

# PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION  
COMMITTEE

AGENDA DATE: September 9, 2021

FROM: PLANNING & DEVELOPMENT SERVICES

AGENDA TIME: 1:30 PM / No. 1

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

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

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

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

GENERAL PLAN FINDINGS  CONSISTENT  INCONSISTENT  MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: \_\_\_\_\_

APPROVED  DENIED  OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: \_\_\_\_\_

APPROVED  DENIED  OTHER

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

NEGATIVE DECLARATION  MITIGATED NEGATIVE DECLARATION  EIR

## DEPARTMENTAL REPORTS / APPROVALS:

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

OTHER: Quechan Historic Preservation, Imperial Irrigation District, IVECA

## REQUESTED ACTION:

(See Attached)

- NEGATIVE DECLARATION**  
 **MITIGATED NEGATIVE DECLARATION**

*Initial Study & Environmental Analysis*  
*For:*

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



*Prepared By:*

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

**September 2021**

**EEC ORIGINAL PKG**

# TABLE OF CONTENTS

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

**FEC ORIGINAL PKG**

---

## SECTION 1 INTRODUCTION

### A. PURPOSE

This document is a  policy-level,  project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #21-0009, where the intent of the project is to build and maintain a 40-foot monopole, antenna, and waveguide in the rear yard to extend services to the United States Department of Defense Special Operations Forces Desert Warfare Training Facility. (Refer to Exhibit "A" & "B").

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

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

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

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

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

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

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

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

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County

**FEC ORIGINAL PKG**

---

of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

### **C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION**

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

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

### **D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION**

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

#### **SECTION 1**

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

#### **SECTION 2**

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

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

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

#### **SECTION 3**

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

**FEC ORIGINAL PKG**

---

**IV. PERSONS AND ORGANIZATIONS CONSULTED** identifies those persons consulted and involved in preparation of this Initial Study and Negative Declaration.

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

**VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL**

**VII. FINDINGS**

**SECTION 4**

**VIII. RESPONSE TO COMMENTS (IF ANY)**

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

**E. SCOPE OF ENVIRONMENTAL ANALYSIS**

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

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.
2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.
3. **Less Than Significant With Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".
4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

**F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS**

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

**G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE**

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

**1. Tiered Documents**

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

**FEC ORIGINAL PKG**

---

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

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

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

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

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

- (1) Were not examined as significant effects on the environment in the prior EIR; or
- (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means."

## 2. Incorporation By Reference

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

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

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

- 
- These documents must summarize the portion of the document being incorporated by reference or briefly describe information that cannot be summarized. Furthermore, these documents must describe the relationship between the incorporated information and the analysis in the tiered documents (CEQA Guidelines Section 15150[c]). As discussed above, the tiered EIRs address the entire project site and provide background and inventory information and data, which apply to the project site. Incorporated information and/or data will be cited in the appropriate sections.
  - These documents must include the State identification number of the incorporated documents (CEQA Guidelines Section 15150[d]). The State Clearinghouse Number for the County of Imperial General Plan EIR is SCH #93011023.
  - The material to be incorporated in this document will include general background information (CEQA Guidelines Section 15150[f]). This has been previously discussed in this document.



---

## II. *Environmental Checklist*

---

1. **Project Title:** Conditional Use Permit #21-0009 for AT&T California d.b.a. Pacific Bell/  
Initial Study #21-0012
2. **Lead Agency:** Imperial County Planning & Development Services Department
3. **Contact person and phone number:** Jeanine Ramos, Planner I, (442) 265-1736, ext. 1750
4. **Address:** 801 Main Street, El Centro CA, 92243
5. **E-mail:** [jeanineramos@co.imperial.ca.us](mailto:jeanineramos@co.imperial.ca.us)
6. **Project location:** The project site is located at 313 E. Main Street, Niland, CA within the townsite of Niland, approximately 7.5 miles north of the Calipatria Municipal Airport. The parcel is identified as Assessor's Parcel Number (APN) 021-073-007-000 and is legally described as the west 50 ft. of Lots 16, 17, and 18, of Block 35, Townsite of Niland.
7. **Project sponsor's name and address:** BJG Architecture & Engineering, 675 W. Moana Lane, Suite 107, Reno, NV 89509
8. **General Plan designation:** Niland Urban Area Plan (Light Industry)
9. **Zoning:** M-1 (Light Industrial)
10. **Description of project:** The applicant, AT&T CA d.b.a. Pacific Bell., intends to build and operate a 40-foot tall monopole and dish antenna at the rear of the parcel. The purpose of the monopole is to establish a microwave link between the existing AT&T Niland Facility and the new Desert Warfare Training Facility. The training facility is currently under construction at the Chocolate Mountain Air Gunnery Range. The proposed project will also include a foundation slab, waveguide ladder and support posts, and cable entry through existing pipe penetration at the south side of the existing AT&T building. The entire parcel is approximately 7,750 square feet; however, the approximate area of work will be 500 square feet within the rear yard of the parcel. The project site is fully enclosed with an existing chain link fence.
11. **Surrounding land uses and setting:** The project abuts a nonconforming single-family residence to the east that is zoned M-1 (Light Industrial Zone). A vacant lot is directly to the west of the project site that is also zoned M-1 (Light Industrial Zone). The project site abuts Main Street and across this street to the north is an existing RV park, currently zoned R-4 (Mobile Home Park or Subdivision Zone/High Density Residential Zone). Directly to the south is another nonconforming single-family residence that is zoned M-1 (Light Industrial Zone). The project site is occupied by AT&T and currently provides local telephone and Ethernet services to Niland.
12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.): Planning Commission
13. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**  
Native American Heritage Commission (NAHC), Quechan Indian Tribe and Torres-Martinez Indian Tribe were contacted and invited to participate in the Request for Review and Comments as part of the Initial Study review process. An AB52 letter was also sent out to the Quechan Indian Tribe for a 30-day consultation period for review and comment. On April 8, 2021, the Quechan Historic Preservation Office emailed to state they had no comments. No other comments were received.

