Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

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

FROM: Jim Minnick, Secretary
Planning & Development Services Director

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

DATE OF REPORT: June 18, 2025

AGENDA ITEM NO: 3

HEARING DATE: June 18, 2025

HEARING TIME: 6:00 p.m.

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

STAFF RECOMMENDATION

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

SECRETARY'S REPORT

Project Location:

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

Project Description:

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

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

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

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

General Plan/ALUCP Analysis:

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

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

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

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

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

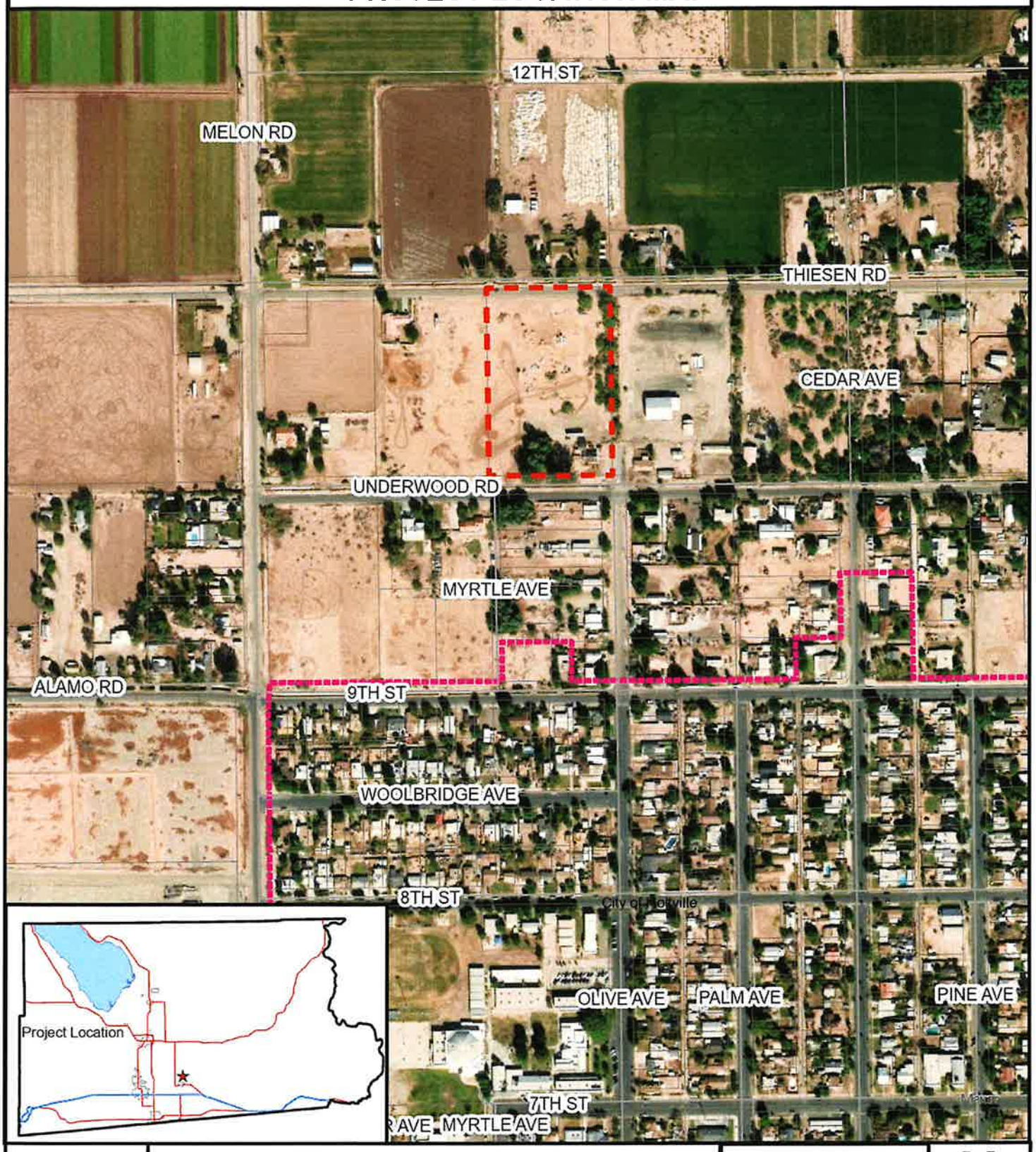
ATTACHMENTS:

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

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

ATTACHMENT "A" - VICINITY MAP

PROJECT LOCATION MAP

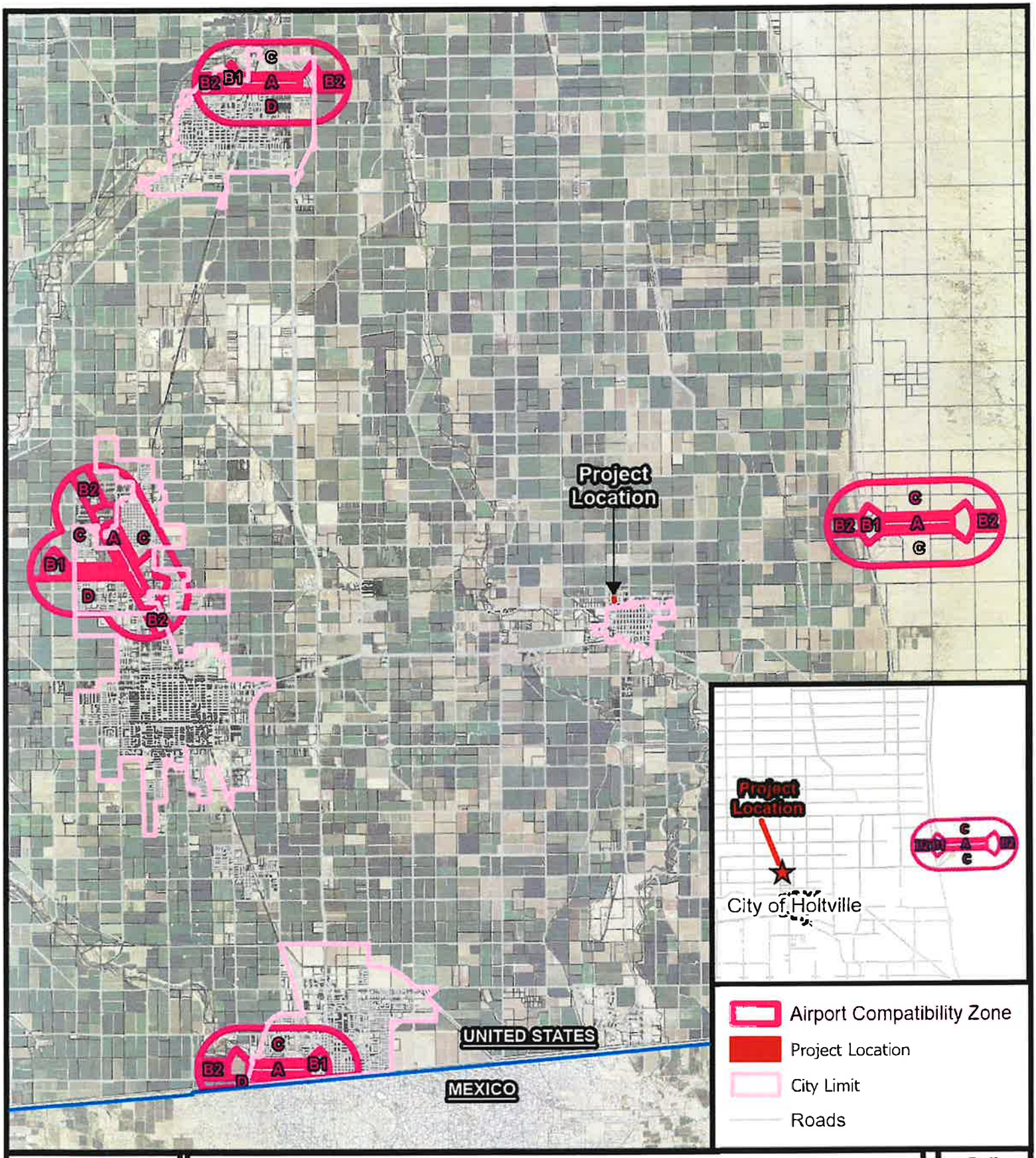


VB BTS III, LLC
CUP #25-0004
V #25-0001
IS #25-0012
APN 045-600-017-000

Project Location
Centerline
City Limit
Parcels

N

ATTACHMENT "B" – ALUC MAP



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

N

ATTACHMENT "C" – ASSESSOR'S PLAT MAP

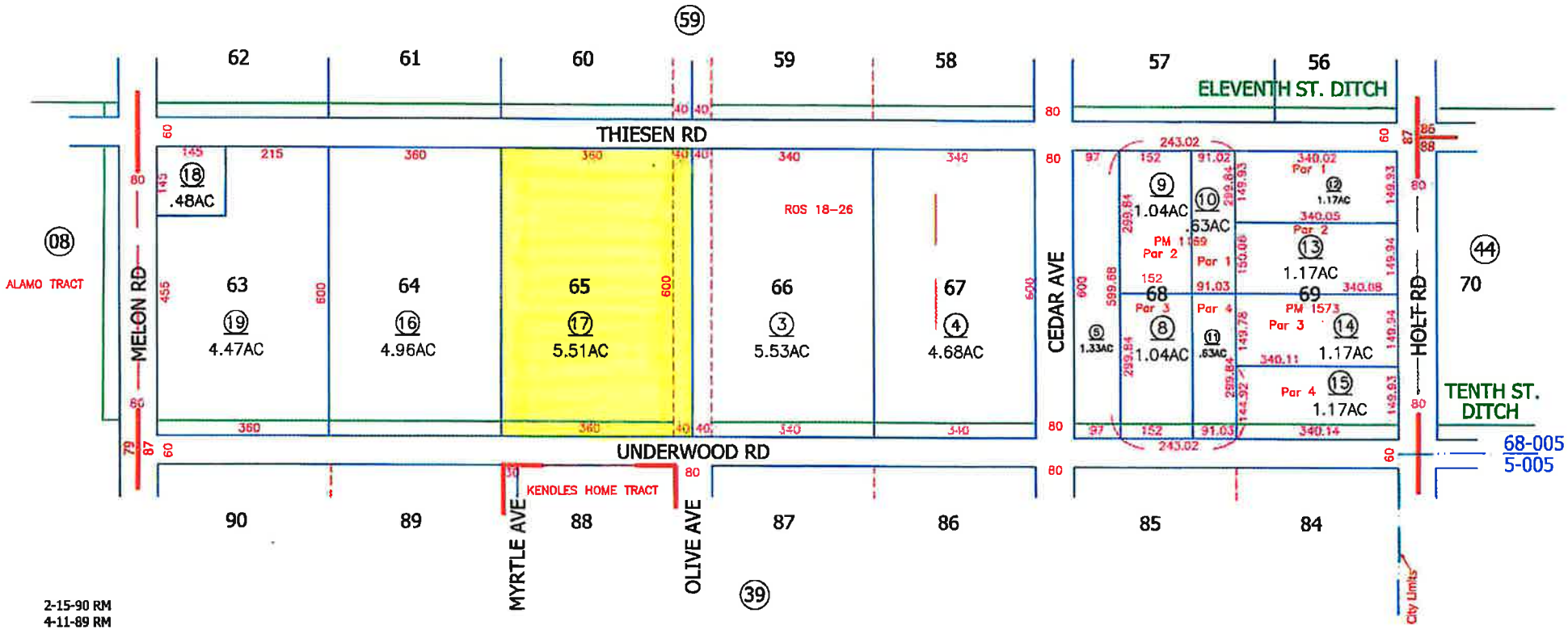
BLKS 63 thru 69 INCL TOWNSITE OF HOLTVILLE (OUTSIDE)

POR TRACT 87 T15S, R15E

O.M. 1-12

Tax Area Code
68-005

45-60

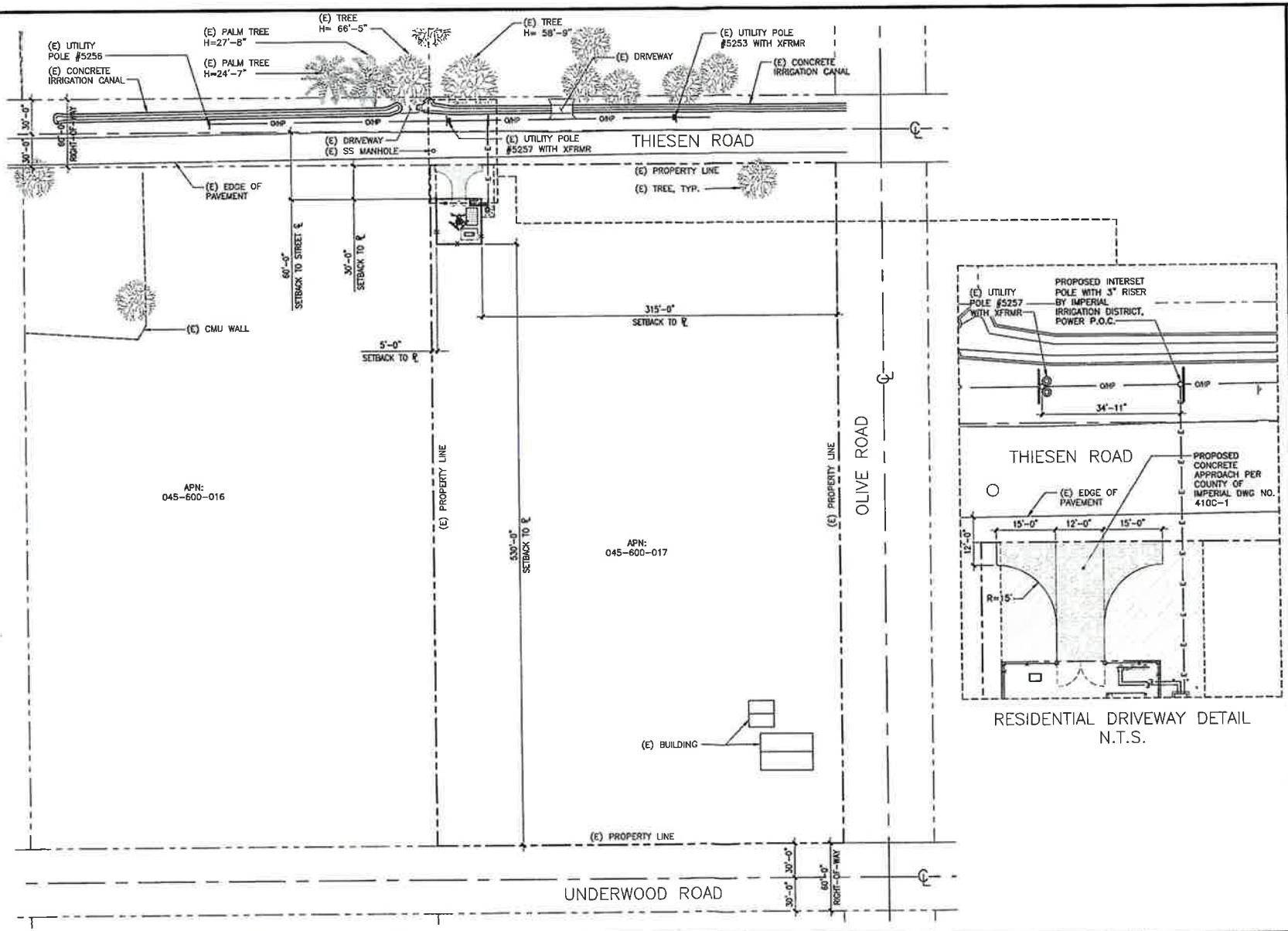


2-15-90 RM
4-11-89 RM
2-2-88 LS
4-27-84 LS
BLOW-UP
From 45-09
5-19-77 DM
RETRACE 3-4-13 MF
1-26-79 LS 9-27-12 MF

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

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

ATTACHMENT "D" – SITE PLAN



RESIDENTIAL DRIVEWAY DETAIL
N.T.S.

