BOARD AGENDA FACT SHEET

CLERK USE ONLY
BOS ACTION
#_____

Planning & Development Services Dept. — **May 5 , 2026**
Department /Agency — **Requested Board Date**

1. Request:

Board Approval	**XX**	**Information Only/Presentation**	
Other (specify) _____		**Schedule Hearing Time:**	**11:00 a.m.**

2. Requested Action: *Type requested action below*

Continued from January 27th, 2026 - The Imperial County Planning & Development Services Department respectfully requests that the Board of Supervisors conduct a public hearing to consider Appeal #25-0003 of the October 22, 2025, Planning Commission's decision of denial for the Vertical Bridge Tower project:

1. Consider Approval or Denial of Appeal #25-0003; and,
2. Consider Approval or Denial of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001; and,
3. Consider Approval or Denial of Conditional Use Permit #25-0004 for the proposed wireless communication facility; and,
4. Consider Approval or Denial of Variance #25-0001 for the proposed wireless communication facilities to exceed the 60 feet height limitation by 20 feet.

3. Cost $ N/A **Source:** N/A

4. If approval of Contract, reviewed/approved by County Counsel on: NO

By: *N/A* **Action Request:** N/A
Assigned by County Counsel's Office

1. If approval of position allocation change, approved by Human Resources on: N/A
By: N/A

2. **Electronic copy submittal date:** _____ **By: Valerie Grijalva, Office Supervisor II**

_____
Department Head/Agency Representative

INSTRUCTIONS: Back-up must be submitted 15 BUSINESS days prior to requested date. (Please Note a Holiday counts as a Business Day.) Back-up submitted must contain an Original and 2 copies. Copies must be submitted to the County Executive Office double sided and three (3) hole punched. Back-up must be submitted in a PDF format to vanessasalcido@co.imperial.ca.us and gracielaalvarez@co.imperial.ca.us

Reviewed By: _____ **Deputy CEO**

Reviewed By: _____ **Deputy CEO**

CEO/CLERK USE ONLY:

DATE STAMP

BOARD DATE: _____

Action _____ **Filing** _____

Consent _____ **Presentation** _____

Hearing _____ **CEO Approval** _____

Other (specify) _____

_____ _____
CEO ***Date***

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Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

May 5, 2026

TO: Board of Supervisors

FROM: Jim Minnick, Director of Planning & Development Services M/O_____

SUBJECT: APPEAL #25-0003 OF THE OCTOBER 22, 2025, PLANNING COMMISSION'S DECISION FOR THE VERTICAL BRIDGE TOWER PROJECT TO ALLOW FOR THE CONSTRUCTION AND OPERATION OF A WIRELESS COMMUNICATION FACILITY.

Dear Board Members:

REQUESTED ACTION:

The Imperial County Planning & Development Services Department respectfully requests that the Board of Supervisors conduct a public hearing to consider Appeal #25-0003 of the October 22, 2025 Planning Commission's decision of denial for the Vertical Bridge Tower project:

1. Consider Approval or Denial of Appeal #25-0003; and,
2. Consider Approval or Denial of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001; and,
3. Consider Approval or Denial of Conditional Use Permit #25-0004 for the proposed wireless communication facility; and,
4. Consider Approval or Denial of Variance #25-0001 for the proposed wireless communication facilities to exceed the 60 feet height limitation by 20 feet.

PROJECT SUMMARY:

The applicant has submitted a revised project and now proposes to relocate the tower to a more central location within the parcel, approximately 231 feet south of the northern property line and 329 feet north of the southern property line. Additionally, the tower height has been reduced from 130 feet to 80 feet. The revised project also includes a 231-foot-long and 12-foot-wide access connecting to Thiesen Road.

The project site is located at 1734 E. Underwood Road in Holtville, California (92250), and is identified as Assessor's Parcel Number (APN) 045-600-017-000. The site is legally described as Block 65 and the west half of a vacated street adjacent to Township Site Tract 87 (15-15), consisting of approximately 5.51 acres, located in Section 26, Township 15 South, Range 15 East, San Bernardino Base and Meridian (S.B.B.M.) (see Attachment "A," Site Vicinity Map).

The proposed project was initially presented to the Imperial County Planning Commission on October 22, 2025. Following deliberation, a motion to approve the project failed by a vote of 8–1, as it did not achieve the required six affirmative votes for approval by the ten-member Commission.

The applicant, Vertical Bridge (VB BTS III, LLC), proposes the construction and operation of a wireless communications facility (WCF) at the project site. The original proposal consisted of a 120-foot unmanned monopole tower with an additional 10-foot lightning rod, resulting in a total height of 130 feet. The facility was to be located within a 1,600-square-foot leased and fenced area on the northern portion of the subject parcel, which is owned by Jesus Diaz Gonzales.

The telecommunications facility is designed to support T-Mobile's 4G LTE and 5G network by addressing a documented coverage gap in the area. The tower would accommodate T-Mobile equipment, including eleven 8-foot antennas, twelve remote radio units (RRUs), one 2-foot microwave antenna, one GPS antenna, a backup diesel generator, and associated cabling and mounting equipment. The lease area would be enclosed by a 6-foot-high chain-link fence and include ground-mounted equipment such as two radio cabinets, a backup generator, and an ice bridge to protect connecting cables. Access to the site was originally proposed via a 30-foot-long and 12-foot-wide gravel road.

In addition, the facility is designed to allow for future co-location of at least two additional wireless providers, consistent with the co-location policies outlined in Title 9, Division 24. Vertical Bridge has committed to accommodating co-location where feasible, with any required structural modifications to be funded by the co-locating entities.

The project requires approval of Conditional Use Permit (CUP #25-0004) and Variance (V #25-0001) to allow the structure to exceed the 60-foot height limit established for the A-1 (Light Agriculture) zoning district.

On June 18, 2025, the Imperial County Airport Land Use Commission (ALUC) reviewed the project and determined it to be consistent with the 1996 Airport Land Use Compatibility Plan.

On July 24, 2025, the Environmental Evaluation Committee (EEC) determined that Conditional Use Permit (CUP #25-0004) and Variance (V #25-0001) for the construction and operation of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet, for which said variance will allow to exceed the 60-feet height limitation on the A-1 (Light Agriculture) zone by 70 feet, would not result in a significant effect on the environment and recommended a Negative Declaration (ND) to be prepared. The EEC Committee consists of a seven (7) member panel, integrated by the Director of Environmental Health Services, Imperial County Fire Chief, Agricultural Commissioner, Air Pollution Control Officer, Director of the Department of Public Works, Imperial County Sheriff, and the Director of Planning and Development Services.

The project was subsequently presented to the Board of Supervisors on January 27, 2026. At that time, the item was continued to allow the applicant to address concerns raised during the hearing and to return with a revised proposal, which is now being presented to the Board of Supervisors on April 14, 2026, for consideration.

Land Use Analysis:

In accordance with the Imperial County General Plan, the land use designation for the proposed project is identified as Urban and is zoned A-1-U (Light Agriculture with an Urban Overlay), as shown on Zoning Map #4 of the Imperial County Title 9 Land Use Ordinance. Pursuant to Title 9, Division 5, Section 90507.02, Subsection (jj) of the County's Land Use Ordinance, utility and communication facilities is an allowed use within an A-1 zoned parcel, subject to the approval of a Conditional Use Permit (CUP) by the County. Such approval requires compliance with Division 24 (Communication Ordinance), of the Title 9 Land Use Ordinance. Based on these criteria, the

proposed project is consistent with the Imperial County General Plan and all applicable land use regulations.

Although the proposed project aligns with the A-1 (Light Agriculture) zoning designation under an approved Conditional Use Permit (Division 5, Section 90507.02(jj)), and while maintaining compliance with Division 24 (Communication Ordinance) of Title 9 (Land Use Ordinance), its design has been determined to be inconsistent with the maximum height limitation set forth in Division 5, Chapter 7, Section 90507.06 (Height Limit). In response, and pursuant to Division 2 (General Provisions), Chapter 2 (Land Use Permits – Variance), the applicant has submitted Variance #25-0001, requesting to exceed the 60-feet height limitation by 20 feet, for a total of 80 feet including a 4-foot lightning rod.

ATTACHMENTS:

Attachment A	Vicinity Map
Attachment B	Appeal Request
Attachment C	CEQA Resolutions CUP 25-0004
Attachment D	Board Resolutions CUP 25-0004
Attachment E	CUP 25-0004 Conditions of Approval
Attachment F	Variance Resolutions V 25-0001
Attachment G	Original Board Package from January 27th, 2026 including PC & EEC Packages

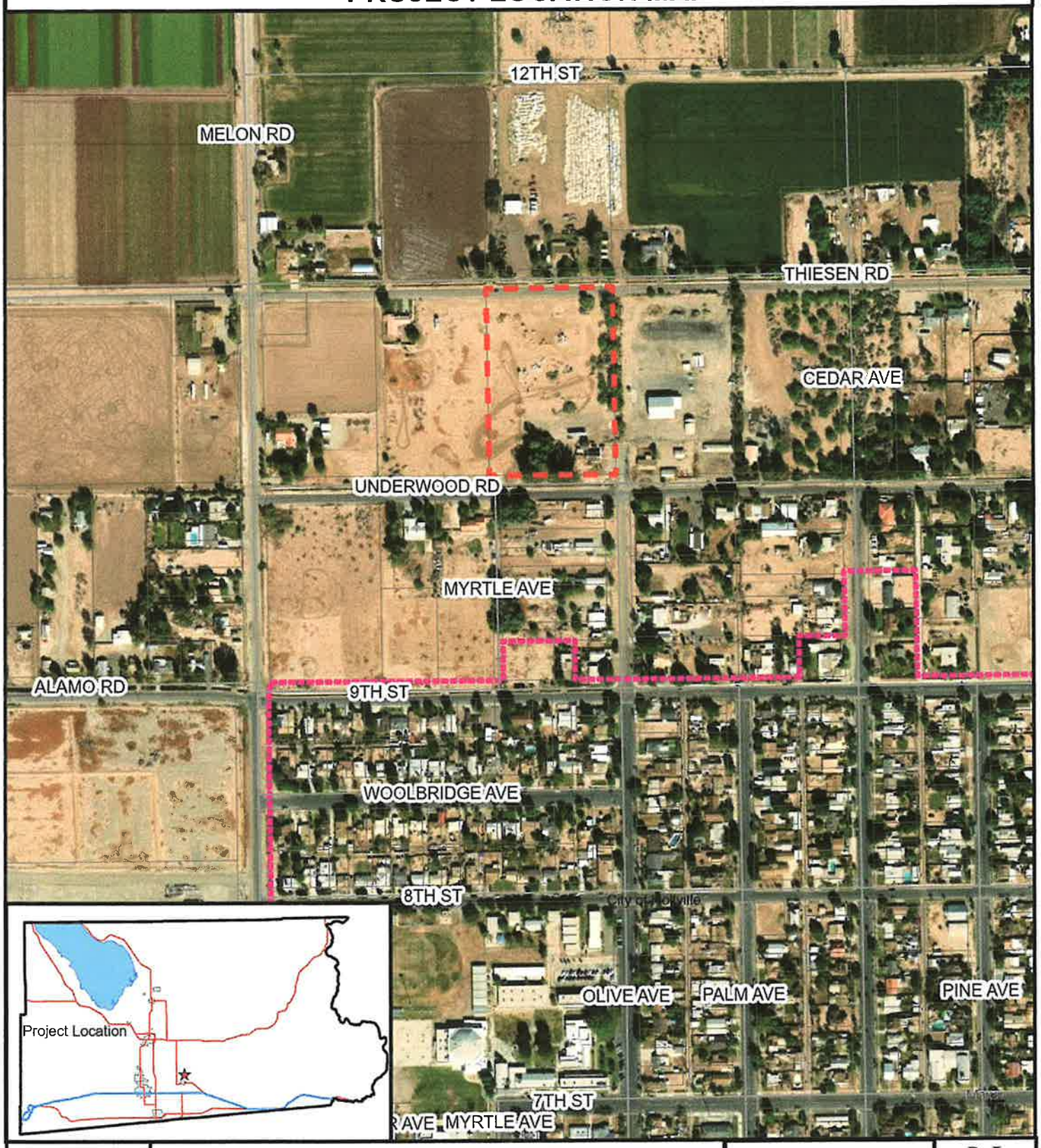
cc: Dr. Kathleen Lang, County Executive Officer
Geoffrey Holbrook, County Counsel
Jim Minnick, Director of ICPDS
Michael Abraham, AICP Assistant Director of ICPDS
Diana Robinson, Planning Division Manager
APP25-0003; APN 045-600-017-000
Files 10.109

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ATTACHMENT "A"

VICINITY MAP

PROJECT LOCATION MAP



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

Project Location
Centerline
City Limit
Parcels

N

ATTACHMENT "B"

APPEAL REQUEST

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VB BTS III, LLC Tower
CA-5363

WCF Conditional Use Permit Application
WCF Variance

Supplemental and Revised Materials

APN: 045-600-017
1734 E Underwood Rd.
Holtville, CA 92250

March 11, 2026

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March 11, 2026

Imperial County Planning Department
801 Main St
El Centro, CA 92243

RE: Supplemental Application Materials | CUP #25-0004, IS # 25-0012, V25-0001

Luis,

On behalf of Vertical Bridge and T-Mobile, we hereby submit additional materials to supplement and strengthen the existing package that Planning has been provided with up to this point. In consideration of the Board od Supervisor's Hearing feedback provided on January 27, 2026 , we have revised documentation and added to our existing application via the attached supplemental items. We greatly appreciate the consideration of our project.

Please see the list of attachments included below.

Attachment 1: Project Narrative *(Revised)*
Attachment 2: Statement of Code Compliance *(Revised)*
Attachment 8: Zoning Drawings *(Revised)*
Attachment 9: Alternative Sites Analysis *(Revised)*
Attachment 13: Photo Simulations *(Revised)*
Attachment 15: T-Mobile Coverage Objective & Engineering Justification *(Revised)*

Attachment 1:
The Project Narrative has been revised to reflect the updated attachment list, show a lowered height of 80' and revised setbacks from residential homes and zones according to the newly proposed coordinates.

Attachment 2:
The Statement of Code Compliance has been revised per design ideas discussed at the 1/27/26 Board of Supervisor's Meeting.

Attachment 8:
The Zoning Drawings have been revised to update the updated total height of the tower (80'), include the beacon light, revise the proposed coordinates, and shorten the lightning rod to 4'.

Attachment 9:
The Alternative Sites Analysis has been revised to include the updated coordinates and to revise Figure F showing approximate setbacks from the residences and R-1 parcel line.

Attachment 13:
The Photo Simulations have been revised to update the location of the tower according to the newly proposed coordinates and to shorten the overall height of the proposed tower.

Attachment 15:
T-Mobile's RF Engineers have revised the Coverage Maps to provide a stronger justification of the tower and its location. The Coverage Objective and Engineering Justification now includes a

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comparison between antenna tip heights of 119', 76' (current proposal) and if the tower were to be proposed at 60' to meet the requirement of the A-1 zone. The proposed 80'tower is designed to provide reliable wireless coverage to the area northeast of Holtville and is intended to provide continuous coverage throughout the City of Holtville. It will extend the T-Mobile Coverage currently provided by the existing tower located south of Holtville and will ensure that there are little to no gaps in coverage.

Please feel free to reach out should there be any questions, we appreciate your consideration.

Kind regards,

Melissa Keith
mkeith@assurance-group.com / 323-807-6571

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Attachment 1

Project Narrative *(Revised)*

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

Submitted to Imperial County, California
Planning & Development Services Department
Updated: March 11, 2026

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

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

Representative:
Assurance Development
1499 Huntington Dr #305
South Pasadena, CA 91030
Contact: Samantha Herrmann
(310) 488-6237
sherrmann@assurance-group.com

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

Project Address:
1734 E Underwood Rd, Unit 2
Holtville, CA 92250

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

Zoning Classification: A-1, Limited Agricultural

General Plan Designation: Urban

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

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

1. PROJECT OVERVIEW

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

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

Attachment 1:	Project Narrative (this document) *(Revised)*
Attachment 2:	Statement of Code Compliance *(Revised)*
Attachment 3:	Conditional Use Permit Application Form
Attachment 4:	Indemnification Form
Attachment 5:	Variance Application Form
Attachment 6:	Authorized Agent Letter of Authorization
Attachment 7:	Owner Letter of Authorization
Attachment 8:	Zoning Drawings *(Revised)*
Attachment 9:	Alternative Sites Analysis (Revised)
Attachment 10:	Assessor's Parcel Map
Attachment 11:	Grant Deed
Attachment 12:	Title Report
Attachment 13:	Photo Simulations *(Revised)*
Attachment 14:	Equipment Specifications
Attachment 15:	T-Mobile Coverage Objective & Engineering Justification *(Revised)*
Attachment 16:	EME Report
Attachment 17:	Co-Location Letter of Intent
Attachment 18:	FAA TOWAIR Report
Attachment 19:	NEPA Report, dated March 14, 2025
Attachment 20:	IVECA Public Benefit Agreement
Attachment 21:	Fall Zone Letter

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

2. PROPOSED PROJECT DETAILS

2.1. Location

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

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

2.1.2. Lease area.

- The proposed 1600 sq. ft. lease area for the WCF is in the northern portion of the parcel, setback approximately 231 ft. from the north, 315 ft. from the east, 329 ft. from the south, and 5 ft. from the west. (the "Lease Area").

- The lease area will be surrounded by a 6 ft. high chain link fence screened with beige, vinyl privacy slats.

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

2.2. Wireless Facilities and Equipment

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

2.2.1. Support structure design. Applicants are proposing to build a new 80 ft tall monopole (the "Tower") on the Property. This will be an unmanned wireless communications facility.

2.2.2. Antennas and accessory equipment.

- The Tower will contain T-Mobile equipment consisting of a 80' Monopole With (11) 8' Antennas, (12) RRU's, (1) 3' Microwave, (1) GPS Antenna, Required Antenna Cabling, and HCS Jumpers.
- The antennas, RRUs, and accessory equipment on the Tower will be non-reflective.
- The tower is to be made of non-reflective galvanized steel that will dull over time.
- Space for two additional future collocators has been made available on the Tower as encouraged under the Code, as shown on Sheet A4 of **Attachment 8, Zoning Drawings.**
- The proposed T-Mobile antenna centerline is 72 ft. See elevations on Sheet A4 of **Attachment 8, Zoning Drawings.**

2.2.3. Ground equipment.

- The ground equipment will consist of (2) Ground Mounted Radio Cabinets, (1) Back-Up Diesel Generator, (1) 10'x15' Ice Canopy, (2) Raised Concrete Pads, Utility Backboard and Multi-Meter Utility Service Mounted On H-Frame.
- An ice bridge is proposed from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas.
- The Tower and all ground equipment will be constructed within the 40' x 40' fenced Lease Area, not including the proposed Imperial Irrigation District transformer.

2.3. Additional Details

2.3.1. Lighting. Per the ALUC's conditions, the Tower will include a light beacon at top of the monopole at a height of 78'-2". There will also be two service lights on site within the enclosed equipment space that will only be utilized during site maintenance visits or in case of an emergency. See **Attachment 8, Zoning Drawings**, sheet A4 for further service lighting details.

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

3. T-MOBILE NETWORK COVERAGE AND SERVICES

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

T-Mobile is upgrading and expanding its wireless communications network to support the latest 4G LTE and 5G technology. 4G and 5G stand for "4th Generation" and "5th Generation" and LTE stands for "Long Term Evolution." These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality – 4G LTE offers speed up to ten times faster than 3G,

and 5G can deliver speeds up to 20 Gbps in ideal conditions. That's nearly 200 times faster than the 4G network.

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

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

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

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

Using these frequencies together can help T-Mobile's 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the proposed Facility will become part of T-Mobile's statewide and nationwide communications network. Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Upon completion, the Facility will become part of T-Mobile's statewide and nationwide communications network. See **Attachment 15, T-Mobile Coverage Objective & Engineering Justification.**

3.2 Coverage Objectives for Proposed Facility

This proposed facility meets T-Mobile's coverage and capacity objectives by providing reliable 5G and 4G wireless coverage within an area northeast of Holtville and the surrounding area, not

adequately served by T-Mobile's network. Specifically, this proposed new wireless facility is intended to improve both voice & data services to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks.

T-Mobile has established a need for service in this geographic area, as determined by market demand, coverage requirements for a specific geographic area, and the need to provide continuous coverage from one site to another in a particular geographic region. The specific coverage objective was determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area. See **Attachment 15, T-Mobile Coverage Objective & Engineering Justification.**

4. SEARCH RING

T-Mobile's RF engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, T-Mobile RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.

The search ring established for this proposal, and a description of the methodology used to identify the search ring, is provided in **Attachment 15, T-Mobile Coverage Objective & Engineering Justification**.

5. SITING ANALYSIS

Pursuant to the Imperial County Code § 92401.06, Applicants evaluated alternative site locations, including collocation opportunities, within the targeted search ring possible locations for the proposed Facility. See **Attachment 9, Alternative Sites Analysis** for a summary of the alternative site locations analyzed.

6. APPLICABLE LAW

6.1. Local Codes

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

6.2. State Law

Wireless telecommunication facilities that require discretionary review also require environmental review under the California Environmental Quality Act (CEQA). A discretionary project is one that requires the exercise of judgement or deliberation by a public agency in determining whether the project will be approved, or if a permit will be issued.

6.3. Federal Law

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

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

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

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

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

[2] Id. at ¶ 35.

[3] Id. at ¶¶ 34-42.

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

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

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

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

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

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

[4] 47 C.F.R. § 1.6002(g).

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Attachment 2

Statement of Code Compliance*(Revised)*

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

Updated: March 11, 2026

Submitted to Imperial County
Planning & Development Services Department

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

Title 9 – Land Use code

I. **Wireless Facilities Requirements**

- Division 24 Communication Facilities – Chapter 1 Communication Facilities

II. **General Requirements**

- **Division 2 General Provisions – Chapter 3 Land Use Permits (Conditional Use Permit)**
- **Division 2 – General Provisions, Chapter 2 Land Use Permits (Variance)**

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

Division 24 COMMUNICATION FACILITIES

Chapter 1 COMMUNICATION FACILITIES

92401.00 Purpose.

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

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

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

C. Minimize the number of towers throughout the community;

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

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

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

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

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

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

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

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

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

92401.01 Definitions.

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

92401.02 Applicability.

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

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

Applicants' Response: Applicants are proposed a new 80' monopole tower, commonly referred to as a wireless communications facility ("WCF") at 1734 E Underwood Rd, Holtville, CA 92250. The facility will include a 4-foot lightning rod at the top of the tower, resulting in an overall structure height of 80 feet. Applicants are requesting the review of Application materials and will comply with the regulations set forth in this division as set forth herein.

The remainder of Section 92401.02 has been omitted, as the remainder of the facility types listed in this section are not applicable to the proposed project.

92401.03 Exemptions.

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

92401.04 General requirements.

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

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

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

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

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

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

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

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

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

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

The tower will provide for space for the future co-location of two additional carriers. Vertical Bridge will also provide tower space at the maximum height of 65' for the Imperial Valley Emergency Communications Authority, as determined by a Public Benefit agreement, please see Attachment 20. Please see Sheet A4 of Attachment 8, Zoning Drawings for the tower elevations and carrier locations.

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

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

one hundred ten (110) feet and if it is five co-locators, then it would be one hundred twenty (120 feet).

Applicants' Response: The proposed tower will be eighty (80) feet in height, with a four (4) foot lightning rod mounted at the top, for a total structure height of eighty (80) feet. The WCF has been designed to accommodate three co-located wireless providers. The Tower has been proposed to be the lowest possible height to meet T-Mobile's technical service objectives. During the CUP Application Process, applicants will be requesting review and approval of a variance for the additional height requested from the base zone height of 60'. T-Mobile's RF engineers have determined that the 76' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives.

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

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

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

Applicants' Response: The tower is proposed to be eighty (80) feet with three co-located carriers.

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

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

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

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

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

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

Applicants' Response: The ground equipment will be secured and screened by the six (6) foot tall chain-link fence, with beige, vinyl privacy slats. Please see Attachment 8, Zoning Drawings, and Attachment 13, Photo Simulations.

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

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

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

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

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

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

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

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

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

Applicants' Response: The proposed WCF is not to be located within one hundred (100) feet of a residential zone or residence. Please see Figure F within Attachment 9, Alternative Sites Analysis for demonstration of setbacks.

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

Applicants' Response: Equipment cabinets will be aboveground and screened by the six (6) foot tall chain link fence. The equipment will not exceed 8', as shown on Sheet A4 of Attachment 8, Zoning Drawings. All equipment will be screened from public view by the 6' tall chain link fence with beige privacy slats. All structures meet the setback and height restrictions of the A-1 Zone.

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

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

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

Applicants' Response: The proposed WCF allows for the co-location of two additional carriers. Vertical Bridge will provide space at a maximum height of 65' for the installation of the Imperial Valley Emergency Communications Authority Equipment, please see Attachment 20, IVECA Public Benefit Agreement. Vertical Bridge has also committed to the shared use of the tower for co-location purposes, as provided in Attachment 17, Co-Location Letter of Intent. Please see Sheet A4 of Attachment 8, Zoning Drawings for elevations and further locational details.

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

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

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

Applicants' Response: Acknowledged. The proposed WCF will constitute a principal use of the lease area, while remaining subordinate to and compatible with the existing primary use of the overall parcel, used as a residence and light agricultural land. "Utility and communication facilities" are permitted in the A-1 Zoning District subject to approval of a Conditional Use Permit (see §90507.02jj).

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

Applicants' Response: The proposed WCF complies with the setback requirements of the underlying A-1 District as demonstrated below. Please also see Attachment 8 – Zoning Drawings, Sheet A1 – Site Plan.

§90507.05 Yards and setbacks

Setback Type	**Code Requirement**	**Proposed WCF Setback**
Front yard (Thiesen Rd)	≥ 25 ft from edge of ROW **or** ≥ 60 ft from road centerline (whichever applies)	60 ft. from road centerline; ≥ 25 ft from edge of ROW
Side yard (west property line)	≥ 5 ft (≥ 15 ft if street side of corner lot)	5 ft.
Side yard (east property line)		350 ft.
Rear Yard (Underwood Rd.)	≥ 5 ft (or equal to front yard if through lot)	Through lot – setback 530 ft from Underwood Rd. (exceeds 60 ft/25 ft requirement)

The proposed WCF meets the minimum side yard setback requirement of the A-1 zone, with a fence setback of approximately five (5) feet from the western property line. County Code further requires consideration of tower height in the event the highly unlikely event of a structural failure. Standard engineering of wireless communication facilities incorporates a break point design to ensure that, in the extremely unlikely event of a structural failure, the tower would collapse within the leased compound and not extend beyond the property boundary.

§90507.04 Minimum lot size.

The subject parcel (APN 045-600-017) is approximately 216,000 square feet (4.96 acres), which substantially exceeds the minimum one-half acre lot size required in the A-1 zone under County Code §90507.04. No subdivision of land is proposed.

§90507.06 Height limit.

§90507.06(3) limits provided that radio and television antennae, chimneys and other similar structures shall not exceed sixty (60) feet. The proposed WCF is 80 ft. tall with a 4 ft lightning rod, resulting in an overall height of 80 ft. Accordingly, Applicants are requesting a Variance to deviate from the base zone height limit. The justification for this request is provided in the Variance criteria discussion set forth in the Statement of Code Compliance below.

§90507.07 Minimum distance between structures.

§90507.07(a) requires there shall be a minimum of ten feet between residential buildings/structures. The nearest residential structure is located approximately 240 ft from the proposed WCF at 1736 E Thiesen Rd. Please refer to Figure F in Attachment 9, Alternative Sites Analysis.

17. Inventory of Existing Sites. Each applicant for a facility shall provide to the planning director an inventory of its existing towers, antennas, or sites approved for facilities, that are either within the jurisdiction of Imperial County or within one mile of the border thereof, including specific information about the location, height and design of each facility. The planning director may share such information with other applicants applying for administrative approvals or special use permits under this division or other organizations seeking to locate facilities within the jurisdiction of Imperial County, provided, however that the planning director is not, by sharing such information, in any way representing or warranting that such sites are available or suitable.

Applicants' Response: On January 9, 2025, Planner Derek Newland provided feedback via email that T-Mobile and the Applicant would need not provide an inventory of its existing towers within the county as a whole. Applicants have provided an inventory of existing T-Mobile towers within three (3) miles of the proposed site, as these are the most relevant and applicable to the coverage objectives of the proposed site.

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

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

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

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

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

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

Applicants' Response: The proposed antennas are to be installed on the tower and are made of a non-reflective plastic.

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

Applicants' Response: Per the ALUC's conditions, the Tower will include a light beacon at top of the monopole at a height of 78'-2". There will also be two service lights on site within the enclosed equipment space that will only be utilized during site maintenance visits or in case of an emergency. See Attachment 8, Zoning Drawings, sheet A4 for further service lighting details.

There will be two service lights on site that will only be utilized only during site maintenance visits or in case of an emergency. Please see Attachment 8, Sheet A3 for further locational detail.

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

Applicants' Response: Acknowledged. Acknowledged. Applicants will ensure that the proposed facility is constructed and operated in full compliance with all applicable federal and state requirements, including current and future standards established by the FAA, FCC, and any other governing agency with jurisdiction over towers and antennas. If such standards are revised, Applicants will bring the facility into compliance with the revised requirements within the timeframe mandated by the applicable agency.

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

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

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

Applicants' Response: Acknowledged. Tower setbacks and separation distances for the proposed WCF have been calculated and designed to comply with the A-1 base zone regulations contained in Title 9 – Division 4 – Chapter 7: A-1 Limited Agriculture, as demonstrated as part of this Statement of Code Compliance.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Under California Public Utilities Code, a franchise is only required for installation or operation of facilities within the public right-of-way. The proposed WCF will be located entirely on private property and therefore does not require a franchise

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

Applicants' Response: Acknowledged.

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

Applicants' Response: No signage is proposed on the WCF other than identification signage and safety signage as required by applicable federal law.

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

Applicants' Response: All buildings, ground equipment, and support equipment associated with the proposed WCF will comply with the requirements of the County Code, including applicable development standards of the A-1 zone as demonstrated herein.

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

Applicants' Response: The proposed project consists of a single monopole and associated ground equipment within one lease area. No additional towers or antenna sites are proposed under this application.

92401.05 Permitting and application requirements.

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

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

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

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

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

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

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

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

a. The facility complies with all applicable Section 92401.04.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(B) Height.

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

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

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

(C) Onsite Location.

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

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

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

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

c. New Towers in Nonresidential Zones. Locating any new tower in a nonresidential zone other than industrial or heavy commercial, provided a licensed professional engineer certifies that the tower can structurally accommodate the number of shared users proposed by the applicant; the planning director concludes the tower is in conformity with the goals set forth in Section 92401.00 and the requirements of Section 92401.04; the tower meets all setback and separation requirements of the base zone; and the tower meets the following height and usage criteria:

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

92401.06 Alternatives analysis—Information required.

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

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

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

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

Applicants' Response: Please see Attachment 9, Alternative Sites Analysis for further detail of the considered locations. Applicants are open to discussions regarding the design of the proposed facility, if Planning may determine a preferred design.

92401.07 Visual analysis.

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

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

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

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

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

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

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

92401.08 Radio-frequency exposure review.

An RF environmental evaluation report shall be prepared for any proposed communication facility meeting the specifications below. In order for a proposed facility that requires an RF environmental evaluation report to be approved, the report must demonstrate that RF emissions from the facility in combination with existing RF emissions from nearby facilities will meet the current FCC adopted exposure standard.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

92401.09 Towers.

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

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

Applicants' Response: Per correspondence with Planner Derek Newland on January 16, 2025, it was confirmed that the adjacent land uses, zoning, and general plan designation, can be shown on the Alternative Sites Analysis. Please see Attachment 9. Correspondence is included at the end of this document. Access and setbacks are provided on Sheet A1 of Attachment 8, Zoning Drawings, and elevations are provided on Sheet 4.

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

Applicants' Response: The legal description of the parent tract and leased parcel are provided on Sheet LS-1 of Attachment 8, Zoning Drawings.

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

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

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

Applicants' Response: Please see Figure C: Existing Towers within Three Miles in Attachment 9, Alternative Sites Analysis.

E. A landscape plan showing specific landscape materials;

Applicants' Response: No landscape plan is proposed.

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

Applicants' Response: The proposed fence is to be a 6' chain link fence screened with beige, vinyl privacy slats.

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

Applicants' Response: Applicants' have provided a detailed response to all applicable standards and requirements in Section 92401.04 General requirements, and all other applicable federal, state or local laws, as provided in this Statement of Code Compliance.

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

Applicants' Response: Please refer to Attachment 17 Co-Location Letter of Intent and Attachment 20 – IVECA Public Benefit Agreement confirming that the proposed tower is designed to accommodate the collocation of additional antennas for future users.

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

Applicants' Response: The backhaul for this tower will be provided over a fiber connection arranged by T-Mobile.

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

Applicants' Response: Applicants conducted thorough research on the surrounding existing towers and towers for the proposed facility. There are three existing towers within a 2-mile radius of the site, and none were found to be feasible for the proposed facility. No other structures were found to be adequate for the height and structural integrity required for the proposed facility. Please see Attachment 9, Alternative Sites Analysis for further demonstration of this research.

92401.10 Modifications to facilities.

To the extent necessary to ensure compliance with adopted FCC regulations regarding human exposure to RF emissions, or upon the recommendation of the planning director, the operator shall modify the placement of the facilities; install fencing, barriers or other appropriate structures or devices to restrict access to the facilities; install signage, including the radio-frequency hazard warning symbol identified in ANSI C95.2-1982 and multilingual warnings if deemed necessary by the planning director to notify persons that the facility could cause exposure to RF emissions; and/or implement any other practice reasonably necessary to ensure that the facility is operated in compliance with adopted FCC RF emission standards.

Applicants' Response: The proposed WCF will be designed, constructed, and operated in full compliance with FCC regulations regarding human exposure to RF emissions. Applicants will implement all required mitigation and other safety measures identified in the EME report, prepared by a qualified RF professional to ensure ongoing compliance with federal standards.

92401.11 Changes to FCC standards.

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

Applicants' Response: Applicants understand and acknowledge that the proposed WCF must comply with all applicable federal safety standards regarding RF emissions and will ensure ongoing compliance with federal standards.

92401.12 Life of approval.

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

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

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

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

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

92401.13 Facilities in existence prior to adoption of these regulations.

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

92401.14 Public benefit.

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

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

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

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

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

Applicants' Response: Vertical Bridge has agreed to enter into a Public Benefit Agreement with the IVECA. Please see Attachment 20, IVECA Public Benefit Agreement.

Chapter 3 LAND USE PERMIT (CONDITIONAL USE PERMIT)

90203.00 Purpose.

The purpose of this chapter is to define and establish guidelines for the processing of a conditional use permit application.

Applicants' Response: Acknowledged.

90203.01 Conditional use permit defined.

A "conditional use permit (CUP)" is a permit issued to a landowner allowing a particular use or activity not allowed as a matter of right within a particular zone. A conditional use permit requires the exercise of judgment and the review of factual issues to determine if the application and resulting limited entitlement will conform to the provisions of this title and is consistent with the general plan. Generally, a conditional use permit consists of a limited entitlement that requires a decision-making body to approve a use subject to conditions or disapprove a particular use, and is in the best interest of public convenience and necessity. A conditional use permit runs with the land for the period of time specified in the permit.

Conditional use permits shall be further classified and defined as follows:

A. Minor Conditional Use Permit (CUP-1). Minor conditional use permits typically allow for the following specific uses.

   1. A second dwelling unit (one additional unit);
   2. A domestic water well (less than 1.5 acre feet/year), upon and for the use by a single parcel, and for domestic use only;
   3. A commercial water well with less than five acre feet of water use per year, and for a single commercial use;
   4. A pre-school with less than twenty (20) children;
   5. A day care facility with less than twenty (20) children (under the age of six years);
   6. A limited care facility for the handicapped or elderly not to exceed five users;
   7. Home occupations;
   8. Facilities for abused men/women/children provided it does not exceed five users;
   9. Temporary real estate, temporary construction and other temporary offices;
   10. Limited term special events for limited use.

B. Intermediate Conditional Use Permit (CUP-2). An intermediate conditional use permit shall be a permit issued for a project whose total developed value is greater than one hundred thousand one dollars ($100,001.00), but less than one million dollars ($1,000,000.00), including land cost.

In addition, the following specific projects shall also be considered as intermediate conditional use permit.

1. Churches or other places dedicated exclusively to religious worship;
2. Educational institutions, including schools (except preschools under subsection A of this section);
3. Hospitals, sanitariums and rest homes, including limited care facilities for handicapped or elderly with a capacity in excess of five people;
4. Facilities for abused men/women/children in excess of five users;
5. Facilities owned or operated by non-profit service organizations for their own use.

C. Major Conditional Use Permit (CUP-3). A major conditional use permit shall be a permit for a project whose total developed value is greater than one million dollars ($1,000,000.00).

It further includes any project that does not fall within subsection A or B of this section.

D. Each conditional use permit listed within the specified zone indicates the level, (i.e., CUP-1 (minor); CUP-2 (intermediate) and CUP-3 (major)).

Applicants' Response: Acknowledged.

90203.02 Conditional use permit limitations.

A conditional use permit may only be processed for a use specifically identified within each zone or sub-zone, and only if the proposed use conforms to the general plan.

Where a specific use is not listed as an outright use or a use that could be allowed by the conditional use permit, within a zone, that use shall be strictly prohibited except as provided by Section 90203.10. Where a proposed use is in conflict with, or does not conform to the county's general plan, it shall be denied.

If in the determination of staff a proposed use is not consistent with the general plan, staff shall inform the applicant prior to an application being deemed complete. If the applicant withdraws the application at this point (prior to the hearing), the applicant shall be entitled to a full refund of all application fees paid to the department, less the actual cost to notice, advertise and staff costs incurred up to the time a withdrawal request is made.

If the applicant does not withdraw and the project proceeds to the commission, the applicant shall not be entitled to any refund.

Applicants' Response: Acknowledged.

90203.03 Application.

A written application (form provided by the planning and development services department) for a conditional use permit shall be filed with the planning and development services department, accompanied by all information identified under Section 90104.00, along with requisite fee(s) and any other information the department deems necessary.

Applicants' Response: Acknowledged.

90203.04 Authority of the planning director.

The planning director is granted authority to investigate, consider, approve and/or deny any minor conditional use permit application. The director acting as a hearing officer shall conduct a duly noticed public hearing and consider all relevant facts, and hear all proponents and opponents. Notice for the hearing shall be provided in accordance with Section 90104.03(A).

The planning director may administratively, without holding a public hearing, forward a conditional use permit application to the planning commission for hearing.

The planning director shall not have the authority to approve or deny any intermediate or major conditional use permit.

Applicants' Response: Acknowledged.

90203.05 Administrative process by director.

In order to clearly define the administrative process, the following procedures shall be followed by the department/director. This process and its time limits are only applicable to projects that are exempt from CEQA. Any project that requires compliance with CEQA will be processed within the applicable time limits provided by statute.

A. Within ten (10) working days from the receipt of an application, the department shall determine whether the application is complete or incomplete and if found incomplete or inconsistent with the general plan shall return the application to applicant.

B. The department shall within ten (10) working days after deeming the application complete issue a standardized public notice of the proposed project to all property owners as specified in Section 90104.03.

C. Within the ten (10) working days specified under subsection B of this section, the department shall consult with the applicable departments as necessary.

D. An administrative hearing shall be held within thirty (30) working days from the date the application was deemed complete. This hearing shall be open to the public.

E. At the conclusion of the hearing, the director shall approve, conditionally approve or deny the conditional use permit.

F. The director may approve a conditional use permit only if:

1. Findings can be made that the proposed project is consistent with the general plan;
2. Findings can be made that this project is consistent with this title;
3. The director of public works, the director of APCD, director of EHS, and the director of fire/OES have reviewed the proposed project and approved the project;
4. Public opposition has been considered and all impacts have been mitigated by the imposition of conditions;
5. Applicant agrees to all conditions and standards required for the project.

Applicants' Response: Acknowledged.

90203.06 Authority of the planning commission.

The planning commission shall have the authority to investigate, review, and approve or deny any conditional use permit application.

The planning commission's decision shall be final unless an appeal, (if so permitted by this title) is made to the board of supervisors and is filed with the clerk of the board within ten (10) calendar days as provided under Section 90101.10.

Applicants' Response: Acknowledged.

90203.07 Authority of the board of supervisors.

The board of supervisors shall have the authority to investigate, review, and approve or deny any conditional use permit application upon appeal from the planning commission's decision provided that the appeal is filed according to Section 90101.10. The board of supervisors shall not act upon any conditional use permit that has not first been reviewed by the planning commission and/or that was appealed after the ten (10) day appeal period. The board of supervisors' decision on any conditional use permit shall be final and no reconsideration or rehearing shall be allowed unless such request meets the provisions of Section 90101.10.

Applicants' Response: Acknowledged.

90203.08 Notice of hearing.

After acceptance of a completed conditional use permit application and the completion of a full staff report, the commission shall conduct a public hearing on the request. The notice and scheduling of the public hearing shall be pursuant to Section 90104.03(C).

Applicants' Response: Acknowledged.

90203.09 Action on a conditional use permit.

An application for a conditional use permit shall be reviewed, and approved, conditionally approved, or denied by the decision-making authority.

The authority may approve or conditionally approve an application only if it finds all of the following:

A. The proposed use is consistent with the goals and policies of the adopted county general plan;

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

C. The proposed use is listed as a use within the zone or sub-zone or is found to be similar to a listed conditional use according to the procedures of Section 90203.10;

D. The proposed use meets the minimum requirements of this title applicable to the use and complies with all applicable laws, ordinances and regulations of the county of Imperial and the state of California;

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

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

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

The decision-making authority shall deny an application if it cannot make all of the above findings.

Applicants' Response: Acknowledged.

90203.10 Similarity in use(s).

When an applicant proposes a use that is not specifically authorized or listed as a use or conditional use in the specific zone, he or she may apply for a determination of similar use to the planning commission through the following procedure. (The planning commission shall have final authority and no appeal to the board on "similarity" shall be allowed.)

A. Filing. A request for a "similar use" determination shall be in writing to the planning and development services department and shall explain in detail the proposed use and its similarity to an existing approved use within that zone.

B. Application Hearing. A request for similar use consideration shall not be heard concurrently with the hearing for allowing the use. At a minimum, the similar use hearing by the planning commission shall occur at least one hearing prior to the hearing to allow/deny the use.

C. Similar Use Criteria. In order for the planning commission to allow a use to be a similar use it shall first make the following findings:

1. The proposed use resembles or is of the same basic nature as an identified use or a conditional use in that zone.

2. The proposed use includes activities, equipment, or materials typically employed in the identified use.

3. The proposed use has equal to or less impacts on traffic, noise, dust, odor, vibration and appearance than the identified listed use.

4. All impacts identified could and would be mitigated through conditions.

5. The similar use, if allowed in the proposed zone, will not affect the health, safety and welfare of the public or impact the property and residents in the vicinity.

D. Noncomparison of Similar Use. An application for similar use shall be a comparison of the proposed use against that of an identified listed use in the zone or sub-zone. The commission shall not compare a proposed similar use against another previously approved similar use.

E. Continued Use. Once a use has been found to be similar by the commission, it shall be listed as such by the department within the applicable zoning division of this title and may be used by other applicants.

F. CEQA Exemption. The determination of similar use shall be a ministerial action and shall not require CEQA documentation.

Applicants' Response: Acknowledged.

90203.11 Terms/conditions.

The conditional use permit shall contain such terms and conditions that the decision-making authority determines necessary, and/or are conditions that mitigate specific impacts, and can make the appropriate findings.

Every permit approval shall contain both standard, as well as, site specific conditions. Among the standard conditions shall be:

A. Compliance with all laws;

B. Cost to offset on-going compliance mandates;

C. Time limitations;

D. Effective date(s).

Applicants' Response: Acknowledged.

90203.12 Effective date.

The approved conditional use permit shall not become effective until ten (10) calendar days after the decision of the planning director or commission. Further the conditional use permit shall not be effective until applicable conditions have been met, and the conditional use permit is recorded with the county recorder, with payment of recording fees being paid by applicant. In the case of a decision by the board of supervisors there is no ten (10) day appeal.

Applicants' Response: Acknowledged.

90203.13 Time limit/extensions.

If the project for which a conditional use permit has been approved has not commenced, or permits for said project have not been issued, within one year from approval date the conditional use permit shall be null and void. If a conditional use permit has been unused, abandoned, discontinued, or ceased for one year, the conditional use permit shall be null and void, and be of no effect. Notice to applicant/permittee under this division will not be required or provided by department.

If an applicant cannot initiate or obtain permits for the approved use during the one year, applicant may request a one year extension from the department. The request for an extension shall be in writing and be submitted with explanation to the planning and development services department at least sixty (60) days prior to the end of the one-year period. The director shall have the authority to extend the initial start up period of a conditional use permit two times for a maximum of one year each. No extension under this section shall be extended for more than two years.

Applicants' Response: Acknowledged.

90203.14 Monitoring/compliance.

Every conditional use permit shall be monitored by the planning and development services department with assistance from other departments as necessary. The permittee shall be required to pay for such monitoring costs according to the "time and materials" fee schedule adopted by the board of supervisors or as otherwise provided by the terms of the conditional use permit.

Permittee shall at all times be in compliance with all of the terms and conditions of the conditional use permit. In the event noncompliance is found, the permittee shall be given notice to correct by the planning and development services department. Failure to comply shall constitute grounds for revocation.

Applicants' Response: Acknowledged.

90203.15 Modifications/amendments.

All terms/conditions of approval shall be final. A request to delete, modify or change one or more condition(s) shall constitute a new application unless specifically allowed within the CUP. Such a modification only be considered at a regularly scheduled hearing of the decision-making authority.

Applicants' Response: Acknowledged.

90203.16 Revocation/suspension.

A conditional use permit may be suspended or revoked by the planning director, planning commission or board of supervisors for any of the following causes:

A. Any term or condition has not been complied with and the permittee has received at least one written correction order, via certified or return receipt mail or personal delivery;

B. The property or portion thereof subject to the conditional use permit is used or maintained in violation of the conditional use permit and/or any state law or ordinance of the Imperial County and/or state of California;

C. The use for which the conditional use permit was granted has been so exercised as to be detrimental to the public health or safety or as to constitute a nuisance;

D. Changes in technology in the type or amount of development in the area, or other condition warrants a modification of the conditions of operation, or warrants the imposition of additional conditions to assure that the use remains compatible with existing and potential uses within the vicinity.

Applicants' Response: Acknowledged.

CHAPTER 2 LAND USE PERMITS (VARIANCE)

90202.00 Purpose.

The purpose of this chapter is to define and establish guidelines for the processing of applications for variances.

Applicants' Response: Acknowledged.

90202.01 Variance defined.

A "variance" is an approval granted upon a legal parcel of land to construct a structure not otherwise directly allowed by the exact interpretation of Title 9, Divisions 1 through 8. A variance runs with the land and allows for minimal deviation from the standards.

Applicants' Response: Acknowledged.

90202.02 Variance limitation.

As an example the variance procedure shall not be used for any of the following:

A. To reduce or change the minimum parcel size required for a new land division;

B. To authorize land uses other than those specified or allowed under the specific land use categories as identified in this title;

C. To change the meaning or intent of a word/phrase listed within this title.

Applicants' Response: Acknowledged.

90202.03 Application.

A written application (form provided by planning and development services department) for a variance shall be filed with the department, accompanied by all information required under Section 90104.00, along with requisite fee and any other information the department deems necessary.

Applicants' Response: Acknowledged.

90202.04 Authority of the planning director.

The planning director is granted authority to investigate, consider, approve and/or deny a variance application. The director, acting as a hearing officer, shall conduct a noticed public hearing (ref. Section 90104.03(A)) and consider all relevant facts, and hear all proponents, and opponents.

The planning director may deny a variance administratively without holding a public hearing. Such a denial constitutes an automatic appeal to the planning commission for which the applicant shall not be required to pay the appeal fee.

Following a noticed hearing by the planning director, any party may appeal the director's decision to the planning commission, provided any such appeal is filed within ten (10) calendar days from the date of decision and is in accordance with the procedures specified in Sections 90102.04 and 90102.05.

Applicants' Response: Acknowledged.

90202.05 Administrative process by director.

In order to streamline the review process and clearly delineate the standards and rules, the following administrative procedure is established and shall be followed by the department for processing a variance application:

A. Within ten (10) days of receipt, the application shall either be deemed complete or be returned to the applicant with a written explanation if deemed incomplete.

B. Within ten (10) days from the date the application is deemed complete, a standardized public notice of pending variance shall be sent to all property owners pursuant to Section 90104.03.

C. During the same ten (10) day period as provided in subsection B of this section, the department will consult with the department of public works, and fire/OES and other applicable departments.

D. An administrative hearing shall be held within thirty (30) days from the date the application was deemed complete. This hearing shall be open to the public.

E. At the conclusion of the hearing, the director shall approve, conditionally approve or deny the variance. The director may continue the hearing, or the decision for up to ten (10) days, if necessary.

F. The director may approve a variance only if the findings can be made under Section 90202.08 and with a written concurrence from the director of public works and the director of fire/OES department.

G. Following the administrative hearing there shall be a ten (10) calendar day period during which any party may appeal the decision of the director to the planning commission. No construction or other county permits shall be approved until the ten (10) day appeal period has terminated and no appeal has been filed.

Applicants' Response: Acknowledged.

90202.06 Authority of planning commission.

The planning commission, upon appeal, shall have the authority to grant or deny a variance. No appeal from the director's decision shall be allowed to the board of supervisors unless and until the commission has reached a decision.

Applicants' Response: Acknowledged.

90202.07 Notice of hearing.

After acceptance of a completed variance application and the completion of a staff report, the commission shall conduct a public hearing on the variance request. The notice and scheduling of the public hearing shall be pursuant to Section 90104.03(C).

Applicants' Response: Acknowledged.

90202.08 Action on a variance.

The planning director, the planning commission and/or the board of supervisors, shall approve, approve subject to conditions or disapprove a variance with the following findings:

A. Findings. Approval or conditional approval may be granted only if the director/commission/board of supervisors first determines that the variance satisfies the criteria set forth in Government Code Section 65906, and the following findings can be made:

1. That there are special circumstances applicable to the property described in the variance application, that do not apply generally to the property or class of use in the same zone or vicinity;

Applicants' Response: The proposed wireless communications facility (WCF) would be located on APN 045-600-017. The parcel is zoned A-1 and is currently used primarily for residential and light agricultural purposes. Based on analysis by T-Mobile's RF engineers and Applicant research, this site was determined to be the most suitable location to meet the identified coverage objectives.

The proposed WCF is intended to provide continuous and improved wireless coverage throughout the City of Holtville. At present, this area is served by an existing T-Mobile tower at 32.8033, -115.3744, which does not provide adequate coverage to the north and northeast portions of the City. The new facility is specifically designed to enhance both voice and data services for the Holtville community, including Norrish Road, Holtville High School, Underwood Road, surrounding residential neighborhoods, commercial areas, and parks. Locating the facility closer to these denser population areas will reduce in-vehicle dropped calls and service interruptions, thereby maximizing coverage for the greatest number of residents and visitors.

The use of this parcel for a WCF represents a specialized use not generally applicable to other properties in the same zoning district. In accordance with §92401.04(5)(a), communication facilities must be constructed to the minimum functional height, with allowances for co-location unless a variance is approved concurrent with a CUP. The proposed tower has been designed at the lowest feasible height for T-Mobile's equipment and to accommodate up to three co-located wireless carriers.

The requested additional height of 20 feet (including the lightning rod), and the associated variance, are necessary to provide sufficient and reliable coverage to the surrounding community. Please see Attachment 15, T-Mobile Coverage and Engineering Justification, for supporting technical analysis.

2. That the granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvements in such zone or vicinity in which the property is located;

Applicants' Response: The proposed wireless tower will not be materially detrimental to the public welfare or injurious to the property. The WCF will be operated in compliance with the RF emission standards set forth by the FCC. Please see Attachment 16, EME Report. In the unlikely of a structural failure, standard engineering of wireless communication facilities incorporates a break point design to ensure that the tower would collapse within the leased compound and not extend beyond the property boundary. The proposed WCF will not limit or prohibit improvements in this zone and will develop only within the 40'x40' footprint of the lease area.

3. That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of zoning laws is found to deprive subject property of privileges enjoyed by other properties in the vicinity and under identical zone classifications;

Applicants' Response: The subject parcel (APN 045-600-017) is located within the A-1 zone, where the maximum allowable height is 60 feet. While wireless communications facilities are permitted in this zone, the height required for the proposed tower exceeds this limit and therefore requires a variance.
This parcel is uniquely suited for the proposed facility due to its location near residential areas and community-serving uses, while still providing adequate space and meeting required setbacks. The RF-targeted search ring includes parcels within the R-1-U, M-1-U, C-2-U, A-1-U, and one parcel in the A-2-U zone. Although A-2 parcels to the north allow structures up to 120 feet in height, their distance from Holtville's population center would not achieve the same coverage objectives and would increase aviation conflicts due to active agricultural operations and low-flying crop dusters.
By contrast, the proposed facility would not be located within agricultural fields, reducing aviation risks, while also placing coverage closer to the denser population areas of Holtville. Applicants evaluated co-location opportunities as well as 24 alternative parcels, and this site was determined to be the most appropriate based on zoning compatibility and the property owner's willingness to lease.
Strict enforcement of the 60-foot height limit would deprive this parcel of the ability to host a wireless facility comparable to those that could be permitted on nearby A-2 properties at heights up to 120 feet. Without the variance, this parcel—despite being the most suitable site identified—could not provide the reliable wireless coverage needed for the Holtville community at the necessary 80' (including the lightning rod).

4. That the granting of such variance will not adversely affect the comprehensive general plan.

Applicants' Response: The proposed WCF is consistent with the Urban Plan designation of the area. As stated in the Land Use Element, Urban areas are "characterized by a full level of urban services, in particular public water and sewer systems, and contain or propose a broad range of residential, commercial, and industrial uses" (pg. 3). The proposed WCF will provide improved coverage and access to wireless connectivity to the growing City of Holtville and the unincorporated area of Imperial County. It will provide opportunity for economic and community growth and therefore is consistent with this plan area.

B. Conditions of Approval. In approving a variance, the director/commission/board of supervisors may impose such conditions deemed necessary to enable making the findings listed under subsection A of this section.

Applicants' Response: Acknowledged

C. Denial of Variance. Where the director/commission/board of supervisors cannot make the findings under subsection A of this section (with or without conditions) the variance shall be denied.

(***Applicants' Response: Acknowledged.***

90202.09 Effective date of variance.

The approval of a variance shall become final and effective for purpose of construction permit issuance, on the eleventh day after the action of the director unless an appeal is filed within ten (10) days from the date of his or her decision.

The approval of a variance by the commission shall become effective on the eleventh day after the commission action granting the variance, unless an appeal is filed to the board of supervisors within ten (10) days. The approval of a variance by the board of supervisors becomes final on the day of the board's action.

Applicants' Response: Acknowledged.

90202.10 Time limit/extension.

An approved variance shall be valid for a period of twelve (12) months from effective date. At the end of such time period the variance shall become null and void unless:

A. A construction permit has been issued;

B. The project is complete and the use continues;

C. A time limit extension by the director has been granted in writing.

At any time the variance ceases to be used for a period of twelve (12) months, or the use upon which the original approval was granted has ceased or changed, the variance shall become null and void, without notice from the planning and development services department.

If an extension is necessary it must be requested at a minimum of sixty (60) days prior to its expiration date and must state in writing the reasons for the extension. The planning director may extend any variance upon written request without notice or hearing. Under no condition shall a variance be extended or renewed after it has expired or if the property covered by the variance is in violation of this title.

Applicants' Response: Acknowledged.

90202.11 Revocation/modification.

Any variance issued pursuant to this title may be revoked by the planning commission after a duly noticed public hearing in which the commission has found that subject variance is in violation of this title or applicable statutory law, or if it constitutes a health or safety hazard. The commission may also modify a variance through the public hearing process if it determines a necessity for public health or safety considerations.

Applicants' Response: Acknowledged.

END OF STATEMENT OF CODE COMPLIANCE.

ASSURANCE
DEVELOPMENT

Attachment 8

Zoning Drawings *(Revised)*

PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 80' MONOPOLE WITH (1) FTS 371 SMART TOWER BEACON, (1) FTS 371 BEACON CONTROLLER, (11) 8' ANTENNAS, (12) RRU'S, (1) 3' MICROWAVE, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) BACK-UP DIESEL GENERATOR, (1) 10'x15' ICE CANOPY, (2) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON H-FRAME WITHIN A 40'x40' FENCED LEASE AREA. NO WATER OR SEWER SERVICE IS REQUIRED. THIS WILL BE AN UNMANNED FACILITY.

CODE COMPLIANCE:

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

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

vertical bridge

US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

80' MONOPOLE

TENANT SITE ID: SD07772

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



VICINITY MAP
N.T.S.

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



LOCATION MAP
N.T.S.

PROJECT INFORMATION	
SITE NAME:	HOLTVILLE
SITE NUMBER:	US-CA-5363
TENANT SITE ID:	SD07772
SITE ADDRESS:	1734 E UNDERWOOD RD. UNIT 2 HOLTVILLE, CA 92250
PARCEL #:	045-600-017
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-1 LIMITED AGRICULTURAL (IMPERIAL COUNTY)
ZONING JURISDICTION:	IMPERIAL COUNTY
CONSTRUCTION TYPE:	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE:	MONOPOLE
STRUCTURE HEIGHT:	80'
CONSTRUCTION AREA:	1,600 SQ. FT.
GROUND ELEVATION:	-21.93' (NAVD88)
LATITUDE (NAD 83):	32.821183° (32° 49' 16.25" N)
LONGITUDE (NAD 83):	-115.386369° (115° 23' 10.92" W)

EMERGENCY:
CALL 911

DIGALERT UNDERGROUND SERVICE ALERT
(800) 642-2444
WWW.CALIFORNIA811.ORG
CALL 2 TO 14 WORKING DAYS UTILITY NOTIFICATION PRIOR TO CONSTRUCTION
811

PROJECT DIRECTORY	
PROPERTY OWNER:	GONZALES JESUS DIAZ & PRISCILLA (JT) 1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
APPLICANT:	VERTICAL BRIDGE 22 W ATLANTIC AVE, #310 DELRAY BEACH, FL | 33444
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE: 626.765.5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT
TELCO COMPANY:	AT&T

CLIENT
vertical bridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

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

NO.	SUBMITTAL / REVISION	BY	DATE
4	SITE RELOCATION	APP	02/25/25
3	WPD COMMENTS	APP	09/19/25
2	WPD COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	06/18/25
0	ISSUED FOR ZONING	JR	06/03/24
A	ISSUED FOR REVIEW	CV	05/15/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER
US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

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TITLE SHEET

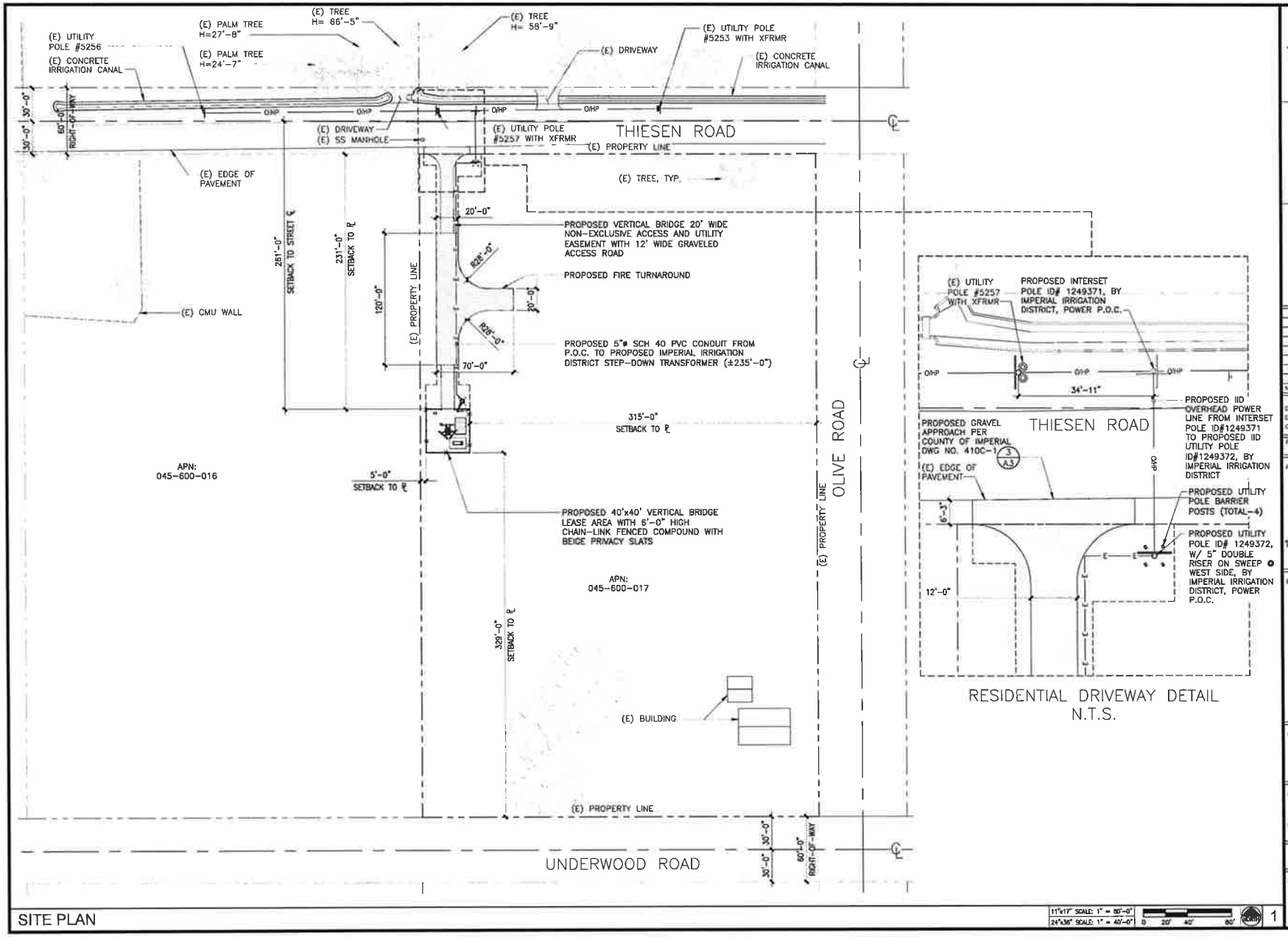
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AS NOTED

DATE
09/04/25

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

DRAWING NUMBER
T1



SITE PLAN

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

1

CLIENT

verticalbridge

22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1489 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
6	SITE RELOCATION	APP	02/26/26
3	WPG COMMENTS	APP	09/19/25
2	WPG COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/19/25
0	ISSUED FOR ZONING	JR	08/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER
US-CA-5363

PROJECT TITLE

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE

SITE PLAN

DRAWING SCALE
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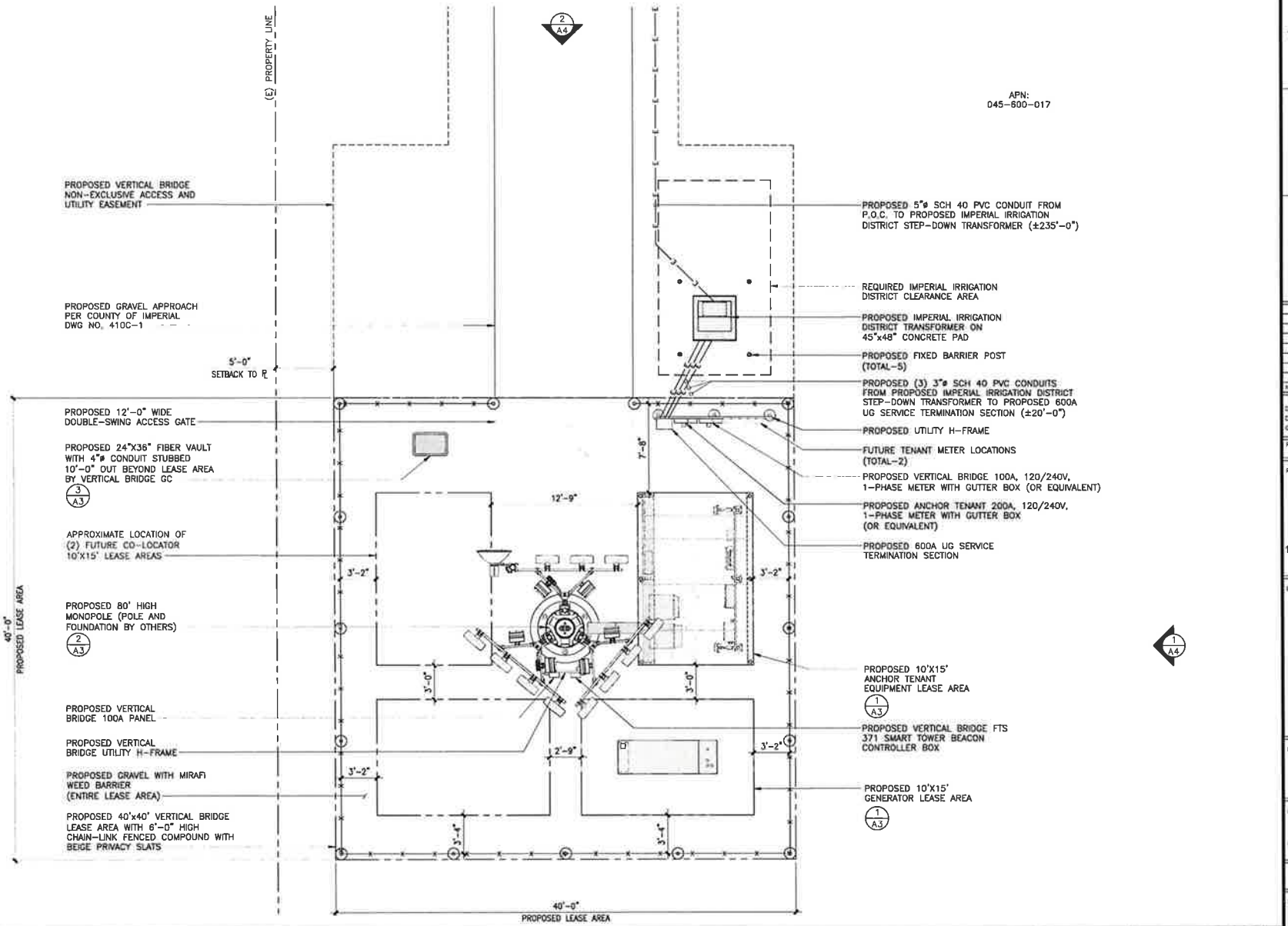
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09/04/25

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DRAWING NUMBER

A1



ENLARGED COMPOUND PLAN

11"x17" SCALE: 1" = 80'-0"
24"x36" SCALE: 1" = 30'-0"
0 15' 30' 60'
NORTH

1

CLIENT
verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

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

NO.	SUBMITTAL / REVISION	BY	DATE
4	SITE RELOCATION	APP	02/26/26
3	WPD COMMENTS	APP	09/19/25
2	WPD COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/18/25
0	ISSUED FOR ZONING	JR	08/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

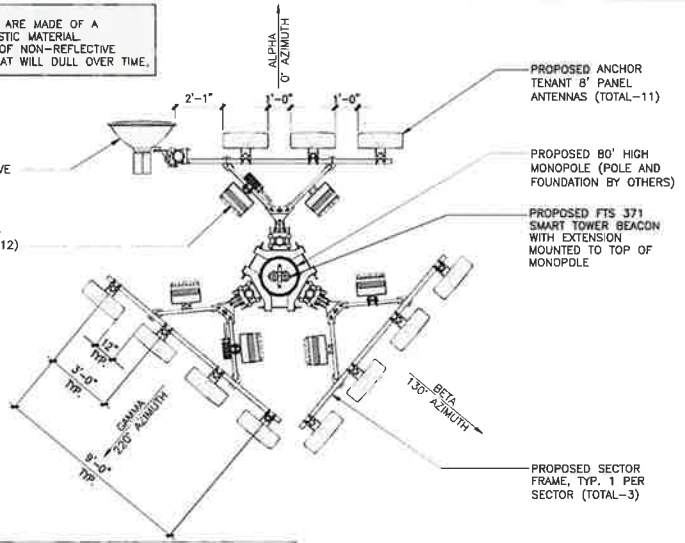
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ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED
DATE: 09/04/25
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UNAUTHORIZED ALTERATION OR ADDITION TO THIS DOCUMENT IS A VIOLATION OF APPLICABLE STATE AND / OR LOCAL LAWS

DRAWING NUMBER
A2

NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.

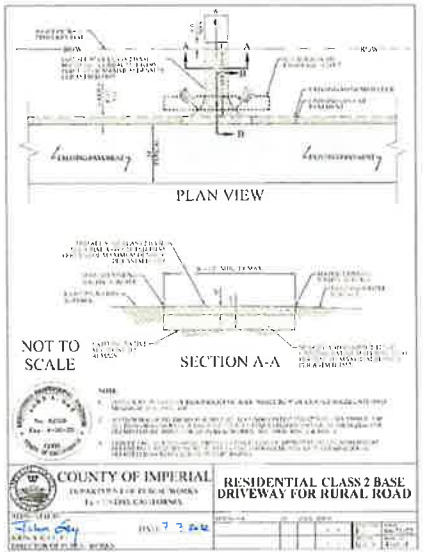


BEACON NOTES:
1. PERMITTEE SHALL INSTALL A WHITE MEDIUM INTENSITY STROBE BEACON (FOR DAYLIGHT USE ONLY) AND A RED FLASHING WARNING LIGHT (FOR NIGHTTIME USE ONLY) TO WARN AIRCRAFT IN THE VICINITY.

ANTENNA PLAN

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

2



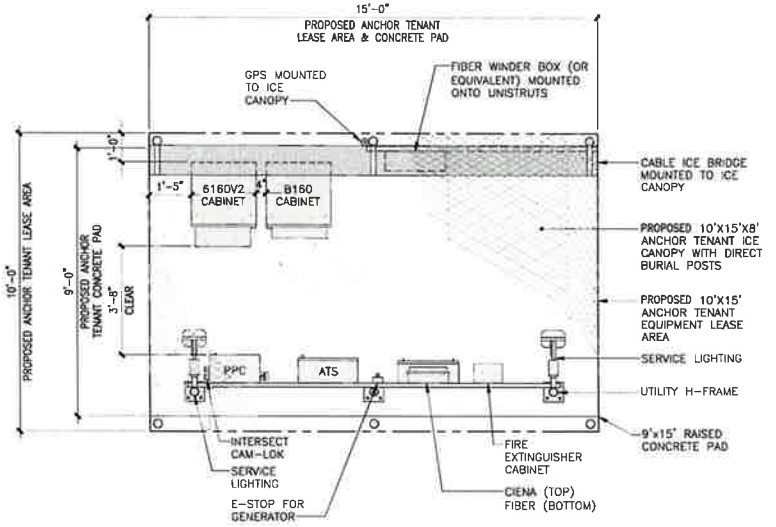
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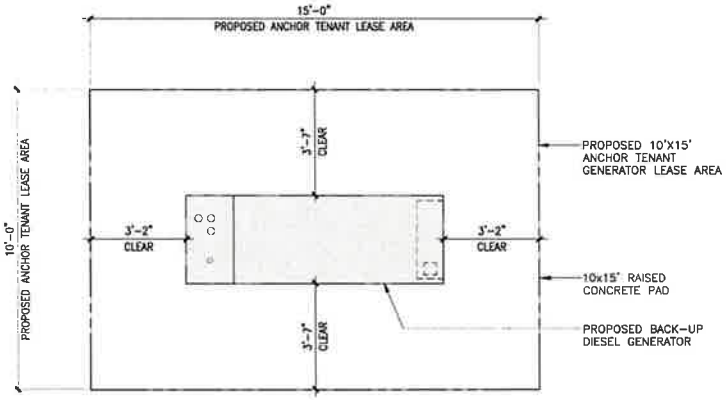
SCALE N.T.S.

3

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

SERVICE LIGHTING SPECIFICATIONS:
MODEL: PLTS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2097 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN

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

1

CLIENT
verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

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

NO	SUBMITTAL / REVISION	BY	DATE
4	SITE RELOCATION	APP	02/26/26
3	WPG COMMENTS	APP	09/19/25
2	WPG COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/19/25
0	ISSUED FOR ZONING	JR	08/30/24
A	ISSUED FOR REVIEW	CV	08/19/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER
US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
EQUIPMENT AND ANTENNA PLAN

DRAWING SCALE
AS NOTED

DATE
08/04/25

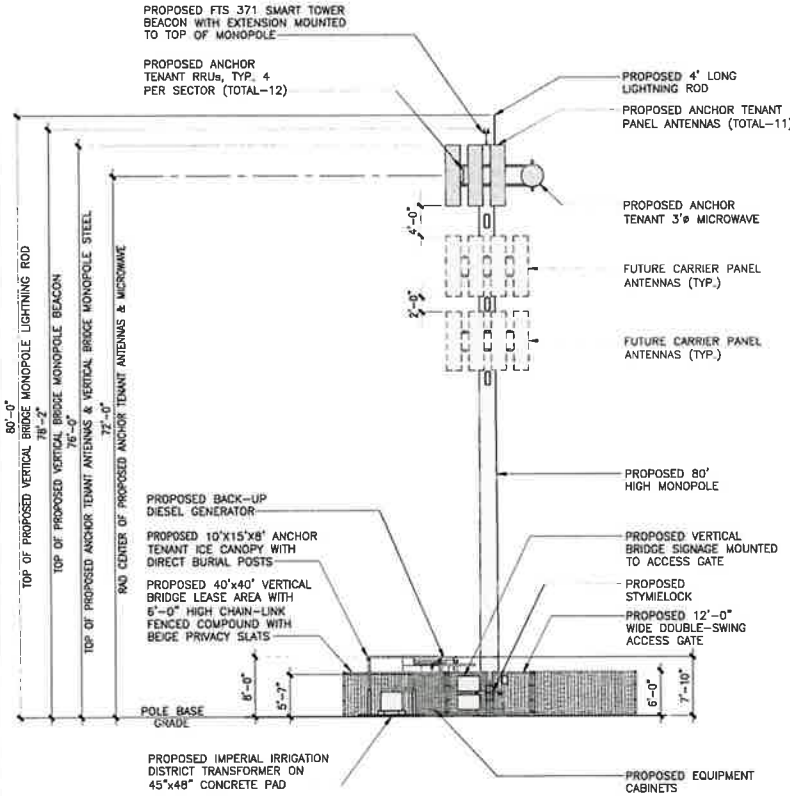
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DRAWING NUMBER
A3

NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.

BEACON NOTES:
1. PERMITTEE SHALL INSTALL A WHITE MEDIUM INTENSITY STROBE BEACON (FOR DAYLIGHT USE ONLY) AND A RED FLASHING WARNING LIGHT (FOR NIGHTTIME USE ONLY) TO WARN AIRCRAFT IN THE VICINITY.



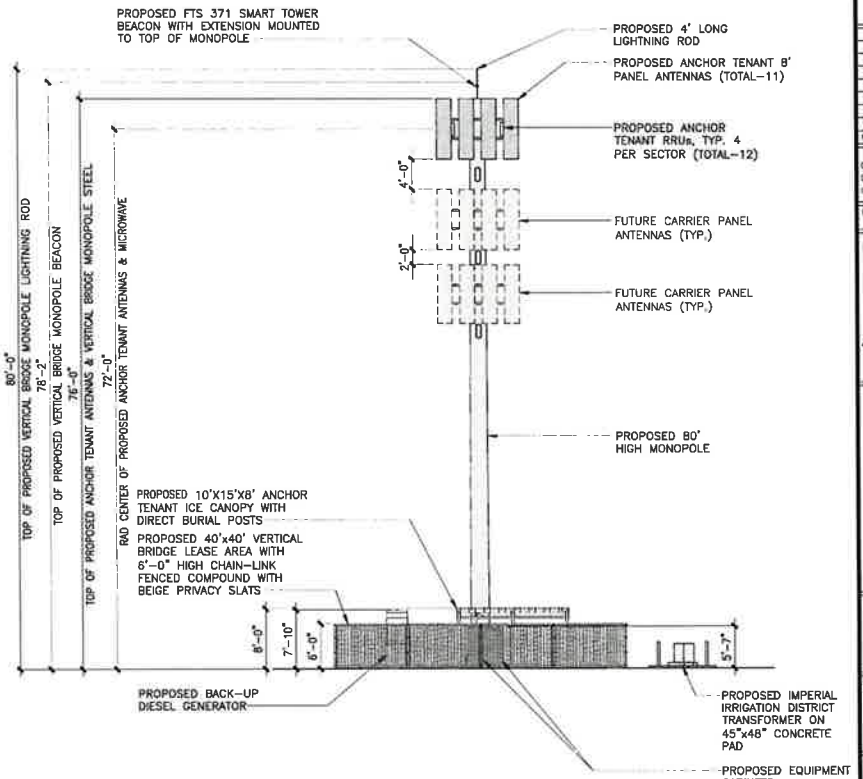
NORTH ELEVATION

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

2

NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.

BEACON NOTES:
1. PERMITTEE SHALL INSTALL A WHITE MEDIUM INTENSITY STROBE BEACON (FOR DAYLIGHT USE ONLY) AND A RED FLASHING WARNING LIGHT (FOR NIGHTTIME USE ONLY) TO WARN AIRCRAFT IN THE VICINITY.



EAST ELEVATION

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

1

CLIENT
verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5078

NO	SUBMITTAL / REVISION	BY	DATE
4	SITE RELOCATION	APP	02/26/25
3	WPD COMMENTS	APP	09/18/25
2	WPD COMMENTS	JR	08/04/25
1	PLANNING COMMENTS	JR	08/18/25
0	ISSUED FOR ZONING	JR	08/30/24
A	ISSUED FOR REVIEW	CV	05/19/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER
US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
ELEVATIONS

DRAWING SCALE
AS NOTED
DATE
08/04/25

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DRAWING NUMBER
A4

ASSURANCE
DEVELOPMENT

Attachment 9

Alternative Sites Analysis *(Revised)*

Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

Updated: 3/11/2026

Summary

In planning to meet its coverage objective, T-Mobile's Radio Frequency ("RF") engineers performed an RF engineering analysis, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the technical network objectives for the targeted service area. From this analysis, T-Mobile's RF engineers identified a 'search ring' area where a wireless facility may be located to provide effective service in the target coverage area. This facility is proposed to provide coverage to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks. In order to provide the coverage determined by T-Mobile RF Engineers, Applicants are requesting a variance for the total height of the tower at 80' for the reasons explained in Attachment 15, T-Mobile Coverage Objective & Engineering Justification.

There are numerous factors that must be considered when identifying an appropriate location for a new facility. These include T-Mobile's coverage objectives and the existing network infrastructure, adherence to local regulations, the presence of natural and man-made barriers, the availability of suitable sites with owners amenable to entering into an agreement, and the potential impact on aesthetics. Applicants assessed both the determined search area and the area surrounding Holtville to determine feasible candidates for the proposed facility. Twenty-four alterative candidates are presented in this document. Eventually, the analysis focused solely on the search area provided, and the proposed location at 1734 E Underwood Rd, Unit 2, Holtville, CA 92250 in Imperial County is the culmination of evaluating all critical factors and alternatives.

The Imperial County Code § 92401.06 requires that the alternative analysis shall include (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County.

Collocation on Existing Towers

Whenever possible, T-Mobile seeks to construct new sites on existing infrastructure before proceeding with the construction of a new free-standing facility. Before allocating a search area to an infrastructure provider like VB BTS III, LLC, T-Mobile conducts thorough research, ensuring all collocation opportunities are explored and exhausted. The search ring in this case does not contain any existing wireless towers. Therefore, Applicants then analyzes the existing towers within a three-mile radius of the proposed site. Please see Figure C of this document.

There are three existing towers within a two-mile radius of the proposed site. There is limited space available on these towers for co-location, and they do not offer the height required to meet T-Mobile's coverage objectives for the proposed facility. Applicants are limited in co-location opportunities as the proposed site is designed to supplement and provide continuous coverage throughout Holtville. Opportunities are limited due to the existing T-Mobile facility located at coordinates 32.821183°, -115.386369°. It was determined that collocating on an existing tower was not a feasible alternative, and further analysis is included in the table on page 7 of this document.

Collocation on Existing Non-Tower Structures @ 76' antenna tip height AGL

There are no structures within the search area that can support the required height of 76' to meet the coverage objectives for this tower. The buildings in this area are residential structures at heights ranging from 20'-35'.

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

Figure A: T-Mobile Alternative Candidates Map

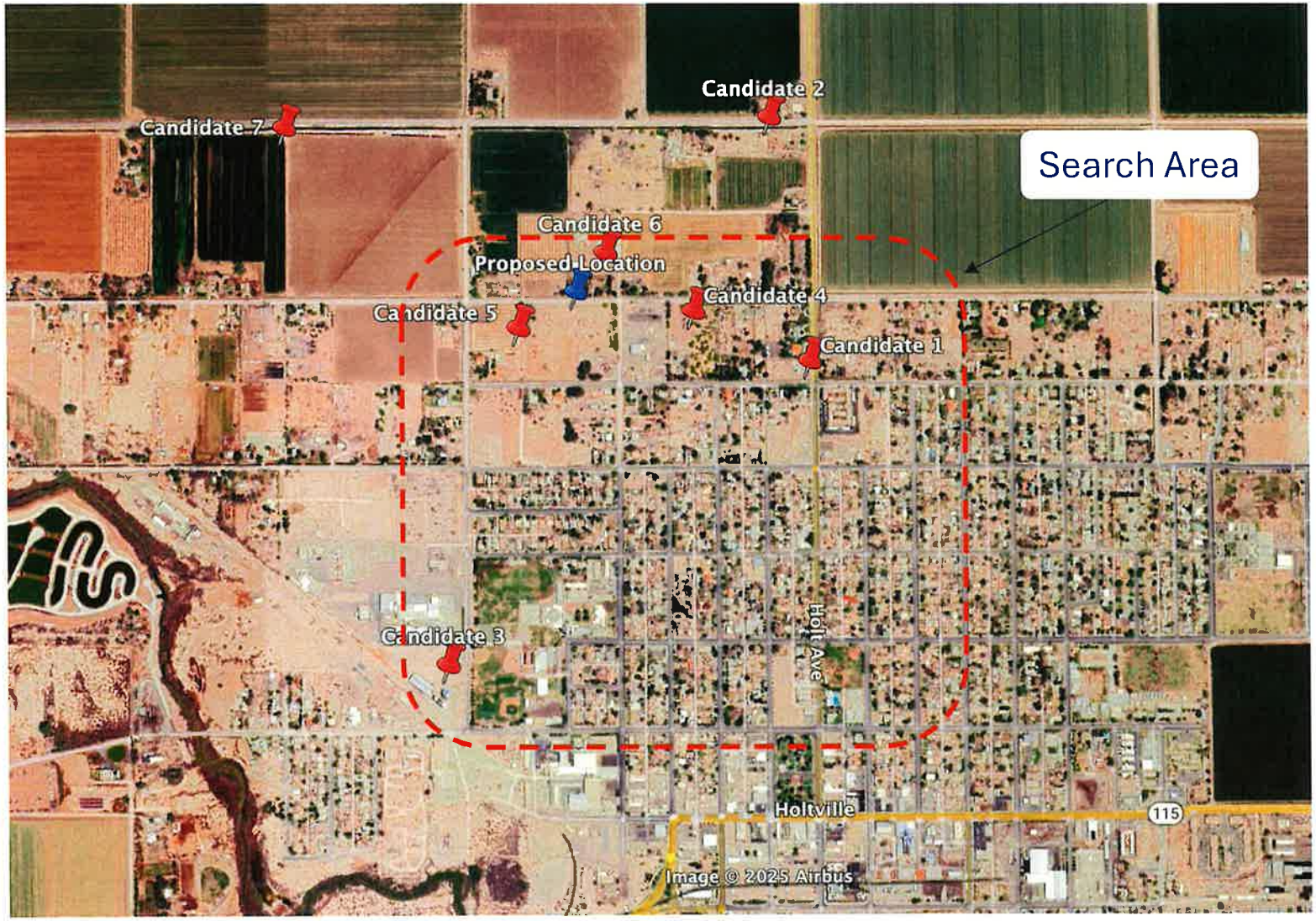


Figure B: Additional Property Owners Contacted (No Response)

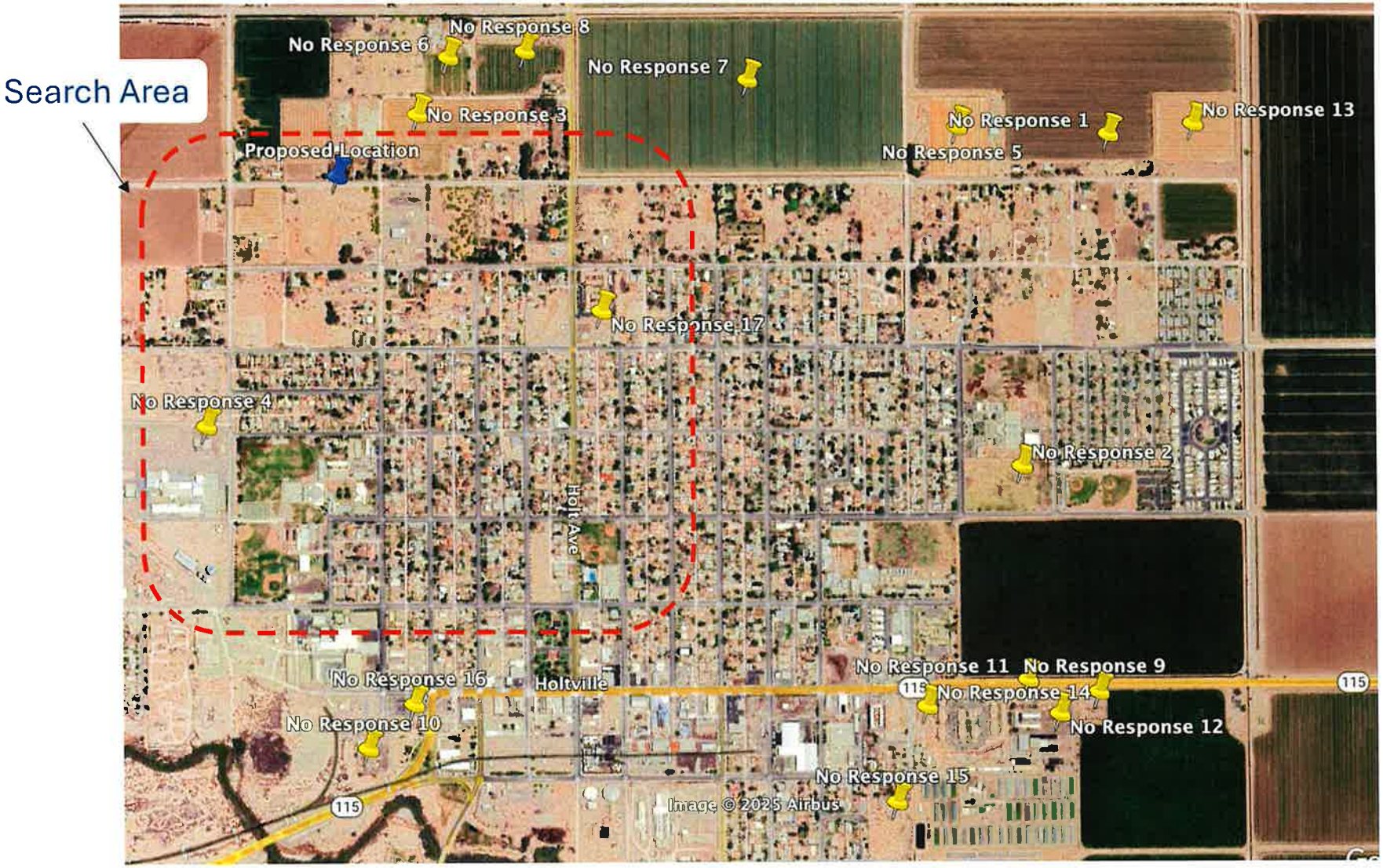
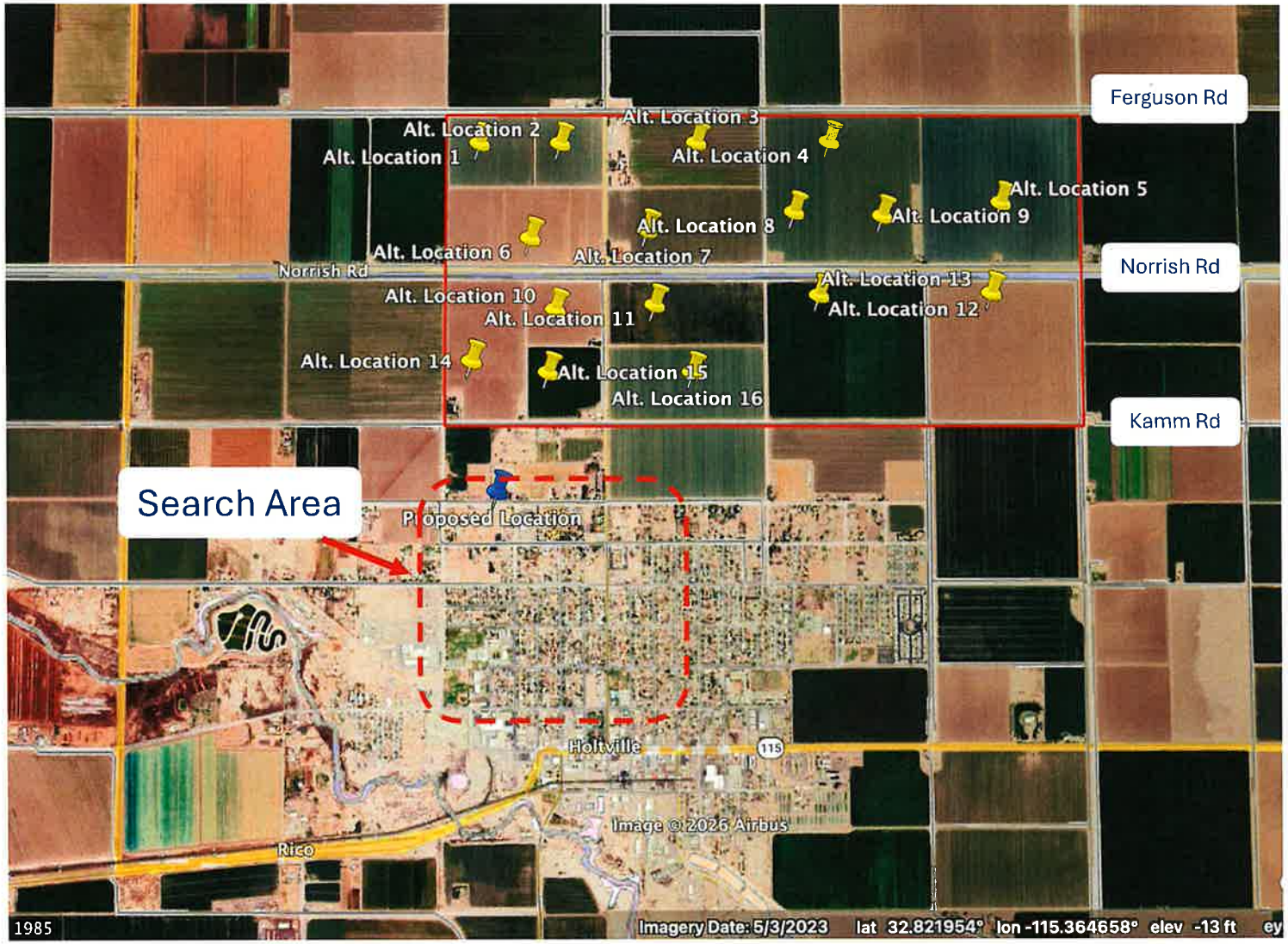


Figure C: Additional Property Owners Contacted (A-2)



Alternative Analysis Summary – Additional Property Owners Contacted (A-2)

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
1	APN: 045-040-029 Owner: Kevin & Kim Grizzle	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
2	APN: 045-040-031 Owner: Kevin & Kim Grizzle	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
3	APN: 045-040-067 Owner: Schaffner Dairy Inc	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
4	APN: 050-040-001 Owner: Strahm & Stergios Trust	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location. Although interest in leasing space for a wireless facility was expressed, the property owner identified a different parcel as the preferred location (Alternative 11, APN 045-040-035), and this site was removed from further consideration.
5	APN: 050-040-004 Owner: Greta Strahm Stergios	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location. Although interest in leasing space for a wireless facility was expressed, the property owner identified a different parcel as the preferred location (Alternative 12, APN 050-040-020), and this site was removed from further consideration.
6	APN: 045-040-030 Owner: Chell Ranches LP	Zoning: A-2 Land Use: Agriculture	Y	N	The site was considered as an alternative location. Although initial interest in leasing space for a wireless facility was expressed, the site was ultimately unavailable and removed from further consideration.

7	APN: 045-040-034 Owner: Paz Properties LLC	Zoning: A-2 Land Use: Agriculture	Y	N	The site was considered as an alternative location. Although initial interest in leasing space for a wireless facility was expressed, the site was ultimately unavailable and removed from further consideration.
8	APN: 050-040-064 Owner: Strahm & Stergios Trust	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location. Although interest in leasing space for a wireless facility was expressed, the property owner identified a different parcel as the preferred location (Alternative 11, APN 045-040-035), and this site was removed from further consideration.
9	APN: 050-040-003 Owner: Strahm & Stergios Trust	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location. Although interest in leasing space for a wireless facility was expressed, the property owner identified a different parcel as the preferred location (Alternative 11, APN 045-040-035), and this site was removed from further consideration
10	APN: 045-040-038 Owner: Chimits Home Ranch LLC	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
11	APN: 045-040-035 Owner: Clifford & Frances Strahm	Zoning: A-2 Land Use: Agriculture	Y	N	The site was considered as an alternative location. Although initial interest in leasing space for a wireless facility was expressed, the site was ultimately unavailable and removed from further consideration.
12	APN: 050-040-020 Owner: Greta Strahm Stergios	Zoning: A-2 Land Use: Agriculture	Y	N	The site was considered as an alternative location. Although initial interest in leasing space for a wireless facility was expressed, the site was ultimately unavailable and removed from further consideration.

13	APN: 050-040-019 Owner: Clifford & Frances Strahm	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location. Although interest in leasing space for a wireless facility was expressed, the property owner identified a different parcel as the preferred location (Alternative 11, APN 045-040-035), and this site was removed from further consideration
14	APN: 045-040-056 Owner: Chimits Home Ranch LLC	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
15	APN: 045-040-037 Owner: Nature Fresh Farms	Zoning: A-2 Land Use: Agriculture	Y	N	The applicants contacted the property owner to assess potential interest in leasing space for a wireless facility. No response was received, and the location was deemed infeasible.
16	APN: 045-040-036 Owner: Baker Trust	Zoning: A-2 Land Use: Agriculture	Y	N	This site was considered as an alternative location both during this phase of the project and in the early stages of the project. No response was received, and the location was deemed infeasible.

Figure D: Existing Towers within Two Miles of Proposed Facility



Alternative Analysis Summary – Towers within Two Miles of Proposed Facility

	Location	Distance to Proposed Facility	Feasible? (Y/N)	Summary
Collocation on Existing Towers				
1	32.8127, -115.3882	Approx. 0.6 Miles	N	This approx. 80' Microwave tower is owned by the Imperial Irrigation District, Telecommunications Section. The height of the tower and potential antenna placement for a new carrier would likely not adequately serve the coverage objectives and does not appear to structurally support the equipment needed for the proposed facility for T-Mobile and future carriers.
2	32.81150833, -115.404900	Approx. 1.3 Miles	N	This approx. 160' lattice tower is located outside of the desired coverage area and the location of T-Mobile's equipment on this tower would not provide sufficient coverage to Holtville. Additionally, the proposed tower aims to provide improved and continuous coverage throughout Holtville by supplementing the existing T-Mobile facility to the south and this tower would not provide meet the coverage objectives to the north.
3	32.8033, -115.3744	Approx. 1.4 Miles	N	This approx. 100' lattice tower supports existing T-Mobile equipment. As the proposed site location is intended to provide improved and continuous coverage throughout Holtville, this tower would not be a feasible opportunity for co-location.

Figure E: Imperial County Zoning Map

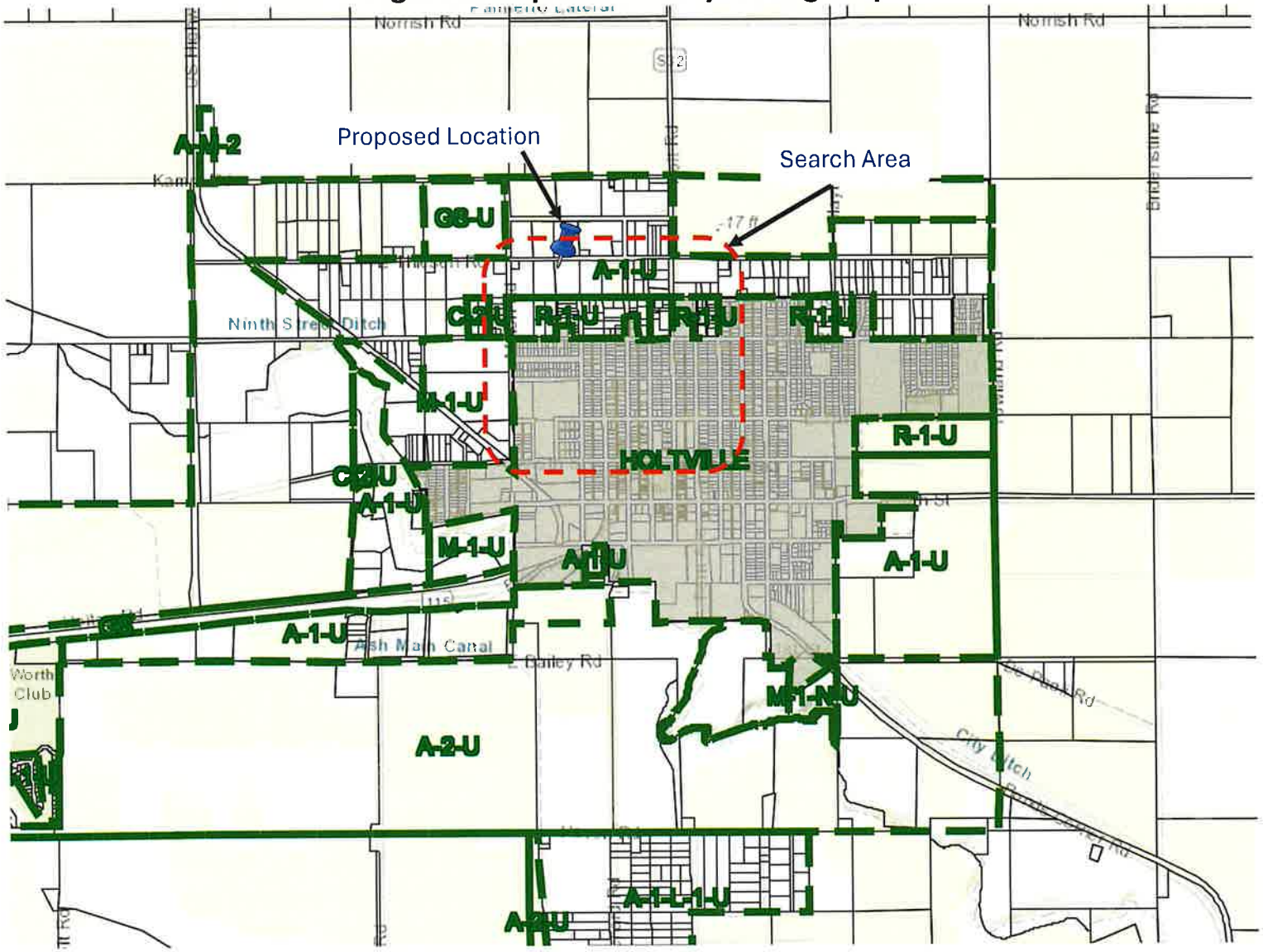
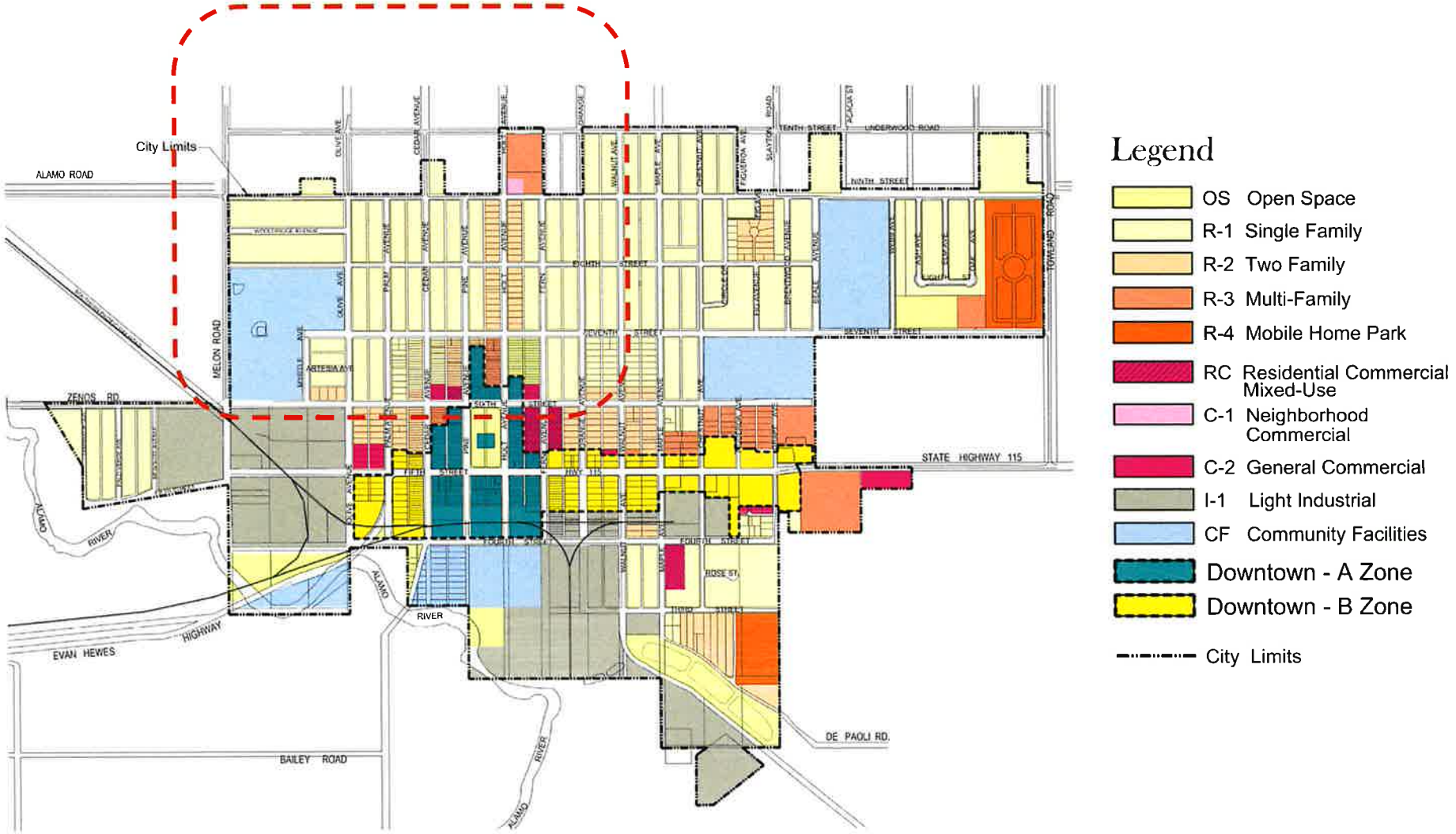


Figure F: City of Holtville Zoning Map

The City of Holtville discourages communications facilities within residential zones. The majority of the designated search area is comprised of R-1, R-2, and CF. The maximum height limit in these zones is 35' without a variance.



Alternative Analysis Summary – T-Mobile Alternative Candidates

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
	APN: 045-600-017 Address: 1734 E Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	The Proposed Location was selected as the best and least intrusive option for the proposed WCF because there were no feasible collocation opportunities, and there were no feasible zoned parcels as demonstrated herein. As Planning determined, wireless communications facilities are permitted within the A-1 zone.
New Tower Location Alternatives					
1	APN: 045-600-015 Address: 2331 Holt Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process due to development of a residence on the property and the Applicants could not move forward with locating a tower on this property.
2	APN: 045-580-012 Address: 2392 Holt Rd.	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
3	APN: 045-570-063 Address: N/A	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and

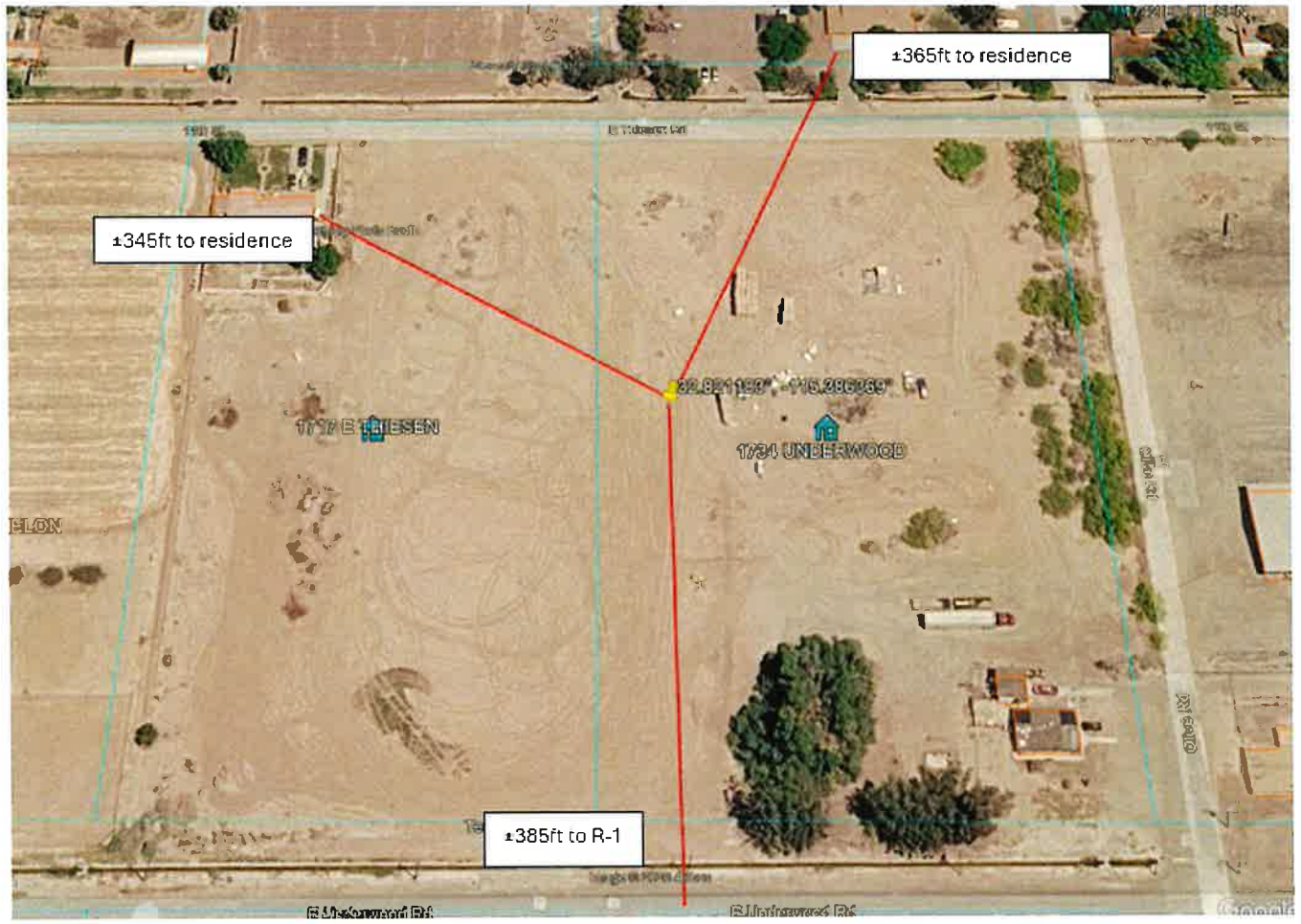
	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
					the Applicants could not move forward with locating a tower on this property.
4	APN: 045-600-004 Address: 1752 Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
5	APN: 045-600-019 Address: 2326 Melon Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
6	APN: 045-590-003 Address: 1736 Thiesen Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
7	APN: 045-080-085 Address: 1642 E Thiesen Ave	Zoning: A-2 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.