**FEC ORIGINAL PKG**

---

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

**FEC ORIGINAL PKG**

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION**

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

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

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

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

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

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

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

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

  
 \_\_\_\_\_  
 Jim Minnick, Director of Planning/EEC Chairman

9-9-2021  
 \_\_\_\_\_  
 Date:

**EEC ORIGINAL PKG**

---

## PROJECT SUMMARY

---

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

FEC ORIGINAL PKG

# Exhibit "A" Vicinity Map



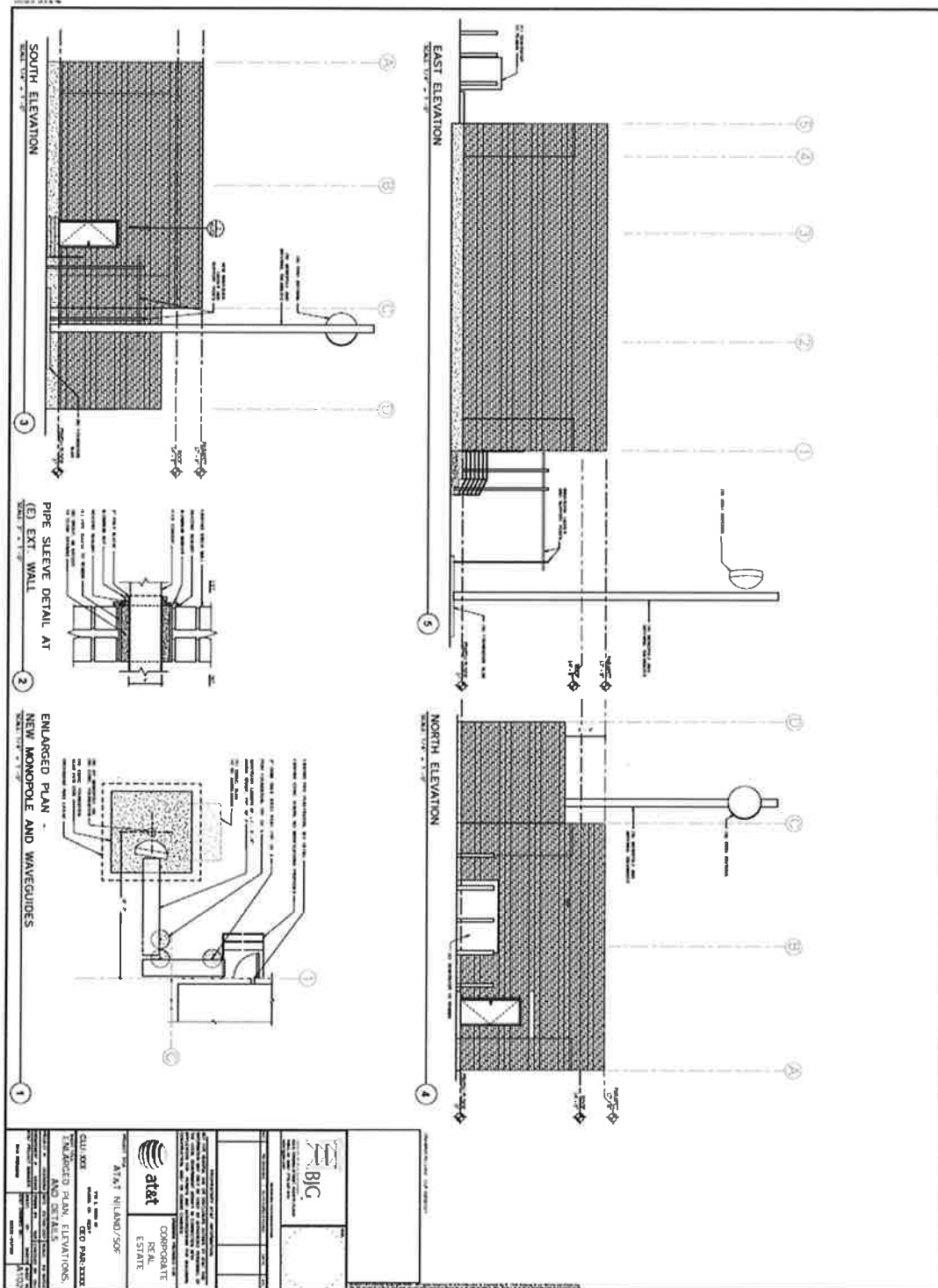
**AT&T CALIFORNIA D.B.A. PACIFIC  
TELEPHONE & TELEGRAPH CO.  
APN 021-073-007-000**

-  PROJECT LOCATION
-  TOWER LOCATION



**FEC ORIGINAL PKG**

# Exhibit "B" Site Plan



FEC ORIGINAL PKG

---

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

I. **AESTHETICS**

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

- a) Have a substantial adverse effect on a scenic vista or scenic highway?      
**a) The project is approximately one-half mile to the east of Highway 111, which is designated a scenic highway according to Imperial County General Plan's Circulation & Scenic Highways Element. However, the only area on Highway 111 that is eligible for future Scenic Highway Designation is from Bombay Beach to the northern County line. This project is not located on or near the designated area. Therefore, less than significant impacts are expected.**
  
- b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?      
**b) There are no scenic resources such as trees, rock outcroppings or historic buildings surrounding the project site; therefore, no impacts are expected.**
  
- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surrounding? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?      
**c) The proposed project is in an urbanized area and consists of building a 40-foot tall monopole with a dish antenna. While the proposed monopole will be visible to public, it will be situated on an existing light industrial site zoned M-1. The proposed project is located within an existing urban area and will not conflict with applicable zoning and other regulations governing scenic quality; therefore, less than significant impacts are expected.**
  
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?      
**d) Title 9, Division 24, requires all towers to be lit with approved lighting as required per the Federal Aviation Administration (FAA) and the Imperial County Airport Land Use Commission standards<sup>1</sup>, this includes day and nighttime lighting, which the US Fish and Wildlife Services states that, "security lighting on on-ground facilities, equipment, and infrastructures should be motion or heat sensitive, down-shielded and of a minimum intensity to reduce nighttime bird attraction."<sup>2</sup> Additionally, all sources of lighting that may be used, including security and operational lighting, are required by State Codes and County Ordinances to be shielded or directed onsite to minimize offsite impacts. Compliance with said codes and ordinances would bring the project's impacts to less than significant levels.**

II. **AGRICULTURE AND FOREST RESOURCES**

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

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?      
**a) According to the California Department of Conservation Farmland Mapping and Monitoring Program (2016)<sup>3</sup>, the project site's Farmland Type is designated Urban and Built-Up Land. As it is not shown on the map as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), no impacts are expected.**

