a public benefit to the County by supporting the County in its program to establish and maintain a Countywide emergency communication system as well as a Countywide High-Speed Internet Communication system.

#### S-20 <u>DEVELOPMENT AGREEMENT (ALTERNATIVE):</u>

In lieu of Condition S19, the Permittee will enter into a "Development Agreement" with the County, the terms of which shall substantially support the concept of G-17. The development agreement may, however, provide alternative benefits that the County desires "in lieu of" direct payments. The Permittee may exercise this option within thirty (30) days from the date of approval by the Planning Commission, but prior to recordation; however, in doing so the Permittee agrees to be bound by Condition S19 until such time as a "development agreement" becomes effective. If the development agreement process is commenced, but not completed, condition S19 shall continue to govern.

Permittee is advised that County does have a "Development Agreement" ordinance which governs the processing of such an agreement.

(TOTAL "S" CONDITIONS ARE 20)

- 1. Letter from Public Works, dated August 15, 2007
- 2. Letter from APCD dated July 5, 2007

**NOW THEREFORE**, County hereby issues Conditional Use Permit #07-0012 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

The Voice of International Christian Evangelist, Inc. (VOICE) AKA KGBA Radio

COUNTY OF IMPERIAL, a political Subdivision State of California

By: Bob Sager, Vice President

Jurg Heuberger, AICP, CEP

Planning & Development Services
Director

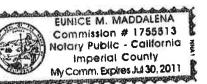
Dated

10-17-2007

Dated\_\_\_\_\_/0-23-07

#### PERMITTEE NOTARIZATION

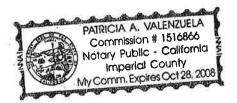
STATE OF CALIFORNIA	
COUNTY OFIMPERIAL	_} S.S.
OnOCTOBER_17, 2007	before me,
Bob Sager	State, personally appeared personally known to
me (or proved to me on the basis of satisfa whose name(s) is/are subscribed to the within that he/she/they executed the same in his/he that by his/her/their signature(s) on the instrurbehalf of which the person(s) acted, executed	actory evidence) to be the person(s) instrument and acknowledged to me er/their authorized capacity(ies), and ment the person(s), or the entity upon
WITNESS my hand and official seal	EUNICE M. MADDALENA Commission # 1785813 Notary Public - California
Signature Chance In Madda	Imperial County My Comm. Expres Jul 30, 2011
ATTENTION NOTARY: Although the information requested below is this certificate to unauthorized document.	OPTIONAL, it could prevent fraudulent attachment of
Title or Type of Document AGREEMENT FOR CO Number of Pages 12 Date of Docume Signer(s) Other Than Named Above	NDITIONAL USE PERMIT #07-0012 ent 9/26/07



#### **COUNTY NOTARIZATION**

STATE OF CALIFORNIA
COUNTY OF IMPERIAL S.S.
On OctoBER 23, 2007 before me, PATRICIA A VALENZUELA a Notary Public in
and for said County and State, personally appeared personally known to
me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.
WITNESS my hand and official seal
Signature hatricia A. Valenzuela
ATTENTION NOTARY: Although the information requested below is OPTIONAL, it could prevent fraudulent attachment of this certificate to unauthorized document.
Title or Type of Document depresented for Conditional We termed
Number of Pages /6 Date of Document October 17, 200 7 Signer(s) Other Than Named Above
oignor(s) other manifed Above

PAVAA\S:\APN\054-130-069\CUP CONDITIONS FOR CUP07-0012 FINAL



# ATTACHMENT "E" Time Extension Request Documents



Engineering And Information Technology 780 N. 4th Street El Centro, CA 92243 (760) 337-1100 (760) 337-8900 fax

March 29, 2023

Mr. Derek Newland, Planner II Imperial County Planning Department 801 Main Street El Centro, CA 92243



MAR 3 0 2023

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

#### CUP #07-0012 (EXT#19-0027) Conditions Status Report

The Voice of International Christian Evangelism 1251 S. Hwy 86-El Centro, CA (APN 054-130-069)

GSL Project No. GS0713

Dear Mr. Newland:

KGBA AM is providing this status letter for Conditional Use Permit #07-0012 (165 ft. guyed AM radio tower). This letter is provided to indicate compliance with the General and Site-Specific Conditions of the CUP. The CUP was recorded on October 26, 2007. An extension to the CUP was granted (EXT#19-0027) which will expire on October 26, 2023. The Voice of International Christian Evangelism is requesting a 15-year extension of the original CUP and is providing the \$800.00 fee for the CUP application.

#### GENERAL CONDITIONS

G1/G2: No comment.