Alternative Analysis Summary – Additional Property Owners Contacted (No Response)

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
1	APN: 050-200-005 1966 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
2	APN: 045-621-001 800 BEALE	Zoning: CF Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
3	APN: 045-590-005	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
4	APN: 045-570-088 2255 MELON Rd	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
5	APN: 050-200-004 1904 E THIESEN	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
6	APN: 045-580-007 1749 E KAMM Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
7	APN: 045-040-036	Zoning: A-1 / A-2 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
8	APN: 045-580-009 2377 HOLT Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
9	APN: 045-610-009 1995 E HWY 80 Dr	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
10	APN: 045-242-008 405 OLIVE Rd	Zoning: I-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

11	APN: 045-610-005 1090 E FIFTH	Zoning: C-2 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
12	APN: 045-610-006	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
13	APN: 050-200-002 1990 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
14	APN: 045-610-025 820 E 5TH St	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
15	APN: 045-634-013 710 EA 4TH St	Zoning: R-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
16	APN: 045-281-008	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
17	APN: 045-440-064	Zoning: R-3 / C-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

Figure G: Setback from Residences and Residential Zone (R-1)



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DEVELOPMENT

Attachment 13

Photo Simulations *(Revised)*

AERIAL MAP



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NO.	DATE	REVISIONS	BY
0	1/06/2026	ISSUED FOR SUBMITTAL	JFY
1	8/28/2026	VIEW A REVISED	JFY
2	9/15/2026	INSTALL SLATS	JFY
3	3/11/2026	REV HEIGHT/LOCATION	JFY

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD, UNIT 2
HOLTVILLE, CA 92250

VIEW	SHEET
A	1 / 4

AERIAL MAP



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vertical bridge

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HOLTVILLE
1734 E UNDERWOOD ROAD, UNIT 2
HOLTVILLE, CA 92250

VIEW	SHEET
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AERIAL MAP



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ASSURANCE DEVELOPMENT

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0	1/06/2026	ISSUED FOR SUBMITTAL	JFY
1	2/20/2026	VIEW A REVISED	JFY
2	3/15/2026	INSTALL SLATS	JFY
3	3/11/2026	REV HEIGHT/LOCATION	JFY

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD, UNIT 2
HOLTVILLE, CA 92250

VIEW	SHEET
C	3 / 4

AERIAL MAP



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NO.	DATE	REVISIONS	BY
0	1/06/2026	ISSUED FOR SUBMITTAL	JFY
1	8/28/2026	VIEW A REVISED	JFY
2	9/15/2026	INSTALL SLATS	JFY
3	3/11/2026	REV HEIGHT/LOCATION	JFY

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HOLTVILLE, CA 92250

VIEW	SHEET
D	4 / 4

ASSURANCE DEVELOPMENT

Attachment 15

T-Mobile Coverage Objective and Engineering Justification *(Revised)*

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COVERAGE OBJECTIVE & ENGINEERING JUSTIFICATION

Holtville-SD07772C

03/05/2026

Prepared by: Toan Vu

T-Mobile Confidential

COVERAGE JUSTIFICATION

OVERVIEW

Vertical Bridge is proposing to build a new structure for the future collocation of multiple carriers at 1734 East Underwood Rd, Holtville, in unincorporated Imperial County. T-Mobile is proposing to collocate its equipment at the 119 ft (antenna tip height) elevation on the new stealth structure.

This proposed facility meets T-Mobile's coverage and capacity objectives by providing reliable 5G and 4G wireless coverage within an area northeast of Holtville and the surrounding area, not adequately served by T-Mobile's network.

Specifically, this proposed new wireless facility is intended to improve both voice & data services to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks.

This coverage and capacity objectives were determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This facility will allow T-Mobile to provide more reliable wireless service with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area.

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COVERAGE JUSTIFICATION (CONT.)

FEDERAL LAW The Telecommunications Act of 1996 prohibits a local jurisdiction from taking any action on a wireless siting permit that "prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(i)(II).

- According to the Federal Communications Commission ("FCC") Order adopted in September 2018, a local jurisdiction's action has the effect of prohibiting the provision of wireless services when it "materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment." Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.
    - *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part*, *City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").
- A local government's denial of an application to install a personal wireless service facility has the effect of prohibiting the provision of personal wireless service if materially inhibits or limits T-Mobile's ability to deploy the facilities, technologies, or services that conform to T-Mobile's network standards and objectives.

COVERAGE JUSTIFICATION (CONT.)

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

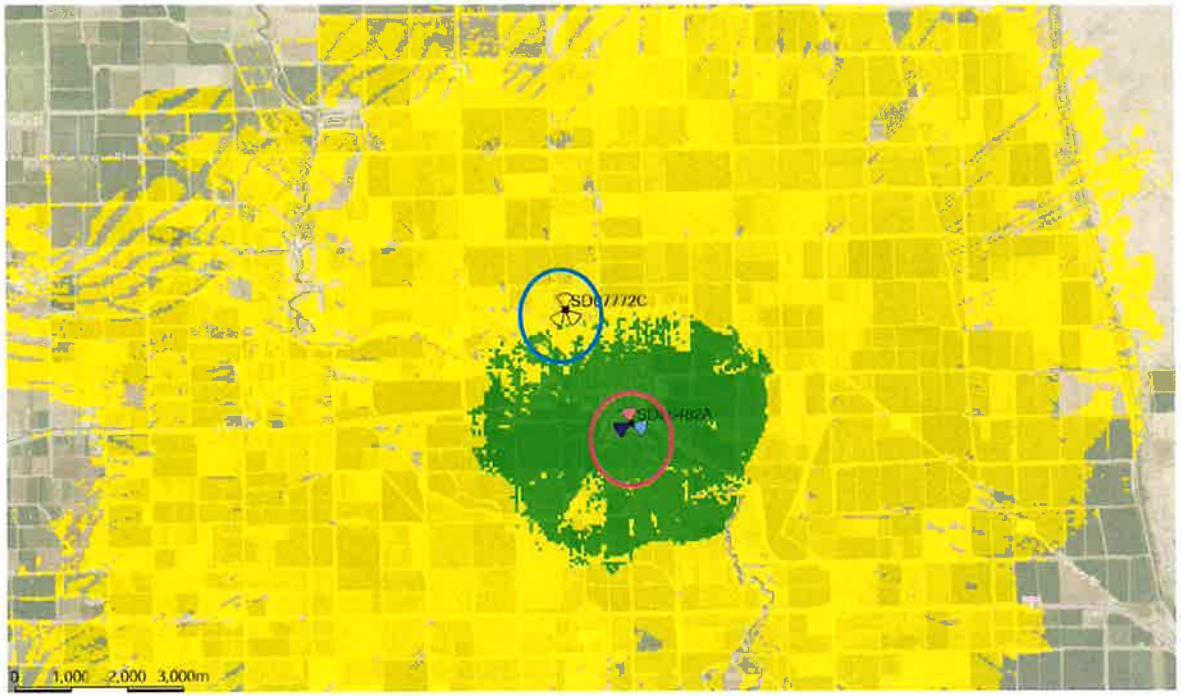
- **Significant Gap**. Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City,* 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007*), affirmed in part,* 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco,* 2006 WL 1699580, *10-11 (N.D. Cal. 2006).
- **Least Intrusive Means.** The least intrusive means standard "requires that the provider 'show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

COVERAGE JUSTIFICATION (CONT.)

COVERAGE OBJECTIVE

- **Figure A —Existing T-Mobile Coverage.** Shows existing T-Mobile wireless services in the general area of the proposed new site, which demonstrates the current deficiency in coverage in the targeted service area. The blue circle indicates the location of the proposed new WCF, the magenta circle indicates the location of existing T-Mobile WCF sites; coverage from T-Mobile existing WCF sites is shaded in green. As can be seen, there is a coverage deficiency in all areas not shaded in green. Currently, the target coverage area has minimal to no 5G/4G reliable service.
- **Figure B—Projected New T-Mobile Coverage at 119 ft. (Requested Height).** Identifies the projected coverage from the proposed new WCF with the requested antenna tip height of 119 ft. The proposed antenna tip height is the minimum necessary to help fill the coverage objective relative to nearby complementary wireless facilities & to serve the max possible population. This is also the height where a T-Mobile wireless device can be reliably used to make and receive telephone calls and use data service in the presence of varying signals.
- **Figure C—Comparison of Projected T-Mobile Coverage at 119 ft. (Requested Height) vs. 76 ft. vs 60 ft (Base Zone Height).** Shows a comparison of the projected coverage from the proposed new WCF if limited to the maximum height permitted in the A-1 zone without a height variance. A facility limited to the base zone height of 60 ft. would result in a [18%] reduction in square miles receiving reliable coverage(5.88 miles at 119 ft vs 4.97 miles at 60 ft), and [82%] reduction in the new population receiving reliable coverage (2,475 residents at 119 ft vs. 930 residents at 60 ft.). A facility limited to the height of 76 ft. would result in a [14%] reduction in square miles receiving reliable coverage(5.88 miles at 119 ft vs 5.03 miles at 76 ft), and [24%] reduction in the new population receiving reliable coverage (2,475 residents at 119 ft vs. 1,878 residents at 76 ft.) T-Mobile has determined that a higher antenna tip height is the height recommended at this location for the effective operation of its wireless network and to meet its service objectives.

FIGURE A – EXISTING SERVICE WITHOUT THE PROPOSED SITE



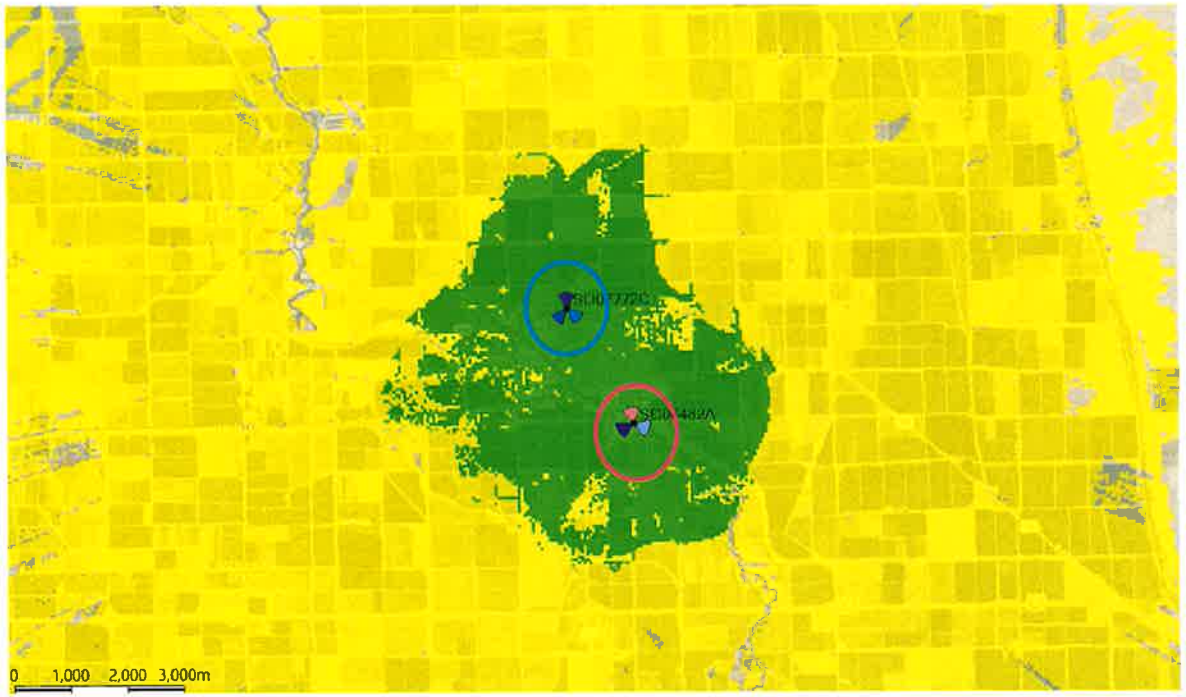
MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)	
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

Legend

- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

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FIGURE B – PROJECTED SERVICE WITH THE PROPOSED SITE @ 119' TIP HEIGHT AGL



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)	
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

Legend

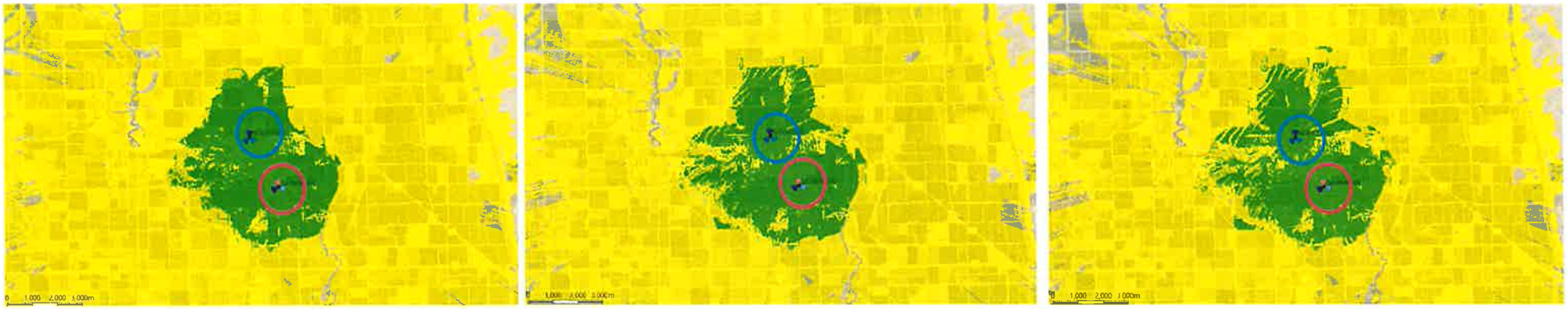
- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

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FIGURE C – COMPARISON OF COVERAGE FROM PROPOSED SITE: 119' VS 76,' 60' TIP HEIGHT AGL

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

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



Legend	POPs-Reliable Coverage	Net Change	% Change
Existing +New 119' Tower	5,789	2,475 Residents	
Existing +New 76' Tower	5,192	1,878 Residents	-24%
Existing +New 60' Tower	4,244	930 Residents	-82%

Tower Height	% Reliable Coverage-Square miles	% Change
119' Tower	5.88	
76' Tower	5.03	-14%
60' Tower	4.97	-18%

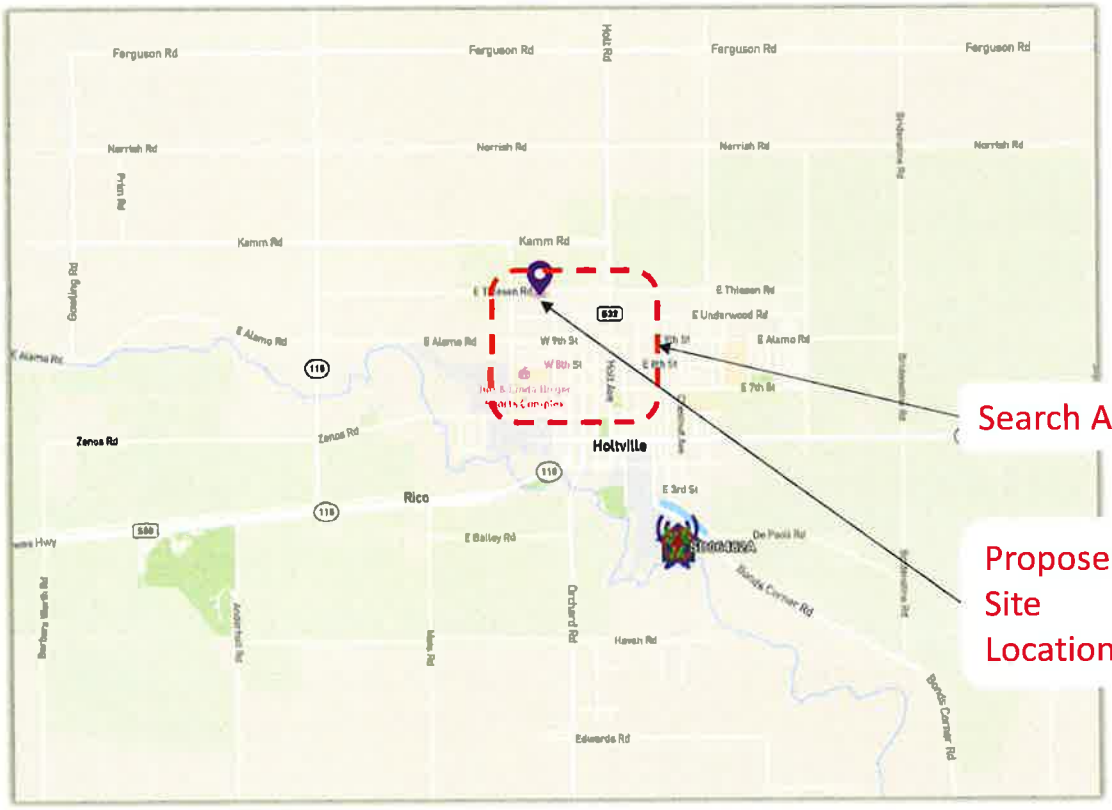
REGIONAL NETWORK ENGINEERING & OPERATIONS
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ALTERNATIVE SITE ANALYSIS

SEARCH RING

- T-Mobile's radio frequency ("RF") engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, T-Mobile's RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.
- **Figure D —Targeted Search Ring** indicates the search ring T-Mobile's RF engineers established for this proposed site. A discussion of the methodology T-Mobile's RF engineers used to identify the search ring is included at the end of this RF Justification document.

FIGURE D – TARGETED SEARCH RING



- Search Ring is to cover the main population areas in city of Holtville
- TMO has only 1 existing site to the south that is not able to cover the needed areas

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

COVERAGE METHODOLOGY

T-Mobile's RF engineers use the following signal strength standards to demonstrate the quality of coverage depicted on the maps herein.

- **Reliable Coverage.** Green represents minimum signal strength of -100dBm, T-Mobile's design criteria for reliable 4G in-building residential voice coverage at 2100 MHz. This signal strength is required for customers to take advantage of T-Mobile's Home Internet services.
- **Marginal Coverage.** Yellow represents minimum signal strength of -115dBm, but less than -100dBm, T-Mobile's design criteria for in-vehicle coverage at 2100 MHz.
- **No Coverage.** Signal strength less than -115dBm is not shown, as it does not meet T-Mobile's design standards for reliable in-building or in-vehicle coverage.
- **T-Mobile's 4G & 5G Online Coverage Map.** The online coverage map approximates anticipated **outdoor coverage** (including 600Mhz 4G LTE) based on a variety of factors, which may include limited or no coverage areas, and does not guarantee service availability; some data-intensive uses may have decreased functionality in low-bandwidth areas, especially indoors or on the exterior edges of the approximated coverage area. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability. Some coverage (e.g., Narrowband IoT, millimeter wave 5G) not depicted.

SEARCH RING METHODOLOGY

T-Mobile's RF engineers used coverage propagation software systems to predict the coverage provided by the proposed new WCF. The software and T-Mobile's RF engineers considered the general factors outlined below, as well as more project-specific factors such as the type of antenna, antenna tilt, etc. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability.

- **Coverage.** The antenna site must be located in an area where the radio frequency broadcasts will provide adequate coverage within the targeted service area. The RF engineer must take into consideration the coverage objectives for the site as well as the terrain in and around the area to be covered. Because radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, it is generally best to place an antenna site near the center of the desired coverage area. However, in certain cases, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, *e.g.,* buildings or sources of electrical interference.
- **Clutter.** T-Mobile's WCFs must "clear the clutter"—the WCF site must be installed above or close to RF obstructions (the "clutter") to enable the RF signals to extend beyond and clear the clutter. T-Mobile radio frequencies do not penetrate mountains, hills, rocks, or metal, and are diminished by trees, brick and wood walls, and other structures. Accordingly, T-Mobile's antennas must be installed above or close to the "clutter" to provide high quality communications services in the desired coverage areas. Additionally, if the local code requires us to accommodate additional carriers on the support structure, the structure must be even taller to also allow the other carriers' antennas to clear the clutter.
- **Call Handoff.** The WCF site must be in an area where the radio broadcasts from the site will allow seamless "call handoff" with adjacent WCF sites. Call handoff is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlap for a sufficient distance and/or period of time to support the mechanism of the call handoff.

SEARCH RING METHODOLOGY (CONT.)

- **Quality of Service.** Users of wireless communications services want to use their services where they live, work, commute and play, including when they are indoors. T-Mobile's coverage objectives include the ability to provide indoor coverage in areas where there are residences, businesses and indoor recreational facilities.
- **Radio Frequencies Used by System.** The designs of wireless communications systems vary greatly based upon the radio frequencies that are used by the carrier. If the carrier uses radio frequencies in the 600 MHz to 850 MHz range, the radio signals will travel farther and will penetrate buildings better than the radio frequencies in the 2100 MHz band. As a result, wireless communications systems that use lower radio frequencies will need fewer sites than wireless communications systems that use higher radio frequencies.
- **Land Use Classifications.** T-Mobile's ability to construct a WCF site on any particular property is affected by state and local regulations, including zoning and comprehensive plan classifications, goals, and policies. T-Mobile's search rings take these laws and regulations into consideration.

CONFIDENTIALITY NOTICE

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ATTACHMENT "C"

CEQA RESOLUTIONS CUP 25-0004

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0003 AND APPROVING/DENYING THE ADOPTION OF THE "MITIGATED NEGATIVE DECLARATION" (INITIAL STUDY #24-0039) FOR CONDITIONAL USE PERMIT #25-0004 AND VARIANCE #25-0001.

WHEREAS, on July 11, 2025, a Public Notice was mailed to the surrounding property owners advising them of the Environmental Evaluation Committee hearing scheduled for July 24, 2025; and,

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 1, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

WHEREAS, the Board of Supervisors of the County of Imperial has been designated with the responsibility of adoptions and certifications; and

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

The Board of Supervisors has reviewed the attached Appeal and Mitigated Negative Declaration (MND) prior to approval of Conditional Use Permit #25-0004 and Variance #25-0001. The Board of Supervisors finds and determines that the Mitigated Negative Declaration is adequate and prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA), which analyzes the project's environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein are true, correct, and valid; and,
2. That the Board of Supervisors has reviewed the attached Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001, and considered the information contained in the Mitigated Negative Declaration together with all comments received during the public review period and prior to denying the Conditional Use Permit and Variance; and

3. That the Mitigated Negative Declaration reflects the Board of Supervisors independent judgment and analysis.

NOW, THEREFORE, based on the findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY APPEAL #25-0003 AND APPROVE/DENY THE ADOPTION** of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001.

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

PEGGY PRICE, Chairwoman

Imperial County Board of Supervisors

ATTEST: _____

CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

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ATTACHMENT "D"

BOARD RESOLUTIONS CUP 25-0004

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0003 AND APPROVING/DENYING CONDITIONAL USE PERMIT #25-0004 AND CONDITIONS OF APPROVAL FOR VERTICAL BRIDGE TOWER BY VB BTS II, LLC.

WHEREAS, Vertical Bridge (VB BTS II, LLC), has submitted an application for Conditional Use Permit #25-0004 for a proposed 80-foot monopole telecommunication tower including a 4-foot lightning rod and Variance #25-0001 to exceed the height limitation in an area zoned Light Agriculture with Urban Overlay (A-1-U) by 20 feet; and,

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

WHEREAS, the Board of Supervisors of the County of Imperial has been delegated with the responsibility of approvals and certifications; and,

WHEREAS, public notice of said application has been given, and the Board of Supervisors has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on May 5, 2026; and,

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

SECTION 1. The Board of Supervisors of the County of Imperial has considered Appeal #25-0003 and the proposed Conditional Use Permit #25-0004 and Variance #25-0001 prior to denial. The Board of Supervisors of the County of Imperial finds and determines that Conditional Use Permit is consistent with the Imperial County Land Use Ordinance, and it is adequate and prepared with the requirements of the Imperial County General Plan and the California Environmental Quality Act (CEQA), which analyzes environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning law and the County of Imperial regulations, the following findings for denying Conditional Use Permit #25-0004 have been made as follows:

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

The General Plan designates the subject site under "Urban" and as A-1-U "Light Agriculture with an Urban Overlay" per Imperial County Land Use Ordinance, Zone Map # 4. The project is found consistent with the goals and policies of the Imperial County General Plan Land Use Element and therefore, consistent with the County's General Plan. It is determined to be consistent with Division

24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, according to the information provided by the applicant, the tower will be covering an unserved area with only marginal coverage.

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

The purpose of the project is for the construction of a 80-foot monopole telecommunications tower including a 4-foot lightning rod. The project is zoned A-1-U (Light Agriculture with Urban Overlay). Pursuant to Title 9 Division 5 Section 90508.02; communication towers are a permitted use with the approval of a Conditional Use Permit and, therefore, the proposed use is consistent with the purpose of the A-1-U zoning designation.

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

The proposed communications tower is listed as a use subject to a Conditional Use Permit in Imperial County Land Use Ordinance, Section 90508.02.

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

The Project complies with the minimum requirements of Title 9 by obtaining a CUP & Variance pursuant to Title 9, Division 5, and Section 90508.02. The Conditions of Approval will further ensure that the project complies with all applicable regulations of the County of Imperial and the State of California.

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

The project is designated under Land Use "Urban" by the Imperial County General Plan. The proposed project site's parcel is surrounded by other parcels zoned as A-1-U (Ligh Agriculture with an Urban Overlay), towards North, East and West, and R-1-U (Low Density Residential with an Urban Overlay) towards South. To the North, South and West, there are existing residences, with the nearest residence being located approximately 345 ft away from the project site. To the East, a storage Facility owned by County of Imperial. The proposed tower will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.

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

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

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

The project is a permitted use subject to approval of a Conditional Use Permit #25-0004 & Variance #25-0001 under Land Use Ordinance, Section 92404.01 et. seq. and will not grant a special privilege.

NOW, THEREFORE, based on the above findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY** Appeal #25-0003 and **APPROVE/DENY** Conditional Use Permit #25-0004 and attached Conditions of Approval.

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
PEGGY PRICE, Chairwoman
Imperial County Board of Supervisors

ATTEST: _____
CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

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ATTACHMENT "E"

CUP 25-0004 CONDITIONS OF APPROVAL

Recorded Requested By and
When Recorded Return To:

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

AGREEMENT FOR CONDITIONAL USE PERMIT CUP #25-0004
(Vertical Bridge Tower)
(045-600-017-000)

Conditional Use Permit #25-0004 was approved by the Imperial County ☐ Planning Commission ☐ Board of Supervisors and has the Effective Date of x, x, 2025. This Conditional Use Permit is by and between VB BTS III, LLC (hereinafter referred to as "Permittee"), and the COUNTY OF IMPERIAL, a political subdivision of the State of California, (hereinafter referred to as "COUNTY").

RECITALS

WHEREAS, Permittee is the owner or successor in interest in certain land in Imperial County identified as Assessor's Parcel Number 045-600-017-000 further identified by the following legal description: Lot 65 of the Townsite of Holtville, County of Imperial, State of California, According to Map No. 908, on file in the office of the County Recorder of San Diego County, a copy of said map being on file in the office of the County Recorder of Imperial County, together with the West 40 feet of Olive Avenue, lying South of the South line of Thiesen Road and North of the North line of Underwood Road, as set forth in that certain resolution vacating said street, as recorded June 22, 1925 in Book 79, Page 471 of Official Records. In an unincorporated Area of the County of Imperial, State of California; and,

WHEREAS, VB BTS III, LLC, and/or any subsequent owner(s) would be required to and intend to fully comply with all of the terms and conditions of the project as specified in this Conditional Use Permit (CUP); and,

WHEREAS, Permittee has requested a permit to construct and operate a 80-foot above ground level "AGL" co-locatable monopole telecommunication tower, including therewith the necessary security fencing and equipment; and,

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

WHEREAS, Permittee intends to operate the tower for its own use and allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company, thereby minimizing the number of towers required within the confines of the County; and,

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

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

WHEREAS, County, after reviewing the project, after a noticed public hearing before the Planning Commission, agreed to issue Conditional Use Permit #25-0004, subject to the following conditions:

NOW THEREFORE, the County hereby issues CUP #25-0004 subject to all of the following conditions.

GENERAL CONDITIONS:

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

G1 COSTS:

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

G2 AUDIT OF BILLS:

Permittee shall have the right to have any bill audited for clarification or correction. In the event Permittee requests an audit or an explanation of any bill, it shall be in writing to the Planning and Development Services Department. Permittee shall bring the account current including any amount due under a "disputed" billing statement, before any audit is

performed. If the amount disputed is the result of a Department other than the Planning and Development Services Department the explanation or audit shall be performed by said Department and a report provided to both the Permittee and the Planning and Development Services Dept.

G3 PERMITS/LICENSES:

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

G4 RECORDATION:

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

G5 COMPLIANCE/REVOCATION:

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

G6 PROVISION TO RUN WITH LAND:

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

G7 RIGHT OF ENTRY:

The County reserves the right to enter the premises to make the appropriate inspection(s) and to determine if the condition(s) of this permit are complied with. Access to authorized enforcement agency personnel shall not be denied, by the landowner, the permittee or a subsidiary user. The County will contact the person designated by the Permittee to request access to the facility. The request shall be approved within (72) seventy-two hours after request.

G8 TIME LIMIT:

Unless otherwise specified within the project specific conditions this project shall be limited to a maximum of (10) ten years from the recordation date of the CUP. The Conditional Use Permit may be extended for a single (5) five-year period by the Imperial County Planning & Development Services Director. Any request beyond the (15) fifteen years the permittee shall file a written extension request with the Imperial County Planning and Development Services Department and shall be considered by the Planning Commission. The CUP may be revoked or the extension may not be granted if the project is in violation of any one or all of the conditions or if there is a history of non-compliance with the project conditions.

G9 DEFINITIONS:

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

G10 SPECIFICITY:

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

G11 HEALTH HAZARD:

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

G12 ENCROACHMENT PERMIT:

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

G13 REPORT(S):

Permittee shall file an annual report with the Planning and Development Services Department to show that Permittee is in full compliance with this Conditional Use Permit. The report shall be filed within sixty (60) days from the first day of the Calendar year, and shall include at a minimum, the total number of "users" on the tower, any problems encountered during the previous year, any reported frequency interference complaints, the name & phone number of the responsible person whom to contact, and a checklist to show the status of each condition herein. It shall be the responsibility of the Permittee to provide all reports and to include the information about other users. The County may request information at any time from Permittee or other users if applicable, however it shall be the responsibility of the permittee to assure the County that such information is received.

G14 RESPONSIBLE AGENT:

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

G15 INDEMNIFICATION:

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

G16 CHANGE OF OWNER/OPERATOR:

In the event the ownership of the site or the operation of the site transfers from the current Permittee to a new successor Permittee, the successor Permittee shall be bound by all terms and conditions of this permit as if said successor was the original Permittee. Current Permittee shall inform the County Planning and Development Services Department in writing at least 60 days prior to any such transfer. Failure of a notice of change of ownership or change of operator shall be grounds for the immediate revocation of the CUP. In the event of a change, the new Owner/Operator shall file with the Department, via certified mail, a

letter stating that they are fully aware of all conditions and acknowledge that they will adhere to all. If this permit or any subservient or associated permit requires financial surety, the transfer of this permit shall not be effective until the new Permittee has requisite surety on file. Furthermore, existing surety shall not be released until replacement surety is accepted by County. Failure to provide timely notice of transfer by Permittee shall forfeit current surety.

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

G17 COMPLIANCE WITH ORDINANCE:

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

(TOTAL "G" CONDITIONS are 17)

This space intentionally left blank.

Site Specific Conditions:

S1 PROJECT DESCRIPTION:

This permit authorizes the Permittee to construct, operate, and maintain an 80-foot co-locatable, monopole telecommunication tower and variance to exceed the height limitation in an area zoned Light Agriculture with an Urban Overlay (A-1-U) by 20 feet. The tower height shall not exceed 80 feet above ground level (AGL). The tower shall be constructed to the specifications contained in the application. In this case, the tower shall be an unmanned monopole tower including necessary security fencing and equipment. The tower may be used by multiple users in addition to the Permittee, provided the conditions stated herein are followed.

S2 ACCESS TO SITE:

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

S3 NO TRESPASSING SIGNS:

Permittee shall post the site for "No Trespassing" on each side all along the fence.

S4 HOURS OF OPERATION:

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

S5 ANCILLARY USES & ADDITIONAL LAND USE PERMITS:

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

S6 SUSPENSION OF OPERATIONS:

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

S7 ENFORCEMENT ACTION:

County officials responsible for monitoring and/or enforcing the provisions of this permit shall issue a notice requiring abatement of a violation of its terms within a reasonable time as set by ordinance or County policy. As an example, responsible County officials may issue a citation and/or cease-and-desist order for repeated violation until such violations are abated. Under specific violations, the County may order the facility to cease operation until it can or will be operated in full compliance.
In the event there is enforcement action taken by the County it shall at all times be against the Permittee, even if the violation is caused by another party using the tower. It shall be the responsibility of Permittee to assure that the tower is operated in compliance with all terms and conditions of the CUP.

S8 LIGHT & GLARE:

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

S9 CONFLICTING PERMIT CONDITIONS:

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

S10 MINOR ADMINISTRATIVE MODIFICATION:

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

S11 LATEST CODES GOVERN:

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

S12 VARIANCE:

In conjunction with this CUP a height variance has been processed and issued to allow for the construction of the communication tower to a height not exceed 80 feet above ground level (AGL).

S13 LIGHTING:

All towers shall be lit with aircraft warning lights. At a minimum the tower shall include lights at the top and at the mid-point of the structure. Permittee shall install a white medium intensity strobe beacon (for daylight use only) and a red flashing warning light(for nighttime use only) to warn aircraft in the vicinity. Permittee shall submit evidence of compliance with these requirements within six (6) months from the approval date of this CUP.

The Imperial County will not require back-up power so long as the following measures are in place:

1. Implementation of a Network Operation Control Center (NOCC) as a 24 hour, 365 days a year alert system that informs the tower operator and other pertinent agencies immediately of any problems with the tower and the emergency lighting system (including towers less than 200 feet.);

2. Provide the Imperial County Applicators' notification under the NOCC system and its updates at no cost;

3. Work with Imperial County Air Applicators' on the repair schedule and flight path rerouting;

4. Repair lighting or tower equipment failure within 72 hours, and;

5. Provide written reports to the Imperial County Air Applicators' and the Imperial County Planning & Development Services Department upon completion of tower repairs (to the tower lighting) resulting from NOCC actions and provide yearly summary reports pertaining to NOCC actions.

S14 COMMUNICATION FREQUENCY:

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

S15 FREQUENCY COORDINATION:

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

S16 TOWER EMERGENCY INFORMATION:

Permittee shall file with the Imperial County Planning & Development Services Department a Tower Site Information sheet. The permittee shall update this information yearly.

S17 RESTORATION SURETY:

(a) Upon the expiration of this CUP, Permittee shall restore the site upon which the project is located back to its undeveloped condition. To ensure that such restoration is completed, Permittee shall provide security that is in conformance with the County's Financial Assurance Guideline, is acceptable to the Office of County Counsel, and in an amount not less than $50,000. Said security shall cover Permittee, as well as any co-locators, users, or other subleases located at the site.

(b) The amount of security may be administratively increased by the Planning Department or the Planning Commission, upon a finding that the characteristic of the site warrants additional security. The security must be filed with the County within six (6) months of the approval of this CUP, and/or prior to the issuance of any building or grading permit, whichever comes first.

(c) The security shall remain in effect until the project has been completely removed, and the site has been fully restored to its undeveloped condition. In the event there is a history of noncompliance with the conditions of this CUP, or any other applicable federal, State or local law, regulation, rule, policy or procedure, the minimum amount of required security may be administratively increased by the Planning Department or Planning Commission to $75,000.

S18 IMPERIAL IRRIGATION DISTRICT (IID) [1]:

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

- The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access for to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.
- 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). No foundations or buildings will be allowed within IID's right of way.
- Any new, relocated, modified, or reconstructed IID facilities required for any by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and /or National Environmental Policy Act (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.

S19 AIR POLLUTION CONTROL DISTRICT (APCD) [2]:

- All construction activities must adhere to the Air District's Regulation VIII, which is designed to limit emissions of fugitive dust (PM10) to 20% opacity. Any generator greater than 50 horsepower used for standby-backup purposes must be permitted through the Engineering and Permitting Division of the Air District.
- The applicant shall submit a Construction Notice 10 days prior to commencement of earthmoving.

S20 IMPERIAL COUNTY DEPARTMENT OF PUBLIC WORKS (ICDPW) [3]:

- A comprehensive Drainage and Grading Letter accompanied by exhibit that clearly illustrates the proposed property grading, including existing and proposed contours and elevations. This needs to be prepared by a California Licensed Civil Engineer and is required to provide for property grading and drainage control and prevent damage to adjacent properties.
- Prior the final closing for Planning's Division Building Permit, a Drainage/Grading certification letter along with pictures shall be provided by a Civil Engineer or Surveyor that recommended grading and drainage controls were completed per the accepted drainage and grading letter.
- A Concrete driveway shall be installed from Thiesen Rd excising edge of pavement County Right-of-Way per Dwg. No. 410D-1 & 2 shall be installed (per Section 12.10.020-Street Improvement Requirements of Imperial County Ordinance.
- An Encroachment Permit will be required for installing the driveway, temporary traffic control devices, and any activities with County of Imperial Right-of-Way.

S21 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) [4]:

- Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.
- To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.

(TOTAL "S" CONDITIONS are 21)

---

1. IID comment letter dated May 02, 2025
2. APCD comment letter dated May 13, 2025
3. ICDPW comment letter dated June 11, 2025
4. CDFW comments letter dated August 22, 2025

This space intentionally left blank.

NOW THEREFORE, County hereby issues Conditional Use Permit #25-0004, and Permittee hereby accepts such permit upon the terms and conditions set forth herein:

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

PERMITTEE

_____ _____

Randy Wilson, Date
Vice President Development, Vertical Bridge

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

_____ _____

James Minnick, Director of Date
Planning & Development Services

PERMITTEE NOTARIZATION

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

STATE OF _____

COUNTY OF _____} S.S.

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

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

WITNESS my hand and official seal

Signature_____

_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

Dated_____

COUNTY NOTARIZATION

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

STATE OF CALIFORNIA

COUNTY OF IMPERIAL} S.S.

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

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

WITNESS my hand and official seal

Signature_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

ATTACHMENT "F"

VARIANCE RESOLUTIONS V 25-0001

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0003 AND APPROVING/DENYING VARIANCE #25-0001 FOR A HEIGHT INCREASE FOR VERTICAL BRIDGE TOWER BY VB BTS II, LLC.

WHEREAS, Vertical Bridge (VB BTS III, LLC) has submitted an application for a Variance (#25-0001) requesting an increase (20 feet) of the maximum allowed height in the Light Agriculture "A-1" zone from 60 feet to 80 feet for the proposed monopole wireless telecommunication tower (under Conditional Use Permit #25-0004); and

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 01, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

WHEREAS, public notice of said application has been given, and the Board of Supervisors of the County of Imperial has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on May 5, 2026; and,

WHEREAS, the Board of Supervisors of the County of Imperial has been designated with the responsibility of adoptions and certifications; and,

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

SECTION 1. The Board of Supervisors of the County of Imperial has considered Appeal #25-0003 and Variance #25-0001 prior to denial. The Board of Supervisors of the County of Imperial finds and determines that the Variance is adequate and prepared with the requirements of the Imperial County General Plan and the California Environmental Quality Act (CEQA), which analyzes environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning Law (California Government Code (§65906) and the County of Imperial Land Use Ordinance (§90202.08), the following findings for the denial of Variance #25-0001 have been made:

A. **Are there special circumstances applicable to the property described in the variance application that do not apply generally to the property or class of use in the same zone or vicinity?**

Based on their application, requiring VB BTS III LLC to adhere to the sixty (60) foot communication tower height limit would have a significant negative impact on the communications tower coverage that is necessary in the area. It would result in the communications tower incapability to provide communications coverage in the designated area. T-Mobile's RF engineers have determined that the 76' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives. Granting this variance will not constitute a grant of special privilege that is not generally available to other property in the vicinity and in the same land use zone.

B. **Will the granting of such variance not be materially detrimental to the public welfare or injurious to the property or improvements in such zone or vicinity in which the property is located.**

According to their application the purpose of the proposed tower is to increase the coverage available to the carrier's users. Granting such variance will not be materially detrimental to the public welfare or injurious to the property or vicinity in which the property is located.

C. **Because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, will the strict application of zoning laws deprive the subject property of privileges enjoyed by other properties in the vicinity and under identical zone classifications?**

According to their application the strict adherence to Section 90507.06 of Title 9, Division 5, Light Agriculture (A-1) zone to the sixty (60) foot height limit would deprive and prevent VB BTS III, LLC the ability to provide adequate coverage to the surrounding areas.

D. **Does the granting of such variance adversely affect the comprehensive General Plan?**
Staff have reviewed the proposed communications tower and proposed variance and have determined such to be consistent with the purpose of Division 24 Section 92401.00 within the A-1-U (Light Agriculture with Urban Overlay) Zone, in the Urban designation of the Imperial County General Plan. As allowed through the variance process, the granting of the variance for the 20 feet increase would not adversely affect the Imperial County General Plan.

The proposed project is consistent with the A-1-U (Light Agriculture with Urban Overlay) Zone under an approved Conditional Use Permit (Division 5, Section 90507.02 (jj)). It is determined to be consistent with Division 24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed

telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

NOW, THEREFORE, based on the findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY** Appeal #25-0003 and **APPROVE/DENY** Variance #25-0001.

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

PEGGY PRICE, Chairwoman

Imperial County Board of Supervisors

ATTEST: _____

CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

LB:S:\AllUsers\APN\045\600\017\APP25-0003\UPDATED PROPOSAL\BOS Resolutions\APP25-0003 V25-0001 Variance Resolution.docx

ATTACHMENT "G"

ORIGINAL BOARD PACKAGE FROM JANUARY 27, 2026

INCLUDING PC AND EEC PACKAGES

BOARD AGENDA FACT SHEET

CLERK USE ONLY
BOS ACTION
#

Planning & Development Services Dept.
Department /Agency

March 3rd, 2026
Requested Board Date

1. Request:

Board Approval	**XX**	**Information Only/Presentation**	
Other (specify) _____		**Schedule Hearing Time:**	**11:00 a.m.**

2. Requested Action: *Type requested action below*

Continued from January 27th, 2026 - The Imperial County Planning & Development Services Department respectfully requests that the Board of Supervisors conduct a public hearing to consider Appeal #25-0003 of the October 22, 2025, Planning Commission's decision of denial for the Vertical Bridge Tower project:

1. Consider Approval or Denial of Appeal #25-0003; and,
2. Consider Approval or Denial of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001; and,
3. Consider Approval or Denial of Conditional Use Permit #25-0004 for the proposed wireless communication facility; and,
4. Consider Approval or Denial of Variance #25-0001 for the proposed wireless communication facilities to exceed the 60 feet height limitation by 70 feet.

3. **Cost $** N/A **Source:** N/A

4. **If approval of Contract, reviewed/approved by County Counsel on:** NO

By: *N/A* **Action Request:** N/A
Assigned by County Counsel's Office

1. **If approval of position allocation change, approved by Human Resources on:** N/A
By: N/A

2. **Electronic copy submittal date:** 01/08/2026 **By: Adriana Ceballos, Administrative Secretary**

Department Head/Agency Representative

INSTRUCTIONS: Back-up must be submitted 15 BUSINESS days prior to requested date. (Please Note a Holiday counts as a Business Day.) Back-up submitted must contain an Original and 2 copies. Copies must be submitted to the County Executive Office double sided and three (3) hole punched. Back-up must be submitted in a PDF format to vanessasalcido@co.imperial.ca.us and gracielaalvarez@co.imperial.ca.us

Reviewed By: _____ **Deputy CEO**

Reviewed By: _____ **Deputy CEO**

CEO/CLERK USE ONLY:

DATE STAMP

RECEIVED
FEB 27 2026
County Executive Office

BOARD DATE: _____

Action _____ **Filing** _____

Consent _____ **Presentation** _____

Hearing _____ **CEO Approval** _____

Other (specify) _____

_____ *CEO*

_____ *Date*

S:\AllUsers\APN\045\600\017\APP25-0003\APP25-0003 Board Agenda Fact Sheet.docx

Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

January 27, 2026

TO: Board of Supervisors

FROM: Jim Minnick, Director of Planning & Development Services M/O_____

SUBJECT: APPEAL #25-0003 OF THE OCTOBER 22, 2025, PLANNING COMMISSION'S DECISION FOR THE VERTICAL BRIDGE TOWER PROJECT TO ALLOW FOR THE CONSTRUCTION AND OPERATION OF A WIRELESS COMMUNICATION FACILITY.

Dear Board Members:

REQUESTED ACTION:

The Imperial County Planning & Development Services Department respectfully requests that the Board of Supervisors conduct a public hearing to consider Appeal #25-0003 of the October 22, 2025 Planning Commission's decision of denial for the Vertical Bridge Tower project:

1. Consider Approval or Denial of Appeal #25-0003; and,
2. Consider Approval or Denial of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001; and,
3. Consider Approval or Denial of Conditional Use Permit #25-0004 for the proposed wireless communication facility; and,
4. Consider Approval or Denial of Variance #25-0001 for the proposed wireless communication facilities to exceed the 60 feet height limitation by 70 feet.

BACKGROUND:

The project site is located at 1734 E Underwood Rd, Holtville, CA 92250. The project parcel is identified as 045-600-017-000 and is legally described as Block 65 & W2 of VAC ST ADJ TSTE TR 87 15-15 5.51 AC, Section 26, Township 15 South, Range 15 East of the San Bernardino Base and Meridian (S.B.B.M.). (See Attachment "A" Site Vicinity Map).

The proposed project was presented and heard by the Imperial County Planning Commission on October 22, 2025. The motion to approve the project failed by a vote of 8 to 1, as it did not achieve the required five (5) votes for approval on a nine (9) member commission.

The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation on the A-1 (Light Agriculture) zone by 70 feet.

According to the application" "the proposed facility is designed to house the equipment necessary to fill a significant gap in T-Mobile's 5G and 4G LTE coverage…". The tower will contain T-Mobile equipment (11 (8') antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment). The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future co-locators has been made available on the tower as encouraged under Title 9, Division 24.

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

On June 18, 2025, Conditional Use Permit #25-0004 & Variance #25-0001, for the proposed 130-foot wireless telecommunication facility, was heard by the Imperial County Airport Land Use Commission where it was determined that the proposed project was consistent with the 1996 Airport Land Use Compatibility Plan (ALUC).
On July 24, 2025, the Environmental Evaluation Committee (EEC) determined that Conditional Use Permit (CUP #25-0004) and Variance (V #25-0001) for the construction and operation of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet, for which said variance will allow to exceed the 60-feet height limitation on the A-1 (Light Agriculture) zone by 70 feet, would not result in a significant effect on the environment and recommended a Negative Declaration (ND) to be prepared. The EEC Committee consists of a seven (7) member panel, integrated by the Director of Environmental Health Services, Imperial County Fire Chief, Agricultural Commissioner, Air Pollution Control Officer, Director of the Department of Public Works, Imperial County Sheriff, and the Director of Planning and Development Services.

On July 29, 2025, the Notice of Intent for the Negative Declaration was filed with the Imperial County Clerk-Recorder, posted and circulated for a 35-day comment period from July 29, 2025, to September 1, 2025. Comments received were made part of this package.
On August 22nd a letter from the California Department of Fish and Wildlife (CDFW) was received, which requested the incorporation of mitigation measures (MM BIO-1 and MM BIO-2), as a result, a Mitigation Monitoring and Reporting Program (MMRP) was prepared and incorporated to the project to reduce any potential impact.

On October 22, the project was presented to the Planning Commission for consideration of Conditional Use Permit #25-0004 and Variance #25-0001. After review, the Commission voted to deny the proposed project.
On October 29, the applicant, Vertical Bridge (VB BTS II, LLC), submitted a request to the Imperial County Planning and Development Services Department to appeal the Planning Commission's decision to the Board of Supervisors.

Land Use Analysis:

In accordance with the Imperial County General Plan, the land use designation for the proposed project is identified as Urban and is zoned A-1-U (Light Agriculture with an Urban Overlay), as shown on Zoning Map #4 of the Imperial County Title 9 Land Use Ordinance. Pursuant to Title 9, Division 5, Section 90507.02, Subsection (jj) of the County's Land Use Ordinance, utility and communication facilities is an allowed use within an A-1 zoned parcel, subject to the approval of a Conditional Use Permit (CUP) by the County. Such approval requires compliance with Division 24 (Communication Ordinance), of the Title 9 Land Use Ordinance. Based on these criteria, the proposed project is consistent with the Imperial County General Plan and all applicable land use regulations.

Although the proposed project aligns with the A-1 (Light Agriculture) zoning designation under an approved Conditional Use Permit (Division 5, Section 90507.02(jj)), and while maintaining compliance with Division 24 (Communication Ordinance) of Title 9 (Land Use Ordinance), its design has been determined to be inconsistent with the maximum height limitation set forth in Division 5, Chapter 7, Section 90507.06 (Height Limit). In response, and pursuant to Division 2 (General Provisions), Chapter 2 (Land Use Permits – Variance), the applicant has submitted Variance #25-0001, requesting to exceed the 60-feet height limitation by 70 feet, for a total of 130 feet including a 10-foot lightning rod.

ATTACHMENTS:

Attachment A	Vicinity Map
Attachment B	Appeal Request
Attachment C	CEQA Resolutions CUP 25-0004
Attachment D	Board Resolutions CUP 25-0004
Attachment E	CUP 25-0004 Conditions of Approval
Attachment F	Variance Resolutions V 25-0001
Attachment G	PC & EEC Packages

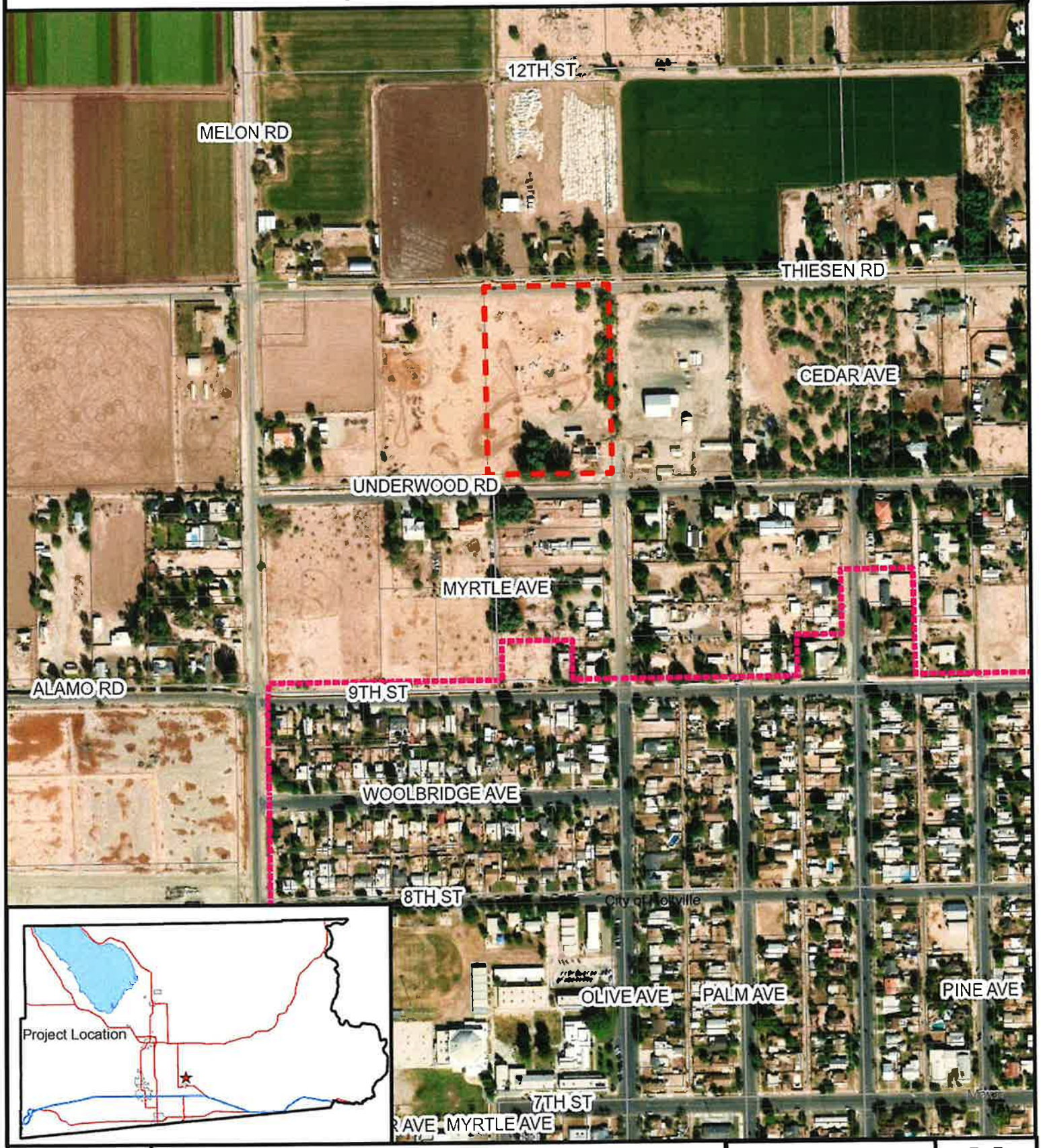
cc: Dr. Kathleen Lang, County Executive Officer
Geoffrey Holbrook, County Counsel
Jim Minnick, Director of ICPDS
Michael Abraham, AICP Assistant Director of ICPDS
Diana Robinson, Planning Division Manager
APP25-0003; APN 045-600-017-000
Files 10.109

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ATTACHMENT "A"

VICINITY MAP

PROJECT LOCATION MAP



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

Project Location
Centerline
City Limit
Parcels

N

ATTACHMENT "B"

APPEAL REQUEST

ASSURANCE
DEVELOPMENT

VB BTS II, LLC Tower
CA-5363

WCF Conditional Use Permit Application
WCF Variance

Appeal to the Board of Supervisors

APN: 045-600-017
1734 E Underwood Rd.
Holtville, CA 92250

Oct. 29, 2025

ASSURANCE DEVELOPMENT

October 29th, 2025

Imperial County Planning & Development Services
Attn: Jim Minnick (Director)
801 Main St.
El Centro, CA. 92243

Re: Appeal of Planning Commission Action
CUP25-0004 / Variance #25-0001, APN 045-600-017-001

Mr. Minnick:

We submit this letter on behalf of Vertical Bridge in regard to the application to install an unoccupied wireless communications facility (Facility) at 1734 E Underwood Road, Holtville, CA; Imperial County Application No. CUP25-0004 and Variance No. 25-0001.

On October 22, 2025, the Imperial County Planning Commission denied Vertical Bridge's application for the Facility. Vertical Bridge hereby requests an appeal from the Planning Commission's decision and identifies within this letter for why the denial decision was not proper and violated the federal Telecommunications Act (TCA) and California law.

This letter addresses how Vertical Bridge has met its requirements to provide a reasonable range of alternative sites showing that the Facility is proposed to be located in the least intrusive means to fill a significant gap in coverage. No available and technologically feasible alternatives to the proposed location have been identified. Vertical Bridge has also provided substantial evidence and information about the significant gap in T-Mobile's wireless network coverage and capacity in the area to be served.

Accordingly, the Conditional Use Permit (CUP) and Variance for the Facility should be approved, and the related CEQA Negative Declaration should also be adopted, as the project complies with federal law (and all applicable County Codes and regulations) to fill a significant gap in T-Mobile's area wireless network coverage and capacity in the least intrusive means.

a. **Name of person(s) filing the Appeal**: Bill Lewis with Assurance Development on behalf VB BTS II, LLC (Vertical Bridge)
b. **Address and phone number of person(s) filing the Appeal;**
   1499 Huntington Dr, Ste 305
   South Pasadena, CA 91030
   626-216-2024
c. **Project/decision being appealed;**
   Planning Commissions' Decision to Deny 1734 E Underwood Road, Holtville, CA; Imperial County Application No. CUP25-0004 and Variance #25-0001.
d. **Reason for filing the Appeal;**
   The denial decision not proper and the Commission did not provide sufficient justification as to how the denial was founded, and did not provide feasible alternatives which would

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support their denial. The Commission referenced existing wireless communication facilities to the south of the proposed tower, stating that there is sufficient space available for the installation of T-Mobile's equipment, as T-Mobile is the anchor carrier for the proposed Facility.

e. **Facts, condition(s), information, error, or other specifics to warrant the Appeal;**
The existing towers, which are to the south of the proposed site, were effectively disqualified by T-Mobile's Radio Frequency (RF) engineers and determined to be infeasible for the location of this facility. Vertical Bridge demonstrated that there are no feasible towers within two (2) miles of the proposed facility. Existing Tower 1 (Imperial Irrigation District, 600 W 6th St) is located approximately 0.6 miles from the proposed location, however, is not constructed to support major wireless carrier equipment. Existing Tower 2 (SBA Towers, 1550 1/2 Zenos Rd) is approximately 1.4 miles southwest from the proposed location. Existing Tower 3 (SBA Towers, 251 Walnut Ave in Holtville) is located approximately 1.5 miles from the proposed location and supports existing T-Mobile infrastructure. T-Mobile RF engineers effectively disqualified these existing towers due to the coverage gap to the north of Holtvile.
Vertical Bridge has provided substantial evidence and information about the significant gap in T-Mobile's wireless network coverage and capacity in the area to be served, of which these existing towers would not serve.

f. **Prior effort(s) made to arrive at acceptable solution if any;**
T-Mobile RF engineers thoroughly assessed the existing towers surrounding the City of Holtville. Vertical Bridge assessed 24 alternative locations for the proposed facility, focusing on the northern area of Holtville. The proposed Facility was determined to be the best location due to property owner willingness to enter into a lease agreement and to meet the coverage objectives determined by T-Mobile.

g. **Action being requested (i.e. deny project, approve project, modify conditions, etc.);**
Approval of project

A. Alternative Site Analysis

Vertical Bridge submitted two detailed alternative site analyses and provided significant hearing testimony at the Planning Commission hearings on the Facility, discussing **twenty-four (24)** other possible locations for the Facility and explaining why each other site was not feasible for various reasons. These detailed analyses satisfy the legal standard under the TCA for locating the Facility. See **Exhibit 1** attached.
No rebuttal of the alternative site analysis that identified other supposedly feasible sites exists.

B. Significant Gap in Coverage

T-Mobile provided coverage maps, explanations from T-Mobile's RF engineer[1], and other data to the County showing a significant gap in its reliable wireless in-building and in-vehicle

[1] On September 19, 2025, Vertical Bridge sent to Imperial County Planning & Development Services detailed materials from T-Mobile's RF engineer that explained and showed the significant gap in T-Mobile's wireless network coverage and capacity in the area. Those September 2025 materials are in addition to other earlier submittals that demonstrate a significant gap in T-Mobile's wireless network coverage and capacity exists in the area to be served by the Facility.

ASSURANCE DEVELOPMENT

coverage and capacity in the area. As the maps showed, the new wireless signal footprint from the Facility will cover hundreds of unserved or underserved homes (having a population count of **over 5,720 occupants**[2]) with reliable in-building and in-vehicle coverage and increased network capacity. Further, the new Facility will provide the same new reliable wireless coverage and capacity for traffic on segments of nearby roads with substantial average daily trips. See **Exhibit 2** attached.

Vertical Bridge and T-Mobile demonstrated the Facility is needed to provide enhanced and improved wireless services in this part of the County to enable improved communications not just for everyday life, business, and other purposes, but also for telehealth services and the critical use of residents and first responders, especially during emergency situations (fires, floods, accidents, policing activities, and ambulance services). A public benefit agreement was entered into with the Imperial Valley Emergency Communications Authority to provide tower space for necessary emergency communications infrastructure. See **Exhibit 3** attached.

No information exists to rebut the evidence and information provided by Vertical Bridge and T-Mobile about the significant gap in area wireless network coverage and capacity.

Based on the information and standards addressed above, Vertical Bridge requests that the Imperial County Board of Supervisors grant Vertical Bridge's appeal, certify the Facility CEQA Negative Declaration, and approve the Facility CUP and Variance.

Sincerely,

Bill Lewis
Assurance Development, Principal

Copies (all via email):

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Bill Lewis (blewis@assurance-group.com)

[2] T-Mobile's coverage analysis incorporates population data for an area based on U.S. Census Bureau information that is overlaid with the new coverage footprint area.

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Exhibit 1

Alternative Site Analysis

Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

Prepared By:
Samantha Herrmann, Assurance Development
T-Mobile/VB BTS III, LLC
Updated: 9/18/2025

Summary

In planning to meet its coverage objective, T-Mobile's Radio Frequency ("RF") engineers performed an RF engineering analysis, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the technical network objectives for the targeted service area. From this analysis, T-Mobile's RF engineers identified a 'search ring' area where a wireless facility may be located to provide effective service in the target coverage area. This facility is proposed to provide coverage to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks. In order to provide the coverage determined by T-Mobile RF Engineers, Applicants are requesting a variance for the total height of the tower at 130' for the reasons explained in Attachment 15, T-Mobile Coverage Objective & Engineering Justification.

There are numerous factors that must be considered when identifying an appropriate location for a new facility. These include T-Mobile's coverage objectives and the existing network infrastructure, adherence to local regulations, the presence of natural and man-made barriers, the availability of suitable sites with owners amenable to entering into an agreement, and the potential impact on aesthetics. Applicants assessed both the determined search area and the area surrounding Holtville to determine feasible candidates for the proposed facility. Twenty-four alterative candidates are presented in this document. Eventually, the analysis focused solely on the search area provided, and the proposed location at 1734 E Underwood Rd, Unit 2, Holtville, CA 92250 in Imperial County is the culmination of evaluating all critical factors and alternatives.

The Imperial County Code § 92401.06 requires that the alternative analysis shall include (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County.

Collocation on Existing Towers

Whenever possible, T-Mobile seeks to construct new sites on existing infrastructure before proceeding with the construction of a new free-standing facility. Before allocating a search area to an infrastructure provider like VB BTS III, LLC, T-Mobile conducts thorough research, ensuring all collocation opportunities are explored and exhausted. The search ring in this case does not contain any existing wireless towers. Therefore, Applicants then analyzes the existing towers within a three-mile radius of the proposed site. Please see Figure C of this document.

There are three existing towers within a two-mile radius of the proposed site. There is limited space available on these towers for co-location, and they do not offer the height required to meet T-Mobile's coverage objectives for the proposed facility. Applicants are limited in co-location opportunities as the proposed site is designed to supplement and provide continuous coverage throughout Holtville. Opportunities are limited due to the existing T-Mobile facility located at coordinates 32.8033, -115.3744. It was determined that collocating on an existing tower was not a feasible alternative, and further analysis is included in the table on page 7 of this document.

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

There are no structures within the search area that can support the required height of 119' to meet the coverage objectives for this tower. The buildings in this area are residential structures at heights ranging from 20'-35'.

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

Figure A: T-Mobile Alternative Candidates Map

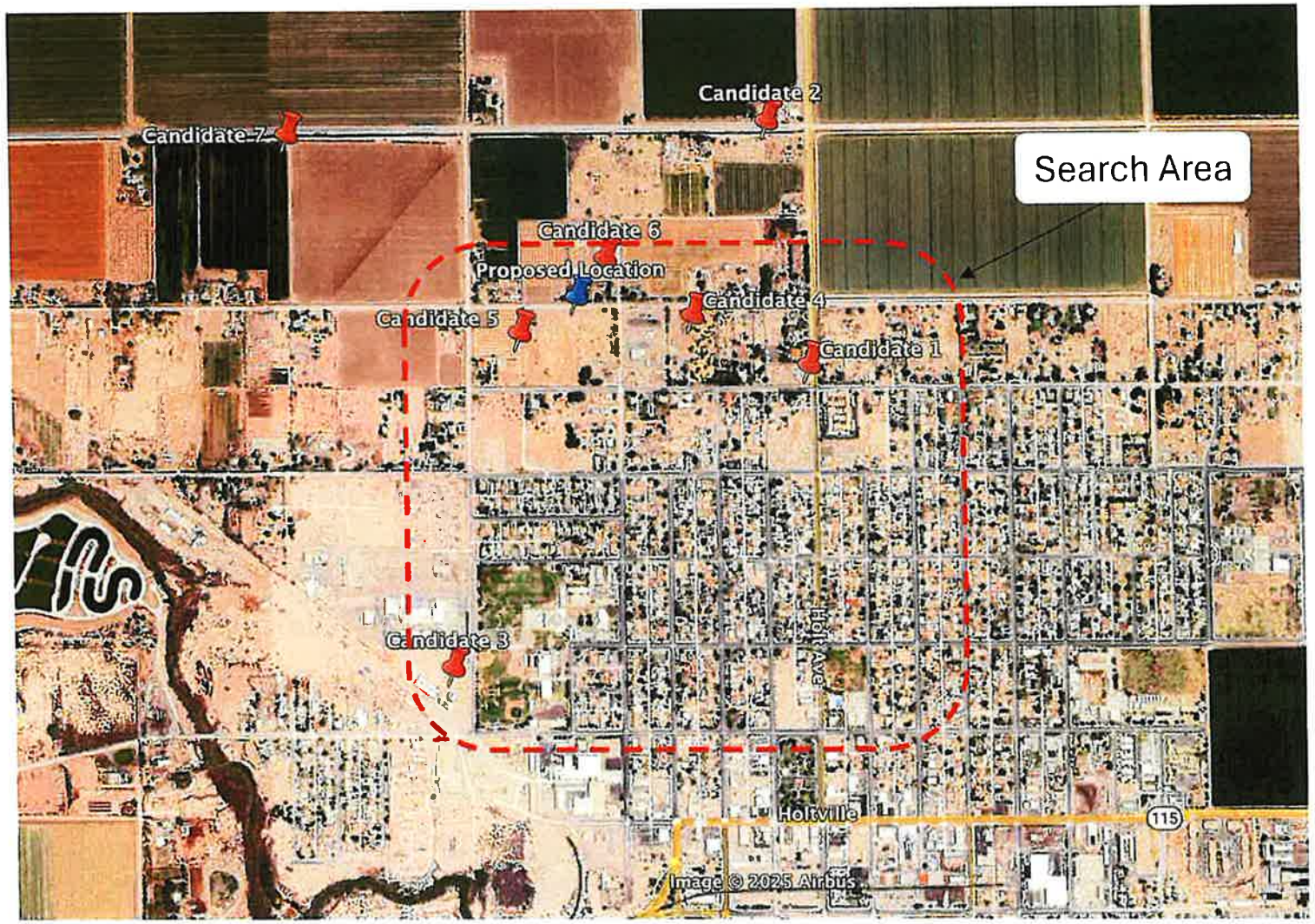


Figure B: Additional Property Owners Contacted (No Response)

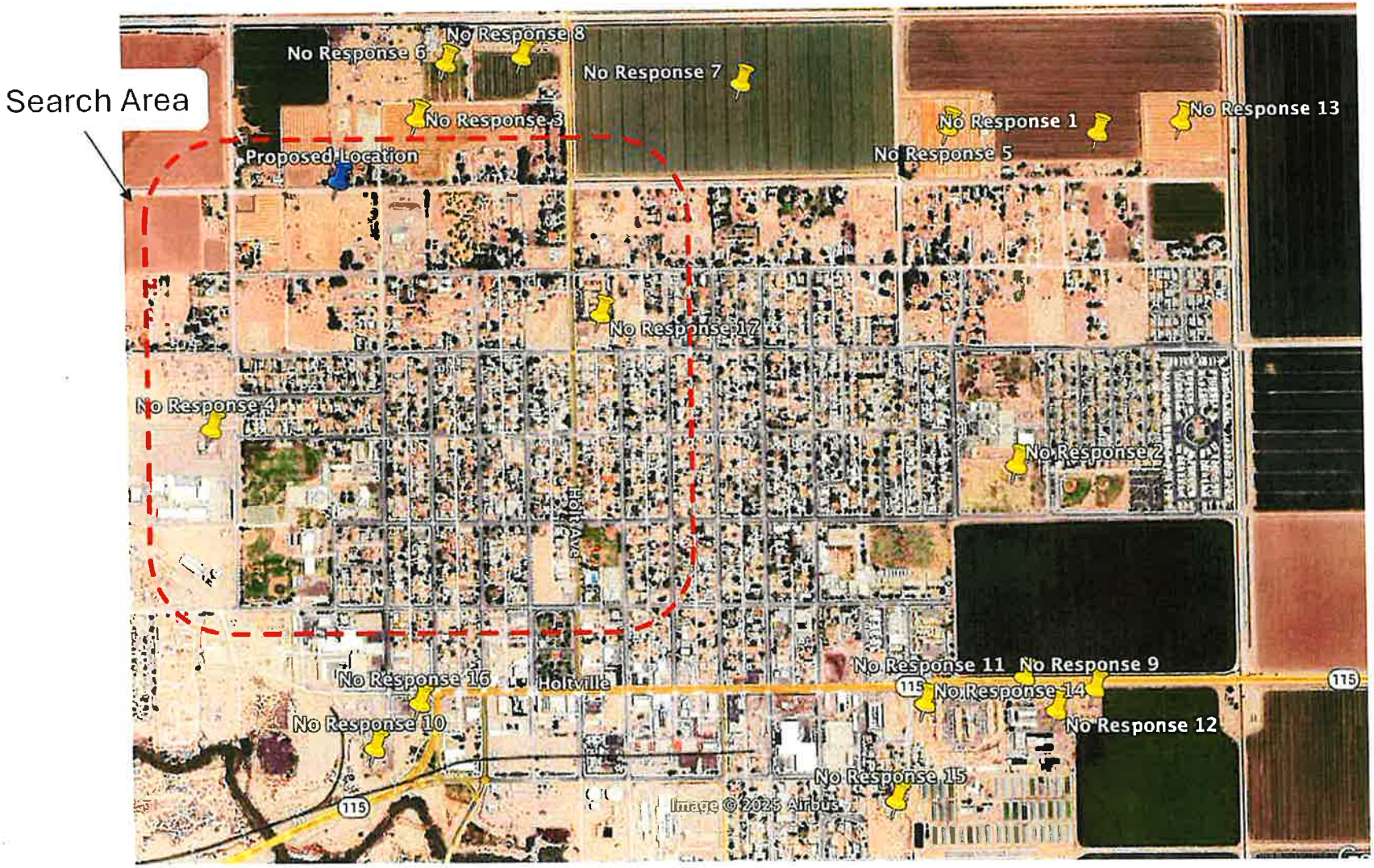


Figure C: Existing Towers within Two Miles of Proposed Facility



Alternative Analysis Summary – Towers within Two Miles of Proposed Facility

	Location	Distance to Proposed Facility	Feasible? (Y/N)	Summary
Collocation on Existing Towers				
1	32.8127, -115.3882	Approx. 0.6 Miles	N	This approx. 80' Microwave tower is owned by the Imperial Irrigation District, Telecommunications Section. The height of the tower would not adequately serve the coverage objectives and could not structurally support the equipment needed for the proposed facility.
2	32.81150833, -115.404900	Approx. 1.3 Miles	N	This approx. 160' lattice tower is located outside of the desired coverage area and the location of T-Mobile's equipment on this tower would not provide sufficient coverage to Holtville. Additionally, the proposed tower aims to provide improved and continuous coverage throughout Holtville by supplementing the existing T-Mobile facility to the south and this tower would not provide meet the coverage objectives to the north.
3	32.8033, -115.3744	Approx. 1.4 Miles	N	This approx. 100' lattice tower supports existing T-Mobile equipment. As the proposed site location is intended to provide improved and continuous coverage throughout Holtville, this tower would not be a feasible opportunity for co-location.

Figure D: Imperial County Zoning Map

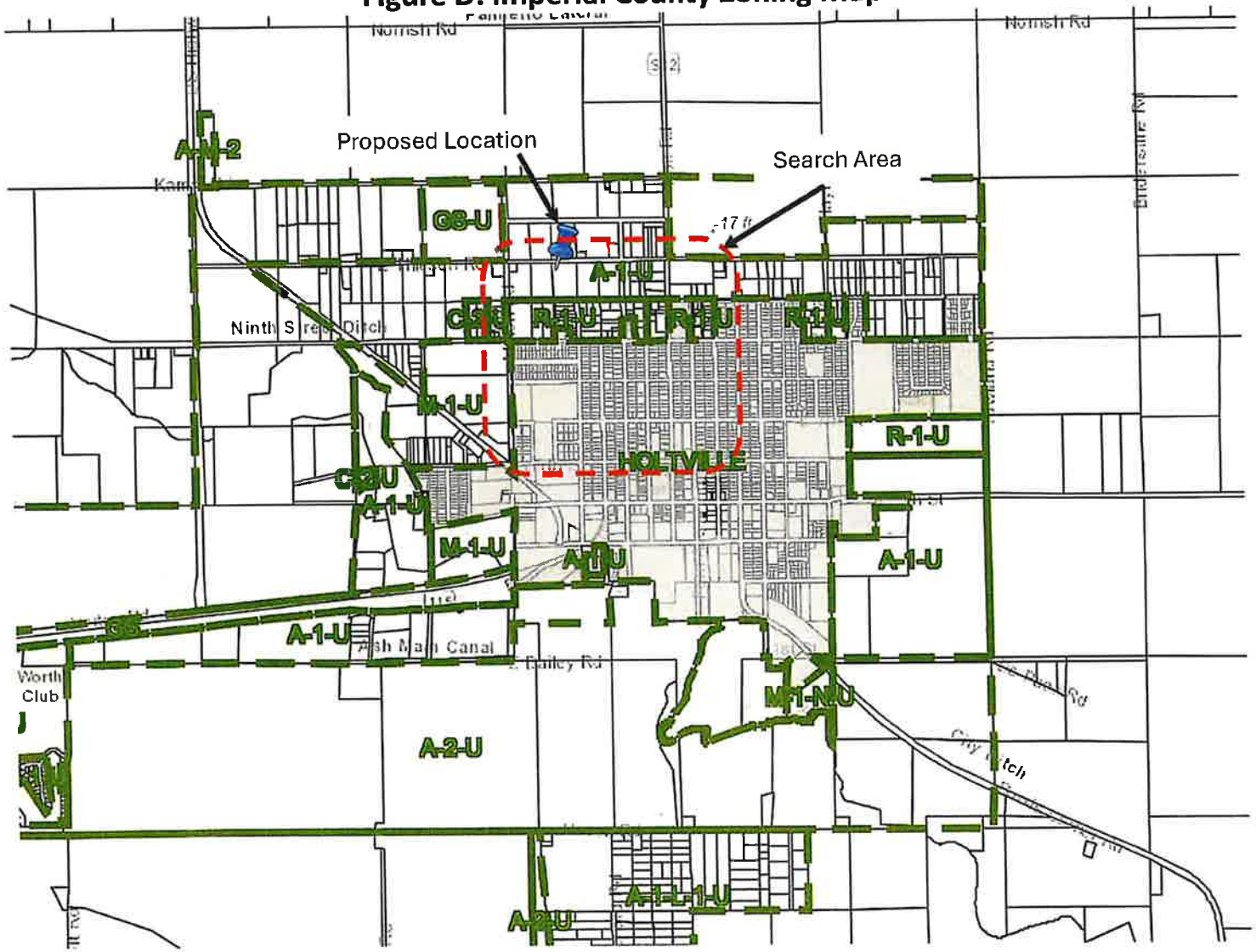
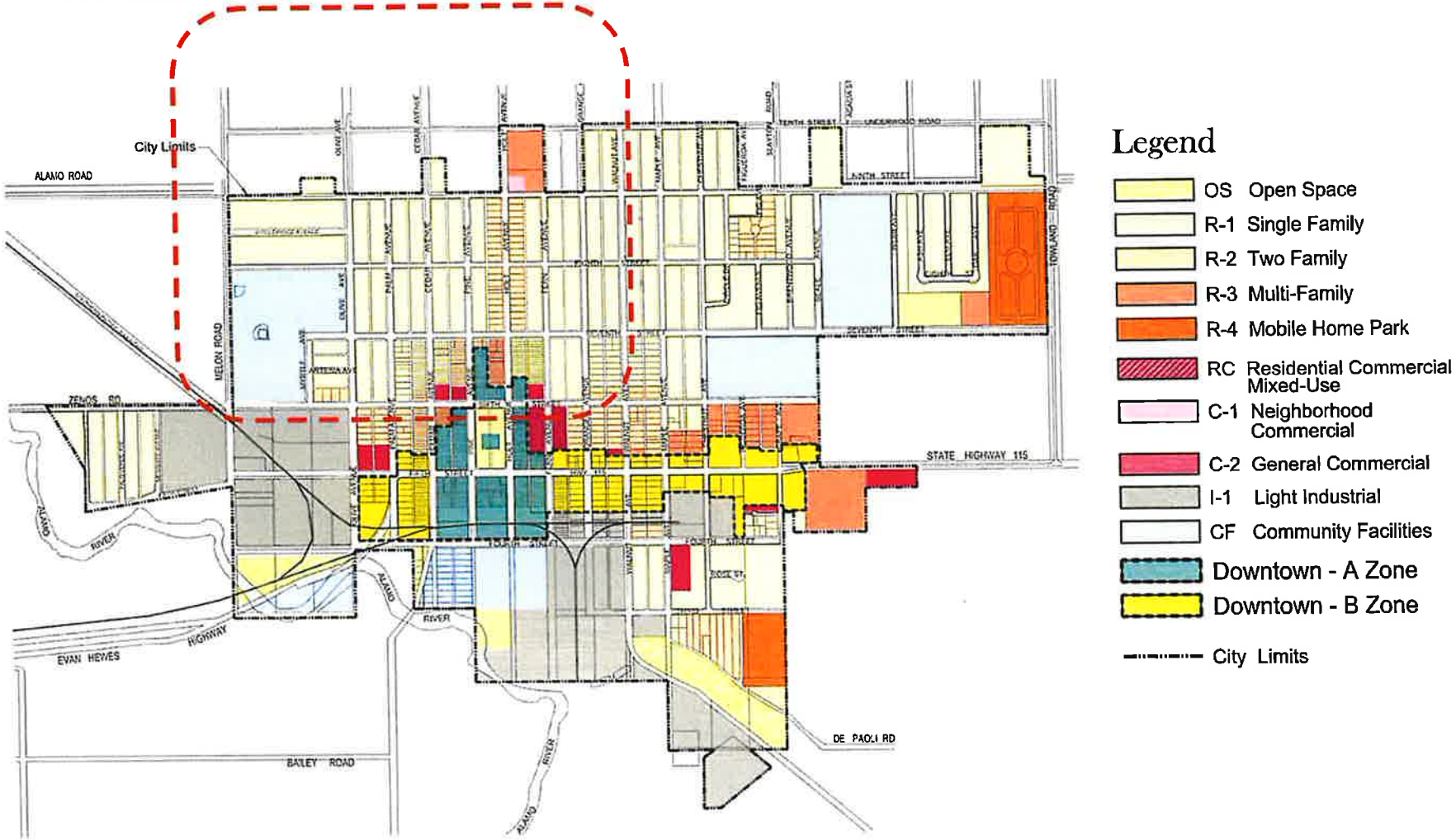


Figure E: City of Holtville Zoning Map

The City of Holtville discourages communications facilities within residential zones. The majority of the designated search area is comprised of R-1, R-2, and CF. The maximum height limit in these zones is 35' without a variance.



Alternative Analysis Summary – T-Mobile Alternative Candidates

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
	APN: 045-600-017 Address: 1734 E Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	The Proposed Location was selected as the best and least intrusive option for the proposed WCF because there were no feasible collocation opportunities, and there were no feasible zoned parcels as demonstrated herein. As Planning determined, wireless communications facilities are permitted within the A-1 zone.
New Tower Location Alternatives					
1	APN: 045-600-015 Address: 2331 Holt Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process due to development of a residence on the property and the Applicants could not move forward with locating a tower on this property.
2	APN: 045-580-012 Address: 2392 Holt Rd.	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
3	APN: 045-570-063 Address: N/A	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and

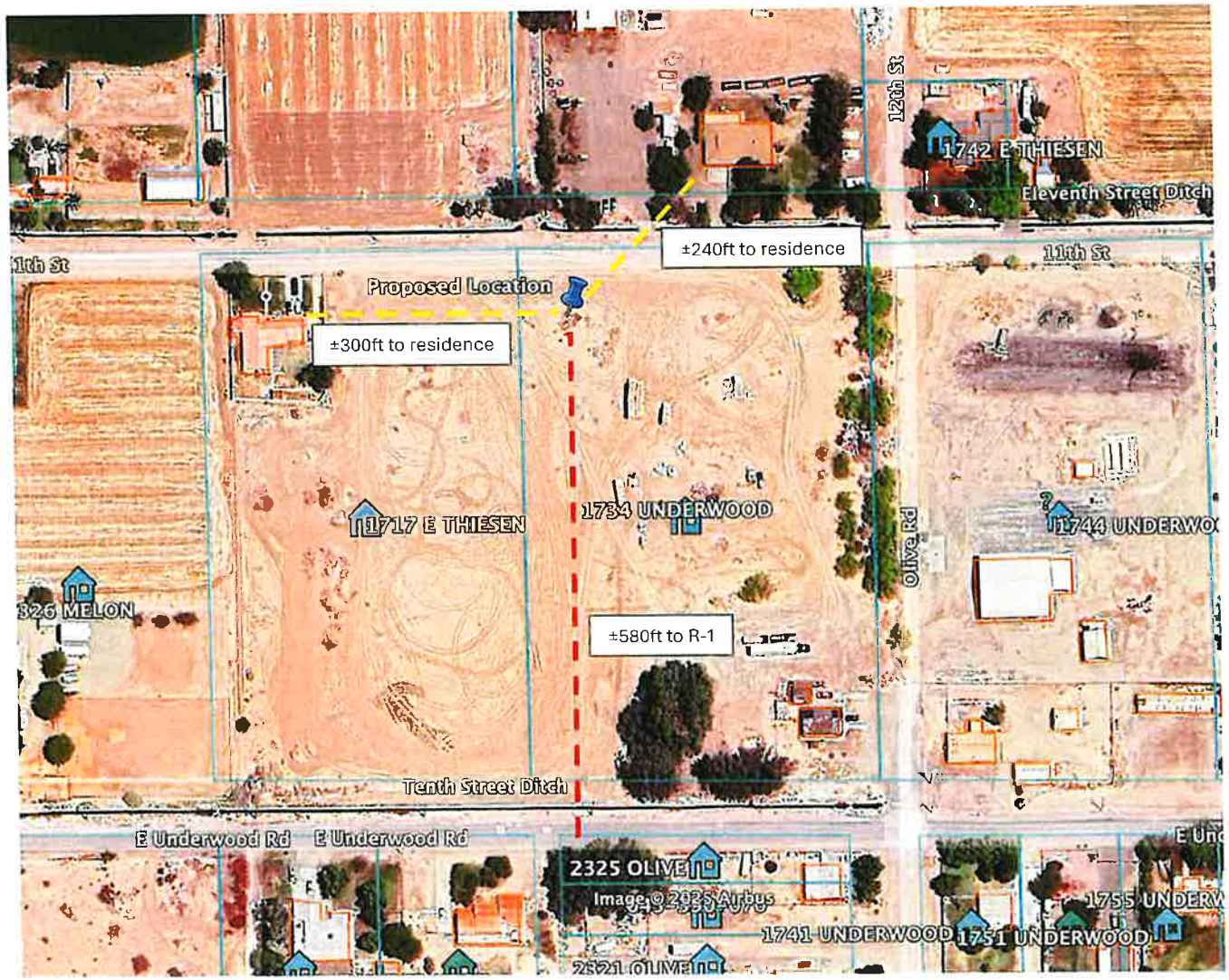
	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
					the Applicants could not move forward with locating a tower on this property.
4	APN: 045-600-004 Address: 1752 Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
5	APN: 045-600-019 Address: 2326 Melon Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
6	APN: 045-590-003 Address: 1736 Thiesen Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
7	APN: 045-080-085 Address: 1642 E Thiesen Ave	Zoning: A-2 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.

Alternative Analysis Summary – Additional Property Owners Contacted (No Response)

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
1	APN: 050-200-005 1966 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
2	APN: 045-621-001 800 BEALE	Zoning: CF Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
3	APN: 045-590-005	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
4	APN: 045-570-088 2255 MELON Rd	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
5	APN: 050-200-004 1904 E THIESEN	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
6	APN: 045-580-007 1749 E KAMM Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
7	APN: 045-040-036	Zoning: A-1 / A-2 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
8	APN: 045-580-009 2377 HOLT Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
9	APN: 045-610-009 1995 E HWY 80 Dr	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
10	APN: 045-242-008 405 OLIVE Rd	Zoning: I-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

11	APN: 045-610-005 1090 E FIFTH	Zoning: C-2 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
12	APN: 045-610-006	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
13	APN: 050-200-002 1990 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
14	APN: 045-610-025 820 E 5TH St	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
15	APN: 045-634-013 710 EA 4TH St	Zoning: R-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
16	APN: 045-281-008	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
17	APN: 045-440-064	Zoning: R-3 / C-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

Figure F: Setback from Residences and Residential Zone (R-1)



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Exhibit 2

T-Mobile Coverage Objectives and Engineering Justification

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COVERAGE OBJECTIVE & ENGINEERING JUSTIFICATION

Holtville-SD07772C

09/16/2025

Prepared by: Toan Vu

T-Mobile Confidential

COVERAGE JUSTIFICATION

OVERVIEW

Vertical Bridge is proposing to build a new structure for the future collocation of multiple carriers at 1734 East Underwood Rd, Holtville, in unincorporated Imperial County. T-Mobile is proposing to collocate its equipment at the 119 ft (antenna tip height) elevation on the new stealth structure.

This proposed facility meets T-Mobile's coverage and capacity objectives by providing reliable 5G and 4G wireless coverage within an area northeast of Holtville and the surrounding area, not adequately served by T-Mobile's network.

Specifically, this proposed new wireless facility is intended to improve both voice & data services to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks.

This coverage and capacity objectives were determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This facility will allow T-Mobile to provide more reliable wireless service with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area.

COVERAGE JUSTIFICATION (CONT.)

FEDERAL LAW The Telecommunications Act of 1996 prohibits a local jurisdiction from taking any action on a wireless siting permit that "prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(i)(II).

- According to the Federal Communications Commission ("FCC") Order adopted in September 2018, a local jurisdiction's action has the effect of prohibiting the provision of wireless services when it "materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment." Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.
    - *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part, City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").
- A local government's denial of an application to install a personal wireless service facility has the effect of prohibiting the provision of personal wireless service if materially inhibits or limits T-Mobile's ability to deploy the facilities, technologies, or services that conform to T-Mobile's network standards and objectives.

COVERAGE JUSTIFICATION (CONT.)

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

- **Significant Gap**. Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City,* 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007*), affirmed in part,* 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco,* 2006 WL 1699580, *10-11 (N.D. Cal. 2006).
- **Least Intrusive Means.** The least intrusive means standard "requires that the provider 'show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

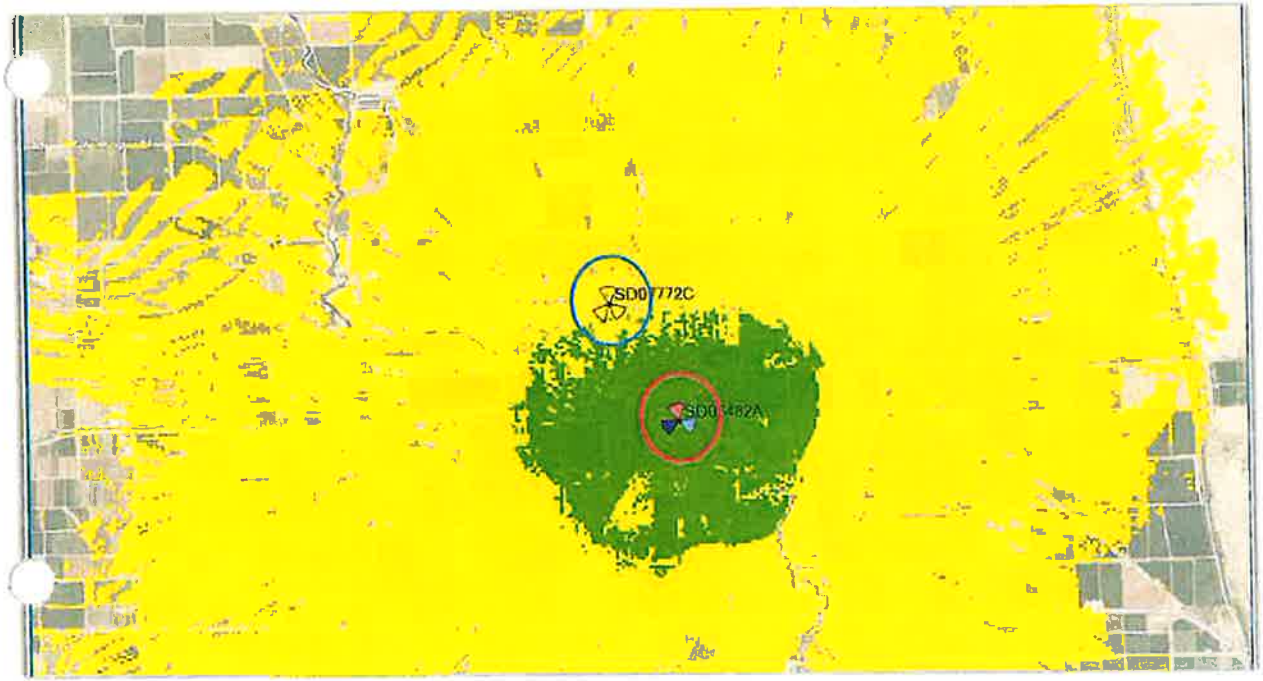
COVERAGE JUSTIFICATION (CONT.)

COVERAGE OBJECTIVE

- **Figure A —Existing T-Mobile Coverage.** Shows existing T-Mobile wireless services in the general area of the proposed new site, which demonstrates the current deficiency in coverage in the targeted service area. The blue circle indicates the location of the proposed new WCF, the magenta circle indicates the location of existing T-Mobile WCF sites; coverage from T-Mobile existing WCF sites is shaded in green. As can be seen, there is a coverage deficiency in all areas not shaded in green. Currently, the target coverage area has minimal to no 5G/4G reliable service.
- **Figure B—Projected New T-Mobile Coverage at 119 ft. (Requested Height).** Identifies the projected coverage from the proposed new WCF with the requested antenna tip height of 119 ft. The proposed antenna tip height is the minimum necessary to help fill the coverage objective relative to nearby complementary wireless facilities & to serve the max possible population. This is also the height where a T-Mobile wireless device can be reliably used to make and receive telephone calls and use data service in the presence of varying signals.
- **Figure C—Comparison of Projected T-Mobile Coverage at 119 ft. (Requested Height) vs. 60 ft (Base Zone Height).** Shows a comparison of the projected coverage from the proposed new WCF if limited to the maximum height permitted in the A-1 zone without a height variance. A facility limited to the base zone height of 60 ft. would result in a [44.7%] reduction in square miles receiving reliable coverage (4.7 miles at 119 ft vs 2.6 miles at 60 ft), and [81.4%] reduction in the new population receiving reliable coverage (5,720 residents at 119 ft vs. 1,062 residents at 60 ft.). T-Mobile has determined that a 119' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives.

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FIGURE A – EXISTING SERVICE WITHOUT THE PROPOSED SITE



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

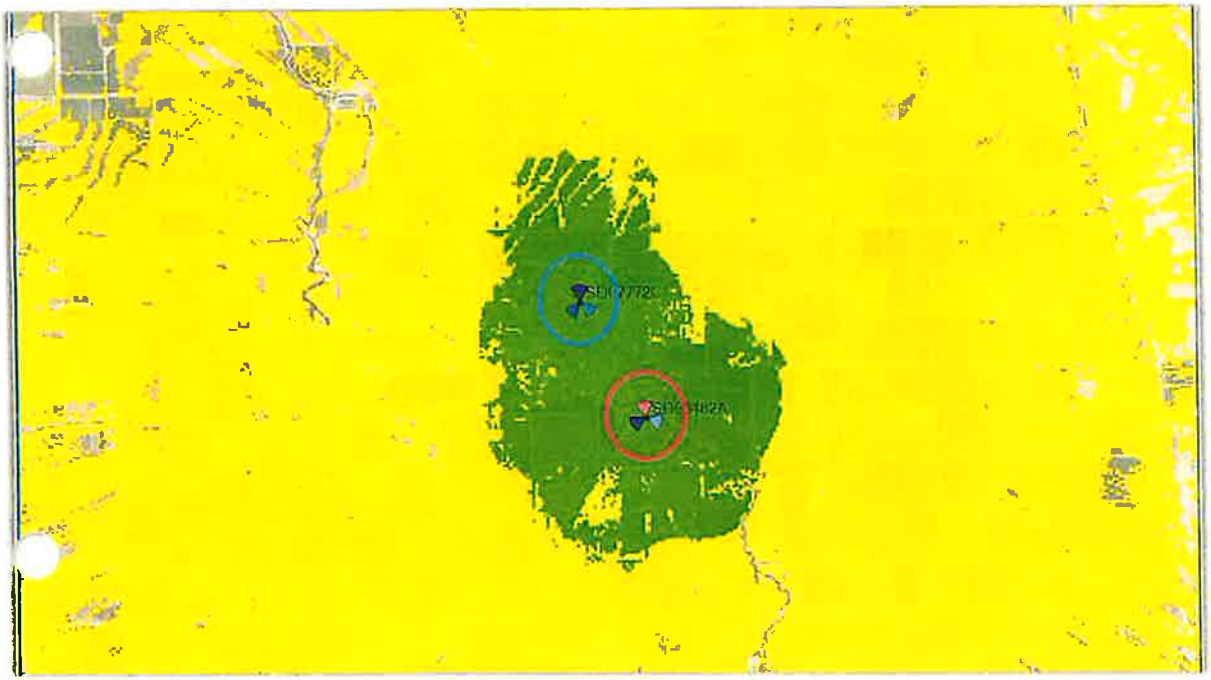
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

Legend

- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

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FIGURE B – PROJECTED SERVICE WITH THE PROPOSED SITE @ 119' TIP HEIGHT AGL



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

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

Legend

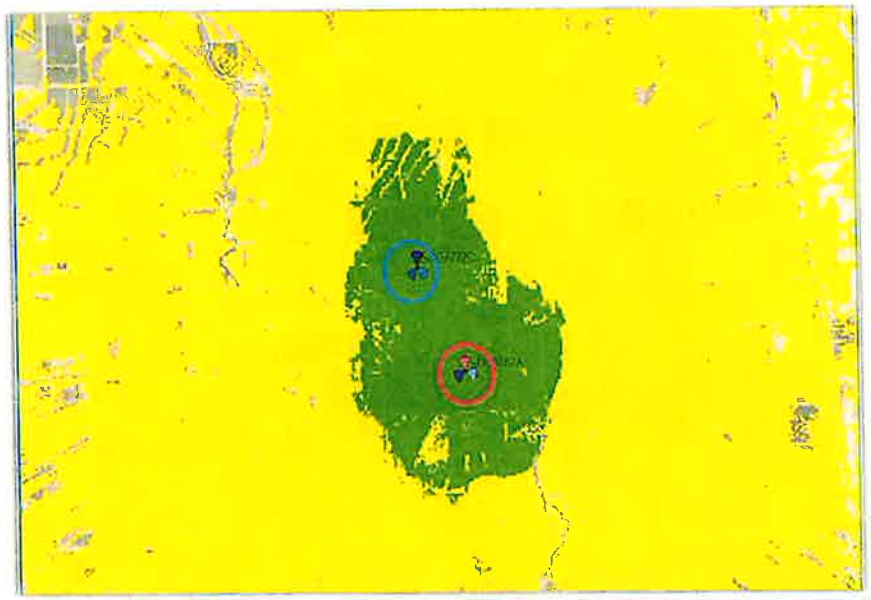
- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

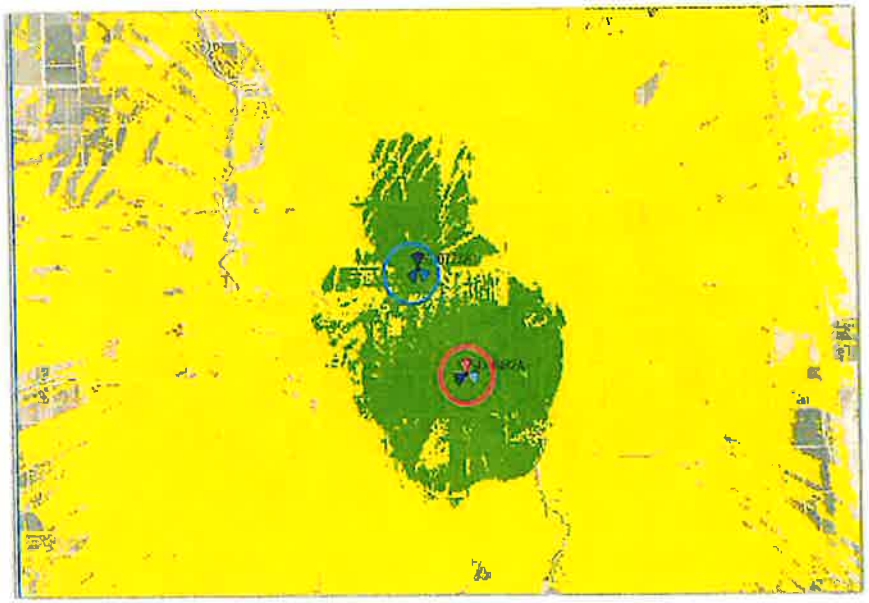
REGIONAL NETWORK ENGINEERING & OPERATIONS
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FIGURE C – COMPARISON OF COVERAGE FROM PROPOSED SITE: 119' VS 60' TIP HEIGHT AGL

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

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





Legend	POPs-Reliable Coverage	Net Change
Existing +New 119' Tower	9,964	5720 Residents
Existing +New 60' Tower	5,306	1062 Residents
% Change		-4658 Residents (-81.4%)

Tower Height	Reliable Coverage-Square miles
119' Tower	4.7
60' Tower	2.6
% Change	-44.68%

REGIONAL NETWORK ENGINEERING & OPERATIONS

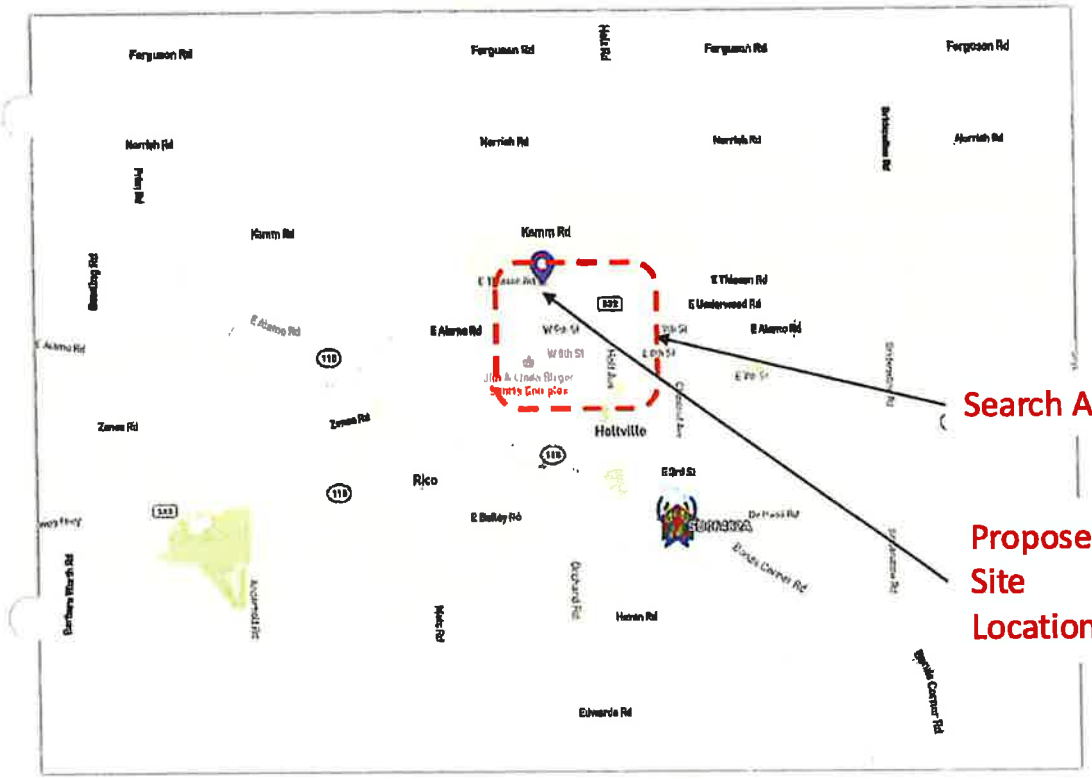
Customer Driven. Locally Focused. Magenta Built.

ALTERNATIVE SITE ANALYSIS

SEARCH RING

- T-Mobile's radio frequency ("RF") engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, T-Mobile's RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.
- **Figure D —Targeted Search Ring** indicates the search ring T-Mobile's RF engineers established for this proposed site. A discussion of the methodology T-Mobile's RF engineers used to identify the search ring is included at the end of this RF Justification document.

FIGURE D – TARGETED SEARCH RING



- Search Ring is to cover the main population areas in city of Holtville
- TMO has only 1 existing site to the south that is not able to cover the needed areas

REGIONAL NETWORK ENGINEERING & OPERATIONS
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COVERAGE METHODOLOGY

T-Mobile's RF engineers use the following signal strength standards to demonstrate the quality of coverage depicted on the maps herein.

- **Reliable Coverage.** Green represents minimum signal strength of -100dBm, T-Mobile's design criteria for reliable 4G in-building residential voice coverage at 2100 MHz. This signal strength is required for customers to take advantage of T-Mobile's Home Internet services.
- **Marginal Coverage.** Yellow represents minimum signal strength of -115dBm, but less than -100dBm, T-Mobile's design criteria for in-vehicle coverage at 2100 MHz.
- **No Coverage.** Signal strength less than -115dBm is not shown, as it does not meet T-Mobile's design standards for reliable in-building or in-vehicle coverage.
- **T-Mobile's 4G & 5G Online Coverage Map.** The online coverage map approximates anticipated **outdoor coverage** (including 600Mhz 4G LTE) based on a variety of factors, which may include limited or no coverage areas, and does not guarantee service availability; some data-intensive uses may have decreased functionality in low-bandwidth areas, especially indoors or on the exterior edges of the approximated coverage area. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability. Some coverage (e.g., Narrowband IoT, millimeter wave 5G) not depicted.

SEARCH RING METHODOLOGY

T-Mobile's RF engineers used coverage propagation software systems to predict the coverage provided by the proposed new WCF. The software and T-Mobile's RF engineers considered the general factors outlined below, as well as more project-specific factors such as the type of antenna, antenna tilt, etc. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability.

- **Coverage.** The antenna site must be located in an area where the radio frequency broadcasts will provide adequate coverage within the targeted service area. The RF engineer must take into consideration the coverage objectives for the site as well as the terrain in and around the area to be covered. Because radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, it is generally best to place an antenna site near the center of the desired coverage area. However, in certain cases, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, *e.g.,* buildings or sources of electrical interference.
- **Clutter.** T-Mobile's WCFs must "clear the clutter"—the WCF site must be installed above or close to RF obstructions (the "clutter") to enable the RF signals to extend beyond and clear the clutter. T-Mobile radio frequencies do not penetrate mountains, hills, rocks, or metal, and are diminished by trees, brick and wood walls, and other structures. Accordingly, T-Mobile's antennas must be installed above or close to the "clutter" to provide high quality communications services in the desired coverage areas. Additionally, if the local code requires us to accommodate additional carriers on the support structure, the structure must be even taller to also allow the other carriers' antennas to clear the clutter.
- **Call Handoff.** The WCF site must be in an area where the radio broadcasts from the site will allow seamless "call handoff" with adjacent WCF sites. Call handoff is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlap for a sufficient distance and/or period of time to support the mechanism of the call handoff.

SEARCH RING METHODOLOGY (CONT.)

- **Quality of Service.** Users of wireless communications services want to use their services where they live, work, commute and play, including when they are indoors. T-Mobile's coverage objectives include the ability to provide indoor coverage in areas where there are residences, businesses and indoor recreational facilities.
- **Radio Frequencies Used by System.** The designs of wireless communications systems vary greatly based upon the radio frequencies that are used by the carrier. If the carrier uses radio frequencies in the 600 MHz to 850 MHz range, the radio signals will travel farther and will penetrate buildings better than the radio frequencies in the 2100 MHz band. As a result, wireless communications systems that use lower radio frequencies will need fewer sites than wireless communications systems that use higher radio frequencies.
- **Land Use Classifications.** T-Mobile's ability to construct a WCF site on any particular property is affected by state and local regulations, including zoning and comprehensive plan classifications, goals, and policies. T-Mobile's search rings take these laws and regulations into consideration.

CONFIDENTIALITY NOTICE

This document and the information it contains are confidential T-Mobile property, and is not to be reproduced distributed, or shared with any individual or entity not expressly authorized by T-Mobile. T-Mobile designates this document, and all information contained within it, as "Confidential Information" under the terms of any agreement between T-Mobile and the entity for whom this document was prepared and is subject to all limitations on such Confidential Information imposed by any such agreement.

ASSURANCE
DEVELOPMENT

Exhibit 3

IVECA Public Benefit Agreement

Docusign Envelope ID: 289D61D1-7DC6-4C63-9[illegible]C295FDE4763

Vertical Bridge REIT, LLC
22 West Atlantic Avenue, Suite 310
Delray Beach, Florida 33444
+1 (561) 948 - 6367
VerticalBridge.com

Public Benefit
In the interest of the Imperial Valley Emergency Communications Authority (IVECA), the county of Imperial (County), and for public benefits including, but not limited to, health and safety, EMS, fire, and law enforcement services, and the greater good of the residents of the County, a Public Benefit Program is herewith established.

The program, under the direction of IVECA, shall secure from Vertical Bridge (VB BTS III, LLC) or any successor, tower space on a space available basis with an approximate maximum height of sixty-five feet (65') for the purpose of mounting one (1) or multiple communication antennas and infrastructure. Included in the Public Benefit Program are ground space for an equipment shelter, or ground-mounted equipment cabinet(s), miscellaneous infrastructure space, emergency power generator space, and ice bridge space, to be approved through the Vertical Bridge colocation application. Should future space be available above the 65' height, discussion may ensue between IVECA and Vertical Bridge concerning antenna and infrastructure location by IVECA or the County. It is understood that the outcome of said dialogue concerning space above the 65' height may be unfavorable to IVECA. All tower and ground space shall be at no cost to IVECA or the County with all terms of the Public Benefit Program in perpetuity throughout the lease term and lease extensions.

The structure must possess sufficient structural capacity to safely support IVECA's or the County's equipment, as verified by a licensed structural engineer. Vertical Bridge shall not be responsible for any structural modifications, reinforcements, or upgrades required to accommodate IVECA's or the County's equipment.

Any IVECA or County-installed communication antenna(s) must be designed, installed, and operated in a manner that does not interfere with the function, signal quality, or operations of any existing antenna(s) or equipment currently operating at the site.

On information received from Imperial County Planning & Development Services, Public/Local Benefit Programs involving communication sites shall be negotiated with the communication site of interest principals and those seeking the Public/Local Benefit Program. (End)

Kind Regards,
Signed by:
X Patrick Bardone
B3CEEFD4E8B4492...

Patrick Bardone | Vice President Development
Vertical Bridge REIT, LLC
22 West Atlantic Avenue, Suite 310
Delray Beach, FL 33444

ATTACHMENT "C"

CEQA RESOLUTIONS CUP#25-0004

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0003 AND APPROVING/DENYING THE ADOPTION OF THE "MITIGATED NEGATIVE DECLARATION" (INITIAL STUDY #25-0012) FOR CONDITIONAL USE PERMIT #25-0004 AND VARIANCE #25-0001.

WHEREAS, on July 11, 2025, a Public Notice was mailed to the surrounding property owners advising them of the Environmental Evaluation Committee hearing scheduled for July 24, 2025; and,

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 1, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

WHEREAS, the Board of Supervisors of the County of Imperial has been designated with the responsibility of adoptions and certifications; and

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

The Board of Supervisors has reviewed the attached Appeal and Mitigated Negative Declaration (MND) prior to approval of Conditional Use Permit #25-0004 and Variance #25-0001. The Board of Supervisors finds and determines that the Mitigated Negative Declaration is adequate and prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA), which analyzes the project's environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein are true, correct, and valid; and,
2. That the Board of Supervisors has reviewed the attached Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001, and considered the information contained in the Mitigated Negative Declaration together with all comments received during the public review period and prior to denying the Conditional Use Permit and Variance; and

3. That the Mitigated Negative Declaration reflects the Board of Supervisors independent judgment and analysis.

NOW, THEREFORE, based on the findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY APPEAL #24-0005 AND APPROVE/DENY THE ADOPTION** of the Mitigated Negative Declaration for Conditional Use Permit #25-0004 & Variance #25-0001.

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

PEGGY PRICE, Chairwoman

Imperial County Board of Supervisors

ATTEST: _____

CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

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ATTACHMENT "D"

BOARD RESOLUTIONS CUP#25-0004

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0003 AND APPROVING/DENYING CONDITIONAL USE PERMIT #25-0004 AND CONDITIONS OF APPROVAL FOR VERTICAL BRIDGE TOWER BY VB BTS II, LLC.

WHEREAS, Vertical Bridge (VB BTS II, LLC), has submitted an application for Conditional Use Permit #25-0004 and Variance #25-0001 for a proposed 120'-foot monopole telecommunication tower with a 10'-0" lightning rod for a total height of 130'-0" and Variance to exceed the height limitation in an area zoned Light Agriculture with Urban Overlay (A-1-U) by 70 feet; and,

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

WHEREAS, the Board of Supervisors of the County of Imperial has been delegated with the responsibility of approvals and certifications; and,

WHEREAS, public notice of said application has been given, and the Board of Supervisors has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on January 27, 2026; and,

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

SECTION 1. The Board of Supervisors of the County of Imperial has considered Appeal #25-0003 and the proposed Conditional Use Permit #25-0004 and Variance #25-0001 prior to denial. The Board of Supervisors of the County of Imperial finds and determines that Conditional Use Permit is consistent with the Imperial County Land Use Ordinance, and it is adequate and prepared with the requirements of the Imperial County General Plan and the California Environmental Quality Act (CEQA), which analyzes environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning law and the County of Imperial regulations, the following findings for denying Conditional Use Permit #25-0004 have been made as follows:

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

The General Plan designates the subject site under "Urban" and as A-1-U "Light Agriculture with an Urban Overlay" per Imperial County Land Use Ordinance, Zone Map # 4. The project is found consistent with the goals and policies of the Imperial County General Plan Land Use Element and therefore, consistent with the County's General Plan. It is determined to be consistent with Division

24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, according to the information provided by the applicant, the tower will be covering an unserved area with only marginal coverage.