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

**FEC ORIGINAL PKG**



	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? <b>b) The existing zoning and land use designation of the property are related to light industrial uses, which do not conflict with any zoning for agricultural use. In addition, the project site is not under the Williamson Act contract; therefore no impacts are expected.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? <b>c) The proposed project is located within an existing built-up area and will not conflict with existing zoning or cause rezoning of forest land, timberland or timberland zoned Timberland Production. Therefore, no impacts are expected.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? <b>d) As previously stated, the proposed project is located within an existing built-up area and will not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impacts would occur.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? <b>e) The implementation of the project would not result in changes to the environment, which could result in the conversion of farmland to non-agricultural use, since the project is not a part of a site designated as Farmland. Therefore, this would not cause an impact or conversion from forestland to non-forest use and no impacts are expected to occur.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### iii. AIR QUALITY

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

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

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

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

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

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| <p>a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p> <p><b>a) The proposed project site is not located within a designated sensitive habitat according to The Imperial County General Plan's Conservation and Open Space Element<sup>4</sup> Figure 1 "Sensitive Habitats Map". The project is also not within an agency-designated habitat area, but is within the "Flat-Tailed Horned Lizard Species Distribution Model" according to the Imperial County General Plan's Conservation and Open Space Element, Figure 2<sup>5</sup>. However, the project site is currently disturbed, developed with the AT&amp;T Niland Facility providing local telephone and Ethernet services; therefore, less than significant impacts are expected.</b></p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p> <p><b>b) According to the Imperial County General Plan's Conservation and Open Space Element, the project site is not located within or near a sensitive or riparian habitat, nor within a sensitive natural community. Less than significant impacts are expected to occur regarding adverse effects on the above habitats.</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p> <p><b>c) The proposed location of the project is within an urban area that is currently in use by AT&amp;T and the only occasion that water would be required would be during construction. No marsh, vernal pool or coastal wetlands are in the area, so no impacts can be expected.</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| <p>d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p> <p><b>d) The project site is not located on or near a large body of water and no fish or wildlife species would be affected by the proposed project. In addition, it would not impede the use of native wildlife nursery sites since there are none immediately surrounding the project site; therefore, less than significant impacts are expected.</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance?</p> <p><b>e) Compliance with all of the County's regulations and requirements regarding local policies and/or ordinances protecting biological resources would cause the project's impacts to be less than significant, although there are no tree preservation policies applicable to the project site area.</b></p>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| <p>f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?</p> <p><b>f) Imperial County does not have a Habitat Conservation Plan (HCP). Thus, with regards to the HCP, no impacts would</b></p>   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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

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

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

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

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

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

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

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

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

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving:   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>a) The proposed project does not appear to directly or indirectly cause potential adverse effects, including risk of loss, injury, or death. The project shall comply with the most current California Uniform Building Code and regulations provided by the Imperial County Public Works Department. Adherence with the previously referenced Building Codes, the submittal of a soils report as required by the Building Division within Imperial County Planning Department, and/or any other applicable requirement, would reduce impacts to less than significant.</b> |                          |                          |                                     |                          |
| 1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <b>1) The proposed project is not located near any known earthquake fault according to the Fault Activity Map of</b>   |                          |                          |                                     |                          |

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

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

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

- |  |                          |                          |                                     |                                     |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 2) Strong Seismic ground shaking?<br><b>2) Ground shaking is expected to occur being that the project site is located in the seismically active Imperial Valley, with numerous mapped faults of the San Andreas Fault System traversing the region. The proposed project is not located near a known fault, however, all grading and construction work shall require earthquake resistant construction and would need to comply with the latest edition of the California Building Codes, as well as with all current building codes; therefore, less than significant impacts are anticipated.</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 3) Seismic-related ground failure, including liquefaction and seiche/tsunami?<br><b>3) The proposed project is not located in a tsunami inundation area per the California Tsunami Inundation Map<sup>8</sup>, additionally; the design and subsequent construction of the proposed communication tower will be subject to the latest California Building Codes. Therefore, adherence to these regulations would bring any seismic-related impacts such as ground failure to less than significant.</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 4) Landslides?<br><b>4) According to the Imperial County General Plan Landslide Activity Map, Figure 2<sup>9</sup>, Seismic and Public Safety Element, the project site does not lie within a landslide activity area and therefore, no impacts are anticipated.</b>   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| b) Result in substantial soil erosion or the loss of topsoil?<br><b>b) The project site has a very low potential for soil erosion due to its flat topography. The ground would be disturbed for grading and construction purposes but would not affect or cause for soil erosion after construction is completed, since the monopole would be unmanned. The project is subject to approval from both the County's Building (ICPDS) and Public Works Departments. The design of the tower and ancillary equipment, as well as its construction and future operation must be made so that any possibility of contamination of soil or topsoil is minimized or eliminated. Getting the approval for the design and construction of the proposed tower from all applicable County agencies would bring the project's impacts to less than significant levels regarding soil.</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse?<br><b>c) The project site is not known to be located on unstable geological units and/or soil, and the conditions for lateral spreading, subsidence, liquefaction and collapse are not present; therefore, less than significant impacts are expected.</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property?<br><b>d) The proposed project does not appear to be located on expansive soil as defined in the latest Uniform Building Code, creating substantial risk to life or property. Less than significant impacts are anticipated.</b>   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?<br><b>e) No septic tanks or other alternative wastewater disposal systems are being proposed as part of the application. Less than significant impacts are expected.</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?<br><b>f) The proposed project does not appear to directly or indirectly destroy any unique paleontological resources as the site is an existing built up area. Less than significant impacts are anticipated.</b>  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |

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

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

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

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

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

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

**a) Other than during the construction phase, the proposed project is not expected to generate greenhouse gas emissions that would have a significant impact. Impacts are expected to be less than significant.**

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

**b) The proposed project is not expected to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Any grading and construction activities are subject to the Imperial County Air Pollution Control District's recommendations for the reduction of pollutant emissions. Compliance with APCD and all applicable County's requirements would bring the impacts to less than significant levels.**

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

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

**a) The proposed project does not include any handling of hazardous materials; therefore, less than significant impacts to the public or the environment are anticipated.**

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

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

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

**c) Directly east and south of the project site are nonconforming single family residences, while north of the site is an existing RV Park. However, other than during the construction phase of the project, no hazardous emissions or materials are expected to be generated that would affect these residents and park. Therefore, less than significant impacts are expected.**

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

**d) Government Code Section 65962.5 requires the Department of Toxic Substances Control (DTSC) the DTSC EnviroStor Database<sup>10</sup> to compile and update a list of hazardous waste and substances sites. After review, it was found that the project site was not located under a listed hazardous and substances site; therefore, less than significant impacts are anticipated.**

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

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

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

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

**Use Compatibility Plan (Figure 1A)<sup>11</sup>. Less than significant impacts are anticipated.**

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

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

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

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

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

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

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

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

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

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

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

**According to the Imperial County General Plan Erosion Activity Map, Figure 3<sup>12</sup>, Seismic and Public Safety Element, the area is designated low activity. Therefore, less than significant impacts are anticipated.**

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

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

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

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

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

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

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

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

(iv) impede or redirect flood flows?