SITE PLAN

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

1

CLIENT

vertical bridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	JR	09/30/24
A	ISSUED FOR REVIEW	CV	08/15/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

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

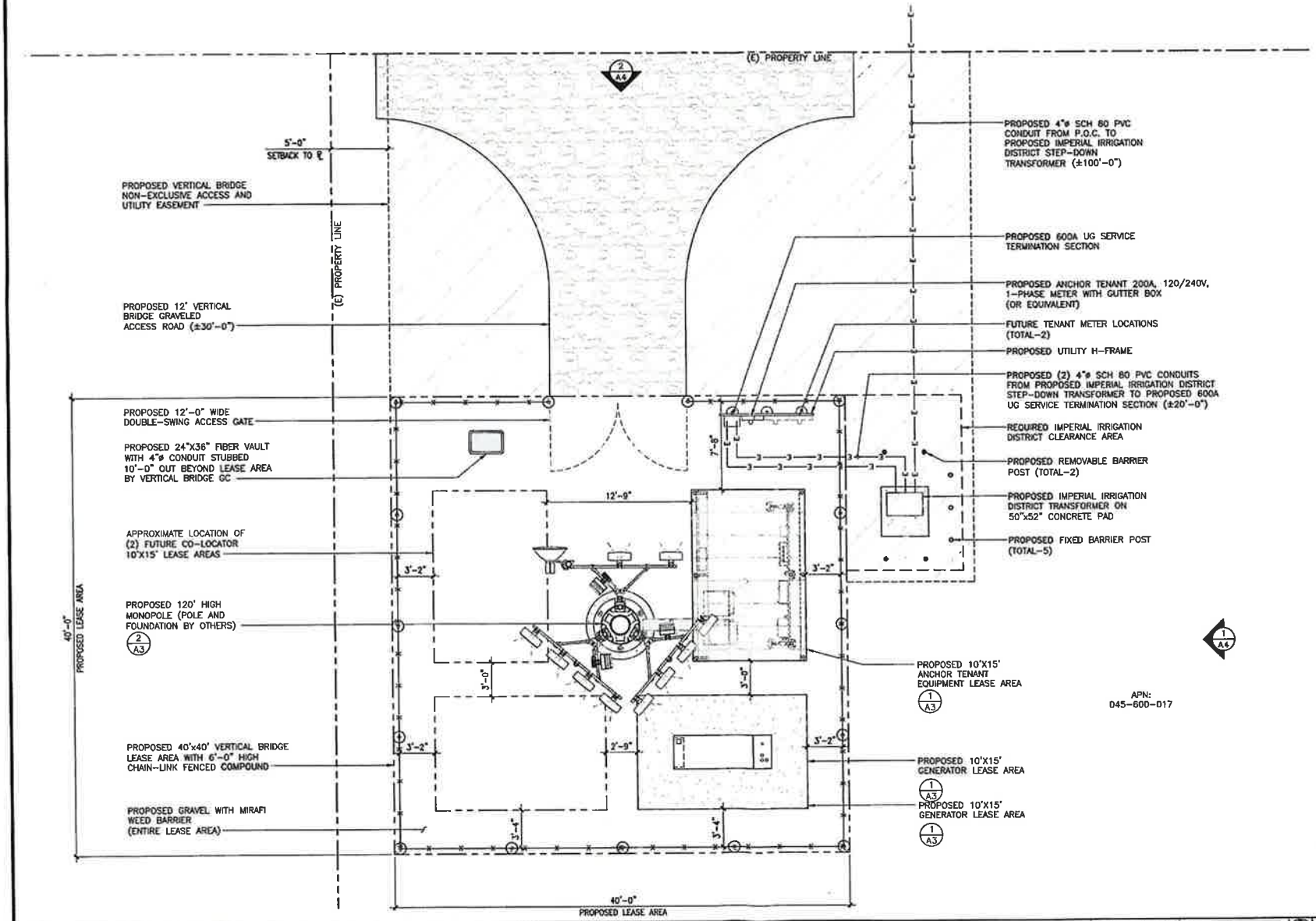
ENGINEER STAMP:

DRAWING TITLE:
SITE PLAN

DRAWING SCALE: AS NOTED
DATE: 08/15/24

ZD

DRAWING NUMBER:
A1



ENLARGED COMPOUND PLAN

11"x17" SCALE: 1" = 60'-0"
24"x36" SCALE: 1" = 30'-0"
0 15' 30' 60'

1

CLIENT

vertical bridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561 948 8387

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

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

NO	SUBMITTAL / REVISION	BY	DATE
2	ISSUED FOR ZONING	JR	09/30/24
A	ISSUED FOR REVIEW	CV	09/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

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

ENGINEER STAMP:

DRAWING TITLE:
ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED
DATE: 09/30/24
ZD

DRAWING NUMBER:
A2

ATTACHMENT "E" – APPLICATION AND SUPPORTING DOCUMENTATION

CONDITIONAL USE PERMIT

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

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

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

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

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

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

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

Jesus Gonzales — Print Name — 12/13/22 — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

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

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

CUP #
25-0004

VARIANCE

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

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

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

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

8. DESCRIBE VARIANCE REQUESTED (i.e. side yard set-back reduction, etc.)

Requesting the extended height of the tower, 120' that deviates from the maximum height of 60' in the A-1 zone.

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

10. DESCRIBE THE ADJACENT PROPERTY

East	Zoning: A-1-U, Vacant/Agricultural Use & Structures
West	Zoning: A-1-U, Residential/Vacant
North	Zoning: A-1-U, Residential/Agriculture
South	Zoning: R-1-U, Residential

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

Jesus Gonzales — Print Name — 12/15/24 — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

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

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

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

V # 25-0001

ASSURANCE
DEVELOPMENT

Attachment 1

Project Narrative

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

Submitted to Imperial County, California
Planning & Development Services Department

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

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

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

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

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

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

Zoning Classification: A-1, Limited Agricultural

General Plan Designation: Urban

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

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

1. PROJECT OVERVIEW

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

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

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

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

2. PROPOSED PROJECT DETAILS

2.1. Location

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

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

2.1.2. Lease area.

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

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

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

2.2. Wireless Facilities and Equipment

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

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

2.2.2. Antennas and accessory equipment.

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

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

2.2.3. Ground equipment.

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

2.3. Additional Details

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

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

3. T-MOBILE NETWORK COVERAGE AND SERVICES

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

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

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

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

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

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

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

4. APPLICABLE LAW

4.1. Local Codes

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

4.2. State Law

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

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

4.3. Federal Law

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

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

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

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

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

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

[2] Id. at ¶ 35.

[3] Id. at ¶¶ 34-42.

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

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

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

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

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

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

[4] 47 C.F.R. § 1.6002(g).

ASSURANCE
DEVELOPMENT

Attachment 2

Statement of Code Compliance

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

Submitted to Imperial County
Planning & Development Services Department

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

Wireless Facilities Requirements

a. Division 24 – Chapter 1 Communication Facilities

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

Division 24 COMMUNICATION FACILITIES

Chapter 1 COMMUNICATION FACILITIES

92401.00 Purpose.

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

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

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

C. Minimize the number of towers throughout the community;

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

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

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

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

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

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

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

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

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

92401.01 Definitions.

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

92401.02 Applicability.

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

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

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

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

92401.03 Exemptions.

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

92401.04 General requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

92401.05 Permitting and application requirements.

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

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

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

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

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

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

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

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

a. The facility complies with all applicable Section 92401.04.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(B) Height.

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

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

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

(C) Onsite Location.

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

92401.06 Alternatives analysis—Information required.

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

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

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

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

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

92401.07 Visual analysis.

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

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

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

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

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

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

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

92401.08 Radio-frequency exposure review.

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

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

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

1. Facilities described in Table 1 Section 1.1307 "Transmitters, Facilities and Operations Subject to Routine Environmental Evaluation" of the FCC Rules and Regulations, 47 C.F.R. Section 1.1307, or any superseding regulation;

2. Facilities proposed to be installed within fifty (50) feet of an existing communication facility;

3. Facilities with one or more antenna to be installed less than ten (10) feet above any area that is accessible to untrained workers or the public.

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

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

1. The RF environmental evaluation report is subject to approval of the planning director.

2. The RF environmental evaluation report shall be prepared by a radio-frequency exposure professional.

3. The RF environmental evaluation report shall explicitly state that "operation of the proposed facility in addition to other ambient RF emission levels will not exceed current FCC-adopted standards with regard to human exposure in controlled and uncontrolled areas as defined by the FCC."

4. Assumptions utilized for the calculations of RF exposure shall be conservative in nature and at a minimum be in accordance with the most recent FCC guidance on assessment of RF exposures.

5. The RF environmental evaluation report shall compare RF measurements and/or calculations of RF exposure to the applicable FCC exposure standard. The comparison shall include the power density in micro-watts per square centimeter and as a percentage of the applicable FCC exposure standard.

6. RF field measurements of power density of the proposed facility and/or surrounding facilities are required to be included in the RF environmental evaluation report when:

   a. Adequate technical information regarding other wireless communication facilities that may substantially contribute to RF exposure at the subject site is unavailable;

   b. Calculations of RF exposure indicate the possibility of exposures in excess of the FCC exposure standard; or

   c. So directed by the planning director because of concerns about the number of near-by facilities.

7. All required RF field measurements shall be performed by a radio-frequency exposure professional. Evidence must be submitted showing that the testing instrument(s) used were calibrated within their manufacturer's suggested periodic calibration interval, and that the calibration is by methods traceable to the National Institute of Standards and Technology. Measurements shall be performed in compliance with FCC guidance regarding the measurement of RF emissions and shall be conducted during normal business hours on a non-holiday weekday.

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

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

Applicants' Response: Acknowledged.

92401.09 Towers.

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

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

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

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

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

E. A landscape plan showing specific landscape materials;

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

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

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

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

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

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

92401.10 Modifications to facilities.

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

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

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

92401.11 Changes to FCC standards.

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

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

92401.12 Life of approval.

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

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

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

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

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

92401.13 Facilities in existence prior to adoption of these regulations.

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

92401.14 Public benefit.

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

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

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

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

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

Applicants' Response: Acknowledged.

END OF STATEMENT OF CODE COMPLIANCE.

ASSURANCE
DEVELOPMENT

Attachment 8

Zoning Drawings

PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 120' MONOPOLE WITH (10) 8' ANTENNAS, (12) RRU'S, (1) 3' MICROWAVE, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) BACK-UP DIESEL GENERATOR, (1) 10'x15' ICE CANOPY, (2) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON H-FRAME WITHIN A 40'x40' FENCED LEASE AREA. NO WATER OR SEWER SERVICE IS REQUIRED. THIS WILL BE AN UNMANNED FACILITY.