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

The purpose of the project is for the construction of a 120'-foot monopole tower with 10'-0" lightning rod for a total height of 130'-0". The project is zoned A-1-U (Light Agriculture with Urban Overlay). Pursuant to Title 9 Division 5 Section 90508.02; communication towers are a permitted use with the approval of a Conditional Use Permit and, therefore, the proposed use is consistent with the purpose of the A-1-U zoning designation.

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

The proposed communications tower is listed as a use subject to a Conditional Use Permit in Imperial County Land Use Ordinance, Section 90508.02.

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

The Project complies with the minimum requirements of Title 9 by obtaining a CUP & Variance pursuant to Title 9, Division 5, and Section 90508.02. The Conditions of Approval will further ensure that the project complies with all applicable regulations of the County of Imperial and the State of California.

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

The project is designated under Land Use "Urban" by the Imperial County General Plan. The proposed project site's parcel is surrounded by other parcels zoned as A-1-U (Ligh Agriculture with an Urban Overlay), towards North, East and West, and R-1-U (Low Density Residential with an Urban Overlay) towards South. To the North, South and West, there are existing residences, with the nearest residence being located approximately 180ft away from the project site. To the East, a storage Facility owned by County of Imperial. The proposed tower will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.

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

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

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

The project is a permitted use subject to approval of a Conditional Use Permit #25-0004 & Variance #25-0001 under Land Use Ordinance, Section 92404.01 et. seq. and will not grant a special privilege.

NOW, THEREFORE, based on the above findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY** Appeal #25-0003 and **APPROVE/DENY** Conditional Use Permit #25-0004 and attached Conditions of Approval.

AYES:
NOES:
ABSENT:
ABSTAIN:

_____
PEGGY PRICE, Chairwoman
Imperial County Board of Supervisors

ATTEST: _____
CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

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ATTACHMENT "E"

CUP#25-0004 CONDITIONS OF APPROVAL

Recorded Requested By and
When Recorded Return To:

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

AGREEMENT FOR CONDITIONAL USE PERMIT CUP #25-0004
(Vertical Bridge Tower)
(045-600-017-000)

Conditional Use Permit #25-0004 was approved by the Imperial County ☐ Planning Commission ☐ Board of Supervisors and has the Effective Date of x, x, 2025. This Conditional Use Permit is by and between VB BTS III, LLC (hereinafter referred to as "Permittee"), and the COUNTY OF IMPERIAL, a political subdivision of the State of California, (hereinafter referred to as "COUNTY").

RECITALS

WHEREAS, Permittee is the owner or successor in interest in certain land in Imperial County identified as Assessor's Parcel Number 045-600-017-000 further identified by the following legal description: Lot 65 of the Townsite of Holtville, County of Imperial, State of California, According to Map No. 908, on file in the office of the County Recorder of San Diego County, a copy of said map being on file in the office of the County Recorder of Imperial County, together with the West 40 feet of Olive Avenue, lying South of the South line of Thiesen Road and North of the North line of Underwood Road, as set forth in that certain resolution vacating said street, as recorded June 22, 1925 in Book 79, Page 471 of Official Records. In an unincorporated Area of the County of Imperial, State of California; and,

WHEREAS, VB BTS III, LLC, and/or any subsequent owner(s) would be required to and intend to fully comply with all of the terms and conditions of the project as specified in this Conditional Use Permit (CUP); and,

WHEREAS, Permittee has requested a permit to construct and operate a 120-foot above ground level "AGL" co-locatable monopole telecommunication tower with a 10-foot lightning rod for a total of 130 feet, including therewith the necessary security fencing and equipment; and,

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

WHEREAS, Permittee intends to operate the tower for its own use and allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company, thereby minimizing the number of towers required within the confines of the County; and,

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

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

WHEREAS, County, after reviewing the project, after a noticed public hearing before the Planning Commission, agreed to issue Conditional Use Permit #25-0004, subject to the following conditions:

NOW THEREFORE, the County hereby issues CUP #25-0004 subject to all of the following conditions.

GENERAL CONDITIONS:

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

G1 COSTS:

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

G2 AUDIT OF BILLS:

Permittee shall have the right to have any bill audited for clarification or correction. In the event Permittee requests an audit or an explanation of any bill, it shall be in writing to the Planning and Development Services Department. Permittee shall bring the account current including any amount due under a "disputed" billing statement, before any audit is

performed. If the amount disputed is the result of a Department other than the Planning and Development Services Department the explanation or audit shall be performed by said Department and a report provided to both the Permittee and the Planning and Development Services Dept.

G3 PERMITS/LICENSES:

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

G4 RECORDATION:

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

G5 COMPLIANCE/REVOCATION:

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

G6 PROVISION TO RUN WITH LAND:

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

G7 RIGHT OF ENTRY:

The County reserves the right to enter the premises to make the appropriate inspection(s) and to determine if the condition(s) of this permit are complied with. Access to authorized enforcement agency personnel shall not be denied, by the landowner, the permittee or a subsidiary user. The County will contact the person designated by the Permittee to request access to the facility. The request shall be approved within (72) seventy-two hours after request.

G8 TIME LIMIT:

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

G9 DEFINITIONS:

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

G10 SPECIFICITY:

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

G11 HEALTH HAZARD:

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

G12 ENCROACHMENT PERMIT:

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

G13 REPORT(S):

Permittee shall file an annual report with the Planning and Development Services Department to show that Permittee is in full compliance with this Conditional Use Permit. The report shall be filed within sixty (60) days from the first day of the Calendar year, and shall include at a minimum, the total number of "users" on the tower, any problems encountered during the previous year, any reported frequency interference complaints, the name & phone number of the responsible person whom to contact, and a checklist to show the status of each condition herein. It shall be the responsibility of the Permittee to provide all reports and to include the information about other users. The County may request information at any time from Permittee or other users if applicable, however it shall be the responsibility of the permittee to assure the County that such information is received.

G14 RESPONSIBLE AGENT:

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

G15 INDEMNIFICATION:

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

G16 CHANGE OF OWNER/OPERATOR:

In the event the ownership of the site or the operation of the site transfers from the current Permittee to a new successor Permittee, the successor Permittee shall be bound by all terms and conditions of this permit as if said successor was the original Permittee. Current Permittee shall inform the County Planning and Development Services Department in writing at least 60 days prior to any such transfer. Failure of a notice of change of ownership or change of operator shall be grounds for the immediate revocation of the CUP. In the event of a change, the new Owner/Operator shall file with the Department, via certified mail, a letter stating that they are fully aware of all conditions and acknowledge that they will adhere

to all. If this permit or any subservient or associated permit requires financial surety, the transfer of this permit shall not be effective until the new Permittee has requisite surety on file. Furthermore, existing surety shall not be released until replacement surety is accepted by County. Failure to provide timely notice of transfer by Permittee shall forfeit current surety.

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

G17 COMPLIANCE WITH ORDINANCE:

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

(TOTAL "G" CONDITIONS are 17)

This space intentionally left blank.

Site Specific Conditions:

S1 PROJECT DESCRIPTION:

This permit authorizes the Permittee to construct, operate, and maintain a 120-foot co-locatable, monopole telecommunication tower with a 10'-0" lightning rod for a total height of 130'-0" and variance to exceed the height limitation in an area zoned Light Agriculture with an Urban Overlay (A-1-U) by 70 feet. The tower height shall not exceed 130 feet above ground level (AGL). The tower shall be constructed to the specifications contained in the application. In this case, the tower shall be an unmanned monopole tower including necessary security fencing and equipment. The tower may be used by multiple users in addition to the Permittee, provided the conditions stated herein are followed.

S2 ACCESS TO SITE:

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

S3 NO TRESPASSING SIGNS:

Permittee shall post the site for "No Trespassing" on each side all along the fence.

S4 HOURS OF OPERATION:

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

S5 ANCILLARY USES & ADDITIONAL LAND USE PERMITS:

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

S6 SUSPENSION OF OPERATIONS:

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

S7 ENFORCEMENT ACTION:

County officials responsible for monitoring and/or enforcing the provisions of this permit shall issue a notice requiring abatement of a violation of its terms within a reasonable time as set by ordinance or County policy. As an example, responsible County officials may issue a citation and/or cease-and-desist order for repeated violation until such violations are abated. Under specific violations, the County may order the facility to cease operation until it can or will be operated in full compliance.
In the event there is enforcement action taken by the County it shall at all times be against the Permittee, even if the violation is caused by another party using the tower. It shall be the responsibility of Permittee to assure that the tower is operated in compliance with all terms and conditions of the CUP.

S8 LIGHT & GLARE:

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

S9 CONFLICTING PERMIT CONDITIONS:

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

S10 MINOR ADMINISTRATIVE MODIFICATION:

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

S11 LATEST CODES GOVERN:

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

S12 VARIANCE:

In conjunction with this CUP a height variance has been processed and issued to allow for the construction of the communication tower to a height not exceed 130 feet above ground level (AGL).

S13 LIGHTING:

All towers shall be lit with aircraft warning lights. At a minimum the tower shall include lights at the top and at the mid-point of the structure. Permittee shall install a white medium intensity strobe beacon (for daylight use only) and a red flashing warning light(for nighttime use only) to warn aircraft in the vicinity. Permittee shall submit evidence of compliance with these requirements within six (6) months from the approval date of this CUP.

The Imperial County will not require back-up power so long as the following measures are in place:

1. Implementation of a Network Operation Control Center (NOCC) as a 24 hour, 365 days a year alert system that informs the tower operator and other pertinent agencies immediately of any problems with the tower and the emergency lighting system (including towers less than 200 feet.);

2. Provide the Imperial County Applicators' notification under the NOCC system and its updates at no cost;

3. Work with Imperial County Air Applicators' on the repair schedule and flight path rerouting;

4. Repair lighting or tower equipment failure within 72 hours, and;

5. Provide written reports to the Imperial County Air Applicators' and the Imperial County Planning & Development Services Department upon completion of tower repairs (to the tower lighting) resulting from NOCC actions and provide yearly summary reports pertaining to NOCC actions.

S14 COMMUNICATION FREQUENCY:

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

S15 FREQUENCY COORDINATION:

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

S16 TOWER EMERGENCY INFORMATION:

Permittee shall file with the Imperial County Planning & Development Services Department a Tower Site Information sheet. The permittee shall update this information yearly.

S17 RESTORATION SURETY:

(a) Upon the expiration of this CUP, Permittee shall restore the site upon which the project is located back to its undeveloped condition. To ensure that such restoration is completed, Permittee shall provide security that is in conformance with the County's Financial Assurance Guideline, is acceptable to the Office of County Counsel, and in an amount not less than $25,000. Said security shall cover Permittee, as well as any co-locators, users, or other subleases located at the site.

(b) The amount of security may be administratively increased by the Planning Department or the Planning Commission, upon a finding that the characteristic of the site warrants additional security. The security must be filed with the County within six (6) months of the approval of this CUP, and/or prior to the issuance of any building or grading permit, whichever comes first.

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

S18 IMPERIAL IRRIGATION DISTRICT (IID) [1]:

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

- The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access for to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.
- 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). No foundations or buildings will be allowed within IID's right of way.
- Any new, relocated, modified, or reconstructed IID facilities required for any by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and /or National Environmental Policy Act (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.

S19 AIR POLLUTION CONTROL DISTRICT (APCD) [2]:

- All construction activities must adhere to the Air District's Regulation VIII, which is designed to limit emissions of fugitive dust (PM10) to 20% opacity. Any generator greater than 50 horsepower used for standby-backup purposes must be permitted through the Engineering and Permitting Division of the Air District.
- The applicant shall submit a Construction Notice 10 days prior to commencement of earthmoving.

S20 IMPERIAL COUNTY DEPARTMENT OF PUBLIC WORKS (ICDPW) [3]:

- A comprehensive Drainage and Grading Letter accompanied by exhibit that clearly illustrates the proposed property grading, including existing and proposed contours and elevations. This needs to be prepared by a California Licensed Civil Engineer and is required to provide for property grading and drainage control and prevent damage to adjacent properties.
- Prior the final closing for Planning's Division Building Permit, a Drainage/Grading certification letter along with pictures shall be provided by a Civil Engineer or Surveyor that recommended grading and drainage controls were completed per the accepted drainage and grading letter.
- A Concrete driveway shall be installed from Thiesen Rd excising edge of pavement County Right-of-Way per Dwg. No. 410D-1 & 2 shall be installed (per Section 12.10.020-Street Improvement Requirements of Imperial County Ordinance.
- An Encroachment Permit will be required for installing the driveway, temporary traffic control devices, and any activities with County of Imperial Right-of-Way.

S21 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) [4]:

- Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.
- To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.

(TOTAL "S" CONDITIONS are 21)

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1. IID comment letter dated May 02, 2025
2. APCD comment letter dated May 13, 2025
3. ICDPW comment letter dated June 11, 2025
4. CDFW comments letter dated August 22, 2025

This space intentionally left blank.

NOW THEREFORE, County hereby issues Conditional Use Permit #25-0004, and Permittee hereby accepts such permit upon the terms and conditions set forth herein:

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

PERMITTEE

_____ _____

Randy Wilson, Date

Vice President Development, Vertical Bridge

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

_____ _____

James Minnick, Director of Date

Planning & Development Services

PERMITTEE NOTARIZATION

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

STATE OF _____

COUNTY OF _____} S.S.

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

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

WITNESS my hand and official seal

Signature_____

_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

Dated_____

COUNTY NOTARIZATION

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

STATE OF CALIFORNIA

COUNTY OF IMPERIAL} S.S.

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

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

WITNESS my hand and official seal

Signature_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

ATTACHMENT "F"

VARIANCE RESOLUTIONS V#25-0001

RESOLUTION NO.

A RESOLUTION OF THE BOARD OF SUPERVISORS OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING/DENYING APPEAL #25-0004 AND APPROVING/DENYING VARIANCE #25-0001 FOR A HEIGHT INCREASE FOR VERTICAL BRIDGE TOWER BY VB BTS II, LLC.

WHEREAS, Vertical Bridge (VB BTS III, LLC) has submitted an application for a Variance (#25-0001) requesting an increase (70 feet) of the maximum allowed height in the Light Agriculture "A-1" zone from 60 feet to 130 feet for the proposed monopole wireless telecommunication tower (under Conditional Use Permit #25-0004); and

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 01, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

WHEREAS, public notice of said application has been given, and the Board of Supervisors of the County of Imperial has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on January 27, 2026; and,

WHEREAS, the Board of Supervisors of the County of Imperial has been designated with the responsibility of adoptions and certifications; and,

NOW, THEREFORE, the Board of Supervisors of the County of Imperial **DOES HEREBY RESOLVE** as follows:

SECTION 1. The Board of Supervisors of the County of Imperial has considered Appeal #25-0003 and Variance #25-0001 prior to denial. The Board of Supervisors of the County of Imperial finds and determines that the Variance is adequate and prepared with the requirements of the Imperial County General Plan and the California Environmental Quality Act (CEQA), which analyzes environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning Law (California Government Code (§65906) and the County of Imperial Land Use Ordinance (§90202.08), the following findings for the denial of Variance #25-0001 have been made:

A. **Are there special circumstances applicable to the property described in the variance application that do not apply generally to the property or class of use in the same zone or vicinity?**

Based on their application, requiring VB BTS III LLC to adhere to the sixty (60) foot communication tower height limit would have a significant negative impact on the communications tower coverage that is necessary in the area. It would result in the communications tower incapability to provide communications coverage in the designated area. A facility limited to the base zone height of 60 ft. would result in a 44.7% reduction in square miles receiving reliable coverage (4.7 miles at 119 ft vs 2.6 miles at 60 ft), and 81.4% reduction in the new population receiving reliable coverage (5,720 residents at 119 ft vs. 1,062 residents at 60 ft.) T-Mobile's RF engineers have determined that the 119' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives. Granting this variance will not constitute a grant of special privilege that is not generally available to other property in the vicinity and in the same land use zone.

B. **Will the granting of such variance not be materially detrimental to the public welfare or injurious to the property or improvements in such zone or vicinity in which the property is located.**

According to their application the purpose of the proposed tower is to increase the coverage available to the carrier's users. Granting such variance will not be materially detrimental to the public welfare or injurious to the property or vicinity in which the property is located.

C. **Because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, will the strict application of zoning laws deprive the subject property of privileges enjoyed by other properties in the vicinity and under identical zone classifications?**

According to their application the strict adherence to Section 90507.06 of Title 9, Division 5, Light Agriculture (A-1) zone to the sixty (60) foot height limit would deprive and prevent VB BTS III, LLC the ability to provide adequate coverage to the surrounding areas.

D. **Does the granting of such variance adversely affect the comprehensive General Plan?**
Staff have reviewed the proposed communications tower and proposed variance and have determined such to be consistent with the purpose of Division 24 Section 92401.00 within the A-1-U (Light Agriculture with Urban Overlay) Zone, in the Urban designation of the Imperial County General Plan. As allowed through the variance process, the granting of the variance for the 70 feet increase would not adversely affect the Imperial County General Plan.

The proposed project is consistent with the A-1-U (Light Agriculture with Urban Overlay) Zone under an approved Conditional Use Permit (Division 5, Section 90507.02 (jj)). It is determined to be

consistent with Division 24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

NOW, THEREFORE, based on the findings, the Board of Supervisors of the County of Imperial **DOES HEREBY APPROVE/DENY** Appeal #25-0003 and **APPROVE/DENY** Variance #25-0001.

AYES:

NOES:

ABSENT:

ABSTAIN:

_____

PEGGY PRICE, Chairwoman

Imperial County Board of Supervisors

ATTEST: _____

CYNTHIA MEDINA, Clerk of the Board of Supervisors, County of Imperial, State of California

LB:S:\AllUsers\APN\045\600\017\APP25-0003\BOS Resolutions\APP25-0003 V25-0001 Variance Resolution.docx

ATTACHMENT "G"

PC & EEC PACKAGES

PROJECT REPORT

TO: PLANNING COMMISSION **AGENDA DATE** October 22, 2025

FROM: PLANNING AND DEVELOPMENT SERVICES **AGENDA TIME** 9:00 AM/No. 4

Vertical Bridge Tower

PROJECT TYPE: Conditional Use Permit #25-0004 / Variance #25-0001 SUPERVISOR DIST: #5

LOCATION: 1734 Underwood Rd APN: 045-600-017-000

Holtville, CA 92250 PARCEL SIZE: +/-9.59 Acres

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

ZONE (existing A-1-U (Limited/Light Agriculture with an Urban Overlay) ZONE (proposed) N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: 10/22/2025

☐ APRROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 07/24/2025

INITIAL STUDY: #25-0012

☒ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☒ NONE	☐ ATTACHED
AG	☒ NONE	☐ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
SHERIFF	☒ NONE	☐ ATTACHED
OTHER	CDFW, IVECA	

REQUESTED ACTION:

STAFF RECOMMENDS THAT THE PLANNING COMMISSION HOLD A PUBLIC HEARING, HEAR ALL THE PROPONENTS AND OPPONENTS OF THE PROPOSED PROJECT, AND THEN TAKE THE FOLLOWING ACTIONS:

1. **ADOPT THE MITIGATED NEGATIVE DECLARATION BY FINDING THAT THE PROPOSED PROJECT WOULD NOT HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AS RECOMMENDED AT THE ENVIRONMENTAL EVALUATION COMMITTEE (EEC) HEARING ON JULY 24, 2025; AND,**

2. **APPROVE THE ATTACHED RESOLUTION AND SUPPORTING FINDINGS, APPROVING CONDITIONAL USE PERMIT (CUP) #25-0004 SUBJECT TO ALL THE CONDITIONS, AND AUTHORIZE THE PLANNING & DEVELOPMENT SERVICES DIRECTOR TO SIGN THE CUP UPON RECEIPT FROM THE PERMITTEE; AND,**

3. **APPROVE THE ATTACHED RESOLUTION AND SUPPORTING FINDINGS FOR VARIANCE #25-0001.**

STAFF REPORT
Planning Commission
October 22, 2025

Project Name: Vertical Bridge Tower
Conditional Use Permit #25-0004
Variance #25-0001

Applicant/Owner: VB BTS III, LLC
750 Park of Commerce Dr. Suite 200,
Boca Raton, FL 33487

Project Location:

The project site is located at 1734 E Underwood Rd, Holtville, CA 92250. The project parcel is identified as 045-600-017-000 and is legally described as Block 65 & W2 of VAC ST ADJ TSTE TR 87 15-15 5.51 AC, Section 26, Township 15 South, Range 15 East of the San Bernardino Base and Meridian (S.B.B.M.).

Project Summary:

The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation on the A-1 (Light Agriculture) zone by 70 feet.

According to the application" "the proposed facility is designed to house the equipment necessary to fill a significant gap in T-Mobile's 5G and 4G LTE coverage…". The tower will contain T-Mobile equipment (11 (8') antennas, 12 RRUs, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment). The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future co-locators has been made available on the tower as encouraged under Title 9, Division 24.

PC ORIGINAL PKG

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

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area.

Project Background:

On June 18, 2025, Conditional Use Permit #25-0004 & Variance #25-0001, for the proposed 130-foot wireless telecommunication facility, was heard by the Imperial County Airport Land Use Commission where it was determined that the proposed project was consistent with the 1996 Airport Land Use Compatibility Plan (ALUC).

Land Use Analysis:

The proposed project is identified as Urban per the General Plan and zoned "A-1-U" (Light Agriculture with an Urban Overlay) per Imperial County Land Use Ordinance (Title 9), Zoning Map 4. The project is consistent with the General Plan as "Utility and Communication Facilities" is an allowed use with an approved Conditional Use Permit per Title 9, Division 5, Chapter 7, Section 90507.02, jj".

Surrounding Land Uses, Zoning and General Plan Designations:

DIRECTION	CURRENT LAND USE	ZONING	GENERAL PLAN
Project Site	Residential	A-1-U	Urban
North	Residential	A-1-U	Urban
South	Residential	R-1-U	Urban
East	Public Works	A-1-U	Urban
West	Residential	A-1-U	Urban

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Environmental Determination:

On July 24, 2025, the Environmental Evaluation Committee (EEC) determined that Conditional Use Permit (CUP #25-0004) and Variance (V #25-0001) for the construction and operation of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet, for which said variance will allow to exceed the 60-feet height limitation on the A-1 (Light Agriculture) zone by 70 feet, would not result in a significant effect on the environment and recommended a Negative Declaration (ND) to be prepared. The EEC Committee consists of a seven (7) member panel, integrated by the Director of Environmental Health Services, Imperial County Fire Chief, Agricultural Commissioner, Air Pollution Control Officer, Director of the Department of Public Works, Imperial County Sheriff, and the Director of Planning and Development Services.

On July 29, 2025, the Notice of Intent for the Negative Declaration was filed with the Imperial County Clerk-Recorder, posted and circulated for a 35-day comment period from July 29, 2025, to September 1, 2025. Comments received were made part of this package.

On August 22nd a letter from the California Department of Fish and Wildlife (CDFW) was received, which requested the incorporation of mitigation measures (MM BIO-1 and MM BIO-2), as a result, a Mitigation Monitoring and Reporting Program (MMRP) was prepared and incorporated to the project to reduce any potential impact.

Staff Recommendation:

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

1. Adopt the Mitigated Negative Declaration by finding that the proposed project would not have a significant effect on the environment as recommended at the Environmental Evaluation Committee (EEC) hearing on July 24, 2025; and,

2. Approve the attached Resolution and supporting findings, approving Conditional Use Permit (CUP) #25-0004 subject to all the conditions, and authorize the Planning & Development Services Director to sign the CUP upon receipt from the Permittee; and,

3. Approve the attached Resolution and Supporting Findings for Variance #25-0001.

PC ORIGINAL PKG

PREPARED BY: Luis Bejarano, Planner II
Planning & Development Services

REVIEWED BY: Michael Abraham, AICP, Assistant Director
Planning & Development Services

APPROVED BY: Jim Minnick, Director
Planning & Development Services

ATTACHMENTS:
A. Vicinity Map
B. Site Plan
C. CEQA Resolutions CUP #25-0004
D. Variance Resolutions V #25-0001
E. Planning Commission Resolutions
F. CUP #24-0024 Conditions of Approval
G. Mitigation Monitoring and Reporting Program
H. EEC Original Package
I. ALUC Package
J. Conditional Use Permit #25-0004 Application & Supporting Documents
K. Comment Letters

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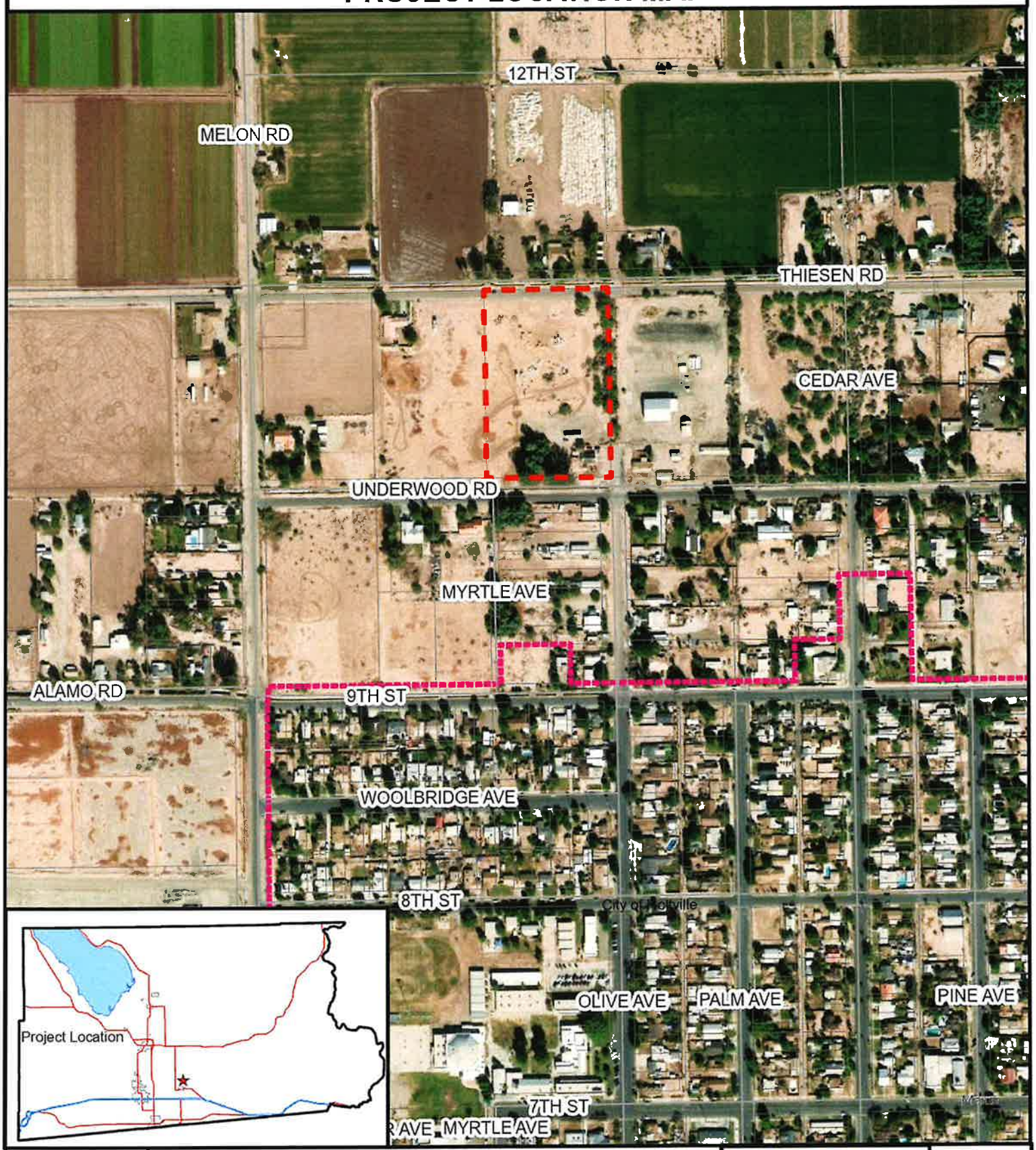
PC ORIGINAL PKG

ATTACHMENT "A"

VICINITY MAP

PC ORIGINAL PKG

PROJECT LOCATION MAP



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

PC ORIGINAL PKG

Project Location
Centerline
City Limit
Parcels

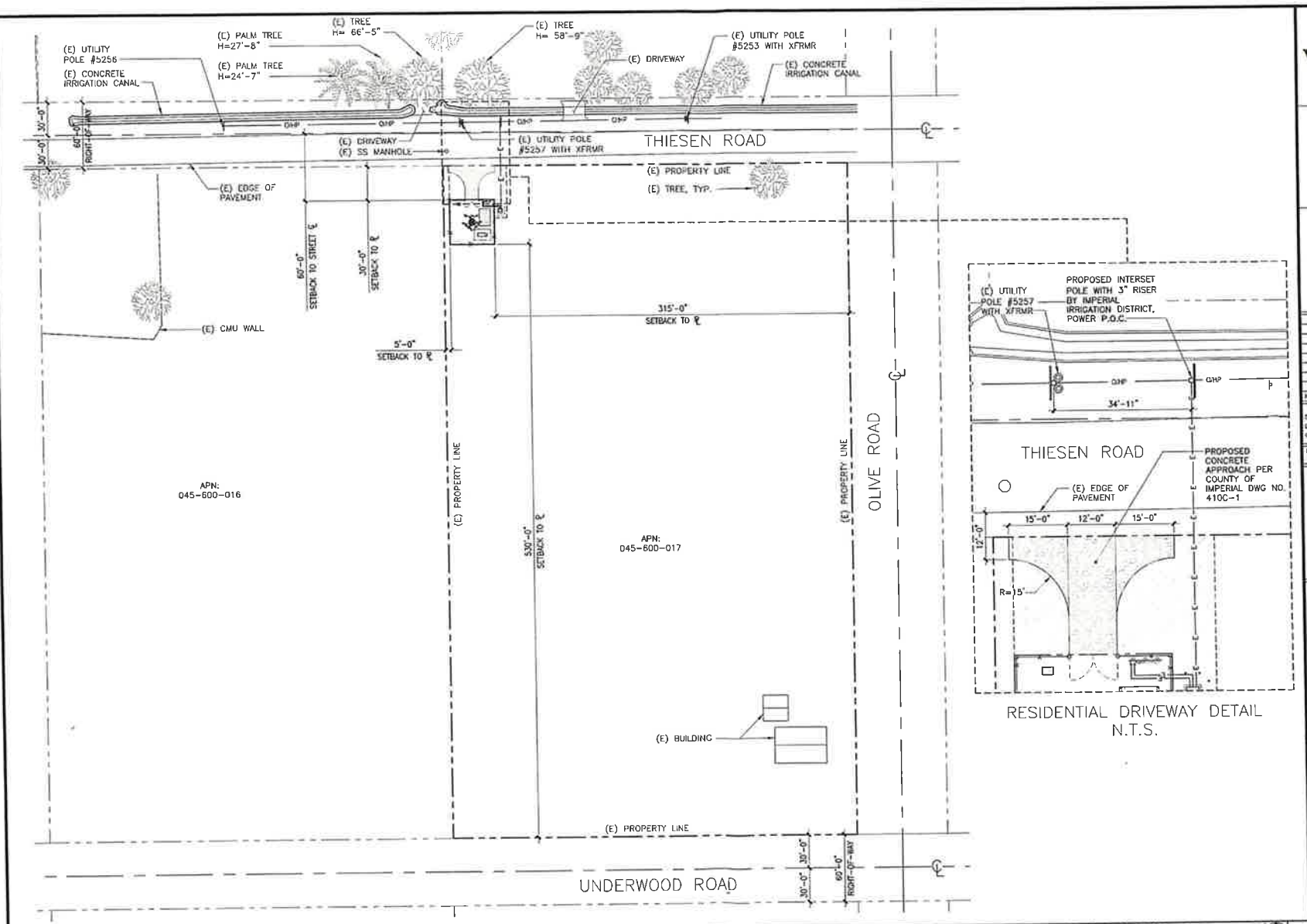
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ATTACHMENT "B"

SITE PLAN

PC ORIGINAL PKG

PC ORIGINAL PKG



SITE PLAN

CLIENT

vertical bridge

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

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1459 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
B	ISSUED FOR ZONING	JR	09/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE

SITE PLAN

DRAWING SCALE: AS NOTED

DATE: 08/16/24

ZD

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

DRAWING NUMBER

A1

ATTACHMENT "C"

CEQA RESOLUTIONS CUP#25-0004

PC ORIGINAL PKG

RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF IMPERIAL, CALIFORNIA, ADOPTING THE "MITIGATED NEGATIVE DECLARATION" (INITIAL STUDY #25-0012) FOR CONDITIONAL USE PERMIT #25-0004 AND VARIANCE #25-0001.

WHEREAS, on July 11, 2025, a Public Notice was mailed to the surrounding property owners advising them of the Environmental Evaluation Committee hearing scheduled for July 24, 2025; and,

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 01, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

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

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

The Planning Commission has reviewed the attached Mitigated Negative Declaration (MND) prior to approval of Conditional Use Permit #25-0004 and Variance #25-0001. The Planning Commission finds and determines that the Mitigated Negative Declaration is adequate and was prepared in accordance with the requirements of the Imperial County General Plan and Land Use Ordinance, and the California Environmental Quality Act (CEQA), which analyzes the project's environmental effects, based upon the following findings and determinations:

1. That the recital set forth herein are true, correct, and valid; and,
2. That the Planning Commission has reviewed the attached Mitigated Negative Declaration (MND) for Conditional Use Permit #25-0004 and Variance #25-0001, and considered the information contained in the Mitigated Negative Declaration together with all comments

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received during the public review period and prior to approving the Conditional Use Permit; and

3. That the Mitigated Negative Declaration reflects the Planning Commission independent judgment and analysis.

NOW, THEREFORE, based on the findings, the Planning Commission **DOES HEREBY ADOPT** the Mitigated Negative Declaration (MND) for Conditional Use Permit #25-0004 And Variance #25-0001.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certify that the preceding Resolution was taken by the Planning Commission at a meeting conducted on **October 22, 2025,** by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

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

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ATTACHMENT "D"

VARIANCE RESOLUTIONS V#25-0001

PC ORIGINAL PKG

RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING VARIANCE #25-0001 FOR A HEIGHT INCREASE FOR VERTICAL BRIDGE TOWER BY VB BTS III, LLC.

WHEREAS, VB BTS III, LLC has submitted an application for a Variance (#25-0001) requesting an increase (70 feet) of the maximum allowed height in the Light Agriculture "A-1" zone from 60 feet to 130 feet for the proposed monopole wireless telecommunication tower (under Conditional Use Permit #25-0004); and

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

WHEREAS, on July 24, 2025, the Environmental Evaluation Committee heard the project and recommended to the Planning Commission of Imperial County to adopt the Negative Declaration for Conditional Use Permit #25-0004 and Variance #25-0001; and

WHEREAS, on July 29, 2025, the Negative Declaration was posted for 35 days from July 29, 2025 to September 01, 2025; and

WHEREAS, on August 22, 2025, a comment letter from the Department of Fish and Wildlife was received, recommending the incorporation of mitigation measures (BIO-1 and BIO-2) to the project, resulting in a Mitigated Negative Declaration through the incorporation of a Mitigation Monitoring and Reporting Program (MMRP); and

WHEREAS, public notice of said application has been given, and the Planning Commission has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on October 22, 2025; and

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

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

SECTION 1. The Planning Commission has considered Variance #25-0001 prior to approval. The Planning Commission finds and determines that the Variance is adequate and prepared in accordance with the requirements of the Imperial County General Plan, Land Use Ordinance and the California Environmental Quality Act (CEQA), which analyses environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning Law (California Government Code (§65906) and the County of Imperial Land Use Ordinance (§90202.08), the following findings for the approval of Variance #25-0001 have been made:

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A. **Are there special circumstances applicable to the property described in the variance application that do not apply generally to the property or class of use in the same zone or vicinity?**

Based on their application, requiring VB BTS III LLC to adhere to the sixty (60) foot communication tower height limit would have a significant negative impact on the communications tower coverage that is necessary in the area. It would result in the communications tower incapability to provide communications coverage in the designated area. A facility limited to the base zone height of 60 ft. would result in a 44.7% reduction in square miles receiving reliable coverage (4.7 miles at 119 ft vs 2.6 miles at 60 ft), and 81.4% reduction in the new population receiving reliable coverage (5,720 residents at 119 ft vs. 1,062 residents at 60 ft.) T-Mobile's RF engineers have determined that the 119' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives. Granting this variance will not constitute a grant of special privilege that is not generally available to other property in the vicinity and in the same land use zone.

B. **Will the granting of such variance not be materially detrimental to the public welfare or injurious to the property or improvements in such zone or vicinity in which the property is located.**

According to their application the purpose of the proposed tower is to increase the coverage available to the carrier's users. Granting such variance will not be materially detrimental to the public welfare or injurious to the property or vicinity in which the property is located.

C. **Because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, will the strict application of zoning laws deprive the subject property of privileges enjoyed by other properties in the vicinity and under identical zone classifications?**

According to their application the strict adherence to Section 90507.06 of Title 9, Division 5, Light Agriculture (A-1) zone to the sixty (60) foot height limit would deprive and prevent VB BTS III, LLC the ability to provide adequate coverage to the surrounding areas.

D. **Does the granting of such variance adversely affect the comprehensive General Plan?**

Staff have reviewed the proposed communications tower and proposed variance and have determined such to be consistent with the purpose of Division 24 Section 92401.00 within the A-1-U (Light Agriculture with Urban Overlay) Zone, in the Urban designation of the Imperial County General Plan. As allowed through the variance process, the granting of the variance for the 70 feet increase would not adversely affect the Imperial County General Plan.

The proposed project is consistent with the A-1-U (Light Agriculture with Urban Overlay) Zone under an approved Conditional Use Permit (Division 5, Section 90507.02 (jj)). It is determined to be consistent with Division 24, Section 92401.00 – Purpose, "…This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing

telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

NOW, THEREFORE, based on the findings, the Imperial County Planning Commission **DOES HEREBY APPROVE** Variance #25-0001.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certify that the preceding Resolution was taken by the Planning Commission at a meeting conducted on **October 22, 2025,** by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

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

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ATTACHMENT "E"

PC RESOLUTIONS

PC ORIGINAL PKG

RESOLUTION NO.

A RESOLUTION OF THE PLANNING COMMISSION OF THE COUNTY OF IMPERIAL, CALIFORNIA, APPROVING CONDITIONAL USE PERMIT #25-0004 AND CONDITIONS OF APPROVAL FOR VERTICAL BRIDGE TOWER BY VB BTS III, LLC.

WHEREAS, VB BTS III, LLC, has submitted an application for Conditional Use Permit #25-0004 and Variance #25-0001 for a proposed 120'-foot monopole telecommunication tower with a 10'-0" lightning rod for a total height of 130'-0" and Variance to exceed the height limitation in an area zoned Light Agriculture with Urban Overlay (A-1-U) by 70 feet; and,

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

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

WHEREAS, public notice of said application has been given, and the Planning Commission has considered evidence presented by the Imperial County Planning & Development Services Department and other interested parties at a public hearing held with respect to this item on October 22, 2025; and,

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

SECTION 1. The Planning Commission has considered the proposed Conditional Use Permit #25-0004 and Variance #25-0001 prior to approval. The Planning Commission finds and determines that the Conditional Use Permit is adequate and prepared in accordance with the requirements of the Imperial County General Plan, Land Use Ordinance and the California Environmental Quality Act (CEQA) which analyses environmental effects, based upon the following findings and determinations.

SECTION 2. That in accordance with State Planning and Zoning law and the County of Imperial regulations, the following findings for approving the Conditional Use Permit #25-0004 and Variance #25-0001 have been made as follows:

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

The General Plan designates the subject site under "Urban" and as A-1-U "Light Agriculture with an Urban Overlay" per Imperial County Land Use Ordinance, Zone Map # 4. The project is found consistent with the goals and policies of the Imperial County General Plan Land Use Element and

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therefore, consistent with the County's General Plan. It is determined to be consistent with Division 24, Section 92401.00 – Purpose, "...This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

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

The purpose of the project is for the construction of a 120'-foot monopole tower with 10'-0" lightning rod for a total height of 130'-0". The project is zoned A-1-U (Light Agriculture with Urban Overlay). Pursuant to Title 9 Division 5 Section 90508.02; communication towers are a permitted use with the approval of a Conditional Use Permit and, therefore, the proposed use is consistent with the purpose of the A-1-U zoning designation.

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

The proposed communications tower is listed as a use subject to a Conditional Use Permit in Imperial County Land Use Ordinance, Section 90508.02.

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

The Project complies with the minimum requirements of Title 9 by obtaining a CUP & Variance pursuant to Title 9, Division 5, and Section 90508.02. The Conditions of Approval will further ensure that the project complies with all applicable regulations of the County of Imperial and the State of California.

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

The project is designated under Land Use "Urban" by the Imperial County General Plan. The proposed project site's parcel is surrounded by other parcels zoned as A-1-U (Ligh Agriculture with an Urban Overlay), towards North, East and West, and R-1-U (Low Density Residential with an Urban Overlay) towards South. To the North, South and West, there are existing residences, with the nearest residence being located approximately 180ft away from the project site. To the East, a storage Facility owned by County of Imperial. The proposed tower will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity.

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

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

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

The project is a permitted use subject to approval of a Conditional Use Permit #25-0004 & Variance #25-0001 under Land Use Ordinance, Section 92404.01 et. seq. and will not grant a special privilege.

NOW, THEREFORE, based on the above findings, the Imperial County Planning Commission **DOES HEREBY APPROVE** Conditional Use Permit #25-0004 & Variance #25-0001 subject to the attached Conditions of Approval.

Rudy Schaffner, Chairperson
Imperial County Planning Commission

I hereby certify that the preceding resolution was taken by the Planning Commission at a meeting conducted on **October 22, 2025** by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

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

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ATTACHMENT "F"

CUP#25-0004 CONDITIONS OF APPROVAL

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Recorded Requested By and
When Recorded Return To:

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

AGREEMENT FOR CONDITIONAL USE PERMIT CUP #25-0004
(Vertical Bridge Tower)
(045-600-017-000)

Conditional Use Permit #25-0004 was approved by the Imperial County ☐ Planning Commission ☐ Board of Supervisors and has the Effective Date of x, x, 2025. This Conditional Use Permit is by and between VB BTS III, LLC (hereinafter referred to as "Permittee"), and the COUNTY OF IMPERIAL, a political subdivision of the State of California, (hereinafter referred to as "COUNTY").

RECITALS

WHEREAS, Permittee is the owner or successor in interest in certain land in Imperial County identified as Assessor's Parcel Number 045-600-017-000 further identified by the following legal description: Lot 65 of the Townsite of Holtville, County of Imperial, State of California, According to Map No. 908, on file in the office of the County Recorder of San Diego County, a copy of said map being on file in the office of the County Recorder of Imperial County, together with the West 40 feet of Olive Avenue, lying South of the South line of Thiesen Road and North of the North line of Underwood Road, as set forth in that certain resolution vacating said street, as recorded June 22, 1925 in Book 79, Page 471 of Official Records. In an unincorporated Area of the County of Imperial, State of California; and,

WHEREAS, VB BTS III, LLC, and/or any subsequent owner(s) would be required to and intend to fully comply with all of the terms and conditions of the project as specified in this Conditional Use Permit (CUP); and,

WHEREAS, Permittee has requested a permit to construct and operate a 120-foot above ground level "AGL" co-locatable monopole telecommunication tower with a 10-foot lightning rod for a total of 130 feet, including therewith the necessary security fencing and equipment; and,

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

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WHEREAS, Permittee intends to operate the tower for its own use and allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company, thereby minimizing the number of towers required within the confines of the County; and,

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

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

WHEREAS, County, after reviewing the project, after a noticed public hearing before the Planning Commission, agreed to issue Conditional Use Permit #25-0004, subject to the following conditions:

NOW THEREFORE, the County hereby issues CUP #25-0004 subject to all of the following conditions.

GENERAL CONDITIONS:

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

G1 COSTS:

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

G2 AUDIT OF BILLS:

Permittee shall have the right to have any bill audited for clarification or correction. In the event Permittee requests an audit or an explanation of any bill, it shall be in writing to the Planning and Development Services Department. Permittee shall bring the account current including any amount due under a "disputed" billing statement, before any audit is

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performed. If the amount disputed is the result of a Department other than the Planning and Development Services Department the explanation or audit shall be performed by said Department and a report provided to both the Permittee and the Planning and Development Services Dept.

G3 PERMITS/LICENSES:

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

G4 RECORDATION:

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

G5 COMPLIANCE/REVOCATION:

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

G6 PROVISION TO RUN WITH LAND:

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

G7 RIGHT OF ENTRY:

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The County reserves the right to enter the premises to make the appropriate inspection(s) and to determine if the condition(s) of this permit are complied with. Access to authorized enforcement agency personnel shall not be denied, by the landowner, the permittee or a subsidiary user. The County will contact the person designated by the Permittee to request access to the facility. The request shall be approved within (72) seventy-two hours after request.

G8 TIME LIMIT:

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

G9 DEFINITIONS:

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

G10 SPECIFICITY:

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

G11 HEALTH HAZARD:

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

G12 ENCROACHMENT PERMIT:

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

G13 REPORT(S):

Permittee shall file an annual report with the Planning and Development Services Department to show that Permittee is in full compliance with this Conditional Use Permit. The report shall be filed within sixty (60) days from the first day of the Calendar year, and shall include at a minimum, the total number of "users" on the tower, any problems encountered during the previous year, any reported frequency interference complaints, the name & phone number of the responsible person whom to contact, and a checklist to show the status of each condition herein. It shall be the responsibility of the Permittee to provide all reports and to include the information about other users. The County may request information at any time from Permittee or other users if applicable, however it shall be the responsibility of the permittee to assure the County that such information is received.

G14 RESPONSIBLE AGENT:

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

G15 INDEMNIFICATION:

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

G16 CHANGE OF OWNER/OPERATOR:

In the event the ownership of the site or the operation of the site transfers from the current Permittee to a new successor Permittee, the successor Permittee shall be bound by all terms and conditions of this permit as if said successor was the original Permittee. Current Permittee shall inform the County Planning and Development Services Department in writing at least 60 days prior to any such transfer. Failure of a notice of change of ownership or change of operator shall be grounds for the immediate revocation of the CUP. In the event of a change, the new Owner/Operator shall file with the Department, via certified mail, a letter stating that they are fully aware of all conditions and acknowledge that they will adhere

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to all. If this permit or any subservient or associated permit requires financial surety, the transfer of this permit shall not be effective until the new Permittee has requisite surety on file. Furthermore, existing surety shall not be released until replacement surety is accepted by County. Failure to provide timely notice of transfer by Permittee shall forfeit current surety.

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

G17 COMPLIANCE WITH ORDINANCE:

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

(TOTAL "G" CONDITIONS are 17)

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Site Specific Conditions:

S1 PROJECT DESCRIPTION:

This permit authorizes the Permittee to construct, operate, and maintain a 120-foot co-locatable, monopole telecommunication tower with a 10'-0" lightning rod for a total height of 130'-0" and variance to exceed the height limitation in an area zoned Light Agriculture with an Urban Overlay (A-1-U) by 70 feet. The tower height shall not exceed 130 feet above ground level (AGL). The tower shall be constructed to the specifications contained in the application. In this case, the tower shall be an unmanned monopole tower including necessary security fencing and equipment. The tower may be used by multiple users in addition to the Permittee, provided the conditions stated herein are followed.

S2 ACCESS TO SITE:

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

S3 NO TRESPASSING SIGNS:

Permittee shall post the site for "No Trespassing" on each side all along the fence.

S4 HOURS OF OPERATION:

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

S5 ANCILLARY USES & ADDITIONAL LAND USE PERMITS:

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

S6 SUSPENSION OF OPERATIONS:

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

S7 ENFORCEMENT ACTION:

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

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

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S8 LIGHT & GLARE:

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

S9 CONFLICTING PERMIT CONDITIONS:

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

S10 MINOR ADMINISTRATIVE MODIFICATION:

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

S11 LATEST CODES GOVERN:

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

S12 VARIANCE:

In conjunction with this CUP a height variance has been processed and issued to allow for the construction of the communication tower to a height not exceed 130 feet above ground level (AGL).

S13 LIGHTING:

All towers shall be lit with aircraft warning lights. At a minimum the tower shall include lights at the top and at the mid-point of the structure. Permittee shall install a white medium intensity strobe beacon (for daylight use only) and a red flashing warning light(for nighttime use only) to warn aircraft in the vicinity. Permittee shall submit evidence of compliance with these requirements within six (6) months from the approval date of this CUP.

The Imperial County will not require back-up power so long as the following measures are in place:

1. Implementation of a Network Operation Control Center (NOCC) as a 24 hour, 365 days a year alert system that informs the tower operator and other pertinent agencies immediately of any problems with the tower and the emergency lighting system (including towers less than 200 feet.);

2. Provide the Imperial County Applicators' notification under the NOCC system and its updates at no cost;

3. Work with Imperial County Air Applicators' on the repair schedule and flight path rerouting;

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4. Repair lighting or tower equipment failure within 72 hours, and;

5. Provide written reports to the Imperial County Air Applicators' and the Imperial County Planning & Development Services Department upon completion of tower repairs (to the tower lighting) resulting from NOCC actions and provide yearly summary reports pertaining to NOCC actions.

S14 COMMUNICATION FREQUENCY:

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

S15 FREQUENCY COORDINATION:

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

S16 TOWER EMERGENCY INFORMATION:

Permittee shall file with the Imperial County Planning & Development Services Department a Tower Site Information sheet. The permittee shall update this information yearly.

S17 RESTORATION SURETY:

(a) Upon the expiration of this CUP, Permittee shall restore the site upon which the project is located back to its undeveloped condition. To ensure that such restoration is completed, Permittee shall provide security that is in conformance with the County's Financial Assurance Guideline, is acceptable to the Office of County Counsel, and in an amount not less than $25,000. Said security shall cover Permittee, as well as any co-locators, users, or other subleases located at the site.

(b) The amount of security may be administratively increased by the Planning Department or the Planning Commission, upon a finding that the characteristic of the site warrants additional security. The security must be filed with the County within six (6) months of the approval of this CUP, and/or prior to the issuance of any building or grading permit, whichever comes first.

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

S18 IMPERIAL IRRIGATION DISTRICT (IID) [1]:

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

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- The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access for to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.
- 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). No foundations or buildings will be allowed within IID's right of way.
- Any new, relocated, modified, or reconstructed IID facilities required for any by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and /or National Environmental Policy Act (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.

S19 AIR POLLUTION CONTROL DISTRICT (APCD) [2]:

- All construction activities must adhere to the Air District's Regulation VIII, which is designed to limit emissions of fugitive dust (PM10) to 20% opacity. Any generator greater than 50 horsepower used for standby-backup purposes must be permitted through the Engineering and Permitting Division of the Air District.
- The applicant shall submit a Construction Notice 10 days prior to commencement of earthmoving.

S20 IMPERIAL COUNTY DEPARTMENT OF PUBLIC WORKS (ICDPW) [3]:

- A comprehensive Drainage and Grading Letter accompanied by exhibit that clearly illustrates the proposed property grading, including existing and proposed contours and elevations. This needs to be prepared by a California Licensed Civil Engineer and is required to provide for property grading and drainage control and prevent damage to adjacent properties.
- Prior the final closing for Planning's Division Building Permit, a Drainage/Grading certification letter along with pictures shall be provided by a Civil Engineer or Surveyor that recommended grading and drainage controls were completed per the accepted drainage and grading letter.
- A Concrete driveway shall be installed from Thiesen Rd excising edge of pavement County Right-of-Way per Dwg. No. 410D-1 & 2 shall be installed (per Section 12.10.020-Street Improvement Requirements of Imperial County Ordinance.
- An Encroachment Permit will be required for installing the driveway, temporary traffic control devices, and any activities with County of Imperial Right-of-Way.

S21 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) [4]:

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- Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.
- To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.

(TOTAL "S" CONDITIONS are 21)

---

1. IID comment letter dated May 02, 2025
2. APCD comment letter dated May 13, 2025
3. ICDPW comment letter dated June 11, 2025
4. CDFW comments letter dated August 22, 2025

This space intentionally left blank.

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NOW THEREFORE, County hereby issues Conditional Use Permit #25-0004, and Permittee hereby accepts such permit upon the terms and conditions set forth herein:

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

PERMITTEE

_____ _____

Randy Wilson, Date
Vice President Development, Vertical Bridge

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

_____ _____

James Minnick, Director of Date
Planning & Development Services

PC ORIGINAL 1-KG

PERMITTEE NOTARIZATION

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

STATE OF _____

COUNTY OF _____} S.S.

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

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

WITNESS my hand and official seal

Signature_____

_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

Dated_____

PC ORIGINAL PKG

COUNTY NOTARIZATION

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

STATE OF CALIFORNIA

COUNTY OF IMPERIAL} S.S.

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

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

WITNESS my hand and official seal

Signature_____

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

Title or Type of Document_____
Number of Pages_____ Date of Document_____
Signer(s) Other Than Named Above_____

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ATTACHMENT "G"

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

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VERTICAL BRIDGE TOWER
CONDITIONAL USE PERMIT (CUP) #25-0004 / INITIAL STUDY (IS) #25-0012 / VARIANCE (V) #25-0001
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

BIOLOGICAL RESOURCES (BIO)			
Mitigation Measure (MM) Description	**Responsible Party**	**Regulatory Agency**	**Implementation Schedule**
MM BIO-1 Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.	Project Proponent	Imperial County, California Department of Fish & Wildlife (CDFW)	Prior to commencing ground or vegetation disturbing activities
MM BIO-2 To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the Staff Report on Burrowing Owl Mitigation (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the Staff Report on Burrowing Owl Mitigation. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.	Project Proponent	Imperial County, California Department of Fish & Wildlife (CDFW)	Prior to commencing ground or vegetation disturbing activities

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ATTACHMENT "H"

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PROJECT REPORT

TO: ENVIRONMENTAL EVALUATION COMMITTEE **AGENDA DATE: July 24, 2025**
FROM: PLANNING & DEVELOPMENT SERVICES **AGENDA TIME: 1:30PM / No. 1**

PROJECT TYPE: Vertical Bridge Tower CUP #25-0004 / V #25-0001 / IS #25-0012 SUPERVISOR DIST # 5

LOCATION: 1734 Underwood Rd APN: 045-600-017-000

Holtville, CA 92250 PARCEL SIZE: 12.10-AC

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

ZONE (existing) A-1-U (Limited/Light Agriculture with an Urban Overlay) ZONE (proposed N/A

GENERAL PLAN FINDINGS ☒ CONSISTENT ☐ INCONSISTENT ☐ MAY BE/FINDINGS

PLANNING COMMISSION DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

PLANNING DIRECTORS DECISION: HEARING DATE: _____

☐ APPROVED ☐ DENIED ☐ OTHER

ENVIROMENTAL EVALUATION COMMITTEE DECISION: HEARING DATE: 07-24-2025

INITIAL STUDY: #25-0012

☐ NEGATIVE DECLARATION ☐ MITIGATED NEG. DECLARATION ☐ EIR

DEPARTMENTAL REPORTS / APPROVALS:

PUBLIC WORKS	☐ NONE	☒ ATTACHED
AG	☐ NONE	☒ ATTACHED
APCD	☐ NONE	☒ ATTACHED
E.H.S.	☒ NONE	☐ ATTACHED
FIRE / OES	☒ NONE	☐ ATTACHED
SHERIFF	☒ NONE	☐ ATTACHED
OTHER	Quechan Indian Tribe, Campo Band of Mission Indians, IID	

REQUESTED ACTION:

(See Attached)

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☑ NEGATIVE DECLARATION
☐ MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Conditional Use Permit #25-0004
Variance #25-0001
Initial Study #25-0012
Vertical Bridge Tower

Prepared By:

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

July 2025

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SECTION 1
INTRODUCTION

A. PURPOSE

This document is a ☐ policy-level, ☒ project level Initial Study for evaluation of potential environmental impacts resulting with the proposed Conditional Use Permit #25-0004 (Refer to Exhibit "A" & "B").

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

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

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

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

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

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

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

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

Pursuant to the County of Imperial Guidelines for Implementing CEQA, depending on the project scope, the County of Imperial Board of Supervisors, Planning Commission and/or Planning Director is designated the Lead Agency, in accordance with Section 15050 of the CEQA Guidelines. The Lead Agency is the public agency which has the

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principal responsibility for approving the necessary environmental clearances and analyses for any project in the County.

C. INTENDED USES OF INITIAL STUDY AND NEGATIVE DECLARATION

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

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

D. CONTENTS OF INITIAL STUDY & NEGATIVE DECLARATION

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

SECTION 1

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

SECTION 2

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

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

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

SECTION 3

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

IV. PERSONS AND ORGANIZATIONS CONSULTED identifies those persons consulted and involved in

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preparation of this Initial Study and Negative Declaration.

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

VI. NEGATIVE DECLARATION – COUNTY OF IMPERIAL

VII. FINDINGS

SECTION 4

VIII. RESPONSE TO COMMENTS (IF ANY)

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

E. SCOPE OF ENVIRONMENTAL ANALYSIS

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

1. **No Impact:** A "No Impact" response is adequately supported if the impact simply does not apply to the proposed applications.

2. **Less Than Significant Impact:** The proposed applications will have the potential to impact the environment. These impacts, however, will be less than significant; no additional analysis is required.

3. **Potentially Significant Unless Mitigation Incorporated:** This applies where incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact".

4. **Potentially Significant Impact:** The proposed applications could have impacts that are considered significant. Additional analyses and possibly an EIR could be required to identify mitigation measures that could reduce these impacts to less than significant levels.

F. POLICY-LEVEL or PROJECT LEVEL ENVIRONMENTAL ANALYSIS

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

G. TIERED DOCUMENTS AND INCORPORATION BY REFERENCE

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

1. Tiered Documents

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

"Tiering refers to using the analysis of general matters contained in a broader EIR (such as the one prepared

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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

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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.

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II. Environmental Checklist

1. **Project Title**: Conditional Use Permit #25-0004 & Variance #25-0001
2. **Lead Agency**: Imperial County Planning & Development Services Department
3. **Contact person and phone number**: Luis Bejarano, Planner II, (442)265-1736, ext. 1745
4. **Address**: 801 Main Street, El Centro CA, 92243
5. **E-mail**: luisbejarano@co.imperial.ca.us
6. **Project location**: 1734 Underwood Rd, Holtville, CA 92250, Assessor's Parcel Number (APN) 045-600-017-000
7. **Project sponsor's name and address**: VB BTS III, LLC
8. **General Plan designation**: Urban
9. **Zoning**: A-1-U (Limited Agriculture with an Urban Overlay)

10. **Description of project**: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

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

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

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area.

11. **Surrounding land uses and setting**: The proposed wireless communication facility would be located at 1734 E Underwood Rd, Holtville, CA 92250 and will disturb approximately 1,600 ft^2 of the 5.51-Acre subject parcel. The property is identified as Assessor's Parcel Number (APN) 045-600-017-000 and is further described as Block 65 & W2 of VAC ST ADJ TSTE TR 87 15-15 5.51 AC, Section 26, Township 15 South, Range 15 East of the San Bernardino Base and Meridian (S.B.B.M.). The proposed project site is surrounded by parcels zoned as A-1-U (Limited Agriculture with an Urban Overlay) on the North, East and West and by other parcels zoned as R-1-U (Light Residential with an Urban Overlay) on the South. The proposed project is consistent with the A-1 zone under an approved Conditional Use Permit (Division 5, Section 90507.02(jj)).

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**

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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 confidentially, etc.?

The Quechan and Campo Band of Mission Indian Tribes have requested to be consulted under Assembly Bill 52. Consultation letters were sent to the Quechan and Campo Band of Mission Indian Tribes on April 30, 2025. The County received on April 30, 2025, an email response from the Quechan Indian Tribe advising they had no comments for this project. Additionally, an email from the Campo Band of Mission Indians Tribe was received on May 17, 2025, mentioning possible concerns on the project location. After further review of the project scope of work, no additional comments have been submitted.

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.

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ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

ENVIRONMENTAL EVALUATION COMMITTEE (EEC) DETERMINATION

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

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

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

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

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

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

EEC VOTES	YES	NO	ABSENT
PUBLIC WORKS	☒	☐	☐
ENVIRONMENTAL HEALTH SVCS	☐	☐	☒
OFFICE EMERGENCY SERVICES	☒	☐	☐
APCD	☒	☐	☐
AG	☒	☐	☐
SHERIFF'S DEPARTMENT	☐	☐	☒
ICPDS	☒	☐	☐

Jim Minnick, Director of Planning/EEC Chairman

Date: 7-24-2025

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PROJECT SUMMARY

A. **Project Location**: The proposed wireless communication facility would be located at 1734 E Underwood Rd, Holtville, CA 92250; Assessor's Parcel Number (APN) 045-600-017-000.

B. **Project Summary**: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 120-foot unmanned monopole tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

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

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

While no water or sewer services are required, a proposed Imperial Irrigation District (IID) transformer will be added adjacent to the lease area.

C. **Environmental Setting**: The proposed project site is located within a parcel containing an existing residence towards the southeast corner of the parcel owned by Jesus Diaz Gonzales, zoned as A-1-U (Limited Agriculture with an Urban Overlay). The proposed project site is relatively flat, located towards south of Thiesen Road and north of Underwood Road, +/- 740 feet east of Melon Rd in an unincorporated portion of the County of Imperial, approximately 670 feet north from the City of Holtville and 8 miles northeast from the City of El Centro.

D. **Analysis**: The proposed project is for the installation of a 120-foot monopole communication tower with a (10) ten-foot lightning rod, for a total height of 130-foot tower on a 40' x 40' leased, fenced area and remote, unmanned equipment. The proposed height of the tower does not conform to the maximum height limit of the project's site A-1 zone requirements, which allows a communications tower up to 60 feet in height. For this reason, the project was reviewed by the Airport Land Use Commission on June 18, 2025, and was found to be consistent with the 1996 Airport Land Use Compatibility Plan. Initial Study #25-0012 will analyze any impacts related to the proposed project.

E. **General Plan Consistency**: Per the Imperial County General Plan, the land use designation for this project is "Agriculture." The proposed project is consistent with the A-1 zone under an approved Conditional Use Permit (Division 5, Section 90508.02(s)), it is determined that it seems to be consistent with Division 24, Section 92401.00 – Purpose, "…This Section standards are intended to protect, and promote public health, safety, community welfare and the unique visual character of the Imperial County [by] minimizing the number of towers throughout the community..." as the proposed telecommunications tower would be situated approximately 1.5 miles north of an existing telecommunications tower owned by SBA Structures, LLC, operating under Conditional Use Permit #19-0030. Additionally, the tower will be covering an unserved area with only marginal coverage.

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Exhibit "A"
Vicinity Map

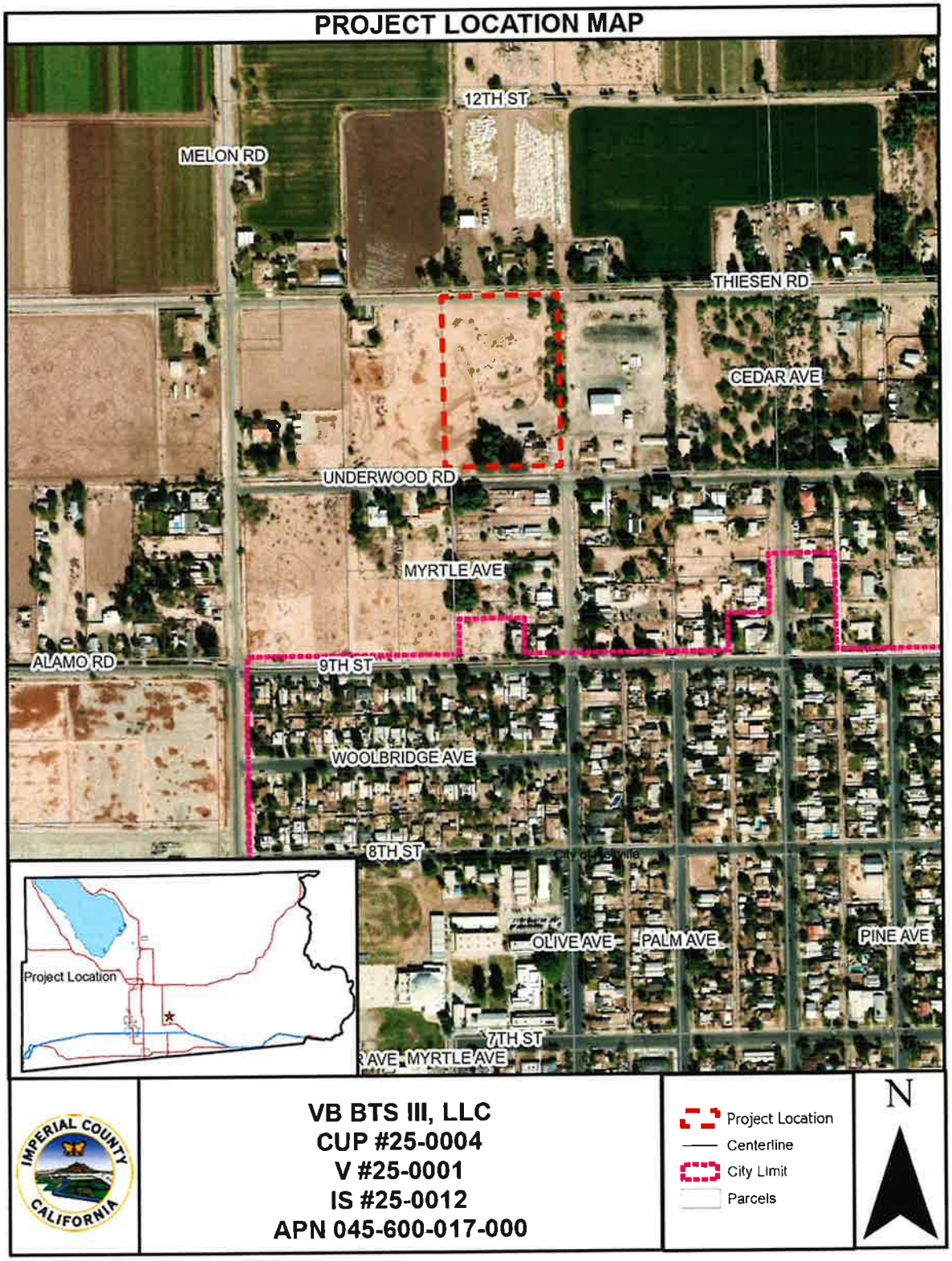
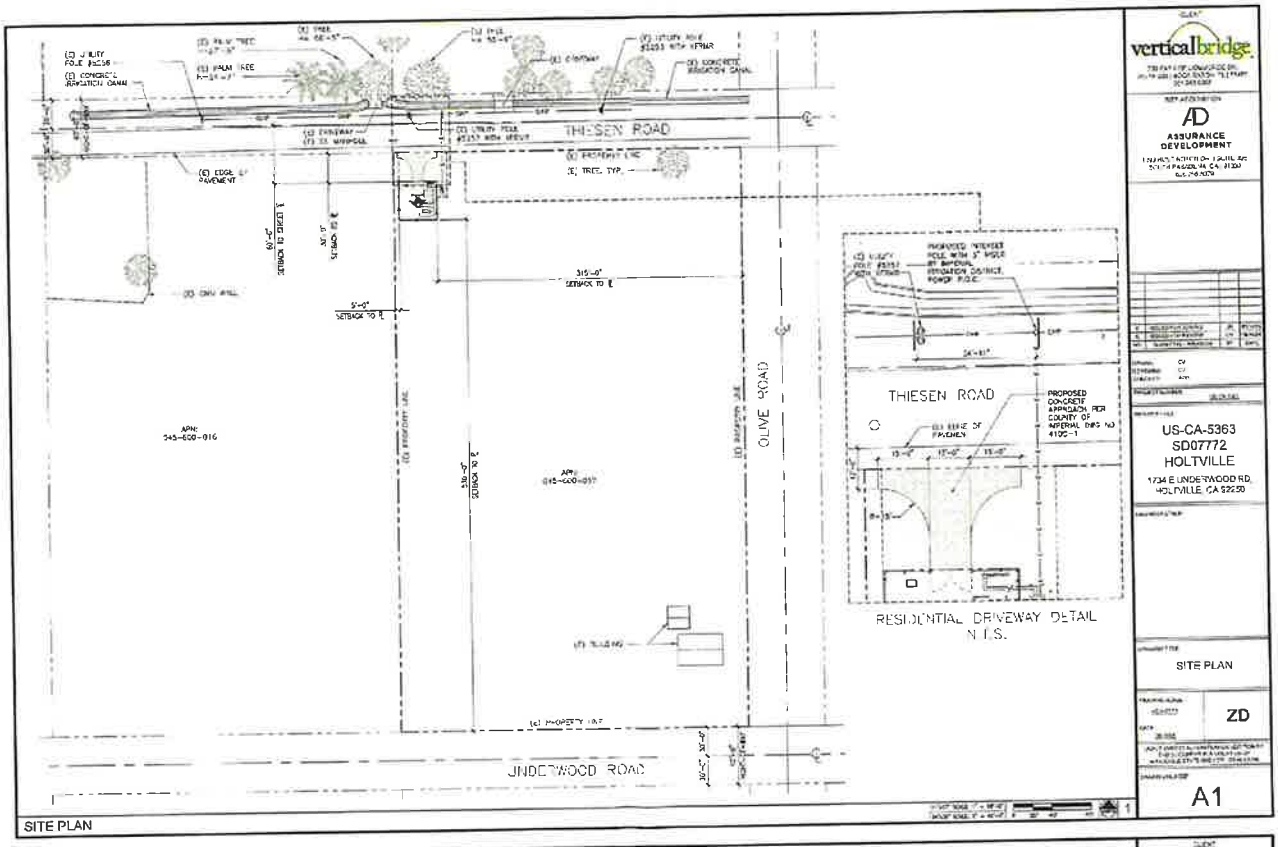
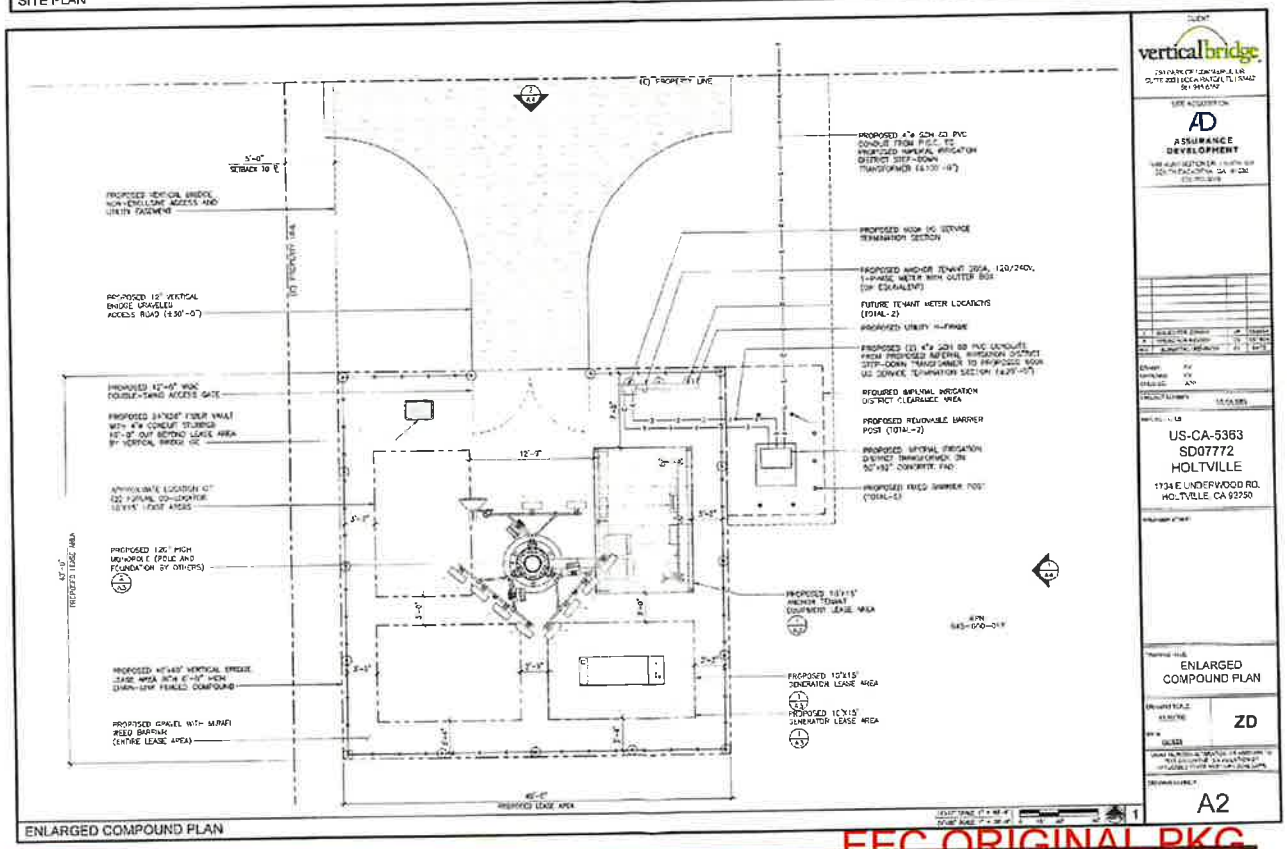

PROJECT LOCATION MAP
12TH ST
MELON RD
THIESEN RD
CEDAR AVE
UNDERWOOD RD
MYRTLE AVE
ALAMO RD
9TH ST
WOOLBRIDGE AVE
8TH ST
OLIVE AVE
PALM AVE
PINE AVE
7TH ST
MYRTLE AVE
Project Location
VB BTS III, LLC
CUP #25-0004
V #25-0001
IS #25-0012
APN 045-600-017-000
Project Location
Centerline
City Limit
Parcels
N

Exhibit "B"
Site Plan





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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)	Less Than Significant with Mitigation Incorporated (LTSWMI)	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) Four areas within the County have the potential as state-designated scenic highways; however, the project site is not located near any scenic vista or scenic highway according to the Imperial County General Plan Circulation and Scenic Highway Element[1] and California State Scenic Highway System Map[2]. Additionally, the proposed telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment. No 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) As previously stated on section (I)(a), the proposed project is not located near a scenic vista or scenic highway and would not substantially damage any scenic resources. 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 unmanned telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment and would not significantly or physically degrade the visual character of the site and its surroundings. It is also consistent with the Aesthetic requirements as specified in the County's Communication Ordinance (Division 24), Section 92404.01(R). No impacts are anticipated.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ☐ ☐ ☒ ☐

d) As previously stated on section (I)(a), the proposed unmanned telecommunications tower is anticipated to maintain a galvanized steel finish to reduce visual obstructiveness and blend with the existing natural environment and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Additionally, per Imperial County's Communication Ordinance (Division 24), Section 92401.04(I), all communication facilities, including towers, shall be lit with approved lighting as required by the Federal Aviation Administration (FAA) and Airport Land Use Commission (ALUC) standards. Subsequently, on June 18, 2025, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed self-supported monopole telecommunications tower project and found it to be consistent with the 1996 Airport Land Use Compatibility Plan. A white daytime beacon and a red night beacon will be required for this proposed project. Compliance with FAA and ALUC standards would bring any impact to less than significant.

II. *AGRICULTURE AND FOREST RESOURCES*

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

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ☐ ☐ ☐ ☒

a) The proposed project is for the construction of an unmanned telecommunications tower located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-

[1] Imperial County General Plan, Circulation and Scenic Highway Element https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf
[2] California State Scenic Highway System Map https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d087d4cca9e8067a16f1a6...

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

Family Dwelling Unit is currently located on the Southeast corner. Additionally, the proposed project site is listed as "Other Land" per the California Important Farmland Finder: Imperial County 2018[3]; the proposed project will not convert any type of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impacts are expected.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? ☐ ☐ ☐ ☒

b) The County of Imperial has no current active Williamson Act contracts. Additionally, according to the California Williamson Act Enrollment Finder[4], Imperial County is withdrawn from the 2022 Williamson Act; therefore, the proposed project is not expected to conflict with existing zoning for agricultural use, or a Williamson Act Contract. No Impacts are expected.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? ☐ ☐ ☐ ☒

c) As previously stated on section (II)(a), the proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. The current land use designation per Imperial County General Plan Land Use Map[5] is Urban and it is not expected that the proposed project conflicts with existing zoning, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 5114(g)). Therefore, no impact is expected.

d) Result in the loss of forest land or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

d) As previously stated under item (II)(c) above, the proposed project is not located in a forest land, therefore, it is not expected to result in the loss of forest land or conversion of forest land to non-forest. Therefore, no impact is expected.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒

e) As previously stated on section (II)(a), the proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. The current land use designation per Imperial County General Plan Land Use Map[5] is Urban and it is not expected that the proposed project will conflict with existing zoning, or cause rezoning that would result in the loss or conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Therefore, no impact is expected.

III. *AIR QUALITY*

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

a) Conflict with or obstruct implementation of the applicable air quality plan? ☐ ☐ ☒ ☐

a) The proposed project is for the construction of a wireless telecommunications tower with associated remote and unmanned equipment located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner. It is not expected that the proposed project will conflict with or obstruct implementation of the applicable air quality plan. Per Imperial County Air Pollution Control District's comment letter dated May 13, 2025[6], the project must comply with all Air District rules and regulations and would emphasize Regulation VIII. Regulation VIII is a collection of rules designed to limit emissions of fugitive dust to 20% opacity. Any generator included in the scope of work of the project exceeding 50 horsepower will be subject to permitting requirements. The applicant will be required to contact the Permitting & Engineering Division of the Air

[3] California Important Farmland Finder: Imperial County 2018 https://maps.conservation.ca.gov/DLRP/CIFF/
[4] California Williamson Act Enrollment Finder https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html
[5] Imperial County General Plan Land Use Map https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=078e1e32c6dc4223ba8c7d69d7c6c383
[6] Imperial County Air Pollution Control District Comment Letter dated May 13, 2025

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

District to confirm if a permit is required. Adherence and compliance with ACPD's rules and regulations will bring any impact to less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? ☐ ☐ ☒ ☐

b) As previously stated under item (III)(a) above, the proposed unmanned wireless telecommunications tower with associated remote and unmanned equipment shall comply with the rules and regulations of the Imperial County Air Pollution Control District. It is expected that by following the above-mentioned rules and regulations, the proposed project would not substantially contribute to an existing or projected air quality violation. Therefore, any impacts are expected to be less than significant.

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

c) The proposed wireless telecommunications tower with associated remote and unmanned equipment is not expected to expose sensitive receptors to substantial pollutants concentrations. However, during the construction phase any earth-moving activities and diesel exhaust and volatile organic compound (VOC) emissions which are typically related to construction trucks and machinery are the pollutants that could possibly affect the nearest sensitive receptors, and exposure would be temporary and would be lessened by adhering to Air Pollution Control District's and Division of Environmental Health rules and regulations. Compliance with APCD's requirements would bring any impact to less than significant.

d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people? ☐ ☐ ☒ ☐

d) The proposed project does not anticipate creating objectionable odors that would adversely affect a substantial number of people. Although some pollutants may be emitted during construction activities and as previously stated on item (III)(a) above, compliance with ACPD's Regulation VIII, and adherence to the California Building Code would bring any impacts to less than significant.

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

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

a) The proposed project will be located within a 1,600 sq. ft. leased, fenced area, on the undeveloped northern portion of a parcel owned by the Jesus Diaz Gonzales where a Single-Family Dwelling Unit is currently located on the Southeast corner of the subject property. Said location is surrounded by other parcels with residential uses on its majority, with the exception of the parcel towards east, which is owned by the County of Imperial and currently occupied by Public Works. All neighboring parcels have been disturbed by at least one building and are currently being occupied. According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 1 "Sensitive Habitat Map"[7a] the project is not located within a sensitive habitat area. Additionally, in accordance to Figure 2 "Sensitive Species Map"[7b] and the Department of Fish and Wildlife Predicted Habitat Map[8], the project is located within the Burrowing Owl Species Distribution Model area. Subsequently, according to U.S. Fish and Wildlife Service Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning publication[9]: Sitting and Construction of New Towers, section (5)(a) – "Tower Design," new towers should be no more than 199 feet above ground level (AGL) as this height increases the mean free airspace between the top of the tower and average bird flight height, even in weather conditions with reduced cloud ceiling. Moreover, in accordance with section (5)(c)(iii), if taller than 199 feet AGL, towers requiring lights for aviation safety must be constructed and the minimum amount of pilot warning and obstruction avoidance lighting required

[7] Imperial County General Plan: Conservation and Open Space Element https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf

[8] California Department of Fish and Wildlife Burrowing Owl Predicted Habitat https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25

[9] U.S. Fish and Wildlife Service, Recommended Best Practices for Communication Tower: Design, Sitting, Construction, Operation, Maintenance, and Decommissioning https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

by the FAA should be used. However, the proposed project includes a 130 feet tower that would not exceed the maximum height recommended by the U.S. Fish and Wildlife. Consequently, it does not appear to have a substantially adverse effect, either directly or through habitat modification, or to any species identified as a candidate, sensitive, or of special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife Service. Adherence to the U.S. Fish and Wildlife & FAA standards and regulations should bring any impacts to less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? ☐ ☐ ☒ ☐

b) As previously stated on section (IV)(a), the proposed project site is not located within a sensitive or riparian habitat, or on other sensitive natural community area as depicted on Figure 3 "Agency-Designated Habitats Map[7C]" from the Imperial County General Plan's Conservation and Open Space Element[7]. Additionally, the proposed project site is within a parcel with an existing single family dwelling unit; this lot is actively being used for residential purposes; therefore, it does not appear to have a substantial effect in local regional plans, policies, and regulations with respect to sensitive natural communities or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Any impacts are expected to be less than significant.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ☐ ☐ ☒ ☐

c) According to the National Wetlands Inventory: Surface Waters and Wetlands Map[10], National Water Information System: Mapper[11], and California Sustainable Groundwater Management Act (SGMA) Data Viewer[12], the proposed project is not located within a riparian habitat and which will not cause a substantial adverse effect on federal protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Any impacts are expected to be less than significant.

d) Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ☐ ☐ ☒ ☐

d) The proposed project site is located on a parcel zoned as A-1 (Limited Agriculture) with an existing Single Family Dwelling Unit located on the Southeast portion of the property, said parcel contains an overall area of approximately ±5.51 acres, while the proposed project expects to occupy an estimated area of 1,600 sq. ft. The project location is adjacent to other parcels with the same zone with existing residential uses. As previously stated on item (IV)(b) above, the project site is not located within a Sensitive Habitat; therefore, it would not interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Any impacts are expected to be less than significant.

e) Conflict with any local policies or ordinance protecting biological resource, such as a tree preservation policy or ordinance? ☐ ☐ ☐ ☒

e) The proposed project does not conflict with any local policy or ordinance protecting biological resources, such as tree preservation policies or ordinances. No impacts are expected.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? ☐ ☐ ☒ ☐

f) The proposed project site is not located within a designated sensitive area according to the Imperial County General Plan's Conservation and Open Space Element[7]; therefore, it would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Any impacts are expected to be less than significant.

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[10] National Wetlands Inventory: Surface Waters and Wetlands Map https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

[11] National Water Information System: Mapper https://maps.waterdata.usgs.gov/mapper/index.html

[12] California Sustainable Groundwater Management Act (SGMA) Data Viewer https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? ☐ ☐ ☒ ☐

a) According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 5-"Areas of Heightened Historic Period Sensitivity Map[7d]," the proposed project site may be located within the Sitgreaves and Parke Exploration and Trail Route (1770-1890). Additionally, in accordance to Figure 6-"Known Areas of Native American Cultural Sensitivity,[7e]" the proposed project site is not located within the immediate vicinity of a known area of cultural sensitivity to Native Americans. Furthermore, the proposed project would be located in a parcel with existing residential development, adjacent to other parcels with existing residential uses with no documented or known archeological resources. Any impact would be less than significant.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? ☐ ☐ ☒ ☐

b) The proposed project site is located on a parcel with an existing Single Family Dwelling Unit located on the Southeast portion of the property, said parcel contains an overall area of approximately ±5.51 acres, while the proposed project expects to occupy an estimated area of 1,600 sq. ft. Additionally, the project location is adjacent to other parcels with existing residential uses with no documented nor known archeological resources. The proposed wireless telecommunication facility project is not likely to cause a substantial adverse change to any archeological resource. Any impacts are expected to be less than significant.

c) Disturb any human remains, including those interred outside of dedicated cemeteries? ☐ ☐ ☒ ☐

c) As previously stated on items (V)(a) and (V)(b) above, the proposed project site is not located within or adjacent to any cemeteries, therefore, the proposed wireless telecommunication facility would not disturb any human remains, including those interred outside of dedicated cemeteries. Additionally, in the event of an accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site, or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county is contacted to determine that no investigation of the cause of death is required. In addition, the coroner of the county shall contact the Native American Heritage Commission (NAHC) within 24 hours if such remains are believed to pertain to a deceased Native American. Any impacts are expected to be less than significant.

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

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ☐ ☐ ☒ ☐

a) The proposed telecommunications tower facility is not proposing any changes in the existing allowed uses, currently agricultural and residential, therefore, it will not result in potentially significant environmental impacts due to wasteful, insufficient, or unnecessary consumption of energy resources, during the project construction or operation. Additionally, the proposed project site is located within a parcel with residential uses, including a Single-Family Dwelling Unit. Should any new developments occur, said developments would require compliance with the latest edition of the California Building Code and ministerial building permits with the Imperial County Planning and Development Services Department. Furthermore, per comment letter received from the Imperial Irrigation District[13] dated May 2, 2025, if the proposed communication tower requires electrical services, the applicant should contact IID. Any impacts are expected to be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? ☐ ☐ ☒ ☐

b) As previously stated on item (VI)(a) above, the proposed project is for a telecommunications tower facility which does not propose any changes in the existing allowed uses of the subject parcel. New future developments would require compliance with the latest energy efficiency and renewable energy standards and regulations. Therefore, the proposed project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Any impacts are expected to be less than significant.

[13] Imperial Irrigation District, Comment letter dated May 2, 2025

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

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

a) Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury, or death involving: ☐ ☐ ☒ ☐

a) The proposed telecommunications tower facility does not appear to conflict with the geology and soils of the subject parcel on which it is to be situated. Construction and erection of the proposed self-supported monopole telecommunications tower with associated remote and unmanned equipment will be subjected to comply with the latest edition of the California Building Code as well as going through a ministerial building permit review. Therefore, the proposed project would not directly or indirectly cause a potential substantial adverse effects, including risk of loss, injury, or death involving. Adherence and compliance to these standards and regulations would bring any impact to less than significant.

1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42? ☐ ☐ ☒ ☐

1) According to the California Department of Conservation: Fail Activity Map[14], United States Geological Survey's Quaternary Faults Map[15], Imperial County General Plan Seismic and Public Safety Element[16], Figure 2 "Regional Fault Lines", the proposed project site is not located within known fault zone. Although the Brawley Seismic Zone is located approximately 1.35 miles west of the proposed project site, Imperial County is classified as Seismic Zone D per Section 1613 et. seq. of the California Building Code, which requires that any developments within this zone to incorporate the most stringent earthquake resistant measures. The proposed telecommunications tower project would be subject to the latest edition of the California Building Code as well as going through a ministerial building permit review. Adherence and compliance with these standards and regulations would bring any impact to less than significant levels.

2) Strong Seismic ground shaking? ☐ ☐ ☒ ☐

2) As previously stated on item (VII)(a)(1) above, the proposed project is located approximately 1.35 miles west of the Brawley Seismic Zone indicating seismic ground shaking could be expected. Adherence to the latest edition of the California Building Code and as well as to go through a ministerial building permit review would bring any impacts to less than significant levels.

3) Seismic-related ground failure, including liquefaction and seiche/tsunami? ☐ ☐ ☐ ☒

3) The proposed project site is not located in a seiche/tsunami area per the California Tsunami Data Maps[17]. No impacts are expected.

4) Landslides? ☐ ☐ ☒ ☐

4) According to Imperial County General Plan's Seismic and Public Safety Element[16], Figure 3 "Landslide Susceptibility", the proposed project site is not located within the immediate vicinity of a landslide activity area. The topography within the proposed project site is generally flat. However, the construction and erection of the proposed telecommunications facility would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Therefore, less than significant impacts are expected.

b) Result in substantial soil erosion or the loss of topsoil? ☐ ☐ ☒ ☐

b) According to Imperial County General Plan's Seismic and Public Safety Element[17], Erosion (page 15), areas in Imperial County that are most susceptible to erosion include the Algodones Sand Dunes, as well as the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The proposed project is not located within the immediate vicinity of a substantial

[14] California Department of Conservation: Fail Activity Map https://maps.conservation.ca.gov/cgs/fam/

[15] United States Geological Survey's Quaternary Faults Map https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf

[16] Imperial County General Plan Seismic and Public Safety Element https://www.icpds.com/assets/GPA21-0004-Seismic-and-Public-Safety-Element-11-22-2022.pdf

[17] California Tsunami Data Maps https://www.conservation.ca.gov/cgs/tsunami/maps

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

soil erosion area. Any impacts are expected to be less than significant.

c) Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse? ☐ ☐ ☒ ☐

c) As previously stated on sections (VII)(a)(1)-(VII)(a)(4) and (VII)(b) above, the proposed project site is not located on a geological unit that would become unstable or collapse as a result of the proposed telecommunications facility project. Any construction would be subject to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to these standards and regulations would bring any impact to less than significant.

d) Be located on expansive soil, as defined in the latest Uniform Building Code, creating substantial direct or indirect risk to life or property? ☐ ☐ ☒ ☐

d) According to the U.S. Department of Agriculture, Natural Resources Conservation Service "Soil Maps"[18] the proposed project site is located on an area containing Imperial-Glenbar, and silty clays loams. However, as previously stated on section (VII)(c), the proposed project design and subsequent construction will require adherence and compliance to the latest edition of the California Building Code standards and regulations, as well as going through a ministerial building permit review which would bring any impacts to less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? ☐ ☐ ☐ ☒

e) The proposed project is for the construction and erection of a telecommunications tower which does not propose any septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Additionally, should any septic systems be proposed in the near future, the applicant should adhere and comply with the Imperial County Public Health Department, Division of Environmental Health standards and regulations. No Impacts are expected.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ☐ ☐ ☒ ☐

f) The proposed project is to be located within a parcel with residential development and does not appear to directly or indirectly destroy a unique paleontological resource or site of unique geologic feature on site as there are no known unique resources or features on site or records of. Additionally, in the event of any paleontological findings on site during construction, all work shall be stopped, and applicant shall contact a qualified paleontological specialist to inspect the site. Any impacts are expected to be less than significant.

VIII. *GREENHOUSE GAS EMISSION Would the project:*

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

a) The proposed telecommunications tower facility is to be located on an area surrounded by parcels already impacted with existing agricultural and residential uses. The action is not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, as previously stated on item (III)(a) above, during the construction phase any earth-moving activities and diesel exhaust and volatile organic compound (VOC) emissions which are typically related to construction trucks and machinery are the pollutants that could possibly affect the nearest sensitive receptors and exposure would be temporary and would be lessened by adhering to Air Pollution Control District's and Division of Environmental Health rules and regulations. Adherence and compliance to APCD's and EHS' rules, regulations, and requirements would bring any impact to less than significant.

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

b) The proposed project would not conflict with any regulations under AB 32 Global Warming Solutions Act of 2006, of

[18] U.S. Department of Agriculture, Natural Resources Conservation Service, Soil Maps https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

reducing the emissions of greenhouse gases to 1990 levels by 2020 provided that the applicant adheres to APCD's and EHS' rules, regulations and requirements. Less than significant impacts are expected.

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

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

a) The proposed project is not expected to create a significant hazard to the public or the environment as it does not involve the handling of any hazardous materials. If the applicant intends to have generator(s) or storage equipment storing 1,320 gallons of petroleum-based products, applicant should contact EHS. Additionally, the applicant shall contact the Air Pollution Control District if the generator exceeds 50 horsepower for an additional permit. Adherence to EHS and APCD requirements should bring any impact to less than significant.

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

b) As previously stated on section (IX)(a) above, the proposed project is not expected to create a significant hazard to the public nor environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment as no hazardous materials are anticipated as part of the project. Additionally, adherence to EHS and APCD requirements should bring any impacts to less than significant.

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

c) The proposed project does not anticipate the emitting of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste as previously stated on items (IX)(a) and (IX)(b) above. Additionally, the nearest school (Holtville High School) is located outside a one-quarter (¼) of a mile radius from the project site, approximately 1,800 ft south. Based on this information and the information provided on the items referenced above, the proposed project would not represent a risk to educational facilities. No impacts are expected.

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

d) The proposed project is not located on a site included on a list of hazardous materials sites according to California Department of Toxic Substances Control EnviroStor[19] or within any of the listed facilities/sites from page 35 of the Imperial County General Plan: Seismic and Public Safety Element[16]; therefore, no impacts are expected.

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

e) The proposed project is not located within an airport land use plan per Imperial County Airport Land Use Compatibility Maps[20]. Additionally, on June 18, 2025, the Imperial County Airport Land Use Commission (ALUC) heard and evaluated the proposed wireless telecommunications tower with associated remote and unmanned equipment project and found it to be consistent with the 1996 Airport Land Use Compatibility Plan. A white daytime beacon and a red night beacon will be required for this proposed project. Compliance with the Federal Aviation Administration (FAA) and ALUC standards, regulations, and recommendations would bring any impact to less than significant.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☒ ☐

[19] California Department of Toxic Substances Control EnviroStor https://www.envirostor.dtsc.ca.gov/public/

[20] Imperial County Airport Land Use Compatibility Maps https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

f) The proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan. The applicant would meet any requirements requested by the IC Fire/OES Department. Less than significant impacts are expected.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? ☐ ☐ ☒ ☐

g) According to CalFire's "Fire Hazard Severity Zones in Local Responsibility Areas – Imperia County Map"[21] effective April 1, 2024, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned; therefore, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildfires. Additionally, as previously discussed in section (IX)(f), the applicant would meet any requirements as set forth by the Imperial County Fire/OES Department. Compliance with the Imperial County Fire Department (ICFD) standards, requirements, and recommendations would bring any impact to less than significant, with mitigations.

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

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☒ ☐

a) The proposed project is for the construction and erection of a telecommunications tower facility with associated remote and unmanned equipment and would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Any impacts are expected to be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ☐ ☐ ☒ ☐

b) As previously stated on item (X)(a) above, the proposed telecommunications facility does not expect to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Any impacts are expected to be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: ☐ ☐ ☒ ☐

c) The proposed project does not anticipate a physical alteration to the site that would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course or a stream or river or through the addition of impervious surfaces. Additionally, per comment letter received from the Imperial Irrigation District dated May 2, 2025[13], an IID encroachment permit is required to utilize existing surface-water drainpipe connections to drains and receive drainage service from the district. Furthermore, any proposed grading will require drainage review and approval from the Imperial County Public Works Department. Adherence to IID and ICDPW requirements would bring any impacts to less than significant.

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

(i) According to Imperial County General Plan's Seismic and Public Safety Element[16], Erosion (page 15), areas in Imperial County that are most susceptible to erosion include the Algodones Sand Dunes, as well as the Chocolate, Picacho, Cargo Muchacho, and Coast Range Mountains. The proposed project site is not located within these areas. Additionally, as previously stated in section (X)(c) above, the Applicant shall furnish a Drainage and Grading Plan to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site proprieties. Therefore, adherence to ICDPW's standards and requirements would bring any impact to less than significant.

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; ☐ ☐ ☒ ☐

(ii) The proposed project is not expected to substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite as the existing drainage patterns would not be substantially altered. Also, as previously

[21] CalFire: Fire Hazard Severity Zones in Local Responsibility Areas-Imperial County Map

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

stated on section (X)(c) above, the Applicant shall furnish a Drainage and Grading Plan to provide for property grading and drainage control, which shall also include prevention of sedimentation of damage to off-site proprieties. Compliance with the Imperial County Department of Public Works requirements would bring any 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; ☐ ☐ ☒ ☐

(iii) The proposed project does not anticipate creating or contributing runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As previously stated on items (X)(c) and (X)(c)(ii) above, any proposed grading or planned stormwater drainage systems will require drainage application, review, and approval from the Imperial County Public Works Department and Imperial Irrigation District. Compliance with Imperial County Public Works Department and Imperial Irrigation District standards and requirements would ensure that any runoff water impacts would be reduced to less than significant levels.

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

(iv) The proposed project is for the construction and erection of a self-supported monopole telecommunications tower facility with associated remote and unmanned equipment and is not expected to impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map[22], the proposed project site is located within "Zone X" of flood map 06025C1734C, effective September 26, 2008. Additionally, a reviewed and approved grading/drainage letter is to be required by the Imperial County Department of Public Works. Therefore, compliance with ICDPW's standards would bring any impact to less than significant.

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

d) The proposed wireless telecommunications tower facility with associated remote and unmanned equipment project is not located within the proximity of a flood hazard, tsunami, or seiche zones; therefore, impacts related to risk release of pollutants due to project inundation are considered to be low. Additionally, as previously stated on item (X)(c)(iv) above, the proposed project site is located within "Zone X" of flood map 06025C1734C. Compliance with ICDPW's standards would contribute to lower any impacts to less than significant.

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

e) The proposed project is not expected to conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. As previously stated on item (X)(c) above, the proposed project would require a grading letter approved by the Imperial County Public Works Department and adherence to Imperial Irrigation District requirements. Any impacts are expected to be less than significant.

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

a) Physically divide an established community? ☐ ☐ ☐ ☒

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment which would not physically divide an established community; therefore, it does not anticipate changing the existing land use designation and zoning established. No land use or planning impacts are 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) The proposed project is consistent with the Imperial County General Plan and with the County's Land Use Ordinance (Title 9), Division 5, Section 90507.02(s), which states that Communication Towers are permitted in the A-1 (Limited/Light Agriculture) zone only with an approved Conditional Use Permit. Additionally, the proposed project is consistent with the

[22] Federal Emergency Management Agency (FEMA) Flood Map Service Center, Flood Insurance Rate Map https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

County's Land Use Ordinance (Title 9), Division 24 – Communication Ordinance, Section 92401.00 et seq. Any impacts are expected to be less than significant.

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

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

a) The proposed project does not anticipate the removal of mineral resources, and it is not located within the boundaries or vicinity of an active mine per Imperial County General Plan's Conservation and Open Space Element, "Existing Mineral Resources Map"-Figure 8[7F]. No impacts are expected.

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

b) The proposed telecommunications tower will not result in the loss of availability of locally important mineral resources recovery site delineated on a local general plan, specific plan or other land use plan. No impacts are expected.

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

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ☐ ☐ ☒ ☐

a) The proposed project is for the construction and erection of a self-supported wireless telecommunication tower with associated remote and unmanned equipment. A temporary generation of noise would be expected during construction; however, such would not result in the generation of permanent noise beyond that which already occurs on the surrounding area. Such an action would be subject to the Imperial County General Plan's Noise Element[23] which states that construction equipment operations shall be limited to the hours of 7 a.m. to 7 p.m., Monday through Friday, and from 9 a.m. to 5 p.m. on Saturday. Additionally, construction noise from a single piece of equipment or combination, shall not exceed 75 dB Leq when averaged over an eight (8) hour period. Compliance with the Imperial County General Plan's Noise Element would bring any impact to less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels? ☐ ☐ ☒ ☐

b) Ground vibration or groundborne noise may be expected during the telecommunications tower construction and erection; however, as previously stated on item (XIII)(a) above, any construction would be subject to Imperial County General Plan's Noise Element. Any impacts are expected to be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ☐ ☐ ☒ ☐

c) As previously stated on item (IX)(e) above, proposed project is not located within an airport land use plan or private airstrip according to the Imperial County Airport Land Use Compatibility Maps[20]. The nearest airport in the vicinity is the Holtville Airport located approximately six (6) miles east from the proposed project site; therefore, exposure to periodic noise emissions during aircraft takeoff and landing operations are not expected. Any impacts are expected to be less than significant.

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

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and business) or indirectly (for example, through extension of ☐ ☐ ☒ ☐

23 Imperial County General Plan, Noise Element https://www.icpds.com/assets/planning/noise-element-2015.pdf

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

roads or other infrastructure)?

a) The proposed construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment would not induce substantial unplanned population growth in an area, either directly or indirectly, as no changes to the designated agricultural use on the parcel are proposed. Therefore, any impacts are expected to be less than significant.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? ☐ ☐ ☒ ☐

b) The proposed project would not displace substantial numbers of people necessitating the construction or replacement housing elsewhere as no changes to the existing designated agricultural use on the parcel were proposed. Any impacts are expected to be less than significant.

XV. *PUBLIC SERVICES*

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: ☐ ☐ ☒ ☐

a) The proposed telecommunications tower does not anticipate that such would result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios. Any impact would be less than significant.

1) Fire Protection? ☐ ☐ ☒ ☐

1) The proposed project is not expected to result in substantial impacts on fire protection. Any future developments may be subject to fire sprinklers and to have either a private or a public source of water for fire suppression purposes such as pressurized hydrants. Compliance with ICFD requirements would bring any impacts to less than significant.

2) Police Protection? ☐ ☐ ☒ ☐

2) The proposed project is not expected to result in substantial impacts on police protection as after construction, the facility would be unmanned and remotely monitored once constructed. However, should any police protection be required, both the California Highway Patrol and Sheriff's Office South County Patrol have active policing and patrol operations in the area[24]. Any impacts are expected to be less than significant.

3) Schools? ☐ ☐ ☐ ☒

3) The proposed self-supported wireless telecommunications tower facility with associated remote and unmanned equipment is not expected to have a substantial impact on schools. The closest schools within the vicinity of the proposed project site is the Holtville High School located outside a ¼ mile radius, approximately 1,800 feet south in the city of Holtville. No impacts are expected.

4) Parks? ☐ ☐ ☐ ☒

4) The proposed project is not expected to create a substantial impact on parks. No impacts are expected.

5) Other Public Facilities? ☐ ☐ ☒ ☐

5) The proposed telecommunications tower is not expected to have a substantial impact on other public facilities; therefore, any impacts are expected to be less than significant.

XVI. *RECREATION*

a) Would the project increase the use of the existing ☐ ☐ ☐ ☒

[24] Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote and unmanned equipment. Subsequently, the proposed telecommunications tower would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impacts are expected.

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

b) The proposed telecommunications tower does not include nor require the construction or expansion of recreational facilities which might have an adverse effect on the environment; therefore, no impacts are expected.

XVII. *TRANSPORTATION* *Would the project:*

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

a) The proposed project is for the construction and erection of a self-supported wireless telecommunications tower facility with associated remote equipment. After construction, the proposed wireless telecommunications facility will be unmanned and will only require service technicians to visit the site periodically. The proposed telecommunications tower is not expected to conflict with the Imperial County General Plan Circulation and Scenic Highway Element and/or any applicable plan, ordinance or policy related to it. Traffic impacts during construction and subsequent operations of the telecommunications facility are expected to be below the acceptable threshold by the County. Less than significant impacts are expected.

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

b) The proposed self-supported telecommunications tower is approximately 1.15 miles away from the intersection between Thiesen Road and State Highway 115, it does not appear to conflict or be inconsistent with the CEQA guidelines section 15064.3 (b). Any impacts are expected to be less than significant.

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

c) The proposed project is for the construction and erection of a self-supported telecommunications tower facility with associated remote and unmanned equipment located within a parcel with an existing single family dwelling unit. The proposed project's site is compatible with the Imperial County General Plan Land Use Designation and the site design is not expected to increase hazards. Therefore, less than significant impacts are expected.

d) Result in inadequate emergency access? ☐ ☐ ☒ ☐

d) The proposed project would not result in inadequate emergency access. Additionally, no change on existing land use nor zoning are proposed. Access to the proposed project site from Thiesen Road appears to be suitable for emergency response vehicles. 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) According to the Imperial County General Plan's Conservation and Open Space Element[7], Figure 6, the project site is not located within a "Known Area of Native American Cultural Sensitivity". Furthermore, the proposed project would be located in a parcel with existing residential development, adjacent to other parcels with existing residential uses with

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

no documented nor known archeological resources. Any impact would be less than significant.

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

(i) According to the California Historic Resources[25] in Imperial County, the proposed project site is not listed or seem to be eligible under the Public Resources Code Section 21074 or 5020.1 (k); therefore, any impacts are expected to be less than significant.

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

(ii) As mentioned on item (XVIII)(a) Imperial County General Plan's Conservation and Open Space Element[7] does not identify the project location as a "Known Area of Native American Cultural Sensitivity. Additionally, on item (XVIII)(a-i), there are no records of the project site being listed or near a location listed under Public Resources Code Section 21074 or 5020.1(k). Furthermore, as described in Public Resources Code 5024.1, subdivision (c), the proposed project location is not known to be associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage, nor the lives of persons important in our past. The existing residential development within the project location and the surrounding properties do not embody distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values. There are also no records of the project location yielding information important in prehistory or history. Based on this information, any impact would be expected to be less than significant.

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

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects? ☐ ☐ ☒ ☐

a) The proposed self-supported wireless telecommunications tower with associated remote equipment does not require or would not result in the relocation or construction of a new expanded water, wastewater treatment or stormwater drainage, electric power, natural gas or telecommunications facilities, the construction of which could cause significant environmental effects. On May 2, 2024, ICPDS received a comment letter from the Imperial Irrigation District[13] advising if the proposed communication tower would require electrical service, to contact them to initiate the customer service application process. Additionally, the project's plans are to be submitted to IID. Moreover, any construction or operation on IID property or within its existing and proposed right of way or easements including but not limited to: surface improvements such as proposed new streets, driveways, parking lots, landscape, and all water, sewer, storm water, or any other above ground or underground utilities, will require an encroachment agreement. Subsequently, the applicant may not use IID's canal or drain banks to access the project site. Any abandonment of easements or facilities will be approved by IID based on systems (irrigation, drainage, power, etc.). Adherence to IID's recommendations and requirements would bring any impact to less than significant.

b) Have sufficient water supplies available to serve the project from existing and reasonably foreseeable future development during normal, dry and multiple dry years? ☐ ☐ ☒ ☐

b) The proposed project is for the construction and erection of a wireless telecommunications tower with associated remote equipment which does not anticipate the use of a water supply nor a change to the existing use on the parcel; therefore, any impacts are expected to be less than significant.

[25] California Historic Resources in the Imperial County https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐

c) The proposed project does not anticipate any impacts to wastewater as it does not propose to generate any wastewater; therefore, any impacts are expected to be less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

d) The proposed project does not anticipate an excess generation of solid waste. Less than significant impacts are expected.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

e) All proposed projects within the County shall contract with a licensed waste hauler for waste generated by the facility. Should any solid waste generation is to be proposed in the near future, the proposed telecommunications tower shall comply with federal, state, and local management and reduction statutes and regulations related to solid waste if any to be generated on a later time. Any impacts are expected to be less than significant.

XX. *WILDFIRE*

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

a) As previously stated under item (IX)(f) – "Hazards and Hazardous Materials" above, the proposed telecommunications tower would not substantially impair an adopted emergency response plan or emergency evacuation plan. The applicant would meet and adhere to any requirements set forth by the Imperial County Fire/OES Department. Compliance with the Imperial County Fire Department (ICFD) standards and requirements would bring any impact to less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

b) According to CalFire, the proposed project site is designated as "Local Responsibility Area (LRA) Unzoned"[21]. Also, per Imperial County's Seismic and Public Safety Element[16], Figure 6 – "Fire Hazard Severity Zones", the proposed project site is not located within a fire hazard zone. Additionally, as previously stated on section (IX)(g) above, the proposed project site is designated as Local Responsibility Area (LRA) Unzoned and not located within a Fire Hazard Severity Zone (VHFHZ). Furthermore, as previously stated on section (IX)(f), the applicant would meet and adhere to ICFD's standards, requirements, and recommendations; therefore, impacts due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire are expected to be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

c) As previously stated under item (XV)(a)(1) – "Public Services" above, the project design may be required to install the appropriate infrastructure such as a private or a public source of water for fire suppression purposes such as pressurized hydrants. Adherence and compliance with Imperial County Fire Department requirements will bring any impacts to less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

d) As previously stated on item (VII)(a)(4) above, per Imperial County General Plan's Seismic and Public Safety Element[16], "Landslide Activity Map"-Figure 2, the proposed project is not located within a landslide activity area. The topography within the proposed project site is generally flat. Development, proposed project design and subsequent construction will be subjected to compliance with the latest edition of the California Building Code as well as to go through a ministerial building permit review. Adherence and compliance to the California Building Code standards and regulations would bring any impact

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	Potentially Significant Impact **(PSI)**	Less Than Significant with Mitigation Incorporated **(LTSWMI)**	Less Than Significant Impact **(LTSI)**	No Impact **(NI)**

to less than significant levels.