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

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

**d) According to the California Emergency Management Agency and the Department of Conservation<sup>13</sup>, the project site is not located within a Tsunami Inundation Area for Emergency Planning; therefore, no impacts are expected.**

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

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

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

a) Physically divide an established community?

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

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

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

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

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

**a) In accordance with the California Department of Conservation- Mineral Land Classification Map<sup>14</sup>, the project site is not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region of the residents of the State of California. Less than significant impacts are anticipated.**

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

**b) In accordance with the Imperial County General Plan- Conservation and Open Space Element- Figure 8- Existing Mineral Resources<sup>15</sup>, the project site is not located within an area known to be underlain by regionally important mineral resources or within an area that has the potential to be underlain by regionally mineral resources. Accordingly, implementation of the proposed project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on the local general plan, specific plan or other land use plans. Less than significant impacts are anticipated.**

<sup>13</sup> Department of Conservation Tsunami Inundation Maps [https://maps.conservation.ca.gov/cgs/informationwarehouse/ts\\_evacuation/](https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/)

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

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

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

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

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?<br><b>a) Noise levels produced during the construction phase of the project would be temporary and within business hours, these levels shall not exceed the threshold established in the Imperial County General Plan "Noise Element" and shall comply with the applicable regulations regarding construction. Adherence to the "Noise Element" standards would bring the impacts to a less than significant level.</b>             | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| b) Generation of excessive groundborne vibration or groundborne noise levels?<br><b>b) As previously stated, the temporary noise levels and vibrations that could result from the earthwork and construction activities would have to be maintained within the County's allowed threshold to avoid nuisances regarding excessive groundborne vibration. Adherence to the "Noise Element" standards would bring the impacts to less than significant levels.</b>   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?<br><b>c) The project site is not located within a runway protected zone or approach/departure zone of a local airport. The Calipatria Municipal Airport is approximately seven and a half miles south from the site as shown in the Airport Land Use Compatibility Plan (Figure 1A)<sup>16</sup>, but is not within its sphere of influence. No impacts are anticipated.</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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

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

XV. **PUBLIC SERVICES**

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:<br><b>a) The proposed project will not result in any adverse physical impacts associated with any new or altered governmental facilities or require the need for new or altered governmental facilities. Therefore, less than significant impacts anticipated.</b> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 1) Fire Protection?  | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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



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

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

2) Police Protection?

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

3) Schools?

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

4) Parks?

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

5) Other Public Facilities?

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

**XVI. RECREATION**

a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

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

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

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

**XVII. TRANSPORTATION** *Would the project:*

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

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

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

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

**EFC ORIGINAL PKG**

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

due to the project compared to existing conditions would not be relevant in this case and therefore, less than significant impacts are expected.

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

**c) The proposed project does not have any design features that would increase hazards or incompatible uses. Therefore, less than significant impacts are anticipated.**

- d) Result in inadequate emergency access?

**d) The proposed project will not result in inadequate emergency access; therefore, less than significant impacts are expected.**

XVIII. **TRIBAL CULTURAL RESOURCES**

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

**a) Assembly Bill 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. Assembly Bill 52 requires a lead agency to begin consultation with California Native American tribe that is traditionally and culturally affiliated with geographic area of the proposed project. Imperial County has consulted with appropriate tribes with the potential for interest in the region. Based on comment provided by the Quechan Historic Preservation Office on April 8, 2021, the project site is not located in an area identified as having the potential for a tribal cultural resource; therefore, less than significant impacts are expected.**

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

**(i) The proposed site was not listed under the California Historical Resources in County of Imperial<sup>17</sup> nor does it appear to be eligible under Public Resources Code Section 21074 or 5020.1 (k); therefore, less than significant impacts are expected.**

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

**(ii) There appears to be no history or association in the past with any evidence of historical resources for the property to be either identified as of significance or as candidate for listing in the California Register; therefore, less than significant impacts are expected.**

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

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

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

XX. **WILDFIRE**

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? <b>a) The proposed project will not substantially impair any adopted emergency response plan or emergency evacuation plan. A less than significant impact is expected.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? <b>b) The proposed project is in a flat topographical area and not within a wildfire area. Therefore, less than significant impacts are expected.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? <b>c) The project is not located within a fire severity zone and will not require infrastructure that may exacerbate fire risk. Therefore, no impacts are anticipated.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EEC ORIGINAL PKG

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

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

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

**SECTION 3**  
**III. MANDATORY FINDINGS OF SIGNIFICANCE**

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

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

#### **IV. PERSONS AND ORGANIZATIONS CONSULTED**

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

##### **A. COUNTY OF IMPERIAL**

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Project Planner
- Jeanine Ramos, Project Planner
- Imperial County Air Pollution Control District
- Ag Commissioner

##### **B. OTHER AGENCIES/ORGANIZATIONS**

- Quechan Indian Tribe, Historic Preservation
- IID

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

**FEC ORIGINAL PKG**

## V. REFERENCES

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

**VI. NEGATIVE DECLARATION – County of Imperial**

---

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

---

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

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

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

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

**FEC ORIGINAL PKG**



**VII. FINDINGS**

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



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



The Initial Study identifies potentially significant effects but:

- (1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.
- (2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.
- (3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A NEGATIVE DECLARATION will be prepared.