G3: The 2021 update to the FCC license (good until Dec. 1, 2029) is provided with this Status Report. Original Building Permit BP#51493 Final Inspection was never finalized. All building and electrical related issues were approved after construction of the tower in mid-2008, but an ICDPW approval for the access driveway was not resolved. A new Building Permit has been issued (BP#59310) to reactivate the original BP#51493. No APCD construction permit was required (no earthmoving activities or standby generator. ICDPW Drainage Letter Approval acquired 6/24/08. No Health, Sanitation, Sheriff, Regional Water Quality, OES, Division of Mines & Geology permits required.

G4 thru G11: No comment. No transfer of ownership.

G12: This letter is the Annual Report and will be renewed within 60 days of each calendar year.

G13: The responsible agent is Bob Sager (760)455-1805 and the emergency contact is (760)352-9860: Timothy Lozano or Bob Sager.

G14/G15/G16: No comment.

G17: The Local Benefit Agreement provides for KGBA AM 1490 to act as an emergency broadcast site for the Office of Emergency Services.

#### **SITE SPECIFIC CONDITIONS**

S1: The project consists of a guyed 165 ft. tall (lighted) AM broadcast tower with one broadcast equipment shelter and one (1) mobile storage trailer for extra equipment.

**S2:** Access to the site is from an existing driveway at the north boundary of the farm field. The access driveway has an "all-weather" surface. The access driveway to SR86 has been in existence since at least 1966 as shown on Caltrans right of way map XI-IMP-8, PM3.7.

S3: A grading and drainage plan was approved by the ICDPW (6.24.08) prior to construction of the site tower and fencing. An earthen berm to retain all storm water surrounds the fenced tower site.

S4: No irrevocable offer of dedication (right of way) is being provided to County as County Public Work Director/Road Commissioner has determined that the project fronts a State Highway where County does not have jurisdiction.

S5: No trespassing signs have been secured to the perimeter fence of the tower at the entrance gate and at each side of the fenced area.

S6 thru S8: No comment.

**S9:** A restoration security bond (Mechanics Bank Certificate of Deposit dated 12/19/22) in the amount of \$10,000.00 with documentation is attached. No other users are located on the KGBA AM tower. Additional restoration bonds will be provided at \$5,000.00 per user.

S10: No comment.

S11: Tower lighting complies with FAA requirement with a red flashing top beacon and a medium strobe beacon (for daylight hours). There are high visibility spheres mounted on the three (3) guy wires.

S12 thru S15: No comment.

**S16:** AM broadcast frequency and power conforms to the FCC requirements for KGBA AM 100.1. Tower broadcasting was initiated in late 2008 and has remained continuous.

**S17:** No radio wave interferences have been reported.

S18: There were no APCD requirements during construction of the tower. No standby generators are sited at this facility.

S19: KGBA participates in the County's Public Benefit Program for enhancement of emergency responses by providing an emergency broadcast site for the Office of Emergency Services.

S20: No comment.

Please let me know if additional information is needed.

Sincerely Yours,

GS Lyon Consultants, Inc.

Jeffrey O. Lyon, PE Principal Engineer

## ATTACHMENT "F" Comment Letters



## Imperial County Planning & Development Services Planning / Building

Jim Minnick

May 03, 2023 REQUEST FOR REVIEW AND COMMENTS

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

To: County Agencies		State Agencies/Other	Cities/Other		
County Executive Office – Rosa Lopez/			Ag. Commissioner – Rachel		
Miguel Figueroa		Benavidez/Fred Miramontes/Ryan	Garewal/Margo Sanchez/Ana L		
□ APCD – Monica Soucier/Belen Leon/Jesus     Ramirez     □ EHS – Jeff Lamoure/Mario Salinas/ Alphonso     Andrade/Jorge Perez/Vanessa R Ramirez		Kelley/ Manuel Deleon Board of Supervisors – Luis Plancarte - District #2 CIC Fire/OES Office – Andrew Loper/Sal Flores/Robert Malek	Gomez/Jolene Dessert/ Sandra Mendivil  Campo Band Of Mission Indians – Marcus Cuero/ Jonathan Mesa  Fort Yuma – Quechan Indian Tribe - H. Jill McCormick/Jordan D. Joaquin		
⊠ Public Works – Gu Gay	illermo Mendoze/John				
From:	Derek Newland II - (442) 2	65-1736 or dereknewland@co.imperial.ca	us		
Project ID:	EXT#23-0006 For CUP#07-0012				
Project Location:	1305 Hwy 86, El Centro, CA 92243 APN 054-130-069				
Project Description:	Applicant is requesting a new 15 year time extension for Conditional Use Permit #07-0012 for an existing guyed 165 ft. tall AM broadcast tower for existing operations.				
Applicants:	KGBA AM				
Comments due by: May 17th 2023 at 5:00PM					
COMMENTS: (attach a separate sheet if necessary) (if no comments, please state below and mail, fax, or e-mail this sheet to Case Planner)					
Name: Ana Grome 2 Signature: Star Title: Ag Biologist					
Name: Ana Grome 2 Signature: Signature: Title: Ag Biologist  Date: 5/8/2023 Telephone No.: 442 268 1500 E-mail: analgoniez @ co.imperial.ca.vs					