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

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

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	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation Incorporated (LTSWMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

SECTION 3
III. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

IV. PERSONS AND ORGANIZATIONS CONSULTED

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

A. COUNTY OF IMPERIAL

- Jim Minnick, Director of Planning & Development Services
- Michael Abraham, AICP, Assistant Director of Planning & Development Services
- Diana Robinson, Planning Division Manager
- Luis Bejarano, Project Planner
- Imperial County Air Pollution Control District
- Department of Public Works
- Fire Department
- Ag Commissioner
- Environmental Health Services
- Sheriff's Office
- County Executive Office

B. OTHER AGENCIES/ORGANIZATIONS

- Quechan Indian Tribe
- California Department of Transportation (Caltrans)
- Imperial Irrigation District
- Imperial Valley Emergency Communications Authority (IVECA)

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

V. REFERENCES

1. Imperial County General Plan: Circulation and Scenic Highway Element
   https://www.icpds.com/assets/planning/circulation-scenic-highway-element-2008.pdf
2. California State Scenic Highway System Map
   https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa
3. California Important Farmland Finder: Imperial County 2020
   https://maps.conservation.ca.gov/DLRP/CIFF/
4. California Williamson Act Enrollment Finder
   https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html
5. Imperial County General Plan Land Use Map
   https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=078e1e32c6dc4223ba8c7d69d7c6c383
6. Imperial County Air Pollution Control District comment letter dated May 13, 2025
7. Imperial County General Plan: Conservation and Open Space Element
   https://www.icpds.com/assets/planning/conservation-open-space-element-2016.pdf
   a) Figure 1: Sensitive Habitat Map
   b) Figure 2: Sensitive Species Map
   c) Figure 3: Agency-Designated Habitats Map
   d) Figure 5: Areas of Heighten Historic Period Sensitivity Map
   e) Figure 6: Known Areas of Native American Cultural Sensitivity Map
   f) Figure 8: Existing Mineral Resources Map
8. California Department of Fish and Wildlife Burrowing Owl Predicted Habitat
   https://www.arcgis.com/apps/mapviewer/index.html?layers=7408ee3f25e8470488db163c4d00dc25
9. U.S. Fish and Wildlife Service, Recommended Best Practices for Communication Tower: Design, Sitting, Construction, Operation, Maintenance, and Decommissioning
   https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation
10. National Wetlands Inventory Map: Surface Waters and Wetlands
    https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/
11. National Water Information System: Mapper
    https://maps.waterdata.usgs.gov/mapper/index.html
12. California Sustainable Groundwater Management Act (SGMA) Data Viewer
    https://sgma.water.ca.gov/webgis/?appid=SGMADataViewer#currentconditions
13. Imperial Irrigation District comment letter dated May 2, 2025
14. California Department of Conservation: Fault Activity Map
    https://maps.conservation.ca.gov/cgs/fam/
15. United States Geological Survey's Quaternary Faults Map
    https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=5a6038b3a1684561a9b0aadf88412fcf
16. Imperial County General Plan: Seismic and Public Safety Element
    https://www.icpds.com/planning/land-use-documents/general-plan/seismic-and-public-safety
17. California Tsunami Data Maps
    https://www.conservation.ca.gov/cgs/tsunami/maps
18. United States Department of Agriculture- Natural Resources Conservation Service: Soils Map
    https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
19. California Department of Toxic Substances Control: EnviroStor
    https://www.envirostor.dtsc.ca.gov/public/
20. Imperial County Airport Land Use Compatibility Maps
    https://icpds.maps.arcgis.com/apps/webappviewer/index.html?id=46f7796b2dfb4a6db5311d7892f0b411
21. CalFire: Fire Hazard Severity Zones in Local Responsibility Areas – Imperial County Map
    https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-

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2022/fire-hazard-severity-zone-maps---lra/imperial_lra_draft_fhszl06_1_map13.pdf?rev=ae37a06cab87486b8814874bfa7cfb16&hash=4B1355741F43E2EE3852E0A4A20DE497

22. Federal Emergency Management Agency (FEMA) Flood Map Service Center: Flood Insurance Rate Map https://msc.fema.gov/portal/search?AddressQuery=851%20pitzer%20road%20heber%20ca#searchresultsanchor
23. Imperial County General Plan: Noise Element https://www.icpds.com/assets/planning/noise-element-2015.pdf
24. Imperial County Sheriff's Office Operations Map https://icso.imperialcounty.org/operations/
25. California Historic Resources: Imperial County https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=13

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VI. NEGATIVE DECLARATION – County of Imperial

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

Project Name: Conditional Use Permit (CUP) #25-0004 / Variance #25-0001 / Initial Study #25-0012

Project Applicant: VB BTS III, LLC

Project Location: 1734 E Underwood Rd, Holtville, CA 92250

Description of Project: The applicant, Vertical Bridge, is proposing to construct a wireless communications facility (WCF), at the above-mentioned project location, which consists of a 130-foot unmanned monopole tower on a 1,600 sq. ft. leased, fenced area, on the northern portion of the subject parcel (APN) 045-600-017-000, owned by Jesus Diaz Gonzales. The proposed telecommunications tower will be erected, owned, and operated by Vertical Bridge (VB BTS III, LLC). Vertical Bridge has committed to allowing the shared use of the tower for co-location of other antennas, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-location company. The proposed telecommunications facility requires a Conditional Use Permit (CUP #25-0004) and a Variance (V #25-0001) to exceed the 60-feet height limitation for the A-1 (Light Agriculture) zone by 70 feet.

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VII. FINDINGS

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

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

☐ The Initial Study identifies potentially significant effects but:

(1) Proposals made or agreed to by the applicant before this proposed Mitigated Negative Declaration was released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur.

(2) There is no substantial evidence before the agency that the project may have a significant effect on the environment.

(3) Mitigation measures are required to ensure all potentially significant impacts are reduced to levels of insignificance.

A MITIGATED NEGATIVE DECLARATION will be prepared.

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

NOTICE

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

7-24-2025 for
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 7/24/2025
Date

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SECTION 4

VIII. RESPONSE TO COMMENTS

(ATTACH DOCUMENTS, IF ANY, HERE)

IX. MITIGATION MONITORING & REPORTING PROGRAM (MMRP)

(ATTACH DOCUMENTS, IF ANY, HERE)

COMMENT LETTERS

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COUNTY OF IMPERIAL

DEPARTMENT OF PUBLIC WORKS

155 S. 11th Street
El Centro, CA
92243

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

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ICDPW

June 6, 2025

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

RECEIVED
By Imperial County Plannning & Development Services at 4:42 pm, Jun 11, 2025

Attention: Luis Bejarano, Planner I

SUBJECT: **CUP 25-0004 VB BTS III, LLC**
Located on 1734 Underwood Road, Holtville, CA 92250
APN 045-600-017

Dear Mr. Minnick:

This letter is in response to your submittal received by this department on April 30, 2025, for the above-mentioned project. The applicant proposes to install a 120-foot monopole tower as part of a new unmanned wireless communications facility.

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

1. A comprehensive Drainage and Grading Letter accompanied by exhibit that clearly illustrates the proposed property grading, including existing and proposed contours and elevations. This needs to be prepared by a California Licensed Civil Engineer and is required to provide for property grading and drainage control and prevent damage to adjacent properties.

2. Prior the final closing for Planning's Division Building Permit, **a Drainage/Grading certification letter** along with pictures shall be provided by a Civil Engineer or Surveyor that recommended grading and drainage controls were completed per the accepted drainage and grading letter.

3. A Concrete driveway shall be installed from Thielsen Rd existing edge of pavement to County Right-of-Way per ***Dwg. No. 410D-1&2 shall*** be installed (per Section 12.10.020 – Street Improvement Requirements of Imperial County Ordinance.

4. An Encroachment Permit will be required for installing the driveway, temporary traffic control devices, and any activities with County of Imperial Right-of-Way.

INFORMATIVE

- Temporary traffic control devices and plan will be required for any activities within the County of Imperial Right-of-Way (construction, staging of equipment, etc.).

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

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

Respectfully,

John A. Gay, PE
Director of Public Works

By:
Atondo V.
Veronica Atondo, PE, PLS
Deputy Director of Public Works - Engineering

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Luis Bejarano

From: Margo Sanchez
Sent: Monday, May 5, 2025 11:52 AM
To: Aimee Trujillo; ICPDSCommentLetters; Luis Bejarano
Subject: RE: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good morning,

The Agricultural Commissioner's Office has No Comment for this project.

Best regards,
Margo

Margo Sanchez
Deputy Agricultural Commissioner
Deputy Sealer of Weights & Measures
Special Projects / Weights & Measures Division
Imperial County
442.265.1500
7-4:30pm / Off rotating Fridays
agcom.imperialcounty.org

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com; becky@holtvillechamber.org; rosie@holtvillechamber.org; nwells@holtville.ca.gov; achavez@holtville.ca.gov; jeorge@theholtgroup.net; asilva@holtville.ca.gov; celso@husd.net; marcuscuero@campo-nsn.gov; dtsosie@campo-nsn.gov; historicpreservation@quechantribe.com; tribalsecretary@quechantribe.com; byronfrontier@yahoo.com; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good afternoon,

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PC ORIGINAL PKG

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

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, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

EEC ORIGINAL PKG

PC ORIGINAL PKG

150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

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

AIR POLLUTION CONTROL DISTRICT

RECEIVED
By Imperial County Planning & Development Services at 7:26 am, May 13, 2025

May 13, 2025

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

SUBJECT: Conditional Use Permit 25-0004 / Variance 25-0001 for VB BTS III, LLC

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review the application for Conditional Use Permit 25-0004 to install a 120-foot monopole tower as part of a new wireless communications facility located at 1734 Underwood Road in Holtville, California, also described as Assessor's Parcel Number 045-600-017-000. Variance 25-0001 is required to exceed the 60-foot height limitation for the A-1 zone (Limited Agriculture) use.

The applicant must adhere to Air District Regulation VIII which is a set of rules designed to limit emissions of fugitive dust to no more than 20% opacity during construction and operation. Specifically, Rule 801-Construction and Earthmoving Activities, and Rule 805-Paved and Unpaved Roads, since this project plans construction of a new 30-foot access road.

Although the planned footprint of the facility is 1,600 square feet, the total lot acreage listed in the project packet is identified as 5.51 acres. If the construction footprint (including staging area) of the project exceeds 5 acres, a Construction Dust Control Plan must be filed with the Air District. A Construction Notification must be filed with the Air District 10 days prior to the commencement of construction (earthmoving activities).

Project plans include a back-up diesel generator. Generators exceeding 50 horsepower require a permit from the Air District. The applicant should contact the Permitting & Engineering Division of the Air District to confirm if a permit is required.

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The Air District's rule book can be accessed via the internet at https://apcd.imperialcounty.org/rules-and-regulations/. Should you have questions, please call our office at (442) 265-1800.

Sincerely,

Curtis Blondell

Curtis Blondell
APC Environmental Coordinator

Reviewed by,
Monica N. Soucier
APC Division Manager

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PC ORIGINAL PKG

Luis Bejarano

From: Jill Mccormick <historicpreservation@quechantribe.com>
Sent: Wednesday, April 30, 2025 3:10 PM
To: Aimee Trujillo; ICPDSCommentLetters
Subject: Re: [EXTERNAL]:CUP25-0004/V25-0001/IS25-0012 Request for Comments

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

Good afternoon,
This email is to inform you that the Historic Preservation Office does not wish to comment on this project.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com <dvargas@iid.com>; becky@holtvillechamber.org <becky@holtvillechamber.org>; rosie@holtvillechamber.org <rosie@holtvillechamber.org>; nwells@holtville.ca.gov

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<nwells@holtville.ca.gov>; achavez@holtville.ca.gov <achavez@holtville.ca.gov>; jeorge@theholtgroup.net <jeorge@theholtgroup.net>; asilva@holtville.ca.gov <asilva@holtville.ca.gov>; celso@husd.net <celso@husd.net>; marcuscuero@campo-nsn.gov <marcuscuero@campo-nsn.gov>; dtsosie@campo-nsn.gov <dtsosie@campo-nsn.gov>; Jill Mccormick <historicpreservation@quechantribe.com>; Tribal Secretary <tribalsecretary@quechantribe.com>; byronfrontier@yahoo.com <byronfrontier@yahoo.com>; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: [EXTERNAL]:CUP25-0004/V25-0001/IS25-0012 Request for Comments

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

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, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

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Luis Bejarano

From: Daniel Tsosie <dtsosie@campo-nsn.gov>
Sent: Saturday, May 17, 2025 12:25 AM
To: Aimee Trujillo
Subject: Re: CUP25-0004/V25-0001/IS25-0012 Request for Comments

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

Hello. Aimee, after review, on behalf on Campo Band of Mission Indians, we do have concerns and interests due to Tribal knowledge of the Tribal and Cultural affiliated area of the project and due to other sensitive areas adjacent to the proposed project. We Campo would like to be involved with our monitoring team, and provide mitigation, monitoring/discovery planning.

Best regards,

DANIEL TSOSIE
Campo Band of Mission Indians
Cultural Resource Manager

Vice-Chairman- Kumeyaay Heritage Preservation Council
Secretary- Kumeyaay Diegueño Land Conservancy
Campo Band OMI KCRC representative

C: 619-760-6480
O: 619-478-9046 Ext. 278

Sent from my T-Mobile 5G Device
Get Outlook for Android

From: Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>
Sent: Wednesday, April 30, 2025 2:45:16 PM
To: Antonio Venegas <AntonioVenegas@co.imperial.ca.us>; Jolene Dessert <JoleneDessert@co.imperial.ca.us>; Margo Sanchez <MargoSanchez@co.imperial.ca.us>; Belen Leon-Lopez <BelenLeon-Lopez@co.imperial.ca.us>; Monica Soucier <MonicaSoucier@co.imperial.ca.us>; Jesus Ramirez <JesusRamirez@co.imperial.ca.us>; John Hawk <johnhawk@co.imperial.ca.us>; Rebecca Terrazas-Baxter <RebeccaTerrazas-Baxter@co.imperial.ca.us>; Rosa Lopez <RosaLopez@co.imperial.ca.us>; Bari Bean <baribean@co.imperial.ca.us>; Gilbert Rebollar <GilbertRebollar@co.imperial.ca.us>; Jorge Perez <JorgePerez@co.imperial.ca.us>; Jeff Lamoure <JeffLamoure@co.imperial.ca.us>; Alphonso Andrade <AlphonsoAndrade@co.imperial.ca.us>; Marco Topete <marcotopete@co.imperial.ca.us>; Sheila Vasquez-Bazua <sheilavasquezbazua@co.imperial.ca.us>; Robert Menvielle <RobertMenvielle@co.imperial.ca.us>; Andrew Loper <AndrewLoper@co.imperial.ca.us>; Mark Schmidt <MarkSchmidt@co.imperial.ca.us>; rkelley@icso.org <rkelley@icso.org>; Fred Miramontes <fmiramontes@icso.org>; Robert Benavidez <RBenavidez@icso.org>; dvargas@iid.com <dvargas@iid.com>; becky@holtvillechamber.org <becky@holtvillechamber.org>; rosie@holtvillechamber.org <rosie@holtvillechamber.org>; nwells@holtville.ca.gov <nwells@holtville.ca.gov>; achavez@holtville.ca.gov <achavez@holtville.ca.gov>; jeorge@theholtgroup.net <jeorge@theholtgroup.net>; asilva@holtville.ca.gov <asilva@holtville.ca.gov>; celso@husd.net <celso@husd.net>;

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EEG ORIGINAL PKG

Marcus Cuero <marcuscuero@campo-nsn.gov>; Daniel Tsosie <dtsosie@campo-nsn.gov>; historicpreservation@quechantribe.com <historicpreservation@quechantribe.com>; tribalsecretary@quechantribe.com <tribalsecretary@quechantribe.com>; byronfrontier@yahoo.com <byronfrontier@yahoo.com>; David Lantzer <davidlantzer@co.imperial.ca.us>
Cc: Jim Minnick <JimMinnick@co.imperial.ca.us>; Michael Abraham <MichaelAbraham@co.imperial.ca.us>; Diana Robinson <DianaRobinson@co.imperial.ca.us>; Luis Bejarano <luisbejarano@co.imperial.ca.us>; Adriana Ceballos <adrianaceballos@co.imperial.ca.us>; Aimee Trujillo <aimeetrujillo@co.imperial.ca.us>; Allison Galindo <allisongalindo@co.imperial.ca.us>; Kamika Mitchell <kamikamitchell@co.imperial.ca.us>; Kayla Henderson <kaylahenderson@co.imperial.ca.us>; Olivia Lopez <olivialopez@co.imperial.ca.us>; Valerie Grijalva <valeriegrijalva@co.imperial.ca.us>
Subject: CUP25-0004/V25-0001/IS25-0012 Request for Comments

Good afternoon,

Please see attached Request for Comments packet for **CUP#25-0004/ Variance#25-0001/IS#25-0012 (1734 Underwood Rd., Holtville, CA 92250)** VB BTS III, LLC

Comments are due by **May 14th, 2025 at 5:00PM**.

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, please feel free to contact Luis Bejarano at (442) 265-1736 or submit your comment letters to ICPDScommentletters@co.imperial.ca.us.

Thank you,

Aimee Trujillo
Office Technician
Imperial County Planning & Development Services
801 Main Street
El Centro, CA 92243
(442) 265-1736
(442) 265-1735 (Fax)
aimeetrujillo@co.imperial.ca.us

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RECEIVED
By Imperial County Planning & Development Services at 11:09 am, May 02, 2025

May 2, 2025

Mr. Luis Bejarano
Planner I
Planning & Development Services Department
County of Imperial
801 Main Street
El Centro, CA 92243

SUBJECT: 120 ft. Monopole Tower Project; CUP25-0004/V25-0001/IS25-0012

Dear Mr. Bejarano:

On April 30, 2025, the Imperial Irrigation District received from the Imperial County Planning & Development Services Department, a request for agency comments on the installation of a 120 ft. monopole tower project; Conditional Use Permit No. 25-0004, Variance No. 25-0001, Initial Study No. 25-0012. The applicant proposes to install a 120 ft. monopole as part of an unmanned wireless communication facility within a 1,660 sq. ft. fenced area located at 1734 Underwood Road, Holtville, CA (APN 045-570-088-000).

The IID has reviewed the application and has the following comments:

1. If the project requires electrical service, the applicant should be advised to contact Joel Lopez, IID project development planner, at 760-482-3444 or e-mail Mr. Lopez at JFLopez@IID.com, to initiate the customer service application process. In addition to submitting a formal application (available for download at http://www.iid.com/home/showdocument?id=12923), the applicant will be required to submit an AutoCAD file of site plan, approved electrical plans, electrical panel size and panel location, operating voltage, electrical loads, project schedule, and the applicable fees, permits, easements and environmental compliance documentation pertaining to the provision of electrical service to a project. The applicant shall be responsible for all costs and mitigation measures related to providing electrical service to a project.

2. Electrical capacity is limited in the project area. A circuit study may be required. Any system improvements or mitigation identified in the circuit study to enable the provision of electrical service to the project shall be the financial responsibility of the applicant.

3. Applicant shall provide a surveyed legal description and an associated exhibit certified by a licensed surveyor for all rights of way deemed by IID as necessary

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to accommodate the project electrical infrastructure. Rights-of-Way and easements shall be in a form acceptable to and at no cost to IID for installation, operation, and maintenance of all electrical facilities.

4. The project proponent will be required to provide and bear all costs associated with acquisition of land, rights of way, easements, and infrastructure relocations and realignments deemed necessary to accommodate the project. Any street or road improvements imposed by the local governing authority shall also be at the project proponent cost.

5. The applicant will be required to provide rights of ways and easements for any proposed power line extensions and/or any other infrastructure needed to serve the project. In addition, the necessary access to allow for continued operation and maintenance of any IID facilities located on adjoining properties where no public access exists.

6. 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). A copy of the IID encroachment permit application and instructions for its completion are available at the website https://www.iid.com/about-iid/department-directory/real-estate. No foundations or buildings will be allowed within IID's right of way. The IID Real Estate Section should be contacted at (760) 339-9239 for additional information regarding encroachment permits or agreements.

7. 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, water deliveries, canals, drains, etc.) need to be included as part of the project's California Environmental Quality Act (CEQA) and/or National Environmental Policy Act (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.

8. When the project goes through the CEQA compliance process, it is important to bear in mind that to address the project impacts to the electrical utility (i.e., the IID electrical grid), considered under the environmental factor "Utilities and Services" of the Environmental Checklist/Initial Study, to determine if the project would

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require or result in the relocation or construction of new or expanded electric power facilities, the construction or relocation of which could cause significant environmental effects; a circuit study/distribution impact study, facility study, and/or system impact study must be performed.

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

Respectfully,

Donald Vargas
Compliance Administrator II

Jamie Asbury – General Manager
Mike Pacheco – Manager, Water Dept.
Matthew H Smelser – Manager, Power Dept.
Paul Rodriguez – Deputy Mgr. Power Dept.
Geoffrey Holbrook – General Counsel
Joanna Smith-Hoff – Deputy General Counsel
Laura Cervantes. – Supervisor, Real Estate
Jessica Humes – Environmental Project Mgr. Sr., Water Dept.

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ATTACHMENT "I"

ALUC PACKAGE

PC ORIGINAL PKG

ALUC LETTER OF DETERMINATION /

ALUC PACKAGE

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Imperial County Planning & Development Services
Planning / Building

July 03, 2025

Jim Minnick
DIRECTOR

VB BTS II, LLC
Samantha Herrmann
1499 Huntington Dr, Ste 305,
South Pasadena, CA 91030

SUBJECT: **Airport Land Use Commission Determination for Vertical Bridge Tower (CUP#25-0004/V#25-0001)**

Dear Applicant:

The Airport Land Use Commission (ALUC) on June 18, 2025, reviewed the request made by VB BTS II, LLC for the proposed installation of a 120-foot lattice communication tower with a ten-foot lightning rod for a total height of 130-feet located at 1734 E Underwood Rd, Holtville, CA. The applicant requested a review by the Commission for a determination of the consistency or inconsistency with the 1996 Airport Land Use Compatibility Plan (ALUCP).

After conducting a public hearing, and hearing all the opponents and proponents of the proposed monopole, the Commission found it consistent with the 1996 Airport Land Use Compatibility Plan (ALUCP).

If you should you have any questions, please contact Luis Bejarano, Planner II, at (442) 265-1736, extension 1745 or via email at luisbejarano@co.imperial.ca.us.

Sincerely,

JIM MINNICK
ALUC Secretary

By: _____
Luis Bejarano, Planner II

CC: Melissa Keith, mkeith@assurance-group.com
Samantha Herrmann, sherrmann@assurance-group.com
Jim Minnick, Planning & Dev. Services Director
Michael Abraham, AICP, Assistant ICPDS Director
Diana Robinson, Planning Manager
Luis Bejarano, Planner II
LB\OL\S:\AllUsers\APN\045\600\017\CUP25-0004_V25-0001_IS25-0012\ALUC\CUP25-0004 ALUC Determination Ltr.docx

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Imperial County Planning & Development Services
Planning / Building

Jim Minnick
DIRECTOR

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

FROM: Jim Minnick, Secretary
Planning & Development Services Director

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

DATE OF REPORT: June 18, 2025

AGENDA ITEM NO: 3

HEARING DATE: June 18, 2025

HEARING TIME: 6:00 p.m.

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

STAFF RECOMMENDATION

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

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SECRETARY'S REPORT

Project Location:

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

Project Description:

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

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

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

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

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General Plan/ALUCP Analysis:

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

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

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

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

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

ATTACHMENTS:

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

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

EEC ORIGINAL PKG

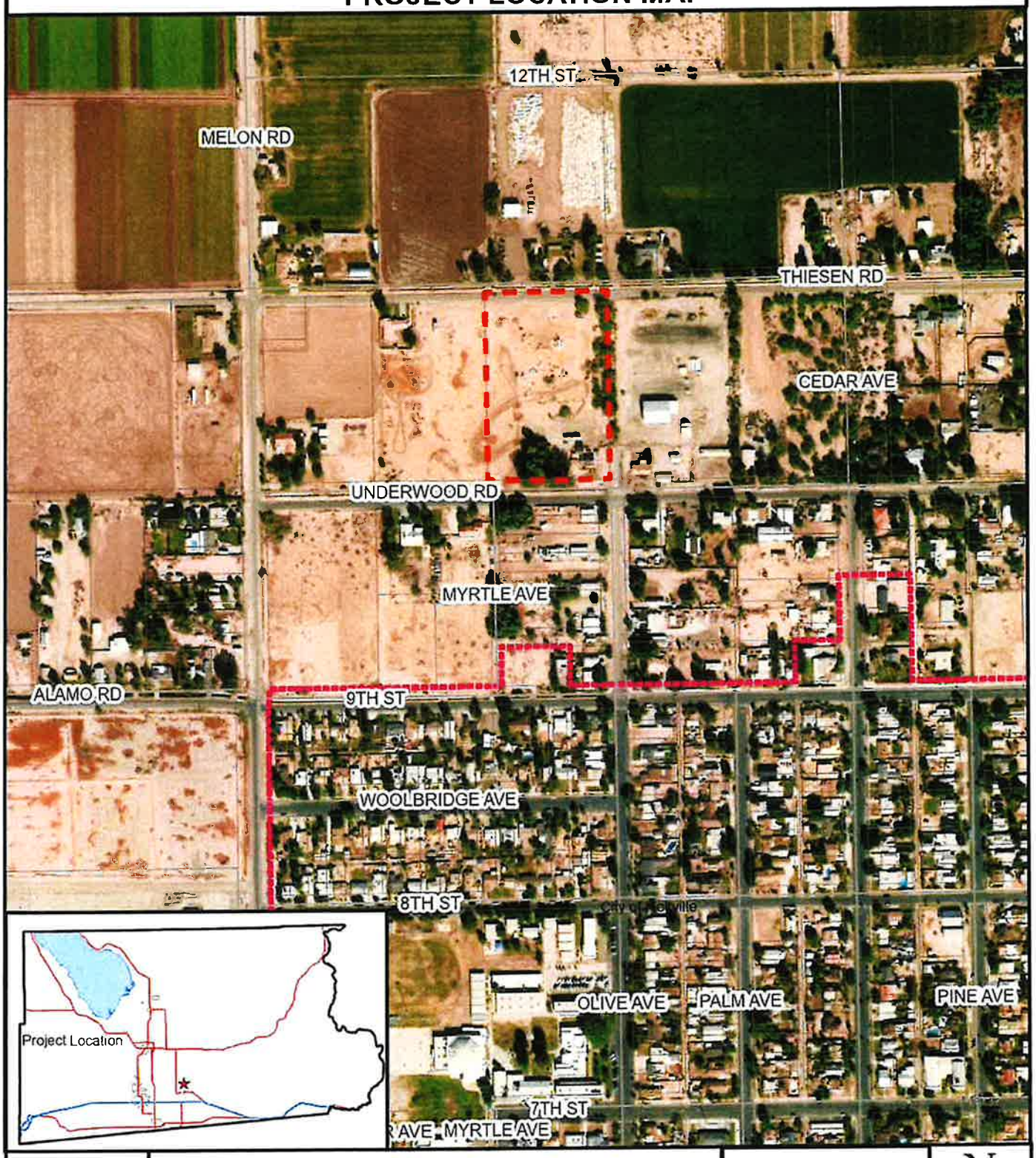
PC ORIGINAL PKG

ATTACHMENT "A" - VICINITY MAP

EEC ORIGINAL PKG

PC ORIGINAL PKG

PROJECT LOCATION MAP



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

Project Location
Centerline
City Limit
Parcels

N

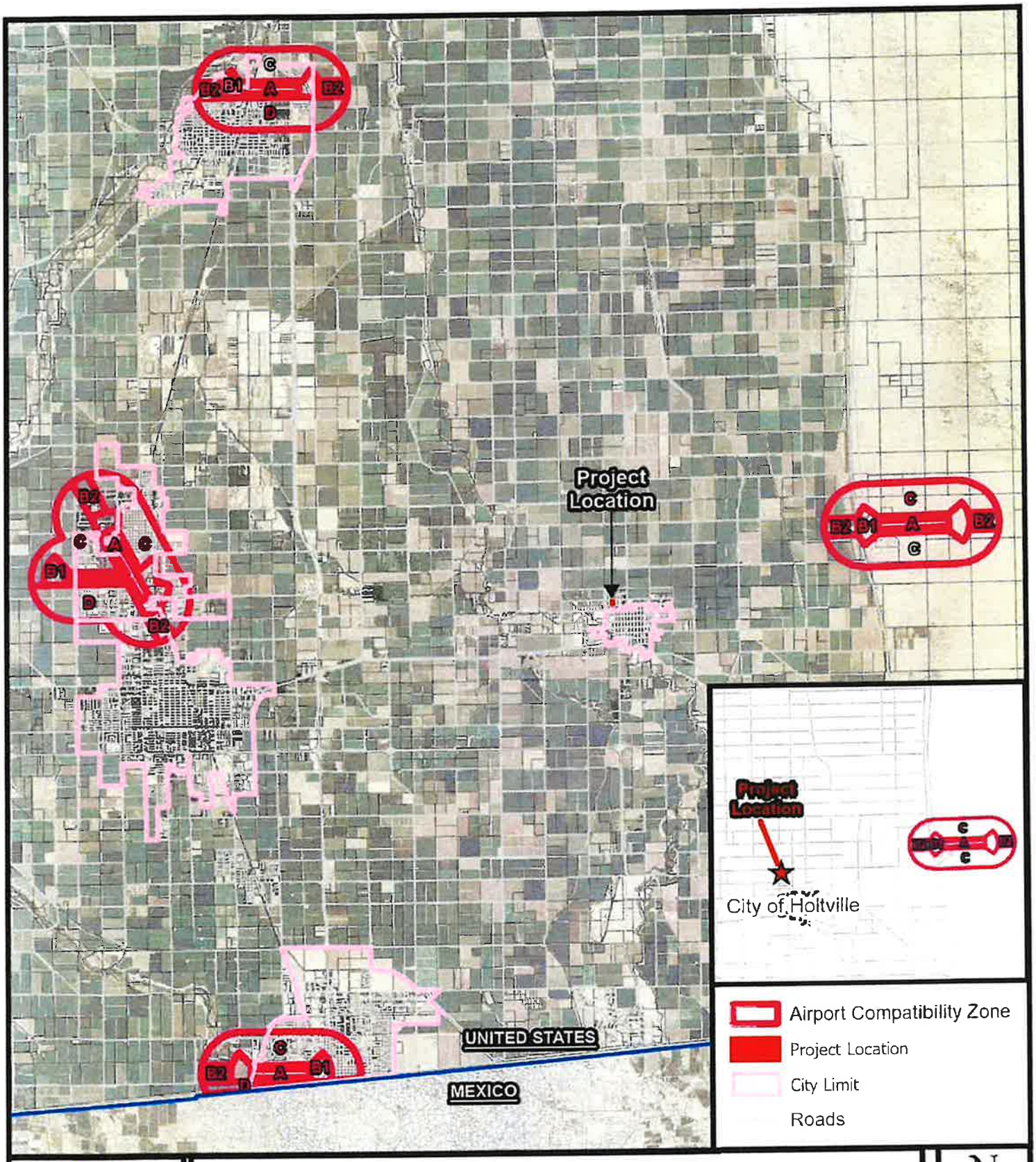
EEC ORIGINAL PKG

PC ORIGINAL PKG

ATTACHMENT "B" – ALUC MAP

EEC ORIGINAL PKG

PC ORIGINAL PKG



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

EEC ORIGINAL PKG

PC ORIGINAL PKG

ATTACHMENT "C" – ASSESSOR'S PLAT MAP

EEC ORIGINAL PKG

PC ORIGINAL PKG

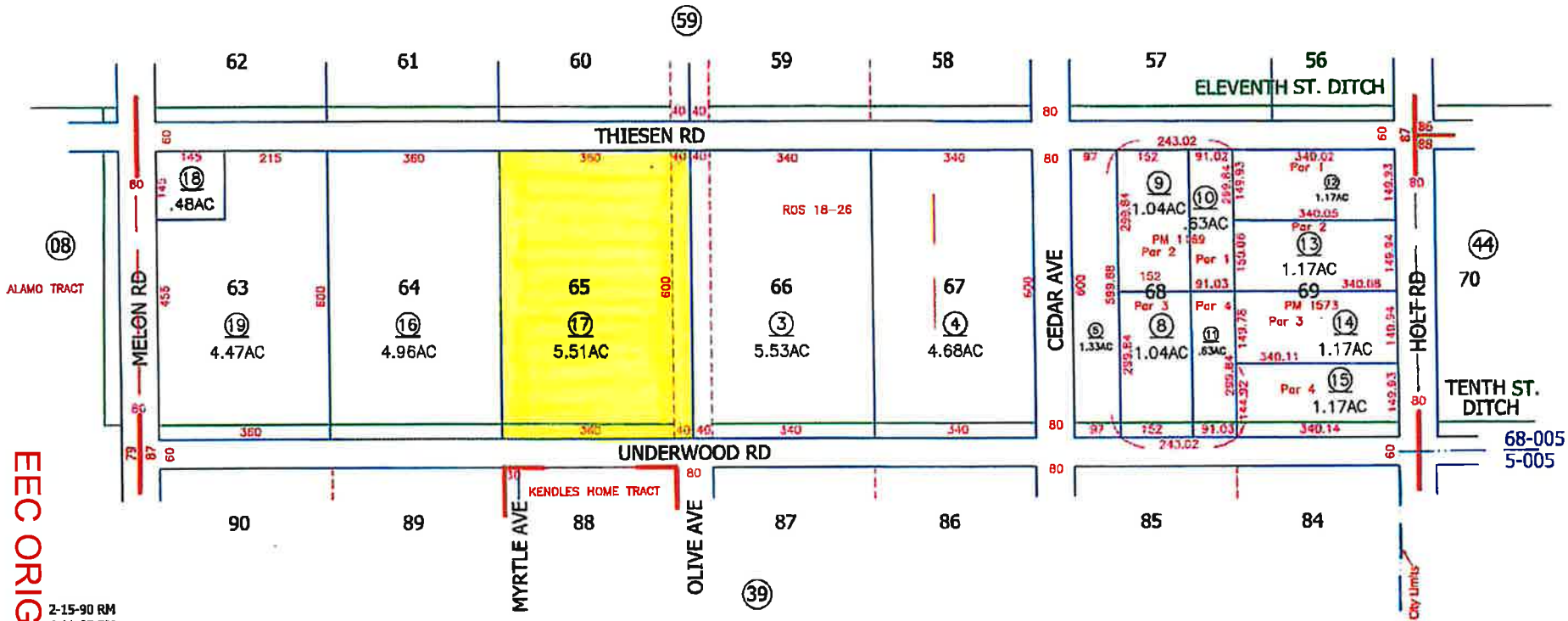
BLKS 63 thru 69 INCL TOWNSITE OF HOLTVILLE (OUTSIDE)

POR TRACT 87 T15S, R15E

O.M. 1-12

Tax Area Code
68-005

45-60



PC ORIGINAL PKG

EEC ORIGINAL PKG

2-15-90 RM
4-11-89 RM
2-2-68 LS
4-27-84 LS
BLOW-UP
From 45-09
5-19-77 DM
RETRACE
1-26-79 LS

3-4-13 MF
9-27-12 MF

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

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

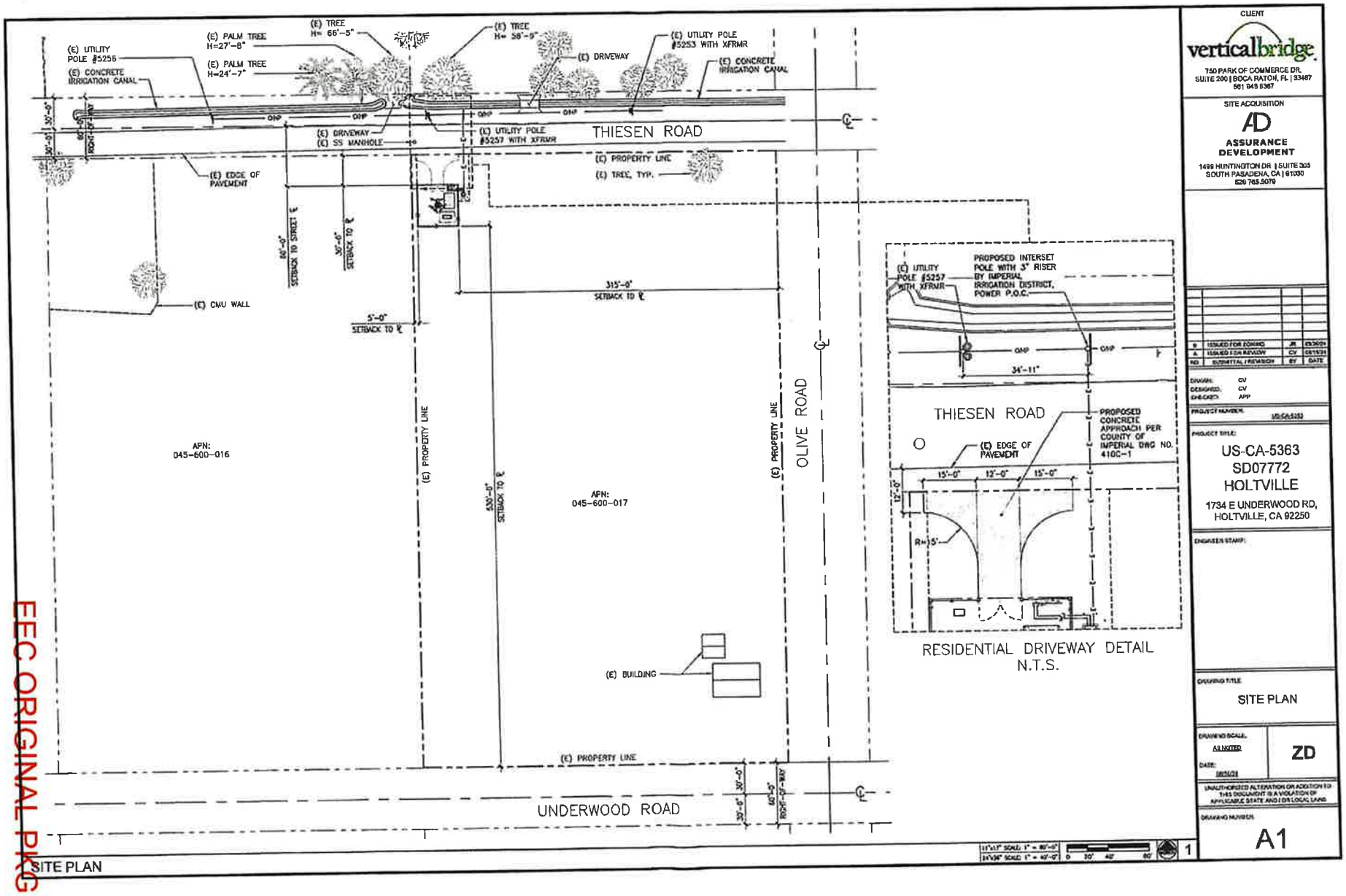
ATTACHMENT "D" – SITE PLAN

EEC ORIGINAL PKG

PC ORIGINAL PKG

PC ORIGINAL PKG

EEC ORIGINAL PKG



SITE PLAN

1

CLIENT

vertical bridge

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

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765.5079

0	ISSUED FOR ZONING	JR	03/26/24
A	ISSUED FOR REVIEW	CV	08/15/24
NO	SUBMITTAL / REVISION	BY	DATE

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

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

ENGINEER STAMP:

DRAWING TITLE
SITE PLAN

DRAWING SCALE:
AS NOTED

ZD

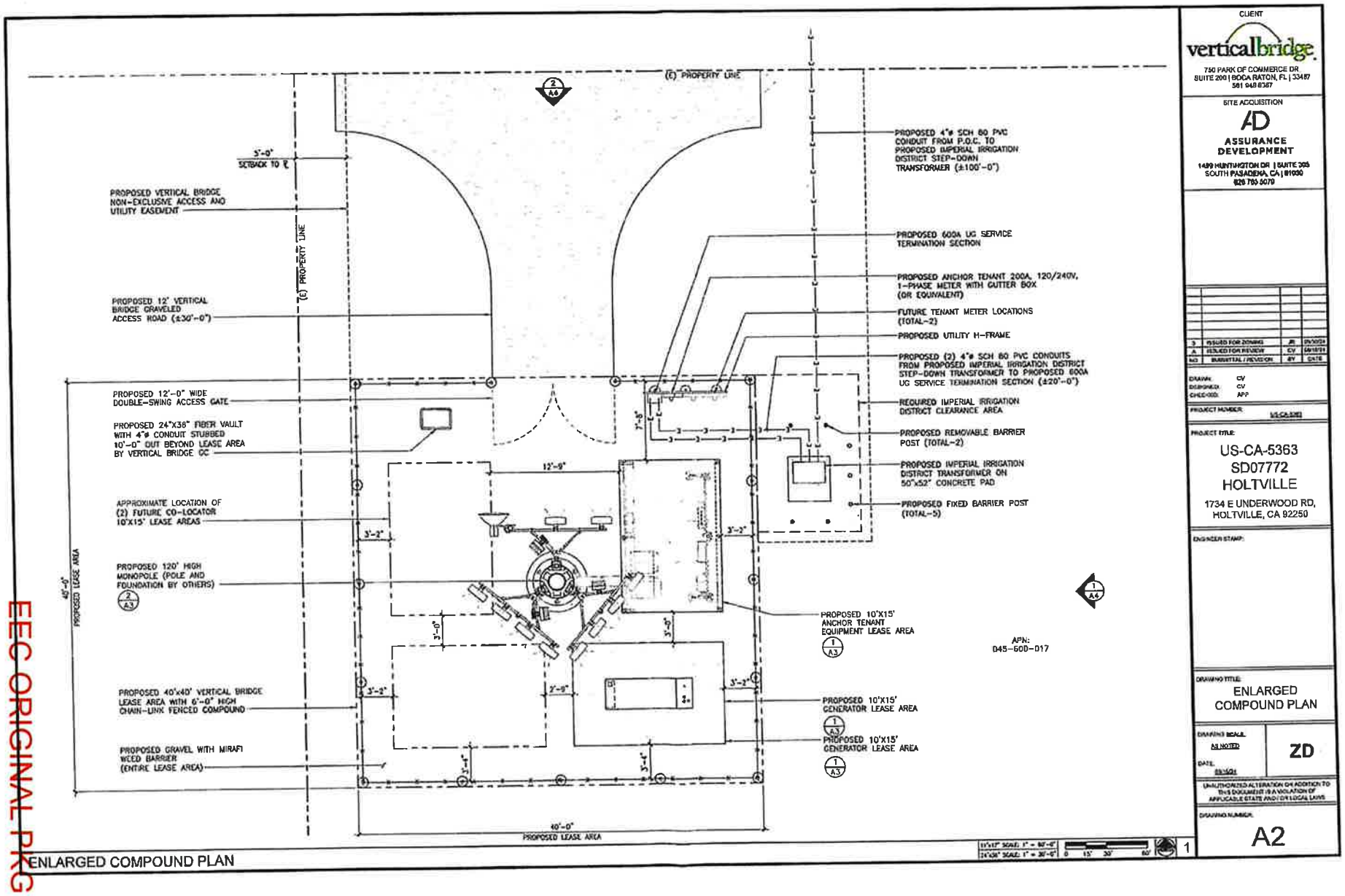
DATE:

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DRAWING NUMBER:
A1

PC ORIGINAL PKG

EEC ORIGINAL PKG



ENLARGED COMPOUND PLAN

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

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

NO	SUBMITTAL / REVISION	BY	DATE
3	ISSUED FOR ZONING	JR	09/30/24
A	REVISED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

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

ENGINEER STAMP:

DRAWING TITLE:
ENLARGED COMPOUND PLAN

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

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

DRAWING NUMBER:
A2

ATTACHMENT "F" – ALUCP SECTION

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Policies

1.SCOPE OF REVIEW

1. Geographic Area of Concern

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

1. *Airport Vicinity* - All lands on which the uses could be negatively affected by present or future aircraft operations at the following airports in the County and lands on which the uses could negatively affect said airports. The specific limits of the planning area for each airport are depicted on the respective *Compatibility Map* for that airport as presented in Chapter 3.

   (a) Brawley Municipal Airport.

   (b) Calexico International Airport.

   (c) Calipatria Municipal Airport.

   (d) Holtville Airport.

   (e) Imperial County Airport.

   (f) Salton Sea Airport.

   (g) Naval Air Facility El Centro.

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2. *Countywide Impacts on Flight Safety* - Those lands, regardless of their location in the County, on which the uses could adversely affect the safety of flight in the County. The specific uses of concern are identified in Paragraph 2.

3. *New Airports and Heliports* - The site and environs of any proposed new airport or heliport anywhere in the County. The Brawley Pioneers Memorial Hospital has a heliport area on-site.

2. Types of Airport Impacts

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

3. Types of Actions Reviewed

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

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

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(a) The adoption or approval of any amendment to a general or specific plan affecting the Commission's geographic area of concern as indicated in Paragraph 1 (Section 21676 (b)).

(b) The adoption or approval of a zoning ordinance or building regulation which (1) affects the Commission's geographic area of concern as indicated in Paragraph 1 and (2) involves the types of airport impact concerns listed in Paragraph 2 (Section 21676 (b)).

(c) Adoption or modification of the master plan for an existing public-use airport (Section 21676 (c)).

(d) Any proposal for a new airport or heliport whether for public use or private use (Section 21661.5).

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

a) Any proposed expansion of a city's sphere of influence within an airport's planning area.

b) Any proposed residential planned unit development consisting of five or more dwelling units within an airport's planning area.

c) Any request for variance from a local agency's height limitation ordinance.

d) Any proposal for construction or alteration of a structure (including antennas) taller than 150 feet above the ground anywhere within the County.

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e) Any major capital improvements (e.g., water, sewer, or roads) that would promote urban development.

f) Proposed land acquisition by a government entity (especially, acquisition of a school site).

g) Building permit applications for projects having a valuation greater than $500,000.

h) Any other proposed land use action, as determined by the local planning agency, involving a question of compatibility with airport activities.

4. Review Process

1. *Timing of Project Submittal* - Proposed actions listed in Paragraph 3.1 must be submitted to the Commission for review prior to approval by the local government entity. All projects shall be referred to the Commission at the earliest reasonable point in time so that the Commission's review can be duly considered by the local jurisdiction prior to formalizing its actions. At the local government's discretion, submittal of a project for Airport Land Use Commission review can be done before, after, or concurrently with review by the local planning commission or other local advisory bodies.

2. *Commission Action Choices* - When reviewing a land use project proposal, the Airport Land Use Commission has a choice of either of two actions: (1) find the project *consistent* with the *Airport Land Use Compatibility Plan*; or, (2) find the project *inconsistent* with the Plan. In making a finding of inconsistency, the Commission may note the conditions under which the project would be consistent with the Plan. The Commission cannot, however, find a project consistent with the Plan subject to the inclusion of certain conditions in the project.

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Table 2A

Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

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

Zone	Additional Criteria		Examples	
	Prohibited Uses	Other Development Conditions	Normally Acceptable Uses	Uses Not Normally Acceptable
A	• All structures except ones with location set by aeronautical function • Assemblages of people • Objects exceeding FAR Part 77 height limits • Hazards to flight[5]	• Dedication of avigation easement	• Aircraft tiedown apron • Pastures, field crops, vineyards • Automobile parking	• Heavy poles, signs, large trees, etc.
B1 and B2	• Schools, day care centers, libraries • Hospitals, nursing homes • Highly noise-sensitive uses • Above ground storage • Storage of highly flammable materials • Hazards to flight[5]	• Locate structures maximum distance from extended runway centerline • Minimum NLR[7] of 25 dBA in residential and office buildings • Dedication of avigation easement	• Uses in Zone A • Any agricultural use except ones attracting bird flocks • Warehousing, truck terminals • Single-story offices	• Residential subdivisions • Intensive retail uses • Intensive manufacturing or food processing uses • Multiple story offices • Hotels and motels
C	• Schools • Hospitals, nursing homes • Hazards to flight[5]	• Dedication of overflight easement for residential uses	• Uses in Zone B • Parks, playgrounds • Low-intensity retail, offices, etc. • Low-intensity manufacturing, food processing • Two-story motels	• Large shopping malls • Theaters, auditoriums • Large sports stadiums • Hi-rise office buildings
D	• Hazards to flight[5]	• Deed notice required for residential development	• All except ones hazardous to flight	

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Table 2A Continued
Compatibility Criteria

Imperial County Airport Land Use Compatibility Plan

NOTES

1 Residential development should not contain more than the indicated number of dwelling units per gross acre. Clustering of units is encouraged as a means of meeting the Required Open Land requirements.

2 The land use should not attract more than the indicated number of people per acre at any time. This figure should include all individuals who may be on the property (e.g., employees, customers/visitors, etc.). These densities are intended as general planning guidelines to aid in determining the acceptability of proposed land uses.

3 See Policy 2.5.

4 These uses typically can be designed to meet the density requirements and other development conditions listed.

5 These uses typically do not meet the density and other development conditions listed. They should be allowed only if a major community objective is served by their location in this zone and no feasible alternative location exists.

6 See Policy 3.4

7 NLR = Noise Level Reduction; i.e., the attenuation of sound level from outside to inside provided by the structure.

BASIS FOR COMPATIBILITY ZONE BOUNDARIES

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

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

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

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

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

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

B1 The outer boundary of the Approach/Departure Zone is defined as the area where aircraft are commonly below 400 feet above ground level (AGL). For visual runways, this location encompasses the base leg of the traffic pattern as commonly flown. For instrument runways, the altitudes established by approach procedures are used. Zone B1 also includes areas within 1,000 feet laterally from the runway centerline.

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

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

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

sm/Imperlt.

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APPLICANT SUBMITTAL

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CONDITIONAL USE PERMIT

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

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

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

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

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

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

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

Jesus Gonzales — Print Name
12/13/24 — Date
Signature

Print Name — Date
Signature

REQUIRED SUPPORT DOCUMENTS

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

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

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

CUP #
25-0004

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VARIANCE

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

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

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

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

8. DESCRIBE VARIANCE REQUESTED (i.e. side yard set-back reduction, etc.)
Requesting the extended height of the tower, 120' that deviates from the maximum height of 60' in the A-1 zone.

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

10. DESCRIBE THE ADJACENT PROPERTY
- East: Zoning: A-1-U, Vacant/Agricultural Use & Structures
- West: Zoning: A-1-U, Residential/Vacant
- North: Zoning: A-1-U, Residential/Agriculture
- South: Zoning: R-1-U, Residential

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

Jesus Gonzales — Print Name — 12/15/22 — Date

Signature

Print Name — Date

Signature

REQUIRED SUPPORT DOCUMENTS

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

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

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

V # 25-0001

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ASSURANCE DEVELOPMENT

RECEIVED
FEB 21 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Attachment 1

Project Narrative

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

Submitted to Imperial County, California
Planning & Development Services Department

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

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

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

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

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

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

Zoning Classification: A-1, Limited Agricultural

General Plan Designation: Urban

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

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

1. PROJECT OVERVIEW

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

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

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

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

2. PROPOSED PROJECT DETAILS

2.1. Location

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

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

2.1.2. Lease area.

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

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

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

2.2. Wireless Facilities and Equipment

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

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

2.2.2. Antennas and accessory equipment.

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

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

2.2.3. Ground equipment.

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

2.3. Additional Details

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

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

3. T-MOBILE NETWORK COVERAGE AND SERVICES

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

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

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

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

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

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

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

4. APPLICABLE LAW

4.1. Local Codes

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

4.2. State Law

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

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

4.3. Federal Law

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

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

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

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

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

[1] *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment,* Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part, City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").
[2] Id. at ¶ 35.
[3] Id. at ¶¶ 34-42.

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

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

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

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

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

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

[4] 47 C.F.R. § 1.6002(g).

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Attachment 2

Statement of Code Compliance

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

Submitted to Imperial County
Planning & Development Services Department

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

Wireless Facilities Requirements

a. Division 24 – Chapter 1 Communication Facilities

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

Division 24 COMMUNICATION FACILITIES

Chapter 1 COMMUNICATION FACILITIES

92401.00 Purpose.

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

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

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

C. Minimize the number of towers throughout the community;

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

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

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

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

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

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

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

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

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

92401.01 Definitions.

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

92401.02 Applicability.

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

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

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

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

92401.03 Exemptions.

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

92401.04 General requirements.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

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

Applicants' Response: Acknowledged.

92401.05 Permitting and application requirements.

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

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

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

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

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

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

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

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

a. The facility complies with all applicable Section 92401.04.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(B) Height.

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

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

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

(C) Onsite Location.

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

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

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

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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

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

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

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

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

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

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

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

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

Applicants' Response: Acknowledged.

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92401.06 Alternatives analysis—Information required.

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

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

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

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

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

92401.07 Visual analysis.

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

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

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

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

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

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

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

92401.08 Radio-frequency exposure review.

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

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

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

1. Facilities described in Table 1 Section 1.1307 "Transmitters, Facilities and Operations Subject to Routine Environmental Evaluation" of the FCC Rules and Regulations, 47 C.F.R. Section 1.1307, or any superseding regulation;
2. Facilities proposed to be installed within fifty (50) feet of an existing communication facility;
3. Facilities with one or more antenna to be installed less than ten (10) feet above any area that is accessible to untrained workers or the public.

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

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

1. The RF environmental evaluation report is subject to approval of the planning director.
2. The RF environmental evaluation report shall be prepared by a radio-frequency exposure professional.
3. The RF environmental evaluation report shall explicitly state that "operation of the proposed facility in addition to other ambient RF emission levels will not exceed current FCC-adopted standards with regard to human exposure in controlled and uncontrolled areas as defined by the FCC."
4. Assumptions utilized for the calculations of RF exposure shall be conservative in nature and at a minimum be in accordance with the most recent FCC guidance on assessment of RF exposures.
5. The RF environmental evaluation report shall compare RF measurements and/or calculations of RF exposure to the applicable FCC exposure standard. The comparison shall include the power density in micro-watts per square centimeter and as a percentage of the applicable FCC exposure standard.
6. RF field measurements of power density of the proposed facility and/or surrounding facilities are required to be included in the RF environmental evaluation report when:
    a. Adequate technical information regarding other wireless communication facilities that may substantially contribute to RF exposure at the subject site is unavailable;
    b. Calculations of RF exposure indicate the possibility of exposures in excess of the FCC exposure standard; or
    c. So directed by the planning director because of concerns about the number of near-by facilities.
7. All required RF field measurements shall be performed by a radio-frequency exposure professional. Evidence must be submitted showing that the testing instrument(s) used were calibrated within their manufacturer's suggested periodic calibration interval, and that the calibration is by methods traceable to the National Institute of Standards and Technology. Measurements shall be performed in compliance with FCC guidance regarding the measurement of RF emissions and shall be conducted during normal business hours on a non-holiday weekday.

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

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

Applicants' Response: Acknowledged.

92401.09 Towers.

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

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

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

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

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

E. A landscape plan showing specific landscape materials;

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

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

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

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

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

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

92401.10 Modifications to facilities.

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

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

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

92401.11 Changes to FCC standards.

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

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

92401.12 Life of approval.

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

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

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

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

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

92401.13 Facilities in existence prior to adoption of these regulations.

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

92401.14 Public benefit.

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

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

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

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

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

Applicants' Response: Acknowledged.

END OF STATEMENT OF CODE COMPLIANCE.

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ASSURANCE
DEVELOPMENT

Attachment 8

Zoning Drawings

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

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PROJECT DESCRIPTION:

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

CODE COMPLIANCE:

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

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

verticalbridge

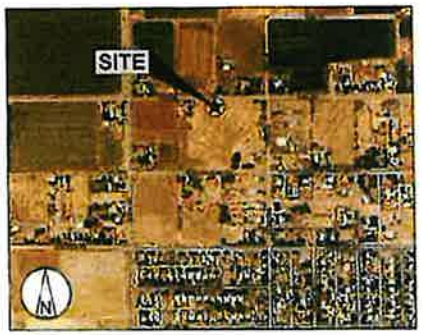
US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

120' MONOPOLE

TENANT SITE ID: SD07772

APPROVAL BLOCK				
		APPROVED	APPROVED AS NOTED	DISAPPROVED REVISE
VERTICAL BRIDGE	DATE	☐	☐	☐
SITE ACQUISITION	DATE	☐	☐	☐
CONSTRUCTION MANAGER	DATE	☐	☐	☐
PERMITTING	DATE	☐	☐	☐
RF ENGINEERING	DATE	☐	☐	☐



VICINITY MAP
NTS

DRAWING INDEX	
DRWG #	TITLE
T1	TITLE SHEET
LS-1	BOUNDARY DETAILS
LS-2	TOPOGRAPHIC SURVEY
A1	SITE PLAN
A2	ENLARGED COMPOUND PLAN
A3	EQUIPMENT AND ANTENNA PLAN
A4	ELEVATIONS



LOCATION MAP
NTS

PROJECT INFORMATION	
SITE NAME:	HOLTVILLE
SITE NUMBER:	US-CA-5363
TENANT SITE ID:	SD07772
SITE ADDRESS:	1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
PARCEL #:	045-600-017
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-1 LIMITED AGRICULTURAL (IMPERIAL COUNTY)
ZONING JURISDICTION:	IMPERIAL COUNTY
CONSTRUCTION TYPE	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE	MONOPOLE
STRUCTURE HEIGHT:	120'
CONSTRUCTION AREA:	1,600 SQ. FT.
GROUND ELEVATION:	-21.93' (NAVD88)
LATITUDE (NAD 83):	32.821736° (32° 49' 18.25" N)
LONGITUDE (NAD 83):	-115.386383° (115° 23' 10.98" W)

EMERGENCY:
CALL 911

UNDERGROUND SERVICE ALERT

PROJECT DIRECTORY	
PROPERTY OWNER:	GONZALES JESUS DIAZ & PRISCILLA (JT) 1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
APPLICANT:	VERTICAL BRIDGE 750 PARK OF COMMERCE DR. #200 BOCA RATON, FL 33487
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE: 626.765.5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT
TELCO COMPANY:	AT&T

CLIENT
verticalbridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561.948.8367

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

3	ISSUED FOR ZONING	JB	07/31/24
2	ISSUED FOR REVIEW	CV	04/16/24
NO.	SUBMITTAL / REVISION	BY	DATE

DRAWN BY: CV
DESIGNED BY: CV
CHECKED BY: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

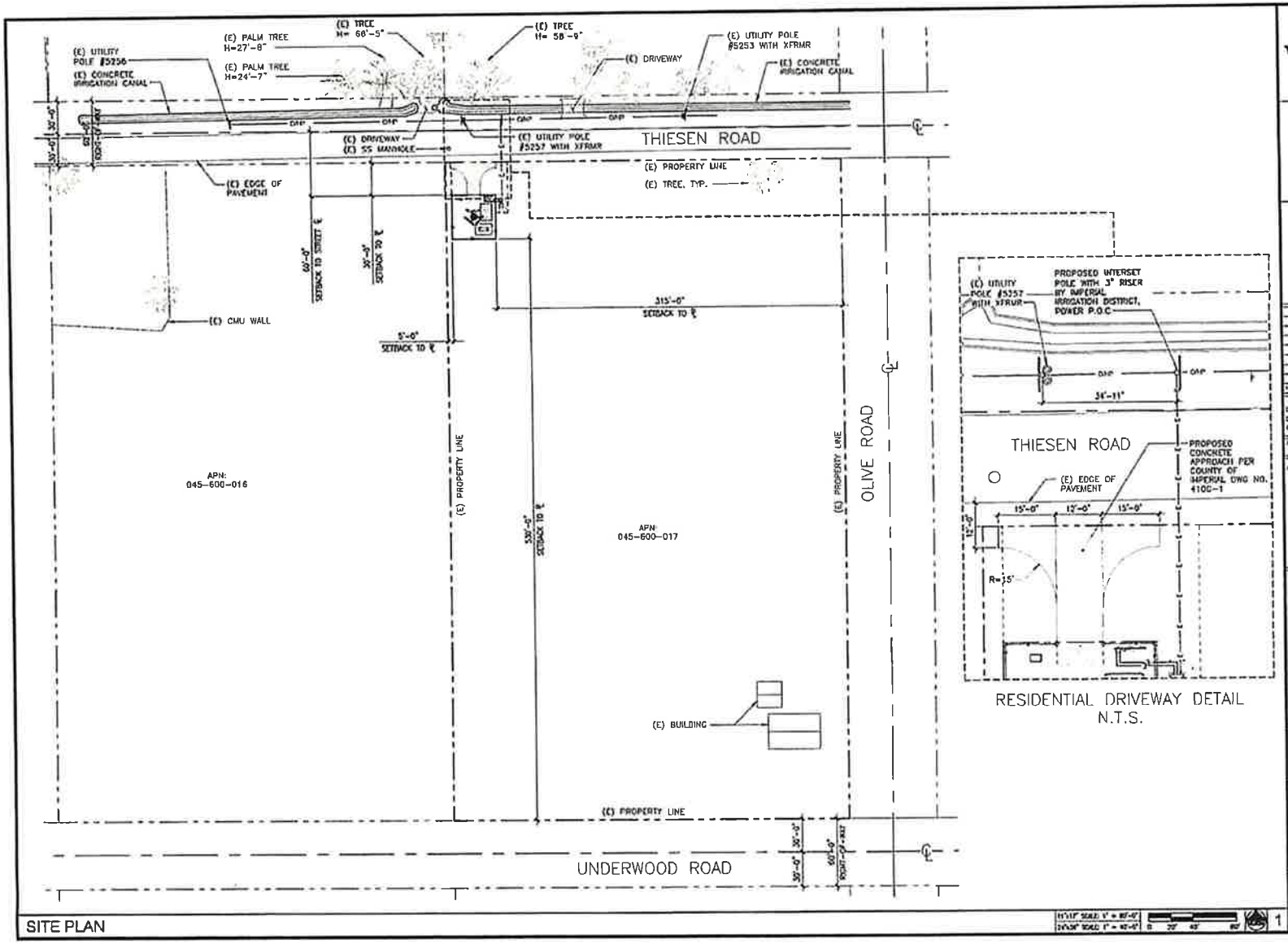
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TITLE SHEET

DRAWING SCALE: AS NOTED
DATE: 08/30/24
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IT IS A VIOLATION OF LAW FOR ANY PERSON TO ALTER THIS DOCUMENT IN ANY WAY UNLESS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER IN ACCORDANCE WITH APPLICABLE STATE AND/OR LOCAL LAWS.

DRAWING NUMBER:
T1

EEC ORIGINAL PKG
PC ORIGINAL PKG



CLIENT
vertical bridge
250 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 6387

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5078

NO	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	JW	09/30/24
A	REVISED FOR REVIEW	CV	10/18/24

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER # US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE:
SITE PLAN

DRAWING SCALE
AS NOTED
DATE
09/30/24

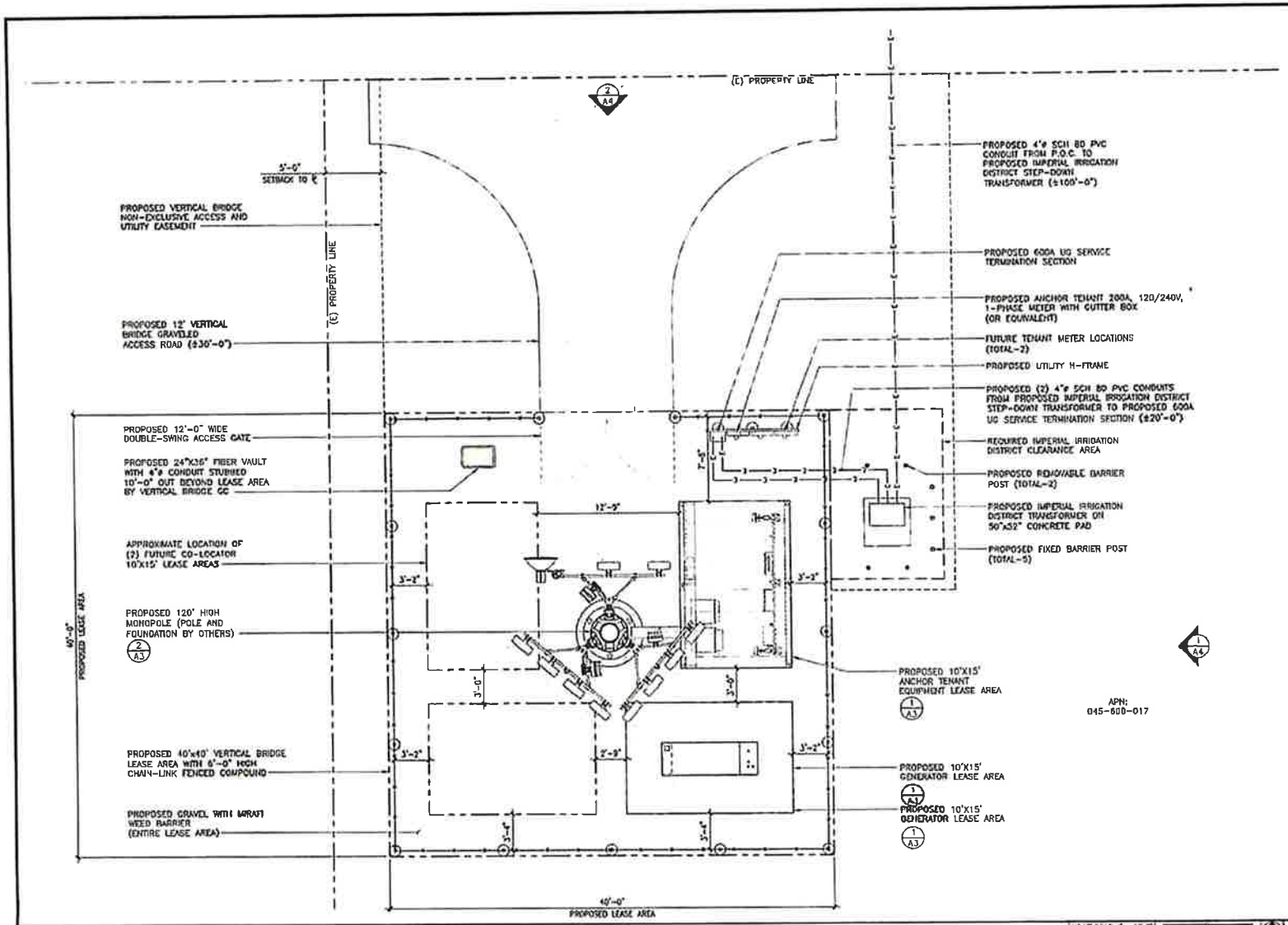
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A1

EEC ORIGINAL PKG

PC ORIGINAL PKG



ENLARGED COMPOUND PLAN

CLIENT
vertical bridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 8307

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5678

0	ISSUED FOR ZONING	JB	09/30/21
A	REVISED PER REVIEW	CM	09/16/21
NO	SUBMITTAL / REVISION	BY	DATE

DRAWN BY: CV
DESIGNED BY: CV
CHECKED BY: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER'S STAMP

DRAWING TITLE
ENLARGED COMPOUND PLAN

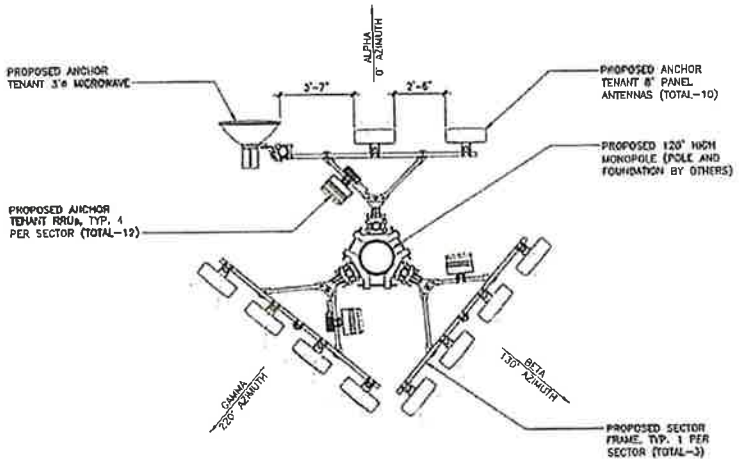
DRAWING SCALE: AS NOTED
DATE: 09/30/21
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DRAWING NUMBER
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EEC ORIGINAL PKG

PC ORIGINAL PKG

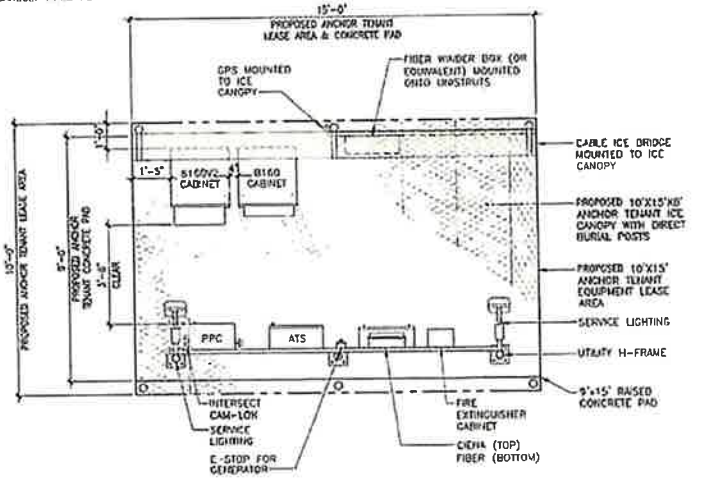


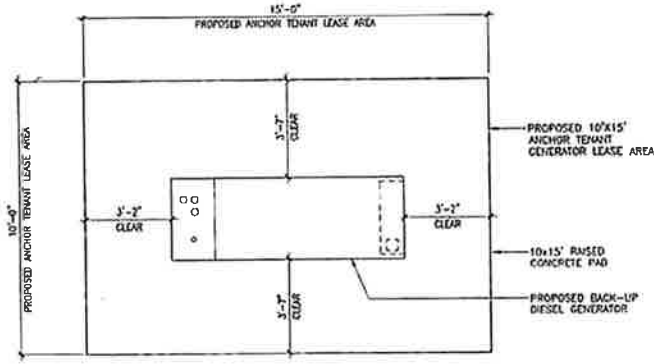
ANTENNA PLAN | 2

NOT USED | SCALE: NTS | 3

SERVICE LIGHTING NOTES:
1. THE SERVICE LIGHT IS MANUALLY SWITCHED ON/OFF BY THE SITE TECHNICIAN IN EMERGENCY SITUATIONS
2. MAINTENANCE OF THE CELL SITES ARE NORMALLY PERFORMED DURING DAY-LIGHT HOURS.
3. THE SERVICE LIGHT SHALL BE POINTED ~45° TOWARDS THE GROUND.

SERVICE LIGHTING SPECIFICATIONS:
MODEL: PLIS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2097 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN | 1

CLIENT
vertical bridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 5387

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1429 HUNTINGTON DR | SUITE 303
SOUTH PASADENA, CA | 91030
626 793 5679

0	SUBMITTAL ZONING	JP	09/10/24
A	ISSUED FOR REVIEW	CV	09/16/24
1	SUBMITTAL REVISION	BM	DATE

DRAWN BY: CV
REVIEWED BY: CV
CHECKED BY: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE
EQUIPMENT AND ANTENNA PLAN

DRAWING SCALE: AS NOTED
DATE: 09/10/24
ZD

UNAUTHORIZED ALTERATION OR ADDITION TO THIS DOCUMENT IS A VIOLATION OF APPLICABLE STATE AND/OR LOCAL LAWS

DRAWING NUMBER
A3

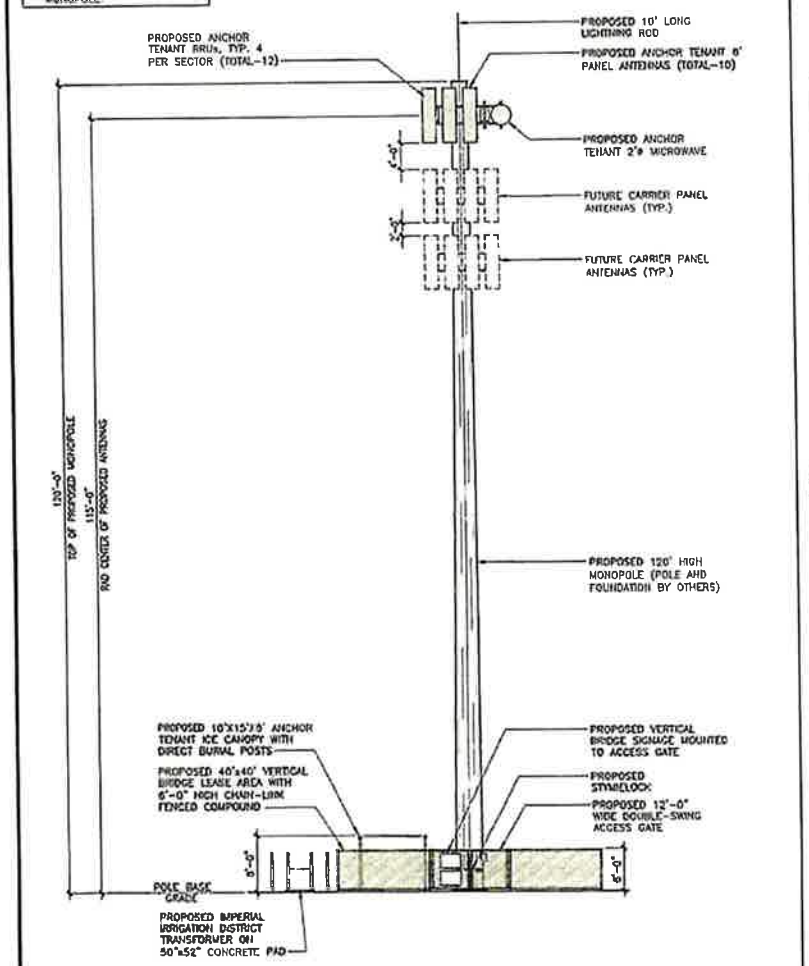
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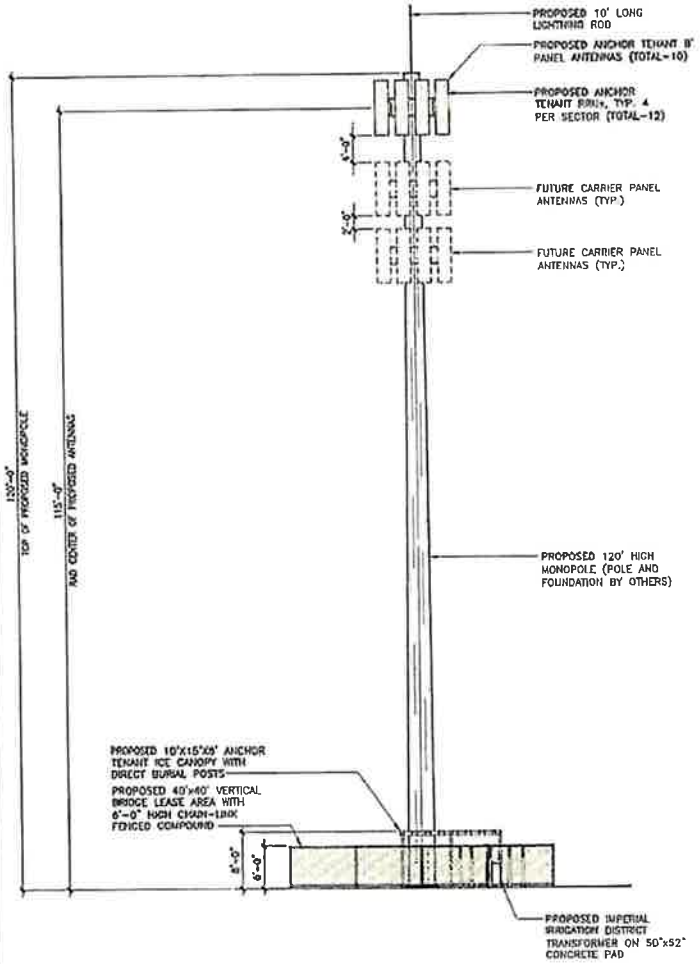
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NOTES:
1. ANTENNAS AND RRUS TO BE PAINTED TO MATCH MONOPOLE



NORTH ELEVATION 2



EAST ELEVATION 1

CLIENT
verticalbridge
750 PARK OF COMMERCE DR
SUITE 200 | BOCA RATON, FL | 33487
561 948 6367

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626 765 5078

NO	SUBMITTAL/REVISION	BY	DATE
B	ISSUED FOR ZONING	JR	09/22/21
A	ISSUED FOR REVIEW	CV	09/16/21

DRAWN CV
DESIGNED CV
CHECKED APP

PROJECT MANAGER

PROJECT TITLE
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

DRAWING TITLE
ELEVATIONS

DRAWING SCALE
AS NOTED
DATE
09/16/21
ZD

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A4

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DEVELOPMENT

Attachment 9

Alternative Sites Analysis

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Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

Prepared By:
Samantha Herrmann, Assurance Development
T-Mobile/Vertical Bridge
2/12/2025

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Summary

A search ring was provided by T-Mobile's Radio Frequency ("RF") Engineer identifying the project's coverage needs. We reviewed this search ring and compared it to existing zoning, development requirements, land uses, and existing parcel conditions. After this review, we identified multiple properties as potential sites. Locating outside of this search area would not meet T-Mobile's coverage goals; and therefore, sites outside of the search ring were not considered.

The Imperial County code requires that the alternative analysis shall include (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County.

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Collocation on Existing Towers

Whenever possible, T-Mobile seeks to construct new sites on existing infrastructure before proceeding with the construction of a new free-standing facility. Before allocating a search area to an infrastructure provider like Vertical Bridge, T-Mobile conducts thorough research, ensuring all collocation opportunities are explored and exhausted. There are three existing towers within the determined search radius. These towers are limited in the opportunities to co-locate, and they do not offer the height required to meet T-Mobile's coverage objectives for this tower. It was determined that collocating an existing tower was not a feasible alternative, and further analysis is included in the table below.

Collocation on Existing Non-Tower Structures @ 119' antenna tip height AGL

There are no structures within the search area that can support the required height of 119' to meet the coverage objectives for this tower. The buildings in this area are residential structures at heights ranging from 20'-30'.

These structures cannot support a tower at the required height while meeting the requirements set forth in Code Section 92401.04(5)(d): "No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted, unless facility is fully screened and height does not exceed height permitted by applicable zoning code." Therefore, Applicants have proposed to locate a freestanding monopole tower at 1734 E Underwood Rd.

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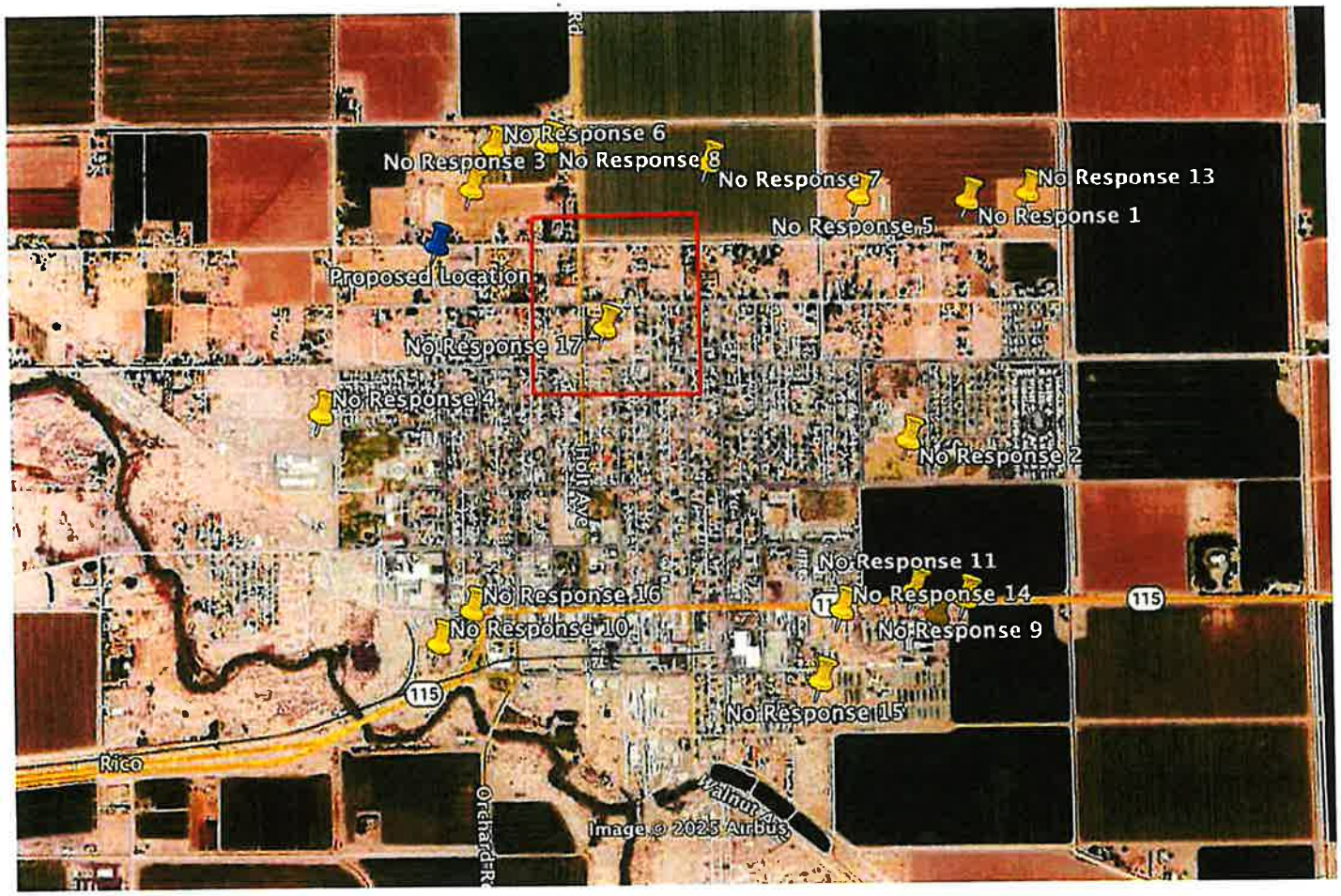
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T-Mobile Alternative Candidates Map



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EEC ORIGINAL PKG

Property Owners Contacted – No Response



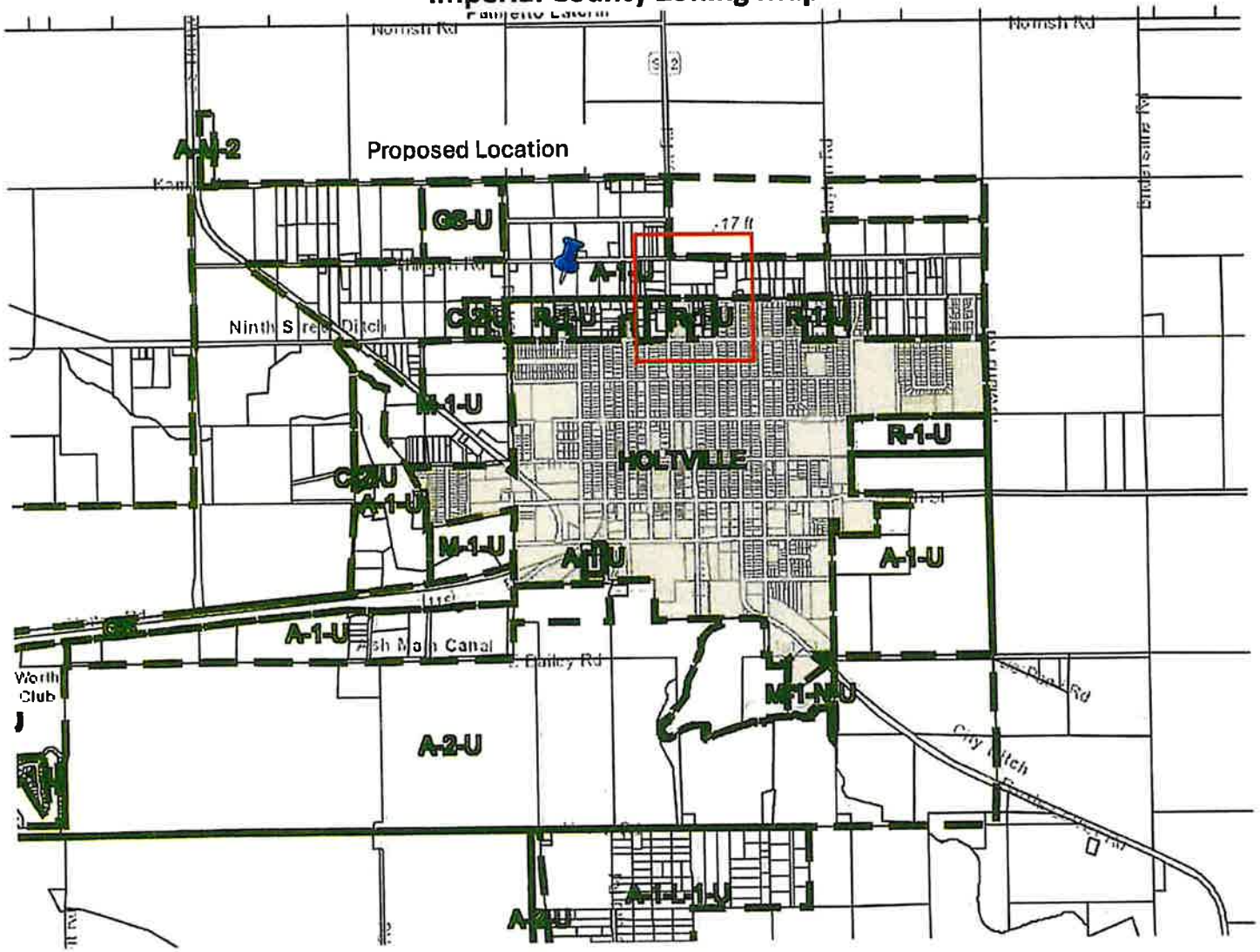
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EEC ORIGINAL PKG

Existing Towers within Search Ring



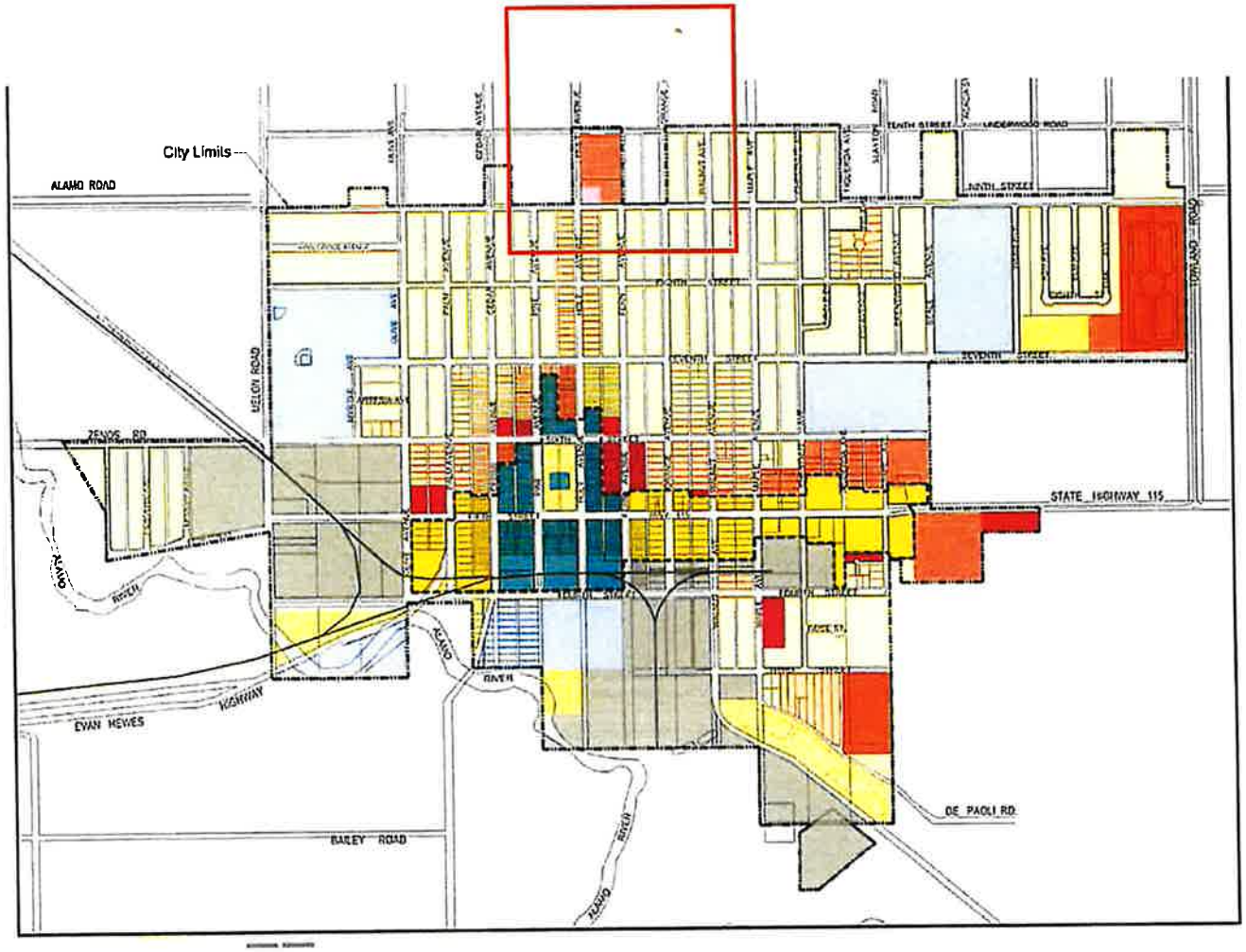
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Imperial County Zoning Map



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EEC ORIGINAL PKG

City of Holtville Zoning Map



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EEC ORIGINAL PKG

Alternative Analysis Summary - Collocations

	Location	Distance to Proposed Location	Feasible? (Y/N)	Summary
Collocation on Existing Towers				
1	32.8127, -115.3882	Approx. 0.6 Miles	N	This approx. 80' Microwave tower is owned by the Imperial Irrigation District, Telecommunications Section. The height of the tower does not meet the T-Mobile's coverage requirements.
2	32.8087, -115.3823	Approx. 0.9 Miles	N	This Water Tank tower, at approx.100', limits the opportunity to collocate, as there is restricted space inside the water tank portion, and additional antennas often need to be installed on the legs of the tower. The silhouette of the water tank design then becomes less aesthetically appealing.
3	32.8033, -115.3744	Approx. 1.4 Miles	N	T-Mobile has existing equipment located at this site. The proposed location would contribute to T-Mobile's coverage of Holtville.
4	32.81150833, -115.404900	Approx. 1.3 Miles	N	This lattice tower is outside of the desired coverage area and would not provide sufficient coverage to Holtville.

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EEC ORIGINAL PKG

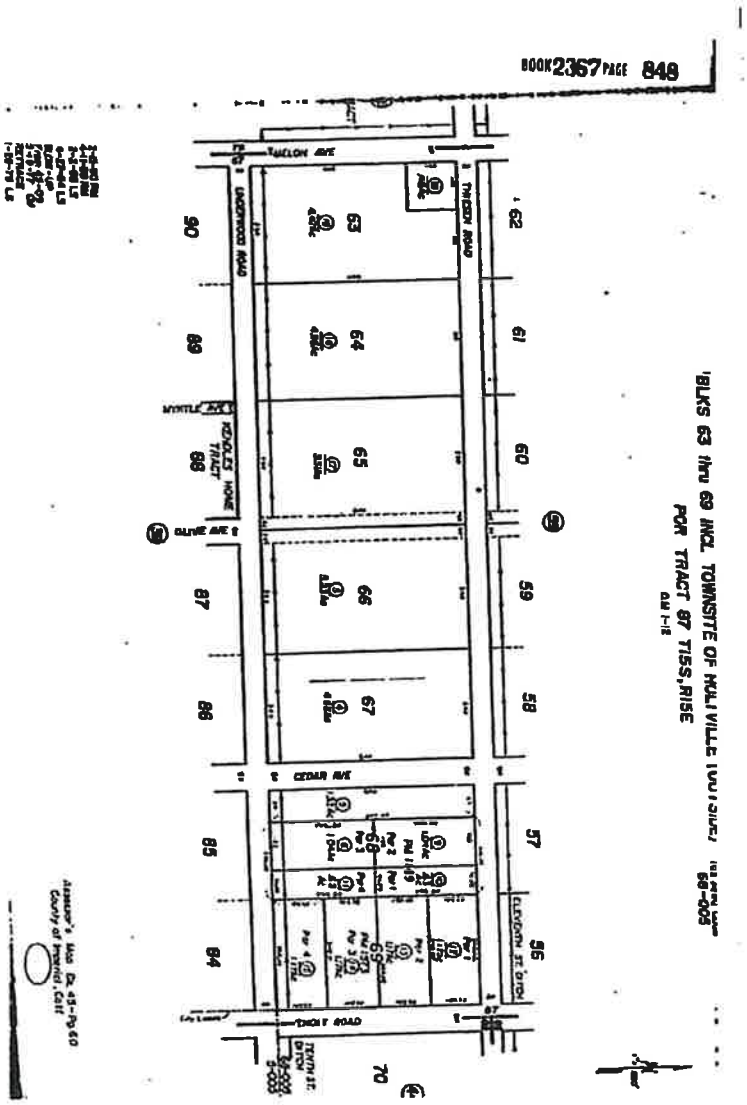
ASSURANCE
DEVELOPMENT

Attachment 10

Assessor's Parcel Map

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Attachment 13

Photo Simulations

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AERIAL MAP



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DRAFTLINK

ASSURANCE DEVELOPMENT

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0	1/04/2025	ISSUED FOR SUBMITTAL	JSV

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
A	1 / 4

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PC ORIGINAL PKG

AERIAL MAP

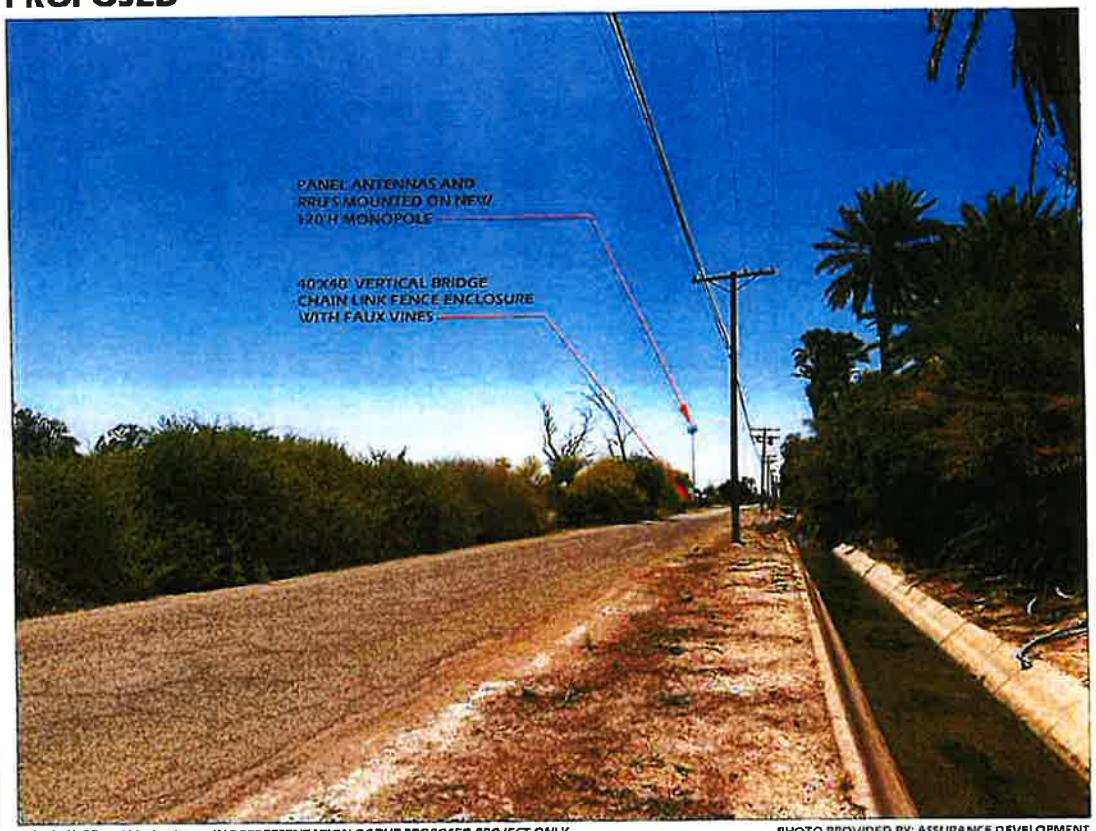


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DRAFTLINK	ASSURANCE DEVELOPMENT	NO.	DATE	REVISION	BY	US-CA-5363 HOLTVILLE 1734 E UNDERWOOD ROAD HOLTVILLE, CA 92250	VIEW B	SHEET 2 / 4
		0	1/04/2021	ISSUED FOR SUBMITTAL	JFV		

verticalbridge

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PC ORIGINAL PKG

AERIAL MAP

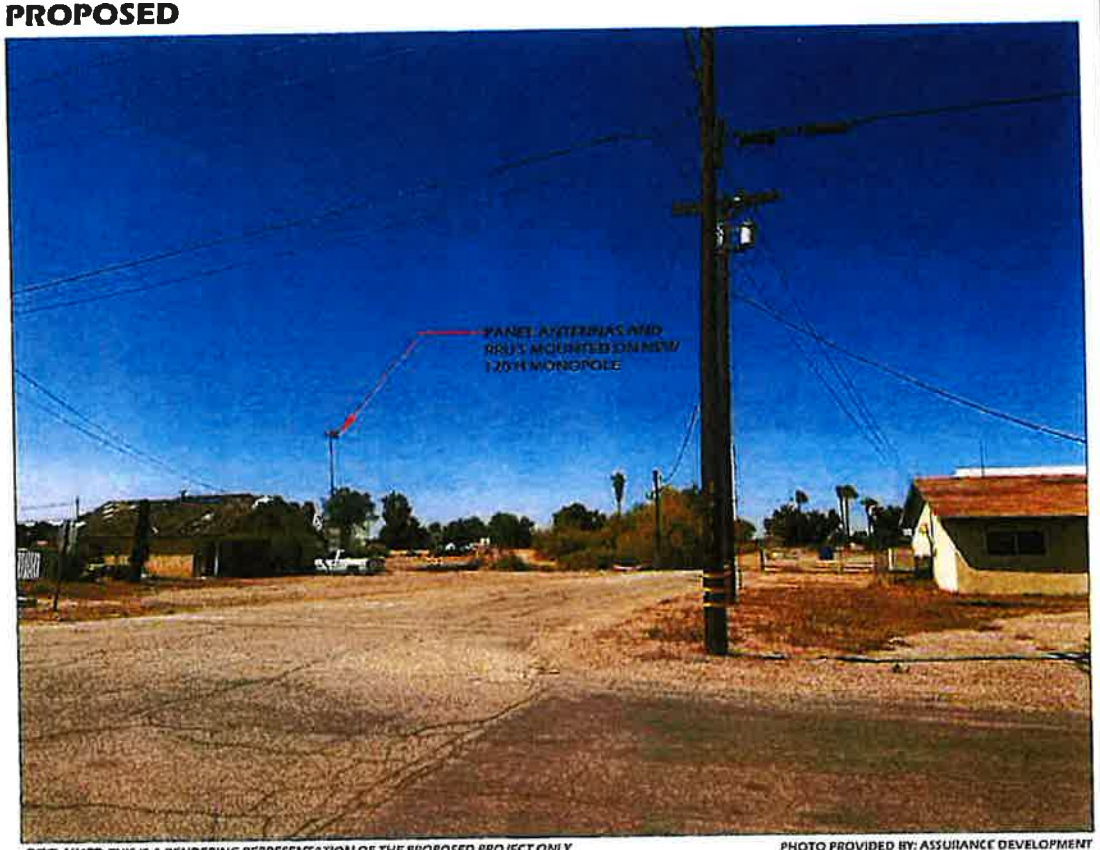


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US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
C	3 / 4

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PC ORIGINAL PKG

AERIAL MAP



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US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
D	4 / 4

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ASSURANCE DEVELOPMENT

Attachment 14

Equipment Specifications

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AIR 6419 B41



AIR 6419, an Advanced Antenna System (AAS) with 64 transmitters and 64 receivers, improves upon previous generations of product with respect to energy efficiency and deployment capabilities. An Advanced Antenna System (AAS) such as AIR 6419 together with the Massive MIMO and Multi-User MIMO software features enables greater spectral efficiency. Enhanced bitrate per user achieved through interference suppression by applying beamforming capabilities in the downlink and the uplink.

Capacity increased by scheduling users in the cell on different layers supporting both Single User MIMO (SU-MIMO) and Multiuser MIMO (MU-MIMO). Application coverage is improved through beamforming in both the vertical and horizontal dimensions.

To support cost efficient site deployments, AIR 6419 includes Layer 1 beamforming enabling enhanced Common Public Radio Interface (eCPRI) to be used between the AIR 6419 and RAN Compute portfolio products. The increasing capacity demands in operator's networks create needs for new spectrum efficient solutions.

Like its predecessor AIR 6449, AIR 6419 supports different cell or broadcast beam shapes, to meet different user distribution scenarios. The flexibility to steer the transmitted energy for control signaling in both azimuth and elevation enables improved efficiency in various deployments scenarios including Macro, Hotspot and High-rise.

The improved design of AIR 6419 enables faster roll out with minimal site impact, improved mid-band coverage and capacity boost for both existing and new bands compared to the use of traditional radio and antenna systems.

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PC ORIGINAL PKG

TECHNICAL SPECIFICATIONS AIR 6419 B41

PRODUCT NUMBER:	KRD 901 212/11	
ADVANCED ANTENNA SYSTEM		
Operating frequency band:	3GPP Band 41, 2496 – 2690 MHz (full band)	
Instantaneous bandwidth:	194 MHz	
Output Power	320 W	
EIRP max.	79 dBm	
Antenna configuration	(3x1) x (4x8)	
Architecture:	64T64R connected to an array of dual polarized antenna elements.	
Modulation:	Downlink	Up to 256 QAM.
	Uplink	Up to 64 QAM.
Multi-antenna beamforming functionality*:	Downlink SU-MIMO	
	Downlink MU-MIMO	Up to 16 layers per carrier.
	Uplink SU-MIMO	
	Uplink MU-MIMO	Up to 16 layers per carrier.
	Cell shaping	Pre-defined cell or broadcast beam shapes**; Macro, Hotspot and High-rise.
	Digital down-tilt	Continuously adjustable for macro scenario, fixed for Hotspot and High-rise scenario.
Mechanical specifications*		
Weight:	approx. 37.8 kg (83 lbs) excluding installation kit	
Size (H x W x D):	approx. 921 x 531 x 229 mm (or 36.3" x 20.9" x 9.0") (including protrusions)	
	approx. 894 x 531 x 177 mm (or 35.2" x 20.9" x 7.0") (excluding protrusions)	
Operational specifications*		
Wind Load Maximum:	approx. 650 N (front), 175 N (side) @ 42 m/s wind speed (pole installed)	
Operating Temperature Range:	-40° to + 55° C	
Solar radiation:	≤ 1,120 W/m²	
Relative humidity:	2% to 100%	
Absolute humidity:	0.26 to 40 g/m³	
IP Classification:	IP65	
Main Interfaces		
Baseband:	Two eCPRI interfaces using 25G SFP+ ports with link capacity 25 Gb/s each. One 25 Gb/s eCPRI interface is sufficient for up to 100 MHz carrier bandwidth and 16 layers.	
Power Supply:	-48 V DC (3-wire or 2-wire) via a connector. Maximum fuse rating is 50 A.	
Mounting:	Optional mechanical tilt and swivel installation kit for wall and pole mounting.	
Handling:	Handle for lifting and hoisting.	

* Preliminary Specifications provided

** Additional scenarios, cells or broadcast beam shapes possible with future software releases Refer detailed description for more details on NR and EIRP for specific scenarios

Preliminary PA4
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SE-164 80 Stockholm, Sweden
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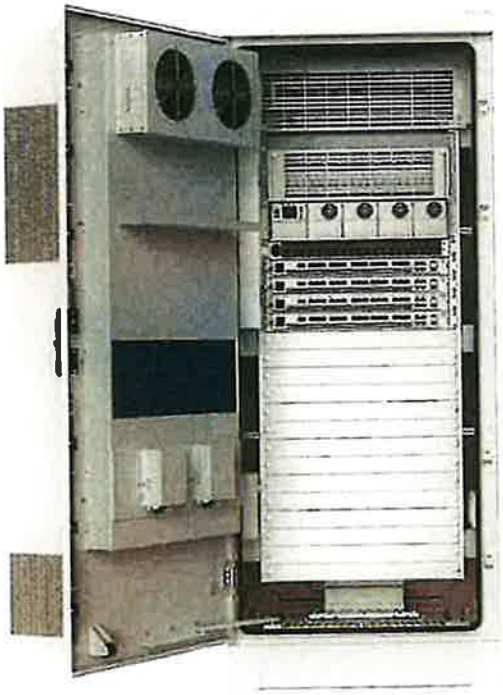
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Enclosure 6160 AC

UTE6160_AC_V2

The Enclosure 6160 is a multi-purpose site cabinet designed to support a multitude of equipment such as ERS Baseband, Transport, Li-Ion battery and 3PP vendor equipment. It also provides a highly capable power system and battery back-up - all in a streamlined design and minimized footprint to support cost efficient expansion of mobile broadband.



Being an all-in-one enclosure, the Enclosure 6160 is a very fitting choice for all types of sites where the capacity need is large or room for future expansion is needed. It is ideally used for modernizing existing sites or in greenfield scenarios to match both current and future needs.

With a robust design, IP65 compliance and a sealed Heat Exchanger (HEX) climate system the Enclosure 6160 ensures optimal environmental protection of the active equipment - enabling them for a long-lasting service. The complete system is also integrated and verified for the entire Ericsson Radio System and ensures best-in-class service.

The power system offers 31,5kW of power in total and provides 24kW of -48V DC power for both internal and external consumers.

The equipment space allows 19U of rack space ensuring well enough capacity for existing need and future expansion.

One of the main advantages of the Enclosure 6160 is its default integration with ENM - allowing for advanced remote monitoring and control such a fault management (alarms), inventory management and performance measurements. The cabinet also provides an open O&M interface for integration to 3PP O&M systems.

EEC ORIGINAL PKG

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Technical specification for Enclosure 6160 AC V2

CAPACITY	
Rack space user equipment	19U (19" rack) (excluding Compact DCDU)
Hardware capabilities	ERS Baseband and Transport units Power and CPRI support for multi-standard remote radios (RRU or AIR) Li-Ion batteries (19" form factor) 3PP equipment
MECHANICAL SPECIFICATION	
Weight	197 kg (433 Lbs) (excluding user equipment & Rectifier modules. Includes cDCDU, Fiber storage, L-supports & 1U air restrictor plates, etc)
Dimension (H x W x D)	1600 x 650 x 650 mm (includes 4" Base frame) - Foot print 1600 x 650 x 850 mm (includes 4" Base frame) - Includes door 63 x 26 x 26 in. (includes 4 "Base frame) - Foot Print 63 x 26 x 33 in. (includes 4 "Base frame) - Includes door
Base frame height & Weight	4 in. (Ordered seperately and not part of the main cabinet), 17 Kgs 12 in. (Ordered seperately and not part of the main cabinet), 34kg
Rectifier Weight	1.7 Kgs (each) - Configurable from 1 to 9
Mounting position	Ground
Enclosure material	Aluminum
Color	Power paint NCS 2002-B
Door	Front access
Rack type	19" (IEC 60297-3-100)
Locking type	Pad lock or Cylinder
POWER SYSTEM	
Input voltage	3P+N+PE: 346/200-415/240 VAC 2P+N+PE: 208/120-220/127 VAC 1P+N+PE: 200-250 VAC
Cabinet AC Power Rating	250 A (2 x 125 A)
Input power	<33kW
Output load (-48VDC)	24kW (Max user load)
Total capacity (-48VDC)	31.5kW
AC SPD	Class 2/Type 2
DC SPD	Class 2/Type 2
PSU Slots	9x
Service outlet	Optional
Priority load	8x Circuit Breaker
LLVD 1	6x Circuit Breaker
LLVD 2	6x Circuit Breaker
CB ratings (Bullet Style) - default	3A / 5A / 10A / 15A / 20A / 25A / 30A / 40A / 50A / 60A / 80A / 100A
T-Mobile Bullet Style CB combinations	6x 40A, 1x 100A, 1x 200A, 2x 300A
Battery Interface	2x Circuit Breaker
Battery Circuit Breaker rating	125A 2pol (200A)

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PSU capacity	3500W
PSU efficiency	96%
PSU output voltage (nominal)	-48VDC
PSU rated current	73A
PSU power factor	≥0.99
PSU emissions	EN 55022 Class B
Ingress protection power system	IP20
DC Distribution Unit – T-Mobile config	
Output load (-48VDC)	9kW
CB slots	20x
CB ratings	4x 6A, 4x 10A, 8x 20A

ENVIRONMENTAL SPECIFICATION

Ingress protection	IP65
Environment	Class 1.2 (Storage) Class 2.3 (Transport) Class 4.1 (Operation) ETSI EN 300 019-1-1
Relative humidity	15-100%

CLIMATE SYSTEM

Type	Heat Exchanger
Temperature range	-33°C to +50°C* -27°F to +122°F*
Cooling capacity (Total)	3700W
Heater	2x 500 Watts
Smart OAM	Hardware prepared for FM, PM & Inventory data
Acoustic Noise (dB)	70 dB average @ full load @ Horizontal distance of 1.5 M and vertical distance of 1 Meter

STANDARDS COMPLIANCE

	UL 62368-1, UL 60950-22, UL 50E Telcordia GR-63-CORE Telcordia GR-487-CORE Telcordia GR-1089-CORE

CABLE I/O

Entry point	Bottom
Plinth cable access	Rear and side access
General	1x Ø16-35mm
DC Out (shielded)	18x Ø10-18mm
DC In (battery feed)	4x Ø19mm
Signal Cable Outlet	10x Ø10mm
Signal Cable Inlet	8x Ø6mm
Optical	22x Ø6mm
Conduits knock-out plates	6x Ø2"
Punched holes	3x Ø26mm

REMOTE MANAGEMENT

External Alarms (Dry Contact)	32x
Smart Alarms	Hardware Prepared
Controller interface northbound	IP / Electrical Ethernet
FM, PM, CM & IM	Please refer to Controller 6610 Datasheet

*Configuration dependent – please refer to CPI

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PC ORIGINAL PKG

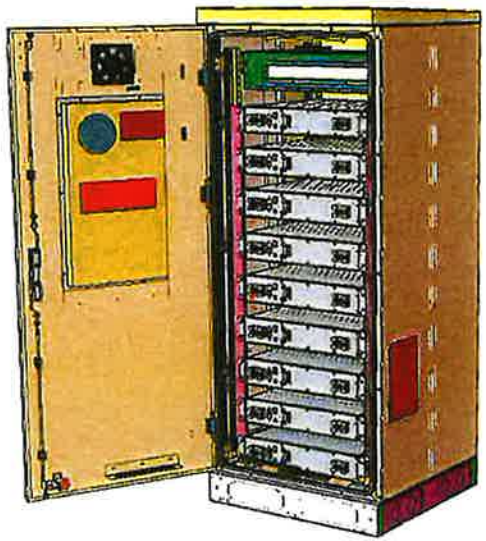
Enclosure B160



Enclosure B160
AirCon + VRLA



Enclosure B160
AirCon + Li-Ion



Enclosure B160
Convection Cooling
+ VRLA

EEC ORIGINAL PKG
PC ORIGINAL PKG

Enclosure B160

Capacity
- VRLA 12V: 100Ah / 150Ah / 170Ah / 190Ah / 210Ah
- Li-Ion: 24U 19" / 23"
- Sodium-Nickel: 3x FIAMM

Electrical specification
- DC Output: -48VDC/200A
- Battery breakers: 2x 125/2p
- Alarms: Door open, Climate failure, MCB Connection

Mechanical specification
- Weight: 134kg
- Dimensions: 63 x 26 x 26 in. (incl. Base frame)
- Base frame height: 6 in.
- Material: Galvanized steel (180g/m^2)
- Color: Powder paint NCS 2002-B
- Door: Front access
- Locking type: Pad lock / cylinder

Environmental specification
- Ingress protection: VRLA/Sodium IP44
Li-Ion IP55
- Relative humidity: 15-100%

Climate system
- Air Conditioner
  - Fan type: DC
  - Cooling capacity: 500W @L35/L35
- Convection cooling
  - Emergency fan

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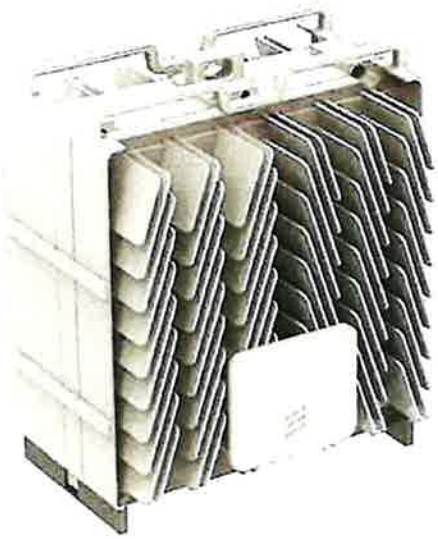


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PC ORIGINAL PKG

ERICSSON

Radio 4460



Product features
Radio 4460 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x140 W in total and up to 4x80 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4460 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

Radio 4460 provides support for AISG TMA and RET towards the antenna system.