CODE COMPLIANCE:

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

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

vertical bridge

US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

120' MONOPOLE

TENANT SITE ID: SD07772

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

VICINITY MAP
N.T.S

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

LOCATION MAP
N.T.S

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

EMERGENCY:
CALL 911

DIGALERT UNDERGROUND SERVICE ALERT
811

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

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

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5079

NO	SUBMITTAL REVISION	BY	DATE
0	ISSUED FOR ZONING	JR	03/30/24
A	ISSUED FOR REVIEW	CV	04/15/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER (US-CA-5363)

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

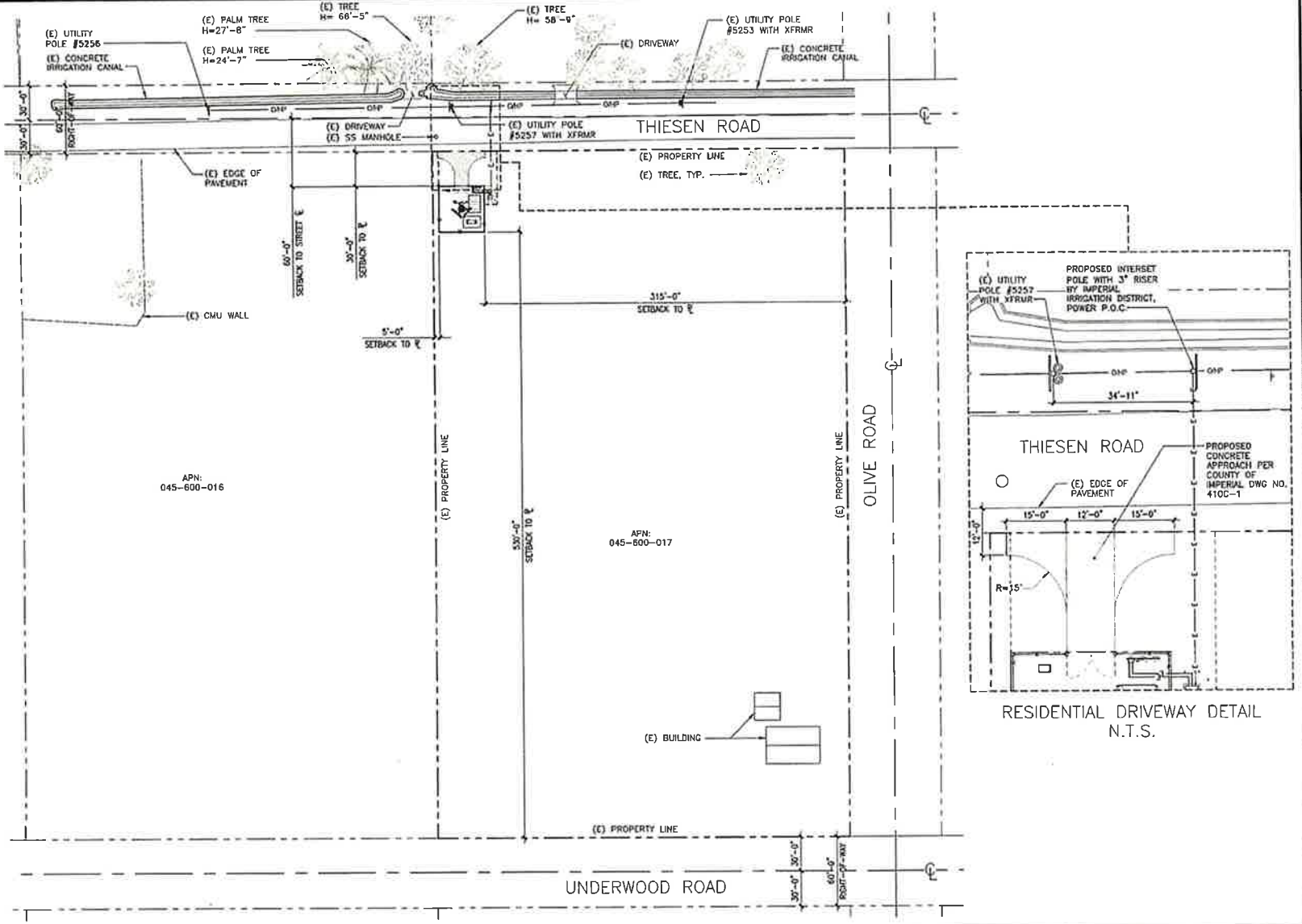
ENGINEER STAMP

DRAWING TITLE
TITLE SHEET

DRAWING SCALE
AS NOTED
DATE
04/15/24

ZD

DRAWING NUMBER
T1



RESIDENTIAL DRIVEWAY DETAIL
N.T.S.

SITE PLAN

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

1

CLIENT

vertical bridge

750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 5387

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5078

NO	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	JR	03/30/24
A	ISSUED FOR REVIEW	CV	03/19/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER
US-CA-5363

PROJECT TITLE

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE:
SITE PLAN

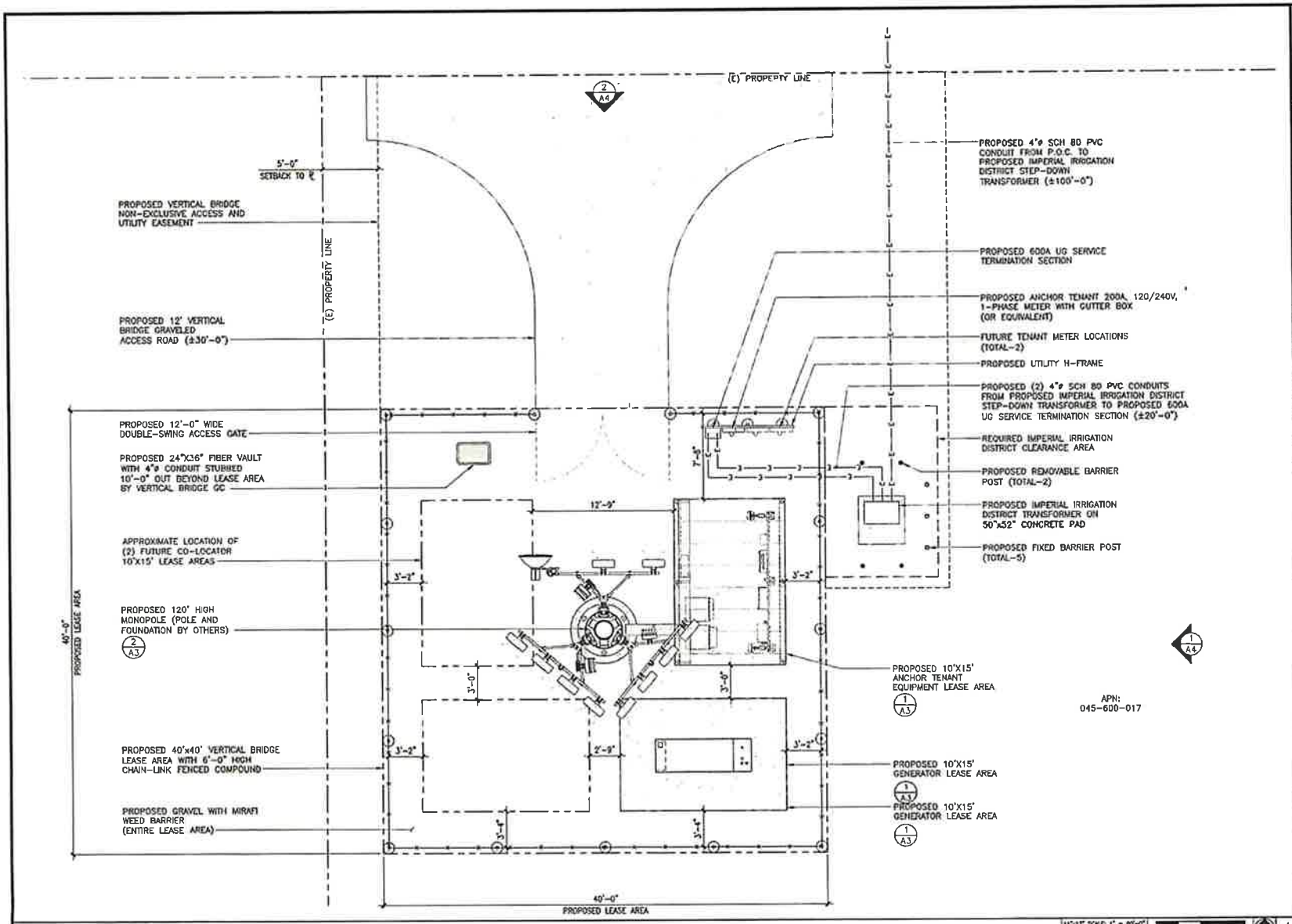
DRAWING SCALE
AS NOTED

DATE
03/30/24

ZD

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

DRAWING NUMBER
A1



ENLARGED COMPOUND PLAN

11"x17" SCALE: 1" = 60'-0"
24"x36" SCALE: 1" = 30'-0"
0 15' 30' 60'

1

CLIENT

verticalbridge

750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8387

SITE ACQUISITION

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

NO	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	JR	09/09/24
A	ISSUED FOR REVIEW	CV	09/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE

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

ENGINEER STAMP

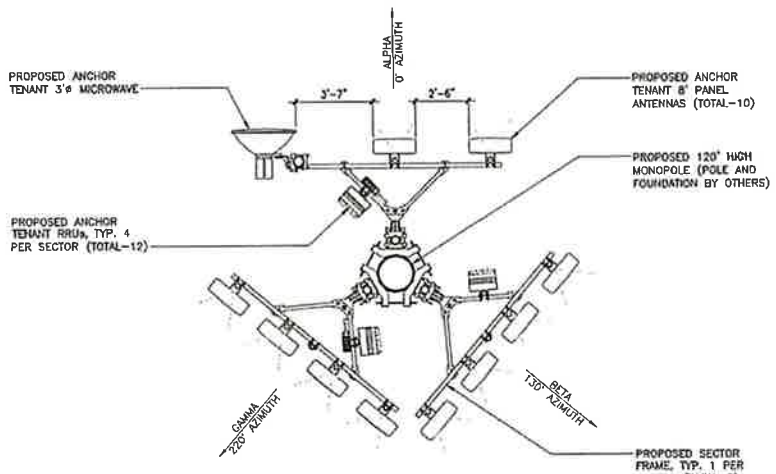
DRAWING TITLE

ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED
DATE: 09/09/24
ZD

DRAWING NUMBER

A2



ANTENNA PLAN

11"x17" SCALE: 3/16" = 1'-0"
24"x36" SCALE: 3/8" = 1'-0"
0 1' 2' 4'

2

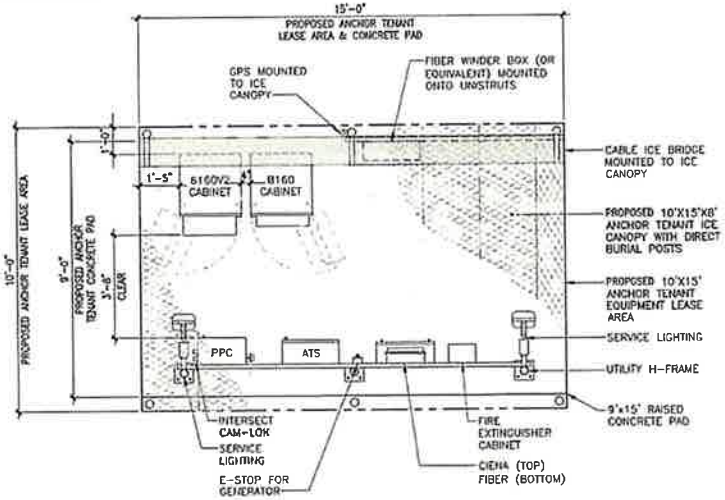
NOT USED

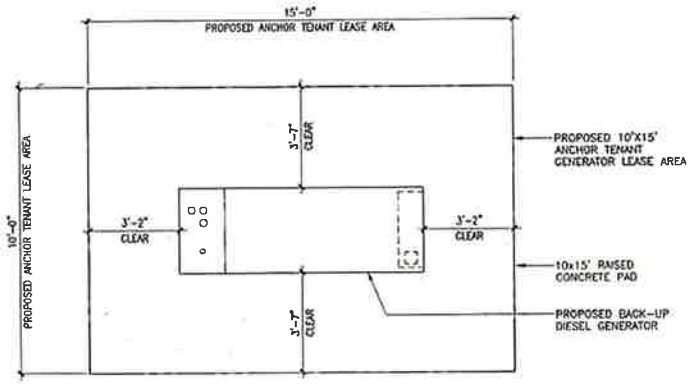
SCALE N.T.S.

3

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

SERVICE LIGHTING SPECIFICATIONS.
MODEL: PLTS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2087 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN

11"x17" SCALE: 1/8" = 1'-0"
24"x36" SCALE: 1/4" = 1'-0"
0 1' 2' 4'

1

CLIENT

verticalbridge

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

SITE ACQUISITION

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

NO	SUBMITTAL REVISION	BY	DATE
0	ISSUED FOR ZONING	JP	09/30/24
A	ISSUED FOR REVIEW	CV	08/19/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE

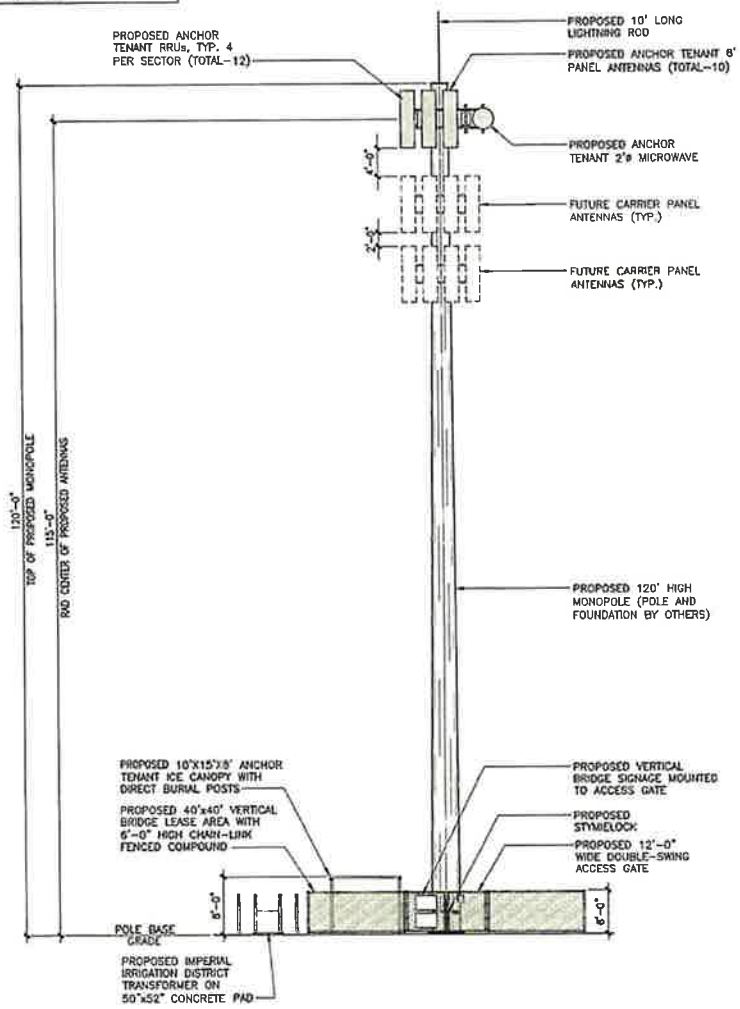
EQUIPMENT AND ANTENNA PLAN

DRAWING SCALE: AS NOTED
DATE: 09/30/24
ZD

DRAWING NUMBER

A3

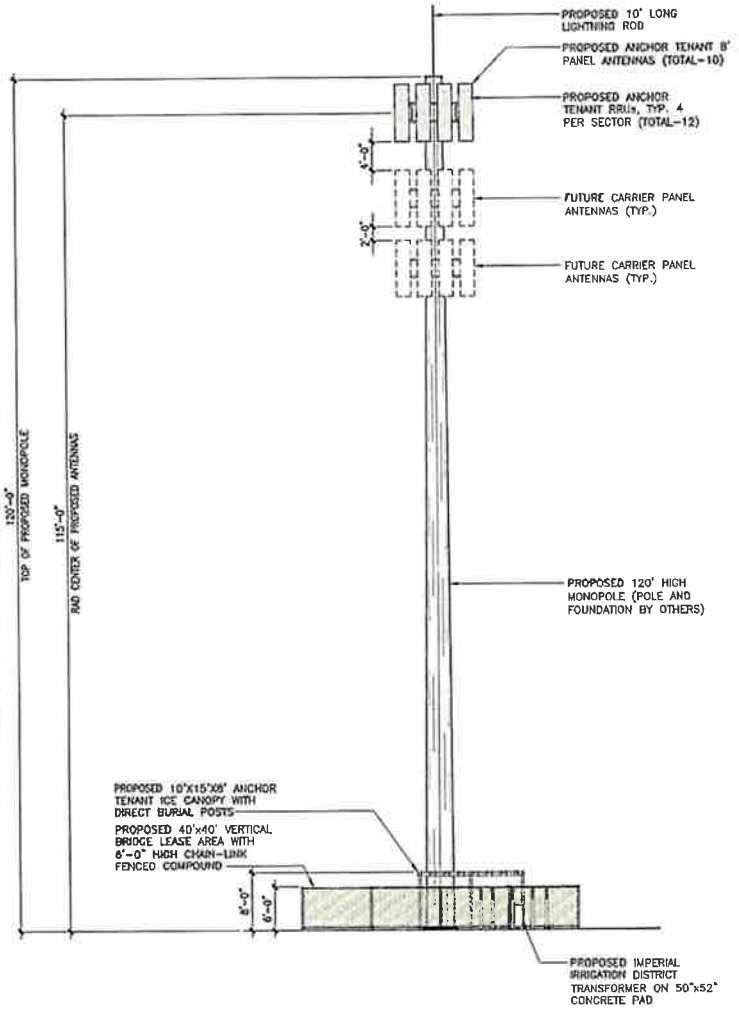
NOTES:
1. ANTENNAS AND RRUS TO BE PAINTED TO MATCH MONOPOLE.



NORTH ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2" 4" 8"

2



EAST ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2" 4" 8"

1

CLIENT

verticalbridge

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

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5078

NO.	SUBMITTAL REVISION	BY	DATE
0	ISSUED FOR ZONING	JH	09/20/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT MANAGER

PROJECT TITLE

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE

ELEVATIONS

DRAWING SCALE
AS NOTED

DATE
09/18/24

ZD

DRAWING NUMBER

A4

ASSURANCE
DEVELOPMENT

Attachment 9

Alternative Sites Analysis

Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

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

Summary

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

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

Collocation on Existing Towers

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

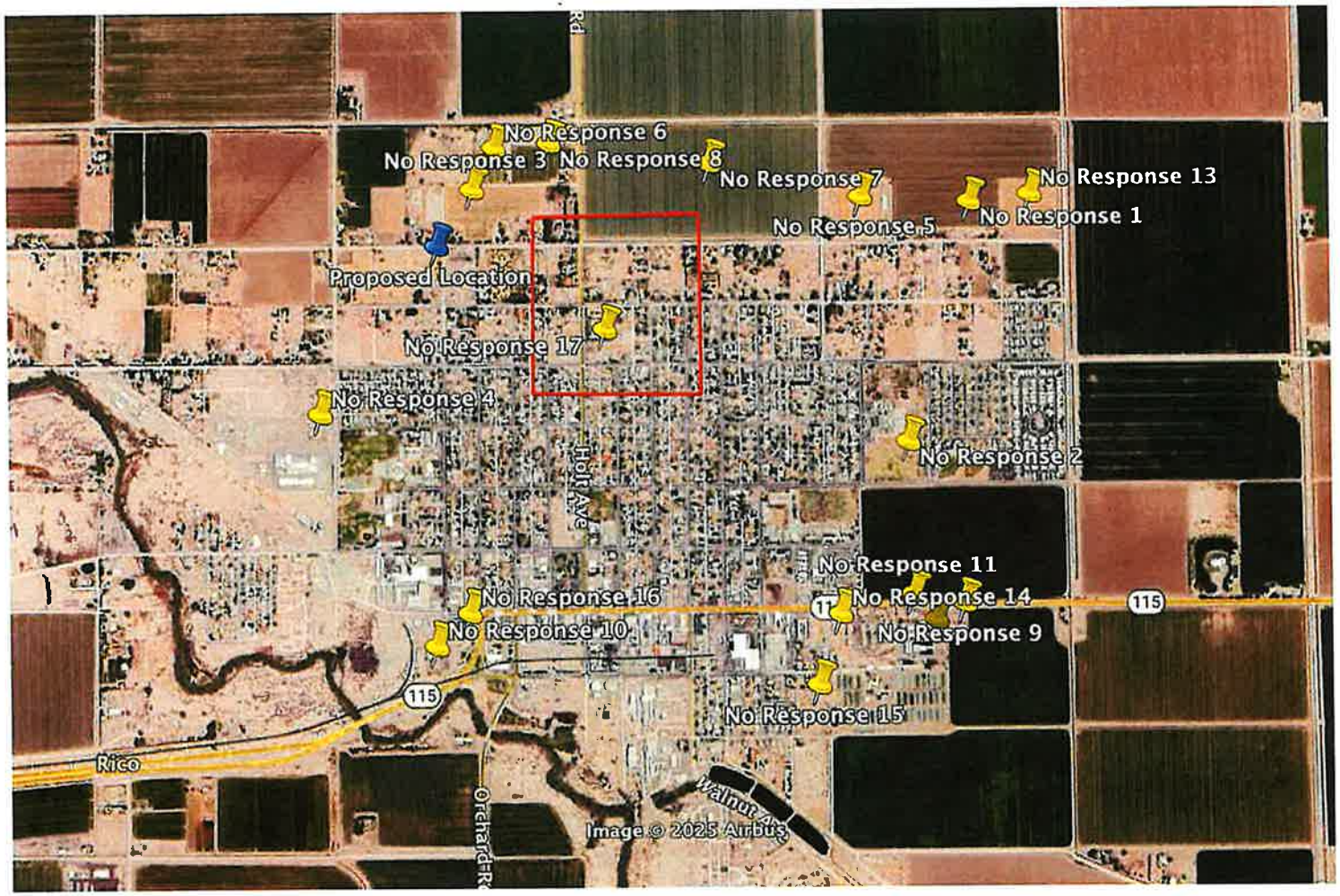
Collocation on Existing Non-Tower Structures @ 119' antenna tip height AGL

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

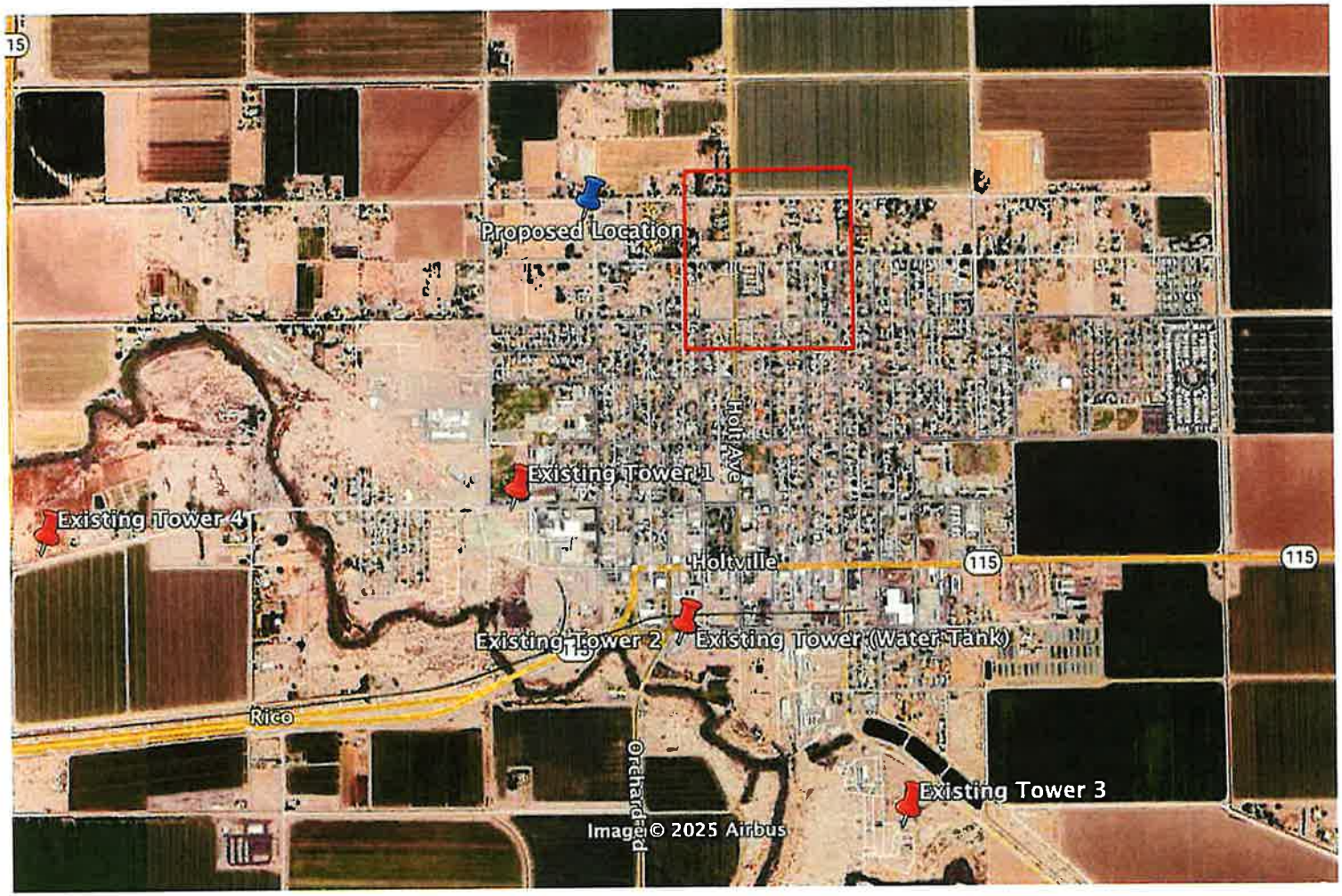
These structures cannot support a tower at the required height while meeting the requirements set forth in Code Section 92401.04(5)(d): "No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted,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