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

**NOTICE**

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

9-9-2021



Date of Determination

Jim Minnick, Director of Planning & Development Services

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

  
Applicant Signature

9/17/2021  
Date

## SECTION 4

### VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

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

EEC ORIGINAL PKG

# CONDITIONAL USE PERMIT

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

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

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

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

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

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

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

Print Name DRW Date

Signature

Print Name

Date

Signature

### REQUIRED SUPPORT DOCUMENTS

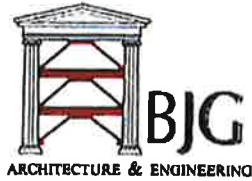
A. SITE PLAN	_____
B. FEE	_____
C. OTHER	_____
D. OTHER	_____

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

**CUP #**  
21-0009

03/17/21 mail 8

EEC ORIGINAL PKG



March 10, 2021

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

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

Dear ICPDS:

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

The documents included are:

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

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

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

Sincerely,

**BJG** ARCHITECTURE & ENGINEERING

Clifford H. Johnson, SE

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

**RECEIVED**

**MAR 17 2021**

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES



February 19, 2021

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

Sent via: US mail

RECEIVED

FEB 22 2021

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

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

Dear Imperial County Planning & Development Services Department,

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

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

**Comments:**

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

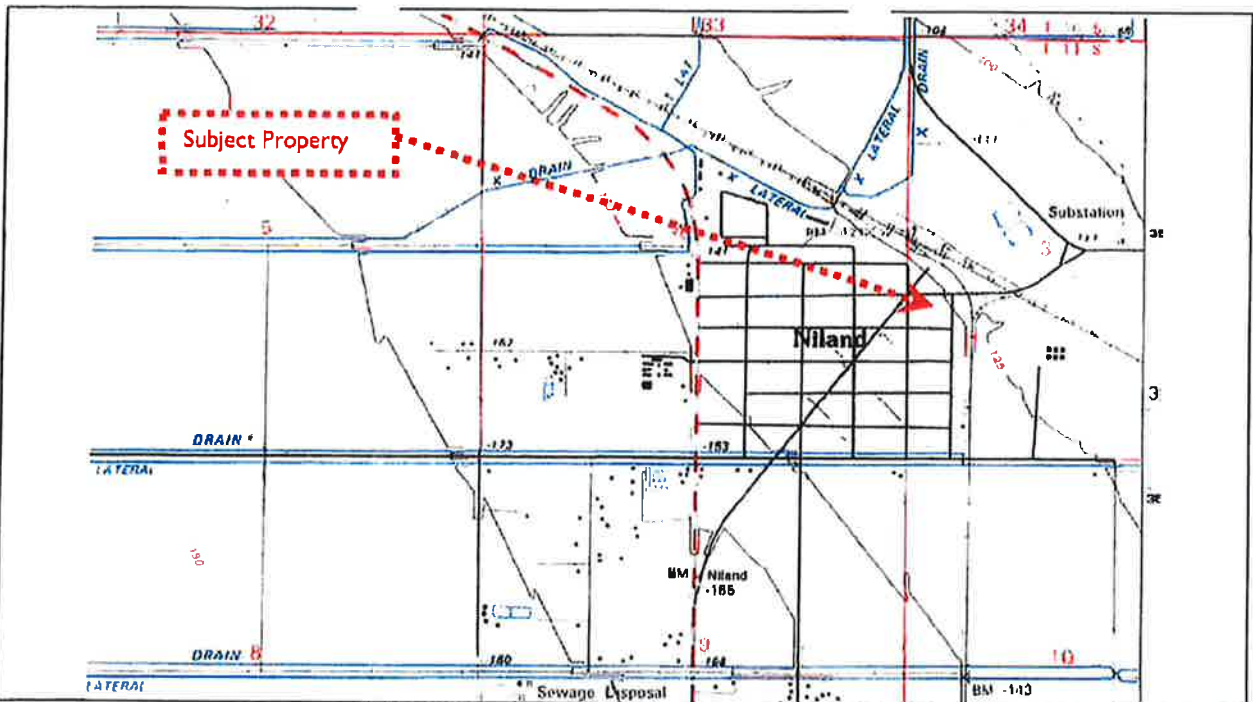
Sincerely,

Mr. Stephen T. Geist, President  
GE²G

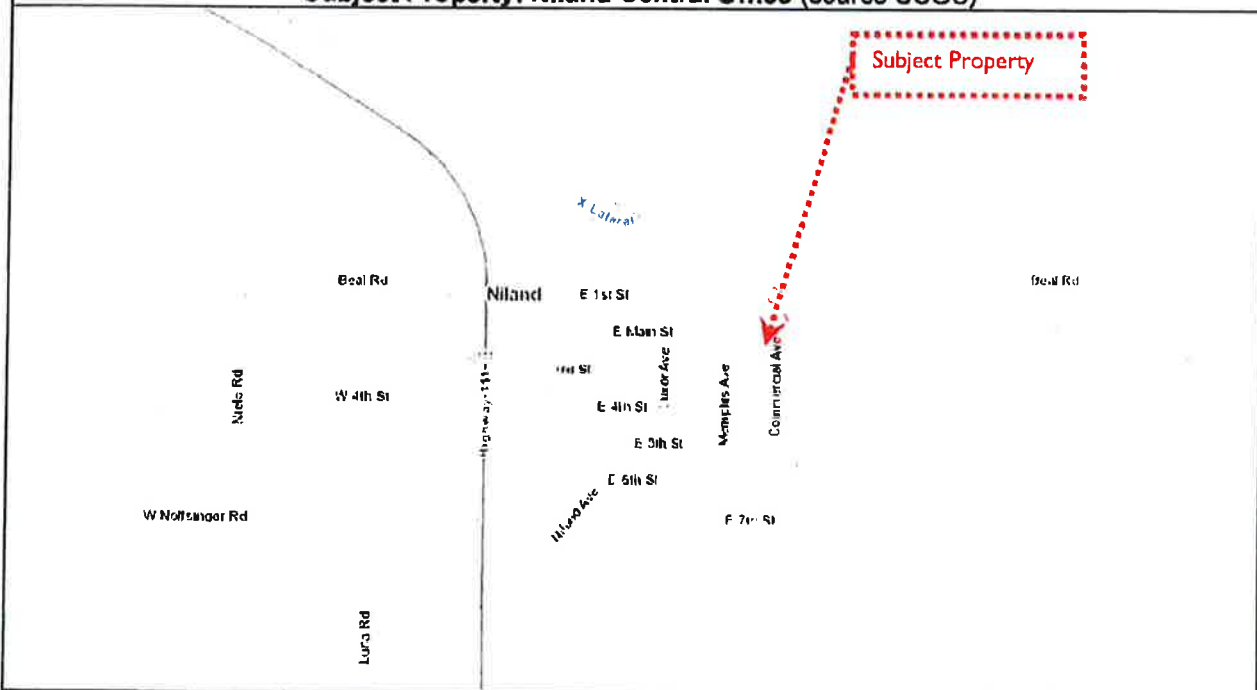
Topographic Map, Street Map, Aerial Map, Building picture and Drawings