It supports GSM, WCDMA, LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT) with GSM in mixed mode.

Radio 4460 also supports up to 4 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

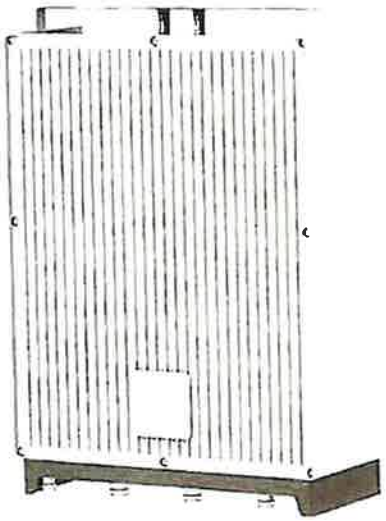
Rev A

EEC ORIGINAL PKG

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Radio 4480



Product features
Radio 4480 is an outdoor 4T/4R FDD dual-band radio with 4 antenna ports. The output power is 4x100 W in total and up to 4x60 W per band.

It offers the best in class design when it comes to radio performance and power efficiency for wide area 3GPP radio products.

With Radio 4480 Ericsson evolves the macro radio part of the portfolio to become even more flexible and making it easier than ever to make small and efficient single and multi-band macro radio installations.

Radio 4480 provides support for AISG TMA and RET towards the antenna system.

It supports LTE, New Radio (NR), and Narrowband Internet of Things (NB-IoT).

Radio 4480 also supports up to 2 CPRI ports (2.5, 5.0, 9.8, 10.1 Gbps) allowing mixed mode operation as well as cascade or star connection configuration of radio units. It also supports AISG TMA and RET through RS-485 or RF connectors

Rev A

EEC ORIGINAL PKG

PC ORIGINAL PKG

TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4480 **PRODUCT NUMBER: KRC 161 922/1**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 71 and Band 85A

HW CAPACITY:
IBW: Up to 35 MHz in B71, Up to 17 MHz in B85A
MIMO: Yes, 4T/4R
Output power: Up to 4 x 60 W in B71, Up to 4 x 60 W in B85A. Up to 100 W in total

INTERFACE SPECIFICATIONS:
Power supply: 1 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 1, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 42 kg (93 lbs)
Volume: approx. 41 l (11 gal)
Dimensions (HxWxD): 553mm x 398mm x 190mm (21.8"x15.7"x7.5") (incl. protrusions)
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65 .
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

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EEC ORIGINAL PKG

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TECHNICAL SPECIFICATION

PRODUCT NAME: Radio 4460 **PRODUCT NUMBER: KRC 161 912/3**

FUNCTION DESCRIPTION

FREQUENCY BANDS:
3GPP FDD Band 2/25 and Band 66

HW CAPACITY:
IBW: Up to 65 MHz in B2/25, Up to 90 MHz in B66
MIMO: Yes, 4T/4R
Output power: Up to 4 x 80 W in B2/25, Up to 4 x 80 W in B66. Up to 140 W in total

INTERFACE SPECIFICATIONS:
Power supply: 2 x DC -48 VDC 3-wire (3-wire to 2-wire via DC power adapter)
Antenna Ports: 4 x 4.3-10(f)
External ALD: RET2.0, using DIN 8 or over the antenna port
AISG TMA & RET support
External Alarm: 4, using DIN 14
CPRI: 4 x 2.5/5/9.8/10.1 Gbps (exchangeable SFP modules)
MMI: Maintenance button
Grounding: Field Ground, dual lug

MECHANICAL SPECIFICATIONS:
Weight: approx. 49.5 kg (109 lbs)
Volume: approx. 50 l (13 gal)
Dimensions (HxWxD): 432mm x 384mm x 301mm (17.0 x 15.1" x 11.9")
Mounting: Wall and Pole mount is supported

ENVIRONMENTAL SPECIFICATIONS:
Environment: Outdoor class with IP65
Normal operating temp.: -40 - +55 °C (cold start at -40 °C)

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ASSURANCE DEVELOPMENT

Attachment 15

T-Mobile Coverage Maps

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REGIONAL NETWORK ENGINEERING & OPERATIONS

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COVERAGE & CAPACITY OBJECTIVES ENGINEERING JUSTIFICATION

US-CA-5363 Holtville

12/27/2024

Prepared by: Alexandre Renaldino



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PREDICTION TOOL OUTPUT
SERVICE WITH THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

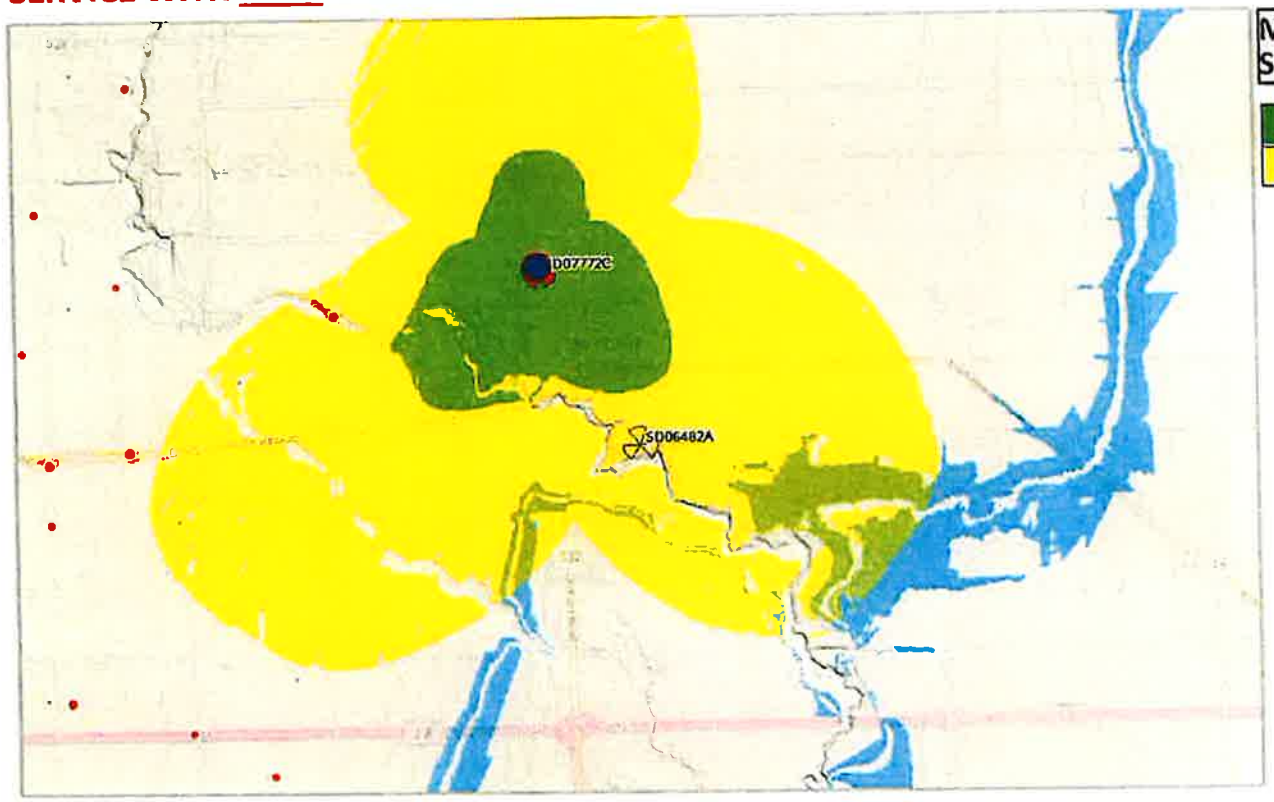
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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PREDICTION TOOL OUTPUT
SERVICE WITH ONLY THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

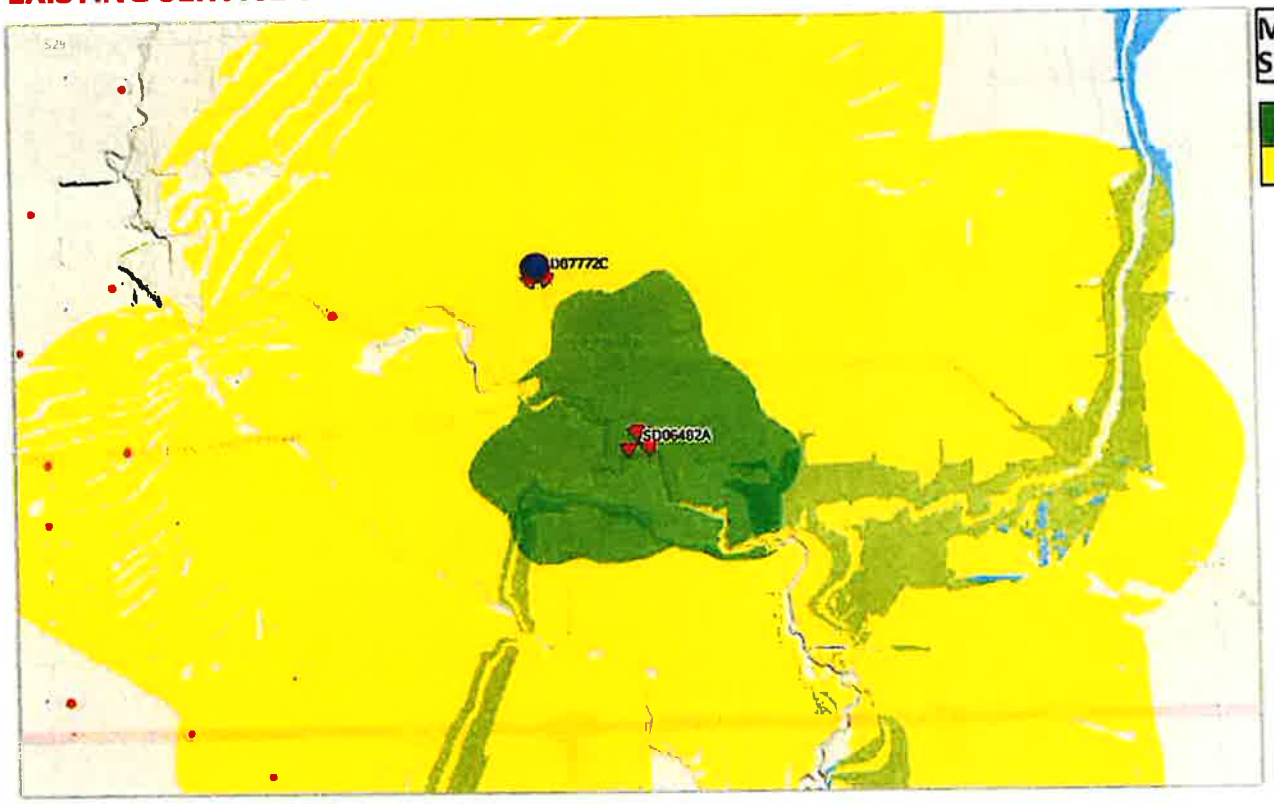
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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PREDICTION TOOL OUTPUT
EXISTING SERVICE WITHOUT THE PROPOSED SITE



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

● Proposed New Facility

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ASSURANCE DEVELOPMENT

Attachment 16

EME Report

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RADIO FREQUENCY - ELECTROMAGNETIC ENERGY (RF-EME) COMPLIANCE REPORT

Report Type: Antenna Modification/Theoretical

Site ID: SD07772C

Site Name: SD07772C

Address: 1734 E Underwood Rd, Holtville, CA 92250

Date of Calculation: January 14, 2025

Date of Report: January 14, 2025

Latitude: 32.821699 N
Longitude: -115.38638 W



Prepared By:

GTA
Global Technology Associates
Solutions for a Wireless World

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1.0 Executive Summary / Report Summary

Purpose of Report

Global Technology Associates (GTA) has been contracted by T-Mobile to conduct radio frequency electromagnetic (RF-EME) modeling for T-Mobile site **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250** to determine RF-EME exposure levels from existing and proposed T-Mobile wireless communications equipment at this site.

This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields. This report contains a detailed summary of the RF-EME analysis for the site.
As described in greater detail in the Section titled **"Federal Communications Commission (FCC) Requirements"** of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general population exposures and occupational exposures. This report summarizes the results of RF-EME modeling to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

T-Mobile Site Summary			
Site ID	**SD07772C**	Street Address	**1734 E Underwood Rd,**
Site Name	**SD07772C**	City, State, Zip	**Holtville, CA 92250**
Site Type	**monopole**	Latitude	**32.821699 N**
Classification	**general population**	Longitude	**-115.38638 W**
Access Restrictions	**uncontrolled**	Access Type	**wide double swing gate**
Site Description	**all the antennas are mounted on the monopole**		
Max Predictive RF-EME at T-Mobile Facility (General Population)	**8.6% of FCC's general population limit at ground level**		
Max Predictive RF-EME at Ground Level (General Population)	**8.6% of FCC's general population limit**		
Predictive RF-EME Analysis at T-Mobile Facility	**The Proposed Antenna Configuration is In Compliance With FCC Rules & Regulations Upon Completion of the GTA Recommendations.**		

Table 1

A result of over 100% does not make a site out of compliance with FCC guidelines. For predicted EME over 100% of the applicable FCC limit, further remediation (e.g. signage and/or barriers preventing access) is required to consider the site compliant. Areas exceeding the FCC limit are presented with the barriers and appropriate signages. Accessible areas outside the demarcated are the safety zones that have predicted EME values below the FCC's limits. Installation of the recommended mitigation or remediation measures brings the site into compliance. The predictions model antennas as if they are operating at full power, and this assumption yields a worst-case scenario with more conservative results. On-site measurements may yield different results, as antennas do not always operate at full capacity.

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Site ID: SD07772C

Methodology

The site to be determined as the compliance is based on theoretical modeling using the RoofView® modeling tool, appropriate RF signage placement recommendations, proposed antenna inventory as provided by T-Mobile in the construction drawings and the type & level of restricted access to the antennas at the site.

Compliance Statement

T-Mobile's operation at **1734 E Underwood Rd, Holtville, CA 92250** will comply with FCC rules and regulations upon completion of recommendations that include the installation of appropriate RF Safety Signages and/or Barriers as described in Section 8.

Actions for Site Compliance

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance. If required, RF alert signage recommendations have been proposed based on theoretical analysis of MPE levels. Where applicable, barriers can consist of locked doors, fencing, railing, rope, chain, paint striping or tape, combined with RF alert signage.

T-Mobile will be compliant when the following changes are implemented:

T-Mobile proposed Access Point Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Access Point location, as depicted in the site map in the later sections of the report.

T-Mobile proposed Alpha Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Beta Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

T-Mobile proposed Gamma Sector Location

1 Caution sign on the antenna as depicted in the site map in the later sections of the report.
There is no need to install Barrier & Chain/Striping/Tapes enclosing this sector.

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Site ID: SD07772C

T-Mobile proposed Equipment/BTS Location

Ensure that a 1 Guideline, 1 Information & 1 Notice signs are installed at the Equipment/BTS location, as depicted in the site map in the later sections of the report.

2.0 MPE Calculations

For this MPE predictive analysis, GTA considered the area around the accessible areas of the T-Mobile antennas on the site to determine EME field strength levels for the FCC's human exposure limits. Further GTA has identified any areas with higher levels exceeding FCC MPE limits and then determined spatially averaged field levels in areas with highest fields.

GTA has utilized computer-generated modeling software RoofView® 4.15 to generate the compliance report.

Modeling & Input Assumptions

In this Site Compliance Report, it is assumed that

- All antennas are operating at full power at all times.
- The Antenna Inventory Table (Section 3) shows all transmitting antennas at the site.
- A 100 % duty cycle and maximum radiated power for each antenna is assumed unless T-Mobile has specified otherwise.
- Obstructions like (screens, trees, buildings, etc.) that would normally attenuate the signal are not taken into account.
- GTA obtained information used in this Compliance Report from T-Mobile which is considered reliable and believes it to be true and correct.
- Due to the complexity of some wireless sites, GTA performed this analysis and created this report utilizing best industry practices and due diligence. The scales and the determinations are based on the A&E drawings provided by T-Mobile.
- On a case-by-case basis, appropriate static gains and losses are considered while doing the simulations to simulate the closest field radiations of the antennas.

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3.0 Antenna Inventory

ID	Technology	Antenna Make	Antenna Model	Azimuth (°)	Bottom of ANT from Ground (ft)
S1A1	L600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N600	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L700	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N1900	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	L2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A1	N2100	RFS	APXVAALL24_43-U-NA20	0	112.00
S1A4	N2500	ERICSSON	AIR6419 B41	0	116.90
S2A2	L600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N600	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L700	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N1900	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	L2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A2	N2100	RFS	APXVAALL24_43-U-NA20	130	112.00
S2A5	N2500	ERICSSON	AIR6419 B41	130	116.90
S3A3	L600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N600	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L700	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N1900	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	L2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A3	N2100	RFS	APXVAALL24_43-U-NA20	220	112.00
S3A6	N2500	ERICSSON	AIR6419 B41	220	116.90

Table 2

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4.0 Federal Communications Commission (FCC) Requirements

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radio frequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general population.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is transient as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

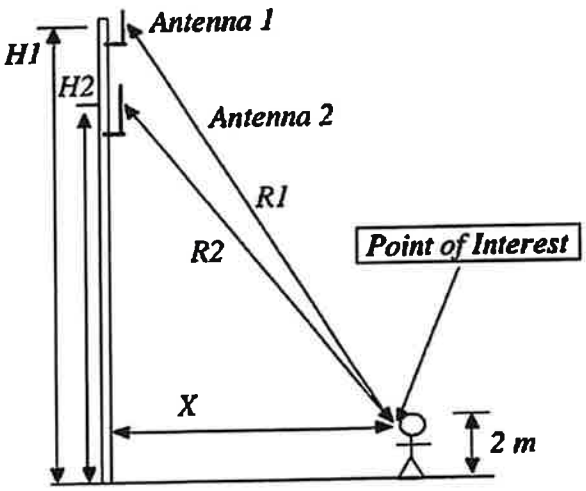


Figure 1

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Table 3 and Figure 2 (below), which are included in the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm2) and an uncontrolled MPE of 1 mW/cm2 for equipment operating in the 1900 MHz frequency range. For the T-Mobile equipment operating at 800 MHz, the FCC's occupational MPE is 2.66 mW/cm2 and an uncontrolled MPE of 0.53 mW/cm2. These limits are considered protective of these populations.

(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ^{2})	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ^{2})*	6
30-300	61.4	0.163	1	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6
(B) Limits for General Population/Uncontrolled Exposure				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ^{2})	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	1842/f	2.19/f	(180/f ^{2})*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

Table 3

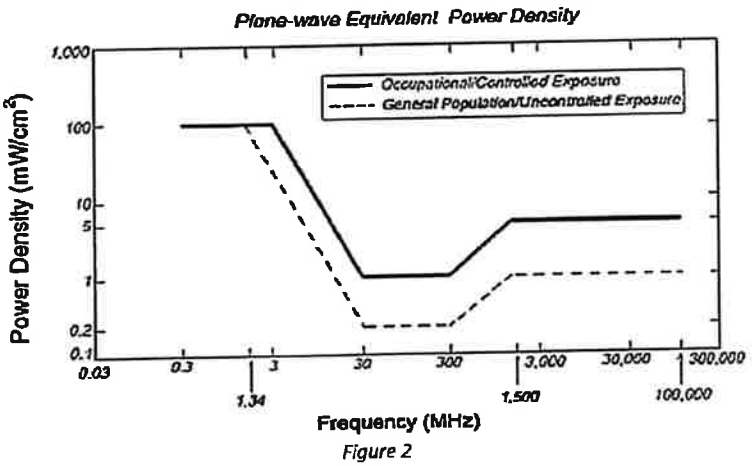


Figure 2

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Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Most Restrictive Freq. Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

Table 4

Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Facilities typically consist of:

1) Electronic transceivers (the radios or cabinets) connected to wired telephone lines; and
2) Antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, except in areas directly in front of the antennas.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 100% of the applicable MPE must participate in mitigating these RF hazards.

5.0 Limitations

This report was prepared for the use of T-Mobile. It was performed following generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under similar circumstances. The conclusions provided by GTA are based solely on the information provided by T-Mobile. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to GTA so that our conclusions may be revised and modified, if necessary. This report has been prepared by Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

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6.0 Safety Recommendations

Occupational Safety and Health Administration (OSHA) Requirements

OSHA requires that those in the Occupational classification must complete training in RF Safety, RF Awareness, and Utilization of Personal Protective Equipment. OSHA also provides options for Hazard Prevention and Control:

Hazard Prevention	Control
• Utilization of good equipment • Enact control of hazard areas • Limit exposures • Employ medical surveillance and accident response	• Employ Lockout/Tag out • Utilize personal alarms & protective clothing • Prevent access to hazardous locations • Develop or operate an administrative control program

Table 5

RF Signage and Barriers

All RF signs should be obeyed by at all times.



Figure 3

If there are workers in an area with a sign that they do not understand, they can call the NOC Number at 877-611-5868 for guidance.

7.0 Federal Communications Commission (FCC) Limits

Contribution to Co-Located areas

Any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance. All co-located sites should have a separate 5% modeling that shows only T-Mobile antennas transmitting. This separate modeling indicates T-Mobile's contribution in all areas that is recognized to be greater than 100% MPE limits.

Occupational Limits

Apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure.

General Population limits

Apply in situations in which the general population may be exposed, or in which persons who are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure. (Those without significant and documented RF Safety & Awarenesstraining)

Controlled Environment

This applies to environments that are restricted or "controlled" to prevent access from members of the General Population classification.

Uncontrolled Environment

This applies to environments that are unrestricted or "uncontrolled" that allow access from members of the General Population classification.

Generic Values

The use of "Unknown" for an operator means the information about the carrier, their FCC license, and/or antenna information was not available. Generic values are used as estimation for Effective Radiated Power (ERP) and antenna characteristics for unknown antennas.

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8.0 Compliance Measures

The site needs the following mitigation and/or compliance plan.

The compliance determination is based on theoretical modeling, RF signage placement recommendations, proposed antenna inventory and the level of restricted access to the antennas at the site. At the time of our analysis, T-Mobile will be complaint with the FCC rules and regulations, as described in OET Bulletin 65 upon implementation of below remediation and/or compliance recommendations.

On monopole :

Recommendations for Site Compliance	Signages on Access Points, Sectors & Equipment										Enclosing Sectors						
																	
	Guidelines		NOC INFO		NOTICE		CAUTION		WARNING		NOTICE		CAUTION		WARNING		OC Length	GP Length	Striping
Access Point(s)	✓	1	✓	1	✓	1													Striping
Sector Alpha							✓	1											Striping
Sector Beta							✓	1											Striping
Sector Gamma							✓	1											Striping
Equipment/BTS	✓	1	✓	1	✓	1													Striping
Total Signage	2		2		2		3		0		0		0		0		0 sq. ft.	0 sq. ft.	Total =0 sq.ft.

Table 6

CAUTION: - The table above represents EVERY compliance item that MUST be implemented by the carrier at the site location; please see the Site Plan shown in diagram 1.

It is recommended to have periodic inspections of the components that are involved in the radiation of RF energy. Periodic Electromagnetic Emission (EME) measurement should be conducted to reevaluate the RF radiation level at this site.

GTA recommends that T-Mobile and the authorized personal at the site take additional measures to ensure that persons accessing the roof (for example, roofers or other maintenance workers) are informed of areas where RF levels exceed the FCC general population limit and made aware that these areas must be avoided to maintain compliance with FCC requirements. This is important especially when the placement of barriers, striping, taping, or any other positive access control (areas of the roof that exceed the RF levels of the general population limit) is not possible due to the physical construction or constraints or safety measures surrounding the antennas or on the roof like the sloped roof, tiled roof, chimney, steeples, cupolas, hilly terrain, etc.

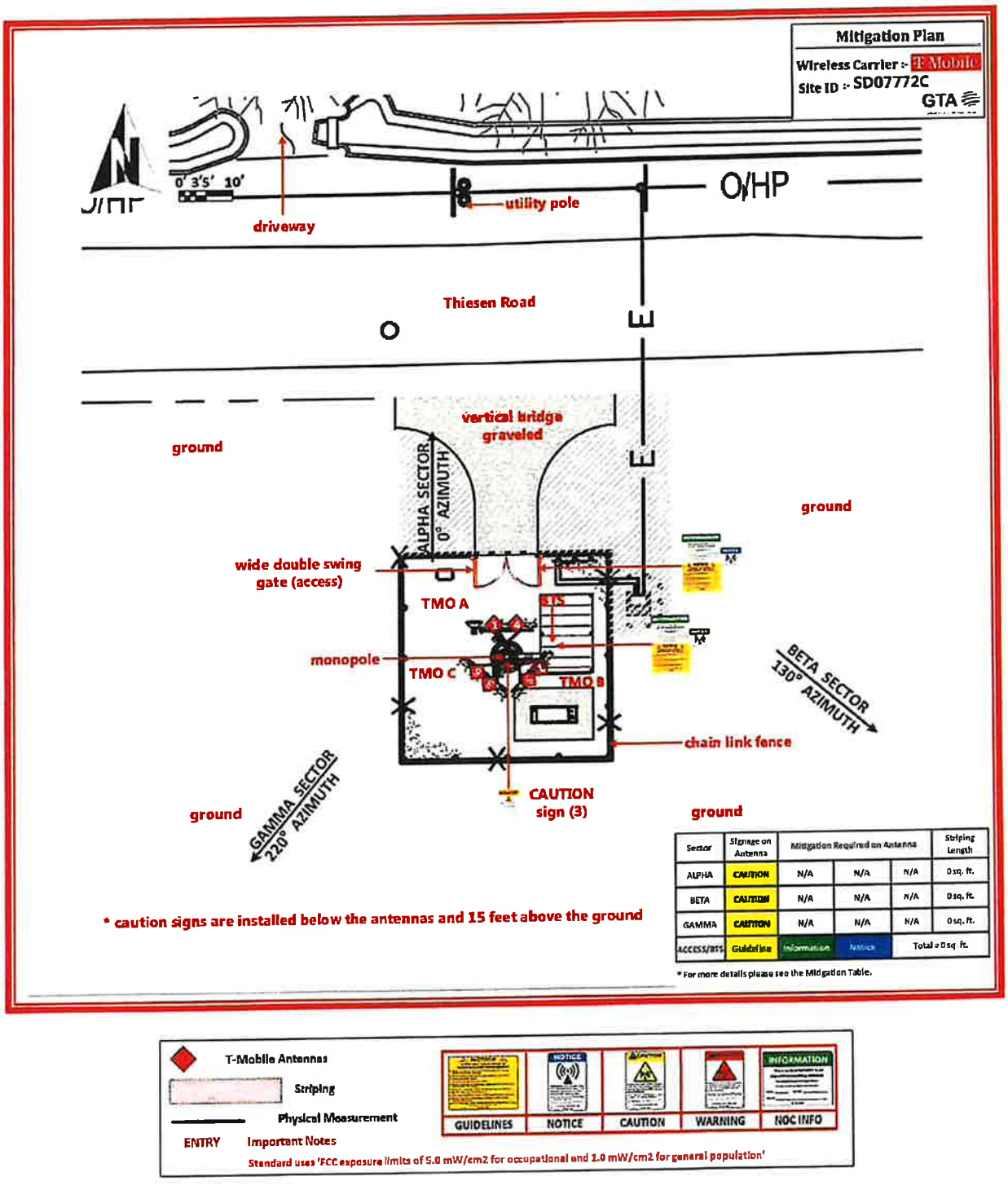
It is further recommended to distribute this report to anyone accessing the roof and ensure the confirmation that it has been read and understood.

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Site ID: SD07772C

Diagram 1: Site Scale Plan



Sector	Signage on Antenna	Mitigation Required on Antenna			Striping Length
ALPHA	CAUTION	N/A	N/A	N/A	0 sq. ft.
BETA	CAUTION	N/A	N/A	N/A	0 sq. ft.
GAMMA	CAUTION	N/A	N/A	N/A	0 sq. ft.
ACCESS/BTS	Guideline	Information	Notice		Total = 0 sq. ft.

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9.0 Summary And Conclusions

GTA has prepared this Radiofrequency Emissions Compliance Report for the proposed T-Mobile telecommunications equipment at the site located at **1734 E Underwood Rd, Holtville, CA 92250.**

GTA has conducted theoretical modeling to estimate the worst-case power density from T-Mobile antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements.

As presented in the preceding sections, based on worst-case predictive modeling, **there are no modeled exposures on any accessible ground-level walking/working surface** related to proposed equipment in the area that exceed the FCC's **general population** exposure limits at this site. Any of the modeled exposure areas exceeding the **general population** limits need to follow the mitigation/compliance plan proposed in the report to bring the T-Mobile antennas to compliance. As such, the proposed T-Mobile project complies with FCC rules and regulations. **Posting of the signages and the recommendations** presented in Section 8 **brings the site into compliance with FCC rules and regulations.**

At ground-level the anticipated maximum predictive RF-EME at T-Mobile facility will be 8.6% of FCC's general population limit. This was determined through calculations along a radial from each sector taking full power values into account as well as actual vertical plane antenna gain values per the manufacturer-supplied specifications for gain. Based on worst-case predictive modeling, there are no areas at ground level related to the proposed antennas that exceed the FCC's occupational or general population exposure limits at this site. **At ground level, the maximum power density generated by the antennas is approximately 8.6% of FCC's general population limit (1.72% of the FCC's occupational limit).**

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier that has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

Modeling indicates that there will be no accessible areas on the walking/working surfaces at the ground-level in front of the T-Mobile antennas that may exceed the FCC standards for the general population and/or occupational exposure after the implementation of mitigation measures. To reduce the risk of exposure and/or injury, GTA recommends that access to the **monopole** or areas associated with the active antenna installation or mitigation measures are restricted and secured where possible.

To alert any workers or general population potentially accessing the site, a blue Notice sign and/or yellow Caution sign, and/or orange Warning sign based on the simulated exposure limits along with a yellow Guidelines sign are recommended for installation at the access to the rooftop/structure along with the barriers/striping to exclude the RF radiations exceeding areas per the applicable limits.

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10.0 Certification

This report has been prepared under the direction of the following Registered Professional Engineer:

I **Michael A. McGuire PE**, on the date indicated near my seal below hereby certify that:

I am registered as a Professional Engineer with the License number listed below and I am thoroughly familiar with the Regulations of the Federal Communication Commission (FCC), both in general and specifically, as they apply to FCC guidelines for human exposure to Radiofrequency electromagnetic radiation and the EME predictive analysis for the site identified as **SD07772C** located at **1734 E Underwood Rd, Holtville, CA 92250**, has performed on **January 14, 2025** to determine where there might be electromagnetic energy that is more than both the Controlled Environment and Uncontrolled Environment levels; and that I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge.



sealed 20jan2025

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Attachment 17

Co-Location Letter of Intent

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Vertical Bridge Holdings, LLC
750 Park of Commerce Drive Suite 200
Boca Raton, FL 33487
561 948-6367
VerticalBridge.com

December 23, 2024

Imperial County
Planning and Land Use Division
801 Main St.
El Centro, CA 92243

Re: VB BTS III, LLC Telecommunication Tower Application (Parcel ID # 045-600-017)
Site Name and Number: Holtville / US-CA-5363

To Whom it May Concern:

By this letter of intent, VB BTS III, LLC, as the proposed owner of the tower, commits to allowing the shared use of the tower for co-location of other antennae, where structurally, technically, physically, economically, and contractually feasible, with the cost of modifying the tower, if required, to be borne by the co-locating company.

We appreciate your time and attention to this matter.

Sincerely,

VB BTS III, LLC.

By: _____
Name: Randy Wilson
Title: Vice President Development
Date: 1/6/25

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Vertical Bridge Holdings, LLC
750 Park of Commerce Drive Suite 200
Boca Raton, FL 33487
561-948-6367
VerticalBridge.com

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 6th day of January, 2025, by means of ☐ physical presence or ☐ online notarization by VB BTS II, LLC, a Delaware limited liability company.

Joanne M Bruning
Signature of Notary Public

Joanne M Bruning
Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known ✓ OR Produced Identification _____

JEANNE M. BRUNING
MY COMMISSION # HH 489847
EXPIRES: April 20, 2028

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Attachment 18

FAA TOWAIR Report

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Federal Aviation Administration

Notice Criteria Tool

Notice Criteria Tool - Desk Reference Guide V_2018 2 0

The requirements for filing with the Federal Aviation Administration for proposed structures vary based on a number of factors: height, proximity to an airport, location, and frequencies emitted from the structure, etc. For more details, please reference CFR Title 14 Part 77.9.

You must file with the FAA at least 45 days prior to construction if:

- your structure will exceed 200ft above ground level
- your structure will be in proximity to an airport and will exceed the slope ratio
- your structure involves construction of a traverseway (i.e. highway, railroad, waterway etc...) and once adjusted upward with the appropriate vertical distance would exceed a standard of 77.9(a) or (b)
- your structure will emit frequencies, and does not meet the conditions of the FAA Co-location Policy
- your structure will be in an instrument approach area and might exceed part 77 Subpart C
- your proposed structure will be in proximity to a navigation facility and may impact the assurance of navigation signal reception
- your structure will be on an airport or heliport
- filing has been requested by the FAA

If you require additional information regarding the filing requirements for your structure, please identify and contact the appropriate FAA representative using the Air Traffic Areas of Responsibility map for Off Airport construction, or contact the FAA Airports Region / District Office for On Airport construction.

The tool below will assist in applying Part 77 Notice Criteria.

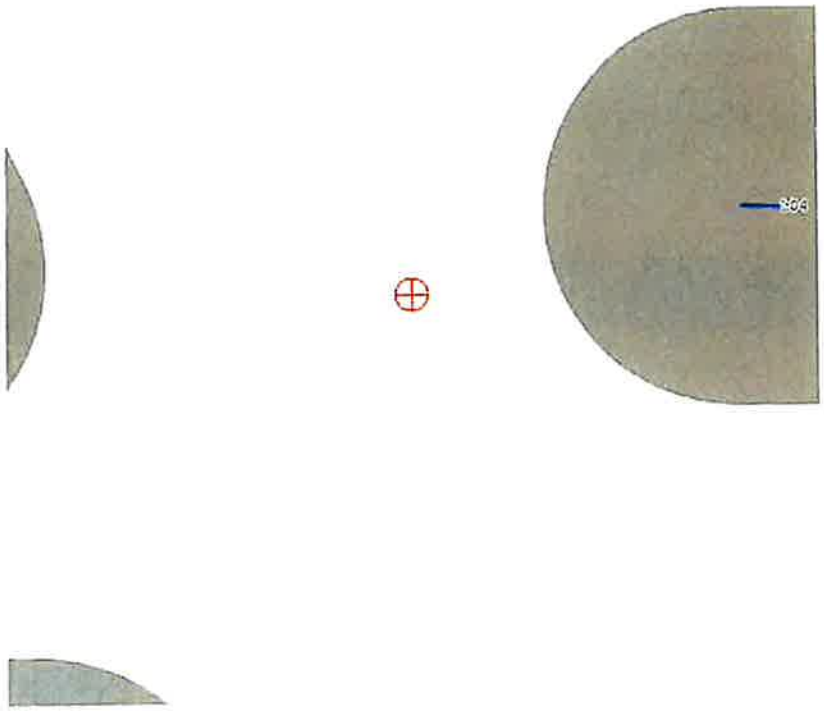
* **Structure Type:**	TOWER | Antenna Tower Please select structure type and complete location point information.
Latitude:	32 Deg 49 M 18.25 S N
Longitude:	115 Deg 23 M 10.98 S W
Horizontal Datum:	NAD83
Site Elevation (SE):	22 (nearest foot)
Structure Height :	130 (nearest foot)
Is structure on airport:	(●) No ( ) Yes

Results

You do not exceed Notice Criteria.

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Antenna Structure Registration

TOWAIR Determination Results

HELP

New Search Printable Page

*** NOTICE ***

TOWAIR's findings are not definitive or binding, and we cannot guarantee that the data in TOWAIR are fully current and accurate. In some instances, TOWAIR may yield results that differ from application of the criteria set out in 47 C.F.R. Section 17.7 and 14 C.F.R. Section 77.13. A positive finding by TOWAIR recommending notification should be given considerable weight. On the other hand, a finding by TOWAIR recommending either for or against notification is not conclusive. It is the responsibility of each ASR participant to exercise due diligence to determine if it must coordinate its structure with the FAA. TOWAIR is only one tool designed to assist ASR participants in exercising this due diligence, and further investigation may be necessary to determine if FAA coordination is appropriate.

DETERMINATION Results

Structure does not require registration. There are no airports within 8 kilometers (5 miles) of the coordinates you provided.

Your Specifications

NAD83 Coordinates	
Latitude	32-49-18.2 north
Longitude	115-23-10.9 west
Measurements (Meters)	
Overall Structure Height (AGL)	39.6
Support Structure Height (AGL)	36.6
Site Elevation (AMSL)	6.7
Structure Type	
MTOWER - Monopole	

Tower Construction Notifications
Notify Tribes and Historic Preservation Officers of your plans to build a tower.

Federal Communications Commission
45 L Street NE
Washington, DC 20554

Phone: 1-877-480-3201
TTY: 1-717-338-2824
Submit Help Request

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ATTACHMENT "J"

CONDITIONAL USE PERMIT #25-0004 APPLICATION AND SUPPORTING DOCUMENTS

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VB BTS III, LLC Tower
CA-5363

WCF Conditional Use Permit Application
WCF Variance

Supplemental and Revised Materials

APN: 045-600-017
1734 E Underwood Rd.
Holtville, CA 92250

Sept. 19, 2025

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Sept. 19, 2025

Imperial County Planning Department
801 Main St
El Centro, CA 92243

RE: Supplemental Application Materials | CUP #25-0004, IS # 25-0012, V25-0001

Luis,

On behalf of Vertical Bridge and T-Mobile, we hereby submit additional materials to supplement and strengthen the existing package that Planning has been provided with up to this point. In consideration of the ALUC and EEC Hearing feedback, we have revised and added to our existing application and greatly appreciate the consideration of our project.

Please see the list of attachments included below.

Attachment 1: Project Narrative (this document) *(Revised)*
Attachment 2: Statement of Code Compliance *(Revised)*
Attachment 8: Zoning Drawings *(Revised)*
Attachment 9: Alternative Sites Analysis *(Revised)*
Attachment 13: Photo Simulations *(Revised)*
Attachment 15: T-Mobile Coverage Objective & Engineering Justification *(Revised)*
Attachment 19: NEPA Report, dated March 14, 2025 *(New)*
Attachment 20: IVECA Public Benefit Agreement *(New)*
Attachment 21: Fall Zone Letter *(New)*

Attachment 1:
The Project Narrative has been revised to reflect the updated attachment list, to include the updated antenna count from 10 to 11, and to include the Search Ring and coverage information.

Attachment 2:
The Statement of Code Compliance has been revised per design changes and to strengthen existing responses. The revised document includes responses to the Variance findings as well.

Attachment 8:
The Zoning Drawings have been revised to update the fencing design to incorporate beige, vinyl privacy slats and to update the antenna count from 10 to 11. Notes have been added regarding the non-reflective finish of the tower and equipment. Should the County staff prefer that the tower and equipment be painted, the Applicants are willing to paint the tower and equipment in a color that County staff feels best blends the tower into the surrounding context and are open to discussion regarding alternative designs.

Attachment 9:
The Alternative Sites Analysis has been revised to include property information for the parcels where responses were not received regarding interest of leasing space for the proposed tower. The T-Mobile RF Seach Ring has also been revised on these pages to reflect updated information provided by T-Mobile's RF engineers. An exhibit has also been included within this document to show the setbacks from the nearest residences and R-1 parcel line.

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Attachment 13:
The Photo Simulations have been revised to update the location of the tower in View A to the opposite side the house, as it was incorrectly shown in the original file. View B has been updated to reflect the fencing with privacy slats, designed to blend in with the wall of the neighboring residence.

Attachment 15:
T-Mobile's RF Engineers have revised the Coverage Maps to provide a stronger justification of the tower and its location. The Coverage Objective and Engineering Justification now includes a comparison between the proposed 120' height and if the tower were to be proposed at 60' to meet the requirement of the A-1 zone. Figure C on Slide 8 of this document shows that a tower at 60' would result in a loss of coverage to 4658 Residents, or 81.4% of the coverage that will be provided by the 119' antenna tip height. The proposed tower is designed to provide reliable wireless coverage to the area northeast of Holtville and is intended to provide continuous coverage throughout the City of Holtville. It will extend the T-Mobile Coverage currently provided by the existing tower located south of Holtville and will ensure that there are no gaps in coverage.

Attachment 19:
The NEPA Report has been provided with this resubmittal. Applicants also note the comments and conditions provided by CDFW in response to the IS/ND. Applicants will comply with the conditions as stated, especially regarding the nesting bird survey and burrowing owl preconstruction surveys. No burrowing owl habitat was found present on the parcel when the NEPA Biological Study was conducted on March 14, 2025, and Applicants will ensure that the necessary mitigation measures are conducted prior to and during construction.

Attachment 20:
The agreement signed by VB BTS III, LLC (Vertical Bridge) certifies that space will be provided on the tower for the installation of the IVECA's equipment.

Attachment 21:
A Fall Zone Letter has been submitted with this package. This Letter addresses any structural concerns of the tower and certifies that if the tower were to structurally fail, it will fall within a radius of 5 feet based on design stress levels in accordance with the TIA-222-H Standard and the currently adopted IBC.

Please feel free to reach out should there be any questions, we appreciate your consideration.

Kind regards,

Samantha Herrmann

Samantha Herrmann
sherrmann@assurance-group.com / 310 488 6237

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Attachment 1

Project Narrative *(Revised)*

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PROJECT NARRATIVE
WCF REQUEST FOR CONDITIONAL USE PERMIT AND VARIANCE
HOLTVILLE, US-CA-5363

Submitted to Imperial County, California
Planning & Development Services Department
Updated: Sept. 18, 2025

Applicant:
VB BTS III, LLC
Attention: Brandon St.Michel
750 Park Commerce Drive, Suite 200
Boca Raton, FL 33487
(701) 368-9949
Brandon.StMichel@verticalbridge.com

Co-Applicant:
T-Mobile West LLC ("T-Mobile")
Attention: Keisha Robinson
1200 Concord Ave., Suite 500
Concord, CA 94520
Lakeisha.Robinson109@T-Mobile.com

Representative:
Assurance Development
1499 Huntington Dr #305
South Pasadena, CA 91030
Contact: Samantha Herrmann
(310) 488-6237
sherrmann@assurance-group.com

Property-Owner:
Jesus Diaz & Priscilla Gonzales
1734 E Underwood Rd.
Holtville, CA 92250

Project Address:
1734 E Underwood Rd, Unit 2
Holtville, CA 92250

Description & Tax Lot: Parcel No. 045-600-017

Zoning Classification: A-1, Limited Agricultural

General Plan Designation: Urban

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Assurance Development, Inc., submits this application on behalf of VB BTS III, LLC and T-Mobile West LLC ("T-Mobile"), collectively referred to as the "Applicants," and the underlying property owner.

VB BTS III, LLC is the largest private owner and operator of communications infrastructure in the United States, with more than 320,000 sites nationwide. Infrastructure providers, like VB BTS III, LLC, specialize in developing, constructing, leasing, and maintaining the physical components for wireless networks, including cellular towers. Infrastructure providers lay the physical groundwork that supports wireless communication networks. Wireless carriers, such as T-Mobile, lease space on this infrastructure to house their equipment and offer wireless services to end-users. Through strategic partnerships with wireless carriers, VB BTS III, LLC allows the opportunity for multiple carriers to collocate onto a single infrastructure and reduces the physical footprint of wireless facilities in the community.

1. PROJECT OVERVIEW

VB BTS III, LLC is proposing to build a new wireless communications facility ("WCF" or "Facility"), Holtville CA-5363, at the above noted project address for the colocation of T-Mobile's equipment. This Facility is intended to fill a significant gap in T-Mobile's 5G and 4G LTE coverage experienced by its customers in a targeted coverage area in Imperial County.

The Applicants intend for its application for the proposed WCF to include the following documents (collectively, "Applicants' Application"):

Attachment 1:	Project Narrative (this document) *(Revised)*
Attachment 2:	Statement of Code Compliance *(Revised)*
Attachment 3:	Conditional Use Permit Application Form
Attachment 4:	Indemnification Form
Attachment 5:	Variance Application Form
Attachment 6:	Authorized Agent Letter of Authorization
Attachment 7:	Owner Letter of Authorization
Attachment 8:	Zoning Drawings *(Revised)*
Attachment 9:	Alternative Sites Analysis *(Revised)*
Attachment 10:	Assessor's Parcel Map
Attachment 11:	Grant Deed
Attachment 12:	Title Report
Attachment 13:	Photo Simulations *(Revised)*
Attachment 14:	Equipment Specifications
Attachment 15:	T-Mobile Coverage Objective & Engineering Justification *(Revised)*
Attachment 16:	EME Report
Attachment 17:	Co-Location Letter of Intent
Attachment 18:	FAA TOWAIR Report
Attachment 19:	NEPA Report, dated March 14, 2025 *(New)*
Attachment 20:	IVECA Public Benefit Agreement *(New)*
Attachment 21:	Fall Zone Letter *(New)*

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As shown in Applicants' Application, this proposed project meets all applicable Imperial County Municipal Code ("ICMC") criteria for siting new wireless telecommunications facilities and complies with all other applicable state and federal laws and regulations. The proposal is also the least intrusive means of meeting T-Mobile's coverage objectives for this site. Accordingly, the Applicants respectfully request Imperial County to review this Application as proposed, subject only to the County's standard conditions of approval.

2. PROPOSED PROJECT DETAILS

2.1. Location

Detailed information regarding the subject property and proposed lease area is included in **Attachment 8, Zoning Drawings**, to the Applicants' application.

2.1.1. Subject property. The subject property of this proposal is located at 1734 E Underwood Rd, Holtville, CA 92250 (Parcel No. 045-600-017) in Imperial County (the "Property"). The Property is owned by Jesus Diaz Gonzales. The Property is zoned as A-1-U and is currently used for residential and agricultural industry purposes.

2.1.2. Lease area.

- The proposed 1600 sq. ft. lease area for the WCF is in the northern portion of the parcel, setback approximately 60 ft. from the north, 315 ft. from the east, 530 ft. from the south, and 5 ft. from the west. (the "Lease Area").

- The lease area will be surrounded by a 6 ft. high chain link fence screened with beige, vinyl privacy slats.

2.1.3. Access and parking. The proposed graveled access road will be 30 ft long and 12 ft. wide. It stems from Thiesen Rd. and stops at the proposed lease area.

2.2. Wireless Facilities and Equipment

Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 8, Zoning Drawings**, to Applicants' Application.

2.2.1. Support structure design. Applicants are proposing to build a new 120 ft tall monopole (the "Tower") on the Property. This will be an unmanned wireless communications facility.

2.2.2. Antennas and accessory equipment.

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- The Tower will contain T-Mobile equipment consisting of a 120' Monopole With (11) 8' Antennas, (12) RRU's, (1) 3' Microwave, (1) GPS Antenna, Required Antenna Cabling, and HCS Jumpers.
- The antennas, RRUs, and accessory equipment on the Tower will be non-reflective.
- The tower is to be made of non-reflective galvanized steel that will dull over time.
- Space for two additional future collocators has been made available on the Tower as encouraged under the Code, as shown on Sheet A4 of **Attachment 8, Zoning Drawings.**
- The proposed T-Mobile antenna centerline is 115 ft. See elevations on Sheet A4 of **Attachment 8, Zoning Drawings.**

2.2.3. Ground equipment.

- The ground equipment will consist of (2) Ground Mounted Radio Cabinets, (1) Back-Up Diesel Generator, (1) 10'x15' Ice Canopy, (2) Raised Concrete Pads, Utility Backboard and Multi-Meter Utility Service Mounted On H-Frame.
- An ice bridge is proposed from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas.
- The Tower and all ground equipment will be constructed within the 40' x 40' fenced Lease Area, not including the proposed Imperial Irrigation District transformer.

2.3. Additional Details

2.3.1. Lighting. The Tower will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. There will be two service lights on site that will only be utilized during site maintenance visits or in case of an emergency. See **Attachment 8, Zoning Drawings**, sheet A3 for further service lighting details.

2.3.2. Utilities. No water or sewer service is required. A proposed Imperial Irrigation District transformer will be added adjacent to the lease area. Proposed utility route is shown on **Attachment 8,** sheets A1 and A2.

3. T-MOBILE NETWORK COVERAGE AND SERVICES

3.1. Overview—T-Mobile 4G & 5G Coverage

T-Mobile is upgrading and expanding its wireless communications network to support the latest 4G LTE and 5G technology. 4G and 5G stand for "4th Generation" and "5th Generation" and LTE stands for "Long Term Evolution." These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality – 4G LTE offers speed up to ten times faster than 3G,

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and 5G can deliver speeds up to 20 Gbps in ideal conditions. That's nearly 200 times faster than the 4G network.

Most American consumers currently experience wireless connectivity on 4G networks – and are aware of the profound impact on daily life that has occurred from this connectivity. The emerging standard in voice and data telecommunications – 5G – is poised to transform America's reliance on densely populated wireless infrastructure.

5G is the latest iteration of cellular technology. While 5G technology operates on the same radio signals as current 4G/4G LTE networks, it is engineered to transmit data more efficiently. That means superior speeds and support for more connected devices than ever before. The ultra-low latency of 5G means quick response times during data-demanding activities.

There are several components of 5G wireless technology and separate bands of wavelength spectrum used to build a 5G network – low-band (<1GHz), mid-band (1-6GHz), and high-band millimeter wave ("mmWave") (24 GHz and higher):

- **Low-Band Extended Range 5G.** Low-band 5G frequencies are also known as the "coverage layer." Low-band 5G refers to frequencies below 1 GHz used to roll out substantial 5G coverage as quickly as possible. One example is the 600 MHz spectrum deployed by T-Mobile nationwide. A low-band cell site can cover hundreds of square miles and deliver a downlink data rate from 30-75 Mbps download—ideal for uses like streaming HD video. Because low-band signals easily pass through buildings, they offer solid coverage indoors and outdoors and are an effective way to connect parts of rural America where even fixed broadband speeds don't always meet national benchmarks.
- **Mid-Band 5G.** Mid-range frequencies (spanning 1 GHz and 6 GHz) strike a balance between coverage and capacity. Mid-band 5G base stations can transmit and receive high-capacity signals over fairly large areas, and they can represent an ideal mix of performance for the bulk of 5G traffic in metropolitan areas.
- **High-Band mmWave 5G.** High-band 5G uses millimeter-wave (mmWave) frequency bands. High-band is a very specialized part of the 5G offering. Functioning over a shorter radius, it's particularly useful in urban areas and busy venues like stadiums and shopping malls. High-band can simultaneously provide many high-speed connections focused on an area of just a block or two, from a small cell site mounted close to street level.

Using these frequencies together can help T-Mobile's 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the proposed Facility will become part of T-Mobile's statewide and nationwide communications network. Personal Communication (PCS) facilities used by T-Mobile in this area operate within a frequency range of 600-2500 MHz. Upon completion, the Facility will become part of T-Mobile's statewide and nationwide communications network. See **Attachment 15, T-Mobile Coverage Objective & Engineering Justification.**

3.2 Coverage Objectives for Proposed Facility

This proposed facility meets T-Mobile's coverage and capacity objectives by providing reliable 5G and 4G wireless coverage within an area northeast of Holtville and the surrounding area, not

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adequately served by T-Mobile's network. Specifically, this proposed new wireless facility is intended to improve both voice & data services to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks.

T-Mobile has established a need for service in this geographic area, as determined by market demand, coverage requirements for a specific geographic area, and the need to provide continuous coverage from one site to another in a particular geographic region. The specific coverage objective was determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area. See **Attachment 15, T-Mobile Coverage Objective & Engineering Justification**.

4. SEARCH RING

T-Mobile's RF engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, T-Mobile RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.

The search ring established for this proposal, and a description of the methodology used to identify the search ring, is provided in **Attachment 15, T-Mobile Coverage Objective & Engineering Justification**.

5. SITING ANALYSIS

Pursuant to the Imperial County Code § 92401.06, Applicants evaluated alternative site locations, including collocation opportunities, within the targeted search ring possible locations for the proposed Facility. See **Attachment 9, Alternative Sites Analysis** for a summary of the alternative site locations analyzed.

6. APPLICABLE LAW

6.1. Local Codes

Pursuant to ICMC § 92401.05.A, new co-located WCF in the Limited Agricultural District are subject to issuance of a Conditional Use Permit subject to approval by the planning director and must comply with the criteria in 92401.04. **See Attachment 2 — Statement of Code Compliance** for Applicants' demonstration of compliance with the applicable code.

6.2. State Law

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Wireless telecommunication facilities that require discretionary review also require environmental review under the California Environmental Quality Act (CEQA). A discretionary project is one that requires the exercise of judgement or deliberation by a public agency in determining whether the project will be approved, or if a permit will be issued.

6.3. Federal Law

Federal law, primarily found in the Telecommunications Act of 1996 ("Telecom Act"), acknowledges a local jurisdiction's zoning authority over proposed wireless facilities but limits the exercise of that authority in several important ways.

6.3.1. Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that "prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission ("FCC") Order adopted in September 2018,[1] a local jurisdiction's action has the effect of prohibiting the provision of wireless services when it "materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment."[2] Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.[3]

While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap**. Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City,* 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007*), affirmed in part,* 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco,* 2006 WL 1699580, *10-11 (N.D. Cal. 2006).

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[1] *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part*, *City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").

[2] Id. at ¶ 35.

[3] Id. at ¶¶ 34-42.

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- **Least Intrusive Means.** The least intrusive means standard "requires that the provider show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

6.3.2. Environmental and health effects prohibited from consideration. Also under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed facility should be disregarded in this proceeding.

6.3.3. No discrimination amongst providers. Local jurisdiction also may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers' applications for similarly situated facilities.

6.3.4. Shot Clock. Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a "reasonable" period of time. 47 U.S.C. § 332(c)(7)(B)(ii). The FCC has issued a "Shot Clock" rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq*. According to the Shot Clock rule for "macro" wireless facilities, a reasonable period of time for local government to act on all relevant applications is 90 days for a collocation, with "collocation"[4] defined to include an attachment to any existing structure regardless of whether it already supports wireless, and 150 days for a new structure.

The Shot Clock applies to all authorizations required for siting a wireless facility, including the building permit, and all application notice and administrative appeal periods.

Pursuant to federal law, the reasonable time period for review of this application is 150 days.

[4] 47 C.F.R. § 1.6002(g).

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Attachment 2

Statement of Code Compliance*(Revised)*

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STATEMENT OF CODE COMPLIANCE
WCF CONDITIONAL USE AND VARIANCE APPLICATION
HOLTVILLE, CA-5363

Updated: Sept. 18, 2025

Submitted to Imperial County
Planning & Development Services Department

The Applicants' proposal complies with all requirements of the Imperial County Municipal Code ("ICMC"), which are addressed in this Statement of Code Compliance in the following order:

Title 9 – Land Use code

I. **Wireless Facilities Requirements**

- Division 24 Communication Facilities – Chapter 1 Communication Facilities

II. **General Requirements**

- **Division 2 General Provisions – Chapter 3 Land Use Permits (Conditional Use Permit)**
- **Division 2 – General Provisions, Chapter 2 Land Use Permits (Variance)**

PLEASE NOTE: Applicants' responses to the above referenced criteria are indicated below each applicable provision in ***bold italicized blue text.***

Division 24 COMMUNICATION FACILITIES

Chapter 1 COMMUNICATION FACILITIES

92401.00 Purpose.

This division is enacted to establish a consistent set of standards regulating the placement and design of all types of communication facilities in unincorporated areas of Imperial County. These standards are intended to protect and promote public health, safety, community welfare and the unique visual character of Imperial County by encouraging the orderly development of communication infrastructure. It is the intent of the board that these regulations serve to:

A. Protect residential areas and other land uses from potential adverse impacts of towers and antennas;

B. Encourage the location of towers and regeneration facilities in nonresidential areas;

C. Minimize the number of towers throughout the community;

D. Strongly encourage the joint use of new and existing tower sites as a primary option rather than construction of additional single-use towers;

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E. Encourage users of towers and antennas to locate them, to the extent possible, in areas where the adverse impact on the community is minimal;

F. Encourage users of towers and antennas to configure them in a way that minimizes the adverse visual impact of the towers and antennas through careful design, siting, landscape screening, and innovative camouflaging techniques;

G. Enhance the ability of the providers of telecommunications services to provide such services to the community quickly, effectively, and efficiently;

H. Consider the public health and safety of communication towers;

I. Avoid potential damage to adjacent properties from tower failure through engineering and careful siting of tower structures. All towers are to be engineered for the environment in which they are to be located and for the expected loading;

J. Encourage the due consideration of the Imperial County's general plan, zoning map, existing land uses, and environmentally sensitive areas in approving sites for the location of towers and antennas;

K. Minimize the amount of private infrastructure systems in public rights-of-way.

Applicants' Response: The project will comply with the service requirements, placement, design, and other provisions of this Division as demonstrated herein, and will comply with all applicable requirements of State and Federal law.

92401.01 Definitions.

Applicants' Response: This Section has been omitted for brevity; however, Applicants acknowledge and understand the definitions of the terms used in this Division.

92401.02 Applicability.

This division shall apply to all types of communication facilities including but not limited to towers, regeneration facilities, amplification facilities, and repeater facilities, whether sited on the ground, or elevated on towers or structures.

A. New Towers and Antennas. All new replacement, or re-permitted towers, antennas or facilities in the unincorporated areas of Imperial County shall be subject to these regulations, except as provided under Section 92401.03. "Re-permitted" means renewal of a permit at any one of the cycles originally approved in the CUP, and also means a facility for which a CUP has expired but is being permitted again by either the same or another owner operator, which may be done by the planning director or the planning commission.

Applicants' Response: Applicants are proposed a new 120' monopole tower, commonly referred to as a wireless communications facility ("WCF") at 1734 E Underwood Rd, Holtville, CA 92250. The facility will include a 10-foot lightning rod at the top of the tower, resulting in an overall structure height of 130 feet. Applicants are requesting the review of Application materials and will comply with the regulations set forth in this division as set forth herein.

The remainder of Section 92401.02 has been omitted, as the remainder of the facility types listed in this section are not applicable to the proposed project.

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92401.03 Exemptions.

Section 92401.03 has been omitted as it is not applicable, as the proposed tower is not exempt from the requirements of this chapter.

92401.04 General requirements.

All new, altered and re-permitted communication facilities in unincorporated areas of Imperial County, with the exception of those exempted under Section 92401.03, shall meet the following general requirements, regardless of the zone in which they are located:

1. Zones. Wireless communication facilities may be located in all base zones which allow such facilities, upon approval of a conditional use permit as described below.

Applicants' Response: The proposed tower is located within the A-1 zone, in which utility and communication facilities are allowed upon approval of a conditional use permit. (Section 90507.02.jj)

2. Use Permit Required. All wireless communication facilities and all wired or fiber regeneration facilities other than those designated as exempt under Section 92401.03 require a conditional use permit (CUP). To obtain a conditional use permit, a hearing is required before either the planning director or the planning commission, as provided for in this title.

Applicants' Response: Applicants have applied for a Conditional Use Permit and Variance and will comply with further instructions regarding hearings.

3. Building Permit Required. All communication facilities shall require a building permit issued by the county of Imperial.

Applicants' Response: Upon approval of the CUP, Applicants will apply for a building permit from the county.

4. Design Consistency with the Surrounding Environment. To the maximum extent feasible, all wireless communication facilities and all regeneration facilities shall blend in with the predominant features of the existing natural and/or built environments in which they are located. To this end, co-location, stealth mounts, structure mounts and ground mounts are particularly encouraged.

Applicants' Response: The standard finish for wireless communication towers is galvanized, non-reflective sky-blue steel. Many jurisdictions prefer that towers remain unpainted if they are made of dull, non-reflective materials such as galvanized steel. All tower-mounted antennas and equipment will be treated to reduce or eliminate reflective glare.

The proposed tower is to be constructed of galvanized steel. This steel is designed to blend with the surrounding sky. Should the County staff prefer that the tower and equipment be painted, the Applicants are willing to paint the tower and equipment in a color that County staff feels best blends the tower into the surrounding context.

The tower will provide for space for the future co-location of two additional carriers. Vertical Bridge will also provide tower space at the maximum height of 65' for the Imperial Valley Emergency Communications Authority, as determined by a Public Benefit agreement, please see Attachment 20. Please see Sheet A4 of Attachment 8, Zoning Drawings for the tower elevations and carrier locations.

5. Height. All communication facilities shall conform to the following height requirements:

   a. All communication facilities shall be of the minimum functional height, with additional provisions for co-location, as allowed in the respective base zone unless a variance is approved concurrent with a CUP. (For example, if the number of co-locators that a particular facility is designed for is four and the required height is eighty (80) feet, then the allowed height of the facility would be

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one hundred ten (110) feet and if it is five co-locators, then it would be one hundred twenty (120) feet).

Applicants' Response: The proposed tower will be one hundred twenty (120) feet in height, with a ten (10) foot lightning rod mounted at the top, for a total structure height of one hundred thirty (130) feet. The WCF has been designed to accommodate three co-located wireless providers. The Tower has been proposed to be the lowest possible height to meet T-Mobile's technical service objectives. During the CUP Application Process, applicants will be requesting review and approval of a variance for the additional height requested from the base zone height of 60'. A facility limited to the base zone height of 60 ft. would result in a 44.7% reduction in square miles receiving reliable coverage (4.7 miles at 119 ft vs 2.6 miles at 60 ft), and 81.4% reduction in the new population receiving reliable coverage (5,720 residents at 119 ft vs. 1,062 residents at 60 ft.) T-Mobile's RF engineers have determined that the 119' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives.

b. All communication facilities constructed within three-quarters of a mile of a designated scenic corridor (as designated by the Imperial County general plan) shall conform with the height limit in the zone in which they are located. New facilities that are co-located with an existing facility may exceed their zone's height limit, provided that the installation of the new facility does not require a height increase of the existing facility.

Applicants' Response: The tower is not located within three-quarters of a mile of a designated scenic corridor.

c. Outside of the three-quarter-mile range of a designated scenic corridor, communication facility, except an exempt facility, may exceed one hundred twenty (120) feet. A bonus of twenty (20) additional feet per facility, up to a maximum height of three hundred (300) feet, is permissible for operators co-locating on a single facility.

Applicants' Response: The tower is proposed to be one hundred twenty (120) feet with three co-located carriers.

d. No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted, unless facility is fully screened and height does not exceed height permitted by applicable zoning code.

Applicants' Response: The proposed tower is freestanding and therefore this is not applicable.

e. If an operator wishes to apply for an exception to these height limitations, then the facility shall be subject to the provisions at this title relating to conditional use permits and variances hearing processes.

Applicants' Response: Applicants will be be requesting review and approval of a variance concurrently with the CUP and will comply with any hearing processes.

6. Screening. All communication facilities shall be screened to the maximum extent possible, pursuant to the following requirements.

a. Ground- and tower-mounted antennas and all sound structures shall be located within areas where substantial screening by vegetation, landform and/or buildings can be achieved. Additional vegetation and/or other screening may be required as a condition of approval. Each structural screening shall be based on a recommendation from the planning department having addressed the visual impacts, which in some instance may, in fact, warrant no screening.

Applicants' Response: The ground equipment will be secured and screened by the six (6) foot tall chain-link fence, with beige, vinyl privacy slats. Please see Attachment 8, Zoning Drawings, and Attachment 13, Photo Simulations.

a. The projection of structure-mounted antennas from the face of the structure to which they are attached shall be minimized.

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Applicants' Response: The remainder of Section 92401.04 has been omitted, as the facilities are not applicable to this project.

7. Radio-Frequency Exposure. No communication facility shall be sited or operated in such a manner that it poses, either by itself or in combination with other such facilities, a potential threat to public health. To that end, no communication facility or combination of facilities shall produce at any time power densities that exceed the current FCC adopted standards for human exposure to RF fields. Certification that a facility meets this standard is required. A copy of the certification from the FCC shall be submitted to the county.

Applicants' Response: The proposed WCF will comply with all standards and regulations set forth by the FCC. Please see Attachment 16, EME Report.

8. Cabling. For structure-mounted antennas, all visible cabling between equipment and antennas shall be routed within the building wherever feasible, or on the roof below the parapet wall. Cabling on the exterior of a building or monopole shall be located within cable trays painted to match. All cabling shall be performed in accordance with the NEC (National Electrical Code).

Applicants' Response: Applicants will comply with the cabling regulations as described.

9. Painting and Lighting. All facilities shall be painted or constructed of materials to minimize visual impact. All towers shall be painted in a non-reflective and preferably earth tone colors. All towers shall be lit with approved lighting as required by the FAA and the Airport Land Use Commissions standards.

Applicants' Response: The standard finish for wireless communication towers is galvanized, non-reflective sky-blue steel. Many jurisdictions prefer that towers remain unpainted if they are made of dull, non-reflective materials such as galvanized steel. All tower-mounted antennas and equipment will be treated to reduce or eliminate reflective glare. Should the County staff prefer that the tower and equipment be painted, the Applicants are willing to paint the tower and equipment in a color that County staff feels best blends the tower into the surrounding context.

10. Noise. All communication facilities shall be designed to minimize noise. If a facility is located in or within one hundred (100) feet of a residential zone, noise attenuation measures shall be included to reduce noise levels to a maximum exterior noise level of fifty (50) Ldn at the facility site's property lines.

Applicants' Response: The proposed WCF is not to be located within one hundred (100) feet of a residential zone or residence. Please see Figure F within Attachment 9, Alternative Sites Analysis for demonstration of setbacks.

11. Accessory Structures. Enclosures and cabinets housing equipment related to a wireless communication facility shall meet setback and height restrictions for such structures in their zones. Such structures shall appear architecturally compatible (as determined by the planning director evaluating the facility on the basis of color and materials) with their surroundings and be designed to minimize their visual impact. To meet this requirement, underground vaults may be required.

Applicants' Response: Equipment cabinets will be aboveground and screened by the six (6) foot tall chain link fence. The equipment will not exceed 8', as shown on Sheet A4 of Attachment 8, Zoning Drawings. All equipment will be screened from public view by the 6' tall chain link fence with beige privacy slats. All structures meet the setback and height restrictions of the A-1 Zone.

12. Roads and Parking. Communication facilities shall be served by the minimum roads and parking areas necessary and shall use existing roads and parking areas whenever possible.

Applicants' Response: Access will be provided by a graveled access road from Thiesen Rd, and parking will be available within the access easement for the WCF.

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13. Provisions for Future Co-location. All commercial communication facilities shall be encouraged to promote future facility and site sharing. Technical evidence will be provided as to the infeasibility either technical and/or economic, of co-location or grouping prior to the issuance of a new use permit for a facility that would not be considered to be co-located or grouped under this division.

Applicants' Response: The proposed WCF allows for the co-location of two additional carriers. Vertical Bridge will provide space at a maximum height of 65' for the installation of the Imperial Valley Emergency Communications Authority Equipment, please see Attachment 20, IVECA Public Benefit Agreement. Vertical Bridge has also committed to the shared use of the tower for co-location purposes, as provided in Attachment 17, Co-Location Letter of Intent. Please see Sheet A4 of Attachment 8, Zoning Drawings for elevations and further locational details.

14. Removal Upon Discontinuation of Use. All equipment associated with a communication facility shall be removed within one hundred eighty (180) days of the discontinuation of the use and the site shall be restored to its original pre-construction condition. The operator's agreeing to such removal and allowing the county access across private property to effect such removal shall be a condition of approval of each permit issued. At its discretion, the county may require a financial guarantee acceptable to the county to ensure removal.

Applicants' Response: Applicants will comply with this provision, if ever applicable.

15. Principal or Accessory Use. Antennas and towers may be considered either principal or accessory uses. A different existing use of an existing structure on the same lot shall not preclude the installation of an antenna or tower on such lot.

Applicants' Response: Acknowledged. The proposed WCF will constitute a principal use of the lease area, while remaining subordinate to and compatible with the existing primary use of the overall parcel, used as a residence and light agricultural land. "Utility and communication facilities" are permitted in the A-1 Zoning District subject to approval of a Conditional Use Permit (see §90507.02jj).

16. Lot Size. For purposes of determining whether the installation of a facility complies with county development regulations, including but not limited to setback requirements, lot-coverage requirements, and other such requirements, the dimensions of the entire lot shall control, even though the antennas or towers may be located on lease parcels within such lot. This shall also take into consideration the height of the tower in the event of a failure whereby it could fall thereby crossing property lines.

Applicants' Response: The proposed WCF complies with the setback requirements of the underlying A-1 District as demonstrated below. Please also see Attachment 8 – Zoning Drawings, Sheet A1 – Site Plan.

§90507.05 Yards and setbacks

Setback Type	Code Requirement	Proposed WCF Setback
Front yard (Thiesen Rd)	≥ 25 ft from edge of ROW **or** ≥ 60 ft from road centerline (whichever applies)	60 ft. from road centerline; ≥ 25 ft from edge of ROW
Side yard (west property line)	≥ 5 ft (≥ 15 ft if street side of corner lot)	5 ft.
Side yard (east property line)		350 ft.
Rear Yard (Underwood Rd.)	≥ 5 ft (or equal to front yard if through lot)	Through lot – setback 530 ft from Underwood Rd. (exceeds 60 ft/25 ft requirement)

The proposed WCF meets the minimum side yard setback requirement of the A-1 zone, with a fence setback of approximately five (5) feet from the western property line. County Code further requires consideration of tower

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height in the event the highly unlikely event of a structural failure. Standard engineering of wireless communication facilities incorporates a break point design to ensure that, in the extremely unlikely event of a structural failure, the tower would collapse within the leased compound and not extend beyond the property boundary.

§90507.04 Minimum lot size.

The subject parcel (APN 045-600-017) is approximately 216,000 square feet (4.96 acres), which substantially exceeds the minimum one-half acre lot size required in the A-1 zone under County Code §90507.04. No subdivision of land is proposed.

§90507.06 Height limit.

§90507.06(3) limits provided that radio and television antennae, chimneys and other similar structures shall not exceed sixty (60) feet. The proposed WCF is 120 ft. tall with a 10 ft lightning rod, resulting in an overall height of 130 ft. Accordingly, Applicants are requesting a Variance to deviate from the base zone height limit. The justification for this request is provided in the Variance criteria discussion set forth in the Statement of Code Compliance below.

§90507.07 Minimum distance between structures.

§90507.07(a) requires there shall be a minimum of ten feet between residential buildings/structures. The nearest residential structure is located approximately 240 ft from the proposed WCF at 1736 E Thiesen Rd. Please refer to Figure F in Attachment 9, Alternative Sites Analysis.

17. Inventory of Existing Sites. Each applicant for a facility shall provide to the planning director an inventory of its existing towers, antennas, or sites approved for facilities, that are either within the jurisdiction of Imperial County or within one mile of the border thereof, including specific information about the location, height and design of each facility. The planning director may share such information with other applicants applying for administrative approvals or special use permits under this division or other organizations seeking to locate facilities within the jurisdiction of Imperial County, provided, however that the planning director is not, by sharing such information, in any way representing or warranting that such sites are available or suitable.

Applicants' Response: On January 9, 2025, Planner Derek Newland provided feedback via email that T-Mobile and the Applicant would need not provide an inventory of its existing towers within the county as a whole. Applicants have provided an inventory of existing T-Mobile towers within three (3) miles of the proposed site, as these are the most relevant and applicable to the coverage objectives of the proposed site.

18. Aesthetics. Towers and antennas shall meet the following requirements:

    a. Towers shall either maintain a galvanized steel finish, or, subject to any applicable standards of the FAA, be painted a neutral color so as to reduce visual obstructiveness.

Applicants' Response: The WCF is proposed to be of a galvanized steel finish.

    b. At a tower site, the design of the buildings and related structures shall, to the extent possible, use materials, colors, textures, screening, and landscaping that will blend them into the natural setting and surrounding buildings.

Applicants' Response: Associated equipment will be screened within the lease area by the 6' tall chain-link fence with beige privacy slats, and no other buildings or structures are proposed.

    c. If an antenna is installed on a structure other than a tower, the antenna and supporting electrical and mechanical equipment must be of a neutral color that is identical to, or closely compatible with, the color of the supporting structure so as to make the antenna and related equipment as visually unobstructive as possible.

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Applicants' Response: The proposed antennas are to be installed on the tower and are made of a non-reflective plastic.

19. Lighting. Towers shall not be artificially lighted, unless required by the FAA or other applicable authority. If lighting is required, the lighting alternatives and design chosen must cause the least disturbance to the surrounding views and community.

Applicants' Response: The Tower will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. Please refer to Attachment 18 – FAA TOWAIR Determination. The TOWAIR determination confirms that the proposed 39.6-meter (130-foot overall height with lighting rod) monopole structure does not require registration with the FAA and that no airports are located within 8 kilometers (5 miles) of the site coordinates. Accordingly, under applicable FAA regulations, the structure is not subject to FAA lighting or marking requirements.

There will be two service lights on site that will only be utilized only during site maintenance visits or in case of an emergency. Please see Attachment 8, Sheet A3 for further locational detail.

20. State or Federal Requirements. All towers must meet or exceed current standards and regulations of the FAA, the FCC and any other agency of the state or federal government with the authority to regulate towers and antennas. If such standards and regulations are changed, then the owners of the towers and antennas governed by this division shall bring such towers and antennas into compliance with such revised standards and regulations as mandated by the controlling state or federal agency. Failure to bring towers and antennas into compliance with such revised standards and regulations shall constitute grounds for the removal of the tower or antenna at the owner's expense.

Applicants' Response: Acknowledged. Acknowledged. Applicants will ensure that the proposed facility is constructed and operated in full compliance with all applicable federal and state requirements, including current and future standards established by the FAA, FCC, and any other governing agency with jurisdiction over towers and antennas. If such standards are revised, Applicants will bring the facility into compliance with the revised requirements within the timeframe mandated by the applicable agency.

21. Building Codes—Safety Standards. To ensure the structural integrity of towers, the owner of a tower shall ensure that it is maintained in compliance with standards contained in applicable state or local building codes and the applicable standards for towers that are published by the Electronic Industries Association, as amended from time to time. If, upon inspection, the county concludes that a tower fails to comply with such codes and standards and constitutes a danger to persons or property, then upon notice being provided to the owner of the tower, the owner shall have thirty (30) days to bring such tower into compliance with such standards. Failure to bring such tower into compliance within thirty (30) days shall constitute grounds for the removal of the tower or antenna at the owner's expense.

Applicants' Response: Acknowledged. Applicants will apply for a Building Permit in compliance with current Building Codes upon approval of the CUP.

22. Measurement. For purposes of measurement, tower setbacks and separation distances shall be calculated and applied to facilities located in the unincorporated areas of the county of Imperial according to the provisions of this title for the respective base zone.

Applicants' Response: Acknowledged. Tower setbacks and separation distances for the proposed WCF have been calculated and designed to comply with the A-1 base zone regulations contained in Title 9 – Division 4 – Chapter 7: A-1 Limited Agriculture, as demonstrated as part of this Statement of Code Compliance.

23. Not Essential Services. Towers and antennas shall be regulated and permitted pursuant to this division and shall not be regulated or permitted as essential services, public utilities or private utilities.

Applicants' Response: Acknowledged.

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24. Franchises. Owners and/or operators of towers or antennas shall certify that all franchises required by law for the construction and/or operation of a communication system in Imperial County have been obtained and shall file a copy of all required franchises with the planning director.

Applicants' Response: Under California Public Utilities Code, a franchise is only required for installation or operation of facilities within the public right-of-way. The proposed WCF will be located entirely on private property and therefore does not require a franchise

25. Public Notice. For purposes of this division, any conditional use permit request, variance request, or appeal of an administratively approved CUP or special use permit shall require public notice to all abutting property owners and all property owners of properties that are located within the corresponding separation distance listed for a CUP or variance in the respective base zone, under this title, in addition to any notice otherwise required by the planning director.

Applicants' Response: Acknowledged.

26. Signs. No signs shall be allowed on an antenna or tower except as may be required by law or another permitting or licensing agency.

Applicants' Response: No signage is proposed on the WCF other than identification signage and safety signage as required by applicable federal law.

27. Buildings and Support Equipment. Buildings and support equipment associated with antennas or towers shall comply with requirements of this title.

Applicants' Response: All buildings, ground equipment, and support equipment associated with the proposed WCF will comply with the requirements of the County Code, including applicable development standards of the A-1 zone as demonstrated herein.

28. Multiple Antenna/Tower Plan. Imperial County encourages the users of towers and antennas to submit a single application for approval of multiple towers and/or antenna sites. Applications for approval of multiple sites shall be given priority in the review process.

Applicants' Response: The proposed project consists of a single monopole and associated ground equipment within one lease area. No additional towers or antenna sites are proposed under this application.

92401.05 Permitting and application requirements.

All communication facilities not specifically exempted from these regulations are subject to one of the two permit processes described below. Both processes include a conditional use permit and may have a concurrent variance. Applications for all permits required pursuant to this division shall be made in writing on a form prescribed by the planning director, and shall be accompanied by plans and data to assure the fullest practical presentation of facts for the permanent record. Such application shall be accompanied by a fee or fees as may be set by the board of supervisors. No part of such fee shall be refundable.

A. Conditional Use Permit Before the planning director. Certain communication facilities may be conditionally approved by the planning director, as described in this subsection.

1. Qualifying Facilities. The following types of communication facilities qualify for a use permit before the planning director:

a. Receive-only radio and television antennas and satellite dishes or antennas that do not qualify for exemption under Section 92401.03, including multiple antennas or dishes on a single parcel;

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b. Amateur radio facilities that do not qualify for exemption under Section 92401.03. When required, a conditional use permit before the planning director shall be granted to amateur radio operators with no fee;

c. Communication facilities installed on publicly owned property, regardless of zone, provided they comply with the general requirements in Section 92401.04 and hold an executed license or lease agreement;

d. Co-located communication facilities, regardless of zone, provided they comply with the general requirements in Section 92401.04.

2. Required Findings. In order for the planning director to approve a proposed communication facility under a conditional use permit, the planning director shall make the findings required for a conditional use permit, as well as, the following additional findings:

a. The facility complies with all applicable Section 92401.04.

b. The facility either: (1) does not require an RF environmental evaluation report as described in Section 92401.08; or (2) the RF environmental evaluation report for the facility shows that the cumulative radio-frequency energy emitted by the facility and any near-by facilities will be consistent with FCC regulations.

c. The facility blends in with its existing environment and will not have significant adverse visual impacts.

3. Administrative Approval Process. The planning director may administratively approve a proposed communication facility by using the following process:

a. Each applicant for administrative approval shall apply to the planning director providing the information and fees set forth in Section 92401.09.

b. The planning director shall review the application for administrative approval and determine if the proposed use complies with Sections 92401.04 and 92401.05.

c. The planning director shall respond to each such application within sixty (60) days after receiving it by either approving or denying the application.

d. In connection with any such administrative approval, the planning director may, in order to encourage shared use, administratively waive any setback requirements or separation distances between towers in the base zone by up to fifty percent (50%).

e. In connection with any such administrative approval, the planning director may, in order to encourage the use of monopoles, administratively allow the reconstruction of an existing tower to monopole construction.

f. If an administrative approval is denied, the applicant shall file an application for a conditional use permit pursuant to subsection B of this section prior to filing any special appeal that may be available under this title.

4. List of Administratively Approved Uses. The following uses may be approved by the planning director after conducting an administrative review:

a. Locating a tower, antenna or facility, including the placement of additional buildings or other supporting equipment used in connection with the tower or antenna, in any industrial or heavy commercial zone or a grouped facility;

b. Locating antennas or existing structures or towers consistent with the terms of subdivisions (4)(b)(i) and (ii) of this section:

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i. Antennas on Existing Structures. Any antenna, which is not attached to a tower, may be approved by the planning director as an accessory use to any commercial, industrial, professional, institutional, or multifamily structure of eight or more dwelling units, provided:

(A) The antenna does not extend more than thirty (30) feet above the highest point of the structure;

(B) The antenna complies with all applicable FCC and FAA regulations;

(C) The antenna complies with all applicable building codes.

ii. Antennas on Existing Towers. An antenna which is attached to an existing tower may be approved by the planning director and, to minimize adverse visual impacts associated with the proliferation and clustering of towers, collocation of antennas by more than one carrier on existing towers shall take precedence over the construction of new towers, provided such collocation is accomplished in a manner consistent with the following:

(A) A tower which is modified or reconstructed to accommodate to collocation of an additional antenna shall be of the same tower type as the existing tower, unless the planning director allows reconstruction as a monopole.

(B) Height.

(1) An existing tower may be modified or rebuilt to a taller height, not to exceed thirty (30) feet over the tower's existing height, to accommodate the collocation of an additional antenna.

(2) The height change referred to in subsection (A)(4)(b)(ii)(B)(1) of this section may only occur one time per communication tower.

(3) The additional height referred to in subsection (A)(4)(b)(ii)(C)(1) of this section shall not require an additional distance separation. The tower's premodification height shall be used to calculate such distance separation.

(C) Onsite Location.

(1) A tower which is being rebuilt to accommodate the collocation of an additional antenna may be moved onsite within fifty (50) feet of its existing location.

(2) After the tower is rebuilt to accommodate collocation, only one tower may remain on the site.

(3) A relocation onsite tower shall continue to be measured from the original tower location for purposes of calculating separation distances between towers pursuant to the base zone.

(4) The onsite relocation of a tower which comes within the separation distances to residential units or residentially zoned lands shall only be permitted when approved by the planning director;

c. New Towers in Nonresidential Zones. Locating any new tower in a nonresidential zone other than industrial or heavy commercial, provided a licensed professional engineer certifies that the tower can structurally accommodate the number of shared users

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proposed by the applicant; the planning director concludes the tower is in conformity with the goals set forth in Section 92401.00 and the requirements of Section 92401.04; the tower meets all setback and separation requirements of the base zone; and the tower meets the following height and usage criteria:

i. For a single user, up to ninety (90) feet in height,

ii. For two users, up to one hundred twenty (120) feet in height,

iii. For three or more users, up to one hundred twenty (120) feet in height,

iv. For four or more users up to one hundred eighty (180) feet in height;

d. Locating any alternative tower structure in a zone other than industrial or heavy commercial that in the judgment of the planning director is in conformity with the goals set forth in Section 92401.00;

e. Installing a cable microcell network through the use of multiple low-powered transmitters/receivers attached to existing wireline systems, such as conventional cable or telephone wires, or similar technology that does not require the use of towers.

Applicants' Response: Acknowledged.

B. Conditional Use Permit Before the planning commission. All other communication facilities or any facility requiring an exception to these regulations shall require a conditional use permit with a public hearing before the planning commission.

1. Qualifying Facilities. A conditional use permit is required for any communication facility that is not exempt under these regulations and that does not qualify for a conditional use permit before the planning director.

2. Required Findings. In order for the planning commission to approve a proposed communication facility under a conditional use permit, the commission shall make the findings required for a conditional use permit, as well as the following additional findings:

a. No alternative site or design is available that would allow for issuance of a conditional use permit before the planning director for the facility. This finding shall be based on the results of an alternatives analysis, as described in Section 92401.06.

b. The facility either: (1) does not require an RF environmental evaluation report as described in Section 92401.08; or (2) the RF environmental evaluation report for the facility shows that the cumulative radio-frequency exposure emitted by the facility and any near-by facilities will be consistent with FCC regulations.

c. The facility blends in with its existing environment and will not have significant visual impacts.

3. Conditional Use Permit Process. Applications for conditional use permits under this subsection shall conform to the requirements of Section 92401.04 and shall be subject to the procedures and requirements of this title relating to the granting of conditional use permits.

4. Conditions. In granting a conditional use permit, the planning commission may impose conditions to the extent the planning commission concludes such conditions are necessary to minimize any adverse effects of the proposed facilities on adjoining properties.

5. Professional Engineer. Any information of an engineering nature that the applicant submits, whether civil, mechanical or electrical, shall be certified by a licensed professional engineer.

Applicants' Response: Acknowledged.

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92401.06 Alternatives analysis—Information required.

For a facility requiring a conditional use permit before the planning commission, an alternatives analysis shall be prepared by or on behalf of the operator, as described below.

A. Alternatives to be Considered. The alternatives analysis shall consider alternative locations and designs for the proposed facility, including those which would not require a conditional use permit. At a minimum, alternatives included in the analysis shall include: (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County. The alternatives analyzed shall be approved by the planning director. For facilities to be located near an incorporated city, the analysis shall also explain why siting within the city is not possible.

B. Findings. The alternatives analysis shall show whether or not the proposed siting and design would have the least possible environmental and visual effect on the community and whether any alternative site or design is available that would allow for issuance of a conditional use permit before the planning director for the facility.

C. Review. The planning director may, at his or her discretion, employ on behalf of the county an independent technical expert to review this alternative analysis. The operator shall bear the reasonable costs of this review.

Applicants' Response: Please see Attachment 9, Alternative Sites Analysis for further detail of the considered locations. Applicants are open to discussions regarding the design of the proposed facility, if Planning may determine a preferred design.

92401.07 Visual analysis.

For a facility requiring review before the planning commission and located within one-half mile of a designated scenic highway, a visual analysis shall be prepared by or on behalf of the operator, as described below. This visual analysis shall demonstrate compliance with provisions of the Imperial County general plan.

A. Contents. The visual analysis shall include at a minimum the following contents.

1. A map of the visual units (as defined in the scenic highway element) from which the proposed facility will be visible;
2. A map of foreground and distant view components, as defined by the scenic highway element;
3. A narrative discussion of the visual impact of the proposed facility based on the items above.

B. Findings. The visual assessment shall compare the proposed facility's visual impacts to the criteria contained in the Imperial County general plan circulation and scenic highway element. It shall make conclusions as to whether the facility would comply with the element and suggest changes to the facility that would make it more compatible with the element.

Applicants' Response: The proposed WCF is not proposed to be located within one-half mile of a designated scenic highway, unless otherwise determined by Planning staff. However, please see Attachment 13, Photo Simulations for a visual simulation of the proposed tower.

92401.08 Radio-frequency exposure review.

An RF environmental evaluation report shall be prepared for any proposed communication facility meeting the specifications below. In order for a proposed facility that requires an RF environmental evaluation report to be

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approved, the report must demonstrate that RF emissions from the facility in combination with existing RF emissions from nearby facilities will meet the current FCC adopted exposure standard.

A. Facilities Requiring an RF Environmental Evaluation Report. Wireless communication facilities meeting any of the following criteria require an RF environmental evaluation report before they may be permitted under these regulations:

1. Facilities described in Table 1 Section 1.1307 "Transmitters, Facilities and Operations Subject to Routine Environmental Evaluation" of the FCC Rules and Regulations, 47 C.F.R. Section 1.1307, or any superseding regulation;

2. Facilities proposed to be installed within fifty (50) feet of an existing communication facility;

3. Facilities with one or more antenna to be installed less than ten (10) feet above any area that is accessible to untrained workers or the public.

Applicants' Response: Please see Attachment 16, EME Report for documentation of RF emissions.

B. Evaluation Report Requirements. The RE environmental evaluation report shall meet the following requirements:

1. The RF environmental evaluation report is subject to approval of the planning director.

2. The RF environmental evaluation report shall be prepared by a radio-frequency exposure professional.

3. The RF environmental evaluation report shall explicitly state that "operation of the proposed facility in addition to other ambient RF emission levels will not exceed current FCC-adopted standards with regard to human exposure in controlled and uncontrolled areas as defined by the FCC."

4. Assumptions utilized for the calculations of RF exposure shall be conservative in nature and at a minimum be in accordance with the most recent FCC guidance on assessment of RF exposures.

5. The RF environmental evaluation report shall compare RF measurements and/or calculations of RF exposure to the applicable FCC exposure standard. The comparison shall include the power density in micro-watts per square centimeter and as a percentage of the applicable FCC exposure standard.

6. RF field measurements of power density of the proposed facility and/or surrounding facilities are required to be included in the RF environmental evaluation report when:

   a. Adequate technical information regarding other wireless communication facilities that may substantially contribute to RF exposure at the subject site is unavailable;

   b. Calculations of RF exposure indicate the possibility of exposures in excess of the FCC exposure standard; or

   c. So directed by the planning director because of concerns about the number of near-by facilities.

7. All required RF field measurements shall be performed by a radio-frequency exposure professional. Evidence must be submitted showing that the testing instrument(s) used were calibrated within their manufacturer's suggested periodic calibration interval, and that the calibration is by methods traceable to the National Institute of Standards and Technology. Measurements shall be performed in compliance with FCC guidance regarding the measurement of RF emissions and shall be conducted during normal business hours on a non-holiday weekday.

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8. The planning director or his or her designee may monitor the performance of testing required for preparation of the RF environmental evaluation report. The cost of such monitoring shall be borne by the operator.

9. For an amateur radio station facility, self-certification of compliance by the amateur radio station license is acceptable if permitted by FCC regulations and conducted under standards and procedures set forth by the FCC.

Applicants' Response: Acknowledged.

92401.09 Towers.

In addition to any information required for applications for conditional use permits pursuant to this division and this title, applicants for a conditional use permit for a tower shall submit the following information:

A. A scaled site plan clearly indicating the location, type and height of the proposed tower, on-site land uses and base zoning, adjacent land uses, and zoning (including when adjacent to other municipalities), general plan designation of the site and all properties, adjacent roadways, proposed means of access, setbacks from property lines, elevations drawings of the proposed tower and any other structures, topography, parking and other information deemed by the planning director to be necessary to assess compliance with this division;

Applicants' Response: Per correspondence with Planner Derek Newland on January 16, 2025, it was confirmed that the adjacent land uses, zoning, and general plan designation, can be shown on the Alternative Sites Analysis. Please see Attachment 9. Correspondence is included at the end of this document. Access and setbacks are provided on Sheet A1 of Attachment 8, Zoning Drawings, and elevations are provided on Sheet 4.

B. Legal description of the parent tract and leased parcel (if applicable);

Applicants' Response: The legal description of the parent tract and leased parcel are provided on Sheet LS-1 of Attachment 8, Zoning Drawings.

C. The setback distance between the proposed tower and the nearest residential unit, platted residentially zoned properties, and unplatted residentially zoned properties;

Applicants' Response: Please see Figure F in Attachment 9, Alternative Sites Analysis.

D. The separation distance from other towers described in the inventory of existing sites shall be shown on an updated site plan or map. The applicant shall also identify the type of construction of the existing tower(s) and the owner/operator of the existing tower(s), if known;

Applicants' Response: Please see Figure C: Existing Towers within Three Miles in Attachment 9, Alternative Sites Analysis.

E. A landscape plan showing specific landscape materials;

Applicants' Response: No landscape plan is proposed.

F. Method of fencing and finished color, and if applicable, the method of camouflage and illumination;

Applicants' Response: The proposed fence is to be a 6' chain link fence screened with beige, vinyl privacy slats.

G. A description of compliance with Section 92401.04, as well as the provisions of this title, and all other applicable federal, state or local laws;

Applicants' Response: Applicants' have provided a detailed response to all applicable standards and requirements in Section 92401.04 General requirements, and all other applicable federal, state or local laws, as provided in this Statement of Code Compliance.

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H. A notarized statement by the applicant as to whether the construction of the tower will accommodate the collocation of additional antennas for future users;

Applicants' Response: Please refer to Attachment 17 Co-Location Letter of Intent and Attachment 20 – IVECA Public Benefit Agreement confirming that the proposed tower is designed to accommodate the collocation of additional antennas for future users.

I. Identification of the entities providing the backhaul network for the tower(s) described in the application and other cellular sites owned or operated by the applicant in the county;

Applicants' Response: The backhaul for this tower will be provided over a fiber connection arranged by T-Mobile.

J. A description of the suitability of the use of existing towers, other structures or alternative technology not requiring the use of towers or structures.

Applicants' Response: Applicants conducted thorough research on the surrounding existing towers and towers for the proposed facility. There are three existing towers within a 2-mile radius of the site, and none were found to be feasible for the proposed facility. No other structures were found to be adequate for the height and structural integrity required for the proposed facility. Please see Attachment 9, Alternative Sites Analysis for further demonstration of this research.

92401.10 Modifications to facilities.

To the extent necessary to ensure compliance with adopted FCC regulations regarding human exposure to RF emissions, or upon the recommendation of the planning director, the operator shall modify the placement of the facilities; install fencing, barriers or other appropriate structures or devices to restrict access to the facilities; install signage, including the radio-frequency hazard warning symbol identified in ANSI C95.2-1982 and multilingual warnings if deemed necessary by the planning director to notify persons that the facility could cause exposure to RF emissions; and/or implement any other practice reasonably necessary to ensure that the facility is operated in compliance with adopted FCC RF emission standards.

Applicants' Response: The proposed WCF will be designed, constructed, and operated in full compliance with FCC regulations regarding human exposure to RF emissions. Applicants will implement all required mitigation and other safety measures identified in the EME report, prepared by a qualified RF professional to ensure ongoing compliance with federal standards.

92401.11 Changes to FCC standards.

If the FCC RF emission standards are modified, the operator shall ensure that the facility is reevaluated for compliance with the new standards, and a recertification statement prepared by a radio-frequency exposure professional shall be submitted by the operator to the planning director prior to the effective date of the new FCC RF emission standards. For an amateur radio station facility, self-certification of compliance by the amateur radio station license is acceptable if permitted by FCC regulations and conducted under standards and procedures set forth by the FCC.

Applicants' Response: Applicants understand and acknowledge that the proposed WCF must comply with all applicable federal safety standards regarding RF emissions and will ensure ongoing compliance with federal standards.

92401.12 Life of approval.

A. General Term. Permits for communication facilities issued under these regulations shall generally be valid for three years, unless such term is changed through the permitting process.

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Applicants' Response: Under Cal. Gov. Code §65964(b), permit terms of less than 10 years are presumed to be unreasonable absent public safety reasons or substantial land use reasons. Therefore, Applicants respectfully request a minimum permit term of no less than 10 years, in accordance with state law.

B. Co-located facilities. A permit for a new co-located facility at a facility with an existing permit that has more than three years remaining on it shall have the same term as the existing permit. If a permit is issued for a new co-located facility at a facility with an existing permit that has less than three years remaining on it, then the existing permit shall be extended to the same term as the new permit.

Applicants' Response: Applicants acknowledge this requirement. The proposed tower is designed to accommodate co-location of additional antennas, and any co-located facilities will operate under the same permit term in accordance with County Code §92401.12(B).

C. Revocation. If the conditions of a conditional use permit granted under this division are not complied with, the Use Permit may be revoked pursuant to this title of the Codified Ordinances of the county of Imperial.

Applicants' Response: Acknowledged.

D. Renewal. All permits, regardless of the method by which they were originally given, may be extended administratively by the planning director or his or her designee upon verification of the permit-holder's continued compliance with the findings and conditions of approval under which the application was originally approved. As a part of the renewal process, the planning director or his or her designee may require submission of certification by a radio-frequency exposure professional that the facility is being operated in accordance with all applicable FCC standards for RF emissions. At his or her discretion, the planning director or his or her designee may require a public hearing for renewal of a permit for a communication facility under a conditional use permit.

Applicants' Response: Acknowledged.

92401.13 Facilities in existence prior to adoption of these regulations.

Applicants' Response: This section has been omitted as it is not applicable. Applicants are proposing a new freestanding Tower.

92401.14 Public benefit.

In the interest of the county of Imperial and for public benefits including, but not limited to, health and safety law enforcement services, and the greater good of the residents of the county, a public benefit program is herewith established.

The program under direction of the planning director shall secure from all applicants a public benefit service. This may be in the form of a fee, equipment, services or any combination of the above.

In order to implement this program uniformly, the planning director shall secure the input from Imperial Valley Emergency Communication Authority (IVECA).

The planning director shall have the authority to negotiate with any applicant/permittee for a local benefit agreement. This may be in the form of a written contract/agreement or a development agreement or such other instrument acceptable to counsel. Regardless of the vehicle used the final agreement shall be reviewed and approved by the planning commission and their decision shall be final.

The board of supervisors herewith authorizes the planning commission to enter into such agreements.

Applicants' Response: Vertical Bridge has agreed to enter into a Public Benefit Agreement with the IVECA. Please see Attachment 20, IVECA Public Benefit Agreement.

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Chapter 3 LAND USE PERMIT (CONDITIONAL USE PERMIT)

90203.00 Purpose.

The purpose of this chapter is to define and establish guidelines for the processing of a conditional use permit application.

Applicants' Response: Acknowledged.

90203.01 Conditional use permit defined.

A "conditional use permit (CUP)" is a permit issued to a landowner allowing a particular use or activity not allowed as a matter of right within a particular zone. A conditional use permit requires the exercise of judgment and the review of factual issues to determine if the application and resulting limited entitlement will conform to the provisions of this title and is consistent with the general plan. Generally, a conditional use permit consists of a limited entitlement that requires a decision-making body to approve a use subject to conditions or disapprove a particular use, and is in the best interest of public convenience and necessity. A conditional use permit runs with the land for the period of time specified in the permit.

Conditional use permits shall be further classified and defined as follows:

A. Minor Conditional Use Permit (CUP-1). Minor conditional use permits typically allow for the following specific uses.

1. A second dwelling unit (one additional unit);
2. A domestic water well (less than 1.5 acre feet/year), upon and for the use by a single parcel, and for domestic use only;
3. A commercial water well with less than five acre feet of water use per year, and for a single commercial use;
4. A pre-school with less than twenty (20) children;
5. A day care facility with less than twenty (20) children (under the age of six years);
6. A limited care facility for the handicapped or elderly not to exceed five users;
7. Home occupations;
8. Facilities for abused men/women/children provided it does not exceed five users;
9. Temporary real estate, temporary construction and other temporary offices;
10. Limited term special events for limited use.

B. Intermediate Conditional Use Permit (CUP-2). An intermediate conditional use permit shall be a permit issued for a project whose total developed value is greater than one hundred thousand one dollars ($100,001.00), but less than one million dollars ($1,000,000.00), including land cost.

In addition, the following specific projects shall also be considered as intermediate conditional use permit.

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1. Churches or other places dedicated exclusively to religious worship;
2. Educational institutions, including schools (except preschools under subsection A of this section);
3. Hospitals, sanitariums and rest homes, including limited care facilities for handicapped or elderly with a capacity in excess of five people;
4. Facilities for abused men/women/children in excess of five users;
5. Facilities owned or operated by non-profit service organizations for their own use.

C. Major Conditional Use Permit (CUP-3). A major conditional use permit shall be a permit for a project whose total developed value is greater than one million dollars ($1,000,000.00).

It further includes any project that does not fall within subsection A or B of this section.

D. Each conditional use permit listed within the specified zone indicates the level, (i.e., CUP-1 (minor); CUP-2 (intermediate) and CUP-3 (major)).

Applicants' Response: Acknowledged.

90203.02 Conditional use permit limitations.

A conditional use permit may only be processed for a use specifically identified within each zone or sub-zone, and only if the proposed use conforms to the general plan.

Where a specific use is not listed as an outright use or a use that could be allowed by the conditional use permit, within a zone, that use shall be strictly prohibited except as provided by Section 90203.10. Where a proposed use is in conflict with, or does not conform to the county's general plan, it shall be denied.

If in the determination of staff a proposed use is not consistent with the general plan, staff shall inform the applicant prior to an application being deemed complete. If the applicant withdraws the application at this point (prior to the hearing), the applicant shall be entitled to a full refund of all application fees paid to the department, less the actual cost to notice, advertise and staff costs incurred up to the time a withdrawal request is made.

If the applicant does not withdraw and the project proceeds to the commission, the applicant shall not be entitled to any refund.

Applicants' Response: Acknowledged.

90203.03 Application.

A written application (form provided by the planning and development services department) for a conditional use permit shall be filed with the planning and development services department, accompanied by all information identified under Section 90104.00, along with requisite fee(s) and any other information the department deems necessary.

Applicants' Response: Acknowledged.

90203.04 Authority of the planning director.

The planning director is granted authority to investigate, consider, approve and/or deny any minor conditional use permit application. The director acting as a hearing officer shall conduct a duly noticed public hearing and consider all relevant facts, and hear all proponents and opponents. Notice for the hearing shall be provided in accordance with Section 90104.03(A).

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The planning director may administratively, without holding a public hearing, forward a conditional use permit application to the planning commission for hearing.

The planning director shall not have the authority to approve or deny any intermediate or major conditional use permit.

Applicants' Response: Acknowledged.

90203.05 Administrative process by director.

In order to clearly define the administrative process, the following procedures shall be followed by the department/director. This process and its time limits are only applicable to projects that are exempt from CEQA. Any project that requires compliance with CEQA will be processed within the applicable time limits provided by statute.

A. Within ten (10) working days from the receipt of an application, the department shall determine whether the application is complete or incomplete and if found incomplete or inconsistent with the general plan shall return the application to applicant.

B. The department shall within ten (10) working days after deeming the application complete issue a standardized public notice of the proposed project to all property owners as specified in Section 90104.03.

C. Within the ten (10) working days specified under subsection B of this section, the department shall consult with the applicable departments as necessary.

D. An administrative hearing shall be held within thirty (30) working days from the date the application was deemed complete. This hearing shall be open to the public.

E. At the conclusion of the hearing, the director shall approve, conditionally approve or deny the conditional use permit.

F. The director may approve a conditional use permit only if:

1. Findings can be made that the proposed project is consistent with the general plan;
2. Findings can be made that this project is consistent with this title;
3. The director of public works, the director of APCD, director of EHS, and the director of fire/OES have reviewed the proposed project and approved the project;
4. Public opposition has been considered and all impacts have been mitigated by the imposition of conditions;
5. Applicant agrees to all conditions and standards required for the project.

Applicants' Response: Acknowledged.

90203.06 Authority of the planning commission.

The planning commission shall have the authority to investigate, review, and approve or deny any conditional use permit application.

The planning commission's decision shall be final unless an appeal, (if so permitted by this title) is made to the board of supervisors and is filed with the clerk of the board within ten (10) calendar days as provided under Section 90101.10.

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Applicants' Response: Acknowledged.

90203.07 Authority of the board of supervisors.

The board of supervisors shall have the authority to investigate, review, and approve or deny any conditional use permit application upon appeal from the planning commission's decision provided that the appeal is filed according to Section 90101.10. The board of supervisors shall not act upon any conditional use permit that has not first been reviewed by the planning commission and/or that was appealed after the ten (10) day appeal period. The board of supervisors' decision on any conditional use permit shall be final and no reconsideration or rehearing shall be allowed unless such request meets the provisions of Section 90101.10.

Applicants' Response: Acknowledged.

90203.08 Notice of hearing.

After acceptance of a completed conditional use permit application and the completion of a full staff report, the commission shall conduct a public hearing on the request. The notice and scheduling of the public hearing shall be pursuant to Section 90104.03(C).

Applicants' Response: Acknowledged.

90203.09 Action on a conditional use permit.

An application for a conditional use permit shall be reviewed, and approved, conditionally approved, or denied by the decision-making authority.

The authority may approve or conditionally approve an application only if it finds all of the following:

A. The proposed use is consistent with the goals and policies of the adopted county general plan;

B. The proposed use is consistent with the purpose of the zone or sub-zone within which the use will be located;

C. The proposed use is listed as a use within the zone or sub-zone or is found to be similar to a listed conditional use according to the procedures of Section 90203.10;

D. The proposed use meets the minimum requirements of this title applicable to the use and complies with all applicable laws, ordinances and regulations of the county of Imperial and the state of California;

E. The proposed use will not be detrimental to the health, safety, and welfare of the public or to the property and residents in the vicinity;

F. The proposed use does not violate any other law or ordinance;

G. The proposed use is not granting a special privilege.

The decision-making authority shall deny an application if it cannot make all of the above findings.

Applicants' Response: Acknowledged.

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90203.10 Similarity in use(s).

When an applicant proposes a use that is not specifically authorized or listed as a use or conditional use in the specific zone, he or she may apply for a determination of similar use to the planning commission through the following procedure. (The planning commission shall have final authority and no appeal to the board on "similarity" shall be allowed.)

A. Filing. A request for a "similar use" determination shall be in writing to the planning and development services department and shall explain in detail the proposed use and its similarity to an existing approved use within that zone.

B. Application Hearing. A request for similar use consideration shall not be heard concurrently with the hearing for allowing the use. At a minimum, the similar use hearing by the planning commission shall occur at least one hearing prior to the hearing to allow/deny the use.

C. Similar Use Criteria. In order for the planning commission to allow a use to be a similar use it shall first make the following findings:

1. The proposed use resembles or is of the same basic nature as an identified use or a conditional use in that zone.
2. The proposed use includes activities, equipment, or materials typically employed in the identified use.
3. The proposed use has equal to or less impacts on traffic, noise, dust, odor, vibration and appearance than the identified listed use.
4. All impacts identified could and would be mitigated through conditions.
5. The similar use, if allowed in the proposed zone, will not affect the health, safety and welfare of the public or impact the property and residents in the vicinity.

D. Noncomparison of Similar Use. An application for similar use shall be a comparison of the proposed use against that of an identified listed use in the zone or sub-zone. The commission shall not compare a proposed similar use against another previously approved similar use.

E. Continued Use. Once a use has been found to be similar by the commission, it shall be listed as such by the department within the applicable zoning division of this title and may be used by other applicants.

F. CEQA Exemption. The determination of similar use shall be a ministerial action and shall not require CEQA documentation.

Applicants' Response: Acknowledged.

90203.11 Terms/conditions.

The conditional use permit shall contain such terms and conditions that the decision-making authority determines necessary, and/or are conditions that mitigate specific impacts, and can make the appropriate findings.

Every permit approval shall contain both standard, as well as, site specific conditions. Among the standard conditions shall be:

A. Compliance with all laws;

B. Cost to offset on-going compliance mandates;

C. Time limitations;

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D. Effective date(s).

Applicants' Response: Acknowledged.

90203.12 Effective date.

The approved conditional use permit shall not become effective until ten (10) calendar days after the decision of the planning director or commission. Further the conditional use permit shall not be effective until applicable conditions have been met, and the conditional use permit is recorded with the county recorder, with payment of recording fees being paid by applicant. In the case of a decision by the board of supervisors there is no ten (10) day appeal.

Applicants' Response: Acknowledged.

90203.13 Time limit/extensions.

If the project for which a conditional use permit has been approved has not commenced, or permits for said project have not been issued, within one year from approval date the conditional use permit shall be null and void. If a conditional use permit has been unused, abandoned, discontinued, or ceased for one year, the conditional use permit shall be null and void, and be of no effect. Notice to applicant/permittee under this division will not be required or provided by department.

If an applicant cannot initiate or obtain permits for the approved use during the one year, applicant may request a one year extension from the department. The request for an extension shall be in writing and be submitted with explanation to the planning and development services department at least sixty (60) days prior to the end of the one-year period. The director shall have the authority to extend the initial start up period of a conditional use permit two times for a maximum of one year each. No extension under this section shall be extended for more than two years.

Applicants' Response: Acknowledged.

90203.14 Monitoring/compliance.

Every conditional use permit shall be monitored by the planning and development services department with assistance from other departments as necessary. The permittee shall be required to pay for such monitoring costs according to the "time and materials" fee schedule adopted by the board of supervisors or as otherwise provided by the terms of the conditional use permit.

Permittee shall at all times be in compliance with all of the terms and conditions of the conditional use permit. In the event noncompliance is found, the permittee shall be given notice to correct by the planning and development services department. Failure to comply shall constitute grounds for revocation.

Applicants' Response: Acknowledged.