T-Mobile Alternative Candidates Map

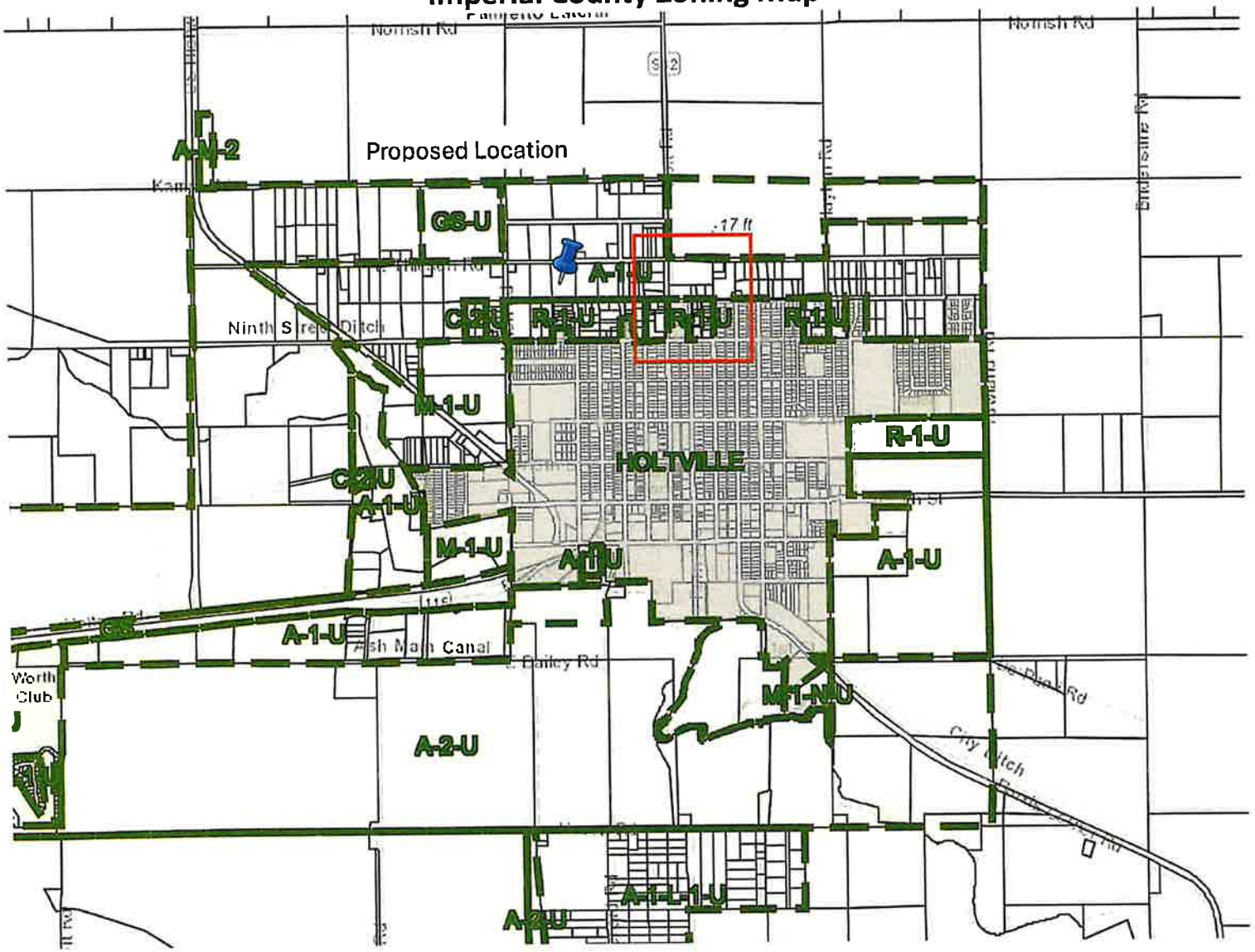
Property Owners Contacted – No Response



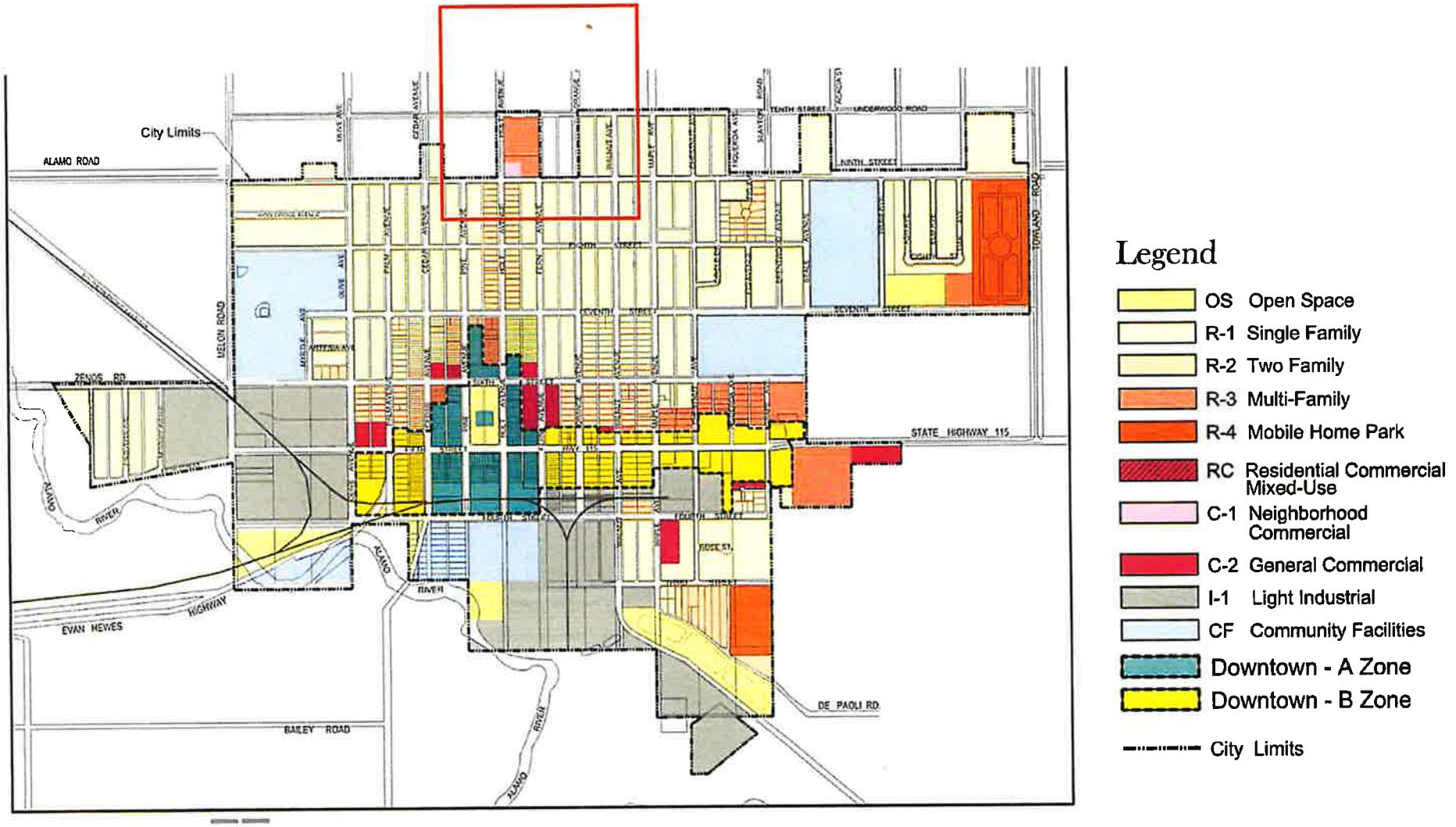
Existing Towers within Search Ring



Imperial County Zoning Map



City of Holtville Zoning Map



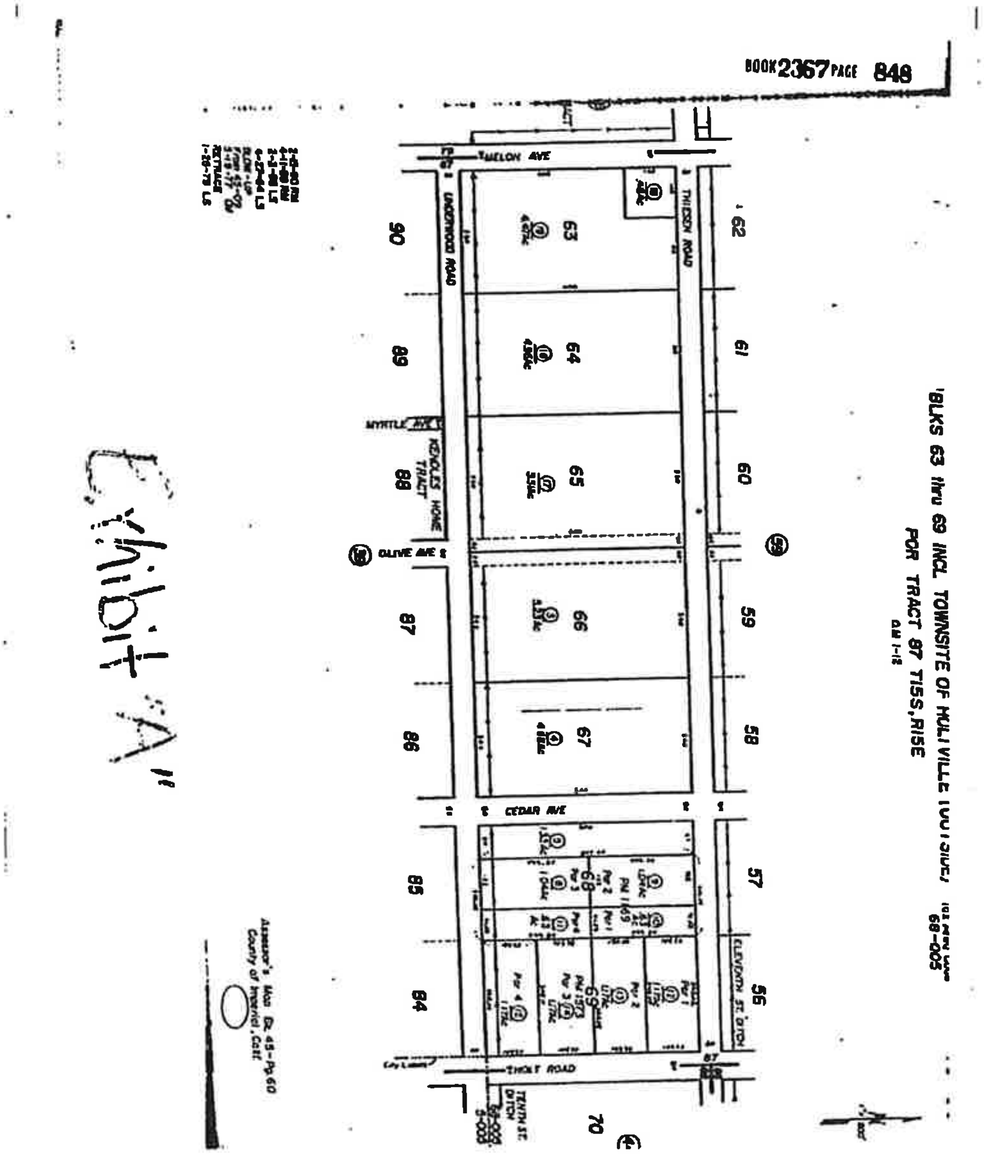
Alternative Analysis Summary - Collocations

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

ASSURANCE
DEVELOPMENT

Attachment 10

Assessor's Parcel Map


BOOK 2367 PAGE 848
BLKS 63 thru 69 INCL TOWNSITE OF HOLTVILLE
POR TRACT 87 T15S,R15E
MELON AVE
OLIVE AVE
CEDAR AVE
THIESEN ROAD
UNDERWOOD ROAD
ELEVENTH ST. DITCH
TENTH ST. DITCH
MYRTLE AVE
Exhibit "A"

ASSURANCE
DEVELOPMENT

Attachment 13

Photo Simulations

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2025

EXISTING

PROPOSED

DISCLAIMER: *THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY*

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

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

verticalbridge

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

VIEW	SHEET
A	1 / 4

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2025

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	1/09/2025	ISSUED FOR SUBMITTAL	JFY

verticalbridge

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

VIEW	SHEET
B	2 / 4

AERIAL MAP

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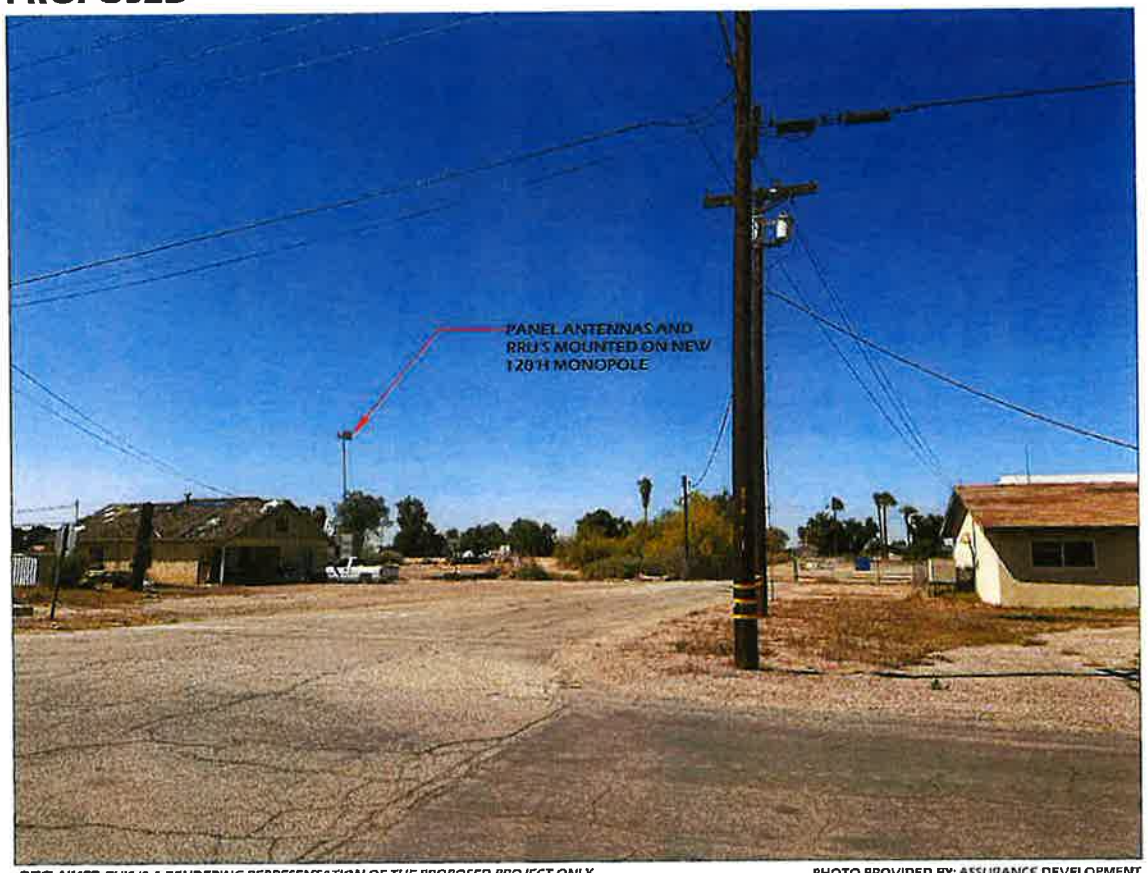
EXISTING

PROPOSED



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DRAFTLINK

ASSURANCE DEVELOPMENT

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

verticalbridge

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

VIEW	SHEET
C	3 / 4

AERIAL MAP

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EXISTING

PROPOSED

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VIEW	SHEET
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DEVELOPMENT

Attachment 14

Equipment Specifications

ERICSSON

AIR 6419 B41

AIR 6419, an Advanced Antenna System (AAS) with 64 transmitters and 64 receivers, improves upon previous generations of product with respect to energy efficiency and deployment capabilities. An Advanced Antenna System (AAS) such as AIR 6419 together with the Massive MIMO and Multi-User MIMO software features enables greater spectral efficiency. Enhanced bitrate per user achieved through interference suppression by applying beamforming capabilities in the downlink and the uplink.

Capacity increased by scheduling users in the cell on different layers supporting both Single User MIMO (SU-MIMO) and Multiuser MIMO (MU-MIMO). Application coverage is improved through beamforming in both the vertical and horizontal dimensions.

To support cost efficient site deployments, AIR 6419 includes Layer 1 beamforming enabling enhanced Common Public Radio Interface (eCPRI) to be used between the AIR 6419 and RAN Compute portfolio products. The increasing capacity demands in operator's networks create needs for new spectrum efficient solutions.

Like its predecessor AIR 6449, AIR 6419 supports different cell or broadcast beam shapes, to meet different user distribution scenarios. The flexibility to steer the transmitted energy for control signaling in both azimuth and elevation enables improved efficiency in various deployments scenarios including Macro, Hotspot and High-rise.

The improved design of AIR 6419 enables faster roll out with minimal site impact, improved mid-band coverage and capacity boost for both existing and new bands compared to the use of traditional radio and antenna systems.