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

EEC ORIGINAL PKG



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



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

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

**EEC ORIGINAL PKG**



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

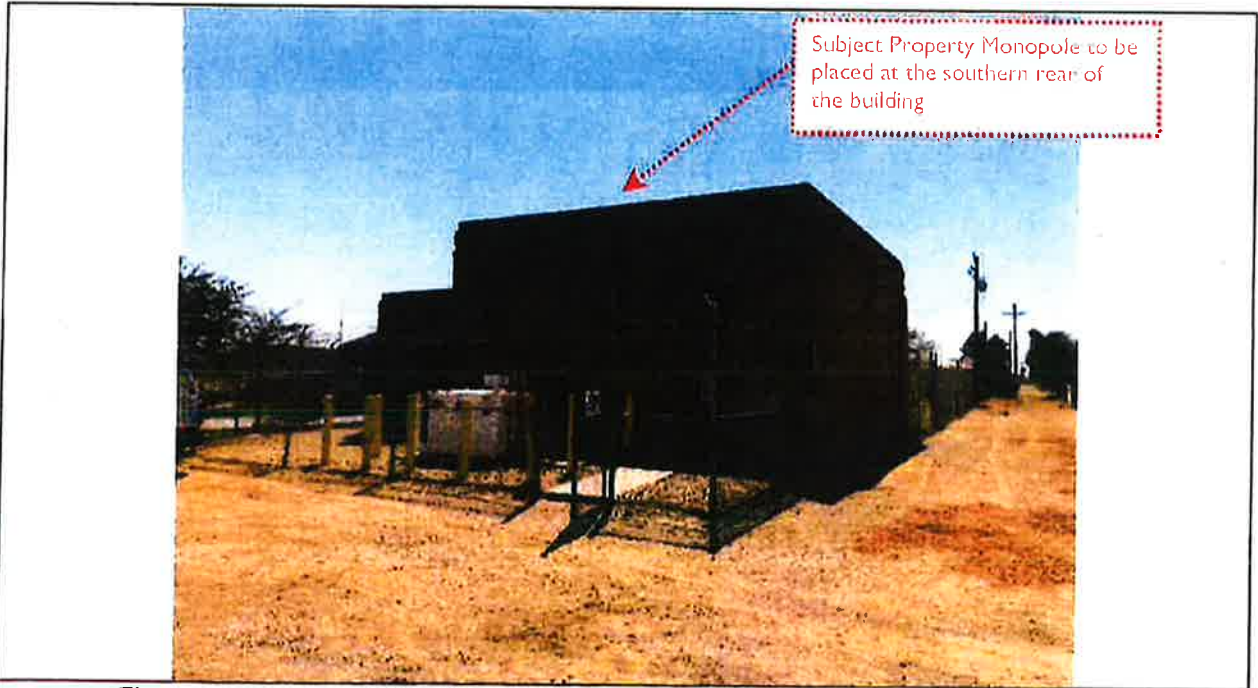


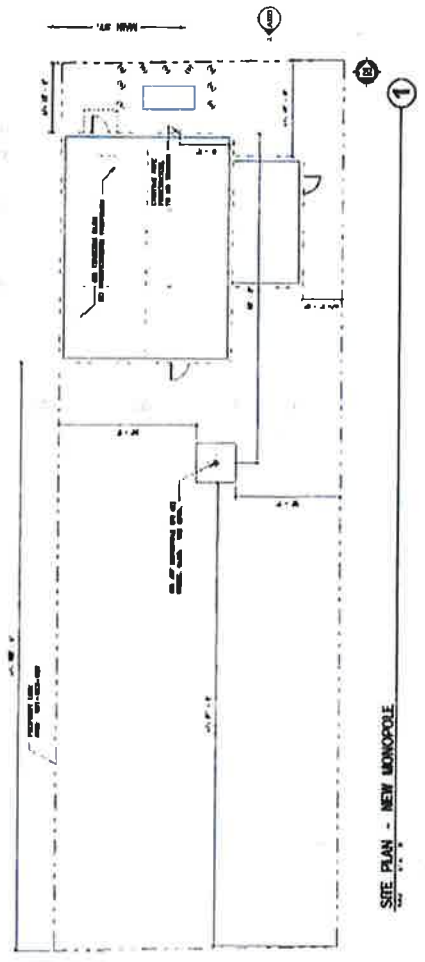
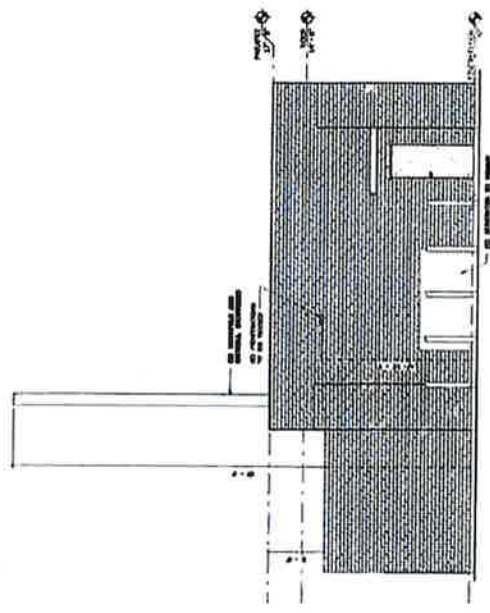
Figure 4: Picture of Subject Property Host Front North Elevation of the Building: Niland Central Office (Source GE<sup>2</sup>G)