90203.15 Modifications/amendments.

All terms/conditions of approval shall be final. A request to delete, modify or change one or more condition(s) shall constitute a new application unless specifically allowed within the CUP. Such a modification only be considered at a regularly scheduled hearing of the decision-making authority.

Applicants' Response: Acknowledged.

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90203.16 Revocation/suspension.

A conditional use permit may be suspended or revoked by the planning director, planning commission or board of supervisors for any of the following causes:

A. Any term or condition has not been complied with and the permittee has received at least one written correction order, via certified or return receipt mail or personal delivery;

B. The property or portion thereof subject to the conditional use permit is used or maintained in violation of the conditional use permit and/or any state law or ordinance of the Imperial County and/or state of California;

C. The use for which the conditional use permit was granted has been so exercised as to be detrimental to the public health or safety or as to constitute a nuisance;

D. Changes in technology in the type or amount of development in the area, or other condition warrants a modification of the conditions of operation, or warrants the imposition of additional conditions to assure that the use remains compatible with existing and potential uses within the vicinity.

Applicants' Response: Acknowledged.

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CHAPTER 2 LAND USE PERMITS (VARIANCE)

90202.00 Purpose.

The purpose of this chapter is to define and establish guidelines for the processing of applications for variances.

Applicants' Response: Acknowledged.

90202.01 Variance defined.

A "variance" is an approval granted upon a legal parcel of land to construct a structure not otherwise directly allowed by the exact interpretation of Title 9, Divisions 1 through 8. A variance runs with the land and allows for minimal deviation from the standards.

Applicants' Response: Acknowledged.

90202.02 Variance limitation.

As an example the variance procedure shall not be used for any of the following:

A. To reduce or change the minimum parcel size required for a new land division;

B. To authorize land uses other than those specified or allowed under the specific land use categories as identified in this title;

C. To change the meaning or intent of a word/phrase listed within this title.

Applicants' Response: Acknowledged.

90202.03 Application.

A written application (form provided by planning and development services department) for a variance shall be filed with the department, accompanied by all information required under Section 90104.00, along with requisite fee and any other information the department deems necessary.

Applicants' Response: Acknowledged.

90202.04 Authority of the planning director.

The planning director is granted authority to investigate, consider, approve and/or deny a variance application. The director, acting as a hearing officer, shall conduct a noticed public hearing (ref. Section 90104.03(A)) and consider all relevant facts, and hear all proponents, and opponents.

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The planning director may deny a variance administratively without holding a public hearing. Such a denial constitutes an automatic appeal to the planning commission for which the applicant shall not be required to pay the appeal fee.

Following a noticed hearing by the planning director, any party may appeal the director's decision to the planning commission, provided any such appeal is filed within ten (10) calendar days from the date of decision and is in accordance with the procedures specified in Sections 90102.04 and 90102.05.

Applicants' Response: Acknowledged.

90202.05 Administrative process by director.

In order to streamline the review process and clearly delineate the standards and rules, the following administrative procedure is established and shall be followed by the department for processing a variance application:

A. Within ten (10) days of receipt, the application shall either be deemed complete or be returned to the applicant with a written explanation if deemed incomplete.

B. Within ten (10) days from the date the application is deemed complete, a standardized public notice of pending variance shall be sent to all property owners pursuant to Section 90104.03.

C. During the same ten (10) day period as provided in subsection B of this section, the department will consult with the department of public works, and fire/OES and other applicable departments.

D. An administrative hearing shall be held within thirty (30) days from the date the application was deemed complete. This hearing shall be open to the public.

E. At the conclusion of the hearing, the director shall approve, conditionally approve or deny the variance. The director may continue the hearing, or the decision for up to ten (10) days, if necessary.

F. The director may approve a variance only if the findings can be made under Section 90202.08 and with a written concurrence from the director of public works and the director of fire/OES department.

G. Following the administrative hearing there shall be a ten (10) calendar day period during which any party may appeal the decision of the director to the planning commission. No construction or other county permits shall be approved until the ten (10) day appeal period has terminated and no appeal has been filed.

Applicants' Response: Acknowledged.

90202.06 Authority of planning commission.

The planning commission, upon appeal, shall have the authority to grant or deny a variance. No appeal from the director's decision shall be allowed to the board of supervisors unless and until the commission has reached a decision.

Applicants' Response: Acknowledged.

90202.07 Notice of hearing.

After acceptance of a completed variance application and the completion of a staff report, the commission shall conduct a public hearing on the variance request. The notice and scheduling of the public hearing shall be pursuant to Section 90104.03(C).

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Applicants' Response: Acknowledged.

90202.08 Action on a variance.

The planning director, the planning commission and/or the board of supervisors, shall approve, approve subject to conditions or disapprove a variance with the following findings:

A. Findings. Approval or conditional approval may be granted only if the director/commission/board of supervisors first determines that the variance satisfies the criteria set forth in Government Code Section 65906, and the following findings can be made:

1. That there are special circumstances applicable to the property described in the variance application, that do not apply generally to the property or class of use in the same zone or vicinity;

Applicants' Response: The proposed wireless communications facility (WCF) would be located on APN 045-600-017. The parcel is zoned A-1 and is currently used primarily for residential and light agricultural purposes. Based on analysis by T-Mobile's RF engineers and Applicant research, this site was determined to be the most suitable location to meet the identified coverage objectives.

The proposed WCF is intended to provide continuous and improved wireless coverage throughout the City of Holtville. At present, this area is served by an existing T-Mobile tower at 32.8033, -115.3744, which does not provide adequate coverage to the north and northeast portions of the City. The new facility is specifically designed to enhance both voice and data services for the Holtville community, including Norrish Road, Holtville High School, Underwood Road, surrounding residential neighborhoods, commercial areas, and parks. Locating the facility closer to these denser population areas will reduce in-vehicle dropped calls and service interruptions, thereby maximizing coverage for the greatest number of residents and visitors.

The use of this parcel for a WCF represents a specialized use not generally applicable to other properties in the same zoning district. In accordance with §92401.04(5)(a), communication facilities must be constructed to the minimum functional height, with allowances for co-location unless a variance is approved concurrent with a CUP. The proposed tower has been designed at the lowest feasible height for T-Mobile's equipment and to accommodate up to three co-located wireless carriers.

The requested additional height of 70 feet (including the lightning rod), and the associated variance, are necessary to provide sufficient and reliable coverage to the surrounding community. Please see Attachment 15, T-Mobile Coverage and Engineering Justification, for supporting technical analysis.

2. That the granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvements in such zone or vicinity in which the property is located;

Applicants' Response: The proposed wireless tower will not be materially detrimental to the public welfare or injurious to the property. The WCF will be operated in compliance with the RF emission standards set forth by the FCC. Please see Attachment 16, EME Report. In the unlikely of a structural failure, standard engineering of wireless communication facilities incorporates a break point design to ensure that the tower would collapse within the leased compound and not extend beyond the property boundary. The proposed WCF will not limit or prohibit improvements in this zone and will develop only within the 40'x40' footprint of the lease area.

3. That because of special circumstances applicable to subject property, including size, shape, topography, location or surroundings, the strict application of zoning laws is found to deprive subject property of privileges enjoyed by other properties in the vicinity and under identical zone classifications;

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Applicants' Response: The subject parcel (APN 045-600-017) is located within the A-1 zone, where the maximum allowable height is 60 feet. While wireless communications facilities are permitted in this zone, the height required for the proposed tower exceeds this limit and therefore requires a variance.
This parcel is uniquely suited for the proposed facility due to its location near residential areas and community-serving uses, while still providing adequate space and meeting required setbacks. The RF-targeted search ring includes parcels within the R-1-U, M-1-U, C-2-U, A-1-U, and one parcel in the A-2-U zone. Although A-2 parcels to the north allow structures up to 120 feet in height, their distance from Holtville's population center would not achieve the same coverage objectives and would increase aviation conflicts due to active agricultural operations and low-flying crop dusters.
By contrast, the proposed facility would not be located within agricultural fields, reducing aviation risks, while also placing coverage closer to the denser population areas of Holtville. Applicants evaluated co-location opportunities as well as 24 alternative parcels, and this site was determined to be the most appropriate based on zoning compatibility and the property owner's willingness to lease.
Strict enforcement of the 60-foot height limit would deprive this parcel of the ability to host a wireless facility comparable to those that could be permitted on nearby A-2 properties at heights up to 120 feet. Without the variance, this parcel—despite being the most suitable site identified—could not provide the reliable wireless coverage needed for the Holtville community at the necessary 130' (including the lightning rod).

4. That the granting of such variance will not adversely affect the comprehensive general plan.

Applicants' Response: The proposed WCF is consistent with the Urban Plan designation of the area. As stated in the Land Use Element, Urban areas are "characterized by a full level of urban services, in particular public water and sewer systems, and contain or propose a broad range of residential, commercial, and industrial uses" (pg. 3). The proposed WCF will provide improved coverage and access to wireless connectivity to the growing City of Holtville and the unincorporated area of Imperial County. It will provide opportunity for economic and community growth and therefore is consistent with this plan area.

B. Conditions of Approval. In approving a variance, the director/commission/board of supervisors may impose such conditions deemed necessary to enable making the findings listed under subsection A of this section.

Applicants' Response: Acknowledged

C. Denial of Variance. Where the director/commission/board of supervisors cannot make the findings under subsection A of this section (with or without conditions) the variance shall be denied.

(***Applicants' Response: Acknowledged.***

90202.09 Effective date of variance.

The approval of a variance shall become final and effective for purpose of construction permit issuance, on the eleventh day after the action of the director unless an appeal is filed within ten (10) days from the date of his or her decision.

The approval of a variance by the commission shall become effective on the eleventh day after the commission action granting the variance, unless an appeal is filed to the board of supervisors within ten (10) days. The approval of a variance by the board of supervisors becomes final on the day of the board's action.

Applicants' Response: Acknowledged.

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90202.10 Time limit/extension.

An approved variance shall be valid for a period of twelve (12) months from effective date. At the end of such time period the variance shall become null and void unless:

A. A construction permit has been issued;

B. The project is complete and the use continues;

C. A time limit extension by the director has been granted in writing.

At any time the variance ceases to be used for a period of twelve (12) months, or the use upon which the original approval was granted has ceased or changed, the variance shall become null and void, without notice from the planning and development services department.

If an extension is necessary it must be requested at a minimum of sixty (60) days prior to its expiration date and must state in writing the reasons for the extension. The planning director may extend any variance upon written request without notice or hearing. Under no condition shall a variance be extended or renewed after it has expired or if the property covered by the variance is in violation of this title.

Applicants' Response: Acknowledged.

90202.11 Revocation/modification.

Any variance issued pursuant to this title may be revoked by the planning commission after a duly noticed public hearing in which the commission has found that subject variance is in violation of this title or applicable statutory law, or if it constitutes a health or safety hazard. The commission may also modify a variance through the public hearing process if it determines a necessity for public health or safety considerations.

Applicants' Response: Acknowledged.

END OF STATEMENT OF CODE COMPLIANCE.

PC ORIGINAL PKG

From: **Samantha Herrmann** sherrmann@assurance-group.com
Subject: Re: Vertical Bridge Tower Pre-Application (CA-5363)
Date: August 20, 2025 at 12:45 PM
To: Melissa Keith mkeith@assurance-group.com

From: Derek Newland <DerekNewland@co.imperial.ca.us>
Date: Thursday, January 16, 2025 at 10:26 AM
To: Samantha Herrmann <sherrmann@assurance-group.com>
Cc: Melissa Keith <mkeith@assurance-group.com>
Subject: RE: Vertical Bridge Tower Pre-Application (CA-5363)

Good morning Samantha,
I have reviewed your questions and the answer to both are yes, that's fine.

Thank you,

Derek Newland
Planner III
County of Imperial
Planning and Development Services
dereknewland@co.imperial.ca.us
(442) 265-1736

From: Samantha Herrmann <sherrmann@assurance-group.com>
Sent: Thursday, January 9, 2025 11:08
To: Derek Newland <DerekNewland@co.imperial.ca.us>
Cc: Melissa Keith <mkeith@assurance-group.com>
Subject: Re: Vertical Bridge Tower Pre-Application (CA-5363)

CAUTION: This email originated outside our organization; please use caution.
Hi Derek,

I hope you had a lovely holiday season & are having a happy new year. I have a few questions regarding this project and the code, if you could assist with this, that would great. Feel free to give me a call if that is more convenient.

- Per Code Section 92404.01 - General Requirements:
  - Q. Inventory of Existing Sites. Each applicant for a facility shall provide to the planning director an inventory of its existing towers, antennas, or sites approved for facilities, that are either within the jurisdiction of Imperial County or within one mile of the border thereof, including specific information about the location, height and design of each facility. The planning director may share such information with other applicants applying for administrative approvals or special use permits under this ordinance or other organizations seeking to locate facilities within the jurisdiction of Imperial County, provided, however that the planning director is not, by sharing such information, in any way representing or warranting that such sites are available or suitable.
    - **We think that the towers within our search ring would be the most relevant to our project, and the carrier does not typically provide the inventory of all sites within the county. Is this requirement something that can be fulfilled with the towers within our immediate search area?**

- 92409.01 - Information required
  - A. A scaled site plan clearly indicating the location, type and height of the proposed

tower, on-site land uses and base zoning, adjacent land uses and zoning (including when adjacent to other municipalities), general plan designation of the site and all properties, adjacent roadways, proposed means of access, setbacks from property lines, elevations drawings of the proposed tower and any other structures, topography, parking and other information deemed by the planning director to be necessary to assess compliance with this ordinance.

- **Do the adjacent land uses and zoning/general plan designation need to be shown on the site plan, or can this be represented on a separate map? We currently have this information shown in the Alternative Sites document.**

Thank you,

--

SAMANTHA HERRMANN
Site Acquisition - Planning

ASSURANCE DEVELOPMENT

CELL 310 488 6237
FAX 626 322 0880
WEB assurance-development.com

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ASSURANCE
DEVELOPMENT

Attachment 8

Zoning Drawings *(Revised)*

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PC ORIGINAL PKG

PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 120' MONOPOLE WITH (11) 8' ANTENNAS, (12) RRU'S, (1) 3' MICROWAVE, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) BACK-UP DIESEL GENERATOR, (1) 10'x15' ICE CANOPY, (2) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON H-FRAME WITHIN A 40'x40' FENCED LEASE AREA. NO WATER OR SEWER SERVICE IS REQUIRED. THIS WILL BE AN UNMANNED FACILITY.

CODE COMPLIANCE:

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

1. 2022 CALIFORNIA BUILDING CODE
2. 2022 CALIFORNIA TITLE 24
3. 2022 CALIFORNIA FIRE CODE
3. 2022 CALIFORNIA ELECTRIC CODE
4. 2022 CALIFORNIA ENERGY CODE
5. 2022 CALIFORNIA MECHANICAL CODE
6. TIA/EIA-222-H OR LATEST EDITION
5. ANY LOCAL BUILDING CODE AMENDMENTS TO THE ABOVE
6. CITY/COUNTY ORDINANCES

vertical bridge

US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

120' MONOPOLE

TENANT SITE ID: SD07772

APPROVAL BLOCK				
		APPROVED	APPROVED AS NOTED	DISAPPROVED REVISE
VERTICAL BRIDGE	DATE	☐	☐	☐
SITE ACQUISITION	DATE	☐	☐	☐
CONSTRUCTION MANAGER	DATE	☐	☐	☐
PERMITTING	DATE	☐	☐	☐
RF ENGINEERING	DATE	☐	☐	☐



VICINITY MAP
N.T.S.

DRAWING INDEX	
DRWG. #	TITLE
T1	TITLE SHEET
LS-1	TITLE DETAILS
LS-2	TOPOGRAPHIC SURVEY
A1	SITE PLAN
A2	ENLARGED COMPOUND PLAN
A3	EQUIPMENT AND ANTENNA PLAN
A4	ELEVATIONS



LOCATION MAP
N.T.S.

PROJECT INFORMATION	
SITE NAME:	HOLTVILLE
SITE NUMBER:	US-CA-5363
TENANT SITE ID:	SD07772
SITE ADDRESS:	1734 E UNDERWOOD RD. UNIT 2 HOLTVILLE, CA 92250
PARCEL #:	045-600-017
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-1 LIMITED AGRICULTURAL (IMPERIAL COUNTY)
ZONING JURISDICTION:	IMPERIAL COUNTY
CONSTRUCTION TYPE:	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE:	MONOPOLE
STRUCTURE HEIGHT:	120'
CONSTRUCTION AREA:	1,600 SQ. FT.
GROUND ELEVATION:	-21.93' (NAVD88)
LATITUDE (NAD 83):	32.821736° (32° 49' 18.25" N)
LONGITUDE (NAD 83):	-115.386383° (115° 23' 10.98" W)

EMERGENCY:
CALL 911

DIGALERT UNDERGROUND SERVICE ALERT
(800) 642-2444
WWW.CALIFORNIA811.ORG
CALL 2 TO 14 WORKING DAYS UTILITY NOTIFICATION PRIOR TO CONSTRUCTION
811

PROJECT DIRECTORY	
PROPERTY OWNER:	GONZALES JESUS DIAZ & PRISCILLA (JT) 1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
APPLICANT:	VERTICAL BRIDGE 22 W ATLANTIC AVE, #310 DELRAY BEACH, FL | 33444
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE: 626.765.5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT
TELCO COMPANY:	AT&T

CLIENT

verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
3	WPG COMMENTS	APP	09/19/25
2	WPG COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/19/25
E	ISSUED FOR ZONING	JR	05/30/24
A	ISSUED FOR REVIEW	CV	05/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

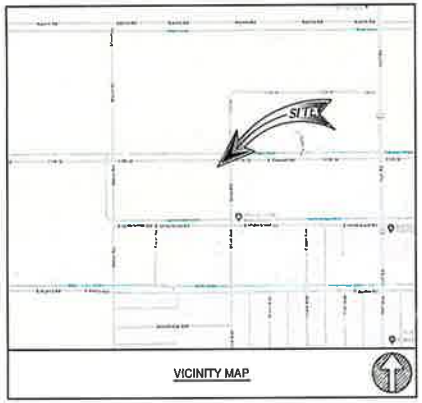
DRAWING TITLE
TITLE SHEET

DRAWING SCALE: AS NOTED
DATE: 09/04/25
ZD

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DRAWING NUMBER
T1

PC ORIGINAL PKG



REFERENCE MAP

1. MAP NO. 908
THE TOWN OF HOLTVILLE
BOOK 12 PAGE 471
FILED JUNE 22, 1925

APN

045-600-017, IMPERIAL COUNTY, CALIFORNIA

RECORD OWNER

JESUS D. GONZALES AND PRISCILLA GONZALES, HUSBAND AND WIFE, AS JOINT TENANTS

TITLE REPORT

PRELIMINARY TITLE REPORT WAS PREPARED BY IRON CREST NATIONAL TITLE COMPANY WITH FILE NO IC-TYR-174873-C WITH EFFECTIVE DATE JULY 31, 2024

BASIS OF ELEVATIONS: (NAVD 1988)

SITE ELEVATIONS ARE ESTABLISHED FROM THE GPS DERIVED ORTHOMETRIC HEIGHTS BY APPLICATION OF NGS "GEOID 12A" MODELED SEPARATIONS TO ELLIPSOID HEIGHTS DETERMINED BY OBSERVATIONS OF THE "LEICA SMARTNET" REAL TIME NETWORK. ALL ELEVATIONS SHOWN HEREON ARE REFERENCED TO NAVD88, CALIFORNIA ZONE 6.

FLOOD ZONE

SITE IS LOCATED IN FLOOD ZONE "X" AS PER F.I.R.M. MAP NO. 06025C1734C EFFECTIVE DATE 9/26/2008.

LEGAL DESCRIPTION

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF IMPERIAL, STATE OF CA, AND IS DESCRIBED AS FOLLOWS:

LOT 65 OF THE TOWNSITE OF HOLTVILLE, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP NO. 908, ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, A COPY OF SAID MAP BEING ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF IMPERIAL COUNTY, TOGETHER WITH THE WEST 40 FEET OF OLIVE AVENUE, LYING SOUTH OF THE SOUTH LINE OF THIESEN ROAD AND NORTH OF THE NORTH LINE OF UNDERWOOD ROAD, AS SET FORTH IN THAT CERTAIN RESOLUTION VACATING SAID STREET, AS RECORDED JUNE 22, 1925 IN BOOK 73, PAGE 471 OF OFFICIAL RECORDS.

PARCEL ID: 045-600-017-000

THIS BEING THE SAME PROPERTY CONVEYED TO JESUS D. GONZALES, A MARRIED MAN AS HIS SOLE AND SEPARATE PROPERTY, WHO ACQUIRED TITLE AS JESUS DIAZ GONZALES FROM PRISCILLA GONZALES, A MARRIED WOMAN IN A DEED DATED JUNE 14, 1993 AND RECORDED JUNE 23, 1993 AS INSTRUMENT NO. 93014184 IN IMPERIAL COUNTY, CA.

THIS FURTHER BEING CONVEYED TO JESUS D GONZALES AND PRISCILLA GONZALES, HUSBAND AND WIFE, AS JOINT TENANTS IN A DEED DATED SEPTEMBER 25, 1996 AND RECORDED OCTOBER 3, 1996 IN BOOK 1863 AND PAGE 1760 IN IMPERIAL COUNTY, CA.

SCHEDULE B (EXCEPTIONS)

1. ANY DEFECT, LIEN, ENCUMBRANCE, ADVERSE CLAIM, OR OTHER MATTER THAT APPEARS FOR THE FIRST TIME IN THE PUBLIC RECORDS OR IS CREATED, ATTACHES, OR IS DISCLOSED BETWEEN THE COMMITMENT DATE AND THE DATE ON WHICH ALL OF THE SCHEDULE B, PART I—REQUIREMENTS ARE MET.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

2. (A) TAXES OR ASSESSMENTS THAT ARE NOT SHOWN AS EXISTING LIENS BY THE RECORDS OF ANY TAXING AUTHORITY THAT LEVIES TAXES OR ASSESSMENTS ON REAL PROPERTY OR BY THE PUBLIC RECORDS. (B) PROCEEDINGS BY A PUBLIC AGENCY THAT MAY RESULT IN TAXES OR ASSESSMENTS, OR NOTICES OF SUCH PROCEEDINGS, WHETHER OR NOT SHOWN BY THE RECORDS OF SUCH AGENCY OR BY THE PUBLIC RECORDS.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

3. ANY FACTS, RIGHTS, INTERESTS, OR CLAIMS THAT ARE NOT SHOWN BY THE PUBLIC RECORDS BUT THAT COULD BE ASCERTAINED BY AN INSPECTION OF THE LAND OR THAT MAY BE ASSERTED BY PERSONS IN POSSESSION OF THE LAND.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

4. EASEMENTS, LIENS OR ENCUMBRANCES, OR CLAIMS THEREOF, NOT SHOWN BY THE PUBLIC RECORDS.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

5. DISCREPANCIES, CONFLICTS IN BOUNDARY LINES, SHORTAGE IN AREA, ENCROACHMENTS, OR ANY OTHER FACTS WHICH A CORRECT SURVEY WOULD DISCLOSE, AND WHICH ARE NOT SHOWN BY THE PUBLIC RECORDS.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

6. (A) UNPATENTED MINING CLAIMS, (B) RESERVATIONS OR EXCEPTIONS IN PATENTS OR IN ACTS AUTHORIZING THE ISSUANCE THEREOF, (C) WATER RIGHTS OR CLAIMS OR TITLE TO WATER, WHETHER OR NOT THE MATTERS EXCEPTED UNDER (A), (B) OR (C) ARE SHOWN BY THE PUBLIC RECORDS.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

7. ANY LIEN OR RIGHT TO A LIEN FOR SERVICES, LABOR OR MATERIAL UNLESS SUCH LIEN IS SHOWN BY THE PUBLIC RECORDS AT DATE OF POLICY.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

8. ANY CLAIM TO (A) OWNERSHIP OF OR RIGHTS TO MINERALS AND SIMILAR SUBSTANCES, INCLUDING BUT NOT LIMITED TO OILS, METALS, COAL, LIGNITE, OIL, GAS, GEOTHERMAL RESOURCES, URANIUM, CLAY, ROCK, SAND AND GRAVEL LOCATED IN, ON, OR UNDER THE LAND OR PRODUCED FROM THE LAND, WHETHER SUCH OWNERSHIP OR RIGHTS ARISE BY LEASE, GRANT, EXCEPTION, CONVEYANCE, RESERVATION, OR OTHERWISE; AND (B) ANY RIGHTS, PRIVILEGES, IMMUNITIES, RIGHTS OF WAY, AND EASEMENTS ASSOCIATED THEREWITH OR APPURTENANT THERETO, WHETHER OR NOT THE INTERESTS OR RIGHTS EXCEPTED IN (A) OR (B) APPEAR IN THE PUBLIC RECORDS OR ARE SHOWN IN SCHEDULE B.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

9. ANY AND ALL MATTERS DISCLOSED ON THE MAP ENTITLED "MAP OF THE TOWN OF HOLTVILLE" DATED JUNE 7, 1904 AND RECORDED JUNE 7, 1904 IN , (INSTRUMENT) 908 IN IMPERIAL COUNTY, CALIFORNIA.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

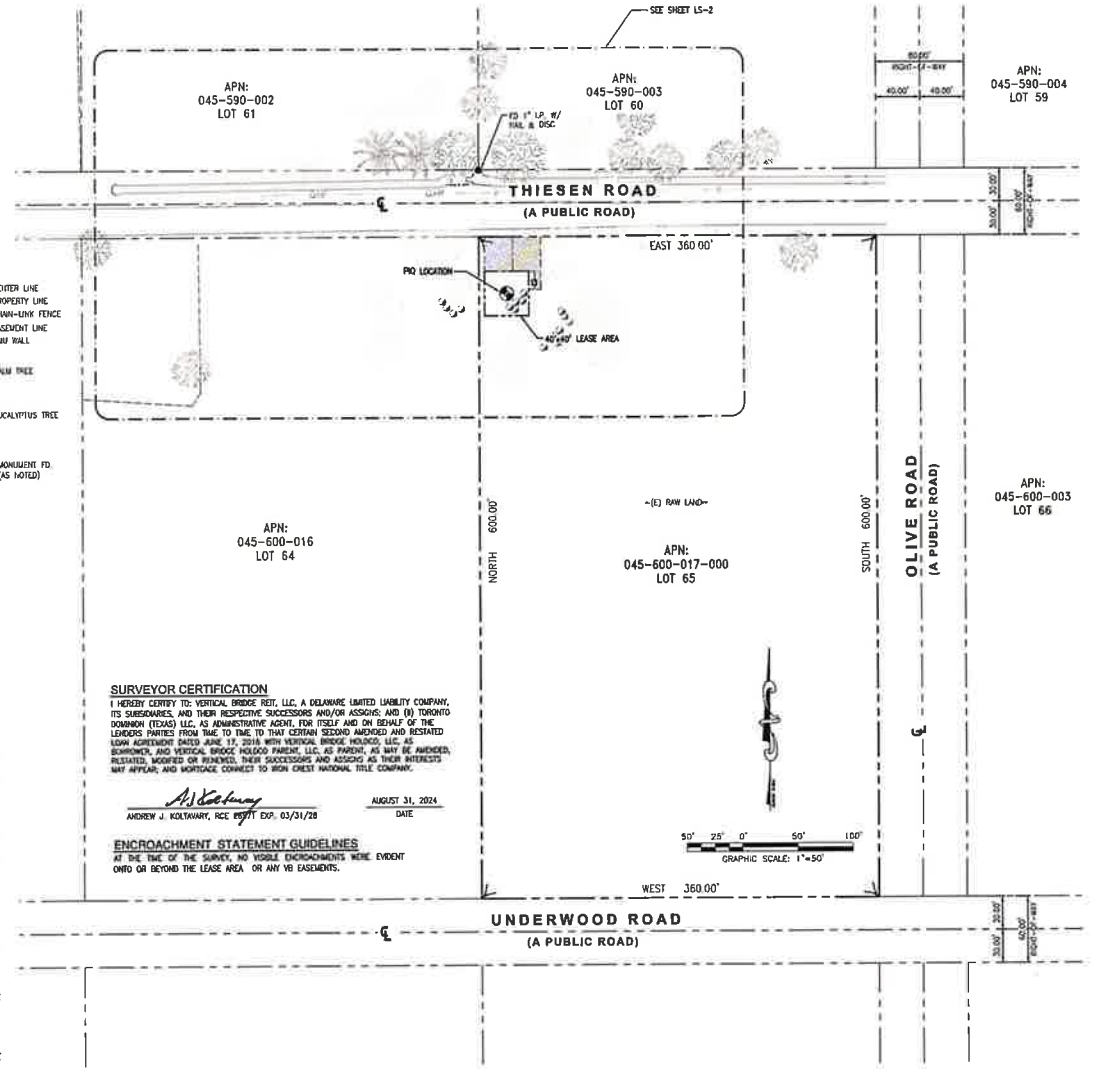
10. RIGHTS OF FEE SIMPLE OWNERS IN AND TO THE SUBJECT PROPERTY.
(THE EXCEPTION IS A STANDARD EXCEPTION AND NOT THE TYPE TO BE DEPICTED HEREON)

LEGEND

- CENTER LINE
- PROPERTY LINE
- CHAIN-LINK FENCE
- EASEMENT LINE
- CMU WALL
- PALM TREE
- EUCALYPTUS TREE

MONUMENTS

- MONUMENT FD. (AS NOTED)



SURVEYOR CERTIFICATION

I HEREBY CERTIFY TO: VERTICAL BRIDGE REIT, LLC, A DELAWARE LIMITED LIABILITY COMPANY, ITS SUBSIDIARIES, AND THEIR RESPECTIVE SUCCESSORS AND/OR ASSIGNS; AND (B) TORONTO DOMINION (TEXAS) LLC, AS ADMINISTRATIVE AGENT, FOR ITSELF AND ON BEHALF OF THE LENDERS PARTIES FROM TIME TO TIME TO THAT CERTAIN SECOND AMENDED AND RESTATED LOAN AGREEMENT DATED JUNE 17, 2016 WITH VERTICAL BRIDGE HOLDCO, LLC, AS BORROWER, AND VERTICAL BRIDGE HOLDCO PARENT, LLC, AS PARENT, AS MAY BE AMENDED, RESTATED, MODIFIED OR REMIXED, THEIR SUCCESSORS AND ASSIGNS AS THEIR INTERESTS MAY APPEAR; AND MORTGAGE CONNECT TO IRON CREST NATIONAL TITLE COMPANY.

ANDREW J. KOLTAVARY, RCE 89371 EXP. 03/31/28

AUGUST 31, 2024
DATE

ENCROACHMENT STATEMENT GUIDELINES

AT THE TIME OF THE SURVEY, NO VISIBLE ENCROACHMENTS WERE EVIDENT ONTO OR BEYOND THE LEASE AREA OR ANY VB EASEMENTS.

SURVEY PREPARED FOR:

verticalbridge

VB BTS II, LLC

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.216.2024

ENGINEER

AJK

34 RECODO
IRVINE, CA 92620
714.624.9427

NO.	SUBMITTAL / REVISION	BY	DATE
3	FINAL SURVEY	LA	08/31/24
1	INCORPORATED TITLE REPORT	LA	08/26/24
0	PRELIMINARY SURVEY	LA	08/12/24

DRAWN: LA
DESIGNED:
CHECKED: AJK

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
HOLTVILLE

1734 E. UNDERWOOD RD.,
HOLTVILLE, CA 92250-9642
IMPERIAL COUNTY

ENGINEER STAMP:



DRAWING TITLE:

TITLE DETAILS

DRAWING SCALE: AS NOTED

DATE: 08/31/2024

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DRAWING NUMBER:

LS-1

PC ORIGINAL PKG

LEGEND

	CENTER LINE	TB	TOP OF BUILDING
	PROPERTY LINE	BW	BACK OF WALK
	WIRED FENCE	TPOB	TRUE POINT OF BEGINNING
	WOODEN FENCE	POB	POINT OF BEGINNING
C C	CONDUIT	AGL	ABOVE GRADE LEVEL
OH OH	OVERHEAD ELECTRICAL LINE		EXISTING STREET LIGHT
	SEWER LINE		EXISTING SIGN
	CMU WALL		GUY WIRE
EG	EXISTING GRADE		POWER POLE
EP	EDGE OF PAVEMENT		FIRE HYDRANT
FS	FINISH SURFACE		PINE TREE
HT	HEIGHT		EUCALYPTUS TREE
TC	TOP OF CURB		BUSHES
FL	FLOW LINE		
TT	TOP OF TREE		

MONUMENTS

● MONUMENT FD. (AS NOTED)

COORDINATES

32°49'18.25" N (32.821736°)
115°23'10.98" W (-115.386383°)

NOTES:

1. THIS IS NOT A BOUNDARY SURVEY. THIS IS A SPECIALIZED TOPOGRAPHIC MAP. THE PROPERTY LINES AND EASEMENTS SHOWN HEREON ARE FROM RECORD INFORMATION AS NOTED HEREON. AJK ENGINEERING AND SURVEY TRANSLATED THE TOPOGRAPHIC SURVEY TO RECORD INFORMATION USING FOUND MONUMENTS SHOWN HEREON.
2. THE HEIGHTS AND ELEVATIONS FOR THE TREES, BUSHES AND OTHER LIVING PLANTS SHOWN HEREON, SHOULD BE CONSIDERED APPROXIMATE (+/-) AND ONLY FOR THE DATE OF THIS SURVEY. THEY ARE PROVIDED AS A GENERAL REFERENCE AND SHOULD NOT BE USED FOR DESIGN PURPOSES.
3. FIELD SURVEY COMPLETED ON AUGUST 07, 2024.
4. ACCESS AND UTILITY EASEMENTS TERMINATE AT A CONFIRMED PUBLIC RIGHT OF WAY.
5. NO VISIBLE ENCROACHMENTS WERE VISIBLE ON THE LEASE OR EASEMENT AREAS AT THE TIME OF THE SURVEY.
6. THE LEASE AND EASEMENT AREA LIE ENTIRELY WITHIN THE PARENT OR ACCESS PARCEL.

LEASE AREA

A PARCEL OF LAND LYING WITHIN THAT PORTION OF LOT 65 OF THE TOWNSITE OF HOLTVILLE, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP NO. 908, ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID LOT 65;
THENCE NORTH 90°00'00" EAST 5.00 FEET;
THENCE SOUTH 00°00'00" WEST 30.00 FEET TO THE **TRUE POINT OF BEGINNING**;
THENCE NORTH 90°00'00" EAST 40.00 FEET;
THENCE SOUTH 00°00'00" WEST 40.00 FEET;
THENCE SOUTH 90°00'00" WEST 40.00 FEET;
THENCE NORTH 00°00'00" EAST 40.00 FEET; TO THE **TRUE POINT OF BEGINNING**.

ACCESS AND UTILITY EASEMENT

THOSE STRIPS OF LAND LYING WITHIN THAT PORTION OF LOT 65 OF THE TOWNSITE OF HOLTVILLE, COUNTY OF IMPERIAL, STATE OF CALIFORNIA, ACCORDING TO MAP NO. 908, ON FILE IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

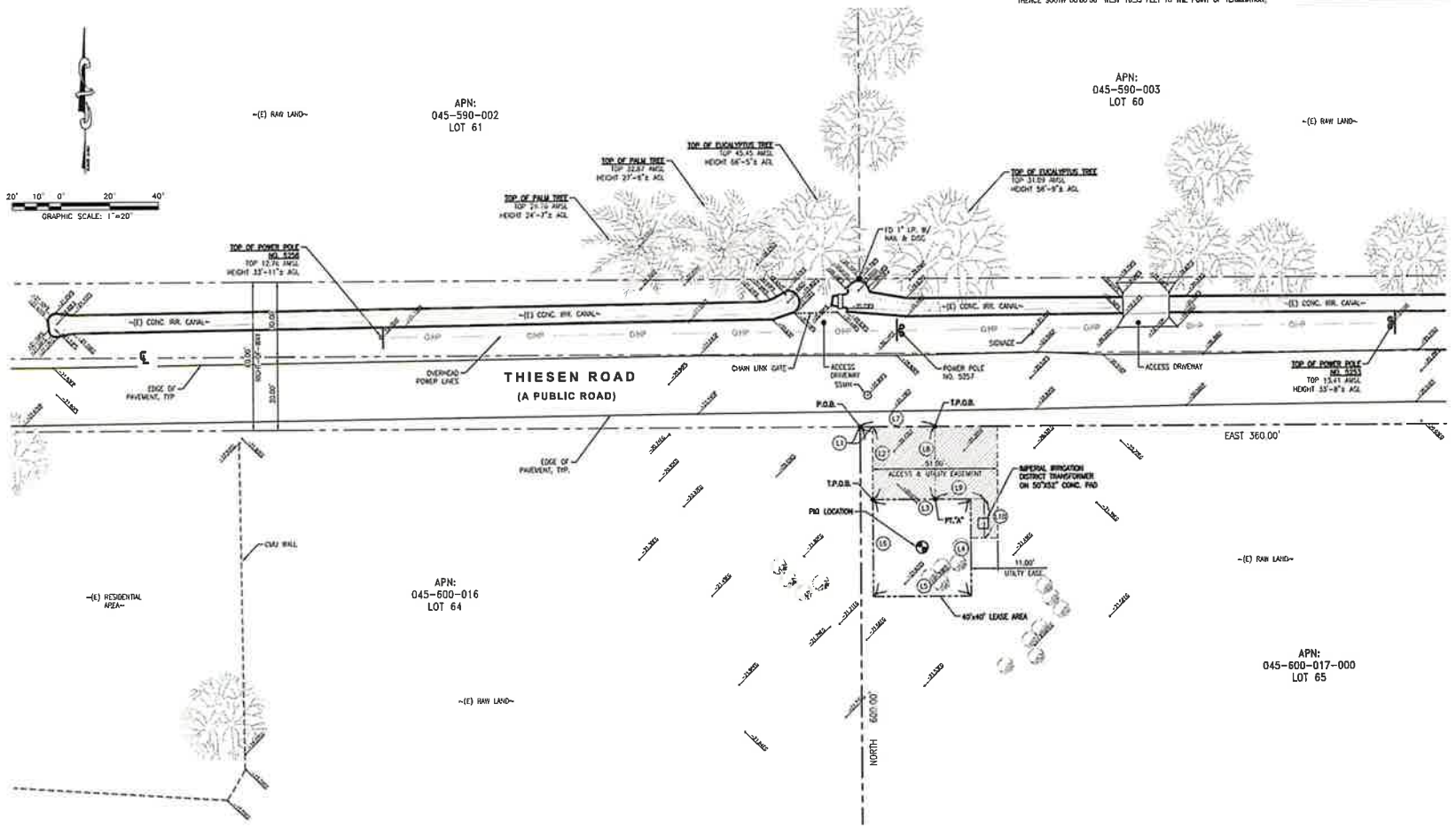
PARCEL 1
A STRIP OF LAND FIFTY-ONE (51) FEET WIDE, LYING 25.50 FEET ON EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE:

COMMENCING AT THE NORTHWEST CORNER OF SAID LOT 65,
THENCE NORTH 90°00'00" EAST 30.50 FEET TO THE **TRUE POINT OF BEGINNING**;
THENCE SOUTH 00°00'00" WEST 30.00 FEET A POINT HEREINAFTER REFERRED TO AS **POINT "A"**, ALSO BEING THE **POINT OF TERMINATION**.

PARCEL 2
A STRIP OF LAND ELEVEN (11) FEET WIDE, LYING 5.50 FEET ON EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE:

BEGINNING AT THE AFOREMENTIONED **POINT "A"**; THENCE NORTH 90°00'00" EAST 20.00 FEET TO THE **TRUE POINT OF BEGINNING**;
THENCE SOUTH 00°00'00" WEST 16.33 FEET TO THE **POINT OF TERMINATION**.

	LENGTH	BEARING
L1	5.00'	N 90°00'00" E
L2	30.00'	S 00°00'00" W
L3	40.00'	N 90°00'00" E
L4	40.00'	S 00°00'00" W
L5	40.00'	S 90°00'00" W
L6	40.00'	N 00°00'00" E
L7	30.50'	N 90°00'00" E
L8	30.00'	S 00°00'00" W
L9	20.00'	N 90°00'00" E
L10	16.33'	S 00°00'00" W



SURVEY PREPARED FOR:

verticalbridge

VB BTS II, LLC

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6357

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.216.2024

ENGINEER

AJK

34 RECCODO
IRVINE, CA 92618
714.624.9883

NO.			
2	FINAL SURVEY	LA	09/13/24
1	INCORPORATED TITLE REPORT	LA	08/29/24
0	PRELIMINARY SURVEY	LA	08/13/24
NO.	SUBMITTAL / REVISION	BY	DATE

DRAWN: LA
DESIGNED:
CHECKED: AJK

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
HOLTVILLE

1734 E. UNDERWOOD RD.,
HOLTVILLE, CA 92250-9642
IMPERIAL COUNTY

ENGINEER STAMP:

REGISTERED PROFESSIONAL ENGINEER — ANDREW J. KOLTAVARY — EXP. 03/31/26 — CIVIL — STATE OF CALIFORNIA

DRAWING TITLE:

TOPOGRAPHIC SURVEY

DRAWING SCALE:
AS NOTED

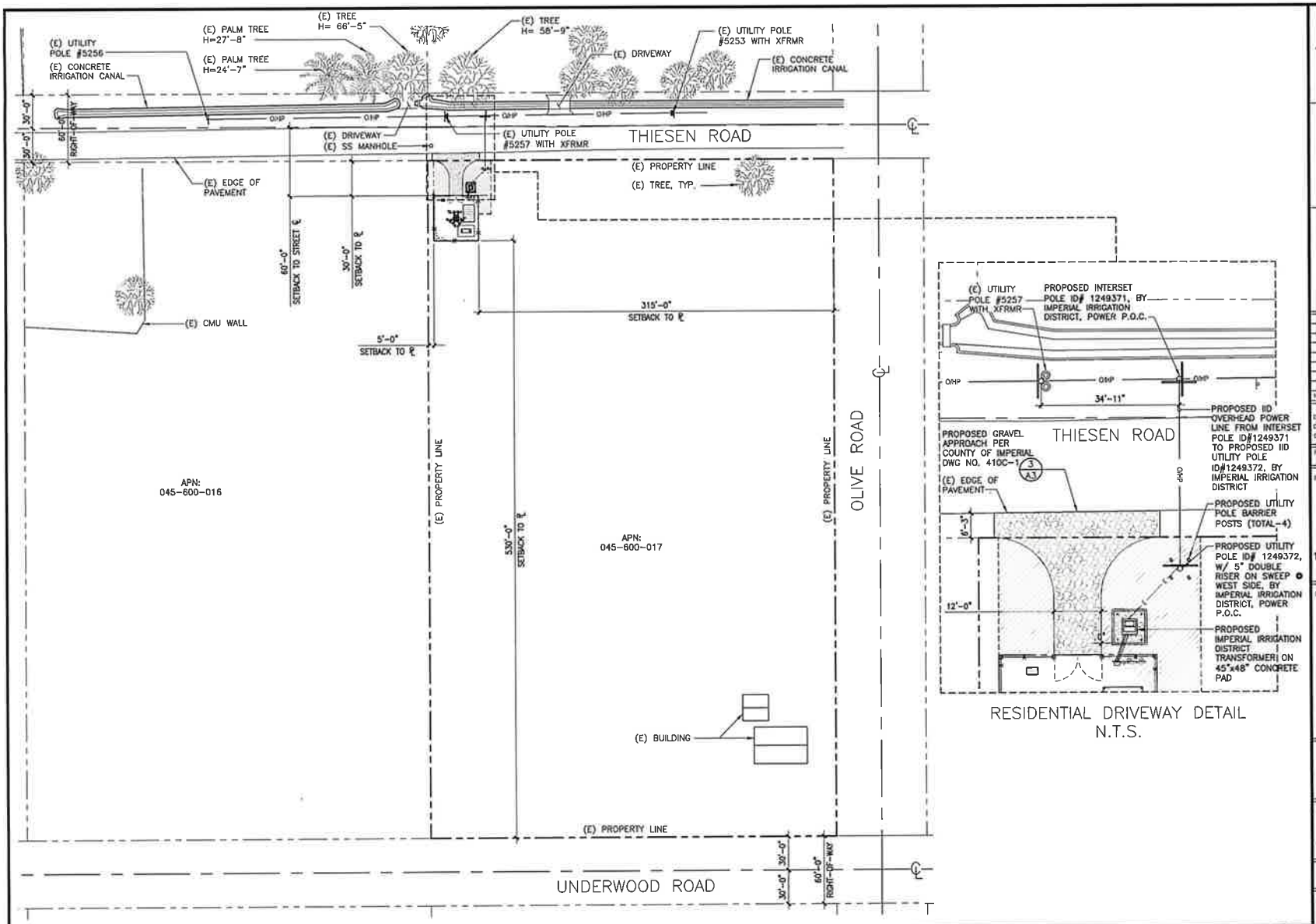
DATE:
08/21/2024

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DRAWING NUMBER:

LS-2

PC ORIGINAL PKG



RESIDENTIAL DRIVEWAY DETAIL
N.T.S.

SITE PLAN

11"x17" SCALE: 1" = 80'-0"
24"x36" SCALE: 1" = 40'-0"
0 20' 40' 80'

1

CLIENT

vertical bridge

22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
3	WPG COMMENTS	APP	09/19/25
2	WPG COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/19/25
B	ISSUED FOR ZONING	JR	07/30/24
A	ISSUED FOR REVIEW	CV	06/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE

SITE PLAN

DRAWING SCALE: AS NOTED

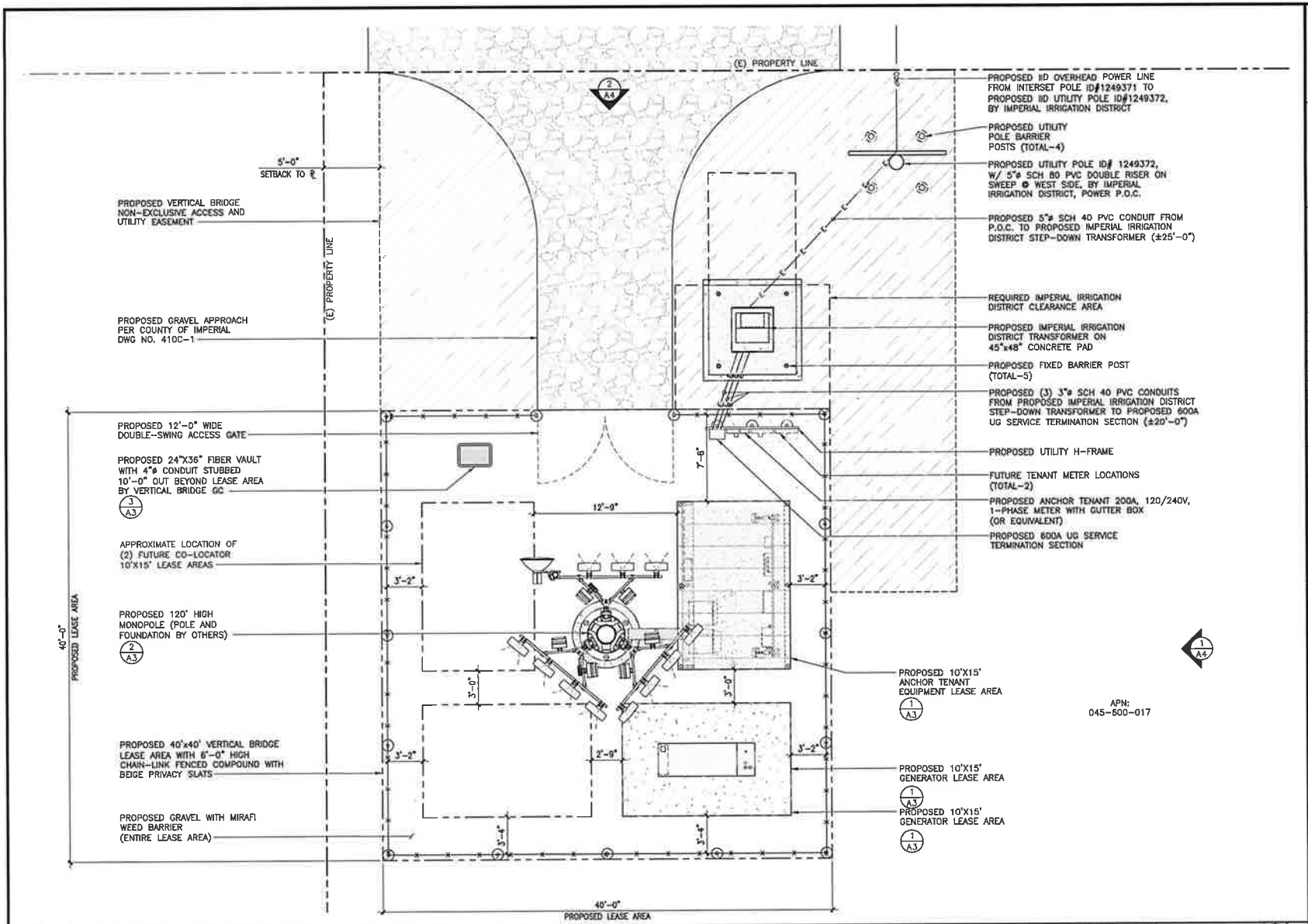
DATE: 09/04/25

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DRAWING NUMBER

A1



ENLARGED COMPOUND PLAN

11"x17" SCALE: 1" = 80'-0"
24"x36" SCALE: 1" = 30'-0"
0 15' 30' 60'

1

PC ORIGINAL PKG

CLIENT

verticalbridge

22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION

AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
3	WFG COMMENTS	APP	09/19/25
2	WFG COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/19/25
E	ISSUED FOR ZONING	JR	08/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE:
ENLARGED COMPOUND PLAN

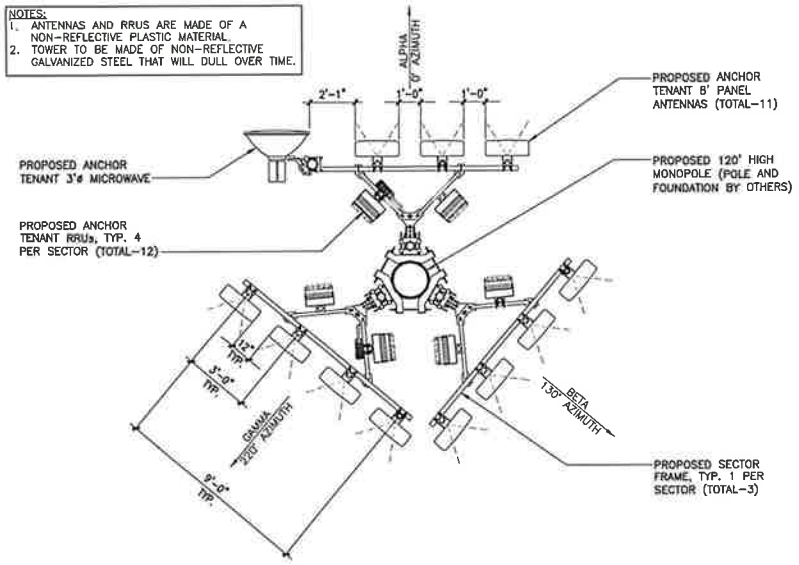
DRAWING SCALE: AS NOTED
DATE: 09/04/25
ZD

UNAUTHORIZED ALTERATION OR ADDITION TO THIS DOCUMENT IS A VIOLATION OF APPLICABLE STATE AND / OR LOCAL LAWS.

DRAWING NUMBER:
A2

PC ORIGINAL PKG

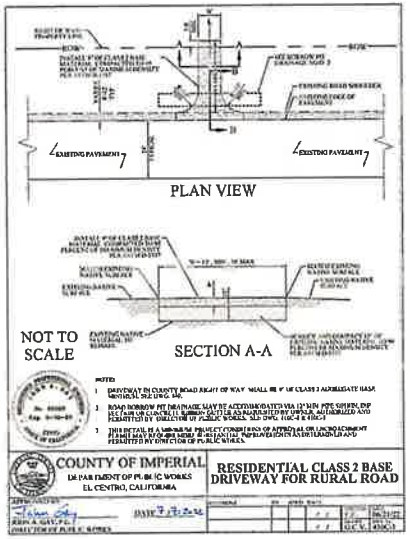
NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.



ANTENNA PLAN

11"x17" SCALE: 3/16" = 1'-0"
24"x36" SCALE: 3/8" = 1'-0"
0 1' 2' 4'

2



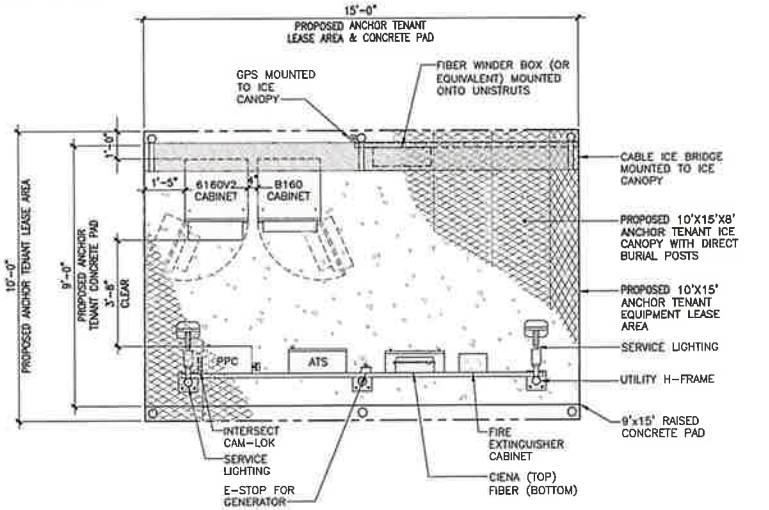
APPROACH DETAIL

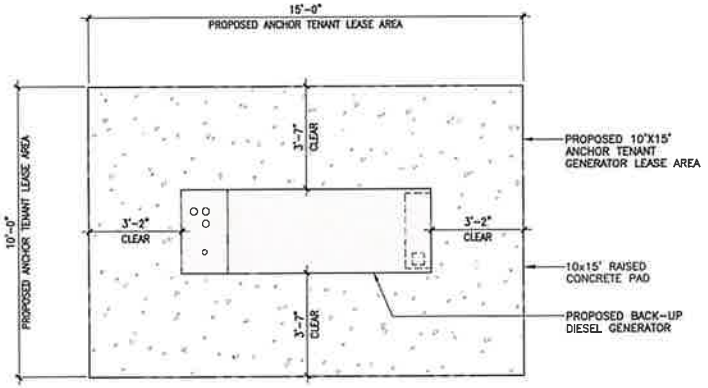
SCALE N.T.S.

3

SERVICE LIGHTING NOTES:
1. THE SERVICE LIGHT IS MANUALLY SWITCHED ON/OFF BY THE SITE TECHNICIAN IN EMERGENCY SITUATIONS.
2. MAINTENANCE OF THE CELL SITES ARE NORMALLY PERFORMED DURING DAY-LIGHT HOURS.
3. THE SERVICE LIGHT SHALL BE POINTED -45° TOWARDS THE GROUND.

SERVICE LIGHTING SPECIFICATIONS:
MODEL: PLTS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2097 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN

11"x17" SCALE: 1/4" = 1'-0"
24"x36" SCALE: 1/2" = 1'-0"
0 1' 2' 4'

1

CLIENT
verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
3	WPG COMMENTS	APP	09/19/25
2	WPG COMMENTS	JH	09/04/25
1	PLANNING COMMENTS	JH	08/15/25
E	ISSUED FOR ZONING	JH	08/30/24
A	ISSUED FOR REVIEW	CV	06/16/24

DRAWN: CV
DESIGNED CV
CHECKED APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD, UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE
EQUIPMENT AND ANTENNA PLAN

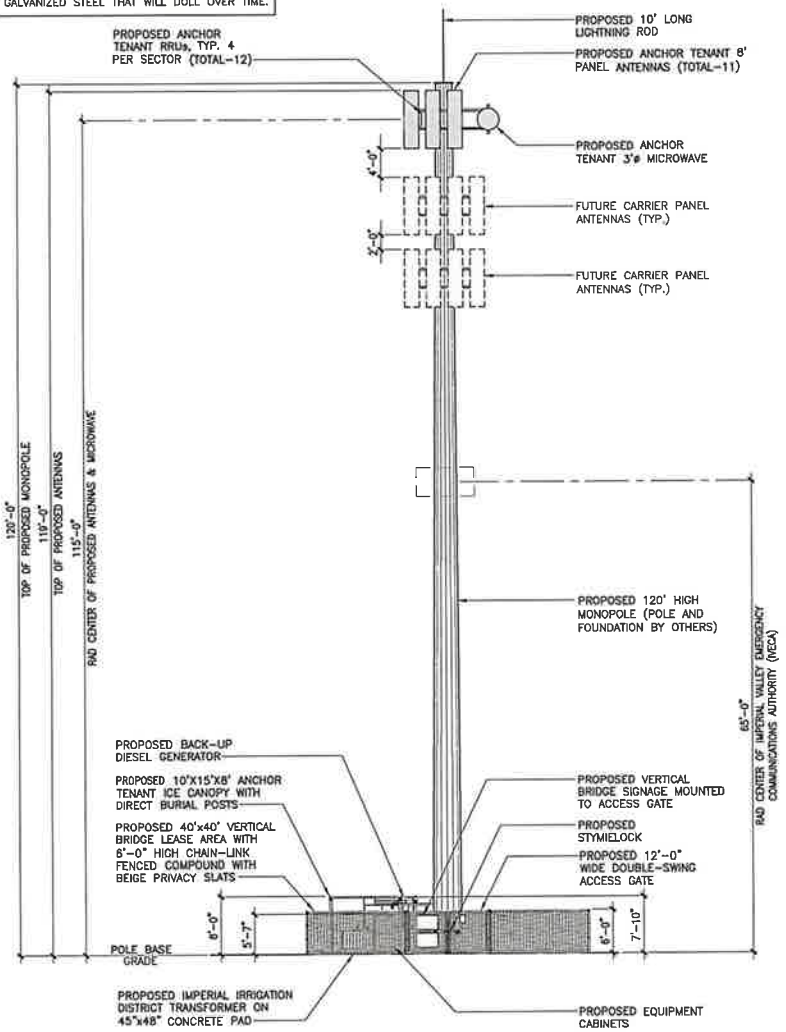
DRAWING SCALE: AS NOTED
DATE: 09/04/25
ZD

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DRAWING NUMBER:
A3

PC ORIGINAL PKG

NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.

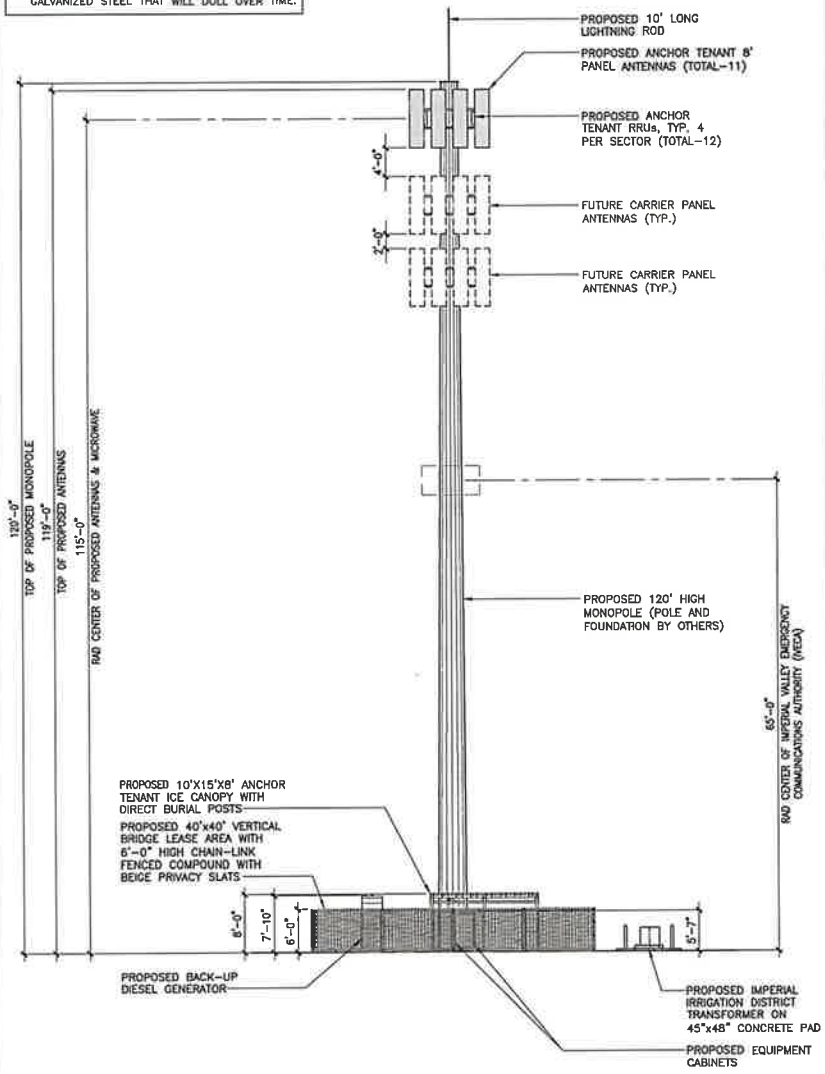


NORTH ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2' 4' 8'

2

NOTES:
1. ANTENNAS AND RRUS ARE MADE OF A NON-REFLECTIVE PLASTIC MATERIAL.
2. TOWER TO BE MADE OF NON-REFLECTIVE GALVANIZED STEEL THAT WILL DULL OVER TIME.



EAST ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2' 4' 8'

1

CLIENT
verticalbridge
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

SITE ACQUISITION
AD
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
3	WFD COMMENTS	APP	09/19/25
2	WFD COMMENTS	JR	09/04/25
1	PLANNING COMMENTS	JR	08/18/25
B	ISSUED FOR ZONING	JR	09/30/24
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD. UNIT 2
HOLTVILLE, CA 92250

ENGINEER STAMP

DRAWING TITLE:
ELEVATIONS

DRAWING SCALE: AS NOTED
DATE: 08/04/25
ZD

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DRAWING NUMBER:
A4

ASSURANCE
DEVELOPMENT

Attachment 9

Alternative Sites Analysis *(Revised)*

PC ORIGINAL PKG

Alternative Sites Analysis

Holtville, CA-5363

1734 E Underwood Rd.
Holtville, CA 92250

Prepared By:
Samantha Herrmann, Assurance Development
T-Mobile/VB BTS III, LLC
Updated: 9/18/2025

PC ORIGINAL PKG

Summary

In planning to meet its coverage objective, T-Mobile's Radio Frequency ("RF") engineers performed an RF engineering analysis, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the technical network objectives for the targeted service area. From this analysis, T-Mobile's RF engineers identified a 'search ring' area where a wireless facility may be located to provide effective service in the target coverage area. This facility is proposed to provide coverage to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks. In order to provide the coverage determined by T-Mobile RF Engineers, Applicants are requesting a variance for the total height of the tower at 130' for the reasons explained in Attachment 15, T-Mobile Coverage Objective & Engineering Justification.

There are numerous factors that must be considered when identifying an appropriate location for a new facility. These include T-Mobile's coverage objectives and the existing network infrastructure, adherence to local regulations, the presence of natural and man-made barriers, the availability of suitable sites with owners amenable to entering into an agreement, and the potential impact on aesthetics. Applicants assessed both the determined search area and the area surrounding Holtville to determine feasible candidates for the proposed facility. Twenty-four alterative candidates are presented in this document. Eventually, the analysis focused solely on the search area provided, and the proposed location at 1734 E Underwood Rd, Unit 2, Holtville, CA 92250 in Imperial County is the culmination of evaluating all critical factors and alternatives.

The Imperial County Code § 92401.06 requires that the alternative analysis shall include (1) co-location at all existing communication facilities whether in the unincorporated area of the county, a city or an adjacent county; (2) lower, more closely spaced communication facilities; and (3) mounting on any existing nonresidential structure within one-half mile of the proposed facility in the unincorporated area of Imperial County.

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Collocation on Existing Towers

Whenever possible, T-Mobile seeks to construct new sites on existing infrastructure before proceeding with the construction of a new free-standing facility. Before allocating a search area to an infrastructure provider like VB BTS III, LLC, T-Mobile conducts thorough research, ensuring all collocation opportunities are explored and exhausted. The search ring in this case does not contain any existing wireless towers. Therefore, Applicants then analyzes the existing towers within a three-mile radius of the proposed site. Please see Figure C of this document.

There are three existing towers within a two-mile radius of the proposed site. There is limited space available on these towers for co-location, and they do not offer the height required to meet T-Mobile's coverage objectives for the proposed facility. Applicants are limited in co-location opportunities as the proposed site is designed to supplement and provide continuous coverage throughout Holtville. Opportunities are limited due to the existing T-Mobile facility located at coordinates 32.8033, -115.3744. It was determined that collocating on an existing tower was not a feasible alternative, and further analysis is included in the table on page 7 of this document.

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Collocation on Existing Non-Tower Structures @ 119' antenna tip height AGL

There are no structures within the search area that can support the required height of 119' to meet the coverage objectives for this tower. The buildings in this area are residential structures at heights ranging from 20'-35'.

These structures cannot support a tower at the required height while meeting the requirements set forth in Code Section 92401.04(5)(d): "No roof-mounted wireless communication facility, except an exempt facility, may be more than twelve (12) feet taller than the roof of the building on which it is mounted, unless facility is fully screened and height does not exceed height permitted by applicable zoning code." Therefore, Applicants have proposed to locate a freestanding monopole tower at 1734 E Underwood Rd.

PC ORIGINAL PKG

Figure A: T-Mobile Alternative Candidates Map

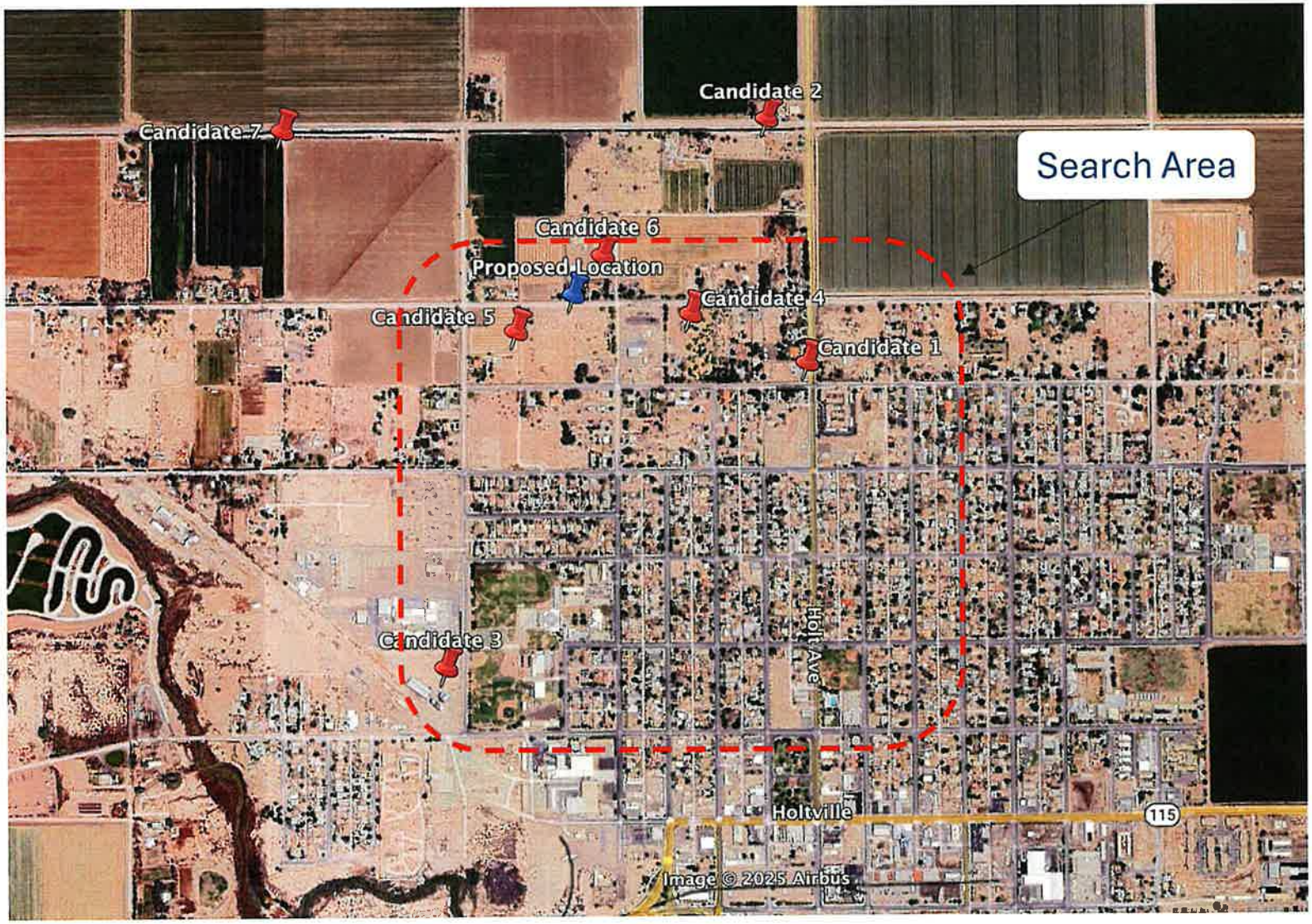
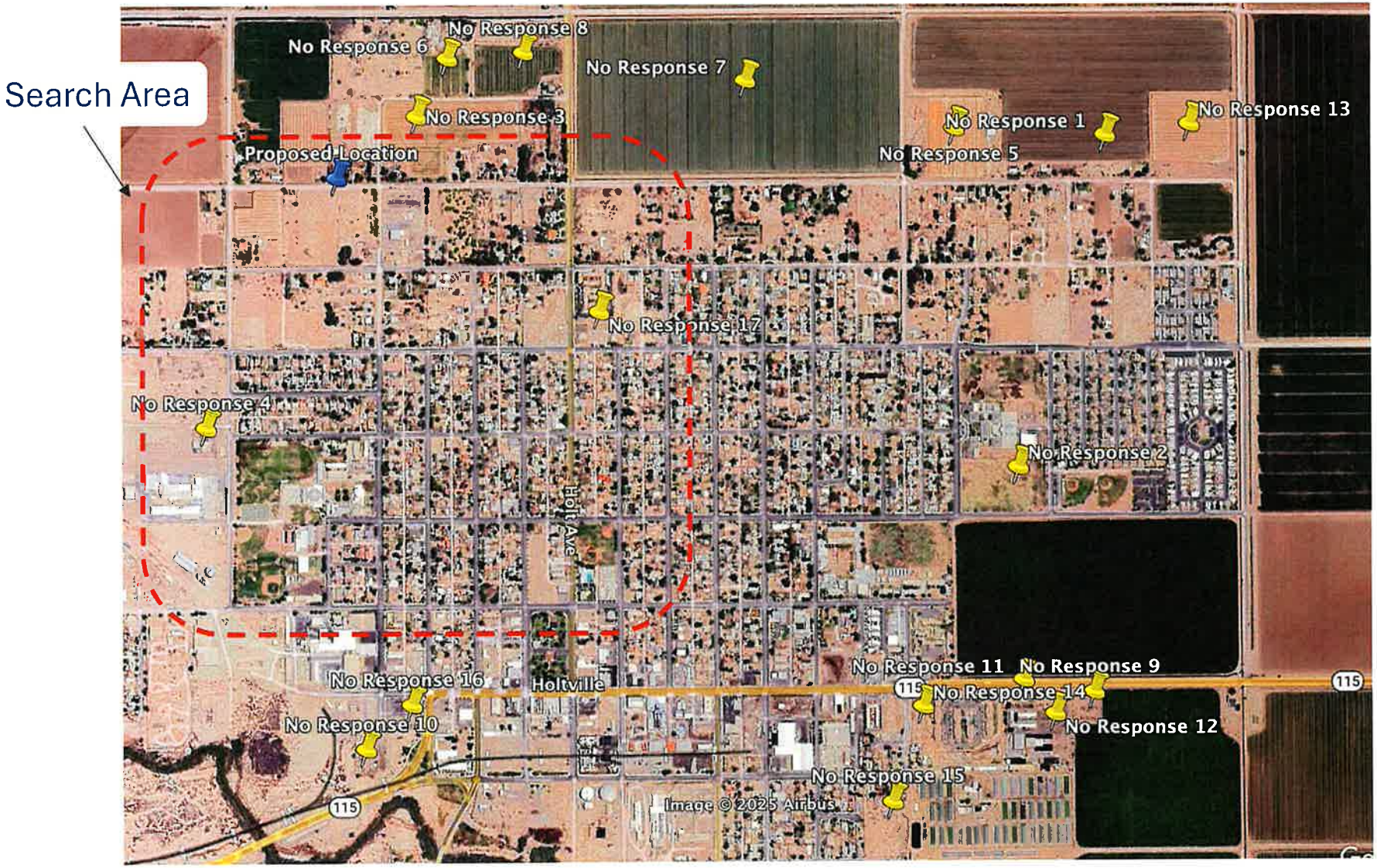


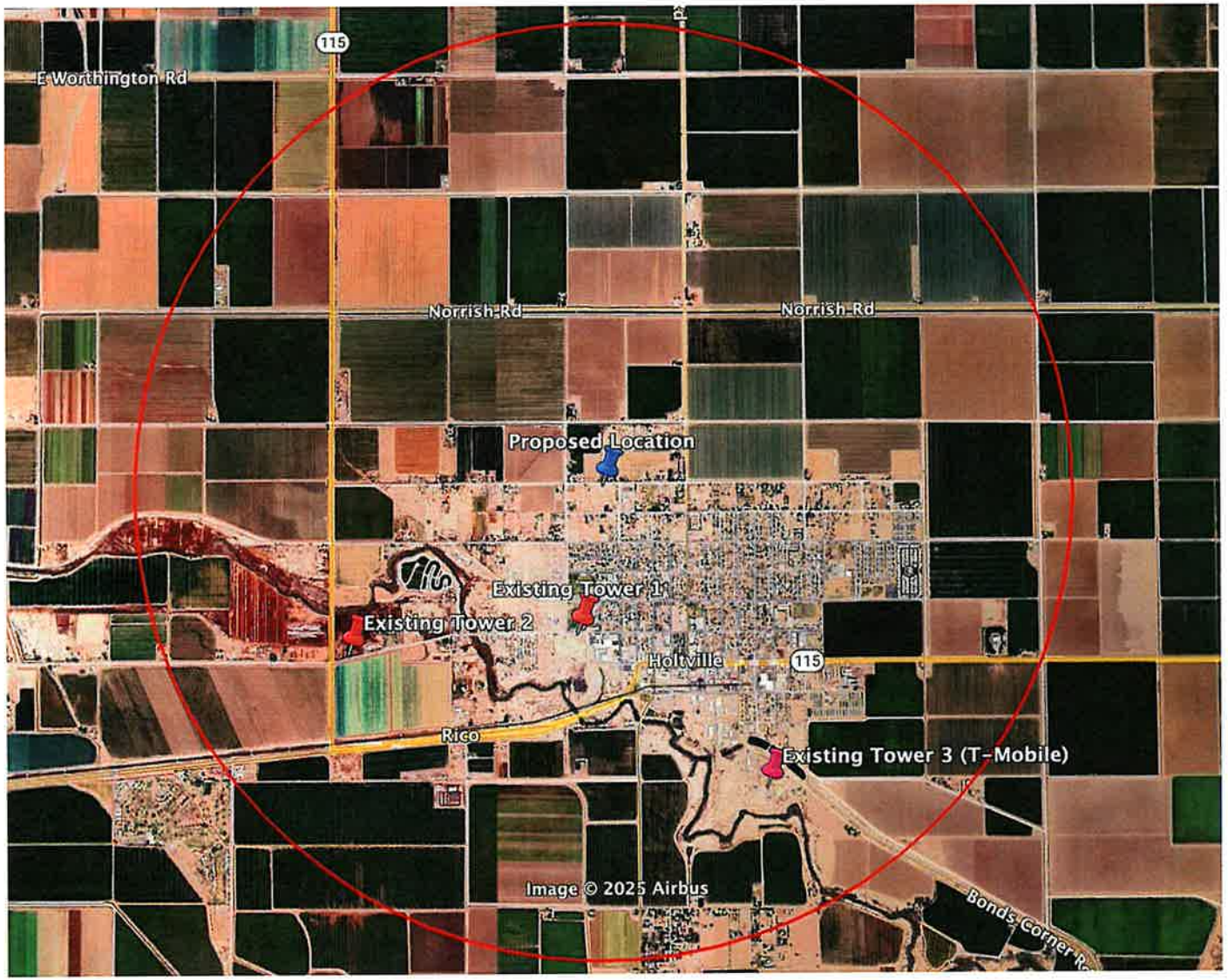
Figure B: Additional Property Owners Contacted (No Response)



PC ORIGINAL PKG

PC ORIGINAL PKG

Figure C: Existing Towers within Two Miles of Proposed Facility



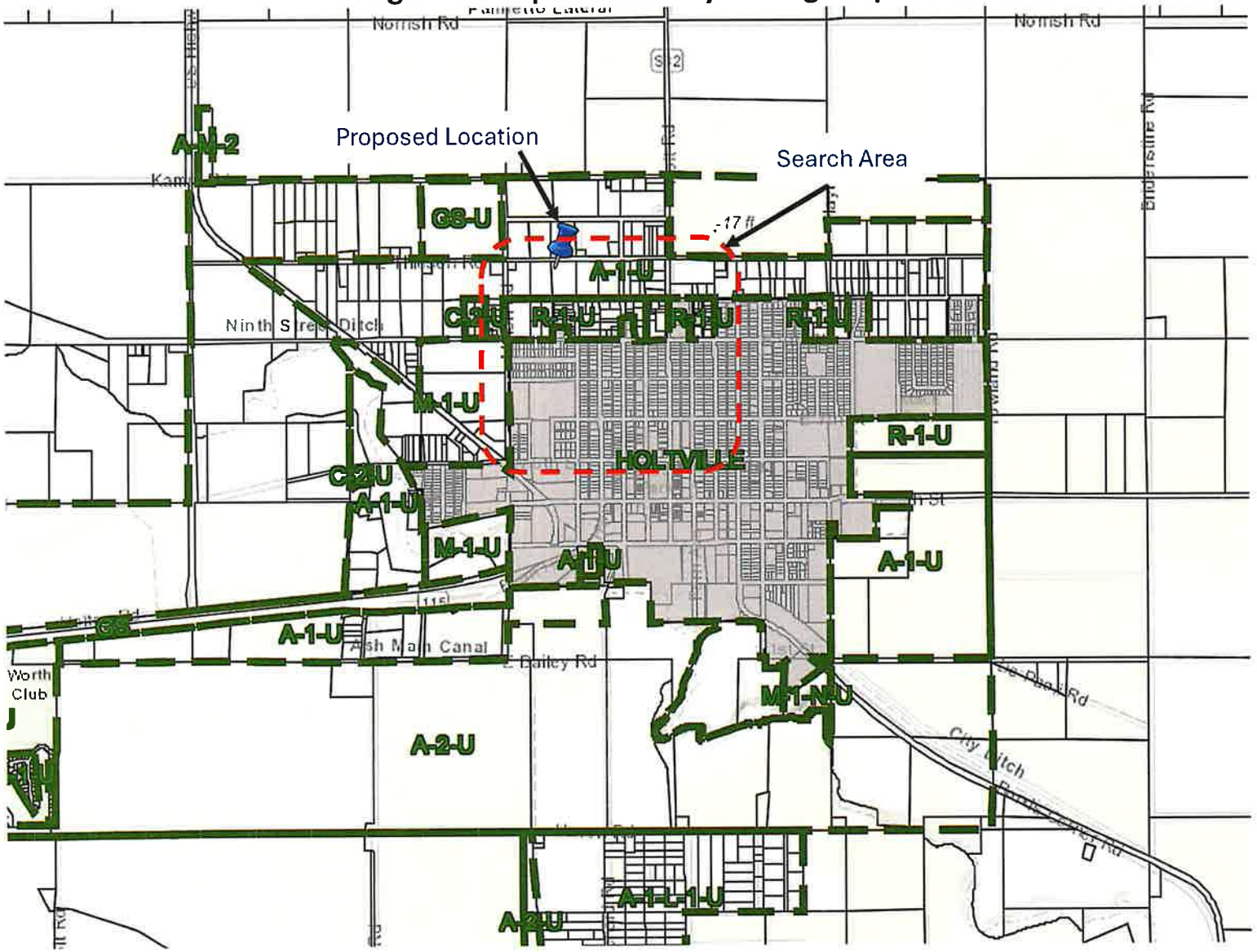
Alternative Analysis Summary – Towers within Two Miles of Proposed Facility

	Location	Distance to Proposed Facility	Feasible? (Y/N)	Summary
Collocation on Existing Towers				
1	32.8127, -115.3882	Approx. 0.6 Miles	N	This approx. 80' Microwave tower is owned by the Imperial Irrigation District, Telecommunications Section. The height of the tower would not adequately serve the coverage objectives and could not structurally support the equipment needed for the proposed facility.
2	32.81150833, -115.404900	Approx. 1.3 Miles	N	This approx. 160' lattice tower is located outside of the desired coverage area and the location of T-Mobile's equipment on this tower would not provide sufficient coverage to Holtville. Additionally, the proposed tower aims to provide improved and continuous coverage throughout Holtville by supplementing the existing T-Mobile facility to the south and this tower would not provide meet the coverage objectives to the north.
3	32.8033, -115.3744	Approx. 1.4 Miles	N	This approx. 100' lattice tower supports existing T-Mobile equipment. As the proposed site location is intended to provide improved and continuous coverage throughout Holtville, this tower would not be a feasible opportunity for co-location.

PC ORIGINAL PKG

PC ORIGINAL PKG

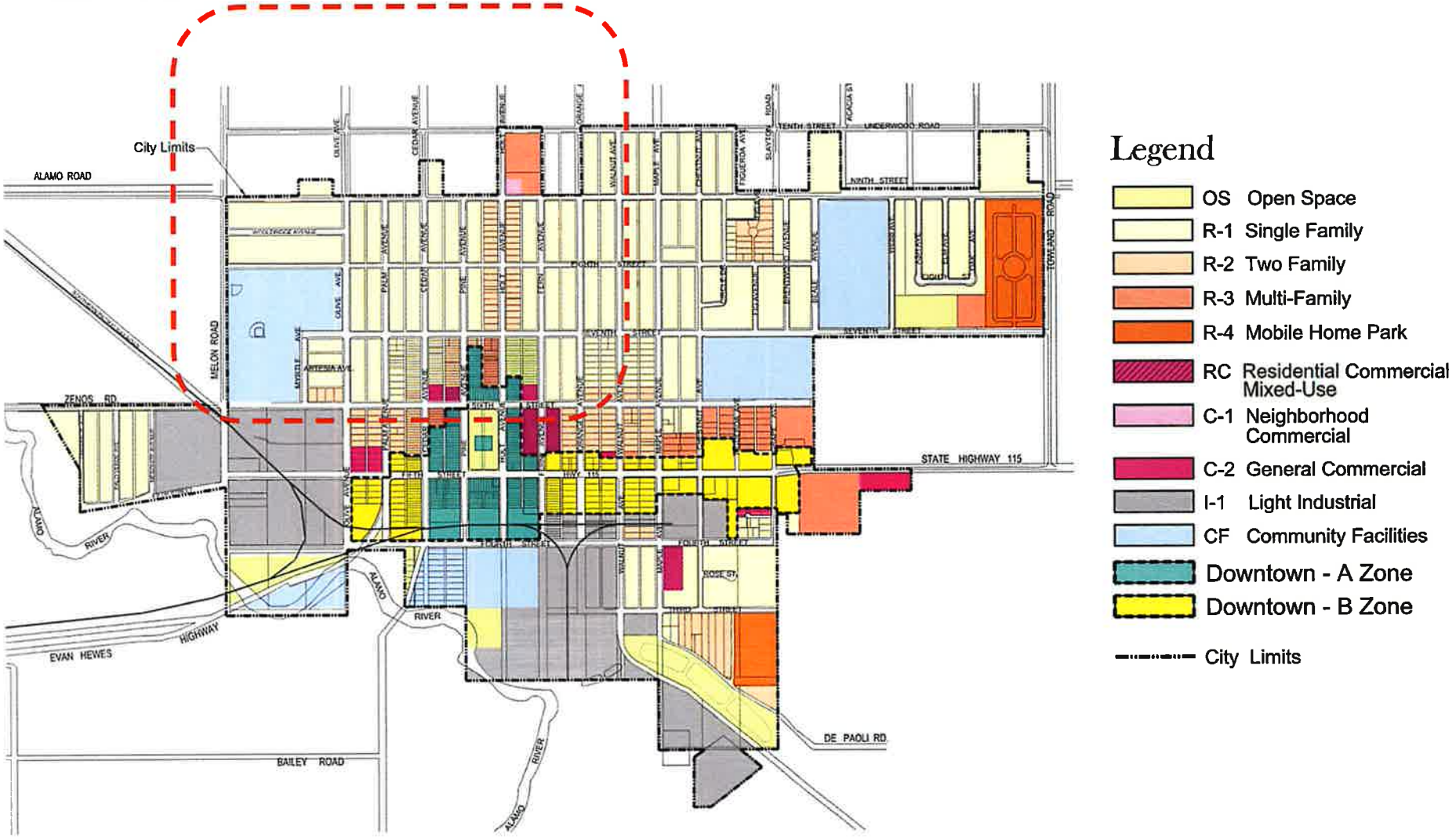
Figure D: Imperial County Zoning Map



PC ORIGINAL PKG

Figure E: City of Holtville Zoning Map

The City of Holtville discourages communications facilities within residential zones. The majority of the designated search area is comprised of R-1, R-2, and CF. The maximum height limit in these zones is 35' without a variance.



Alternative Analysis Summary – T-Mobile Alternative Candidates

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
	APN: 045-600-017 Address: 1734 E Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	The Proposed Location was selected as the best and least intrusive option for the proposed WCF because there were no feasible collocation opportunities, and there were no feasible zoned parcels as demonstrated herein. As Planning determined, wireless communications facilities are permitted within the A-1 zone.
New Tower Location Alternatives					
1	APN: 045-600-015 Address: 2331 Holt Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process due to development of a residence on the property and the Applicants could not move forward with locating a tower on this property.
2	APN: 045-580-012 Address: 2392 Holt Rd.	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
3	APN: 045-570-063 Address: N/A	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and

PC ORIGINAL PKG

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
Selected Site Location					
					the Applicants could not move forward with locating a tower on this property.
4	APN: 045-600-004 Address: 1752 Underwood Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
5	APN: 045-600-019 Address: 2326 Melon Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
6	APN: 045-590-003 Address: 1736 Thiesen Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.
7	APN: 045-080-085 Address: 1642 E Thiesen Ave	Zoning: A-2 Land Use: Urban Jurisdiction: County	Y	N	This parcel was considered as a possible option that would meet the project's coverage needs. The property owner expressed interest in leasing space for the proposed wireless facility, however, negotiations fell out during the leasing process and the Applicants could not move forward with locating a tower on this property.

PC ORIGINAL PKG

Alternative Analysis Summary – Additional Property Owners Contacted (No Response)

	Location	Zoning & Land Use	Contacted? (Y/N)	Feasible? (Y/N)	Summary
1	APN: 050-200-005 1966 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
2	APN: 045-621-001 800 BEALE	Zoning: CF Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
3	APN: 045-590-005	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
4	APN: 045-570-088 2255 MELON Rd	Zoning: M-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
5	APN: 050-200-004 1904 E THIESEN	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
6	APN: 045-580-007 1749 E KAMM Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
7	APN: 045-040-036	Zoning: A-1 / A-2 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
8	APN: 045-580-009 2377 HOLT Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
9	APN: 045-610-009 1995 E HWY 80 Dr	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
10	APN: 045-242-008 405 OLIVE Rd	Zoning: I-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

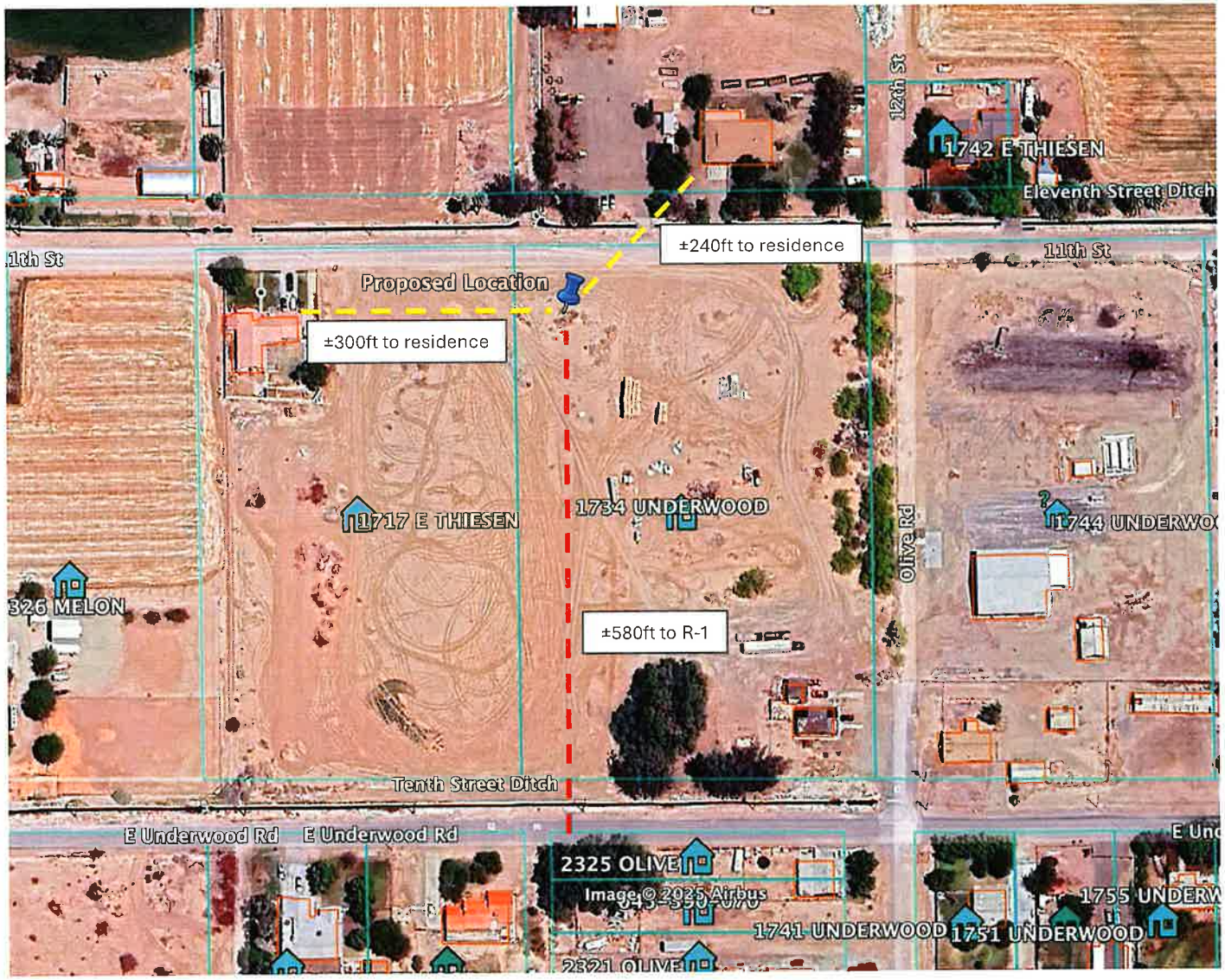
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11	APN: 045-610-005 1090 E FIFTH	Zoning: C-2 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
12	APN: 045-610-006	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
13	APN: 050-200-002 1990 E THIESEN Rd	Zoning: A-1 Land Use: Urban Jurisdiction: County	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
14	APN: 045-610-025 820 E 5TH St	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
15	APN: 045-634-013 710 EA 4TH St	Zoning: R-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
16	APN: 045-281-008	Zoning: Downtown - B Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.
17	APN: 045-440-064	Zoning: R-3 / C-1 Jurisdiction: City of Holtville	Y	Y	A letter of interest was sent to the property owner, but no response was received. Applicants could not move forward with this location.

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Figure F: Setback from Residences and Residential Zone (R-1)



ASSURANCE DEVELOPMENT

Attachment 13

Photo Simulations *(Revised)*

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AERIAL MAP



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PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK
CONTACT : JOYCE YU
EMAIL : SIMS@DRAFTLINK.COM
PHONE : 949-232-5045
WWW.DRAFTLINK.COM

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NO.	DATE	REVISIONS	BY
0	1/06/2025	ISSUED FOR SUBMITTAL	JFY
1	8/28/2025	VIEW A REVISED	JFY
2	9/15/2025	INSTALL SLATS	JFY

verticalbridge

US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
A	1 / 4

AERIAL MAP



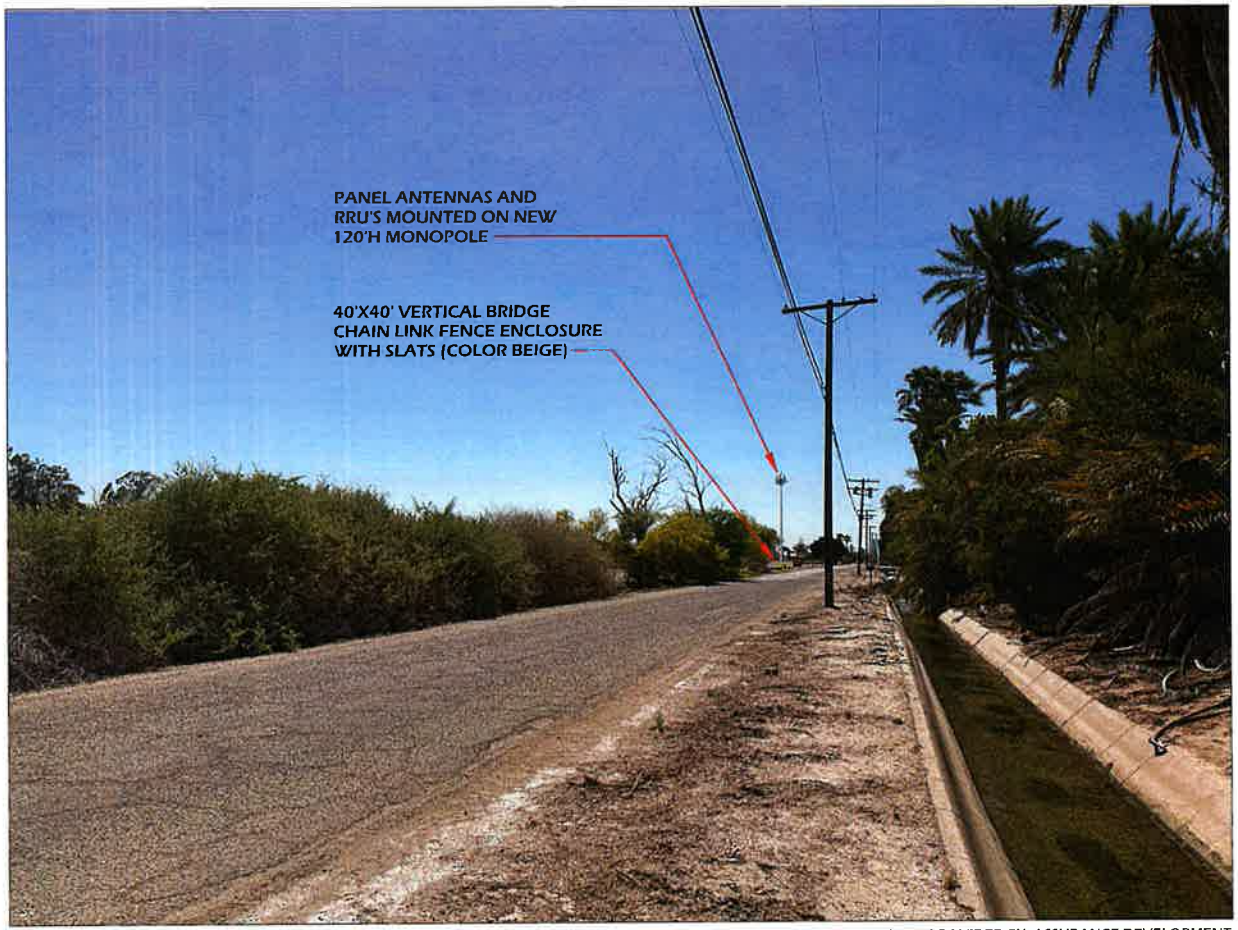
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NO.	DATE	REVISIONS	BY
0	1/06/2025	ISSUED FOR SUBMITTAL	JFY
1	8/28/2025	VIEW A REVISED	JFY
2	9/15/2025	INSTALL SLATS	JFY

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US-CA-5363
HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
B	2 / 4

AERIAL MAP



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0	1/06/2025	ISSUED FOR SUBMITTAL	JFY
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VIEW	SHEET
C	3 / 4

AERIAL MAP



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ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	1/06/2025	ISSUED FOR SUBMITTAL	JFY
1	8/28/2025	VIEW A REVISED	JFY
2	9/15/2025	INSTALL SLATS	JFY

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HOLTVILLE
1734 E UNDERWOOD ROAD
HOLTVILLE, CA 92250

VIEW	SHEET
D	4 / 4

ASSURANCE DEVELOPMENT

Attachment 15

T-Mobile Coverage Objective and Engineering Justification *(Revised)*

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COVERAGE OBJECTIVE & ENGINEERING JUSTIFICATION

Holtville-SD07772C

09/16/2025

Prepared by: Toan Vu

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T-Mobile Confidential

COVERAGE JUSTIFICATION

OVERVIEW

Vertical Bridge is proposing to build a new structure for the future collocation of multiple carriers at 1734 East Underwood Rd, Holtville, in unincorporated Imperial County. T-Mobile is proposing to collocate its equipment at the 119 ft (antenna tip height) elevation on the new stealth structure.

This proposed facility meets T-Mobile's coverage and capacity objectives by providing reliable 5G and 4G wireless coverage within an area northeast of Holtville and the surrounding area, not adequately served by T-Mobile's network.

Specifically, this proposed new wireless facility is intended to improve both voice & data services to the Holtville community, Norrish Rd, Holtville High School, Underwood Rd and surrounding residential & commercial areas and parks.

This coverage and capacity objectives were determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This facility will allow T-Mobile to provide more reliable wireless service with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area.

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COVERAGE JUSTIFICATION (CONT.)

FEDERAL LAW The Telecommunications Act of 1996 prohibits a local jurisdiction from taking any action on a wireless siting permit that "prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B)(i)(II).

- According to the Federal Communications Commission ("FCC") Order adopted in September 2018, a local jurisdiction's action has the effect of prohibiting the provision of wireless services when it "materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment." Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.
    - *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part, City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) ("FCC Order").
- A local government's denial of an application to install a personal wireless service facility has the effect of prohibiting the provision of personal wireless service if materially inhibits or limits T-Mobile's ability to deploy the facilities, technologies, or services that conform to T-Mobile's network standards and objectives.

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COVERAGE JUSTIFICATION (CONT.)

FEDERAL LAW (CONT.) While T-Mobile is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap**. Reliable in-building coverage is now a necessity and every community's expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a "significant gap" can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City,* 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007*), affirmed in part,* 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco,* 2006 WL 1699580, *10-11 (N.D. Cal. 2006).
- **Least Intrusive Means.** The least intrusive means standard "requires that the provider 'show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.'" 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code's preferences and siting requirements.

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COVERAGE JUSTIFICATION (CONT.)

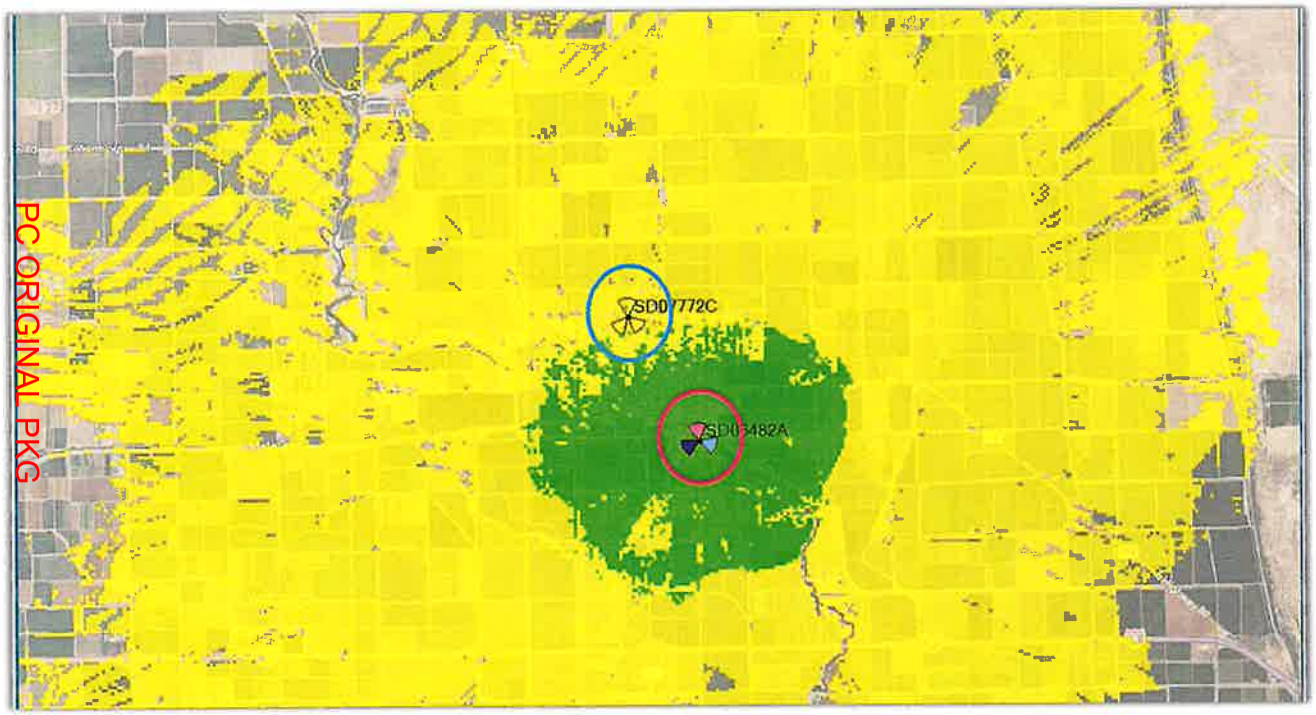
COVERAGE OBJECTIVE

- **Figure A —Existing T-Mobile Coverage.** Shows existing T-Mobile wireless services in the general area of the proposed new site, which demonstrates the current deficiency in coverage in the targeted service area. The blue circle indicates the location of the proposed new WCF, the magenta circle indicates the location of existing T-Mobile WCF sites; coverage from T-Mobile existing WCF sites is shaded in green. As can be seen, there is a coverage deficiency in all areas not shaded in green. Currently, the target coverage area has minimal to no 5G/4G reliable service.
- **Figure B—Projected New T-Mobile Coverage at 119 ft. (Requested Height).** Identifies the projected coverage from the proposed new WCF with the requested antenna tip height of 119 ft. The proposed antenna tip height is the minimum necessary to help fill the coverage objective relative to nearby complementary wireless facilities & to serve the max possible population. This is also the height where a T-Mobile wireless device can be reliably used to make and receive telephone calls and use data service in the presence of varying signals.
- **Figure C—Comparison of Projected T-Mobile Coverage at 119 ft. (Requested Height) vs. 60 ft (Base Zone Height).** Shows a comparison of the projected coverage from the proposed new WCF if limited to the maximum height permitted in the A-1 zone without a height variance. A facility limited to the base zone height of 60 ft. would result in a [44.7%] reduction in square miles receiving reliable coverage (4.7 miles at 119 ft vs 2.6 miles at 60 ft), and [81.4%] reduction in the new population receiving reliable coverage (5,720 residents at 119 ft vs. 1,062 residents at 60 ft.). T-Mobile has determined that a 119' antenna tip height is the minimum height necessary at this location for the effective operation of its wireless network and to meet its service objectives.

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FIGURE A – EXISTING SERVICE WITHOUT THE PROPOSED SITE



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MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

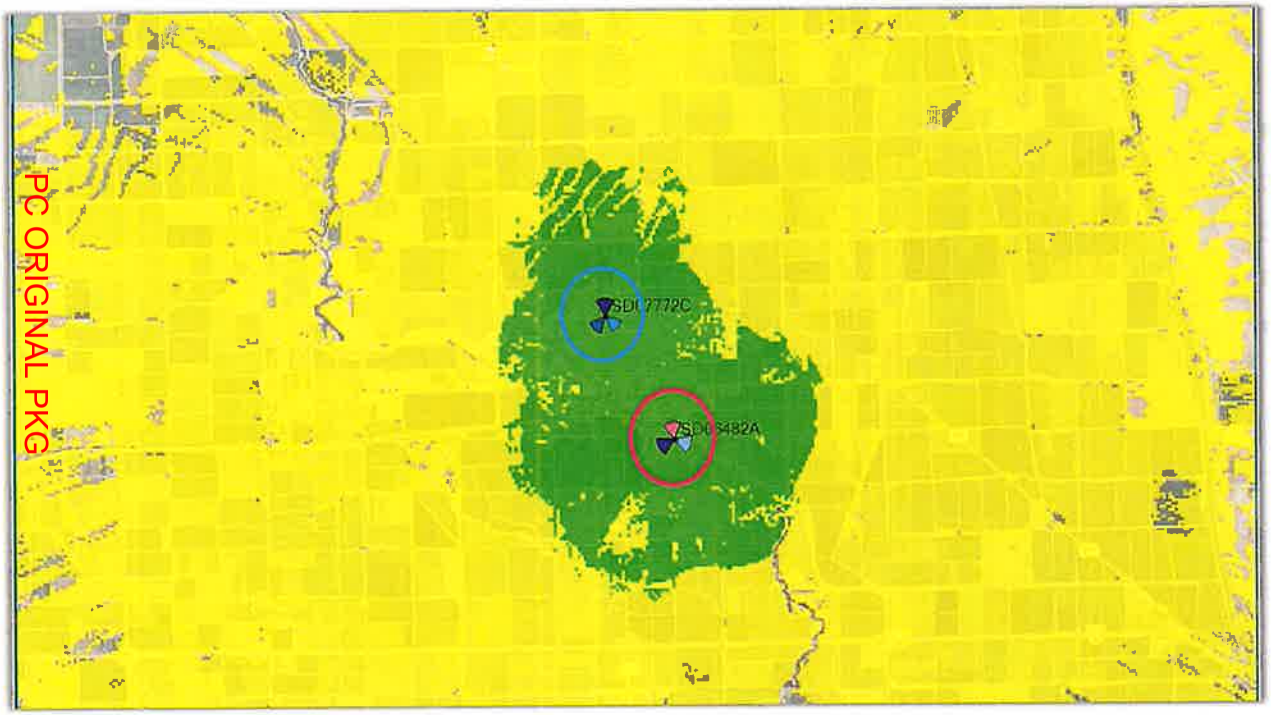
	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

Legend

- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

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FIGURE B – PROJECTED SERVICE WITH THE PROPOSED SITE @ 119' TIP HEIGHT AGL



MID BAND (AWS-2100 MHZ) LTE SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

Legend

- Proposed new WCF SD07726C
- Existing T-Mobile site SD06482A

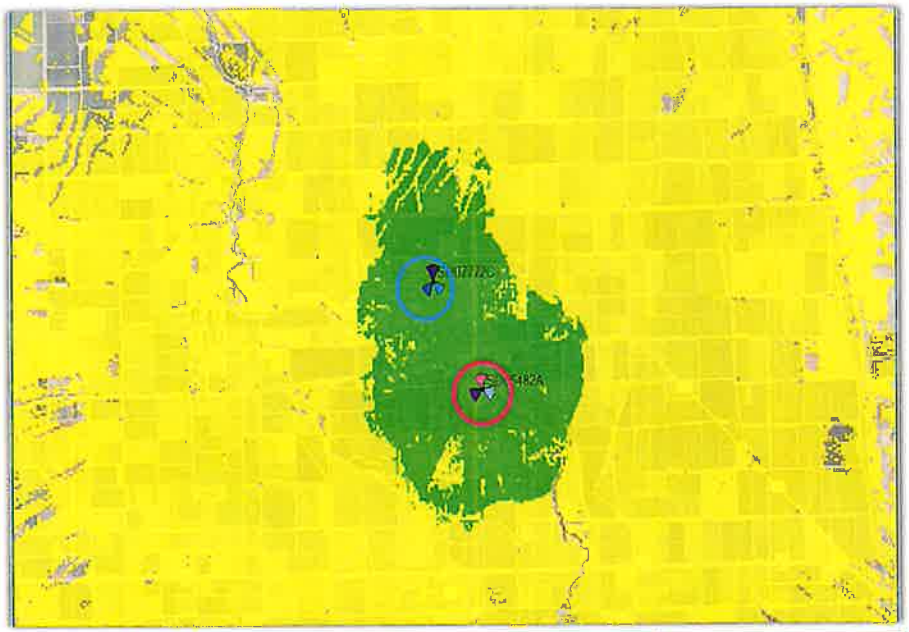
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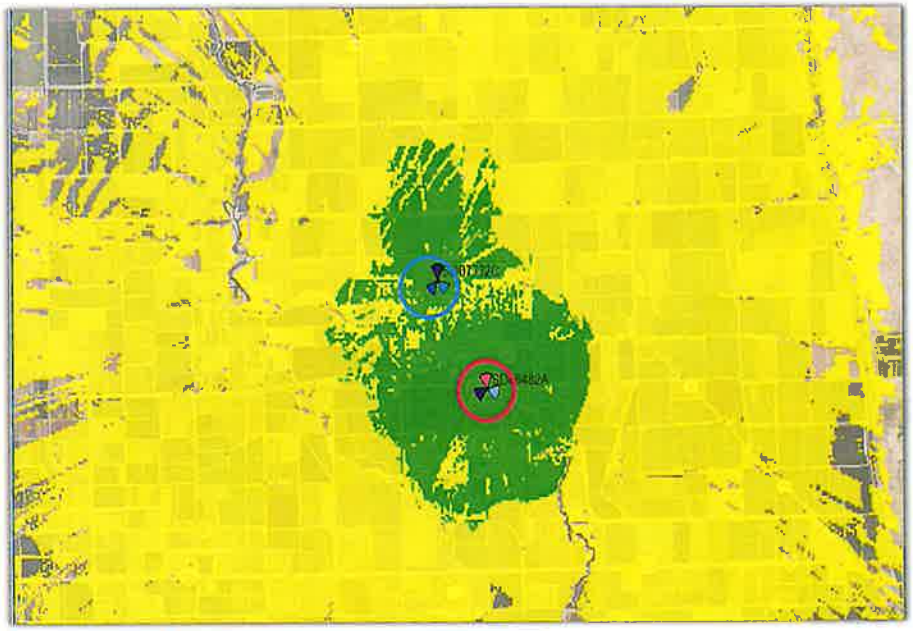
FIGURE C – COMPARISON OF COVERAGE FROM PROPOSED SITE: 119’ VS 60’ TIP HEIGHT AGL

MID BAND (AWS-2100 MHZ) SERVICE MAP (RSRP)

	Reliable Coverage: -100dBm < RSRP
	Marginal Coverage : -115dBm < RSRP < -100dBm

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Legend	POPs-Reliable Coverage	Net Change
Existing +New 119' Tower	9,964	5720 Residents
Existing +New 60' Tower	5,306	1062 Residents
% Change		-4658 Residents (-81.4%)

Tower Height	Reliable Coverage-Square miles
119' Tower	4.7
60' Tower	2.6
% Change	-44.68%

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ALTERNATIVE SITE ANALYSIS

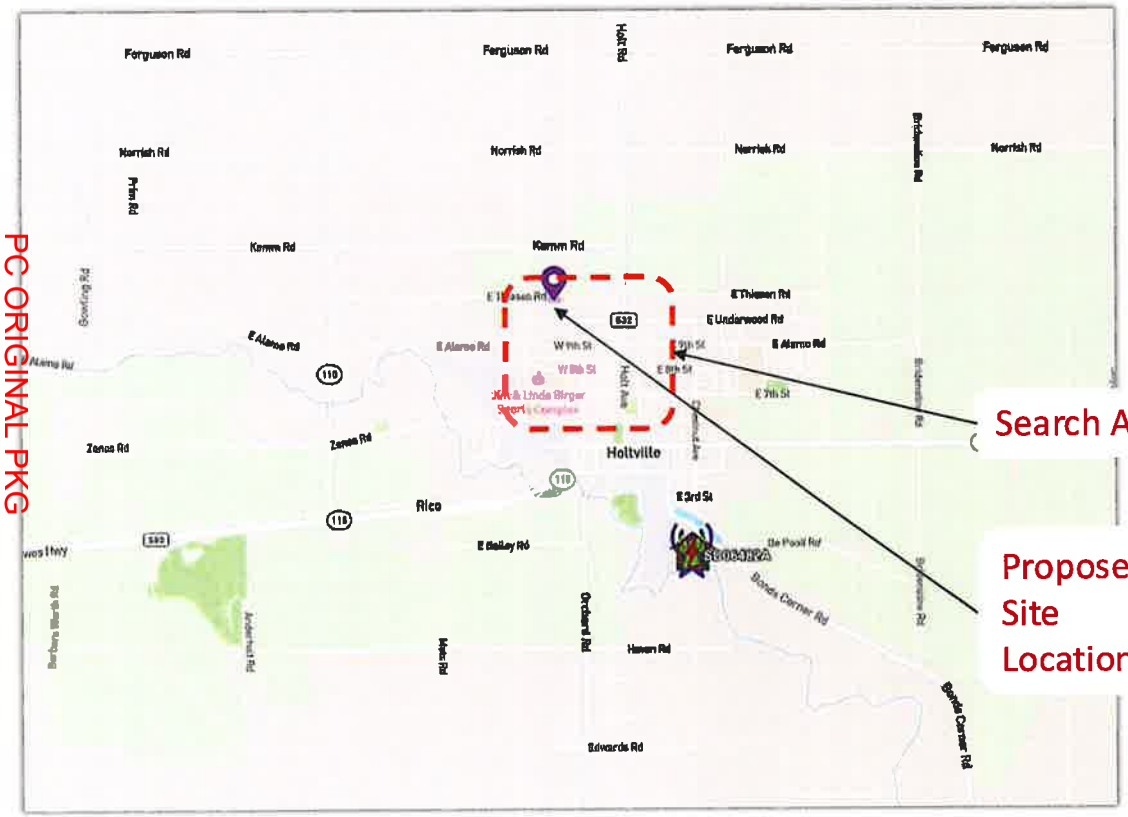
SEARCH RING

- T-Mobile's radio frequency ("RF") engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, T-Mobile's RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.
- **Figure D —Targeted Search Ring** indicates the search ring T-Mobile's RF engineers established for this proposed site. A discussion of the methodology T-Mobile's RF engineers used to identify the search ring is included at the end of this RF Justification document.