TECHNICAL SPECIFICATIONS AIR 6419 B41

PRODUCT NUMBER:	KRD 901 212/11	
ADVANCED ANTENNA SYSTEM		
Operating frequency band:	3GPP Band 41, 2496 – 2690 MHz (full band)	
Instantaneous bandwidth:	194 MHz	
Output Power	320 W	
EIRP max.	79 dBm	
Antenna configuration	(3x1) x (4x8)	
Architecture:	64T64R connected to an array of dual polarized antenna elements.	
Modulation:	Downlink	Up to 256 QAM.
	Uplink	Up to 64 QAM.
Multi-antenna beamforming functionality*:	Downlink SU-MIMO	
	Downlink MU-MIMO	Up to 16 layers per carrier.
	Uplink SU-MIMO	
	Uplink MU-MIMO	Up to 16 layers per carrier.
	Cell shaping	Pre-defined cell or broadcast beam shapes**; Macro, Hotspot and High-rise.
	Digital down-tilt	Continuously adjustable for macro scenario, fixed for Hotspot and High-rise scenario.
Mechanical specifications*		
Weight:	approx. 37.8 kg (83 lbs) excluding installation kit	
Size (H x W x D):	approx. 921 x 531 x 229 mm (or 36.3" x 20.9" x 9.0") (including protrusions) approx. 894 x 531 x 177 mm (or 35.2" x 20.9" x 7.0") (excluding protrusions)	
Operational specifications*		
Wind Load Maximum:	approx. 650 N (front), 175 N (side) @ 42 m/s wind speed (pole installed)	
Operating Temperature Range:	- 40° to + 55° C	
Solar radiation:	≤ 1,120 W/m²	
Relative humidity:	2% to 100%	
Absolute humidity:	0.26 to 40 g/m³	
IP Classification:	IP65	
Main Interfaces		
Baseband:	Two eCPRI interfaces using 25G SFP+ ports with link capacity 25 Gb/s each. One 25 Gb/s eCPRI interface is sufficient for up to 100 MHz carrier bandwidth and 16 layers.	
Power Supply:	-48 V DC (3-wire or 2-wire) via a connector. Maximum fuse rating is 50 A.	
Mounting:	Optional mechanical tilt and swivel installation kit for wall and pole mounting.	
Handling:	Handle for lifting and hoisting.	

* Preliminary Specifications provided

** Additional scenarios, cells or broadcast beam shapes possible with future software releases. Refer detailed description for more details on NR and EIRP for specific scenarios

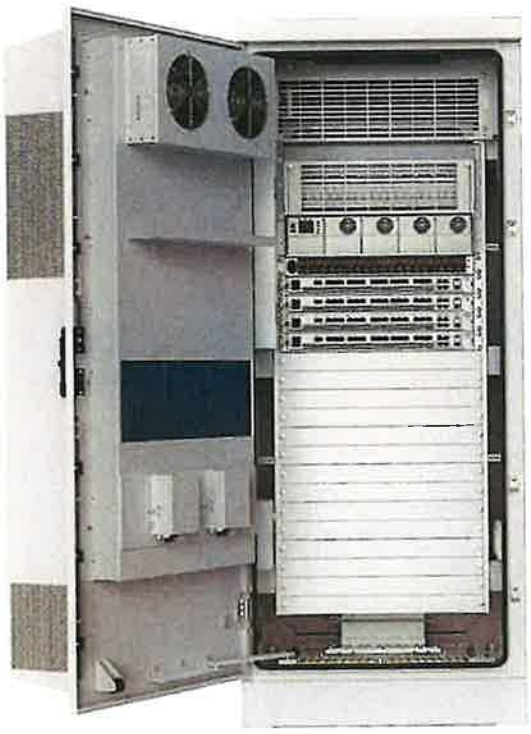
Preliminary PA4
Telefonaktiebolaget LM Ericsson
SE-164 80 Stockholm, Sweden
www.ericsson.com

ERICSSON

Enclosure 6160 AC

UTE6160_AC_V2

The Enclosure 6160 is a multi-purpose site cabinet designed to support a multitude of equipment such as ERS Baseband, Transport, Li-Ion battery and 3PP vendor equipment. It also provides a highly capable power system and battery back-up - all in a streamlined design and minimized footprint to support cost efficient expansion of mobile broadband.



Being an all-in-one enclosure, the Enclosure 6160 is a very fitting choice for all types of sites where the capacity need is large or room for future expansion is needed. It is ideally used for modernizing existing sites or in greenfield scenarios to match both current and future needs.

With a robust design, IP65 compliance and a sealed Heat Exchanger (HEX) climate system the Enclosure 6160 ensures optimal environmental protection of the active equipment - enabling them for a long-lasting service. The complete system is also integrated and verified for the entire Ericsson Radio System and ensures best-in-class service.

The power system offers 31,5kW of power in total and provides 24kW of -48V DC power for both internal and external consumers.

The equipment space allows 19U of rack space ensuring well enough capacity for existing need and future expansion.

One of the main advantages of the Enclosure 6160 is its default integration with ENM - allowing for advanced remote monitoring and control such a fault management (alarms), inventory management and performance measurements. The cabinet also provides an open O&M interface for integration to 3PP O&M systems.

Technical specification for Enclosure 6160 AC V2

CAPACITY	
Rack space user equipment	19U (19" rack) (excluding Compact DCDU)
Hardware capabilities	ERS Baseband and Transport units Power and CPRI support for multi-standard remote radios (RRU or AIR) Li-Ion batteries (19" form factor) 3PP equipment
MECHANICAL SPECIFICATION	
Weight	197 kg (433 Lbs) (excluding user equipment & Rectifier modules. Includes cDCDU, Fiber storage, L-supports & 1U air restrictor plates, etc)
Dimension (H x W x D)	1600 x 650 x 650 mm (includes 4" Base frame) - Foot print 1600 x 650 x 850 mm (includes 4" Base frame) - Includes door 63 x 26 x 26 in. (includes 4 "Base frame) - Foot Print 63 x 26 x 33 in. (includes 4 "Base frame) - Includes door
Base frame height & Weight	4 in. (Ordered seperately and not part of the main cabinet), 17 Kgs 12 in. (Ordered seperately and not part of the main cabinet), 34kg
Rectifier Weight	1.7 Kgs (each) - Configurable from 1 to 9
Mounting position	Ground
Enclosure material	Aluminum
Color	Power paint NCS 2002-B
Door	Front access
Rack type	19" (IEC 60297-3-100)
Locking type	Pad lock or Cylinder
POWER SYSTEM	
Input voltage	3P+N+PE: 346/200-415/240 VAC 2P+N+PE: 208/120-220/127 VAC 1P+N+PE: 200-250 VAC
Cabinet AC Power Rating	250 A (2 x 125 A)
Input power	<33kW
Output load (-48VDC)	24kW (Max user load)
Total capacity (-48VDC)	31.5kW
AC SPD	Class 2/Type 2
DC SPD	Class 2/Type 2
PSU Slots	9x
Service outlet	Optional
Priority load	8x Circuit Breaker
LLVD 1	6x Circuit Breaker
LLVD 2	6x Circuit Breaker
CB ratings (Bullet Style) - default	3A / 5A / 10A / 15A / 20A / 25A / 30A / 40A / 50A / 60A / 80A / 100A
T-Mobile Bullet Style CB combinations	6x 40A, 1x 100A, 1x 200A, 2x 300A
Battery Interface	2x Circuit Breaker
Battery Circuit Breaker rating	125A 2pol (200A)

Telefonaktiebolaget LM Ericsson
SE-164 80 Stockholm, Sweden
www.ericsson.com

287 01-FGC 101 1406 Rev C

PSU capacity	3500W
PSU efficiency	96%
PSU output voltage (nominal)	-48VDC
PSU rated current	73A
PSU power factor	≥0.99
PSU emissions	EN 55022 Class B
Ingress protection power system	IP20
DC Distribution Unit – T-Mobile config	
Output load (-48VDC)	9kW
CB slots	20x
CB ratings	4x 6A, 4x 10A, 8x 20A

ENVIRONMENTAL SPECIFICATION

Ingress protection	IP65
Environment	Class 1.2 (Storage) Class 2.3 (Transport) Class 4.1 (Operation) ETSI EN 300 019-1-1
Relative humidity	15-100%

CLIMATE SYSTEM

Type	Heat Exchanger
Temperature range	-33°C to +50°C* -27°F to +122°F*
Cooling capacity (Total)	3700W
Heater	2x 500 Watts
Smart OAM	Hardware prepared for FM, PM & Inventory data
Acoustic Noise (dB)	70 dB average @ full load @ Horizontal distance of 1.5 M and vertical distance of 1 Meter

STANDARDS COMPLIANCE

	UL 62368-1, UL 60950-22, UL 50E Telcordia GR-63-CORE Telcordia GR-487-CORE Telcordia GR-1089-CORE

CABLE I/O

Entry point	Bottom
Plinth cable access	Rear and side access
General	1x Ø16-35mm
DC Out (shielded)	18x Ø10-18mm
DC In (battery feed)	4x Ø19mm
Signal Cable Outlet	10x Ø10mm
Signal Cable Inlet	8x Ø6mm
Optical	22x Ø6mm
Conduits knock-out plates	6x Ø2"
Punched holes	3x Ø26mm

REMOTE MANAGEMENT

External Alarms (Dry Contact)	32x
Smart Alarms	Hardware Prepared
Controller interface northbound	IP / Electrical Ethernet
FM, PM, CM & IM	Please refer to Controller 6610 Datasheet

*Configuration dependent – please refer to CPI

Telefonaktiebolaget LM Ericsson
SE-164 80 Stockholm, Sweden
www.ericsson.com

Enclosure B160

Enclosure B160
AirCon + VRLA

Enclosure B160
AirCon + Li-Ion

Enclosure B160
Convection Cooling
+ VRLA

Enclosure B160

Capacity
- VRLA 12V: 100Ah / 150Ah / 170Ah / 190Ah / 210Ah
- Li-Ion: 24U 19" / 23"
- Sodium-Nickel: 3x FIAMM

Electrical specification
- DC Output: -48VDC/200A
- Battery breakers: 2x 125/2p
- Alarms: Door open, Climate failure, MCB Connection

Mechanical specification
- Weight: 134kg
- Dimensions: 63 x 26 x 26 in. (incl. Base frame)
- Base frame height: 6 in.
- Material: Galvanized steel (180g/m^2)
- Color: Powder paint NCS 2002-B
- Door: Front access
- Locking type: Pad lock / cylinder

Environmental specification
- Ingress protection: VRLA/Sodium IP44
Li-Ion IP55
- Relative humidity: 15-100%

Climate system
- Air Conditioner
  - Fan type: DC
  - Cooling capacity: 500W @L35/L35
- Convection cooling
  - Emergency fan

ERICSSON

Radio 4460

Product features
Radio 4460 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x140 W in total and up to 4x80 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4460 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

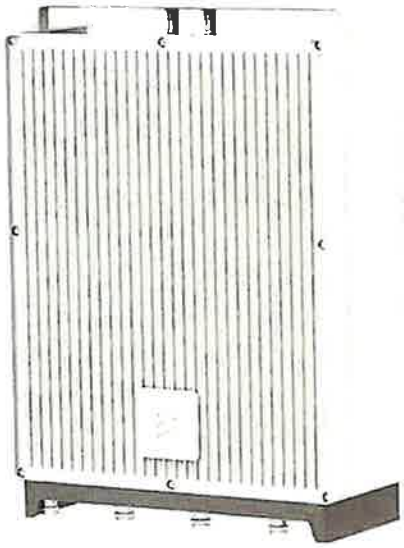
Radio 4460 provides support for AISG TMA and RET towards the antenna system.

It supports GSM, WCDMA, LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT) with GSM in mixed mode.

Radio 4460 also supports up to 4 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

ERICSSON

Radio 4480



Product features
Radio 4480 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x100 W in total and up to 4x60 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4480 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

Radio 4480 provides support for AISG TMA and RET towards the antenna system.

It supports LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT).

Radio 4480 also supports up to 2 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4480 **PRODUCT NUMBER: KRC 161 922/1**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 71 and Band 85A

HW CAPACITY:
IBW: Up to 35 MHz in B71, Up to 17 MHz in B85A
MIMO: Yes, 4T/4R
Output power: Up to 4 x 60 W in B71, Up to 4 x 60 W in B85A. Up to 100 W in total

INTERFACE SPECIFICATIONS:
Power supply: 1 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 1, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 42 kg (93 lbs)
Volume: approx. 41 l (11 gal)
Dimensions (HxWxD): 553mm x 398mm x 190mm (21.8"x15.7"x7.5") (incl. protrusions)
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65 .
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4460 **PRODUCT NUMBER: KRC 161 912/3**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 2/25 and Band 66

HW CAPACITY:
IBW: Up to 65 MHz in B2/25, Up to 90 MHz in B66
MIMO: Yes, 4T/4R
Output power: Up to 4 x 80 W in B2/25, Up to 4 x 80 W in B66. Up to 140 W in total

INTERFACE SPECIFICATIONS:
Power supply: 2 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 4, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 49.5 kg (109 lbs)
Volume: approx. 50 l (13 gal)
Dimensions (HxWxD): 432mm x 384mm x 301mm (17.0 x 15.1" x 11.9")
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

ASSURANCE
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Attachment 15

T-Mobile Coverage Maps

REGIONAL NETWORK ENGINEERING & OPERATIONS

Customer Driven. Locally Focused. Magenta Built.