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

EEC ORIGINAL PKG



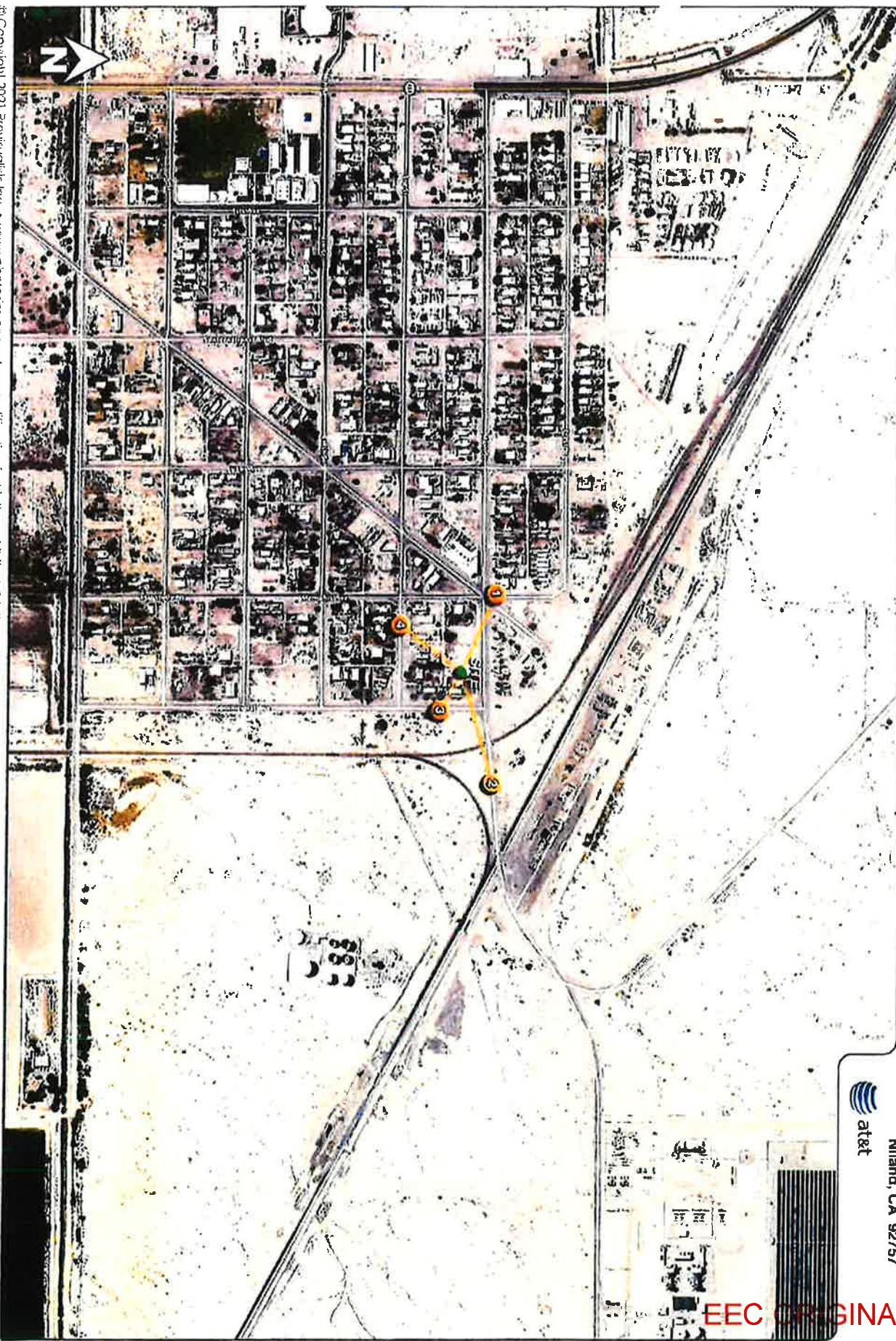
<p><b>BIG</b> BIG INCORPORATED 10000 W. CENTRAL EXPRESSWAY SUITE 100 DENVER, CO 80231 TEL: 303.733.1100 WWW.BIGINCORPORATED.COM</p>	<p>NOT FOR CONSTRUCTION</p>
	<p>AT&amp;T INLAND/SOF</p>
<p>at&amp;t CORPORATE REAL ESTATE</p>	<p>PROJECT: AT&amp;T INLAND/SOF OWNER: AT&amp;T INLAND/SOF ARCHITECT: BIG INCORPORATED DATE: 08/11/09 SCALE: AS SHOWN SHEET NO. 1A101</p>
<p>CLIENT: CSD PARSONS</p>	<p>SITE PLAN AND ELEVATIONS</p>







Aerial photograph showing the viewpoints for the photosimulations.



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

EEC ORIGINAL PKG

1

Existing

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



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



*Proposed microwave dish*

Proposed





Existing

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



Proposed

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



3

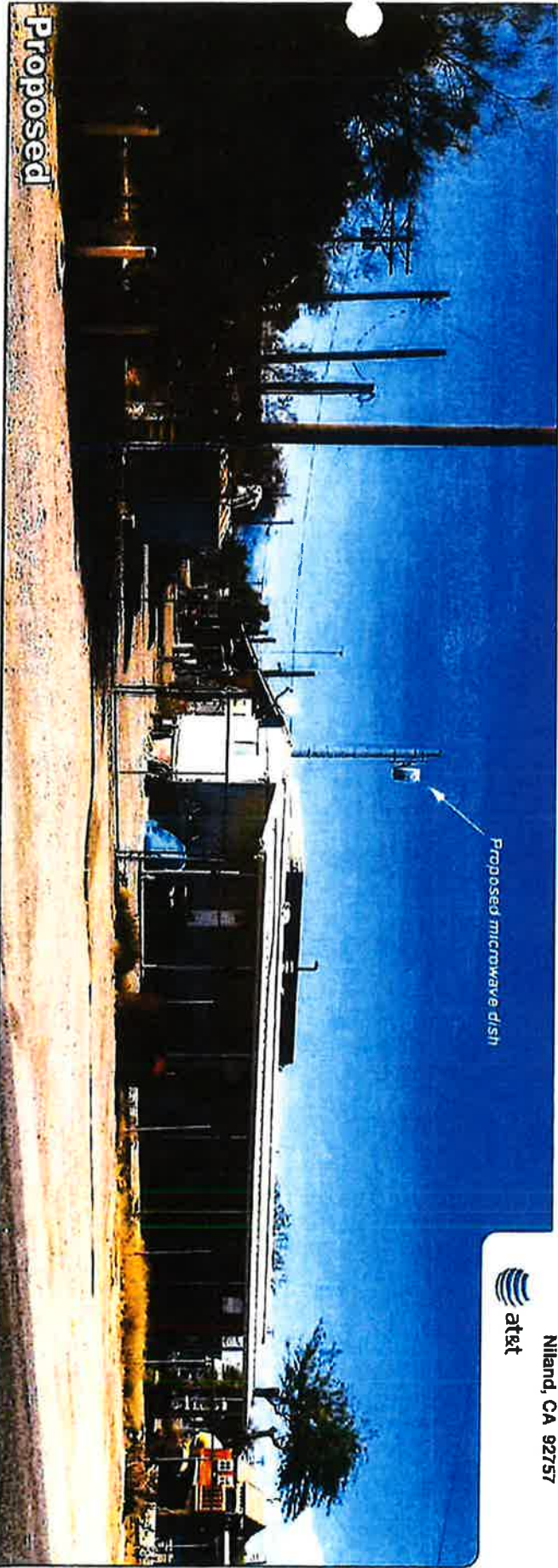
Existing

Photosimulation of the view looking northwest from Commercial Ave.