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FIGURE D – TARGETED SEARCH RING

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- Search Ring is to cover the main population areas in city of Holtville
- TMO has only 1 existing site to the south that is not able to cover the needed areas

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COVERAGE METHODOLOGY

T-Mobile's RF engineers use the following signal strength standards to demonstrate the quality of coverage depicted on the maps herein.

- **Reliable Coverage.** Green represents minimum signal strength of -100dBm, T-Mobile's design criteria for reliable 4G in-building residential voice coverage at 2100 MHz. This signal strength is required for customers to take advantage of T-Mobile's Home Internet services.
- **Marginal Coverage.** Yellow represents minimum signal strength of -115dBm, but less than -100dBm, T-Mobile's design criteria for in-vehicle coverage at 2100 MHz.
- **No Coverage.** Signal strength less than -115dBm is not shown, as it does not meet T-Mobile's design standards for reliable in-building or in-vehicle coverage.
- **T-Mobile's 4G & 5G Online Coverage Map.** The online coverage map approximates anticipated **outdoor coverage** (including 600Mhz 4G LTE) based on a variety of factors, which may include limited or no coverage areas, and does not guarantee service availability; some data-intensive uses may have decreased functionality in low-bandwidth areas, especially indoors or on the exterior edges of the approximated coverage area. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability. Some coverage (e.g., Narrowband IoT, millimeter wave 5G) not depicted.

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SEARCH RING METHODOLOGY

T-Mobile's RF engineers used coverage propagation software systems to predict the coverage provided by the proposed new WCF. The software and T-Mobile's RF engineers considered the general factors outlined below, as well as more project-specific factors such as the type of antenna, antenna tilt, etc. Within coverage areas, network changes, traffic volume, outages, technical limitations, signal strength, customer equipment, obstructions, weather and other conditions may interfere with service quality and availability.

- **Coverage.** The antenna site must be located in an area where the radio frequency broadcasts will provide adequate coverage within the targeted service area. The RF engineer must take into consideration the coverage objectives for the site as well as the terrain in and around the area to be covered. Because radio frequency broadcasts travel in a straight line and diminish as they travel further away from the antennas, it is generally best to place an antenna site near the center of the desired coverage area. However, in certain cases, the search ring may be located away from the center of the desired coverage area due to the existing coverage, the surrounding terrain, or other features that might affect the radio frequency broadcasts, *e.g.,* buildings or sources of electrical interference.
- **Clutter.** T-Mobile's WCFs must "clear the clutter"—the WCF site must be installed above or close to RF obstructions (the "clutter") to enable the RF signals to extend beyond and clear the clutter. T-Mobile radio frequencies do not penetrate mountains, hills, rocks, or metal, and are diminished by trees, brick and wood walls, and other structures. Accordingly, T-Mobile's antennas must be installed above or close to the "clutter" to provide high quality communications services in the desired coverage areas. Additionally, if the local code requires us to accommodate additional carriers on the support structure, the structure must be even taller to also allow the other carriers' antennas to clear the clutter.
- **Call Handoff.** The WCF site must be in an area where the radio broadcasts from the site will allow seamless "call handoff" with adjacent WCF sites. Call handoff is a feature of a wireless communications system that allows an ongoing telephone conversation to continue uninterrupted as the user travels from the coverage area of one antenna site into the coverage area of an adjacent antenna site. This requires coverage overlap for a sufficient distance and/or period of time to support the mechanism of the call handoff.

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SEARCH RING METHODOLOGY (CONT.)

- **Quality of Service.** Users of wireless communications services want to use their services where they live, work, commute and play, including when they are indoors. T-Mobile's coverage objectives include the ability to provide indoor coverage in areas where there are residences, businesses and indoor recreational facilities.
- **Radio Frequencies Used by System.** The designs of wireless communications systems vary greatly based upon the radio frequencies that are used by the carrier. If the carrier uses radio frequencies in the 600 MHz to 850 MHz range, the radio signals will travel farther and will penetrate buildings better than the radio frequencies in the 2100 MHz band. As a result, wireless communications systems that use lower radio frequencies will need fewer sites than wireless communications systems that use higher radio frequencies.
- **Land Use Classifications.** T-Mobile's ability to construct a WCF site on any particular property is affected by state and local regulations, including zoning and comprehensive plan classifications, goals, and policies. T-Mobile's search rings take these laws and regulations into consideration.

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ASSURANCE DEVELOPMENT

Attachment 19

NEPA Report, dated March 14, 2025 *(New)*

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TRILEAF

environmental architecture engineering

NEPA Report

March 14, 2025



US-CA-5363 Holtville

1734 East Underwood Road

Holtville, Imperial County, California 92250

Trileaf # 754155

Prepared For:

VB BTS III, LLC

750 Park of Commerce Drive

Boca Raton, FL 33487

Prepared By:

Trileaf Corporation

2121 W. Chandler Blvd., Suite 108

Chandler, AZ 85224

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TRILEAF

environmental architecture engineering

NEPA Report Summary

Site Name/Location:

US-CA-5363 Holtville / Trileaf # 754155
1734 East Underwood Road, Holtville, Imperial County, California 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Project Description:

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

1. Is the facility located in an officially designated wilderness area? [47 CFR 1.1307 (a)(1)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Review of 7.5-Minute USGS Topographic Map (Appendix B)
National Wilderness Preservation System Website (www.wilderness.net)

2. Is the facility located in an officially designated wildlife preserve? [47 CFR 1.1307 (a)(2)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Review of 7.5-Minute USGS Topographic Map (Appendix B)
US Fish & Wildlife Service National Wildlife Refuge System Map (Appendix B)

3. Will the facility: (i) affect listed threatened or endangered species or designated critical habitats; or (ii) jeopardize the continued existence of any proposed endangered or threatened species; or is it likely to result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973? [47 CFR 1.1307 (a)(3)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Review of US Fish & Wildlife Service Critical Habitat and Federally Listed Endangered Species (Appendix D)
Informal Biological Assessment (Appendix D)
California Department of Fish and Wildlife

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering or culture, that are listed, or are eligible for listing on the State or National Registers of Historic Places? [47 CFR 1.1307 (a)(4)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Cultural Resource Investigation (Appendix E)
State Historic Preservation Office Section 106 Review (Appendix E)

5. Will the facility affect an Indian religious site? [47 CFR 1.1307 (a)(5)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Correspondence with Native American Tribes via FCC TCNS (Appendix F)
Review of Bureau of Indian Affairs Indian Reservation Map (Appendix B)

6. Will the facility be located in a "floodplain", and not be placed at least one (1) foot above the base flood elevation of the floodplain? [47 CFR 1.1307 (a)(6)]

Yes ☐ No ☒

Data Sources: Review of FEMA Flood Map (Appendix B)

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)? [47 CFR 1.1307 (a)(7)]

Yes ☐ No ☒

Data Sources: Site Reconnaissance
Review of 7.5-Minute USGS Topographic Map (Appendix B)
Review of US Fish & Wildlife Service National Wetlands Inventory Map (Appendix B)
Review of USDA NRCS Web Soil Survey Map (Appendix B)

8. Will the antenna tower or supporting structure be equipped with high intensity white lights and located in a residential neighborhood, as defined by the applicable zoning law?

Yes ☐ No ☒

Data Sources: Construction Drawings (Appendix A)
It is assumed that clients will not utilize high intensity white lights in residential areas

9. Will the facility cause human exposure to levels of radiofrequency radiation in excess of Commission-adopted guidelines?

Yes ☐ No ☒

Data Sources: Construction Drawings (Appendix A) and/or interviews with clients
Clients will comply with the established criteria regarding radio frequency exposure limits, as established at the time of this report

PC ORIGINAL PKG

Samantha Neary

Signature

March 14, 2025

Date

Samantha Neary

Name

Trileaf Corporation

Company

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NEPA Report

Introduction

Trileaf Corporation (Trileaf) completed a NEPA Review for the above-referenced VB BTS III, LLC (VB BTS III, LLC) site. The purpose of a NEPA Review is to comply with the National Environmental Policy Act (NEPA) of 1969. Trileaf performed extensive research by consulting with appropriate state and federal agencies and reviewing readily available published lists, files, data, and maps to provide our clients with a complete NEPA document. The following summarizes the scope of work Trileaf performed in accordance with the Federal Communications Commission's (FCC's) rules implementing NEPA (47 CFR Section 1.1307 (a) (1) through (8) to determine whether any of the below listed FCC special interest items would be affected by the proposed action. Referenced materials are included as attachments, where applicable and available.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. The proposed project site is located at approximately 1734 East Underwood Road, Holtville, Imperial County, California 92250 at 32° 49' 18.25" North latitude and 115° 23' 10.98" West longitude.

During Trileaf's site reconnaissance, it was observed that the site is currently surrounded by rural residential development and agricultural land

1. Will the facility be located in an officially designated wilderness area?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Holtville West" Quadrangle, California and information from the National Wilderness Preservation System (NWPS) (*http://www.wilderness.net*) to determine if the site is located within an officially designated wilderness area.

There are currently 154 officially designated wilderness areas in the State of California. The closest wilderness area to the project site is the North Algodones Dunes Wilderness Area, which is located approximately 15 miles northeast of the project site.

Based on this review, the project site is not located within an officially designated wilderness area.

2. Will the facility be located in an officially designated wildlife preserve?

Trileaf reviewed the USGS 7.5-minute topographic map titled "Holtville West" Quadrangle, California, and information from the National Wildlife Refuge (NWR) System (*http://www.fws.gov/refuges*) to determine if the site is located within an officially designated wildlife preserve or refuge.

Based on this review, the project site is not located within an officially designated wildlife preserve or refuge. A copy of the NWR System map is located in Appendix B.

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3. Will the facility (i) affect listed threatened or endangered species or designated critical habitat; or (ii) likely jeopardize the continued existence of any proposed endangered or threatened species or likely result in the destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973?

The Endangered Species Act (ESA) of 1973 (16 U.S.C. §§ 1536), as amended, protects endangered and threatened species and the ecosystems upon which they depend. As interpreted and implemented by 50 CFR 402, Section 7 of the ESA directs Federal agencies, in consultation with and with the assistance of the Secretary of the Interior, to utilize their authorities to further the purposes of the ESA. It also requires every Federal agency to ensure that any action it authorizes, funds or carries out, is not likely to jeopardize the continued existence of any endangered or threatened species or results in the destruction or adverse modification of critical habitat.

On December 24, 2024, a Trileaf representative visited and photographed the project site to conduct an Informal Biological Assessment (IBA). In addition, Trileaf reviewed the United States Fish and Wildlife Service (USFWS) critical habitat information and determined that the site is not located within designated critical habitat. Based on the results of our assessment, impacts to listed and/or proposed, threatened and endangered species or critical habitats resulting from the proposed action are not anticipated. Therefore, Trileaf determined that the proposed project site will have "no effect" on the species, their habitats, or designated critical habitats. Copies of the IBA and critical habitat review are located in Appendix D.

FEDERAL

On December 8, 2024, Trileaf reviewed the Section 7 Consultation guidance set forth by the USFWS – Pacific Southwest Region Office. According to guidance obtained on December 6, 2013, "no further consultation or coordination is necessary for projects where the Federal action agency or non-federal project proponent has determined that proposed project activities will have no effect on federally listed species." Agency concurrence with a no effect determination is not required under the Endangered Species Act and will not be provided by the Pacific Southwest Region Office Field Office. Therefore, as Trileaf determined the project would have no effect on listed or proposed threatened or endangered species or critical habitats, no further consultation with the USFWS was required. A copy of the USFWS' Section 7 guidance is located in Appendix D.

STATE

On December 8, 2024, Trileaf reviewed the Section 7 Consultation guidance set forth by the California Department of Fish and Game (CADFG). According to guidance obtained on March 23, 2012, agency concurrence with a "no effect" determination is not required under the Endangered Species Act and will not be provided by CADFG. A copy of the CADFG guidance is located in Appendix D.

4. Will the facility affect districts, sites, buildings, structures, or objects significant in American history, architecture, archeology, engineering, or culture that are listed, or are eligible for listing, in the National Register of Historic Places?

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is contained in, on, or within the viewshed of a building, site, district, structure, or object, significant in American history, architecture, archaeology, engineering, or culture, that is listed, or eligible for listing on the National Registers of Historic Places, or located in or on an Indian Religious Site.

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A search of the *National Historic Landmarks* (NHL), *National Register of Historic Places* (NRHP), *State Historic Preservation Office* (SHPO) files, and a field survey was conducted by Mr. Curt Duke, Secretary of Interior-qualified Archaeologist contracted by Trileaf Corporation through Duke Cultural Resources Management, to identify any cultural resources within the area of direct effects and within a 0.50-mile radius for visual effects.

It was determined that there were no historic properties identified within the Area of Potential Effects (APE) for direct effects, and no historic properties identified within the APE for visual effects. Additionally, the identification process did not locate archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs. Documentation of these reviews was submitted to the SHPO via Form 620 on January 20, 2025. The SHPO did not respond within 30 days to Trileaf Corporation's determination of No Historic Properties in the Direct Area of Potential Effects (APE) and No Historic Properties in the Visual Area of Potential Effects (APE). As outlined in the nationwide programmatic Agreement (NPA), this establishes a presumption that SHPO concurs with the applicant's determination that the proposed undertaking will have No Historic Properties in the Direct Area of Potential Effects (APE) and No Historic Properties in the Visual APE. A copy of the SHPO guidance, Form 620, and associated documents are located in Appendix E.

On December 9, 2024, Mr. Chuck Storey, County Clerk-Recorder of Imperial County and the Imperial County Historical Society were notified of the proposed project and invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. Additionally, a legal notice regarding the proposed telecommunications tower construction was posted in the *Holtville Tribune* on December 19, 2024. No comments from the local government, historical society, or legal notice have been received by Trileaf. Copies of the correspondence and legal notice are located in Appendix E.

NATIONAL SCENIC TRAILS

On October 5, 1999, the Cellular Telecommunications Industry Association, Personal Communications Industry Association, Appalachian Trail Conference, American Hiking Society, and representative Managing and Supporting Trails Organizations (MSTOs) for the National Scenic Trails signed a resolution for the Siting of Wireless Telecommunications Facilities Near National Scenic Trails. This resolution states that if a wireless telecommunications or site management company plans a new or significantly expanded facility within one mile of a National Scenic Trail, it will notify the non-profit group that supports the trail.

In order to determine if the site is located within one mile of a National Scenic Trail, Trileaf reviewed information from the National Park Service (NPS) National Trails System created by the National Trails System Act of 1968.

Based on this review, the project site is not located within 1 mile of a National Scenic Trail. A copy of the trails map is located in Appendix B.

5. Will the facility affect any Indian religious sites?

Trileaf referred to Section 106 of the National Historic Preservation Act (NHPA) of 1966 as amended (16 U.S.C. §§ 470 et seq.), the Advisory Council on Historic Preservation (ACHP) implementing regulations (36 CFR Part 800) and the Nationwide Programmatic Agreement (NPA) for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission dated September 2004 to determine if the project site is located in or on an Indian Religious Site.

On November 26, 2024, Trileaf submitted project information through the Tower Construction Notification System (TCNS) to the FCC who initiated contact with the tribes on November 9, 2024. On January 27,

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2025, the Viejas Band of Kumeyaay Indians responded they had determined the proposed project site to have cultural significance or ties to Viejas, and requested that a Kumeyaa Cultural Monitor be on site for ground disturbance and to inform them of "any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remails." As of March 14, 2025, all other tribes have confirmed clearance either directly or by default via the FCC referral process. Trileaf determined that the subject Property is not located on or near a Native American Religious or Sacred Site. However, if archaeological remains or resources are unearthed during construction activities, Trileaf recommends that the client stop construction and notify our office immediately. Tribal consultation documentation and associated correspondence is located in Appendix F.

6. Will the facility be located in a floodplain and not be placed at least one (1) foot above the base flood elevation of the floodplain?

Trileaf reviewed the relevant Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Panel #06025C1734C, dated September 26, 2008, to determine if the project was located within the 100-year floodplain.

Trileaf determined that the property is located in Zone X, areas determined to be outside the 500-year floodplain. Therefore, the project site is not located within a 100-year floodplain. A copy of the FEMA FIRM showing the project site location is located in Appendix B.

7. Will the construction of the facility involve significant change in surface features (e.g. wetland fill, deforestation, or water diversion)?

Trileaf determined through site reconnaissance, review of the relevant USGS 7.5-minute topographic map titled "Holtville West" Quadrangle, California, and review of the relevant USFWS National Wetlands Inventory Map (*http://www.fws.gov/wetlands/Data/Mapper.html*) that there are no federally designated wetlands on or in the immediate vicinity of the proposed project site.

Trileaf's site assessment did not reveal any evidence of potential wetlands or hydrophytic vegetation located on or in the immediate vicinity of the project site. Additionally, a review of the United States Department of Agriculture (USDA) Soil Survey (*http://websoilsurvey.sc.egov.usda.gov*) did not indicate hydric soils at the project site.

Based on this review, no designated wetland areas were located within the vicinity of this project and no significant changes in surface features resulting from the proposed undertaking are anticipated. Copies of the soil map and wetlands map are located in Appendix B.

8. Zoning/High Intensity White Lights/Radio Frequency

As a standard practice, VB BTS III, LLC does not construct facilities requiring high intensity white lights that are to be located in residentially zoned neighborhoods. According to VB BTS III, LLC, high intensity white lights will not be used for towers less than 500 feet in height.

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9. Radio Frequency

FCC licensees transmitting from antennas mounted on VB BTS III, LLC owned antenna structures will comply with the established criteria regarding radio frequency exposure limits in accordance with the *Second Report and Order*, as well as the FCC Code of Federal Regulations [47 CFR § 1.1307, § 1.1310] published at the time of this report.

Conclusion

A NEPA Review of the proposed undertaking was performed by Trileaf Corporation in conformance with the FCC rules and regulations for implementing NEPA; 47 CFR 1.1301 to 1.1319.

Based on data obtained during the Site visit, consultation with government agencies, and a review of readily available information from other sources, the preparation and filing of an Environmental Assessment will not be required and no further NEPA-related action is required for the proposed undertaking.

Qualifications

Samantha Neary
Assistant Project Manager

Brandy Moss
Quality Assurance
Senior Project Manager

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Appendix A

Site Plans

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PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 120' MONOPOLE WITH (12) 8' ANTENNAS, (12) RRU'S, (1) 2' MICROWAVE, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) BACK-UP DIESEL GENERATOR, (2) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON H-FRAME WITHIN A 40'x40' FENCED LEASE AREA. NO WATER OR SEWER SERVICE IS REQUIRED. THIS WILL BE AN UNMANNED FACILITY.

CODE COMPLIANCE:

ALL WORK AND MATERIALS SHALL BE PERFORMED AND INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUCTED TO PERMIT WORK NOT CONFORMING TO THESE CODES.

1. 2022 CALIFORNIA BUILDING CODE
2. 2022 CALIFORNIA TITLE 24
3. 2022 CALIFORNIA FIRE CODE
3. 2022 CALIFORNIA ELECTRIC CODE
4. 2022 CALIFORNIA ENERGY CODE
5. 2022 CALIFORNIA MECHANICAL CODE
6. TIA/EIA-222-H OR LATEST EDITION
5. ANY LOCAL BUILDING CODE AMENDMENTS TO THE ABOVE
6. CITY/COUNTY ORDINANCES

verticalbridge

US-CA-5363 HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

120' MONOPOLE

TENANT SITE ID: SD07772

APPROVAL BLOCK				
		APPROVED	APPROVED AS NOTED	DISAPPROVED REVISE
VERTICAL BRIDGE	DATE	☐	☐	☐
SITE ACQUISITION	DATE	☐	☐	☐
CONSTRUCTION MANAGER	DATE	☐	☐	☐
PERMITTING	DATE	☐	☐	☐
RF ENGINEERING	DATE	☐	☐	☐



VICINITY MAP
N.T.S.

DRAWING INDEX	
DRWG. #	TITLE
T1	TITLE SHEET
LS-1	BOUNDARY DETAILS
LS-2	TOPOGRAPHIC SURVEY
A1	SITE PLAN
A2	ENLARGED COMPOUND PLAN
A3	EQUIPMENT AND ANTENNA PLAN
A4	ELEVATIONS



LOCATION MAP
N.T.S.

PROJECT INFORMATION	
SITE NAME:	HOLTVILLE
SITE NUMBER:	US-CA-5363
TENANT SITE ID:	SD07772
SITE ADDRESS:	1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
PARCEL #:	045-600-017
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-1 LIMITED AGRICULTURAL (IMPERIAL COUNTY)
ZONING JURISDICTION:	IMPERIAL COUNTY
CONSTRUCTION TYPE:	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE:	MONOPOLE
STRUCTURE HEIGHT:	120'
CONSTRUCTION AREA:	1,600 SQ. FT.
GROUND ELEVATION:	X' (NAVD88)
LATITUDE (NAD 83):	XX° (X° X' X" N)
LONGITUDE (NAD 83):	-X° (X° X' X" W)

EMERGENCY:
CALL 911

UNDERGROUND SERVICE ALERT
(800) 642-2444
WWW.CALIFORNIA811.ORG
CALL 2 TO 14 WORKING DAYS UTILITY NOTIFICATION PRIOR TO CONSTRUCTION

PROJECT DIRECTORY	
PROPERTY OWNER:	GONZALES JESUS DIAZ & PRISCILLA (JT) 1734 E UNDERWOOD RD, HOLTVILLE, CA 92250
APPLICANT:	VERTICAL BRIDGE 750 PARK OF COMMERCE DR. #200 BOCA RATON, FL 33487
CONTACT:	ASSURANCE DEVELOPMENT 1499 HUNTINGTON DR. #305 SOUTH PASADENA, CA 91030 CONTACT: BILL LEWIS PHONE: 626.765.5079
POWER COMPANY:	IMPERIAL IRRIGATION DISTRICT
TELCO COMPANY:	AT&T

CLIENT
verticalbridge
750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.8367

SITE ACQUISITION
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

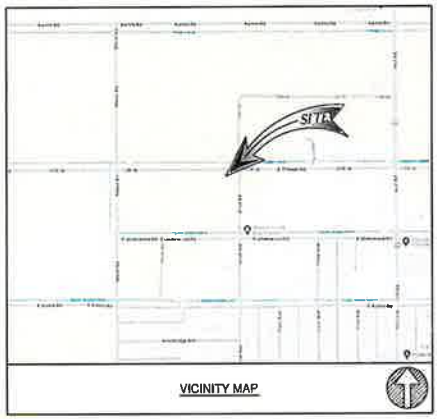
ENGINEER STAMP:

DRAWING TITLE:
TITLE SHEET

DRAWING SCALE: AS NOTED
DATE: 08/16/24
ZD

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DRAWING NUMBER:
T1



VICINITY MAP

APN

045-600-017, IMPERIAL COUNTY, CALIFORNIA

BASIS OF ELEVATIONS: (NAVD 1988)

SITE ELEVATIONS ARE ESTABLISHED FROM THE GPS DERIVED ORTHOMETRIC HEIGHTS BY APPLICATION OF NGS "GEOID 12A" MODELED SEPARATIONS TO ELLIPSOID HEIGHTS DETERMINED BY OBSERVATIONS OF THE "LEICA SMARTNET" REAL TIME NETWORK. ALL ELEVATIONS SHOWN HEREON ARE REFERENCED TO NAVD88, CALIFORNIA ZONE 6.

FLOOD ZONE

SITE IS LOCATED IN FLOOD ZONE "X" AS PER F.I.R.M. MAP NO 06025C1734C EFFECTIVE DATE 9/26/2008.

LEGEND

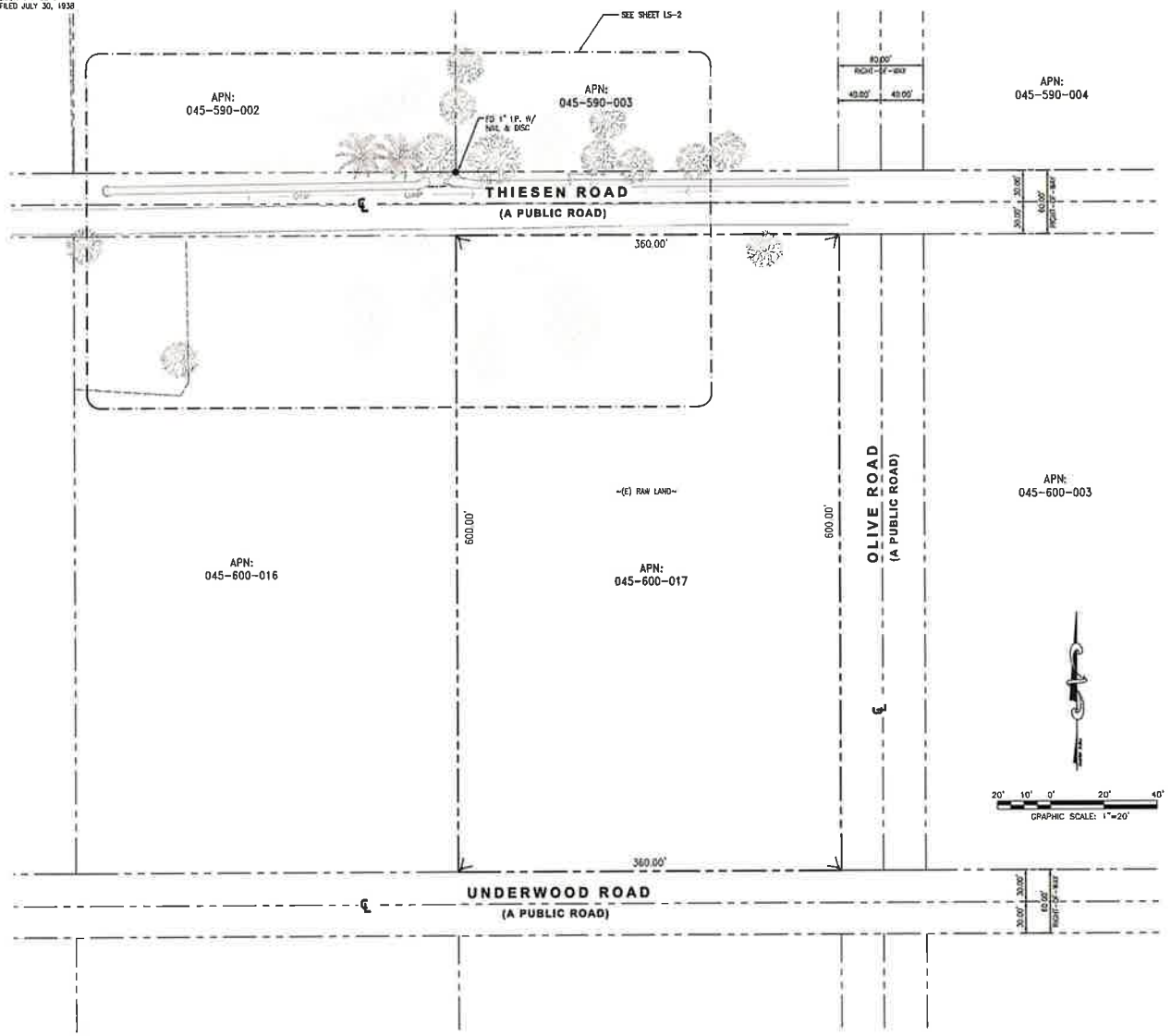
- CENTER LINE
- PROPERTY LINE
- CHAIN-LINK FENCE
- EASEMENT LINE
- CMU WALL
- PALM TREE
- TREE

MONUMENTS

- MONUMENT FD. (AS NOTED)

REFERENCE MAP

1. PLAT OF LINCOLN HEIGHTS SUBDIVISION BOOK 1 PAGE 94 FILED JULY 30, 1938



SURVEYOR CERTIFICATION

I HEREBY CERTIFY TO: VERTICAL BRIDGE RDT, LLC, A DELAWARE LIMITED LIABILITY COMPANY, ITS SUBSIDIARIES, AND THEIR RESPECTIVE SUCCESSORS AND/OR ASSIGNS; AND (II) TORONTO DOMINION (TEXAS) LLC, AS ADMINISTRATIVE AGENT, FOR ITSELF AND ON BEHALF OF THE LENDERS PARTIES FROM TIME TO TIME TO THAT CERTAIN SECOND AMENDED AND RESTATED LOAN AGREEMENT DATED JUNE 17, 2016 WITH VERTICAL BRIDGE HOLDCO, LLC, AS BORROWER, AND VERTICAL BRIDGE HOLDCO PARENT, LLC, AS PARENT, AS MAY BE AMENDED, RESTATED, MODIFIED OR RENEWED, THEIR SUCCESSORS AND ASSIGNS AS THEIR INTERESTS MAY APPEAR; AND MORTGAGE CONNECT TO IRON CREST NATIONAL TITLE COMPANY.

ANDREW J. KOLTAVARY, RCE 89777 EXP. 03/31/26

AUGUST 12, 2024
DATE

ENCROACHMENT STATEMENT GUIDELINES

AT THE TIME OF THE SURVEY, NO VISIBLE ENCROACHMENTS WERE EVIDENT ONTO OR BEYOND THE LEASE AREA OR ANY VB EASEMENTS.

PC ORIGINAL PKG

SURVEY PREPARED FOR:

verticalbridge

VB BTS II, LLC

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.216.2024

ENGINEER

AJK ENGINEERING

24 RECODO
IRVINE, CA 92618
714.624.3927

NO.	SUBMITTAL / REVISION	BY	DATE
0	PRELIMINARY SURVEY	LA	08/12/24

DRAWN: LA
DESIGNED:
CHECKED: AJK

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
HOLTVILLE

1734 E. UNDERWOOD RD.,
HOLTVILLE, CA 92250-9642
IMPERIAL COUNTY

ENGINEER STAMP:

REGISTERED PROFESSIONAL ENGINEER ANDREW J. KOLTAVARY No. 89571 EXP. 03/31/26 CIVIL STATE OF CALIFORNIA

DRAWING TITLE:

BOUNDARY DETAILS

DRAWING SCALE: AS NOTED

DATE: 08/12/2024

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DRAWING NUMBER:

LS-1

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LEGEND

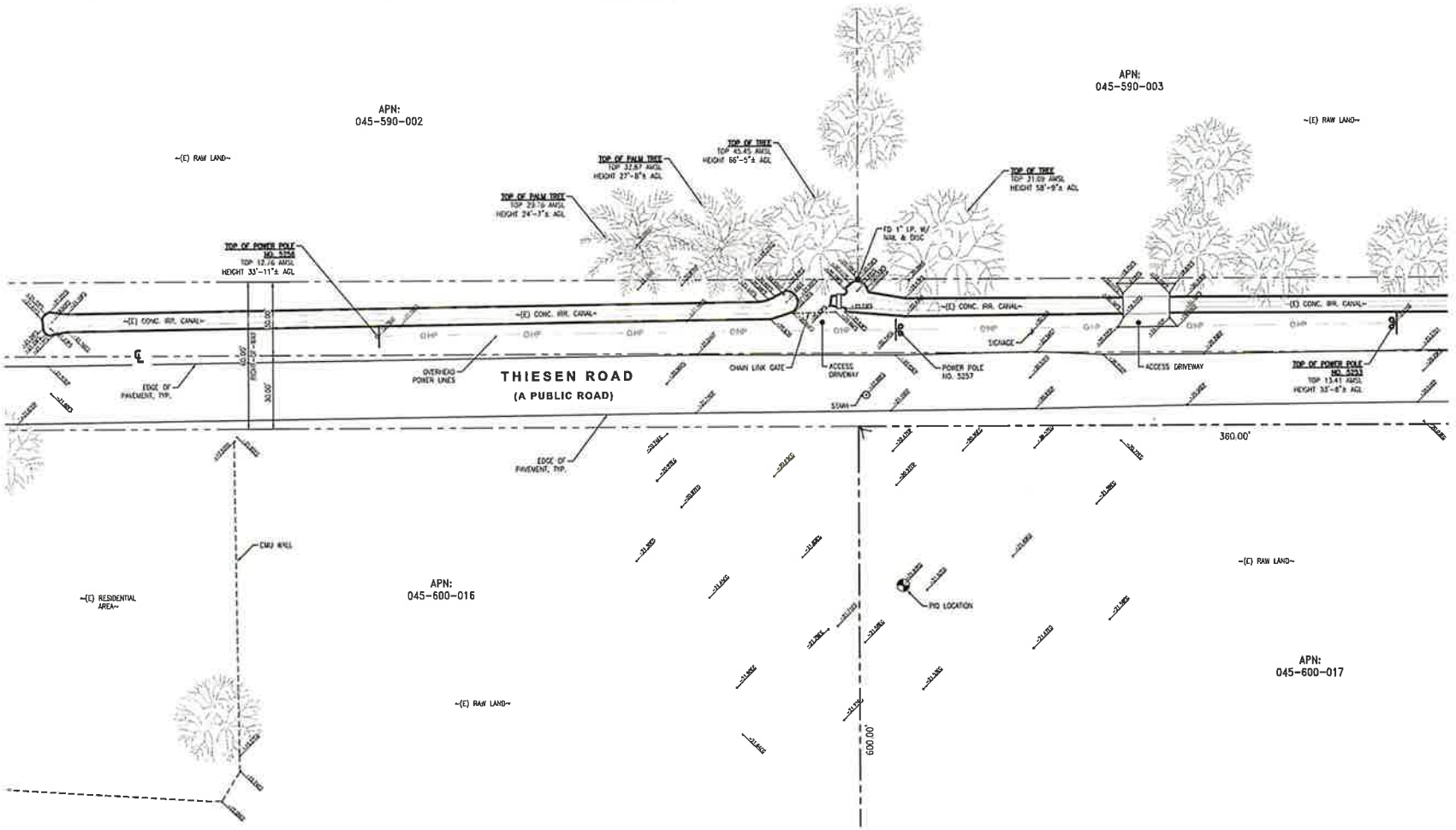
	CENTER LINE	TB	TOP OF BUILDING
	PROPERTY LINE	BW	BACK OF WALK
—x—x—	WIRED FENCE	TPOB	TRUE POINT OF BEGINNING
—\/\/\/—	WOODEN FENCE	POB	POINT OF BEGINNING
—C—C—	CONDUIT	AGL	ABOVE GRADE LEVEL
—OH—OH—	OVERHEAD ELECTRICAL LINE		EXISTING STREET LIGHT
	SEWER LINE		EXISTING SIGN
	CMU WALL		GUY WIRE
EG	EXISTING GRADE		POWER POLE
EP	EDGE OF PAVEMENT		FIRE HYDRANT
FS	FINISH SURFACE		PINE TREE
HT	HEIGHT		TREE
TC	TOP OF CURB		BUSHES
FL	FLOW LINE		
TT	TOP OF TRCC		

MONUMENTS

- MONUMENT FD. (AS NOTED)

NOTES:

1. THIS IS NOT A BOUNDARY SURVEY. THIS IS A SPECIALIZED TOPOGRAPHIC MAP. THE PROPERTY LINES AND EASEMENTS SHOWN HEREON ARE FROM RECORD INFORMATION AS NOTED HEREON. AJK ENGINEERING AND SURVEY TRANSLATED THE TOPOGRAPHIC SURVEY TO RECORD INFORMATION USING FOUND MONUMENTS SHOWN HEREON.
2. THE HEIGHTS AND ELEVATIONS FOR THE TREES, BUSHES AND OTHER LIVING PLANTS SHOWN HEREON, SHOULD BE CONSIDERED APPROXIMATE (+/-) AND ONLY FOR THE DATE OF THIS SURVEY. THEY ARE PROVIDED AS A GENERAL REFERENCE AND SHOULD NOT BE USED FOR DESIGN PURPOSES.
3. FIELD SURVEY COMPLETED ON AUGUST 07, 2024.
4. ACCESS AND UTILITY EASEMENTS TERMINATE AT A CONFIRMED PUBLIC RIGHT OF WAY.
5. NO VISIBLE ENCROACHMENTS WERE VISIBLE ON THE LEASE OR EASEMENT AREAS AT THE TIME OF THE SURVEY.
6. THE LEASE AND EASEMENT AREA LIE ENTIRELY WITHIN THE PARENT OR ACCESS PARCEL.



SURVEY PREPARED FOR:

verticalbridge

VB BTS II, LLC

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.8367

SITE ACQUISITION

ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.216.2024

ENGINEER

AJK

34 RECORD
IRVINE, CA 92618
714.624.0607

NO.	SUBMITTAL / REVISION	BY	DATE
0	PRELIMINARY SURVEY	LA	09/13/24

DRAWN: LA
DESIGNED:
CHECKED: AJK

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
HOLTVILLE

1734 E. UNDERWOOD RD.,
HOLTVILLE, CA 92250-9642
IMPERIAL COUNTY

ENGINEER STAMP:

REGISTERED PROFESSIONAL ENGINEER
ANDREW J. KIRK
No. 26571
EXP. 03/31/26
CIVIL
STATE OF CALIFORNIA

DRAWING TITLE:

TOPOGRAPHIC SURVEY

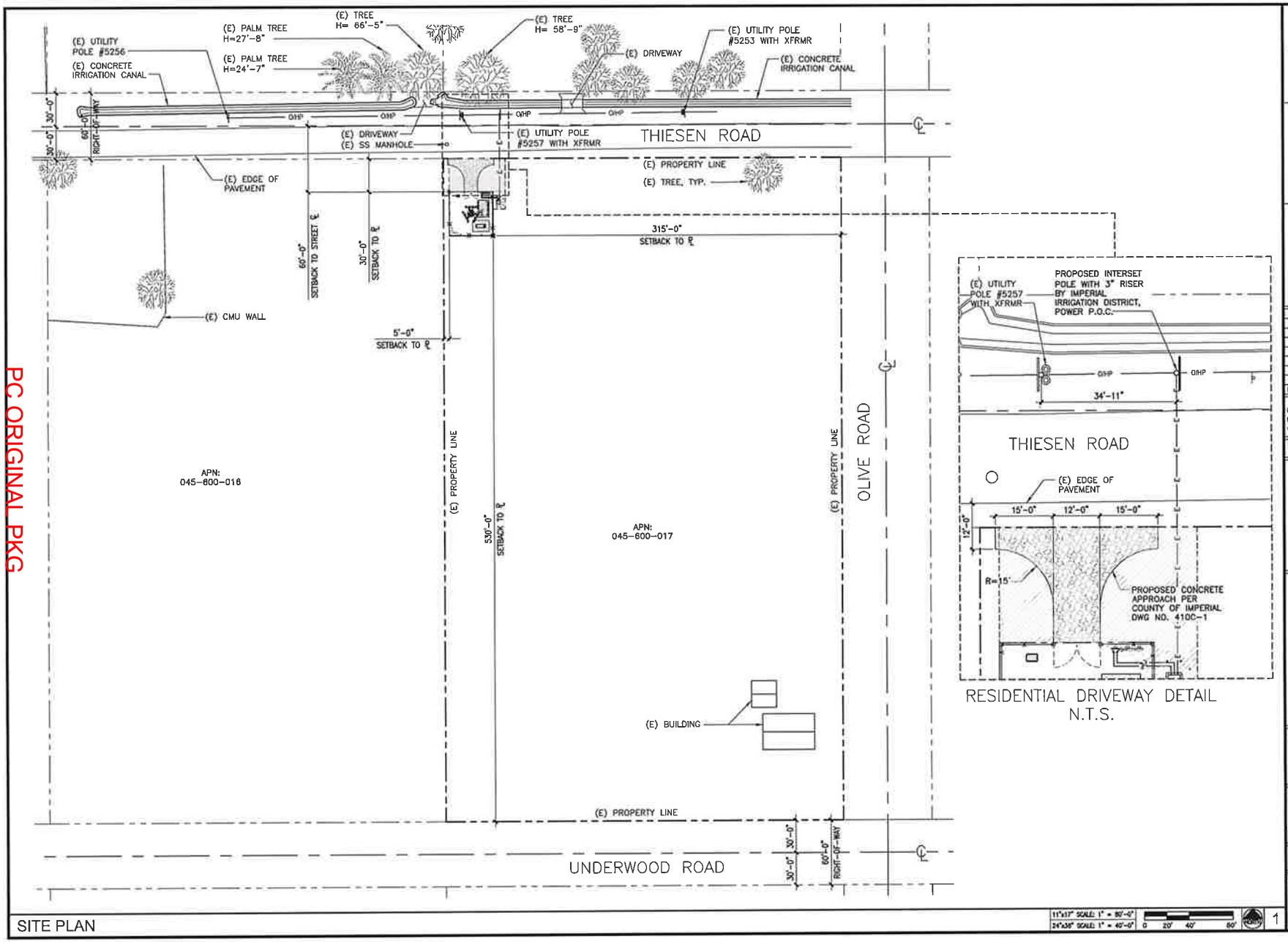
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DATE:
09/13/2024

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DRAWING NUMBER:

LS-2



RESIDENTIAL DRIVEWAY DETAIL
N.T.S.

PC ORIGINAL PKG

SITE PLAN

11"x17" SCALE: 1" = 80'-0"
24"x36" SCALE: 1" = 40'-0"
0 20' 40' 80'

1

CLIENT

verticalbridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
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626.765.5079

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US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE:

SITE PLAN

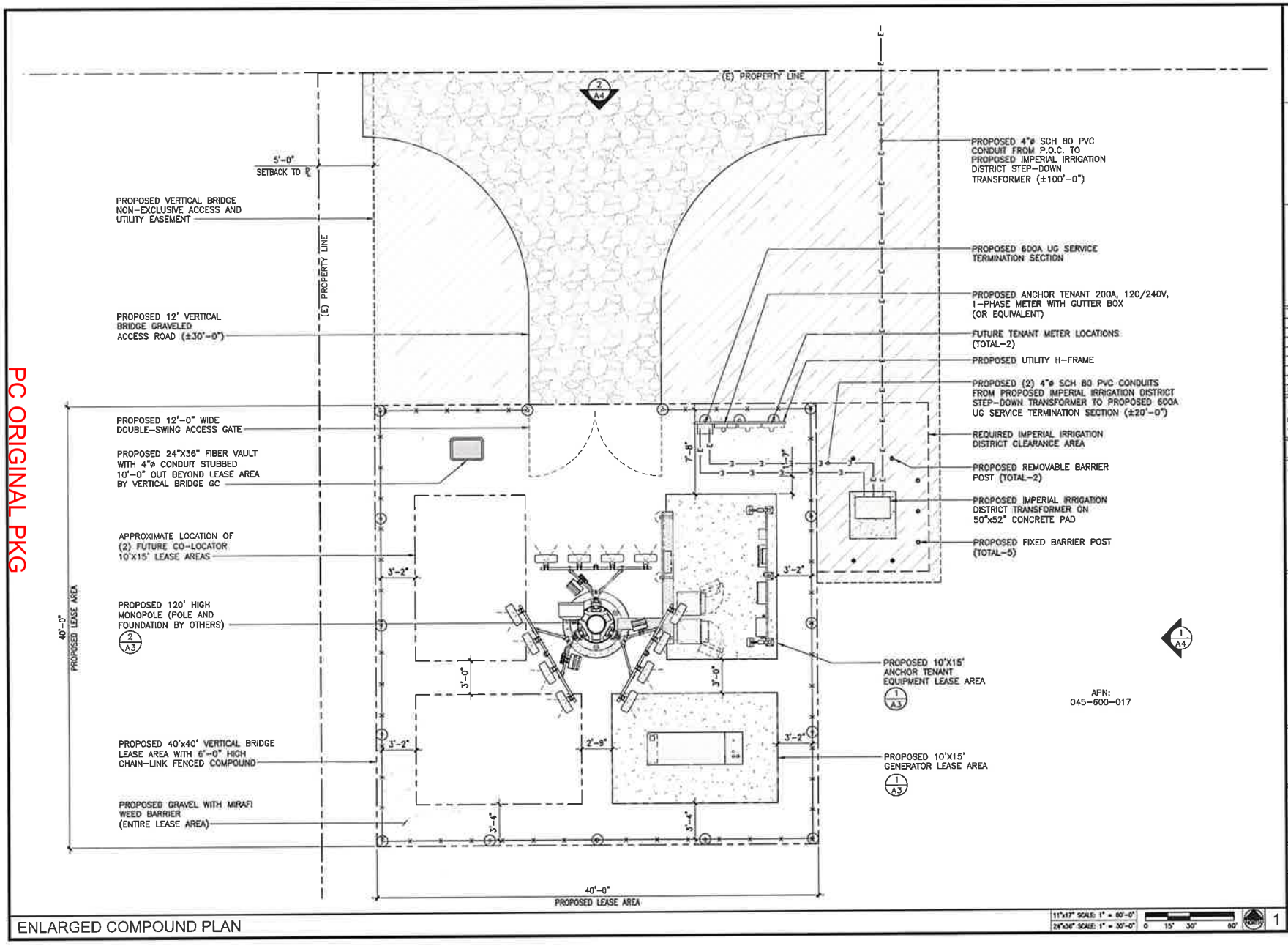
DRAWING SCALE: AS NOTED
DATE: 08/16/24

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DRAWING NUMBER:

A1



PC ORIGINAL PKG

ENLARGED COMPOUND PLAN

11"x17" SCALE: 1" = 60'-0"
24"x36" SCALE: 1" = 30'-0"
0 15' 30' 60'

1

CLIENT

verticalbridge

750 PARK OF COMMERCE DR.
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ENGINEER STAMP:

DRAWING TITLE

ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED

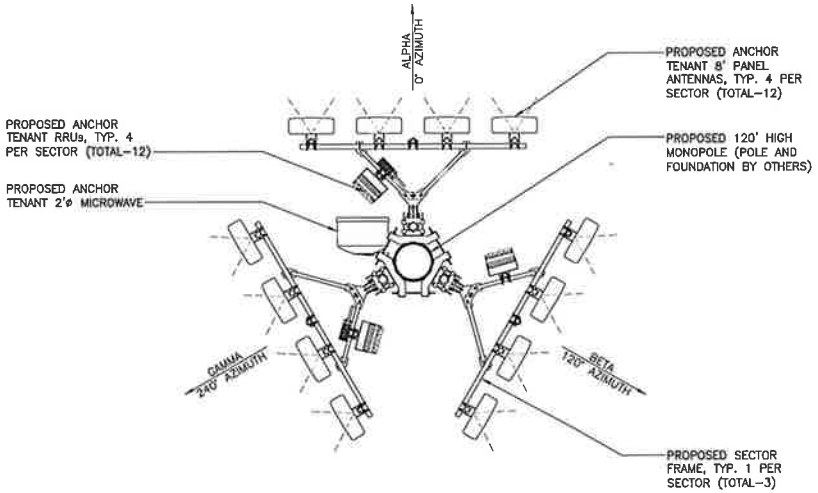
DATE: 08/16/24

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DRAWING NUMBER

A2



ANTENNA PLAN

11"x17" SCALE: 3/16" = 1'-0"
24"x36" SCALE: 3/8" = 1'-0"
0 1' 2' 4'

2

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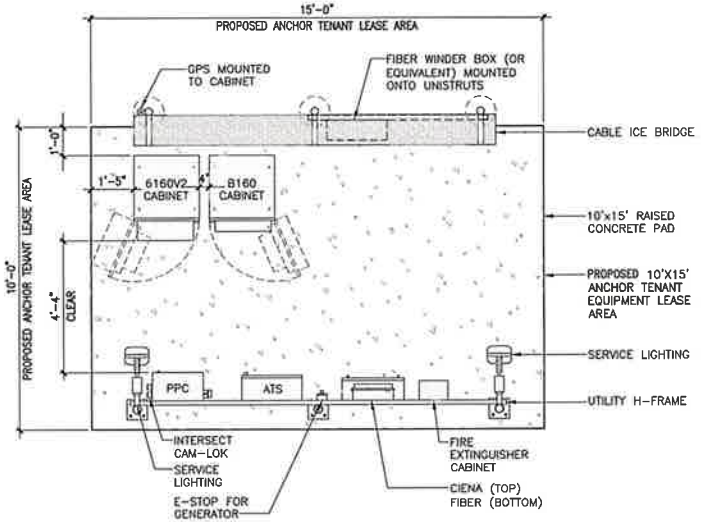
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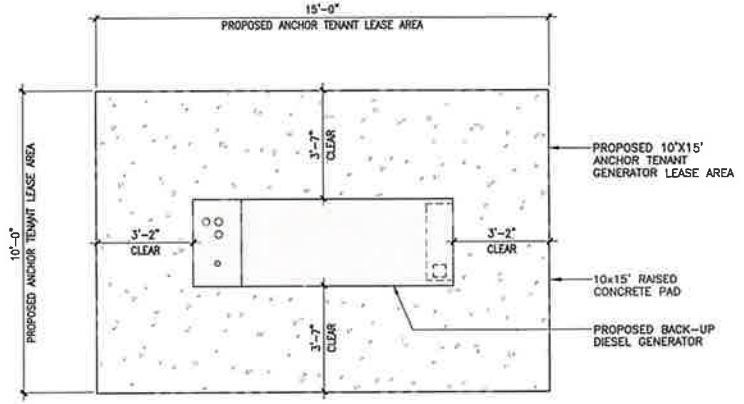
SCALE N.T.S.

3

SERVICE LIGHTING NOTES:
1. THE SERVICE LIGHT IS MANUALLY SWITCHED ON/OFF BY THE SITE TECHNICIAN IN EMERGENCY SITUATIONS.
2. MAINTENANCE OF THE CELL SITES ARE NORMALLY PERFORMED DURING DAY-LIGHT HOURS.
3. THE SERVICE LIGHT SHALL BE POINTED -45° TOWARDS THE GROUND.

SERVICE LIGHTING SPECIFICATIONS:
MODEL: PLTS-12249 (OR EQUAL)
LED WATTAGE: 15W
LUMENS: 2097 LM
FOOT CANDLE: 194.8 FC





EQUIPMENT PLAN

11"x17" SCALE: 1/4" = 1'-0"
24"x36" SCALE: 1/2" = 1'-0"
0 1' 2' 4'

1

CLIENT
verticalbridge
750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION
ASSURANCE DEVELOPMENT
1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:
US-CA-5363
SD07772
HOLTVILLE
1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE:
EQUIPMENT AND ANTENNA PLAN

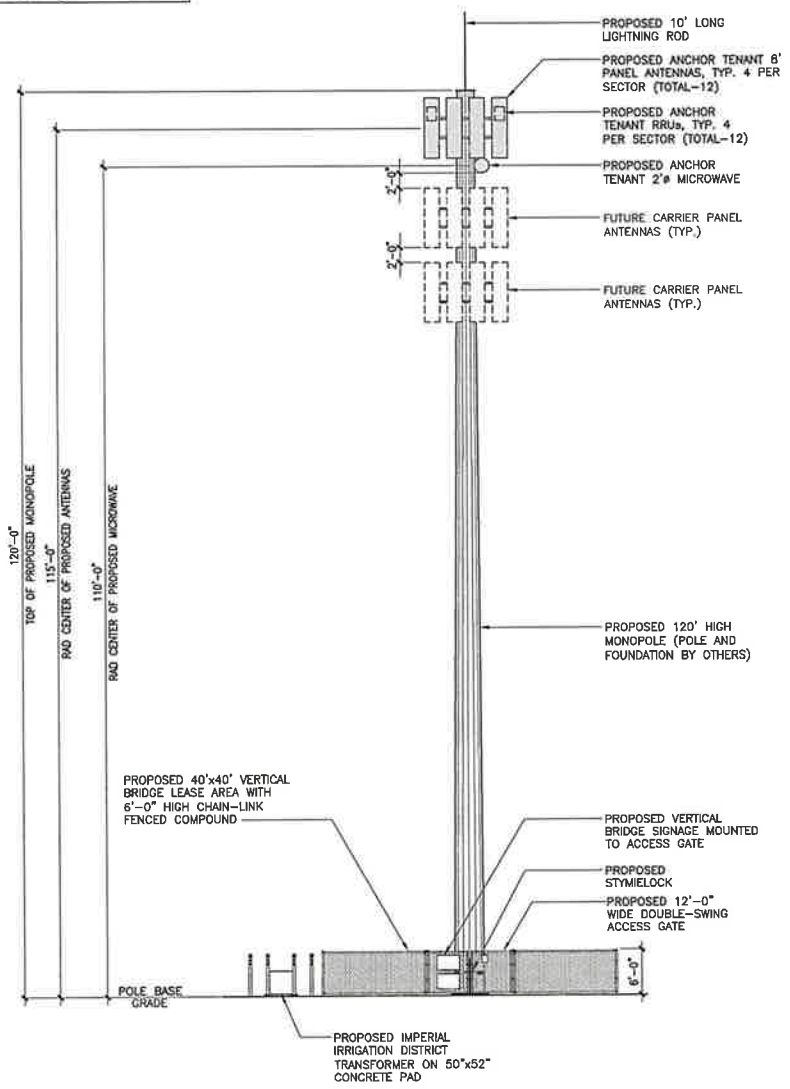
DRAWING SCALE: AS NOTED
DATE: 08/16/24
ZD

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DRAWING NUMBER:
A3

PC ORIGINAL PKG

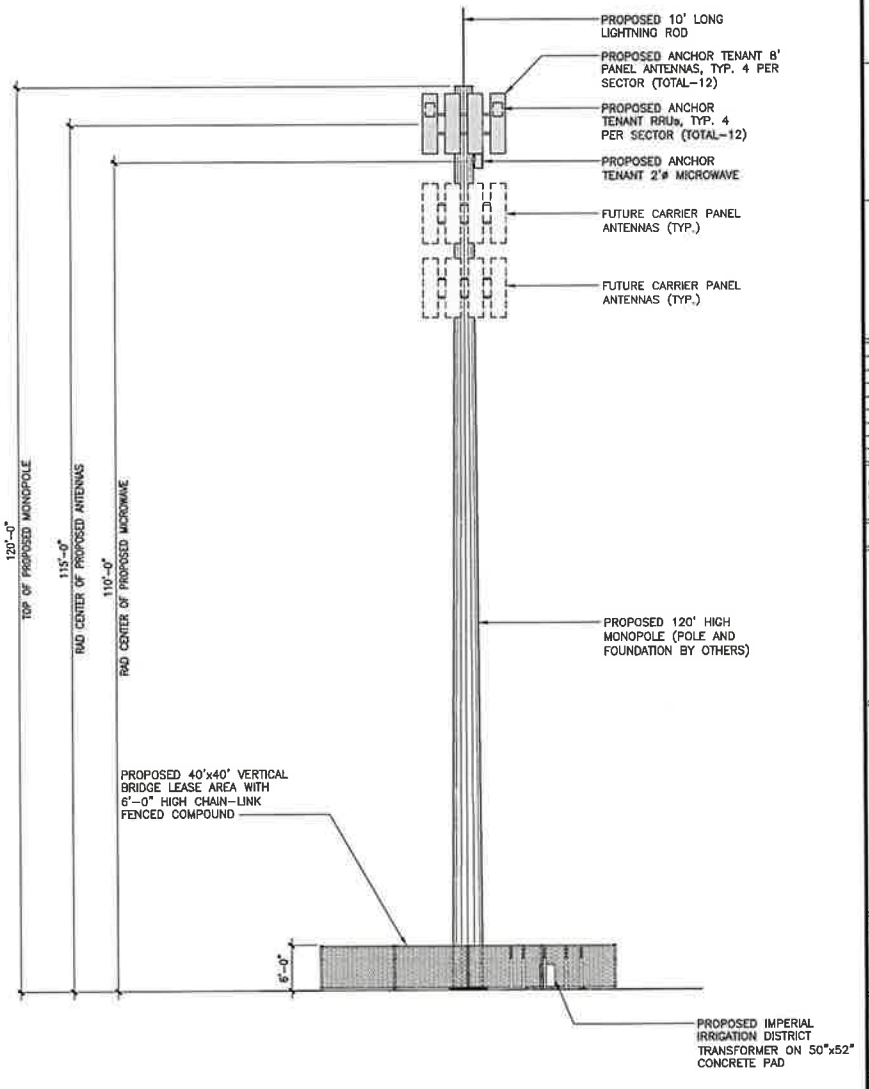
NOTES:
1. ANTENNAS AND RRUS TO BE PAINTED GREEN TO MATCH MONOPINE.



NORTH ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2' 4' 8'

2



EAST ELEVATION

11"x17" SCALE: 3/32" = 1'-0"
24"x36" SCALE: 3/16" = 1'-0"
0 2' 4' 8'

1

CLIENT

verticalbridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

NO.	SUBMITTAL / REVISION	BY	DATE
A	ISSUED FOR REVIEW	CV	08/16/24

DRAWN: CV
DESIGNED: CV
CHECKED: APP

PROJECT NUMBER: US-CA-5363

PROJECT TITLE:

US-CA-5363
SD07772
HOLTVILLE

1734 E UNDERWOOD RD,
HOLTVILLE, CA 92250

ENGINEER STAMP:

DRAWING TITLE:

ELEVATIONS

DRAWING SCALE: AS NOTED

DATE: 08/16/24

ZD

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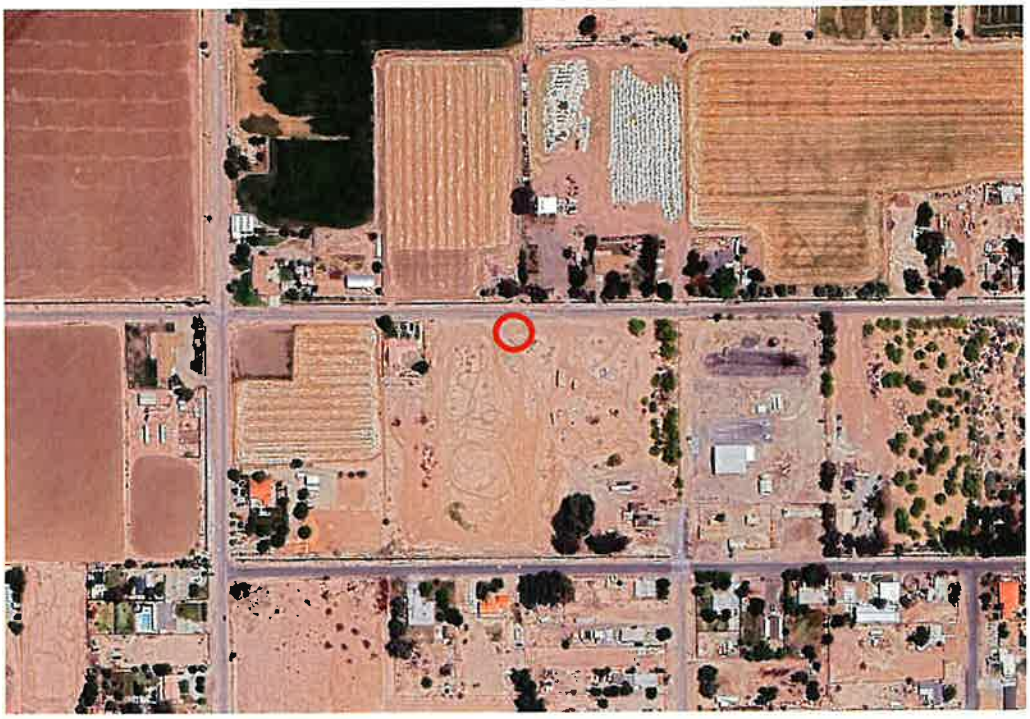
DRAWING NUMBER:

A4

Appendix B

Site Maps

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Site Location & Surrounding Properties



Site Location ----- Easement

Aerial Photographs (2024)

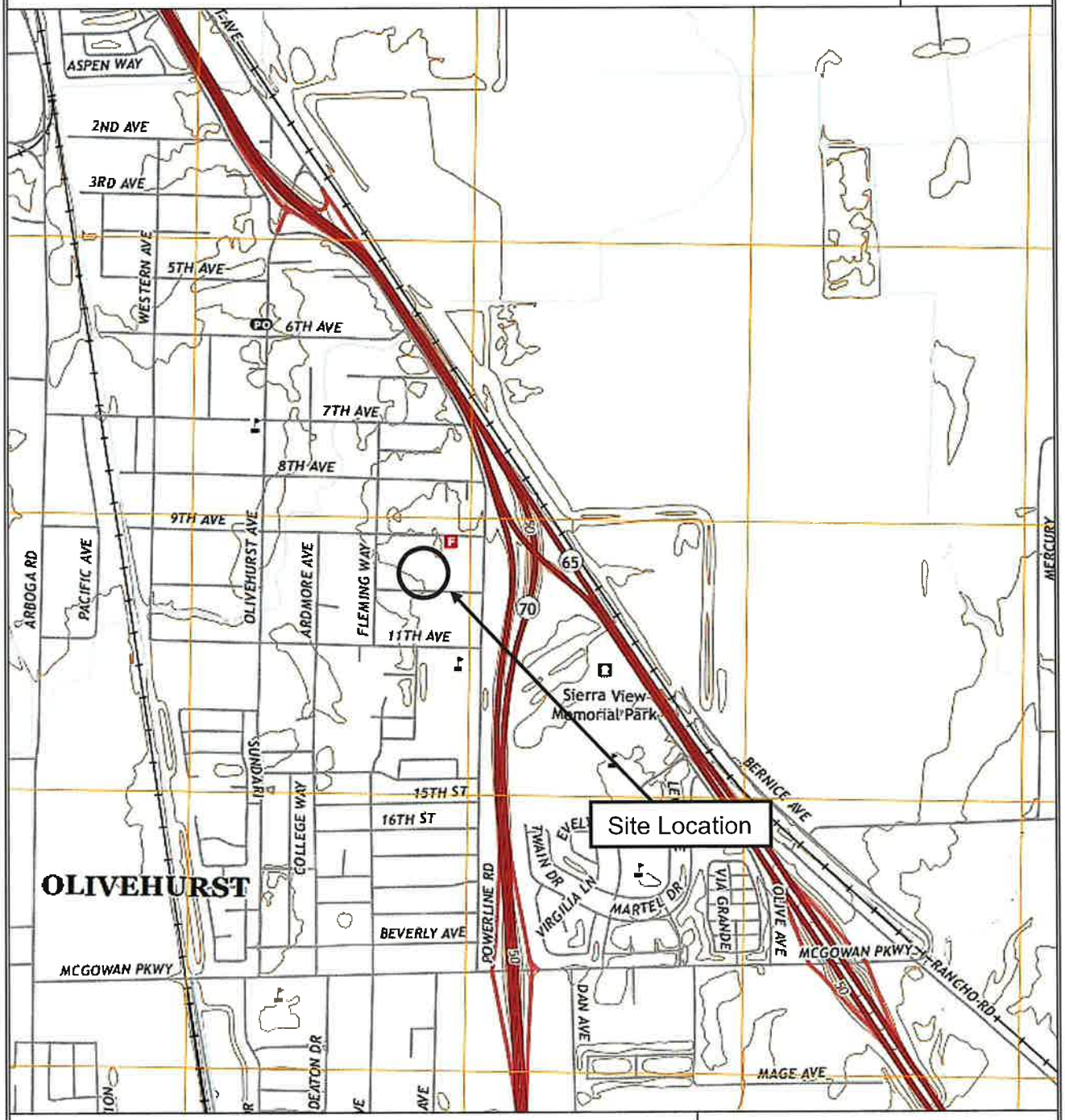
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1734 East Underwood Road
Holtville, California 92250

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Olivehurst Quadrangle, California (2021)
Contour Interval = 10 Feet
Scale 1 Inch = ~2,000 Feet
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
Township: T15S Range: R15E Section: S26

North



Site Vicinity Map

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National Flood Hazard Layer FIRMette

FEMA



Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN — Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 / 17.6 — Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/8/2024 at 5:29 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

U.S. Fish and Wildlife Service

National Wetlands Inventory

US-CA-5363 - Holtville

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December 8, 2024

Wetlands

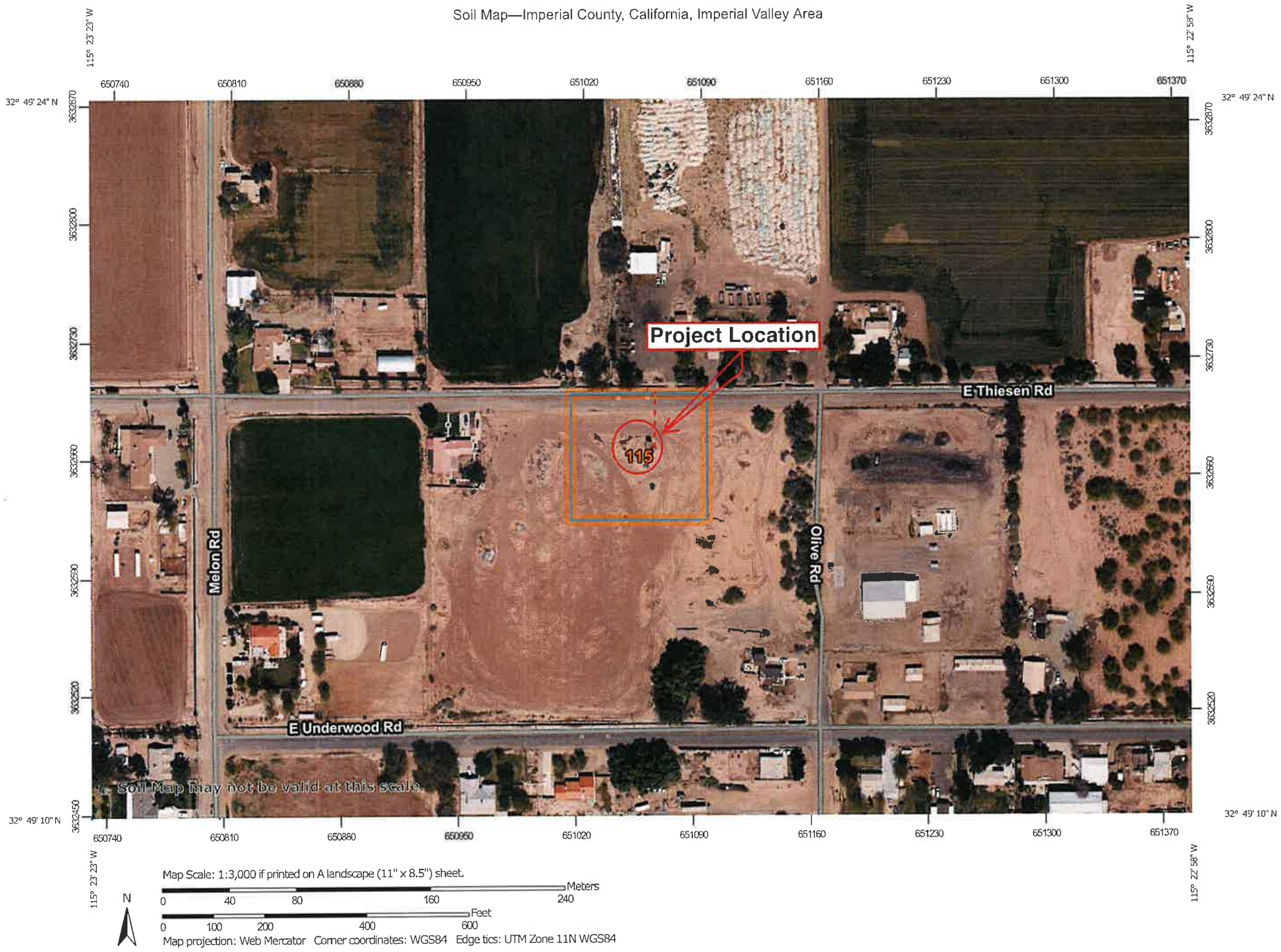
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

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Soil Map—Imperial County, California, Imperial Valley Area



MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Imperial County, California, Imperial Valley Area
Survey Area Data: Version 17, Sep 10, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Mar 17, 2021—May 22, 2021

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

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Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
115	Imperial-Glenbar silty clay loams complex, 0 to 2 percent slopes, wet	1.5	100.0%
Totals for Area of Interest		**1.5**	**100.0%**

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Imperial County, California, Imperial Valley Area

115—Imperial-Glenbar silty clay loams complex, 0 to 2 percent slopes, wet

Map Unit Setting

National map unit symbol: 2n7xh
Elevation: -230 to 200 feet
Mean annual precipitation: 0 to 3 inches
Mean annual air temperature: 72 to 75 degrees F
Frost-free period: 300 to 350 days
Farmland classification: Not prime farmland

Map Unit Composition

Imperial, wet, and similar soils: 41 percent
Glenbar, wet, and similar soils: 40 percent
Minor components: 19 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Imperial, Wet

Setting

Landform: Flood plains, lakebeds
Down-slope shape: Concave, linear
Across-slope shape: Convex, linear
Parent material: Alluvium over ancient fluviomarine deposits

Typical profile

C1 - 0 to 12 inches: silty clay loam
C2 - 12 to 24 inches: silty clay
C3 - 24 to 60 inches: silty clay

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Somewhat poorly drained
Runoff class: Very high
Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.01 in/hr)
Depth to water table: About 18 to 36 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 25 percent
Gypsum, maximum content: 2 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 2.0
Available water supply, 0 to 60 inches: High (about 9.4 inches)

Interpretive groups

Land capability classification (irrigated): 3w

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Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: D
Ecological site: R040XD007CA - Lacustrine Basin and Large RIver Floodplain
Hydric soil rating: Unranked

Description of Glenbar, Wet

Setting

Landform: Flood plains, lakebeds
Down-slope shape: Concave, linear
Across-slope shape: Convex, linear
Parent material: Alluvium over ancient fluviomarine deposits

Typical profile

C1 - 0 to 13 inches: silty clay loam
C2 - 13 to 23 inches: clay loam
C3 - 23 to 25 inches: sandy clay loam
C4 - 25 to 60 inches: silty clay loam

Properties and qualities

Slope: 0 to 2 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Somewhat poorly drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat): Moderately low (0.01 to 0.14 in/hr)
Depth to water table: About 18 to 36 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 10 percent
Gypsum, maximum content: 1 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 2.0
Available water supply, 0 to 60 inches: High (about 9.9 inches)

Interpretive groups

Land capability classification (irrigated): 1
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: D
Ecological site: R040XD007CA - Lacustrine Basin and Large RIver Floodplain
Hydric soil rating: Unranked

Minor Components

Meloland

Percent of map unit: 10 percent
Landform: Basin floors
Down-slope shape: Concave
Across-slope shape: Linear
Ecological site: R040XD007CA - Lacustrine Basin and Large RIver Floodplain

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Hydric soil rating: Unranked

Holtville, wet

Percent of map unit: 9 percent
Landform: Basin floors
Down-slope shape: Linear
Across-slope shape: Linear
Ecological site: R040XD007CA - Lacustrine Basin and Large RIver Floodplain
Hydric soil rating: Unranked

Data Source Information

Soil Survey Area: Imperial County, California, Imperial Valley Area
Survey Area Data: Version 17, Sep 10, 2024

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U.S. Fish and Wildlife Service
National Wildlife Refuge System Map

North



USFWS – Wildlife Refuge Map

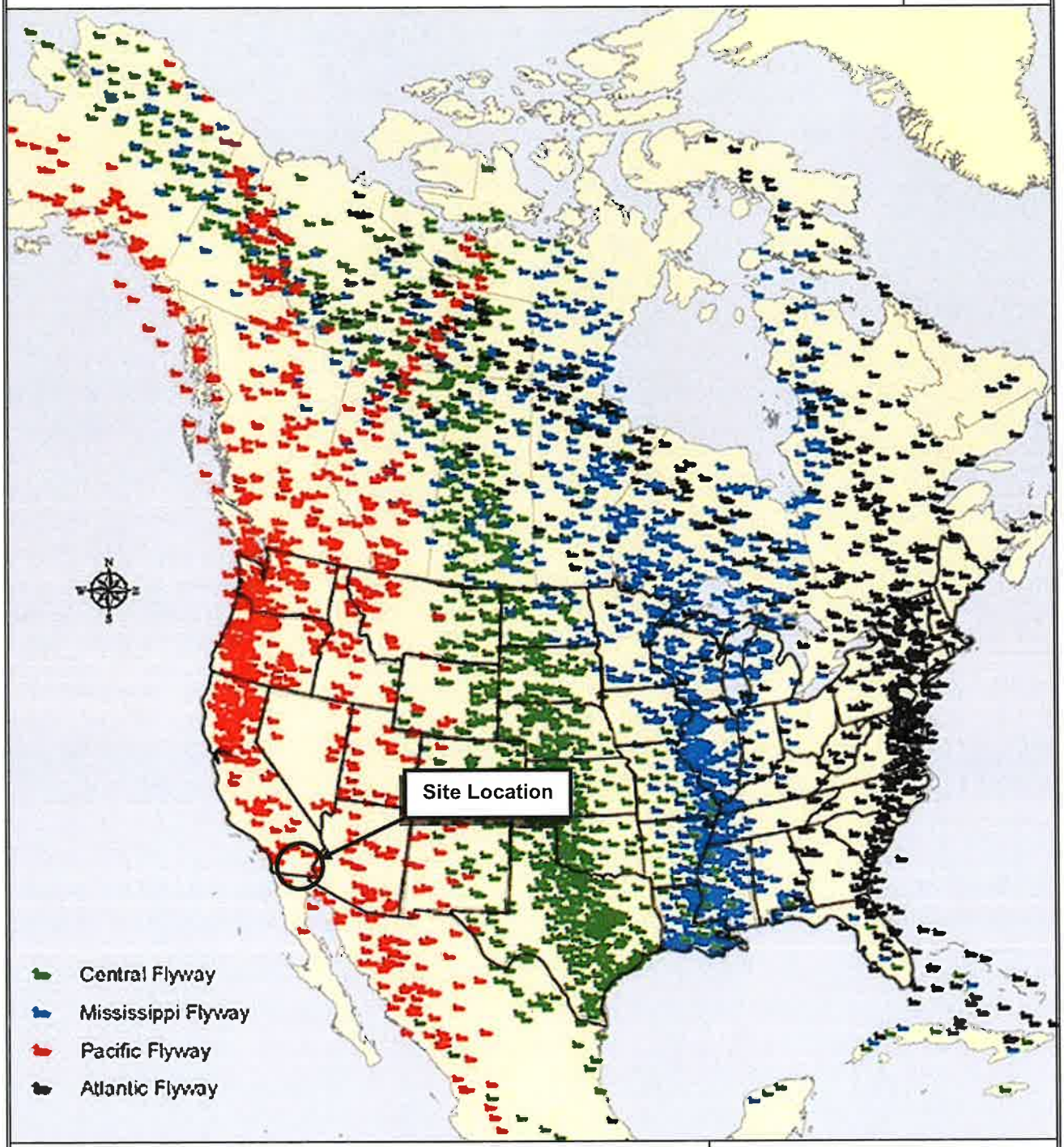
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Holtville, California 92250

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North American Migration Flyways

North



Migratory Bird Flyways – Location Map

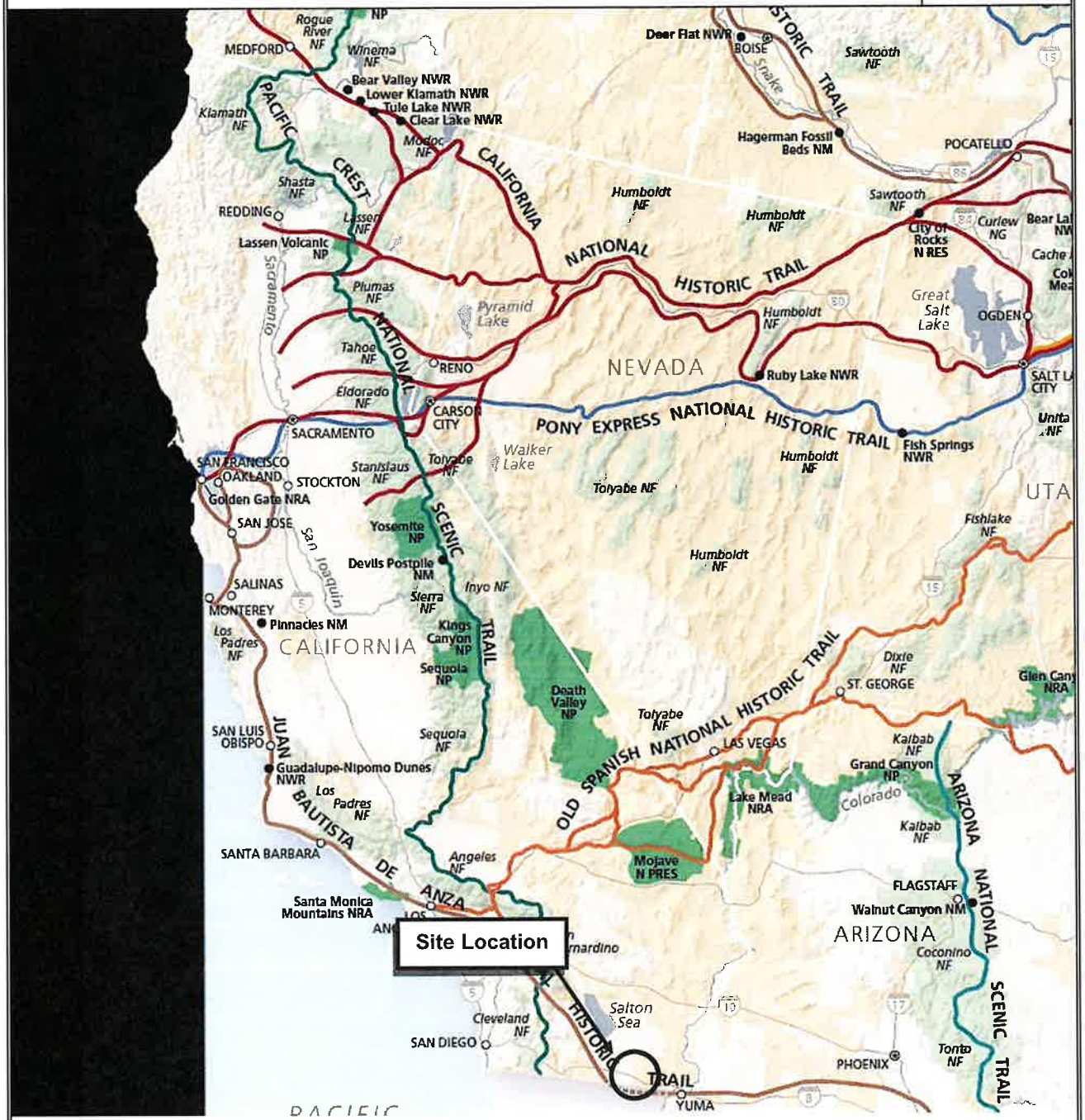
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National Park Service
National Historic Trails and Scenic Routes

North



National Park Service – Trails and Routes Map

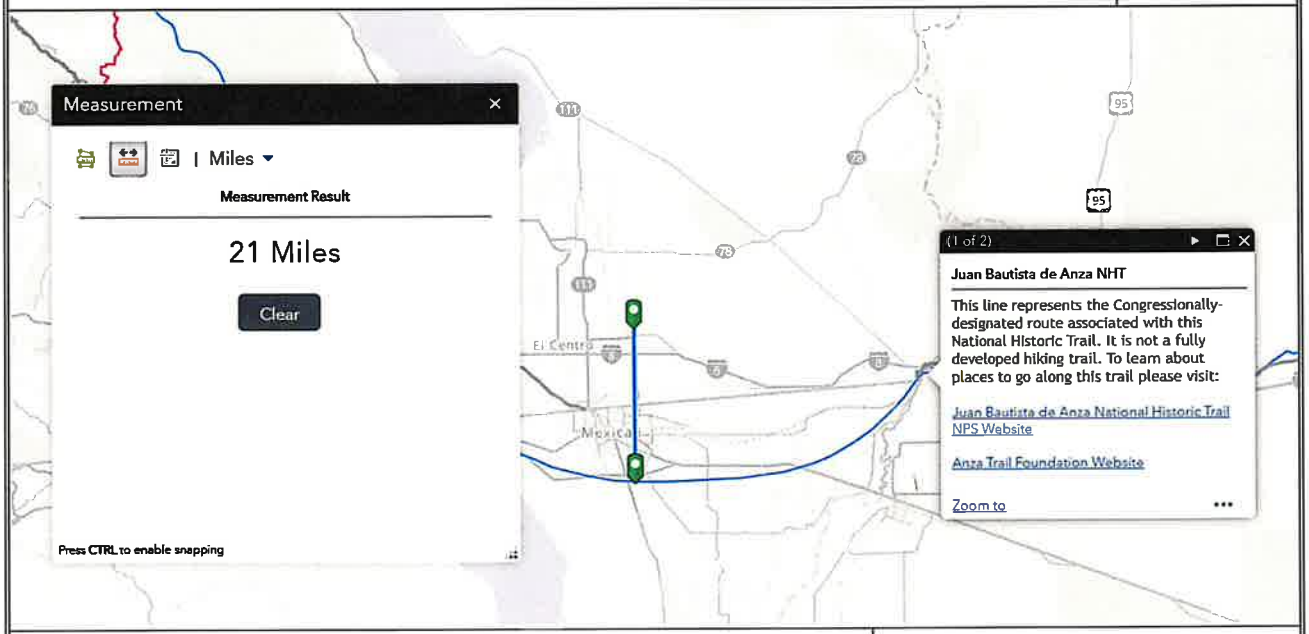
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Holtville, California 92250

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National Park Service
National Historic Trails and Scenic Routes

North



National Park Service – Trails and Routes Map

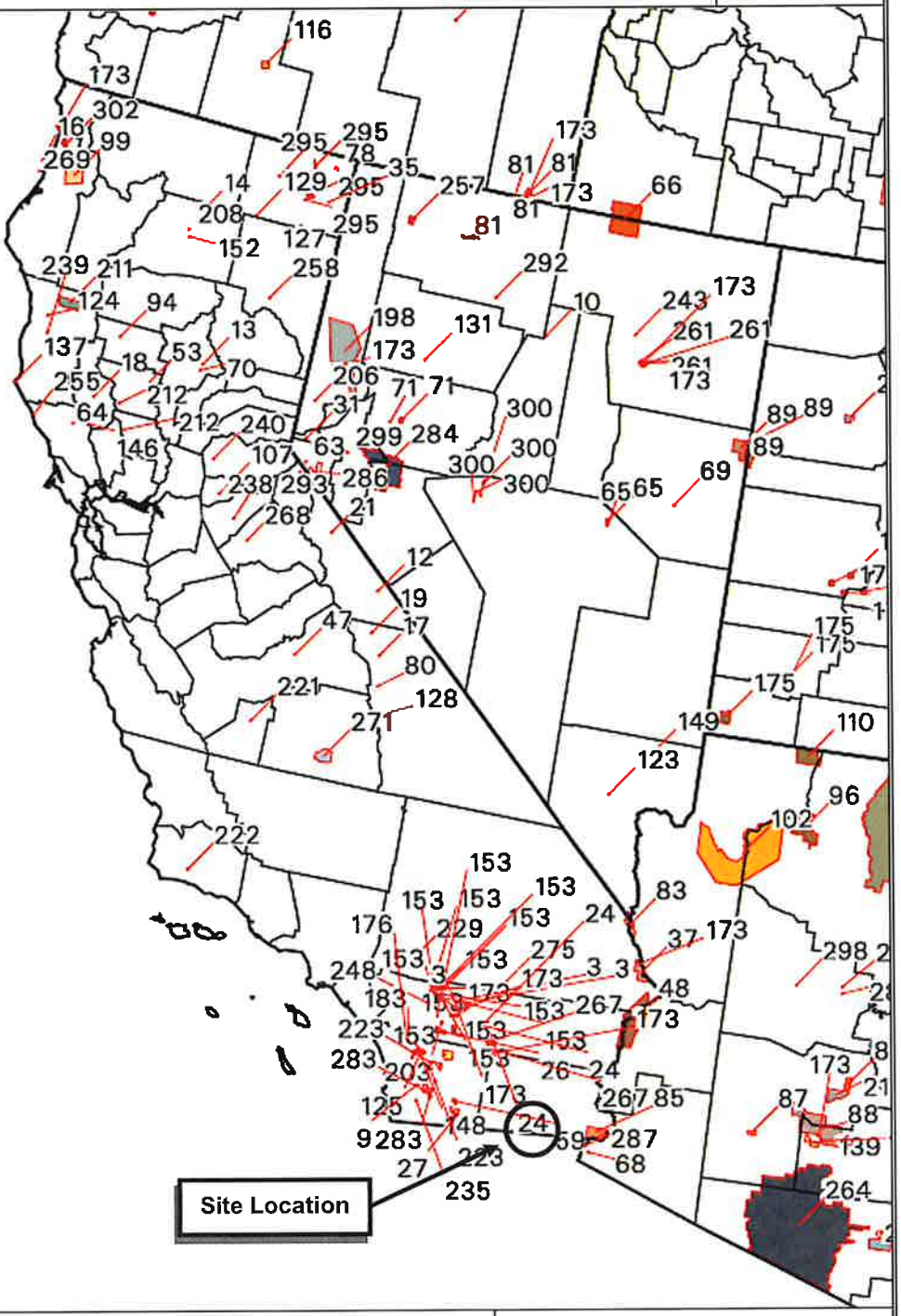
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Holtville, California 92250

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Bureau of Indian Affairs
Indian Reservation Map

North



Bureau of Indian Affairs – Reservation Map

VBS BTS III, LLC – US-CA-5363 Holtville
1734 East Underwood Road
Holtville, California 92250

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Appendix C

Site Photographs

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Site Photograph 1 – Site overview. View to south.



Site Photograph 2 – Site overview. View to east.

Site Photographs

VBS BTS III, LLC – US-CA-5363 Holtville
1734 East Underwood Road
Holtville, California 92250

Photographed:
December 23, 2024

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Site Photograph 3 – Site overview. View to north.



Site Photograph 4 – Site overview. View to west.

Site Photographs

VBS BTS III, LLC – US-CA-5363 Holtville
1734 East Underwood Road
Holtville, California 92250

Photographed:
December 23, 2024

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Site Photograph 5 – Overview of surroundings. View to north.



Site Photograph 6 – Overview of surroundings. View to east.

Site Photographs

VBS BTS III, LLC – US-CA-5363 Holtville
1734 East Underwood Road
Holtville, California 92250

Photographed:
December 23, 2024

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Site Photograph 7 – Overview of surroundings. View to south.



Site Photograph 8 – Overview of surroundings. View to west.

Site Photographs

VBS BTS III, LLC – US-CA-5363 Holtville
1734 East Underwood Road
Holtville, California 92250

Photographed:
December 23, 2024

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Appendix D

Documentation of Officially Designated Wilderness Areas, Wildlife Preserves and Endangered Species

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Southwest Region
2800 Cottage Way, Room W-2606
Sacramento, California 95825-1846

In Reply Refer to:
FWS/R8/AES

DEC 0 6 2013

Memorandum

To: Ecological Services Project Leaders, Region 8

From: Acting Assistant Regional Director, Ecological Services, Region 8

Subject: Regional Policy on "No Effect" Determinations

As you know, the implementing regulations for section 7 of the Endangered Species Act do not require a Federal action agency to obtain written concurrence from the Service if they determine that their proposed action will not affect listed species or critical habitat, nor do these regulations provide a legal mechanism for the Service to concur with such a determination. Recently, Region 8 has been involved in litigation related to actions for which the action agency requested our concurrence with their "no effect" determination. It is apparent that further clarification is needed on this issue.

Although periodic, interagency coordination on the proper analytical framework for effect determinations is important, given our budget and staffing constraints, it is also imperative that we prioritize our section 7 workload to focus our efforts on those activities that we are legally mandated to complete. If your staff review these requests, even though the section 7 handbook contemplates that the Service may concur on an action agency's "no effect" determination, as a matter of regional policy do not provide concurrence or non-concurrence in writing (including e-mail). You should acknowledge that we have no regulatory or statutory authority for concurring with "no effect" determinations and remind the requester that it is the action agency's responsibility to make effect determinations for compliance with section 7(a)(2).

If an action agency requests technical assistance on an effect determination, you are encouraged to assist insofar as your workload and staffing constraints allow consistent with our priorities. I encourage you to continue using innovative methods for communicating best available information to action agencies to assist them in making well-informed determinations, such as through the posting of species accounts and other guidance on your field office websites.

If you have any questions on this policy, please contact Jana Affonso at 916-414-6593.

cc:
Region 8 ARDs

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Informal Biological Assessment

VB BTS III, LLC
Project Name: US-CA-5363 - Holtville / Trileaf #754155
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Trileaf performed an Informal Biological Assessment for the subject site. The purpose is to document whether the proposed undertaking will affect listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds. A project description, site photographs, topographical maps, wetland maps, and soil maps are included in this report.

Proposed Project Description:
The Site is located at 1934 East Underwood Road, Holtville, Imperial County, California 92250, and consists of the construction of a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. The proposed structure site is approximately 22 feet below mean sea level.

Site and Surrounding Habitat:
The Site is currently located within undeveloped dirt-covered land in a lot surrounded by rural residential development and agricultural land. During the area reconnaissance, no trees along the access road, and generally throughout the area were identified to be removed. The surrounding habitat within a 0.5 mile radius of the proposed site consists predominantly of agricultural and rural residential development. The current habitat is not mapped as critical habitat, nor does it qualify as sufficient habitat for Federal or State listed species.

Wetlands:
Trileaf has reviewed the topographic map, soil composition, as well as the National Wetlands Inventory Map to determine if the proposed lease area and easements would have an impact on any wetlands or require significant amounts of fill or grading. Trileaf determined that the site is not located in a recognized national wetland area.

Trileaf performed a field visit and identified surface water bodies. Using local maps in combination with an area reconnaissance the following no water bodies of concern were observed within 0.5 miles of the proposed project area. Irrigation ditches for agricultural use do neighbor the project area but are not of concern, nor do they pose a concern for the proposed scope of work.

Migratory Birds:
The proposed Site and design process for this project could not conform to all the USFWS recommendations to decrease potential effects on migratory birds. Therefore, it has included mitigating factors such as structure placement within minimally sensitive areas, avoiding placement near wetlands and large water bodies, limiting structure height to 130 feet, and eliminating the need for guy wires. While the proposed Site is located near the Pacific flyway, our site investigation has determined that the project area is not located in an NWI mapped wetland,

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waterway, wildlife refuge, national wilderness area, native grassland or forest area, ridgeline, mountain top, coastline or area commonly known to have high incidences of fog or low clouds, where migratory birds may be found. Based upon the efforts undertaken during this IBA as well as the current data made available, we have concluded that this project will not have a significant effect on migratory birds; however, the presence of migratory birds cannot be ruled out.

Soils:
According to the U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey of Imperial County, California, Imperial Valley Area, the Site is underlain by Imperial-Glenbar silty clay loams complex, 0 to 2 percent slopes. Imperial, Wet soils consist of somewhat poorly drained soils that are formed from alluvium over ancient fluviomarine deposits and are found in flood plains and lake beds. The depth to the most restrictive feature is more than 80 inches, and the depth to the water table is 18 to 36 inches. A typical profile of Imperial, Wet soils consists of a surface layer of silty clay loam extending 0 to 12 inches, followed by two distinct subsurface layers of silty clay, extending 12 to 24 inches and 24 to 60 inches. Imperial, Wet soils have no frequency of flooding or ponding.

Glenbar, Wet soils consist of somewhat poorly drained soils that are formed from alluvium over ancient fluviomarine deposits and are found in flood plains and lake beds. The depth to the most restrictive feature is more than 80 inches, and the depth to the water table is 18 to 36 inches. A typical profile of Imperial, Wet soils consists of a surface layer of silty clay loam extending 0 to 13 inches, followed a layer of clay loam extending 13 to 23 inches, a layer of sandy clay loam extending 23 to 25 inches, and silty clay loam extending 25 to 60 inches. Glenbar, Wet soils have no frequency of flooding or ponding.

Minor components observed on site include Meloland and Holtville, wet. Imperial-Glenbar silty clay loams complex, 0 to 2 percent slopes is not ranked as a hydric soil, and no hydrophytic vegetation or surface water was observed.

Threatened or Endangered Species:
Trileaf has researched the listed or proposed threatened or endangered species and designated critical habitat for the project area. This includes any such species that have been reported to exist within the action area where the project is located. The list of federally threatened or endangered species was acquired through the U.S. Fish and Wildlife Service's Information, Planning, and Consultation system (IPaC) and is site-specific. The state list of threatened or endangered species was acquired from the California Department of Fish and Wildlife: BIOS and is broken down by quadrangle. The lease area is not located within an aquatic environment; therefore any obligate aquatic species should not be directly impacted by this project and are not included in the table below. A list of remaining species and site observations are summarized in the following table:

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US-CA-5363 Holtville
Trileaf# 754155

Species / Resource Name	Federal / State Status	Habitat Description	Recommendation of Effect	Notes / Documentation
Yuma Ridgway's Rail (*Rallus obsoletus yumanensis*)	Federal – Endangered State – Threatened	Habitat includes freshwater marshes, wetlands, and riparian vegetation; preferring areas with shallow open water and dense vegetation.	No effect	Habitat assessment indicated no potential habitat present
Burrowing Owl (*Athene cunicularia*)	State-Candidate Endangered	This species live in open areas with little vegetation, such as grasslands, deserts, and agricultural fields; often nesting in burrows made by other animals, like prairie dogs.	May affect, not likely to adversely affect	Habitat assessment indicated no potential habitat present; no borrows were observed on site.

Conclusions:
Based on the efforts undertaken during our IBA, project specifications and the current data made available, we have concluded that there is no potential for the proposed project to have a significant effect on listed or proposed, threatened and endangered species, their designated critical habitat, or migratory birds.

It should be noted that this informal biological assessment was conducted in accordance with the Scope of Work and does not constitute a Section 7 Biological Assessment under the Endangered Species Act (50 CFR Part 402.01).

Samantha Neary

Samantha Neary
Natural Resource Specialist

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Please refer to Appendix B for Site Maps

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Please refer to Appendix C for Site Photographs

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
Phone: (760) 431-9440 Fax: (760) 431-5901

In Reply Refer To:
Project Code: 2025-0028891
Project Name: US-CA-5363 - Holtville

03/10/2025 23:10:00 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A biological assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

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evaluation similar to a biological assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a biological assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at the Fish and Wildlife Service's Endangered Species Consultation website at:

https://www.fws.gov/service/esa-section-7-consultation

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

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PROJECT SUMMARY

Project Code: 2025-0028891
Project Name: US-CA-5363 - Holtville
Project Type: Communication Tower New Construction
Project Description: Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.8217615,-115.3863801,14z



Counties: Imperial County, California

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ENDANGERED SPECIES ACT SPECIES

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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BIRDS

NAME	STATUS
Yuma Ridgway's Rail *Rallus obsoletus yumanensis*	Endangered

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/3505

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus*	Proposed Threatened

There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/9743

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

PC ORIGINAL PKG

IPAC USER CONTACT INFORMATION

Agency:	Trileaf Corporation
Name:	Samantha Neary
Address:	2121 W. Chandler Blvd.
Address Line 2:	Suite 108
City:	Chandler
State:	AZ
Zip:	85224
Email	s.neary@trileaf.com
Phone:	4808500575

PC ORIGINAL PKG

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
Phone: (760) 431-9440 Fax: (760) 431-5901

In Reply Refer To:
Project Code: 2025-0028891
Project Name: US-CA-5363 - Holtville

12/08/2024 17:56:32 UTC

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A biological assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

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evaluation similar to a biological assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a biological assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found at the Fish and Wildlife Service's Endangered Species Consultation website at:

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The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

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We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Carlsbad Fish And Wildlife Office
2177 Salk Avenue - Suite 250
Carlsbad, CA 92008-7385
(760) 431-9440

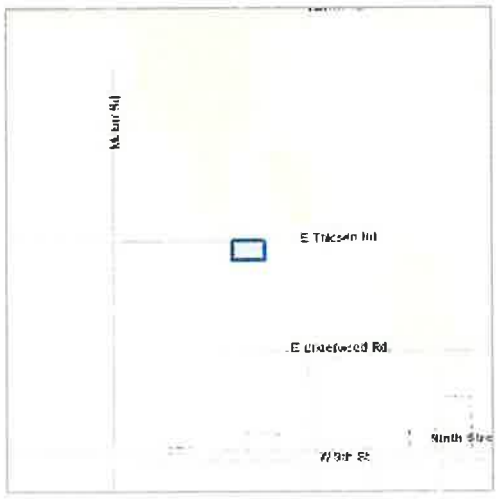
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PROJECT SUMMARY

Project Code: 2025-0028891
Project Name: US-CA-5363 - Holtville
Project Type: Communication Tower New Construction
Project Description: Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@32.8217615,-115.3863801,14z



Counties: Imperial County, California

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ENDANGERED SPECIES ACT SPECIES

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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BIRDS

NAME	STATUS
Yuma Ridgway's Rail *Rallus obsoletus yumanensis*	Endangered

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/3505

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus*	Candidate

No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/9743

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

PC ORIGINAL PKG

IPAC USER CONTACT INFORMATION

Agency:	Trileaf Corporation
Name:	Samantha Neary
Address:	2121 W. Chandler Blvd.
Address Line 2:	Suite 108
City:	Chandler
State:	AZ
Zip:	85224
Email	s.neary@trileaf.com
Phone:	4808500575

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Element_Type	Scientific_Name	Common_Name	Element_Code	Federal_Status	State_Status	CDFW_Status	CA_Rare_Plant_Rank	Quad_Code	Qu
Animals - Amphibians	Incilius alvarius	Sonoran Desert toad	AAABB01010	None	None	SSC	-	3211574	HC WI
Animals - Birds	Buteo regalis	ferruginous hawk	ABNKC19120	None	None	WL	-	3211574	HC WI
Animals - Birds	Circus hudsonius	northern harrier	ABNKC11011	None	None	SSC	-	3211574	HC WI
Animals - Birds	Piranga rubra	summer tanager	ABPBX45030	None	None	SSC	-	3211574	HC WI
Animals - Birds	Charadrius montanus	mountain plover	ABNNB03100	None	None	SSC	-	3211574	HC WI
Animals - Birds	Polioptila melanura	black-tailed gnatcatcher	ABPBJ08030	None	None	WL	-	3211574	HC WI
Animals - Birds	Rallus obsoletus yumanensis	Yuma Ridgways rail	ABNME0501A	Endangered	Threatened	FP	-	3211574	HC WI
Animals - Birds	Athene cunicularia	burrowing owl	ABNSB10010	None	Candidate Endangered	SSC	-	3211574	HC WI
Animals - Insects	Stictiella villegasi	Algodones sand wasp	IIHYM91010	None	None	-	-	3211574	HC WI
Animals - Mammals	Sigmodon hispidus eremicus	Yuma hispid cotton rat	AMAFF07013	None	None	SSC	-	3211574	HC WI
Animals - Mammals	Lasiurus xanthinus	western yellow bat	AMACC05070	None	None	SSC	-	3211574	HC WI
Animals - Reptiles	Phrynosoma mcallii	flat-tailed horned lizard	ARACF12040	None	None	SSC	-	3211574	HC WI
Plants - Vascular	Johnstonella costata	ribbed cryptantha	PDBOR0A0M0	None	None	-	4.3	3211574	HC WI
Plants - Vascular	Pholisma sonorae	sand food	PDLMN02020	None	None	-	1B.2	3211574	HC WI

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TRILEAF

Professional Resume

SAMANTHA NEARY, M.S.

SENIOR PROJECT SCIENTIST

Education

Biology, M.S. / Emphasis in Marine Ecology
San Diego State University / San Diego, CA

Zoology, B.S. / Emphasis in Limnology
University of Wisconsin-Madison / Madison, WI

Areas of Expertise

Ms. Neary has experience performing field visits for National Environmental Policy Act (NEPA) and Section 106 reviews for commercial real estate, lending, and wireless telecommunications projects. This includes characterization of habitats, pre-build surveys for critical species habitats, and migratory bird evaluations. In addition, Ms. Neary has experience overseeing and completing field surveys and biological assessment reports for CEQA analysis.

Environmental service expertise includes:

Phase I/II Environmental Site Assessments
Property Condition Assessments (PCA)
Indoor Air Quality Assessments
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Soil Characterization
Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Mold and Lead-Based Paint Surveys
Local Government Consultation
Land Use History

Certifications/Affiliations

Basic Wetland Delineation Course (2024)
Desert Tortoise Council Introductory Course
OSHA 40-Hour HAZWOPER
Western Society of Naturalists, member since 2016
American Academy of Underwater Scientists, member since 2017
AAUS Certified Scientific Diver
Adult First Aid/CPR/AED/O_2

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Appendix E

Section 106 Review

PC ORIGINAL PKG

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

Dear FCC Applicant:

Section 106 FCC submissions will not be accepted unless this cover sheet is completed and attached.

Project Name US-CA-5363 - Holtville
Project Address 1734 E. Underwood Road, Holtville, CA 92250

Based on the information provided on the accompanying FCC Form 620 or Form 621, and the documentation submitted pursuant to *the First Amendment To The Nationwide Programmatic Agreement For The Collocation Of Wireless Antennas,* the following information applies to this project:

X	There are buildings or structures over 45 years of age within this project's **indirect** area of potential effect (APE).
	There is an archeological site located within this project's direct APE.
	A qualified archeologist has determined that the proposed project area is considered moderately to highly sensitive for archeological resources.

If the above boxes are blank, there are no historic properties within the direct or indirect project area. Therefore, pursuant to Stipulation VII.B.2 of the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission* as quoted below, **your Section 106 responsibilities are complete**:

> If the SHPO/THPO does not provide written notice to the Applicant that it agrees or disagrees with the Applicant's determination of No Historic Properties Affected within 30 days following receipt of a complete Submission Packet, it is deemed that no Historic Properties Exist within the APE or the Undertaking will have no effect on Historic Properties. The Section 106 process is then complete and the Applicant may proceed with the project, unless further processing for reasons other than Section 106 is required.

_____ Yes, this submission contains an eligibility determination requiring SHPO concurrence.

_____ Yes, this submission contains tribal response.

This project will: Not__X___ Not Adversely____ Adversely____ affect Historic Properties.
The qualified project archeologist acknowledges that a pedestrian survey has been completed, a record search has been conducted at the appropriate California Historic Resources Information Center (IC) and that all submitted information is true.

Archeologist's signature _____ Date 1/7/2025

Please note: This letter pertains only to FCC projects being submitted to the California SHPO for comment.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering

2121 West Chandler Boulevard, Suite 108, Chandler, Arizona 85224 - 480.850.0575 - www.trileaf.com

January 20, 2025

State of California Office of Historic Preservation
Department of Parks and Recreation
Attn: Ms. Julianne Polanco, SHPO
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7000

RE: **VB BTS III, LLC – US-CA-5363 - Holtville – Trileaf Project**
#754155 1734 East Underwood Road, Holtville, California
92250 Imperial County, Holtville West Quadrangle (USGS)
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Polanco,

Trileaf Corporation is in the process of completing a NEPA review at the referenced property. Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. The antenna will be licensed by the Federal Communications Commission (FCC).

In accordance with the *Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission*, dated September 2004, a cultural resource investigation has been conducted. Our investigation includes determining if the site is contained in, on, or within the view shed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places or located in or on an Indian Religious Site.

Summary reports of this investigation, maps, photographs and other information are provided in the attached Form 620. As noted, **there are No Historic Properties in the APE for Direct Effects and No Historic Properties in the APE for Visual Effects** In addition, no archaeological sites or artifacts were encountered during the archaeological survey. Therefore, it is recommended that the proposed undertaking proceed without further archaeological review.

We really appreciate your co-operation in this regard and anticipate your concurrence with these findings. Please call me at (480) 850-0575 or email s.neary@trileaf.com, if you need any additional information or have any questions. Thank you for your assistance.

Sincerely,

Samantha Neary

Samantha Neary
Assistant Project Manager

PC ORIGINAL PKG

FCC Form 620

Notification Date: **7AM EST 01/22/2025**
File Number: **0011414026**

FCC Wireless Telecommunications Bureau
New Tower ("NT") Submission Packet

Approved by OMB
3060 – 1039
See instructions for
public burden estimates

General Information

1) (Select only one) (**NE**) **NE** – New **UA** – Update of Application **WD** – Withdrawal of Application	
2) If this application is for an Update or Withdrawal, enter the file number of the pending application currently on file.	File Number:

Applicant Information

3) FCC Registration Number (FRN): **0035673458**
4) Name: **VB BTS III, LLC**

Contact Name

5) First Name: **Jeannette**	6) MI:	7) Last Name: **Davis**	8) Suffix:
9) Title:			

Contact Information

10) P.O. Box:	**And /Or**	11) Street Address: **750 Park of Commerce Drive**		
12) City: **Boca Raton**			13) State: **FL**	14) Zip Code: **33487**
15) Telephone Number: **(716)580-7000**		16) Fax Number:		
17) E-mail Address: **NEPA.NHPA@thelotisgroup.com**				

Consultant Information

18) FCC Registration Number (FRN): **0011724176**
19) Name: **Duke CRM on behalf of Trileaf Corporation**

Principal Investigator

20) First Name: **Curt**	21) MI:	22) Last Name: **Duke**	23) Suffix:
24) Title: **President/Principal Archaeologist**			

Principal Investigator Contact Information

25) P.O. Box:	**And /Or**	26) Street Address: **18 Technology Drive Suite 103**		
27) City: **Irvine**			28) State: **CA**	29) Zip Code: **92618**
30) Telephone Number: **(480)850-0575**		31) Fax Number:		
32) E-mail Address: **s.neary@trileaf.com**				

PC ORIGINAL PKG

Professional Qualification

33) Does the Principal Investigator satisfy the Secretary of the Interior's Professional Qualification Standards?	(X) Yes ( ) No

34) Areas of Professional Qualification:

(X) Archaeologist

( ) Architectural Historian

( ) Historian

( ) Architect

( ) Other (Specify) _____

Additional Staff

35) Are there other staff involved who meet the Professional Qualification Standards of the Secretary of the Interior?	( ) Yes (X) No

If "YES," complete the following:

36) First Name:	37) MI:	38) Last Name:	39) Suffix:
40) Title:			

41) Areas of Professional Qualification:

( ) Archaeologist

( ) Architectural Historian

( ) Historian

( ) Architect

( ) Other (Specify) _____

PC ORIGINAL PKG

Site Information

Tower Construction Notification System

1) TCNS Notification Number: **288458**

Site Information

2) Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: ( ) Yes (X) No

3) Site Name: **US-CA-5363 - Holtville**

4) Site Address: **1734 East Underwood Road**

5) Detailed Description of Project:

New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.