COVERAGE & CAPACITY OBJECTIVES ENGINEERING JUSTIFICATION

US-CA-5363 Holtville

12/27/2024

Prepared by: Alexandre Renaldino

PREDICTION TOOL OUTPUT
SERVICE WITH THE PROPOSED SITE

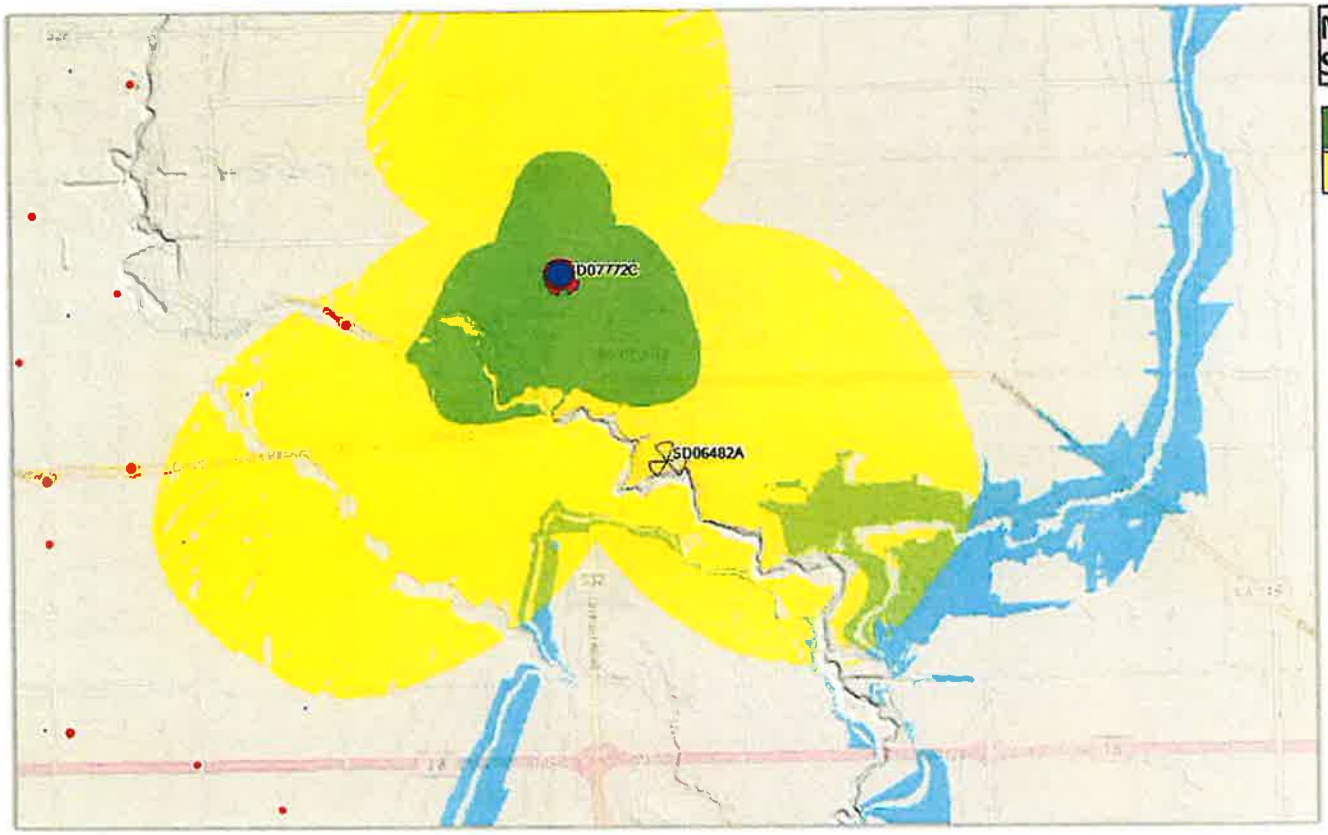
MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

REGIONAL NETWORK ENGINEERING & OPERATIONS
Customer Driven. Locally Focused. Magenta Built.

PREDICTION TOOL OUTPUT
SERVICE WITH ONLY THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

REGIONAL NETWORK ENGINEERING & OPERATIONS
Customer Driven. Locally Focused. Magenta Built.

PREDICTION TOOL OUTPUT
EXISTING SERVICE WITHOUT THE PROPOSED SITE

MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

REGIONAL NETWORK ENGINEERING & OPERATIONS
Customer Driven. Locally Focused. Magenta Built.

ASSURANCE
DEVELOPMENT

Attachment 16

EME Report

RADIO FREQUENCY - ELECTROMAGNETIC ENERGY (RF-EME) COMPLIANCE REPORT

Report Type: Antenna Modification/Theoretical

Site ID: SD07772C

Site Name: SD07772C

Address: 1734 E Underwood Rd, Holtville, CA 92250

Date of Calculation: January 14, 2025

Date of Report: January 14, 2025

Latitude: 32.821699 N
Longitude: -115.38638 W

Prepared By:

GTA
Global Technology Associates
Solutions for a Wireless World

TABLE OF CONTENTS

1.0 Executive Summary / Report Summary

Purpose of Report

Global Technology Associates (GTA) has been contracted by T-Mobile to conduct radio frequency electromagnetic (RF-EME) modeling for T-Mobile site **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250** to determine RF-EME exposure levels from existing and proposed T-Mobile wireless communications equipment at this site.

This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields. This report contains a detailed summary of the RF-EME analysis for the site.
As described in greater detail in the Section titled **"Federal Communications Commission (FCC) Requirements"** of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general population exposures and occupational exposures. This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

T-Mobile Site Summary			
Site ID	SD07772C	Street Address	1734 E Underwood Rd,
Site Name	SD07772C	City, State, Zip	Holtville, CA 92250
Site Type	monopole	Latitude	32.821699 N
Classification	general population	Longitude	-115.38638 W
Access Restrictions	uncontrolled	Access Type	wide double swing gate
Site Description	all the antennas are mounted on the monopole		
Max Predictive RF-EME at T-Mobile Facility (General Population)	8.6% of FCC's general population limit at ground level		
Max Predictive RF-EME at Ground Level (General Population)	8.6% of FCC's general population limit		
Predictive RF-EME Analysis at T-Mobile Facility	The Proposed Antenna Configuration is In Compliance With FCC Rules & Regulations Upon Completion of the GTA Recommendations.		

Table 1

A result of over 100% does not make a site out of compliance with FCC guidelines. For predicted EME over 100% of the applicable FCC limit, further remediation (e.g. signage and/or barriers preventing access) is required to consider the site compliant. Areas exceeding the FCC limit are presented with the barriers and appropriate signages. Accessible areas outside the demarcated are the safety zones that have predicted EME values below the FCC's limits. Installation of the recommended mitigation or remediation measures brings the site into compliance. The predictions model antennas as if they are operating at full power, and this assumption yields a worst-case scenario with more conservative results. On-site measurements may yield different results, as antennas do not always operate at full capacity.

Site ID: SD07772C

Methodology

The site to be determined as the compliance is based on theoretical modeling using the RoofView® modeling tool, appropriate RF signage placement recommendations, proposed antenna inventory as provided by T-Mobile in the construction drawings and the type & level of restricted access to the antennas at the site.

Compliance Statement

T-Mobile's operation at **1734 E Underwood Rd, Holtville, CA 92250** will comply with FCC rules and regulations upon completion of recommendations that include the installation of appropriate RF Safety Signages and/or Barriers as described in Section 8.

Actions for Site Compliance

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance. If required, RF alert signage recommendations have been proposed based on theoretical analysis of MPE levels. Where applicable, barriers can consist of locked doors, fencing, railing, rope, chain, paint striping or tape, combined with RF alert signage.

T-Mobile will be compliant when the following changes are implemented:

T-Mobile proposed Access Point Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Access Point location, as depicted in the site map in the later sections of the report.

T-Mobile proposed Alpha Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Beta Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Gamma Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Equipment/BTS Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Equipment/BTS location, as depicted in the site map in the later sections of the report.

2.0 MPE Calculations

For this MPE predictive analysis, GTA considered the area around the accessible areas of the T-Mobile antennas on the site to determine EME field strength levels for the FCC's human exposure limits. Further GTA has identified any areas with higher levels exceeding FCC MPE limits and then determined spatially averaged field levels in areas with highest fields.

GTA has utilized computer-generated modeling software RoofView® 4.15 to generate the compliance report.

Modeling & Input Assumptions

In this Site Compliance Report, it is assumed that

- All antennas are operating at full power at all times.
- The Antenna Inventory Table (Section 3) shows all transmitting antennas at the site.
- A 100 % duty cycle and maximum radiated power for each antenna is assumed unless T-Mobile has specified otherwise.
- Obstructions like (screens, trees, buildings, etc.) that would normally attenuate the signal are not taken into account.
- GTA obtained information used in this Compliance Report from T-Mobile which is considered reliable and believes it to be true and correct.
- Due to the complexity of some wireless sites, GTA performed this analysis and created this report utilizing best industry practices and due diligence. The scales and the determinations are based on the A&E drawings provided by T-Mobile.
- On a case-by-case basis, appropriate static gains and losses are considered while doing the simulations to simulate the closest field radiations of the antennas.

3.0 Antenna Inventory

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
S1A1	L600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L700	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A4	N2500	ERICSSON	AIR6419 B41	0	116.90
S2A2	L600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L700	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A5	N2500	ERICSSON	AIR6419 B41	130	116.90
S3A3	L600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L700	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A6	N2500	ERICSSON	AIR6419 B41	220	116.90

Table 2

4.0 Federal Communications Commission (FCC) Requirements

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radio frequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general population.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is transient as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

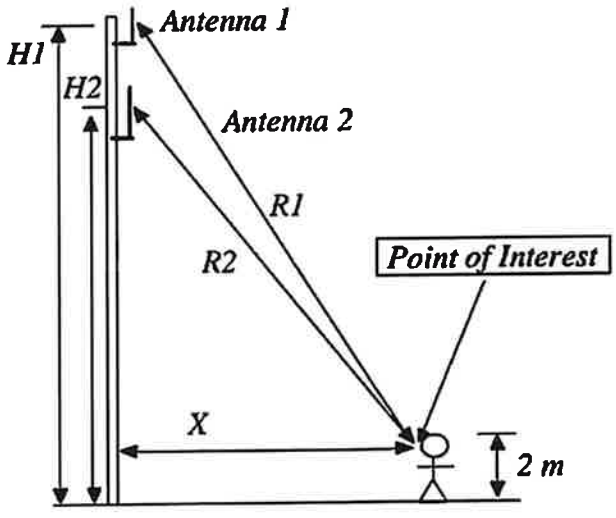


Figure 1

Table 3 and Figure 2 (below), which are included in the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm2) and an uncontrolled MPE of 1 mW/cm2 for equipment operating in the 1900 MHz frequency range. For the T-Mobile equipment operating at 800 MHz, the FCC's occupational MPE is 2.66 mW/cm2 and an uncontrolled MPE of 0.53 mW/cm2. These limits are considered protective of these populations.

(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
0.3-3.0	6|4	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Population/Uncontrolled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
0.3-1.34	6|4	1.63	(100)*	30
1.34-30	1842/f	2.19/f	($180/f^2$)*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

Table 3

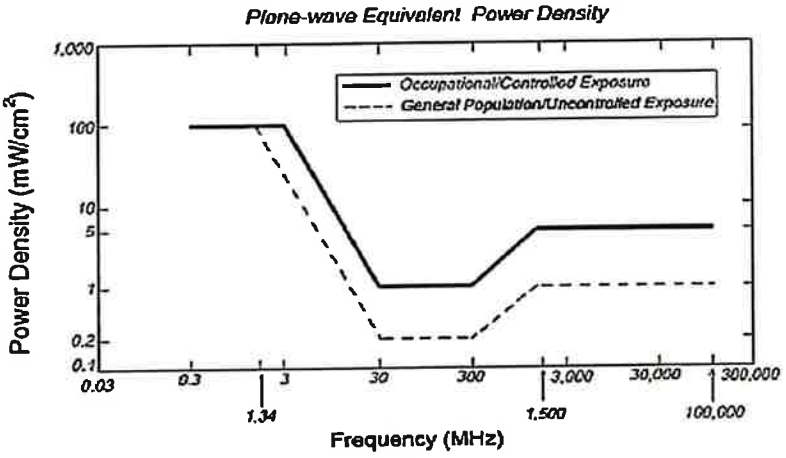


Figure 2

Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Most Restrictive Freq. Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

Table 4

Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Facilities typically consist of:

1) Electronic transceivers (the radios or cabinets) connected to wired telephone lines; and
2) Antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, except in areas directly in front of the antennas.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 100% of the applicable MPE must participate in mitigating these RF hazards.

5.0 Limitations

This report was prepared for the use of T-Mobile. It was performed following generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under similar circumstances. The conclusions provided by GTA are based solely on the information provided by T-Mobile. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to GTA so that our conclusions may be revised and modified, if necessary. This report has been prepared by Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

6.0 Safety Recommendations

Occupational Safety and Health Administration (OSHA) Requirements

OSHA requires that those in the Occupational classification must complete training in RF Safety, RF Awareness, and Utilization of Personal Protective Equipment. OSHA also provides options for Hazard Prevention and Control:

Hazard Prevention	Control
• Utilization of good equipment • Enact control of hazard areas • Limit exposures • Employ medical surveillance and accident response	• Employ Lockout/Tag out • Utilize personal alarms & protective clothing • Prevent access to hazardous locations • Develop or operate an administrative control program

Table 5

RF Signage and Barriers

All RF signs should be obeyed by at all times.

Figure 3

If there are workers in an area with a sign that they do not understand, they can call the NOC Number at 877-611-5868 for guidance.

7.0 Federal Communications Commission (FCC) Limits

Contribution to Co-Located areas

Any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance. All co-located sites should have a separate 5% modeling that shows only T-Mobile antennas transmitting. This separate modeling indicates T-Mobile's contribution in all areas that is recognized to be greater than 100% MPE limits.

Occupational Limits

Apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

General Population limits

Apply in situations in which the general population may be exposed, or in which persons who are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. (Those without significant and documented RF Safety & Awareness training)

Controlled Environment

This applies to environments that are restricted or "controlled" to prevent access from members of the General Population classification.

Uncontrolled Environment

This applies to environments that are unrestricted or "uncontrolled" that allow access from members of the General Population classification.

Generic Values

The use of "Unknown" for an operator means the information about the carrier, their FCC license, and/or antenna information was not available. Generic values are used as estimation for Effective Radiated Power (ERP) and antenna characteristics for unknown antennas.

8.0 Compliance Measures

The site needs the following mitigation and/or compliance plan.

The compliance determination is based on theoretical modeling, RF signage placement recommendations, proposed antenna inventory and the level of restricted access to the antennas at the site. At the time of our analysis, T-Mobile will be complaint with the FCC rules and regulations, as described in OET Bulletin 65 upon implementation of below remediation and/or compliance recommendations.

On monopole :

Recommendations for Site Compliance	Signages on Access Points, Sectors & Equipment										Enclosing Sectors					
																			
	Guidelines		NOC INFO		NOTICE		CAUTION		WARNING		NOTICE		CAUTION		WARNING		OC Length	GP Length	Striping
Access Point(s)	✓	1	✓	1	✓	1													Striping
Sector Alpha							✓	1											Striping
Sector Beta							✓	1											Striping
Sector Gamma							✓	1											Striping
Equipment/BTS	✓	1	✓	1	✓	1													Striping
Total Signage	2		2		2		3		0		0		0		0		0 sq. ft.	0 sq. ft.	Total =0 sq.ft.