DNIATIS:\AllUsers\APN\054\130\089\EXT23-0006\KGBA Request for Comments 05.03.23 .docx

RECEIVED

MAY 08 2023

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

AIR POLLUTION CONTROL DISTRICT

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

May 16, 2023

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

RECEIVED

MAY 16 2023

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

SUBJECT:

Time Extension 23-0006 - KGBA AM

Dear Mr. Minnick,

The Imperial County Air Pollution Control District (Air District) appreciates the opportunity to review and comment on Time Extension (EXT) 23-0006 (Project) that will grant a 15-year extension for Conditional Use Permit (CUP) 07-0012 for an existing 165-ft tall guyed AM broadcast tower (Project). The project is located at 1305 Highway 86, El Centro also identified as Assessor's Parcel Number 054-130-069.

Conditions of the CUP which are of interest to the Air District include General Condition G3 – PERMITS/LICENSES which states the permittee must obtain any permits, licenses, contracts, or approvals needed for the project and includes the Air District as a permitting agency. As well as Specific Condition S-18 – APCD REQUIREMENTS, which states the permittee, shall comply with Regulation VIII and shall secure Air District permits for any engines or generators of 50 or more horsepower. A review of Air District records found no active or closed permit for the project location, however, the letter included in the packet states the project is not operating any standby generator, which would be consistent with our records.

The Air District would simply remind the applicant that the project must comply with all Air District rules and regulations and if any equipment changes should occur, such as the addition of a standby generator, an application for permitting review must be submitted to the Air District.

For your convenience the Air District's rules and regulations are available via our website at <a href="https://apcd.imperialcounty.org/rules-and-regulations">https://apcd.imperialcounty.org/rules-and-regulations</a>. Please feel free to call should you have questions at (442) 265-1800.

Respectfully,

Ismael Garcia

**Environmental Coordinator** 

Reviewed by

Monica N. Soucier

**APC Division Manager** 

#### Melina Rizo

From:

Guillermo Mendoza

Sent:

Monday, May 15, 2023 1:56 PM

To:

Aimee Trujillo; Rachel Garewal; Sandra Mendivil; Jolene Dessert; Margo Sanchez; Ana L Gomez; Belen Leon; Monica Soucier; Jesus Ramirez; Luis Plancarte; Rosa Lopez; Miguel Figueroa; Vanessa Ramirez; Jeff Lamoure; Alphonso Andrade; Jorge Perez; Mario Salinas;

Salvador Flores; Robert Malek; Andrew Loper; John Gay; rkelley@icso.org; rbenavidez@icso.org; Fred Miramontes; mdeleon@icso.org; Marcus Cuero;

imesa@campo-nsn.gov; Jill McCormick; Jordan D. Joaquin

Cc:

Jim Minnick; Michael Abraham; Derek Newland; Diana Robinson; John Robb; Kamika

Mitchell; Laryssa Alvarado; Melina Rizo; Rosa Soto; Valerie Grijalva

Subject:

RE: EXT23-0006/CUP07-0012 Request for Comments

Good afternoon,

ICDPW has no comments/ objection with the issuance of TE 23-0006.

Thanks,

Guillermo Mendoza Permit Specialist Imperial County Department of Public Works 155 S. 11<sup>th</sup> Street (442) 265 – 1818



MAY 15 2023

IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES



From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>

Sent: Wednesday, May 3, 2023 4:31 PM

To: Rachel Garewal <RachelGarewal@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>; Ana L Gomez <analgomez@co.imperial.ca.us>; Belen Leon <BelenLeon@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; Luis Plancarte <LuisPlancarte@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Miguel Figueroa <miguelfigueroa@co.imperial.ca.us>; Vanessa Ramirez <VanessaRamirez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Mario Salinas <MarioSalinas@co.imperial.ca.us>; Salvador Flores <SalvadorFlores@co.imperial.ca.us>; Robert Malek <RobertMalek@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Guillermo Mendoza <GuillermoMendoza@co.imperial.ca.us>; John Gay <JohnGay@co.imperial.ca.us>; rkelley@icso.org; rbenavidez@icso.org; Fred Miramontes <fmiramontes@icso.org>; mdeleon@icso.org; Marcus Cuero <marcuscuero@campo-nsn.gov>; jmesa@campo-nsn.gov; Jill McCormick <hi>historicpreservation@quechantribe.com>; Jordan D. Joaquin <tribalsecretary@quechantribe.com>

Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Derek