Proposed microwave dish

Proposed



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

REC ORIGINAL PKG

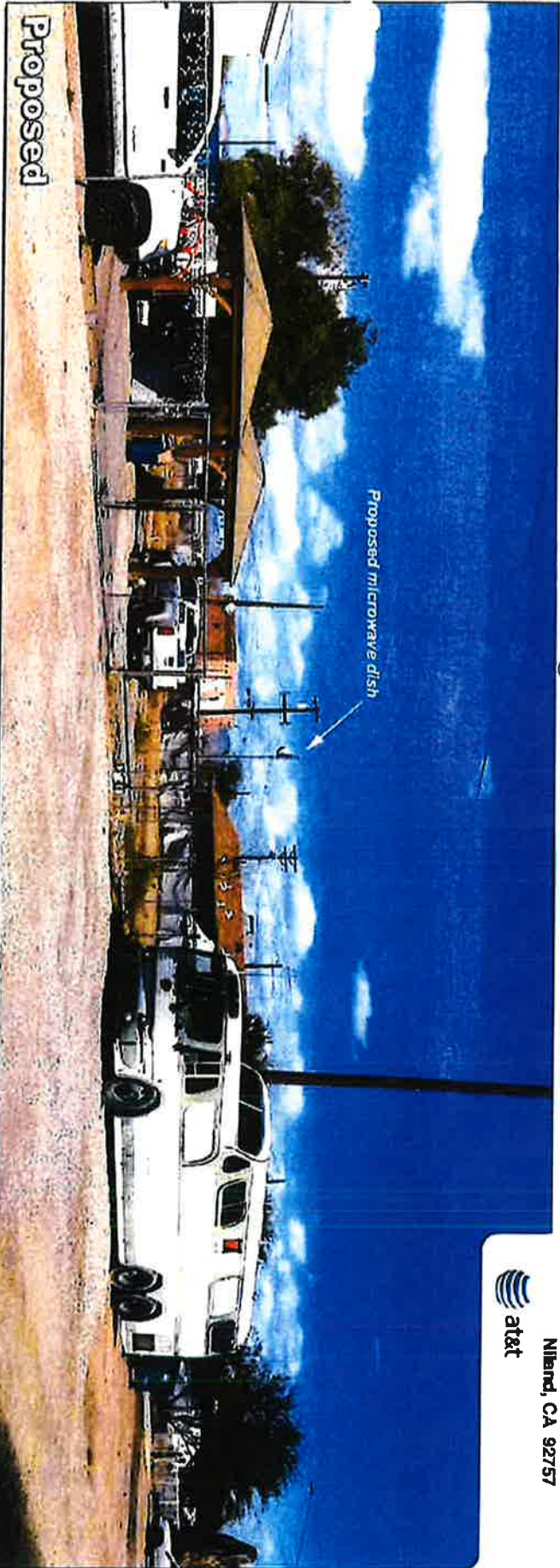
Existing

Photosimulation of the view looking northeast from 3rd Street.



Proposed microwave dish

Proposed



at&t

**AT&T Niland / SOF**

315 E Main St  
Niland, CA 92257

REC ORIGINAL PKC



# **Attachment A: Comments**

EEC ORIGINAL PKG

## Jeanine Ramos

---

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

Hi Jeanine,

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

Please forward a title report once received.

I hope this helps. Thank you.

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

---

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

Good afternoon guys,

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

Thanks,

***Guillermo Mendoza***  
*Right of Way Technician*

**EEC ORIGINAL PKG**



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

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

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

For your review:

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

Thanks,

**Guillermo Mendoza**  
*Right of Way Technician*



**Imperial County**  
**Department of Public Works**  
155 S. 11<sup>th</sup> Street



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



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

RE: Comments on Project ID CUP #21-0009

Dear Ms. Ramos:

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

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

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

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

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

Sincerely,

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

**RECEIVED**

**APR 22 2021**

IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

**EEC ORIGINAL PKG**



# IID

*A century of service.*

www.iid.com

April 21, 2021

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

**RECEIVED** *since 1911*

**APR 21 2021**  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

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

Dear Ms. Ramos:

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

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

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

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

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

Respectfully,



Dohald Vargas  
Compliance Administrator II

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

## Kimberly Noriega

---

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

Good afternoon Ms. Ramos,

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

Best regards,  
Margo



Margo E. Sanchez  
Deputy Agricultural Commissioner/Sealer  
Imperial County  
[agcom.imperialcounty.org](http://agcom.imperialcounty.org)  
442.265.1500

RECEIVED  
APR 20 2021  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

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

Good afternoon,

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

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

## Jeanine Ramos

---

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

Good morning Ms. Noriega,

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

Thank you,

### Mario Salinas, MBA

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



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

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

EEC ORIGINAL PKG



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

**Subject:** CUP21-0009 Request for Comments

Good afternoon,

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

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

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

Thank you,

*Kimberly Noriega*

**Office Assistant III**

**Imperial County**

**Planning and Development Services**

801 Main St.

El Centro, CA 92243

**Phone:** (442) 265-1736

**Fax:** (442) 265-1735



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

**Kimberly Noriega**

---

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

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

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

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

Good afternoon,

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

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

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

Thank you,

*Kimberly Noriega*

Office Assistant III

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

RECEIVED  
APR 12 2021  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

**AIR POLLUTION CONTROL DISTRICT**



RECEIVED  
APR 12 2021  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

April 12, 2021

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

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

Dear Mr. Minnick:

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

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

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

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

## Kimberly Noriega

---

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

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

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

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

Good morning,

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

Kind Regards,

*Kimberly Noriega*

Office Assistant III

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



RECEIVED

APR 08 2021

IMPERIAL COUNTY

PLANNING & DEVELOPMENT SERVICES

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

**Kimberly Noriega**

---

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

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

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

Judith Gerlach

Sent from my iPad

**RECEIVED**  
SEP 01 2021  
IMPERIAL COUNTY  
PLANNING & DEVELOPMENT SERVICES

**EEC ORIGINAL PKG**