Table 6

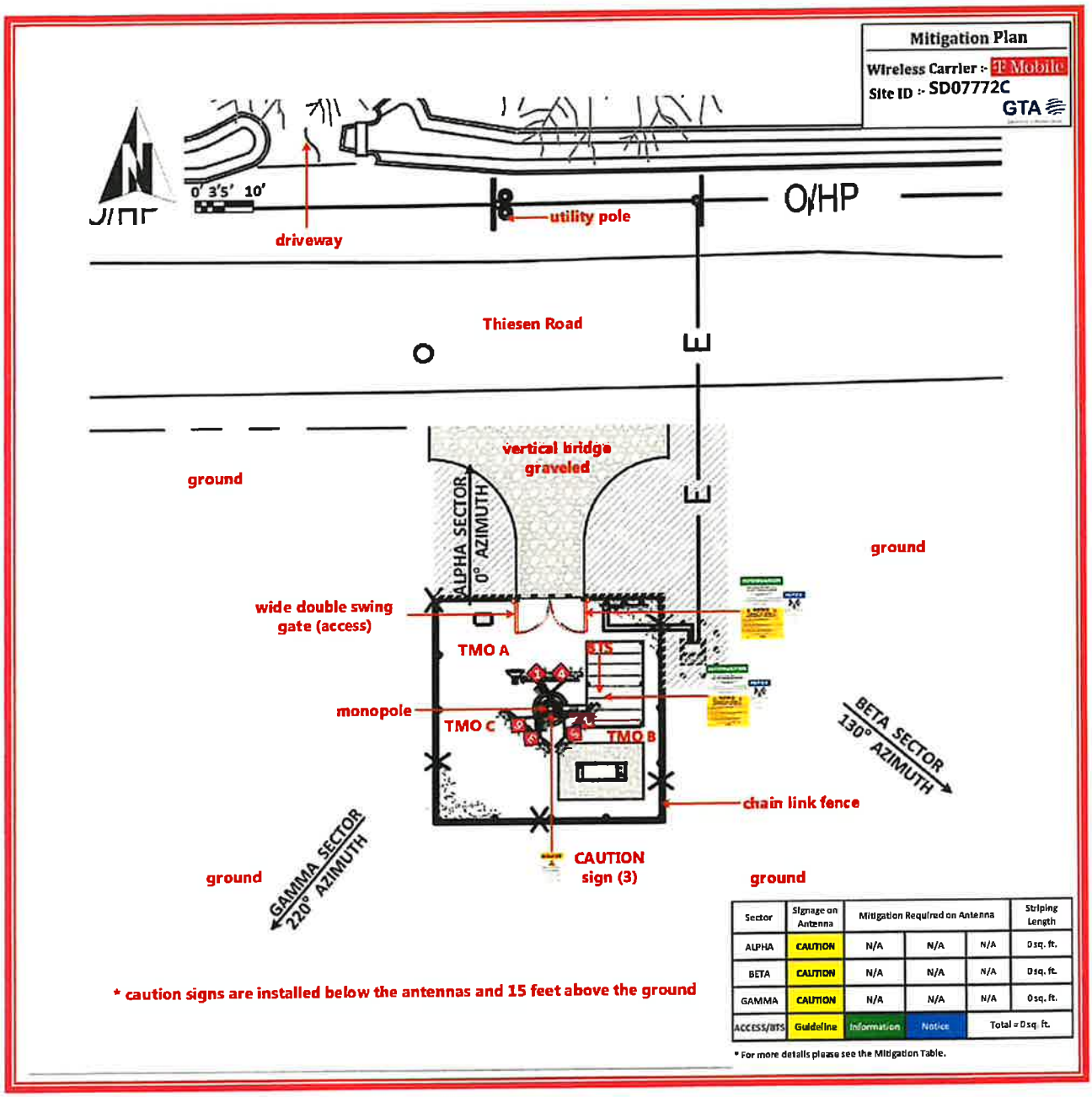
CAUTION: - The table above represents EVERY compliance item that MUST be implemented by the carrier at the site location; please see the Site Plan shown in diagram 1.

It is recommended to have periodic inspections of the components that are involved in the radiation of RF energy. Periodic Electromagnetic Emission (EME) measurement should be conducted to reevaluate the RF radiation level at this site.

GTA recommends that T-Mobile and the authorized personal at the site take additional measures to ensure that persons accessing the roof (for example, roofers or other maintenance workers) are informed of areas where RF levels exceed the FCC general population limit and made aware that these areas must be avoided to maintain compliance with FCC requirements. This is important especially when the placement of barriers, striping, taping, or any other positive access control (areas of the roof that exceed the RF levels of the general population limit) is not possible due to the physical construction or constraints or safety measures surrounding the antennas or on the roof like the sloped roof, tiled roof, chimney, steeples, cupolas, hilly terrain, etc.

It is further recommended to distribute this report to anyone accessing the roof and ensure the confirmation that it has been read and understood.

Diagram 1: Site Scale Plan



Sector	Signage on Antenna	Mitigation Required on Antenna			Striping Length
ALPHA	CAUTION	N/A	N/A	N/A	0 sq. ft.
BETA	CAUTION	N/A	N/A	N/A	0 sq. ft.
GAMMA	CAUTION	N/A	N/A	N/A	0 sq. ft.
ACCESS/BTS	Guideline	Information	Notice	Total = 0 sq. ft.	

9.0 Summary And Conclusions

GTA has prepared this Radiofrequency Emissions Compliance Report for the proposed T-Mobile telecommunications equipment at the site located at **1734 E Underwood Rd, Holtville, CA 92250.**

GTA has conducted theoretical modeling to estimate the worst-case power density from T-Mobile antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements.

As presented in the preceding sections, based on worst-case predictive modeling, **there are no modeled exposures on any accessible ground-level walking/working surface** related to proposed equipment in the area that exceed the FCC's **general population** exposure limits at this site. Any of the modeled exposure areas exceeding the **general population** limits need to follow the mitigation/compliance plan proposed in the report to bring the T-Mobile antennas to compliance. As such, the proposed T-Mobile project complies with FCC rules and regulations. **Posting of the signages and the recommendations** presented in Section 8 **brings the site into compliance with FCC rules and regulations.**

At ground-level the anticipated maximum predictive RF-EME at T-Mobile facility will be 8.6% of FCC's general population limit. This was determined through calculations along a radial from each sector taking full power values into account as well as actual vertical plane antenna gain values per the manufacturer-supplied specifications for gain. Based on worst-case predictive modeling, there are no areas at ground level related to the proposed antennas that exceed the FCC's occupational or general population exposure limits at this site. **At ground level, the maximum power density generated by the antennas is approximately 8.6% of FCC's general population limit (1.72% of the FCC's occupational limit).**

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

Modeling indicates that there will be no accessible areas on the walking/working surfaces at the ground-level in front of the T-Mobile antennas that may exceed the FCC standards for the general population and/or occupational exposure after the implementation of mitigation measures. To reduce the risk of exposure and/or injury, GTA recommends that access to the **monopole** or areas associated with the active antenna installation or mitigation measures are restricted and secured where possible.

To alert any workers or general population potentially accessing the site, a blue Notice sign and/or yellow Caution sign, and/or orange Warning sign based on the simulated exposure limits along with a yellow Guidelines sign are recommended for installation at the access to the rooftop/structure along with the barriers/striping to exclude the RF radiations exceeding areas per the applicable limits.

10.0 Certification

This report has been prepared under the direction of the following Registered Professional Engineer:

I **Michael A. McGuire PE**, on the date indicated near my seal below hereby certify that:

I am registered as a Professional Engineer with the License number listed below and I am thoroughly familiar with the Regulations of the Federal Communication Commission (FCC), both in general and specifically, as they apply to FCC guidelines for human exposure to Radiofrequency electromagnetic radiation and the EME predictive analysis for the site identified as **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250**, has performed on **January 14, 2025** to determine where there might be electromagnetic energy that is more than both the Controlled Environment and Uncontrolled Environment levels; and that I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge.

sealed 20jan2025

ASSURANCE
DEVELOPMENT

Attachment 17

Co-Location Letter of Intent

Vertical Bridge Holdings, LLC
750 Park of Commerce Drive, Suite 200
Boca Raton, FL 33487
561-948-6367
VerticalBridge.com

December 23, 2024

Imperial County
Planning and Land Use Division
801 Main St.
El Centro, CA 92243

Re: VB BTS III, LLC Telecommunication Tower Application (Parcel ID # 045-600-017)
Site Name and Number: Holtville / US-CA-5363

To Whom it May Concern:

By this letter of intent, VB BTS III, LLC, as the proposed owner of the tower, commits to allowing the shared use of the tower for co-location of other antennae, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-locating company.

We appreciate your time and attention to this matter.

Sincerely,

VB BTS III, LLC.

By: _____
Name: _____
Title: Vice President Development
Date: 1/6/25

Vertical Bridge Holdings, LLC
750 Park of Commerce Drive, Suite 200
Boca Raton, FL 33487
561-948-6367
VerticalBridge.com

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 6th day of January, 2025, by means of ☐ physical presence or ☐ online notarization by VB BTS II, LLC, a Delaware limited liability company.

Jeanne M Bruning
Signature of Notary Public

Jeanne M Bruning
Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known ✓ OR Produced Identification _____

JEANNE M. BRUNING
MY COMMISSION # HH 489847
EXPIRES: April 20, 2028

ASSURANCE DEVELOPMENT

Attachment 18

FAA TOWAIR Report

Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V_2018 2.0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference CFR Title 14 Part 77.9.

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

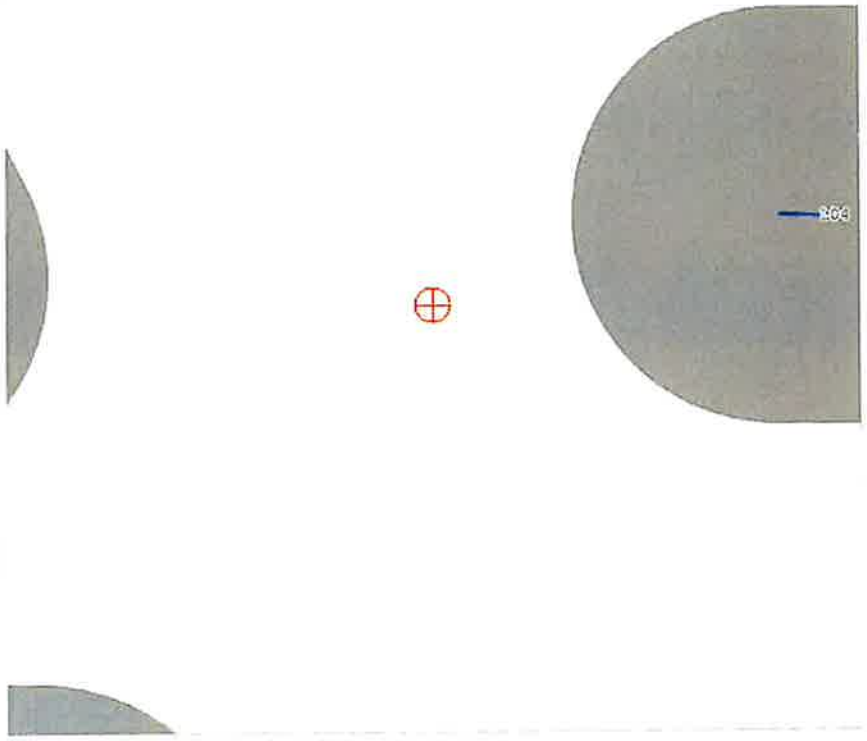
If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the Air Traffic Areas of Responsibility map for Off Airport construction, or contact the FAA Airports Region / District Office for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

* **Structure Type:**	TOWER | Antenna Tower Please select structure type and complete location point information.
Latitude:	32 Deg 49 M 18.25 S N
Longitude:	115 Deg 23 M 10.98 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	22 (nearest foot)
Structure Height :	130 (nearest foot)
Is structure on airport:	(●) No ( ) Yes

Results

You do not exceed Notice Criteria.



Antenna Structure Registration

TOWAIR Determination Results

HELP

New Search Printable Page

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates	
Latitude	32-49-18.2 north
Longitude	115-23-10.9 west
Measurements (Meters)	
Overall Structure Height (AGL)	39.6
Support Structure Height (AGL)	36.6
Site Elevation (AMSL)	6.7
Structure Type	
MTOWER - Monopole	

Tower Construction Notifications
Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Phone: 1-877-480-3201
TTY: 1-717-338-2824
Submit Help Request

ATTACHMENT "F" – ALUCP SECTION

2

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 overflights. Other impacts sometimes created by airports (e.g., air pollution, automobile traffic, etc.) are beyond the scope of this plan. These impacts are within the authority of other local, state, and federal agencies and are addressed within the environmental review procedures for airport development.

3. Types of Actions Reviewed

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

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

(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.

Table 2A

Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

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

Zone	Additional Criteria		Examples	
	Prohibited Uses	Other Development Conditions	Normally Acceptable Uses	Uses Not Normally Acceptable
A	• All structures except ones with location set by aeronautical function • Assemblages of people • Objects exceeding FAR Part 77 height limits • Hazards to flight[6]	• Dedication of avigation easement	• Aircraft tiedown apron • Pastures, field crops, vineyards • Automobile parking	• Heavy poles, signs, large trees, etc.
B1 and B2	• Schools, day care centers, libraries • Hospitals, nursing homes • Highly noise-sensitive uses • Above ground storage • Storage of highly flammable materials • Hazards to flight[6]	• Locate structures maximum distance from extended runway centerline • Minimum NLR[7] of 25 dBA in residential and office buildings • Dedication of avigation easement	• Uses in Zone A • Any agricultural use except ones attracting bird flocks • Warehousing, truck terminals • Single-story offices	• Residential subdivisions • Intensive retail uses • Intensive manufacturing or food processing uses • Multiple story offices • Hotels and motels
C	• Schools • Hospitals, nursing homes • Hazards to flight[6]	• Dedication of overflight easement for residential uses	• Uses in Zone B • Parks, playgrounds • Low-intensity retail, offices, etc. • Low-intensity manufacturing, food processing • Two-story motels	• Large shopping malls • Theaters, auditoriums • Large sports stadiums • Hi-rise office buildings
D	• Hazards to flight[6]	• Deed notice required for residential development	• All except ones hazardous to flight	

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/imperlt.