6) City: **Holtville**	7) State: **CA**	8) Zip Code: **92250**

9) County/Borough/Parish: **IMPERIAL**

10) Nearest Crossroads: **11th Street x Olive Road**

11) **NAD 83** Latitude (DD-MM-SS.S): **32-49-18.3** (X) N or ( ) S

12) **NAD 83** Longitude (DD-MM-SS.S): **115-23-11.0** ( ) E or (X) W

Tower Information

13) Tower height above ground level (include top-mounted attachments such as lightning rods): **39.6** ( ) Feet (X) Meters

14) Tower Type (Select One):

( ) Guyed lattice tower

( ) Self-supporting lattice

(X) Monopole

( ) Other (Describe):

Project Status

15) Current Project Status (Select One):

(X) Construction has not yet commenced

( ) Construction has commenced, but is not completed — Construction commenced on: _____

( ) Construction has been completed — Construction commenced on: _____

Construction completed on: _____

PC ORIGINAL PKG

Determination of Effect

14) Direct Effects (Select One):

(X) No Historic Properties in Area of Potential Effects (APE)

( ) No Effect on Historic Properties in APE

( ) No Adverse Effect on Historic Properties in APE

( ) Adverse Effect on one or more Historic Properties in APE

15) Visual Effects (Select One):

(X) No Historic Properties in Area of Potential Effects (APE)

( ) No Effect on Historic Properties in APE

( ) No Adverse Effect on Historic Properties in APE

( ) Adverse Effect on one or more Historic Properties in APE

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No

2a) Tribes/NHOs contacted through TCNS Notification Number: **288458** Number of Tribes/NHOs: **11**

2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: **0**

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: **Campo Band of Mission Indians**

Contact Name

5) First Name: **Daniel**	6) MI:	7) Last Name: **Tsosie**	8) Suffix:

9) Title: **Cultural Resource Manager**

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:

4) Tribe/NHO Name: **Cocopah Indian Tribe**

Contact Name

5) First Name: **Justin**	6) MI:	7) Last Name: **Brundin**	8) Suffix:

9) Title: **Cultural Resource Manager**

Dates & Response

10) Date Contacted **11/27/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No
2a) Tribes/NHOs contacted through TCNS Notification Number: 288458	Number of Tribes/NHOs: 11
2b) Tribes/NHOs contacted through an alternate system:	Number of Tribes/NHOs: 0

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Eastern Shoshone Tribe**

Contact Name

5) First Name: **Josh**	6) MI:	7) Last Name: **Mann**	8) Suffix:
9) Title: **THPO**			

Dates & Response

10) Date Contacted **11/27/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **La Posta Band of Mission Indians**

Contact Name

5) First Name: **Gwendolyn**	6) MI:	7) Last Name: **Parada**	8) Suffix:
9) Title: **Chairperson**			

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No
2a) Tribes/NHOs contacted through TCNS Notification Number: **288458** Number of Tribes/NHOs: **11**	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: **0**	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Los Coyotes Reservation**

Contact Name

5) First Name: **Shane**	6) MI:	7) Last Name: **Chapparosa**	8) Suffix:
9) Title: **Chairman**			

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Pauma/Yuima Band of Mission Indians**

Contact Name

5) First Name: **Chris**	6) MI:	7) Last Name: **Devers**	8) Suffix:
9) Title: **Cultural Clerk**			

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No
2a) Tribes/NHOs contacted through TCNS Notification Number: 288458 Number of Tribes/NHOs: 11	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: 0	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Quechan Indian Tribe**

Contact Name

5) First Name: **Jill**	6) MI:	7) Last Name: **McCormick**	8) Suffix:
9) Title: **Historic Preservation Officer**			

Dates & Response

10) Date Contacted **11/27/2024** 11) Date Replied **11/27/2024**

( ) No Reply

(X) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **San Pasqual Band of Diegueno Indians**

Contact Name

5) First Name: **Desiree**	6) MI:	7) Last Name: **Morales Witman**	8) Suffix:
9) Title: **THPO**			

Dates & Response

10) Date Contacted **11/27/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No
2a) Tribes/NHOs contacted through TCNS Notification Number: 288458 Number of Tribes/NHOs: 11	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: 0	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Skull Valley Band Goshute**

Contact Name

5) First Name: **Candace**	6) MI:	7) Last Name: **Bear**	8) Suffix:
9) Title: **Chairman**			

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Torres-Martinez Desert Cahuilla Indians**

Contact Name

5) First Name: **Michael**	6) MI:	7) Last Name: **Mirelez**	8) Suffix:
9) Title: **Cultural Resources Coordinator**			

Dates & Response

10) Date Contacted **11/27/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Tribal/NHO Involvement

1) Have Indian Tribes or Native Hawaiian Organizations (NHOs) been identified that may attach religious and cultural significance to historic properties which may be affected by the undertaking within the APEs for direct and visual effects?	(X) Yes ( ) No
2a) Tribes/NHOs contacted through TCNS Notification Number: **288458** Number of Tribes/NHOs: **11**	
2b) Tribes/NHOs contacted through an alternate system: Number of Tribes/NHOs: **0**	

Tribe/NHO Contacted Through TCNS

3) Tribe/NHO FRN:
4) Tribe/NHO Name: **Twenty Nine Palms Band of Mission Indians**

Contact Name

5) First Name: **Christopher**	6) MI: **E**	7) Last Name: **Nicosia**	8) Suffix:
9) Title: **Tribal Historic Preservation Officer**			

Dates & Response

10) Date Contacted **11/28/2024** 11) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Other Tribes/NHOs Contacted

Tribe/NHO Information

1) FCC Registration Number (FRN):
2) Name:

Contact Name

3) First Name:	4) MI:	5) Last Name:	6) Suffix:
7) Title:			

Contact Information

8) P.O. Box:	**And /Or**	9) Street Address:		
10) City:			11) State:	12) Zip Code:
13) Telephone Number:		14) Fax Number:		
15) E-mail Address:				
16) Preferred means of communication: ( ) E-mail ( ) Letter ( ) Both				

Dates & Response

17) Date Contacted _____ 18) Date Replied _____

( ) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

PC ORIGINAL PKG

Historic Properties

Properties Identified

1) Have any historic properties been identified within the APEs for direct and visual effect?	( ) Yes (X) No
2) Has the identification process located archaeological materials that would be directly affected, or sites that are of cultural or religious significance to Tribes/NHOs?	( ) Yes (X) No
3) Are there more than 10 historic properties within the APEs for direct and visual effect? If "Yes", you are required to attach a Cultural Resources Report in lieu of adding the Historic Property below.	( ) Yes (X) No

Historic Property

4) Property Name:
5) SHPO Site Number:

Property Address

6) Street Address:		
7) City:	8) State:	9) Zip Code:
10) County/Borough/Parish:		

Status & Eligibility

11) Is this property listed on the National Register? Source: _____	( ) Yes ( ) No
12) Is this property eligible for listing on the National Register? Source: _____	( ) Yes ( ) No
13) Is this property a National Historic Landmark?	( ) Yes ( ) No

14) Direct Effects (Select One):

( ) No Effect on this Historic Property in APE

( ) No Adverse Effect on this Historic Property in APE

( ) Adverse Effect on this Historic Property in APE

15) Visual Effects (Select One):

( ) No Effect on this Historic Property in APE

( ) No Adverse Effect on this Historic Property in APE

( ) Adverse Effect on this Historic Property in APE

PC ORIGINAL PKG

Local Government Involvement

Local Government Agency

1) FCC Registration Number (FRN):
2) Name: **Imperial County**

Contact Name

3) First Name: **Chuck**	4) MI:	5) Last Name: **Storey**	6) Suffix:
7) Title: **County Clerk**			

Contact Information

8) P.O. Box:	**And /Or**	9) Street Address: **940 W. Main Street Suite 202**		
10) City: **El Centro**			11) State: **CA**	12) Zip Code: **92243**
13) Telephone Number: **(442)265-1076**		14) Fax Number:		
15) E-mail Address: **noemail@noemail.com**				

16) Preferred means of communication:

( ) E-mail

(**X**) Letter

( ) Both

Dates & Response

17) Date Contacted **12/09/2024** 18) Date Replied _____

(**X**) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Additional Information

19) Information on local government's role or interest (optional):

PC ORIGINAL PKG

Other Consulting Parties

Other Consulting Parties Contacted

1) Has any other agency been contacted and invited to become a consulting party?	(X) Yes ( ) No

Consulting Party

2) FCC Registration Number (FRN):
3) Name: **Imperial County Historical Society**

Contact Name

4) First Name: **To Whom**	5) MI:	6) Last Name: **It May Concern**	7) Suffix:
8) Title:			

Contact Information

9) P.O. Box:	And /Or	10) Street Address: **373 E. Aten Road**	
11) City: **Imperial**		12) State: **CA**	13) Zip Code: **92251**
14) Telephone Number: **(760)352-1165**		15) Fax Number:	
16) E-mail Address: **director@pioneermuseum.net**			

17) Preferred means of communication:

(X) E-mail

( ) Letter

( ) Both

Dates & Response

18) Date Contacted **12/09/2024** 19) Date Replied _____

(X) No Reply

( ) Replied/No Interest

( ) Replied/Have Interest

( ) Replied/Other

Additional Information

20) Information on other consulting parties' role or interest (optional):

PC ORIGINAL PKG

Designation of SHPO/THPO

1) Designate the Lead State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) based on the location of the tower.

SHPO/THPO

Name: **California Office of Historic Preservation**

2) You may also designate up to three additional SHPOs/THPOs if the APEs include multiple states. If the APEs include other countries, enter the name of the National Historic Preservation Agency and any state and provincial Historic Preservation Agency.

SHPO/THPO Name: _____

SHPO/THPO Name: _____

SHPO/THPO Name: _____

Certification

I certify that all representations on this FCC Form 620 Submission Packet and the accompanying attachments are true, correct, and complete.

Party Authorized to Sign

First Name: **Samantha**	MI:	Last Name: **Neary**	Suffix:

Signature: **Samantha Neary** Date: **01/20/2025**

FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001) AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

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Attachments :

Type	Description	Date Entered
Resumes/Vitae	Resumes	01/10/2025
Map Documents	Maps	01/10/2025
Tribal/NHO Involvement	NOO	01/10/2025
Local Government Involvement	CLG Letter	01/10/2025
Photographs	Photographs	01/10/2025
State-Specific Forms	SHPO Packet	01/20/2025
State-Specific Forms	SHPO Packet	01/20/2025
Area of Potential Effects	Area of Potential Effects	01/20/2025
Public Involvement	Public Involvement	01/20/2025

PC ORIGINAL PKG

Approved by OMB
3060-1039
See instructions for
Public burden estimates

Attachment 1. Consultant Information

Provide a current copy of the resume or curriculum vitae for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.

A current copy of the resume for the Principal Investigator and any researcher or other person who contributed to, reviewed, or provided significant input into the research, analysis, writing or conclusions presented in this filing.

PC ORIGINAL PKG

DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Curt Duke

President/Principal Archaeologist



Expertise

Cultural Resources Management
California Prehistory
Section 106 Compliance
CEQA Compliance
Native American Consultation

Education

CSU, Fullerton, M.A., Anth, 2006
SDSU, Grad Studies, Anth, 1996-97
UC Santa Cruz, B.A., Anth, 1994

Professional Registrations

RPA, No. 15969
County of Riverside (No. 151)
County of Orange

Professional Memberships

Society for California Archaeology
Society for American Archaeology
Pacific Coast Archaeological Society
Assoc. of Environmental Professionals
Building Industry Association

Professional Experience

President/Principal Archaeologist, DUKE CRM, March 2011 to present
Archaeologist/Principal, LSA Associates, 1997-2011
Archaeological/Paleontological Technician, Various Companies, 1995-97
Archaeological Technician/Teachers Assistant, Cabrillo College, 1994
Anthropological Laboratory Technician, UC Santa Cruz, 1994

Selected Project Experience

Reid/Baldwin Adobe, LA Arboretum, Arcadia, 2019-Present
Veteran Affairs Medical Clinic, Santa Rosa, 2019
Deane Dana Friendship Park, Rancho Palos Verdes, 2019
Makayla Mine Expansion Project, Olancha, 2019
Sweeny Road, Lompoc, 2018
Vantage Point Church, Eastvale, 2016 and 2018
VA West Los Angeles Campus Master Plan, 2017-Present
Avenue S-8 and 40th St. E. Roundabout, Palmdale, 2017-18
SR-110 Improvements, Los Angeles, 2017
Diamond Valley Estates Specific Plan, Hemet, 2017
VA West Los Angeles Campus Hospital Replacement, 2016-Present
Shoemaker Bridge Replacement, Long Beach, 2016-Present
Spruce Goose Hangar, Playa Vista, 2016
Rice Avenue at 5th Street Grade Separation, Oxnard, 2015-Present
Vila Borba, Chino Hills, 2013-Present
Skyridge Residential, Mission Viejo, 2011-Present
Baker Water Treatment Plant, Lake Forest, 2014-2015
VA Clinic, Loma Linda, 2014-Present
Evanston Inn, Pasadena, 2014-2016
Petersen Ranch, Leona Valley, 2013-2014
California Street/Highway 101, Ventura, 2014-Present
6th Street Bridge Replacement, Los Angeles, 2013-Present
I-15/I-215 IC Project, Devore, 2008-10
Colton Crossing Rail-to-Rail Grade Separation, 2008-11
City of LA DPW BOE, On-Call, Cultural/Paleo Services, 2008-11
Mid County Parkway, Riverside County, 2014-10
McSweeny Farms Specific Plan, Hemet, 2004-08
Mesquite Regional Landfill, Coachella Valley, 2006-08
Hacienda at Fairview Valley Specific Plan, Apple Valley2007-08
Majestic Hills Specific Plan, Hesperia, 2006-07
Chuckwalla Solar I Project, Desert Center, 2007-08
Needles Highway Improvement Project, 2004-06
Superstition Solar I Project, Salton Sea, Imperial County, 2008
Muddy Canyon Archaeological Project, Newport Beach, 1997-2001
Temecula 32, Archaeological Phase II Testing, 2007
Mammoth Lakes Parks/Rec and Trail System Master Plan, 2010
24th Street Improvements, City of Bakersfield, 2008-11
California Valley Solar Ranch, San Luis Obispo County, 2009-10
Delano-Alpaugh Water Pipeline, Kern/Tulare Counties, 2006-09
I-15/SR-79 IC Project, Temecula, 2006-10
Westlake Historic Resources Survey, Los Angeles, 2008-09
CETAP, western Riverside County, 1999-2001
Los Coches Creek Elementary School, near Alpine, 2003-06
Oak Valley Specific Plan 1 Amendment, Beaumont, 2004
San Nicolas Island, Naval Base Ventura County, CA, 1997

PC ORIGINAL PKG

DUKE CRM

18 Technology Drive, #103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Morgan Beigle

Archaeologist

Professional Experience: 6 Years
Years with Firm: 2 Years



Expertise

Cultural Resources Management
California Prehistory
Historical Archaeology
Prehistoric Archaeology

Education

California State University, Los Angeles, M.A. Anthropology, 2019
Agnes Scott College, B.A., Anthropology/ Sociology, 2014

Professional Registrations

RPA, No. 18011

Professional Memberships

Society for California Archaeology
Society for American Archaeology

Professional Experience

Ms. Beigle attended Agnes Scott College in Decatur, Georgia where she obtained her BA in 2014 in Anthropology/ Sociology and minored in Classics. During her time there, she studied abroad and traveled throughout Turkey where she visited many archaeological sites. Ms. Beigle attended California State University, Los Angeles where she received her MA in Anthropology, emphasis in California Archaeology in 2019. Her thesis focused on crab and sea urchin remains from a Middle Holocene site on San Nicolas Island, California (CA-SNI-40). She has five years of professional experience as a staff archaeologist where she became a Registered Professional Archaeologist and meets the Secretary of Interior Standards for Principal Investigator. During this time, Ms. Beigle has worked on several cultural resource management projects. This includes projects throughout California in compliance with Section 106 of the National Historic Preservation Act (NHPA) and California Environmental Quality Act (CEQA). She has monitored major infrastructure sites such as Metropolitan Transit Authority and utility projects. Ms. Beigle has monitored sites for private commercial and residential developments projects. While monitoring, she identifies historic and prehistoric resources and is cross trained in paleontology. Additionally, her responsibilities have included the preparation of technical reports (assessment, evaluation, and mitigation), cultural resources management plans, and project coordination.

Selected Project Experience

ICF Metro Division 20, Los Angeles 2019-Ongoing.
Kern River Transmission Line, Kern County, 2021-Ongoing
PCH Pavement Rehabilitation, Malibu, 2021-Ongoing
PCH Signal Improvements, Malibu, 2021-Ongoing
California Street Northbound Offramp/Highway 101, Ventura, 2021
San Marcos Creek Project, San Marcos 2021.
Metro Purple Line Section 3, West Los Angeles 2019-2021.
I-405 Project, Orange County 2020-2021.
ICF Metro Regional Connector, Los Angeles 2017-2021.
Southern California Edison, Los Angeles and Ventura Counties, 2019-2021.
Moorefield French Valley, Murrieta 2020.
Caltrans Collection, Redlands 2019.
Stanton Energy Reliability Center, Stanton 2019.
Southern California Edison Pole Survey, Lake Isabella 2019.
10 West Walnut Morley Construction, Pasadena June 2019.
Survey, Redlands November 2018.
Woolsey Fire, Los Angeles December 2018.
Survey, Nothing July 2018.
Brookfield Residential Nelles Project, Whittier 2018-2020.
Brookfield Kaplan Project North, Ontario 2017-2018.
Brookfield Kaplan Project, Eastvale 2017

PC ORIGINAL PKG

DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Lauren Biltonen
Archaeologist



Professional Experience: 6 Years
Years with DUKECRM: 2 Years

Expertise
Archaeology

Education
Biola University, B.A., Anth., 2019
University of Central Lancashire Field School, 2018

Professional Memberships
Pacific Coast Archaeological Society

Summary of Qualifications
Ms. Biltonen has 6 years of experience in Archaeology lab and field practices. She is proficient in archaeological site excavations in California. Under the Caltrans Programmatic Agreement she qualifies as an archaeological lead surveyor. She has conducted field and laboratory work in both archaeology and paleontology. She has experience in faunal analysis and analysis and excavation of human remains.

Relevant Employment History
Archaeologist/Archaeological/Paleontological Monitor, DUKE CRM, 2021-Present
Field Technician, Heritage Resource Consultants, 2021
Crew Chief, Burial Exhumation, CA-LAN-4894, Heritage Resource Consultants, 2019
Teaching and Research Assistant, Department of Anthropology, Biola University, 2016-2019

Selected Professional Experience
Metro Division 20 Portal Widening, Los Angeles, CA, 2021-Ongoing. Role: Archaeological Monitor. DUKE CRM is under contract to provide cultural resources support for this project. The project is located within the existing Division 20 railyard in Downtown Los Angeles. This project will expand the boundaries of the existing tracks and provide additional service tracks for the new Metro Lines. This work is being conducted in an area original to Los Angeles and therefore is in a high area of sensitivity. Ms. Biltonen conducts archaeological monitoring during construction activities, preparing daily logs, and identifying historical artifacts.

I-105 Express Lanes, Los Angeles, CA, 2023. DUKE CRM is conducting archaeological monitoring for the proposed I-105 Express Lanes Project on Interstate 105, between Wilmington Avenue to Fernwood Avenue along Imperial Highway (Post Mile [PM] R9.8 and R10.9), within the proposed project footprint within the ROW of I-105 and Imperial Highway. Ms. Biltonen conducted archaeological monitoring for drilling activities.

Middle Mile Broadband Network Project, Ventura County, CA, 2022. Working with Caltrans District 7, DUKE CRM conducted combination pedestrian and windshield cultural resources Phase I survey of seven (7) state routes in Ventura County (Routes 23, 33, 34, 101, 118, 126 and 150) encompassing approximately 123 miles. Survey was followed by extended Phase I subsurface investigation at 27 locations along the routes deemed culturally sensitive as a result of background research and survey. Ms. Biltonen conducted archaeological survey during Phase I and excavation and screening during XPI subsurface investigation. She also assisted with portions of the Extended Phase I report.

PC ORIGINAL PKG

DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Brent Johnson

Historian/Architectural Historian, Principal Investigator



Expertise
Cultural Resources Management
History
Architectural History
Section 106 Compliance
CEQA Compliance

Education
M.A. History, CSU, Fullerton
B.A. History, UC, San Diego

Registrations
ACHP, Section 106 Essentials,
Asbestos Building Inspector, Initial Course DOSH CA-015-05, Certificate 8BII0518150008N6786
Lead Inspector / Risk Assessor, Lead-Related Construction Certificate ID# 31233
CPR, First Aid & AED Certification, Issued 11/12/2015 with Renewal on 11/2017
RF Safety 101 Certification, Issued 12/17/2015
Remote Pilot Certification, 3980697, Issued March 2017
NAUI Certified Scuba Diver, 1992

Training
Riverside County Cultural Sensitivity Training Course, Certificate

Summary of Qualifications
Mr. Johnson is a Secretary of the Interior Qualified Historian who received his B.A. in History from the University of California, San Diego (1991) and his M.A. in History from California State University, Fullerton (1998). His master's thesis was an oral history of the UCI Fertility Clinic Controversy, which was nominated for thesis of the year. Mr. Johnson has more than eight years of professional experience in the environmental industry consisting of Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP FUDS), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), American Recovery and Reinvestment Act Program (ARRA), Historic American Engineering Record (HABS), and Comprehensive Environmental Response and Liability Act (CERCLA) projects. Environmental reviews included analysis of historic properties; architectural historian evaluations using the DPR form set; cultural records searches at regional CHRIS centers; draft preliminary assessments, area of potential effect surveys, tribal consultation, assessment of wetlands, endangered species, floodplains, and HABS/HAER documentation. Between 2004 and 2012 Mr. Johnson has evaluated over 3,000 project sites in Los Angeles, Ventura, Riverside, San Bernardino, San Diego, and Orange Counties.

Selected Project Experience

Manhattan Beach Historic Context Statement (2024)
Mr. Johnson performed the CHRIS SCCIC records search and wrote the architectural section of the historic context statement for the city of Manhattan Beach.

Acton Community Standards District Historic Context Statement (2024)
Mr. Johnson performed the CHRIS SCCIC records search, and wrote the annotated outline, and historic context statement for the citywide evaluation of historic architectural resources for the community of Acton.

Sequoyah School Lower Campus / Caltrans Parcel #46843 (2023)
Mr. Johnson evaluated the parsonage building, designed by noted architect Sylvanus Marston, as well as the nursery school, children's chapel, religious education building designed by Whitney R. Smith & Wayne R Williams, and a Garrett Eckbo landscape for property owner, CalTrans, District 7.

Architectural Historian Evaluation of Angel Stadium, Anaheim CA (2013)
Angel Stadium / Edison International Field of Anaheim was evaluated for National Register eligibility through the Section 106 process prior to the construction of a DAS HUB antenna system by 5 Bars Inside. The evaluation included a cultural records search at the South Central Coastal Information Center and the Anaheim Heritage Reading Room.

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Professional Resume

SAMANTHA NEARY, M.S.

SENIOR PROJECT SCIENTIST

Education

Biology, M.S. / Emphasis in Marine Ecology
San Diego State University / San Diego, CA

Zoology, B.S. / Emphasis in Limnology
University of Wisconsin-Madison / Madison, WI

Areas of Expertise

Ms. Neary has experience performing field visits for National Environmental Policy Act (NEPA) and Section 106 reviews for commercial real estate, lending, and wireless telecommunications projects. This includes characterization of habitats, pre-build surveys for critical species habitats, and migratory bird evaluations. In addition, Ms. Neary has experience overseeing and completing field surveys and biological assessment reports for CEQA analysis.

Environmental service expertise includes:

Phase I/II Environmental Site Assessments
Property Condition Assessments (PCA)
Indoor Air Quality Assessments
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Soil Characterization
Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Mold and Lead-Based Paint Surveys
Local Government Consultation
Land Use History

Certifications/Affiliations

Basic Wetland Delineation Course (2024)
Desert Tortoise Council Introductory Course
OSHA 40-Hour HAZWOPER
Western Society of Naturalists, member since 2016
American Academy of Underwater Scientists, member since 2017
AAUS Certified Scientific Diver
Adult First Aid/CPR/AED/O_2

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3060-1039
See instructions for
Public burden estimates

Attachment 2. Additional Site Information

Describe any additional structures, access roads, utility lines, fences, easements, or other construction planned for the site.

The proposed project would involve construction of an unmanned telecommunications facility in the vacant lot located at 1734 East Underwood Road, Holtville, Imperial County, California 92250.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The construction drawings provided by *VB BTS III, LLC* are included in this attachment.

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Please refer to Appendix A for Site Plans

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Attachment 3. Tribal and NHO Involvement

At an early stage in the planning process, the Nationwide Agreement requires the Applicant to gather information from appropriate Indian Tribes or Native Hawaiian Organizations ("NHOs") to assist in the identification of Historic Properties of religious and cultural significance to them. Describe measures taken to identify Indian tribes and NHOs that may attach religious and cultural significance to Historic Properties that may be affected by the construction within the Areas of Potential Effects ("APE") for direct and visual effects. If such Indian tribes or NHOs were identified, list them and provide a summary of contacts by either the FCC, the Applicant, or the Applicant's representative. Provide copies of relevant documents, including correspondence. If no such Indian tribes or NHOs were identified, please explain.

Trileaf Corporation completed the Tower Construction Notification System (TCNS) on November 26, 2024, and received the notification of interested tribes on November 29, 2024. The attached FCC Notification email lists the Tribes identified through the TCNS process. A second notice will be sent to all interested tribes/organizations, after a period of 30 days and the consultation process will continue per the FCC's guidelines. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

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Michael Romanoski

From: towernotifyinfo@fcc.gov
Sent: Friday, November 29, 2024 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9050881

Categories: Mike

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

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1. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY - jmann@easternshoshone.org - 307-335-2081 - electronic mail
Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandatesexpressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online submittals. Our website address is: https://urldefense.proofpoint.com/v2/url?u=http-3A__www.esthpo.com&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=Ki1SLJ24NUjRFGFSQKvFtgz4lIGU6R8zeMWEvrmB46XvEFu_mnOLMfNvffKSvQyR&s=8h1zkbhpN-tOqnK2V3QfgpN7Z_1aYDRgwM_EJW2Vulo&e=. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where can submit relevant project files for our consultation review.

Your submission should include:
Appropriate SHPO determination or response letter Cultural Resource Report and or Archaeological Survey Report Photographic project site documentation Topographic or Quadrangle Maps Site Plans/Construction Drawings FCC Forms 620 and 621 Lat/Long Coordinates for the proposed project.
Project Coordinator Contact Information

Our 30-day review period will commence once all project details havebeen submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin, sdurgin@easternshoshone.org or by phoneat: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, NewMexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required bythe mandates expressed in 36 CFR 800, EO 13175,and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

2. Cultural Resource Manager Justin Brundin - Cocopah Indian Tribe - County 15th & Avenue G Somerton, AZ - culturalres@cocopah.com; brundinj@cocopah.com - 928-627-4849 - electronic mail
Exclusions: We would like a copy of any GIS files related to the site location and areas of potential impact.

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3. Historic Preservation Officer Jill McCormick - Quechan Indian Tribe - (PO Box: 1899) Yuma, AZ - historicpreservation@quechantribe.com - 760-919-3631 (ext: 0) - electronic mail

4. Chairman Candace Bear - Skull Valley Band Goshute - 407 Skull Valley Rd Skull Valley, UT - candaceb@svgoshutes.com; candaceb@svgoshutes.com - 435-882-4532 - electronic mail and regular mail
Exclusions: Montana And Associates LLC does not contract for Skull Valley Band of Goshute any longer. Thank you.

If the applicant/tower builder receives no response from the Skull Valley Band Goshute within 30 days after notification through TCNS, the Skull Valley Band Goshute has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Skull Valley Band Goshute in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Cultural Resource Manager Daniel Tsosie - Campo Band of Mission Indians - 36190 Church Road Campo, CA - dtsosie@campo-nsn.gov; MarcusCuero@campo-nsn.gov - 619-760-6480 - electronic mail and regular mail

6. Chairperson Gwendolyn Parada - La Posta Band of Mission Indians - 8 Crestwood Road Boulevard, CA - lp13boots@aol.com - 619-478-2113 - electronic mail and regular mail

7. Chairman Shane Chapparosa - Los Coyotes Reservation - (PO Box: 189) Warner Springs, CA - los_coyotes@ymail.com; loscoyotes_ta@yahoo.com - 760-782-0711 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Los Coyotes Reservation within 30 days after notification through TCNS, the Los Coyotes Reservation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Los Coyotes Reservation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

8. Cultural Clerk Chris Devers - Pauma/Yuima Band of Mission Indians - (PO Box: 369) Pauma Valley, CA - cultural@pauma-nsn.gov - 760-742-1289 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Pauma/Yuima Band of Mission Indians within 30 days after notification through TCNS, the Pauma/Yuima Band of Mission Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

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however, must immediately notify the Pauma/Yuima Band of Mission Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

9. THPO Desiree Morales Witman - San Pasqual Band of Diegueno Indians - (PO Box: 365) Valley Center, CA - thpo@sanpasqualtribe.org; angelinag@sanpasqualtribe.org - 760-749-3200 - electronic mail

If the applicant/tower builder receives no response from the San Pasqual Band of Diegueno Indians within 30 days after notification through TCNS, the San Pasqual Band of Diegueno Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the San Pasqual Band of Diegueno Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

10. Cultural Resources Coordinator Michael Mirelez - Torres-Martinez Desert Cahuilla Indians - (PO Box: 1160) Thermal, CA - mmirelez@tmtanf.org - 760-397-0300 (ext: 1213) - electronic mail

11. Tribal Historic Preservation Officer Christopher E Nicosia - Twenty Nine Palms Band of Mission Indians - 46-200 Harrison Place Coachella, CA - TNPConsultation@29palmsbomi-nsn.gov; Christopher.Nicosia@29palmsbomi-nsn.gov - 760-775-3259 (ext: 6762) - electronic mail and regular mail
Exclusions: Anthony Madrigal, Jr., Tribal Historic Preservation Officer TNPConsultation@29palmsbomi-nsn.gov.
Please call (760) 863-2489, if you have any questions.

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

None

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please

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contact the FCC by emailing tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/26/2024
Notification ID: 288458
Excluded from SHPO Review: No
Tower Owner Individual or Entity Name: VB BTS III LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 49 min 18.3 sec N
Longitude: 115 deg 23 min 11.0 sec W
Location Description: 1734 East Underwood Road
City: Holtville
State: CALIFORNIA
County: IMPERIAL
Detailed Description of Project: New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.
Ground Elevation: -6.7 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 39.6 meters above ground level
Overall Height AMSL: 32.9 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=Ki1SLJ24NUjRFGFSQKvFtgz4lIGU6R8zeMWEvrmB46XvEFu_mnOLMfNvffKSvQyR&s=VtMpMcaJuvnLsGYdsG_bT7FGLht2dCeqXkjfRy03d88&e=

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

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Public burden estimates

Attachment 4. Local Government

a. **If any local government has been contacted and invited to become a consulting party pursuant to Section V.A. of the Nationwide Programmatic Agreement, list the local government agencies contacted. Provide a summary of contacts and copies of any relevant documents (e.g., correspondence or notices).**

On December 9, 2024, Mr. Chuck Storey, County Clerk-Recorder at Imperial County was notified of the proposed project and has been invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether he is interested in consulting further on the proposed project. As of the date of this submission packet, no comments from Mr. Storey have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet. A copy of Trileaf Corporation's correspondence with Mr. Storey is attached.

b. **If a local government agency will be contacted but has not been to date, explain why and when such contact will take place.**

N/A

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TRILEAF
environmental architecture engineering
2121 West Chandler Boulevard, Suite 108, Chandler, Arizona 85224 - 480.850.0575 - www.trileaf.com

December 9, 2024

Imperial County
Attn: Mr. Chuck Storey, County Clerk-Recorder
940 W. Main Street, Suite 202
El Centro, California 92243
Phone: (442) 265-1076

RE: **VB BTS III, LLC – US-CA-5363 - Holtville – Trileaf Project #754155**
1734 East Underwood Road, Holtville, California 92250
Imperial County, Holtville West Quadrangle (USGS)
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Storey:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (480) 850-0575 or email s.neary@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Samantha Neary

Samantha Neary
Senior Project Scientist

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Public burden estimates

Attachment 5. Public Involvement

Attached, please find a copy of a legal notice regarding the proposed telecommunications tower construction that was posted in the *Holtville Tribune* on December 19, 2024. As of the date of this submission packet, no comments regarding this notice have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet.

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Affidavit of Publication

State of California
County of Imperial
City of El Centro

Rosa E Nogueda

being first duly sworn, deposes and says:

That he/she is a citizen of the United States, over twenty-one years of age; that he/she is and was, at all times herein mentioned, the business manager of the Holtville Tribune, Imperial Valley Weekly/Calexico Chronicle, a newspaper of general circulation published in the City of El Centro and circulated at least once a week in Imperial County, State of California,

And That The
Gov't Public Notice

CNS-3878069

1734 East Underwood Road - Holtville, CA 92250

Of which the annexed is a true printed copy, was published in said newspaper according to Gov't Code publication section 6062

1

issues, and on the following days, to wit:

December 19, 2024

and in the regular and entire issue of said newspaper, and not in any supplement.

PUBLIC NOT ICE

VB BTS III LLC proposes to build a 130-foot-tall monopole communications tower at the approx. vicinity of 1734 East Underwood Road, Holtville, Imperial County, CA 92250 [Lat: 32.821736, Long: -115.386383]. Public comments regarding potential effects from this site on historic properties may be submitted within 30 days from the date of this publication to: Trileaf Corp, Samantha Neary, s.neary@trileaf.com, 2121 W. Chandler Blvd., Ste. 108, Chandler, AZ 85224, 480-850-0575.
12/19/24
CNS-3878069#
HOLTVILLE TRIBUNE
Legal 9234

OFFICE MANAGER

HOLTVILLE TRIBUNE
IMPERIAL VALLEY WEEKLY/
CALEXICO CHRONICLE
1122 W. STATE ST., SUITE E
EL CENTRO, CALIFORNIA 92243

A000006995365

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Public burden estimates

Attachment 6. Additional Consulting Parties

List additional consulting parties that were invited to participate by the Applicant, or independently requested to participate. Provide any relevant correspondence or other documents.

On December 9, 2024, the Imperial County Historical Society was notified of the proposed project and has been invited to comment on the proposed project's potential effect on Historic Properties as well as indicate whether they are interested in consulting further on the proposed project. As of the date of this submission packet, no comments from the Imperial County Historical Society have been received by Trileaf Corporation. Should a response be received, copies will be forwarded to all consulting parties as an addendum to this submission packet. A copy of Trileaf Corporation's correspondence with the Imperial County Historical Society is attached.

Native American Heritage Commission (NAHC) Involvement

Trileaf Corporation requested a Sacred Lands File Search and a list of potentially interested Tribes on January 9, 2025, and has yet to receive the list of tribes. Notifications to the Tribes will be sent once received, and a second notice will be sent to all interested tribes/organizations, after a period of 14 days. Any relevant comments from Tribes received by Trileaf will be forwarded to your office.

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TRILEAF
environmental architecture engineering
2121 West Chandler Boulevard, Suite 108, Chandler, Arizona 85224 - 480.850.0575 - www.trileaf.com

December 9, 2024

Imperial County Historical Society
373 E. Aten Road
Imperial, California 92251
Phone: (760) 352-1165
Email: director@pioneersmuseum.net

RE: **VB BTS III LLC – US-CA-5363 - Holtville – Trileaf Project #754155**
1734 East Underwood Road, Holtville, California 92250
Imperial County, Holtville West Quadrangle (USGS)
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

To Whom It May Concern:

Trileaf Corporation is in the process of completing a NEPA Review at the referenced property. Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. The antenna will be licensed by the Federal Communications Commission (FCC).

Our investigation includes determining if the site is contained in, on or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archaeology, engineering or culture, that is listed, or eligible for listing on the State or National Registers of Historic Places, or located in or on an Indian Religious Site.

Trileaf is requesting information regarding this tower's potential effect on Historic Properties. All information received will be forwarded to the State Historic Preservation Office (SHPO) as part of the Section 106 review process. *Additionally, this invitation to comment is separate from any local planning/zoning process that may apply to this project.*

If you wish to comment or be considered a consulting party, please respond within thirty (30) days of the date of this letter. If a response is not received within thirty (30) days, it will be assumed that you have no objections to this undertaking. A site topography map and aerial photograph are enclosed for your reference.

Please call me at (480) 850-0575 or email s.neary@trileaf.com if you need additional information or have any questions. Thank you for your assistance in this regard.

Sincerely,

Samantha Neary
Senior Project Scientist

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NAHC Tribal Summary Table

Site Name: US-CA-5363 - Holtville - Site ID: US-CA-5365 - Holtville

TCNS: 288458 - Trinet Number: 754155

Tribe	Contact: Mail/Email	1st Contact to Tribe		2nd Contact to Tribe		Final Reply	
		Date	Sent	Date	Sent	Date	Comments
Barona Group of the Capitan Grande - Bunce	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Campo Band of Diegueno Mission Indians - Cuero	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Campo Band of Diegueno Mission Indians - Dyche	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Campo Band of Diegueno Mission Indians - Tsosie	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Cocopah Indian Tribe - Guzman	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Ewiiaapaayp Band of Kumeyaay Indians - Garcia	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Ewiiaapaayp Band of Kumeyaay Indians - Pinto	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Iipay Nation of Santa Ysabel - Linton	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Inaja-Cosmit Band of Indians - Osuna	Mail	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Jamul Indian Village - Cumper	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Jamul Indian Village - Pinto	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
La Posta Band of Diegueno Mission Indians - Parada	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Manzanita Band of Kumeyaay Nation - Santos	Mail	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Mesa Grande Band of Diegueno Mission Indians - Linton	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Quechan Tribe of the Fort Yuma Reservation - Joaquin	Email	1/27/2025	Sent Letter & Project Information			1/27/2025	Historic Preservation Office does not wish to comment on this project.
Quechan Tribe of the Fort Yuma Reservation - McCormick	Email	1/27/2025	Sent Letter & Project Information				
Quechan Tribe of the Fort Yuma Reservation - Scott	Email	1/27/2025	Sent Letter & Project Information				
San Pasqual Band of Diegueno Mission Indians - Flores	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
San Pasqual Band of Diegueno Mission Indians - Lawson	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Sycuan Band of the Kumeyaay Nation - Martinez	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Sycuan Band of the Kumeyaay Nation - Paipa	Email	1/27/2025	Sent Letter & Project Information	2/7/2025	Sent Follow Up		
Viejas Band of Kumeyaay Indians - Pingleton	Email	1/27/2025	Sent Letter & Project Information			1/27/2025	We have determined that the project site has cultural significance or ties to Viejas, and request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments or inadvertent discovery of cultural artifacts.
Viejas Band of Kumeyaay Indians - Teran	Email	1/27/2025	Sent Letter & Project Information				

Native American Heritage Commission
Native American Contact List
Imperial County
1/23/2025

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Barona Group of the Capitan Grande	F	Art Bunce, Attorney		(760) 489-0329		buncelaw@aol.com	Diegueno	Imperial,San Diego	7/25/2023
Campo Band of Diegueno Mission Indians	F	Daniel Tsosie, THPO	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 760-6480		dtsosie@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Campo Band of Diegueno Mission Indians	F	Marcus Cuero, Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		marcuscuero@campo-nsn.gov	Diegueno	Imperial,San Diego	5/15/2024
Campo Band of Diegueno Mission Indians	F	Ben Dyche, Vice Chairperson	36190 Church Road, Suite 1 Campo, CA, 91906	(619) 478-9046		bdyche@campo-nsn.gov	Diegueno	Imperial,San Diego	5/24/2024
Cocopah Indian Tribe	F	Jose Guzman, Cultural Resources Interim Manager	14515 S. Veterans Drive Somerton, AZ, 85350	(928) 722-7523		guzmanj@cocopah.gov	Cocopah	Imperial	4/4/2024
Ewiiaapaayp Band of Kumeyaay Indians	F	Robert Pinto, Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 368-4382	(619) 445-9126	ceo@ebki-nsn.gov	Diegueno	Imperial,San Diego	
Ewiiaapaayp Band of Kumeyaay Indians	F	Michael Garcia, Vice Chairperson	4054 Willows Road Alpine, CA, 91901	(619) 933-2200	(619) 445-9126	michaelg@leaningrock.net	Diegueno	Imperial,San Diego	
Iipay Nation of Santa Ysabel	F	Clint Linton, Director of Cultural Resources	P.O. Box 507 Santa Ysabel, CA, 92070	(760) 803-5694		clint@redtailenvironmental.com	Diegueno	Imperial,San Diego	11/30/2023
Jaja-Cosmit Band of Indians	F	Rebecca Osuna, Chairperson	2005 S. Escondido Blvd. Escondido, CA, 92025	(760) 737-7628	(760) 747-8568		Diegueno	Imperial,San Diego	
Jamul Indian Village	F	Lisa Cumper, Tribal Historic Preservation Officer	P.O. Box 612 Jamul, CA, 91935	(619) 669-4855		lcumper@jiv-nsn.gov	Diegueno	Imperial,San Diego	9/5/2018
Jamul Indian Village	F	Erica Pinto, Chairperson	P.O. Box 612 Jamul, CA, 91935	(619) 669-4785	(619) 669-4817	epinto@jiv-nsn.gov	Diegueno	Imperial,San Diego	
La Posta Band of Diegueno Mission Indians	F	Gwendolyn Parada, Chairperson	8 Crestwood Road Boulevard, CA, 91905	(619) 478-2113	(619) 478-2125	LP13boots@aol.com	Diegueno	Imperial,San Diego	

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Native American Heritage Commission
Native American Contact List
Imperial County
1/23/2025

Manzanita Band of Kumeyaay Nation	F	Angela Elliott Santos, Chairperson	P.O. Box 1302 Boulevard, CA, 91905	(619) 766-4930	(619) 766-4957		Diegueno	Imperial,San Diego	
Mesa Grande Band of Diegueno Mission Indians	F	Michael Linton, Chairperson	P.O Box 270 Santa Ysabel, CA, 92070	(760) 782-3818	(760) 782-9092		Diegueno	Imperial,San Diego	
Quechan Tribe of the Fort Yuma Reservation	F	Manfred Scott, Acting Chairman - Kw'ts'an Cultural Committee	P.O. Box 1899 Yuma, AZ, 85366	(928) 210-8739		culturalcommittee@quechantribe.com	Quechan	Imperial,Kern,Los Angeles,Riverside,San Bernardino,San Diego	5/16/2023
Quechan Tribe of the Fort Yuma Reservation	F	Jordan Joaquin, President, Quechan Tribal Council	P.O.Box 1899 Yuma, AZ, 85366	(760) 919-3600		executivesecretary@quechantribe.com	Quechan	Imperial,Kern,Los Angeles,Riverside,San Bernardino,San Diego	5/16/2023
Quechan Tribe of the Fort Yuma Reservation	F	Jill McCormick, Historic Preservation Officer	P.O. Box 1899 Yuma, AZ, 85366	(928) 261-0254		historicpreservation@quechantribe.com	Quechan	Imperial,Kern,Los Angeles,Riverside,San Bernardino,San Diego	5/16/2023
San Pasqual Band of Diegueno Mission Indians	F	John Flores, Environmental Coordinator	P. O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876	johnf@sanpasqualtribe.org	Diegueno	Imperial,San Diego	8/16/2016
San Pasqual Band of Diegueno Mission Indians	F	Allen Lawson, Chairperson	P.O. Box 365 Valley Center, CA, 92082	(760) 749-3200	(760) 749-3876		Diegueno	Imperial,San Diego	
Sycuan Band of the Kumeyaay Nation	F	Bernice Paipa, Cultural Resource Specialist	Sycuan Cultural Center: 910 Willow Glen Drive El Cajon, CA, 92019	(619) 445-6917		bpaipa2@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Sycuan Band of the Kumeyaay Nation	F	Cody Martinez, Chairman	Sycuan Tribal Office: 1 Kwaaypaay Court El Cajon, CA, 92019	(619) 445-2613		cmartinez@sycuan-nsn.gov	Kumeyaay	Imperial,San Diego	8/7/2023
Viejas Band of Kumeyaay Indians	F	Ray Teran, Resource Management Director	1 Viejas Grade Road Alpine, CA, 91901	(619) 659-2312		rteran@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023
Viejas Band of Kumeyaay Indians	F	Ernest Pingleton, THPO	1 Viejas Grade Road Alpine, CA, 91901	(619) 445-3810		epingleton@viejas-nsn.gov	Kumeyaay	Imperial,San Diego	6/29/2023

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed 754155 - US-CA-5363 - Holtville Project, Imperial County.

Record: PROJ-2025-000395
Report Type: List of Tribes
Counties: Imperial
NAHC Group: All

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Barona Group of the Capitan Grande - Bunce
Mr. Art Bunce

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Bunce:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Campo Band of Diegueno Mission Indians - Cuero
Mr. Marcus Cuero
36190 Church Road
Suite 1
Campo, CA 91906

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Cuero:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Campo Band of Diegueno Mission Indians - Dyche
Vice Chairperson Ben Dyche
36190 Church Road, Suite 1
Campo, CA 91906

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Vice Chairperson Dyche:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Campo Band of Diegueno Mission Indians - Tsosie
THPO Daniel Tsosie
36190 Church Road, Suite 1
Campo, CA 91906

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear THPO Tsosie:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Cocopah Indian Tribe - Guzman
Cultural Resources Interim Manager Jose Guzman
14515 S. Veterans Drive
Somerton, AZ 85350

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Cultural Resources Interim Manager Guzman:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Ewiiaapaayp Band of Kumeyaay Indians - Garcia
Mr. Michael Garcia
4054 Willows Road
Alpine, CA 91901

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Garcia:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Ewiiaapaayp Band of Kumeyaay Indians - Pinto
Mr. Robert Pinto
4054 Willows Road
Alpine, CA 91901

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Pinto:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Iipay Nation of Santa Ysabel - Linton
Mr. Clint Linton
P.O. Box 507
Santa Ysabel, CA 92070

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Linton:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Inaja-Cosmit Band of Indians - Osuna
Ms. Rebecca Osuna
2005 S. Escondido Blvd.
Escondido, CA 92025

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Osuna:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Jamul Indian Village - Cumper
Ms. Lisa Cumper
P.O. Box 612
Jamul, CA 91935

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Cumper:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Jamul Indian Village - Pinto
Ms. Erica Pinto
P.O. Box 612
Jamul, CA 91935

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Pinto:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

La Posta Band of Diegueno Mission Indians - Parada
Ms. Gwendolyn Parada
8 Crestwood Road
Boulevard, CA 91905

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Parada:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Manzanita Band of Kumeyaay Nation - Santos
Ms. Angela Elliott Santos
P.O. Box 1302
Boulevard, CA 91905

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Elliott Santos:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Mesa Grande Band of Diegueno Mission Indians - Linton
Mr. Michael Linton
P.O Box 270
Santa Ysabel, CA 92070

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Linton:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Quechan Tribe of the Fort Yuma Reservation - Joaquin
Mr. Jordan D. Joaquin
P.O.Box 1899
Yuma, AZ 85366

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Joaquin:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

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If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Quechan Tribe of the Fort Yuma Reservation - McCormick
Jill McCormick
P.O. Box 1899
Yuma, AZ 85366

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear McCormick:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

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If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

From: Jill Mccormick
To: Tribal
Subject: Re: [EXTERNAL]:Quechan Tribe of the Fort Yuma Reservation (McCormick) - US-CA-5363 - Holtville- 754155 - NAHC Consultation
Date: Monday, January 27, 2025 4:14:59 PM
Attachments: image001.png
Outlook-tylui1r1.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,
This email is to inform you that the Historic Preservation Office does not wish to comment on this project.
Email correspondence is the preferred method of communication with this office. Hard copies of project letters are not required if an email containing the project documents has been sent to the Historic Preservation Office.

Jill

H. Jill McCormick, M.A.
Historic Preservation Office
Ft. Yuma Quechan Indian Tribe
P.O. Box 1899
Yuma, AZ 85366-1899
Office: 760-919-3631
Cell: 928-920-6521

From: Tribal <tribal@trileaf.com>
Sent: Monday, January 27, 2025 2:42 PM
To: Jill Mccormick <historicpreservation@quechantribe.com>
Subject: [EXTERNAL]:Quechan Tribe of the Fort Yuma Reservation (McCormick) - US-CA-5363 - Holtville- 754155 - NAHC Consultation

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you

PC ORIGINAL PKG

recognize the sender and know the content is safe.

Hello,

Please find attached the topographical map and construction drawings for the above referenced project. Please let me know if you have any questions or concerns.

Thank you!

Michael Romanoski
Tribal Consultation Manager

TRILEAF
environmental architecture engineering

1515 Des Peres Rd, Suite 200
St. Louis, MO 63131
Office: (314) 997-6111, ext. 248
Mobile: (636) 577-5071

This email has been scanned for spam and viruses by Proofpoint Essentials. Click here to report this email as spam.

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environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Quechan Tribe of the Fort Yuma Reservation - Scott
Mr. Manfred Scott
P.O. Box 1899
Yuma, AZ 85366

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Scott:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

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If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

San Pasqual Band of Diegueno Mission Indians - Flores
Mr. John Flores
P.O. Box 365
Valley Center, CA 92082

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Flores:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

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If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

San Pasqual Band of Diegueno Mission Indians - Lawson
Mr. Allen Lawson
P.O. Box 365
Valley Center, CA 92082

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Lawson:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Sycuan Band of the Kumeyaay Nation - Martinez
Mr. Cody Martinez
1 Kwaaypaay Court
El Cajon, CA 92019

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Martinez:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Sycuan Band of the Kumeyaay Nation - Paipa
Ms. Bernice Paipa
Sycuan Cultural Center
910 Willow Glen Drive
El Cajon, CA 92019

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Ms. Paipa:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Viejas Band of Kumeyaay Indians - Pingleton
Mr. Ernest Pingleton
1 Viejas Grade Road
Alpine, CA 91901

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Pingleton:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 27, 2025

Viejas Band of Kumeyaay Indians - Teran
Mr. Ray Teran
1 Viejas Grade Road
Alpine, CA 91901

RE: **NAHC CONSULTATION**
VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

Dear Mr. Teran:

This is an invitation to consult on a proposed development project at locations with which you have tribal cultural affiliation. The purpose of the consultation is to ensure the protection of Native American cultural resources on which the proposed undertaking may have an impact. In the tribal consultation process, early consultation is encouraged in order to provide for full and reasonable public input from Native American Groups and Individuals, as consulting parties, on potential effect of the development project and to avoid costly delays. Further, we understand that much of the content of the consultation will be confidential and will include, but not be limited to, the relationship of proposed project details to Native American Cultural Historic Properties, such as burial sites, known or unknown, architectural features and artifacts, ceremonial sites, sacred shrines, and cultural landscapes.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land. Please see the attached 7.5-minute USGS topographic map for site location within the above referenced quadrangle and construction drawings.

If you know of any cultural resources in the vicinity of this project that may be of religious and/or cultural significance to your tribe, if you require additional information, or if you have questions please call me at (314) 997-6111 or email tribal@trileaf.com. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

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From: Ray Teran
To: Tribal
Cc: Ernest Pingleton
Subject: RE: Viejas Band of Kumeyaay Indians (Teran) - US-CA-5363 - Holtville- 754155 - NAHC Consultation
Date: Monday, January 27, 2025 4:00:10 PM
Attachments: image001.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

If you wish to utilize Viejas cultural monitors (Viejas rate is $54.15/hr. plus GSA mileage), please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

If a Tribe, having a closer proximity to the Project, requests to perform cultural monitoring, Viejas will differ to them.

From: Tribal <tribal@trileaf.com>
Sent: Monday, January 27, 2025 1:45 PM
To: Ray Teran <rteran@viejas-nsn.gov>
Subject: [SUSPICIOUS MESSAGE] Viejas Band of Kumeyaay Indians (Teran) - US-CA-5363 - Holtville-754155 - NAHC Consultation

This Message contains suspicious characteristics and has originated outside your organization.

Hello,

Please find attached the topographical map and construction drawings for the above referenced project. Please let me know if you have any questions or concerns.

Thank you!

Michael Romanoski
Tribal Consultation Manager

TRILEAF
environmental architecture engineering

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1515 Des Peres Rd, Suite 200
St. Louis, MO 63131
Office: (314) 997-6111, ext. 248
Mobile: (636) 577-5071

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Public burden estimates

Attachment 7. Area of Potential Effects

You are required to provide two attachments regarding the Determination of Effect: Areas of Potential Effect and Mitigation of Effect (if applicable).

Areas of Potential Effect Guidelines:

a. **Describe the APE for direct effects and explain how this APE was determined.**
Total acreage of the project area is approximately 0.002 acres. As defined by the NPA, "the APE for direct effects is limited to the area of potential ground disturbance and any property, or any portion thereof that will be physically altered or destroyed by the Undertaking." The APE for direct effects is essentially the archaeological portion of the survey, which is the footprint of the proposed compound and access and utility easement.

b. **Describe the APE for visual effects and explain how this APE was determined.**
The APE for visual effects is the geographic area in which the Project has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a historic property that makes it eligible for listing on the National Register of Historic Places (NRHP). The presumed APE for visual effects for construction of new facilities is the area from which the tower will be visible. Due to the height of the proposed undertaking (130 feet), the presumed APE for visual effects for this project is a 0.5-mile radius from the tower site.

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Attachment 8. Historic Properties Visual Effects

Historic Properties Identified for Visual Effects Guidelines

a. **Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for visual effects that is listed in the National Register, has been formally determined eligible for listing by the Keeper of the National Register, or is identified as considered eligible for listing in the records of the SHPO/THPO, pursuant to Section VI.D.I.a. of the Nationwide Agreement.**

N/A

b. **Provide the name and address (including U.S. Postal Service ZIP Code) of each Historic Property in the APE for visual effects, not listed in part "a", identified through the comments of Indian Tribes, NHOs, local governments, or members of the public. Identify each individual or group whose comments led to the inclusion of a Historic Property in this attachment. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63).**

N/A

c. **For any properties listed in the above Historic Properties list, that the Applicant considers no longer eligible for inclusion in the National Register, explain the basis for this recommendation.**

N/A

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Public burden estimates

Attachment 9. Historic Properties Direct Effects

a. List all properties within the APE for direct effects.

No cultural materials or features were observed on the surface of the direct APE. A finding of No Historic Properties in the APE for Direct Effects is recommended for this project.

b. Provide the name and address (including U.S. Postal Service ZIP Code) of each property in the APE for direct effects, not listed in part "a" (above), that the Applicant considers to be eligible for listing in the National Register as a result of the Applicant's research. For each such property, describe how it satisfies the criteria of eligibility (36 C.F.R. Part 63). For each property that was specifically considered and determined not to be eligible, describe why it does not satisfy the criteria of eligibility.

N/A

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Attachment 9. Continued

c. **Describe the techniques and the methodology, including any field survey, used to identify Historic Properties within the APE for direct effects.[1] If no archeological field survey was performed, provide a report substantiating that: i) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet; or, ii) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth.[2]**

The archaeological investigations were conducted on December 23, 2024, by Ms. Lauren Biltonen, archaeologist at Duke Cultural Resources Management on behalf of Trileaf Corporation. Initially, the APE for direct effects was inspected via pedestrian survey transects spaced about two meters apart. As observed at the time of the field visit, the proposed telecommunications equipment compound is located within an empty lot that has some farming equipment and scrap material. The soil is soft powdery sand with shells from the Salton Sea. The surrounding area consists of rural residential developments and roads that do not appear to be historic in setting. No shovel test probes were excavated to search for subsurface archaeological deposits in the paved project area.

Based on the information gathered, no previously-identified archaeological sites are located within the tower lease area. No artifacts were recovered or any new archaeological resources within the APE for direct effects. Please refer to the Archaeological Survey in attachment 10.

---

[1] Pursuant to Section VI.D.2.a. of the Nationwide Agreement, Applicants shall make a reasonable and good faith effort to identify above ground and archeological Historic Properties, including buildings, structures, and historic districts, that lie within the APE for direct effects. Such reasonable and good faith efforts may include a field survey where appropriate.

[2] Under Section VI.D.2.d. of the Nationwide Agreement, an archeological field survey is required even if none of these conditions applies, if an Indian tribe or NHO provides evidence that supports a high probability of the presence of intact archeological Historic Properties within the APE for direct effects.

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Public burden estimates

Attachment 10. Effects on Identified Properties

Mitigation of Effect Guidelines:

In the case of where an Adverse Visual Effect or Adverse Direct Effect has been determined you must provide the following:

a. **Copies of any correspondence and summaries of any oral communication with the SHPO/THPO and any consulting parties.**
N/A

b. **Describe any alternatives that have been considered that might avoid, minimize, or mitigate any adverse effects. Explain the Applicant's conclusion regarding the feasibility of each alternative.**
N/A

For each property identified as a Historic Property in the online e-106 form:

c. **Indicate whether the Applicant believes the proposed undertaking would have a) no effect; b) no adverse effect; or, c) an adverse effect. Explain how each such assessment was made. Provide supporting documentation where necessary.**

Based on a review of the historic resources, a recommendation of No Historic Properties within the APE for direct effects is recommended. No cultural properties were observed at this location and subsurface archaeological properties are highly unlikely to exist, therefore no further archeological work is recommended.

Based on a review of the historic resources, one (1) historic age building (755 Olive Avenue) was identified within 0.5 miles of the proposed cell tower. This building was determined ineligible for the NRHP by consensus through a Section 106 process. Therefore, a determination of No Historic Properties within the Visual APE is recommended and the project may proceed without further archaeological review.

Please see the attached Cultural Resources Assessment.

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Cultural Resources Assessment

Facility Number: US-CA-5363
Facility Name: Holtville
Tenant Site ID: SD07772

1734 E. Underwood Road
Holtville, CA 92250
Imperial County

Prepared for:

TRILEAF CORPORATION
2121 W. Chandler Blvd., Suite 108
Chandler, AZ 85224

Prepared by:
Brent Johnson, M.A., RPA and Curt Duke M.A., RPA
Duke Cultural Resources Management, LLC
18 Technology Dr
Irvine, California 92618
(949) 356-6660
curt@dukecrm.com
www.dukecrm.com

Duke CRM Contract No.: C-0577

DUKE CRM

January 7, 2025

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INTRODUCTION

Duke Cultural Resources Management, LLC (DUKE C R M) is under contract to TRILEAF Corporation to perform a cultural resources assessment for VB BTS III, LLC, facility US-CA-5363 Holtville, located at 1734 East Underwood Road, Holtville, Imperial County, California. This report has been prepared to comply with Section 106 of the National Historic Preservation Act (NHPA) and 36 CFR Part 800, the regulations implementing the NHPA. The Federal Communications Commission (FCC) is the lead Federal Agency for the purposes of Section 106.

Project Description

Based on the information provided to DUKE C R M by TRILEAF Corporation and VB BTS III, LLC, the proposed action consists of a proposed new telecommunications and public utility facility consisting of a 120' monopole with 12 panel antennas, 12 radio units, one (1) microwave and one (1) GPS antenna on the monopole. Additionally, two (2) ground mounted radio cabinets, one (1) back-up diesel generator, , cable ice bridge, and utility backboard and multi-meter utility service mounted on H-frame on two (2) raised concrete pads within the 40 ft. by40 ft. fenced lease area. Footings, graveled access roads, and trenching for PVC conduits will cause ground disturbance. See Appendix A for Site Plans.

The area of potential effects (APE) for direct effects includes the location of the proposed monopole and equipment cabinets in the proposed ground lease area. The APE for indirect/visual effects is defined as ½ mile for all new towers that are 200 ft. or less in overall height. The overall height of the proposed monopole is 120 ft. Therefore, the APE for visual effects is ½ mile. See Appendix A for photographs of the facility and the surrounding area.

Project Location

The project is located at 1734 East Underwood Road, in the city of Holtville, Imperial County, California (Appendix B). Latitude/longitude coordinates for the project are 32° 49' 18.05" N, 115° 23' 10.40" W (NAD 83). Specifically, the Project is located in Section 26, Township 15 South, Range 15 East, Imperial Valley Baseline and San Bernardino Meridian. The Project is depicted on the USGS *Holtville West, Calif.* 7.5-minute quadrangle (Appendix B).

SETTING

The cultural setting of Imperial County is defined by three categories of cultural resources: prehistoric, ethnographic, and historic. The prehistoric setting covers the era prior to sustained European contact (AD 1770), while the historic setting covers the period subsequent to that contact. The ethnographic setting covers the overlap between the two (2), presenting information regarding the Native American inhabitants of the area, as understood through historical accounts and information given to anthropologists by Native Californians (Aspen 2015).

Paleo-Indian (12,550–8,000 B.P.)- The material culture pattern observed in Imperial County during the Paleoindian Period is often referred to as the San Dieguito Complex, which may have extended through the Early Archaic Period. San Dieguito Complex sites in Imperial County are characterized by a lack of ceramics, lithic assemblages, rock features, and cleared circles (Bard 2002). The San Dieguito Complex is thought to be the material remains of a nonspecialized hunting and gathering society. Extensive evidence of occupation in the Colorado Desert during the San Dieguito period is limited due to the combined result of highly mobile early settlement patterns as well as the instability of landforms in the Salton Basin and Colorado River Valley. The San Dieguito period is

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considered to overlap and/or coincide with several other prominent material culture patterns including the Playa culture, Lake Mohave Complex, Western Pluvial Lakes Tradition, and Western Lithic co-tradition (Schaefer and Laylander 2007)(Chambers Group 2014).

Early Archaic Period (8,000-4,000 years B.P.) The Early Archaic was characterized by a drier climate and shallow, fluctuating lake levels. The Altithermal Period of climate change may have forced the mobile hunter-gatherers into more hospitable regions, resulting in the semi-abandonment of Imperial County. Although examples are rare, archaeological sites from this period are likely to occur in remnant pluvial lake basins, along ancient dry stream channels, and near springs or seeps (Sutton et al. 2007). Early Archaic occupation is generally indicated by stone circles and sparse lithic scatters on desert pavements. The available archaeological evidence suggests very low population densities during this period and forager strategies were practiced. In the Colorado Desert, archaeological sites dating to the Middle Holocene are rare. One such site, the Salton Sea Test Base in Imperial County, contained a cluster of early projectile point types including Lake Mojave, Pinto, and Elko forms (Schaefer and Laylander 2007)(Chambers Group 2014).

Late Archaic (4,000–1,500 B.P.)- The Late Archaic (4,000 to 1,500 years BP) is characterized by the opportunistic exploitation of both large and small animals, with a greater emphasis on milling tool food processing technology to exploit seasonally available seeds and nuts. These archaeological materials are referred to as the Gypsum or Amargosa complexes. The Armargosa Complex sites are represented by features and artifacts that indicate use by diversified hunters and gatherers who adapted to drier and warmer Holocene conditions, specifically at the higher elevations of the Mojave Desert and Great Basin. One important Late Archaic site, located just to the west of Imperial County in Anza-Borrego Desert State Park, is the early component of the Indian Hill rock shelter. A series of 11 rock-lined cache pits and numerous hearths indicate a residential base or temporary camp in which food storage was integral to the hunting and gathering subsistence and settlement strategy (Cleland and Apple 2003; Schaeffer 1994; Schaefer and Laylander 2007). Numerous Elko-eared dart points flaked and milling stone tools, and three burials were also recovered during excavation (Bard 2002)(Chambers Group 2014).

Late Prehistoric Period (1,500-Euopean Contact [AD 1769]) - The period between 1,500 years BP and European contact (AD 1769 in California) is commonly referred to as the Late Prehistoric Period. It was during this period that early forms of the Colorado Desert's modern ethnographic lifeways emerged. A series of dry and wet episodes characterize the climate during this period (Sutton 1996; Weide and Barker 1974). The beginning of this period was a pre-ceramic transitional phase from 1,500 to 1,250 years BP. This was a continuation of the prehistoric Amargosa Complex, with similar subsistence and settlement patterns. Major innovations include the introduction of paddle-and-anvil pottery making around 1,250 years BP and the introduction of floodplain agriculture. Viewed regionally, pottery use in the Late Prehistoric Period of the Colorado Desert can be divided into three periods or material culture patterns (Arnold et al.2002; Love and Dahdul 2002; Waters 1982a, 1982b, 1982c). Patayan I times, about 1250 to 950 BP, witnessed the inception of several ceramic traditions. During Patayan II times, 950 to 500 BP, increased local manufacture and use of pottery occurred. Patayan III, 500 to 240 BP, saw the introduction of "Colorado Buff" pottery and the westerly spread of ceramics to coastal Southern California (Schaefer 1994; Laylander 1995)(Chambers Group 2014).

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Ethnographic

The Project is located in an area traditionally inhabited by Tipai ethnolinguistic group. The Tipai, previously called Diegueño or Kamia, occupied an area that roughly extended from the Pacific Coast at San Diego eastward to the Sand Hills of Imperial County as well as south into modern-day Mexico (Luomala 1978). Their language is one belonging to the Delta–California branch of the Yuman language family Although the Tipai traded primarily among themselves and with the closely linked Ipai to the north, extensive trade routes through their territory expanded their interaction between other coastal groups and as far inland as New Mexico (Pritzker 2000). Winter villages were typically found in sheltered foothills and valleys. Subsistence of the Tipai consisted primarily of seasonal vegetal foods with opportunistic hunting practiced during gathering. Clans in the Imperial Valley also practiced some farming of maize, beans, and tobacco (Pritzker 2000)(Chambers Group 2014).

Regional History

The first significant European settlement of California began during the Spanish Period (1769 to 1821) when 21 missions and four (4) presidios were established between San Diego and Sonoma. Although located primarily along the coast, the missions dominated economic and political life over the greater California region. The purpose of the missions was primarily for political control and forced assimilation of the Native American population into Spanish society and Catholicism, along with economic support to the presidios (Chambers Group 2014).

In the 1700s, due to pressures from other colonizers (Russians, French, British), New Spain decided that a party should be sent north with the idea of founding both military presidios and religious missions in Alta California to secure Spain's hold on its lands. The aim of the party was twofold. The first was the establishment of presidios, which would give Spain a military presence within its lands. The second was the establishment of a chain of missions along the coast slightly inland, with the aim of Christianizing the native population. By converting the native Californians, they could be counted as Spanish subjects, thereby bolstering the colonial population within a relatively short time.

The party was led by Gaspar de Portolá and consisted of two groups: one would take an overland route, and one would go by sea. All parties were to converge on San Diego, which would be the starting point for the chain of Spanish colonies. What became known as the Portolá Expedition set out on March 24, 1769. Portolá, who was very loyal to the crown and understood the gravity of his charge, arrived in what would become San Diego on July 1, 1769. Here, he immediately founded the presidio of San Diego. Leaving one group in the southern part of Alta California, Portolá took a smaller group and began heading north to his ultimate destination of Monterey Bay. Continuing up the coast, Portolá established Monterey Bay as a Spanish possession on June 3, 1770, although it would take two expeditions to accomplish this task (Chambers Group 2014).

Having established the presidios at San Diego and Monterey, Portolá returned to Mexico. During the first four (4) years of Spanish presence in Alta California, Father Junípero Serra, a member of the Portolá expedition and the Catholic leader of the new province, began establishing what would become a chain of 21 coastal missions in California. The first, founded concurrently at San Diego with the presidio, was the launching point for this group. During this time, four additional missions (San Carlos Borromeo de Carmelo, San Antonio de Padua, San Gabriel Arcángel, and San Luis Obispo de Tolosa) were established (Chambers Group 2014).

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The Mexican Period (1821-1848) began with the success of the Mexican Revolution in 1821, but changes to the mission system were slow to follow. When secularization of the missions occurred in the 1830s, the missions' vast land holdings in California were divided into large land grants called ranchos. The Mexican government granted ranchos throughout California to Spanish and Hispanic soldiers and settlers. Even after the decree of secularization was issued in 1833 by the Mexican Congress, missionaries continued to operate a small diocesan church. In 1834, the San Gabriel Mission, including over 16,000 head of cattle, was turned over to the civil administrator (Chambers Group 2014).

In 1848, the Treaty of Guadalupe Hidalgo ended the Mexican American War and marked the Beginning of the American Period (1848 to present). The discovery of gold that same year sparked the 1849 California Gold Rush, bringing thousands of miners and other new immigrants to California from various parts of the United States, most of whom settled in the northern part of the state. For those settlers who chose to come to southern California, much of their economic prosperity was fueled by cattle ranching rather than by gold. This prosperity, however, came to a halt in the 1860s because of severe floods and droughts, as well as legal disputes over land boundaries, which put many ranchos into bankruptcy (Chambers Group 2014).

Imperial County was formed in 1907 from a portion of San Diego County known as Imperial Valley and is the newest of California's counties. It is known for being one of California's most prosperous agricultural communities because of its vast canal systems stemming from the Colorado River. The first diversion of the Colorado River was in 1905 and continued through 1942 when the All-American Canal was completed. It is this water, conveyed from the Colorado River, which makes Imperial County so rich (Chambers Group 2014).

History of Holtville

Holton was founded in 1903 by W.F. Holt, who sought to establish a hydroelectric power station on the east bank of the Alamo River, where a 40 ft. drop was sufficient to drive an electric dynamo. The simultaneous development of the townsite of Holton, with its business district and plaza, was punctuated by the opening of its first US post office in 1904 and the construction of an Interurban Rail Line to give the town access to the Southern Pacific network at its flag station in Cabaker (El Centro). By 1908, the budding community had a hotel, a newspaper (Tribune), a library, and its own creamery. The city incorporated on July 1, 1908, and the Dixie Overland Highway was later routed through the city in 1914, followed in 1917 by the connection of the rail line from Holtsville to Calipatria. Holtsville would remain a key gateway to the Imperial Valley until 1969 when the city was bypassed by Interstate 8 (Holtville 2024).

METHODS

Research

DUKE CRM conducted a records search for cultural resources (archaeological and historical) at the South Coastal Information Center (SCIC), located at San Diego State University. This included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources surveys and excavation reports generated from projects located within ½ mile of the proposed project. In addition, a review was conducted of the Built Environment Resources Directory (BERD), which includes the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks, and California Points of Historical Interest.

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Field Survey
A pedestrian field survey was conducted of the project APE for direct effects on December 23, 2024.

Personnel
The records search was completed by Morgan Beigle, Master of Arts (M.A.), Registered Professional Archaeologist (RPA), Archaeologist at DUKE CRM. The field survey was completed by Lauren Biltonen, Bachelor of Arts (B.A.), Archaeologist at DUKE CRM. Portions of this report were prepared by Brent Johnson, M.A., Architectural Historian at DUKE CRM. Curt Duke, M.A., RPA, supervised and reviewed these work efforts. Mr. Duke is the Principal Archaeologist of DUKE CRM. Mr. Duke meets the professional qualifications of the Secretary of the Interior for prehistoric and historical archaeology and has 27 years of experience. Mr. Duke is an RPA who has worked in all phases of archaeology (archival research, field survey, testing and data recovery excavation, laboratory analysis, and construction monitoring). Please see Appendix C for Mr. resumes.

RESULTS
Research
The records search was completed on December 16, 2024. The records search did not identify historic resources within ½ mile of Project. A review of the BERD shows there is one (1) historic age building (755 Olive Avenue) within a ½ mile radius. This property was determined ineligible for the NRHP by consensus through a Section 106 process and was not evaluated for the CR or local listing (status code 6Y). The property at 755 Olive Avenue is located approximately 2,122 ft. south of the subject property. Additionally, the SCIC did not identify any cultural resource studies within the Project area or the ½ miles radius. A review of the BERD also indicates that the proposed property located at 1734 East Underwood Road has not been previously evaluated for the NRHP. The BERD was accessed December 31, 2024.

Field Survey
A field survey was conducted of the Project's direct APE. No cultural resources were observed within, or adjacent to, the direct APE. The proposed telecommunications equipment compound is located within an empty lot that has some farming equipment and scrap material. The soil is soft powdery sand with shells from the Salton Sea. The surrounding area consists of rural residential developments and roads that do not appear to be historic in setting. Photographs of the facility and surrounding area are included in Appendix A.

IMPACTS ASSESSMENT
The records search did not identify any cultural resources within the direct APE for VB BTS III, LLC facility US-CA-5363/Holtville, located at 1734 East Underwood Road. The record search did identify one (1) historic building located approximately 2,122 ft. south of the Project. No historic resources were discovered in the direct or indirect APE, and no cultural resources reports were performed within the project area. Given the fact that there are no recorded resources within the proposed location, the area contains tall utility poles and trees and therefore will not be distinctly noticeable from the surrounding area, there is low potential to impact cultural resources within the direct or indirect APE.

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US-CA-5363 Holtville will not have any direct or indirect impacts to any recorded historic properties. This leads to the finding of *no historic properties affected* for facility US-CA-5363. No recommendations are made for further cultural resource efforts. If the project description changes additional studies may be warranted.

In the event that remnants from an archaeological site are discovered during ground disturbing activities, all work shall halt temporarily until a qualified archaeologist can be retained by the project proponent to assess the significance of the find. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of the origin and disposition of the remains pursuant to State Public Resources Code Section 5097.98. The County Coroner must be notified immediately.

CERTIFICATION: I hereby certify that the statements furnished above and in the attached exhibits are accurate, true, and correct to the best of my knowledge and belief.

DATE: January 7, 2025 **SIGNED:** _____

PRINTED NAME: Curt D. Duke

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REFERENCES

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2004 "The Archaeology of California." *Journal of Archaeological Research* 12 (1): 1–73.

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2015 Baseline Environmental Inventory Report - Imperial County Conservation and Open Space Element Update. Imperial County Planning and Development Services Department, El Centro CA.

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1993 Final Program Environmental Impact Report for the County of Imperial General Plan.

Brian F. Mooney Associates
2014 Renewable Energy and Transmission Element Update, Baseline Environmental Inventory Report for the County of Imperial, Chambers Group.

Bureau of Land Management, California Energy Commission, California Department of Fish and Wildlife, and US Fish and Wildlife Service
2014 Draft Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.

Chambers Group
2014 Archaeological and Paleontological Assessment Report for the Brawley Solar Project, Imperial County, California.

Cleland, James H., and Rebecca McCorkle Apple
2003 *A View Across the Cultural Landscape of the Lower Colorado Desert.*

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2000 A Native American Encyclopedia: History, Culture, and Peoples. Oxford, UK: Oxford University Press.

Schaefer, Jerry, and Don Laylander
2007 The Colorado Desert: Ancient Adaptations to Wetlands and Wastelands. In *California Prehistory, Colonization, Culture, and Complexity*, Terry L. Jones, and Kathryn A. Klar, eds, pp. 247–257. Lanham, Md.: Altamira Press.

Sutton et al. (Sutton, Mark Q., Mark E. Basgall, Jill K. Gardner, and Mark W. Allen).
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Appendix A

Site Plans and Photographs

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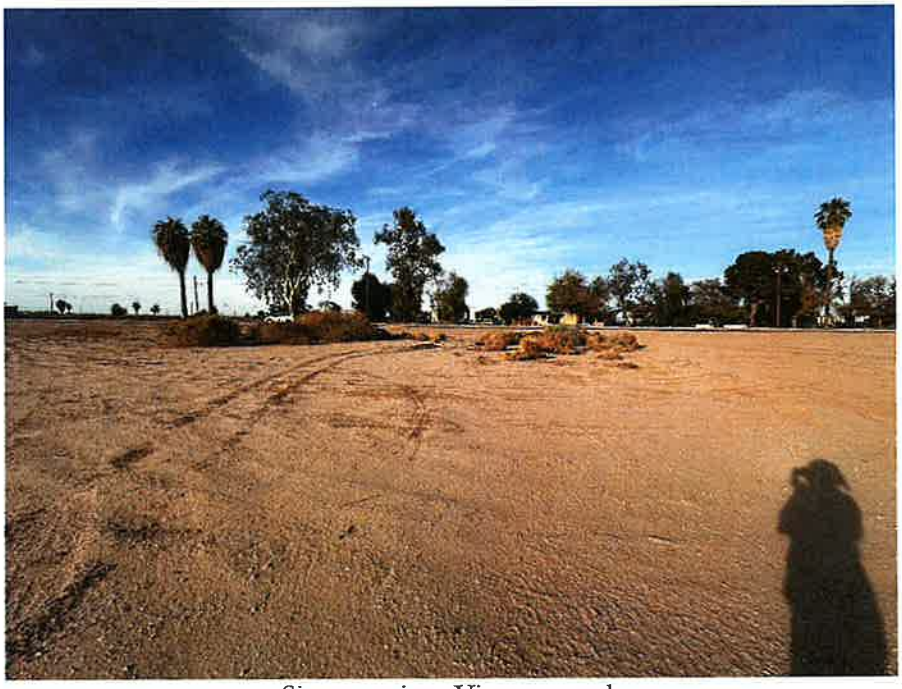


Site overview. View to south.



Site overview. View to east.

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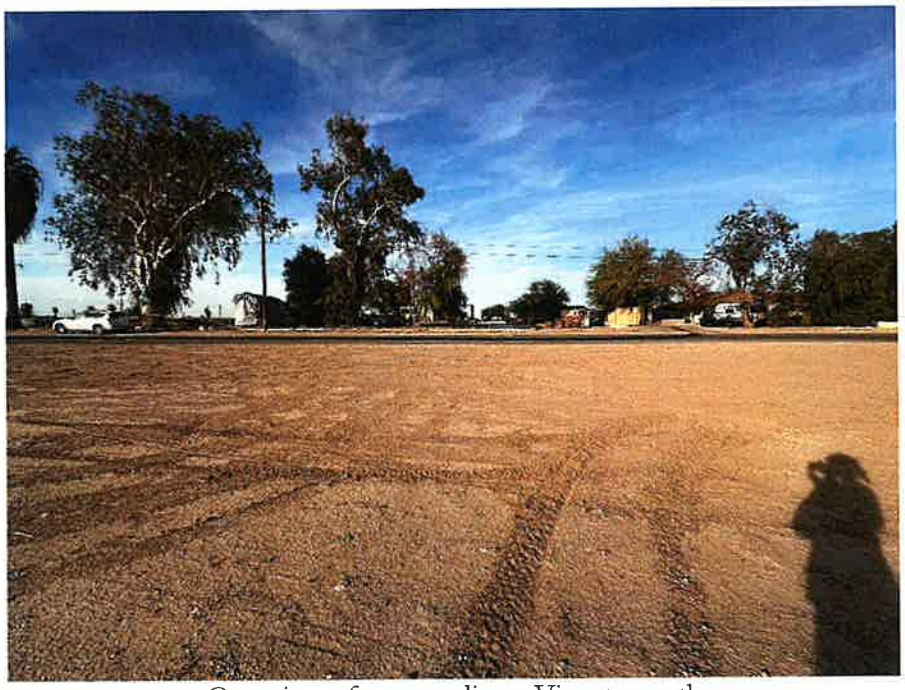


Site overview. View to north



Site overview. View to west

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Overview of surroundings. View to north



Overview of surroundings. View to east.

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Overview of surroundings. View to south.



Overview of surroundings. View to west.

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Appendix B

Maps

1- USGS 7.5' Quadrangle
2- Street Map & Aerial Photograph

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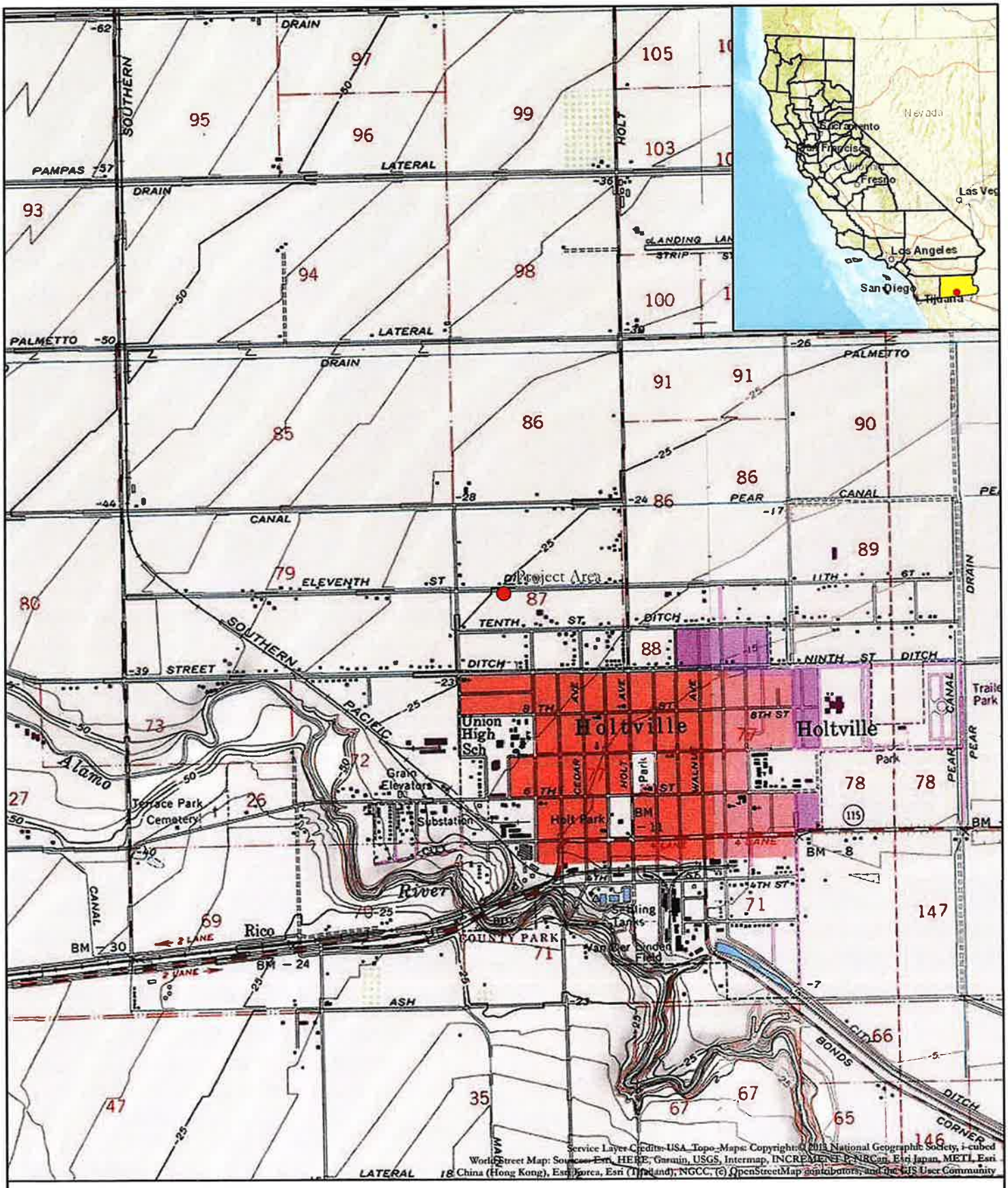


Figure 1. Project Location US-CA-5363 Holtville CA (C-0577)
Imperial County, CA

DUKE CRM

Holtville West, Calif USGS 7.5-minute quadrangle
T15S, R15E, Section 26
Date of Map: 1956/Rev 1979

Project Area

0 .25 .5 Miles
0 .25 .5 Kilometers
1:24,000

N

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Figure 2. Project Aerial Photo
US-CA-5363 Holtville CA (C-0577)
Imperial County, CA

DUKE CRM

Project Area

0 200 400 Feet
1:5,000
N

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Appendix C

Resume

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DUKE CRM

18 Technology Drive, #103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Morgan Beigle

Archaeologist

Professional Experience: 6 Years
Years with Firm: 2 Years



Expertise

Cultural Resources Management
California Prehistory
Historical Archaeology
Prehistoric Archaeology

Education

California State University, Los Angeles, M.A. Anthropology, 2019
Agnes Scott College, B.A., Anthropology/ Sociology, 2014

Professional Registrations

RPA, No. 18011

Professional Memberships

Society for California Archaeology
Society for American Archaeology

Professional Experience

Ms. Beigle attended Agnes Scott College in Decatur, Georgia where she obtained her BA in 2014 in Anthropology/ Sociology and minored in Classics. During her time there, she studied abroad and traveled throughout Turkey where she visited many archaeological sites. Ms. Beigle attended California State University, Los Angeles where she received her MA in Anthropology, emphasis in California Archaeology in 2019. Her thesis focused on crab and sea urchin remains from a Middle Holocene site on San Nicolas Island, California (CA-SNI-40). She has five years of professional experience as a staff archaeologist where she became a Registered Professional Archaeologist and meets the Secretary of Interior Standards for Principal Investigator. During this time, Ms. Beigle has worked on several cultural resource management projects. This includes projects throughout California in compliance with Section 106 of the National Historic Preservation Act (NHPA) and California Environmental Quality Act (CEQA). She has monitored major infrastructure sites such as Metropolitan Transit Authority and utility projects. Ms. Beigle has monitored sites for private commercial and residential developments projects. While monitoring, she identifies historic and prehistoric resources and is cross trained in paleontology. Additionally, her responsibilities have included the preparation of technical reports (assessment, evaluation, and mitigation), cultural resources management plans, and project coordination.

Selected Project Experience

ICF Metro Division 20, Los Angeles 2019-Ongoing.
Kern River Transmission Line, Kern County, 2021-Ongoing
PCH Pavement Rehabilitation, Malibu, 2021-Ongoing
PCH Signal Improvements, Malibu, 2021-Ongoing
California Street Northbound Offramp/Highway 101, Ventura, 2021
San Marcos Creek Project, San Marcos 2021.
Metro Purple Line Section 3, West Los Angeles 2019-2021.
I-405 Project, Orange County 2020-2021.
ICF Metro Regional Connector, Los Angeles 2017-2021.
Southern California Edison, Los Angeles and Ventura Counties, 2019-2021.
Moorefield French Valley, Murrieta 2020.
Caltrans Collection, Redlands 2019.
Stanton Energy Reliability Center, Stanton 2019.
Southern California Edison Pole Survey, Lake Isabella 2019.
10 West Walnut Morley Construction, Pasadena June 2019.
Survey, Redlands November 2018.
Woolsey Fire, Los Angeles December 2018.
Survey, Nothing July 2018.
Brookfield Residential Nelles Project, Whittier 2018-2020.
Brookfield Kaplan Project North, Ontario 2017-2018.
Brookfield Kaplan Project, Eastvale 2017

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DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Lauren Biltonen
Archaeologist



Professional Experience: 6 Years
Years with DUKECRM: 2 Years

Expertise
Archaeology

Education
Biola University, B.A., Anth., 2019
University of Central Lancashire Field School, 2018

Professional Memberships
Pacific Coast Archaeological Society

Summary of Qualifications
Ms. Biltonen has 6 years of experience in Archaeology lab and field practices. She is proficient in archaeological site excavations in California. Under the Caltrans Programmatic Agreement she qualifies as an archaeological lead surveyor. She has conducted field and laboratory work in both archaeology and paleontology. She has experience in faunal analysis and analysis and excavation of human remains.

Relevant Employment History
Archaeologist/Archaeological/Paleontological Monitor, DUKE CRM, 2021-Present
Field Technician, Heritage Resource Consultants, 2021
Crew Chief, Burial Exhumation, CA-LAN-4894, Heritage Resource Consultants, 2019
Teaching and Research Assistant, Department of Anthropology, Biola University, 2016-2019

Selected Professional Experience
Metro Division 20 Portal Widening, Los Angeles, CA, 2021-Ongoing. Role: Archaeological Monitor. DUKE CRM is under contract to provide cultural resources support for this project. The project is located within the existing Division 20 railyard in Downtown Los Angeles. This project will expand the boundaries of the existing tracks and provide additional service tracks for the new Metro Lines. This work is being conducted in an area original to Los Angeles and therefore is in a high area of sensitivity. Ms. Biltonen conducts archaeological monitoring during construction activities, preparing daily logs, and identifying historical artifacts.

I-105 Express Lanes, Los Angeles, CA, 2023. DUKE CRM is conducting archaeological monitoring for the proposed I-105 Express Lanes Project on Interstate 105, between Wilmington Avenue to Fernwood Avenue along Imperial Highway (Post Mile [PM] R9.8 and R10.9), within the proposed project footprint within the ROW of I-105 and Imperial Highway. Ms. Biltonen conducted archaeological monitoring for drilling activities.

Middle Mile Broadband Network Project, Ventura County, CA, 2022. Working with Caltrans District 7, DUKE CRM conducted combination pedestrian and windshield cultural resources Phase I survey of seven (7) state routes in Ventura County (Routes 23, 33, 34, 101, 118, 126 and 150) encompassing approximately 123 miles. Survey was followed by extended Phase I subsurface investigation at 27 locations along the routes deemed culturally sensitive as a result of background research and survey. Ms. Biltonen conducted archaeological survey during Phase I and excavation and screening during XPI subsurface investigation. She also assisted with portions of the Extended Phase I report.

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DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Brent Johnson

Historian/Architectural Historian, Principal Investigator



Expertise
Cultural Resources Management
History
Architectural History
Section 106 Compliance
CEQA Compliance

Education
M.A. History, CSU, Fullerton
B.A. History, UC, San Diego

Registrations
ACHP, Section 106 Essentials,
Asbestos Building Inspector, Initial Course DOSH CA-015-05, Certificate 8BII0518150008N6786
Lead Inspector / Risk Assessor, Lead-Related Construction Certificate ID# 31233
CPR, First Aid & AED Certification, Issued 11/12/2015 with Renewal on 11/2017
RF Safety 101 Certification, Issued 12/17/2015
Remote Pilot Certification, 3980697, Issued March 2017
NAUI Certified Scuba Diver, 1992

Training
Riverside County Cultural Sensitivity Training Course, Certificate

Summary of Qualifications

Mr. Johnson is a Secretary of the Interior Qualified Historian who received his B.A. in History from the University of California, San Diego (1991) and his M.A. in History from California State University, Fullerton (1998). His master's thesis was an oral history of the UCI Fertility Clinic Controversy, which was nominated for thesis of the year. Mr. Johnson has more than eight years of professional experience in the environmental industry consisting of Defense Environmental Restoration Program for Formerly Used Defense Sites (DERP FUDS), National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), American Recovery and Reinvestment Act Program (ARRA), Historic American Engineering Record (HABS), and Comprehensive Environmental Response and Liability Act (CERCLA) projects. Environmental reviews included analysis of historic properties; architectural historian evaluations using the DPR form set; cultural records searches at regional CHRIS centers; draft preliminary assessments, area of potential effect surveys, tribal consultation, assessment of wetlands, endangered species, floodplains, and HABS/HAER documentation. Between 2004 and 2012 Mr. Johnson has evaluated over 3,000 project sites in Los Angeles, Ventura, Riverside, San Bernardino, San Diego, and Orange Counties.

Selected Project Experience

Manhattan Beach Historic Context Statement (2024)
Mr. Johnson performed the CHRIS SCCIC records search and wrote the architectural section of the historic context statement for the city of Manhattan Beach.

Acton Community Standards District Historic Context Statement (2024)
Mr. Johnson performed the CHRIS SCCIC records search, and wrote the annotated outline, and historic context statement for the citywide evaluation of historic architectural resources for the community of Acton.

Sequoyah School Lower Campus / Caltrans Parcel #46843 (2023)
Mr. Johnson evaluated the parsonage building, designed by noted architect Sylvanus Marston, as well as the nursery school, children's chapel, religious education building designed by Whitney R. Smith & Wayne R Williams, and a Garrett Eckbo landscape for property owner, CalTrans, District 7.

Architectural Historian Evaluation of Angel Stadium, Anaheim CA (2013)
Angel Stadium / Edison International Field of Anaheim was evaluated for National Register eligibility through the Section 106 process prior to the construction of a DAS HUB antenna system by 5 Bars Inside. The evaluation included a cultural records search at the South Central Coastal Information Center and the Anaheim Heritage Reading Room.

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DUKE CRM

18 Technology Dr., Ste. 103
Irvine, CA 92618
949-356-6660
www.dukecrm.com

Curt Duke

President/Principal Archaeologist



Expertise

Cultural Resources Management
California Prehistory
Section 106 Compliance
CEQA Compliance
Native American Consultation

Education

CSU, Fullerton, M.A., Anth, 2006
SDSU, Grad Studies, Anth, 1996-97
UC Santa Cruz, B.A., Anth, 1994

Professional Registrations

RPA, No. 15969
County of Riverside (No. 151)
County of Orange

Professional Memberships

Society for California Archaeology
Society for American Archaeology
Pacific Coast Archaeological Society
Assoc. of Environmental Professionals
Building Industry Association

Professional Experience

President/Principal Archaeologist, DUKE CRM, March 2011 to present
Archaeologist/Principal, LSA Associates, 1997-2011
Archaeological/Paleontological Technician, Various Companies, 1995-97
Archaeological Technician/Teachers Assistant, Cabrillo College, 1994
Anthropological Laboratory Technician, UC Santa Cruz, 1994

Selected Project Experience

Reid/Baldwin Adobe, LA Arboretum, Arcadia, 2019-Present
Veteran Affairs Medical Clinic, Santa Rosa, 2019
Deane Dana Friendship Park, Rancho Palos Verdes, 2019
Makayla Mine Expansion Project, Olancha, 2019
Sweeny Road, Lompoc, 2018
Vantage Point Church, Eastvale, 2016 and 2018
VA West Los Angeles Campus Master Plan, 2017-Present
Avenue S-8 and 40th St. E. Roundabout, Palmdale, 2017-18
SR-110 Improvements, Los Angeles, 2017
Diamond Valley Estates Specific Plan, Hemet, 2017
VA West Los Angeles Campus Hospital Replacement, 2016-Present
Shoemaker Bridge Replacement, Long Beach, 2016-Present
Spruce Goose Hangar, Playa Vista, 2016
Rice Avenue at 5th Street Grade Separation, Oxnard, 2015-Present
Vila Borba, Chino Hills, 2013-Present
Skyridge Residential, Mission Viejo, 2011-Present
Baker Water Treatment Plant, Lake Forest, 2014-2015
VA Clinic, Loma Linda, 2014-Present
Evanston Inn, Pasadena, 2014-2016
Petersen Ranch, Leona Valley, 2013-2014
California Street/Highway 101, Ventura, 2014-Present
6th Street Bridge Replacement, Los Angeles, 2013-Present
I-15/I-215 IC Project, Devore, 2008-10
Colton Crossing Rail-to-Rail Grade Separation, 2008-11
City of LA DPW BOE, On-Call, Cultural/Paleo Services, 2008-11
Mid County Parkway, Riverside County, 2014-10
McSweeny Farms Specific Plan, Hemet, 2004-08
Mesquite Regional Landfill, Coachella Valley, 2006-08
Hacienda at Fairview Valley Specific Plan, Apple Valley2007-08
Majestic Hills Specific Plan, Hesperia, 2006-07
Chuckwalla Solar I Project, Desert Center, 2007-08
Needles Highway Improvement Project, 2004-06
Superstition Solar I Project, Salton Sea, Imperial County, 2008
Muddy Canyon Archaeological Project, Newport Beach, 1997-2001
Temecula 32, Archaeological Phase II Testing, 2007
Mammoth Lakes Parks/Rec and Trail System Master Plan, 2010
24th Street Improvements, City of Bakersfield, 2008-11
California Valley Solar Ranch, San Luis Obispo County, 2009-10
Delano-Alpaugh Water Pipeline, Kern/Tulare Counties, 2006-09
I-15/SR-79 IC Project, Temecula, 2006-10
Westlake Historic Resources Survey, Los Angeles, 2008-09
CETAP, western Riverside County, 1999-2001
Los Coches Creek Elementary School, near Alpine, 2003-06
Oak Valley Specific Plan 1 Amendment, Beaumont, 2004
San Nicolas Island, Naval Base Ventura County, CA, 1997

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Approved by OMB
3060-1039
See instructions for
Public burden estimates

Attachment 11. Site Information – Photographs

You are required to provide photographs and maps as part of this filing. Additional site information can be provided in an optional attachment.

Photograph Requirements:

Except in cases where no Historic Properties were identified within the Areas of Potential Effects, submit photographs as described below. Photographs should be in color, marked so as to identify the project, keyed to the relevant map or text, and dated; the focal length of the lens and the height of the camera should be noted. The source of any photograph included but not taken by the Applicant or its consultant (including copies of historic images) should be identified on the photograph.

a. **Photographs taken from the site should show views from the proposed location in all directions. The direction (e.g., north, south, etc.) should be indicated on each photograph, and, as a group, the photographs should present a complete (360 degree) view of the area around the proposed site.**

Please see attached Photographs, which were taken by Lauren Biltonen of Duke Cultural Resources Management on behalf of Trileaf Corporation on December 23, 2024, unless otherwise noted.

b. **Photographs of all listed in and eligible properties within the Areas of Potential Effects.**

N/A

c. **If any listed or eligible properties are visible from the proposed site, photographs looking at the site from each historic property. The approximate distance in feet (meters) between the site and the historic property should be included. If any listed or eligible properties are within the APE, photos looking at each historic property should be included.**

N/A

Aerial photographs were obtained using Google Earth and are dated 2024.

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Please refer to Appendix C for Site Photographs

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Approved by OMB
3060-1039
See instructions for
Public burden estimates

Attachment 12. SHPO Specific Forms

Please see attachments at the front of this submission.

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Approved by OMB
3060-1039
See instructions for
Public burden estimates

Attachment 13. Maps

Include one or more 7.5-minute quad USGS topographical maps that:

a. **Identify the Areas of Potential Effects for both Direct and Visual Effects. If a map is copied from the original, include a key with the name of quad and date.**
b. **Show the location of the proposed site and any access roads or other easements including excavations.**
c. **Show the locations of each property listed.**
d. **Include keys for any symbols, colors, or other identifiers.**
e. **Submit color maps whenever possible.**

The following map has been attached to this report:

Topographic Map (2021)

Project Location Map

Project Aerial Photo

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Please refer to Appendix B for Site Maps

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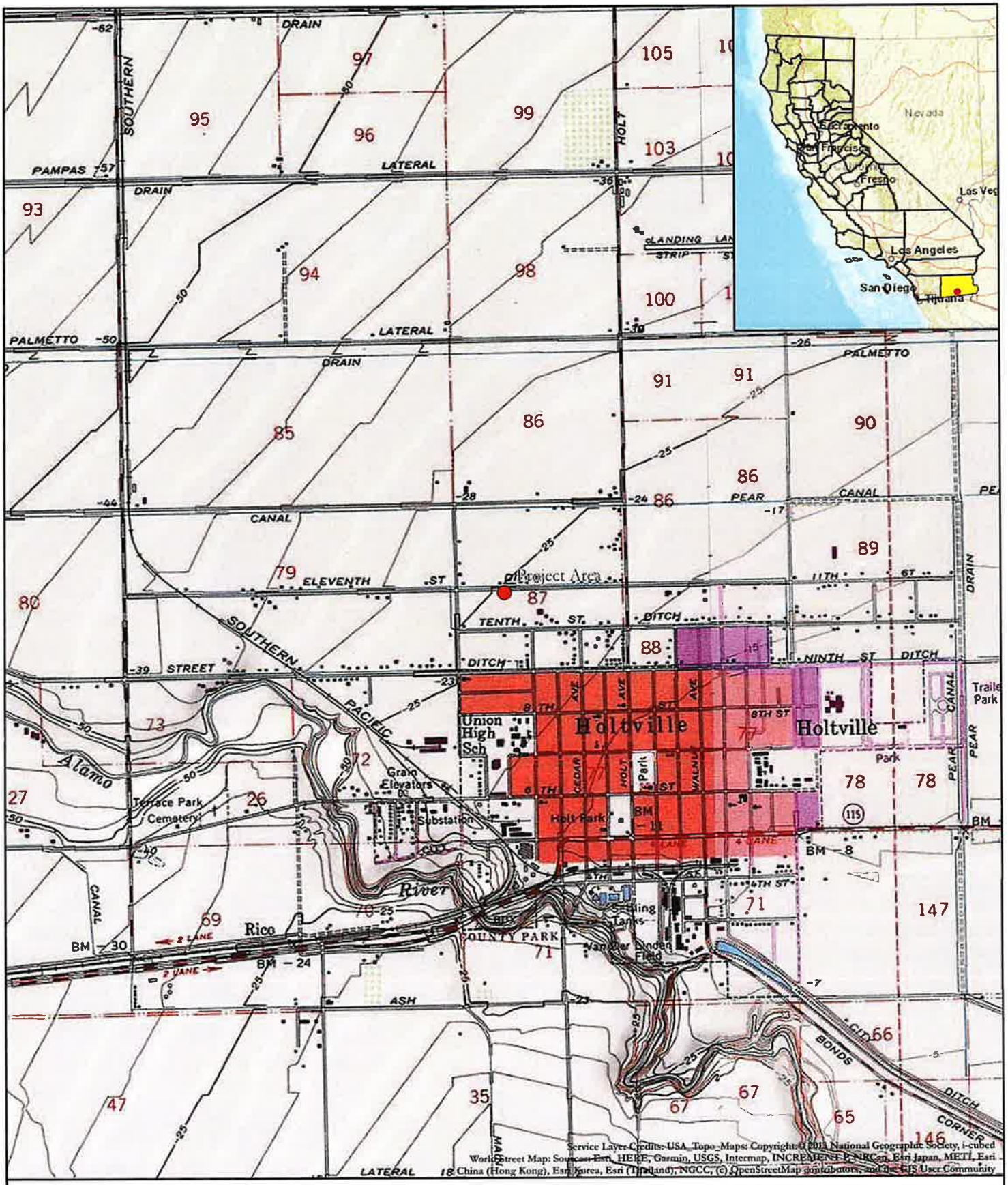


Figure 1. Project Location US-CA-5363 Holtville CA (C-0577)
Imperial County, CA

DUKE CRM

Holtville West, Calif USGS 7.5-minute quadrangle
T15S, R15E, Section 26
Date of Map: 1956/Rev 1979

Project Area

0 .25 .5 Miles N
0 .25 .5 Kilometers
1:24,000

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Figure 2. Project Aerial Photo
US-CA-5363 Holtville CA (C-0577)
Imperial County, CA

DUKE CRM

● Project Area

0 200 400 Feet
1:5,000
N

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Samantha Neary

From: Samantha Neary
Sent: Monday, January 20, 2025 7:53 PM
To: calshpo.ohp@parks.ca.gov
Subject: 620 Submission - US-CA-5893 - Holtville / Trinet# 754155
Attachments: US-CA-5363 - Holtville SHPO Packet.pdf

Good Evening,

Please see attached SHPO packet for a proposed telecommunications tower in Holtville, California. Please confirm receipt and let me know if you have any questions.

Best,

Samantha Neary, MS
Assistant Project Manager and Migratory Bird Specialist

TRILEAF
environmental architecture engineering

2121 W. Chandler Blvd., Suite 108
Chandler, AZ 85224
Office: (480) 850-0575, ext. 958
Mobile: (480) 385-8980

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Samantha Neary

From: towernotifyinfo@fcc.gov
Sent: Monday, January 20, 2025 8:16 PM
To: Samantha Neary
Subject: Section 106 New Filing Submitted- Email ID #10656946

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

The following new Section 106 filing has been submitted:

File Number: 0011414026
TCNS Number: 288458
Purpose: New Tower Submission Packet

Notification Date: 7AM EST 01/22/2025

Applicant: VB BTS III, LLC
Consultant: Duke CRM on behalf of Trileaf Corporation
Positive Train Control Filing Subject to Expedited Treatment Under Program Comment: No
Site Name: US-CA-5363 - Holtville
Site Address: 1734 East Underwood Road
Detailed Description of Project: New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.
Site Coordinates: 32-49-18.3 N, 115-23-11.0 W
City: Holtville
County: IMPERIAL
State:CA
Lead SHPO/THPO: California Office of Historic Preservation

Consultant Contact Information:
Name: Duke CRM on behalf of Trileaf Corporation
Title: President/Principal Archaeologist
PO Box:
Address: 18 Technology Drive
Suite 103
City: Irvine
State: CA
Zip: 92618
Phone: 480-850-0575
Fax:
Email: s.neary@trileaf.com

NOTICE OF FRAUDULENT USE OF SYSTEM, ABUSE OF PASSWORD AND RELATED MISUSE
Use of the Section 106 system is intended to facilitate consultation under Section 106 of the National

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Historic Preservation Act and may contain information that is confidential, privileged or otherwise protected from disclosure under applicable laws. Any person having access to Section 106 information shall use it only for its intended purpose. Appropriate action will be taken with respect to any misuse of the system.

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TRILEAF
environmental architecture engineering
2121 West Chandler Boulevard, Suite 108, Chandler, Arizona 85224 - 480.850.0575 - www.trileaf.com

March 14, 2025

Subject: **VB BTS III, LLC – US-CA-5363 Holtville – Trileaf Project #754155**
1734 East Underwood Road, Holtville, California 92250 I
mperial County, Holtville West Quadrangle (USGS)
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W

To Whom It May Concern,

The SHPO did not respond within 30 days to Trileaf Corporation's determination of No Historic Properties in the Direct Area of Potential Effects (APE) and No Historic Properties in the Visual Area of Potential Effects (APE). As outlined in the Nationwide Programmatic Agreement (NPA), this establishes a presumption that SHPO concurs with the applicant's determination that the proposed undertaking will have No Historic Properties in the Direct Area of Potential Effects (APE) and No Historic Properties in the Visual APE.

Sincerely,

Laurie Solis

Laurie Solis
Trileaf Corporation
Principal Investigator

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Appendix F

Native American Correspondence

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Tribal Summary Table

Site: US-CA-5363 - Holtville | **Site ID: US-CA-5365 - Holtville**

TCNS Number: 288458 | **FCC Start: November 29, 2024**

Tribe	TCNS auto-reply	Follow Up Request from Tribe		Follow Up(s) to Tribe		Final Reply		FCC Referral	Standing Agreements & Comments
		Date	Requested Information	Date	Sent	Date	Comments		
Campo Band of Mission Indians				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	
Cocopah Indian Tribe				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	
Eastern Shoshone Tribe				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	
La Posta Band of Mission Indians				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	
Los Coyotes Reservation	30 days no interest Notify of inadvertent discovery			1/21/2025	Sent Letter & Form 620/621	1/21/2025	Due to the project location, the tribe will defer to the local tribe.		
Pauma-Yuima Band of Mission Indians	30 days no interest Notify of inadvertent discovery			1/21/2025	Sent Letter & Form 620/621	2/20/2025	Cleared per NOO		
Quechan Indian Tribe						11/27/2024	We have no interest in this site. Requests inadvertent discovery notification.		
San Pasqual Band of Diegueno Indians	30 days no interest Notify of inadvertent discovery			1/21/2025	Sent Letter & Form 620/621	2/20/2025	Cleared per NOO		
Skull Valley Band Goshute	30 days no interest Notify of inadvertent discovery			1/21/2025	Sent Letter & Form 620/621	2/20/2025	Cleared per NOO		
Torres-Martinez Desert Cahuilla Indians				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	
Twenty Nine Palms Band of Mission Indians				1/21/2025	Sent Letter & Form 620/621	3/14/2025	Cleared by Referral	2/27/2025	

PC ORIGINAL PKG

Michael Romanoski

From: towernotifyinfo@fcc.gov
Sent: Friday, November 29, 2024 2:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED TOWER CONSTRUCTION NOTIFICATION INFORMATION - Email ID #9050881

Categories: Mike

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Applicant:

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this electronic mail message is to inform you that the following authorized persons were sent the notification that you provided through TCNS, which relates to your proposed antenna structure. The information was forwarded by the FCC to authorized TCNS users by electronic mail and/or regular mail (letter). We note that the review period for all parties begins upon receipt of the Submission Packet pursuant to Section VII.A of the NPA and notifications that do not provide this serve as information only.

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs). For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Pursuant to the Commission's rules as set forth in the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA), all Tribal Nations and NHOs listed below must be afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below, unless the proposed construction falls within an exclusion designated by the Tribal Nation or NHO. (NPA, Section IV.F.4).

The notification that you provided was forwarded to the following Tribal Nations and NHOs. A Tribal Nation or NHO may not respond until a full Submission Packet is provided. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures (NPA, Section IV.F.5). In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from the Commission (NPA, Section IV.G). These procedures are further set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

PC ORIGINAL PKG

1. THPO Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) Fort Washakie, WY - jmann@easternshoshone.org - 307-335-2081 - electronic mail
Exclusions: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandatesexpressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please utilize our ESTHPO website for online submittals. Our website address is: https://urldefense.proofpoint.com/v2/url?u=http-3A__www.esthpo.com&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=Ki1SLJ24NUjRFGFSQKvFtgz4lIGU6R8zeMWEvrmB46XvEFu_mnOLMfNvffKSvQyR&s=8h1zkbhpN-tOqnK2V3QfgpN7Z_1aYDRgwM_EJW2Vulo&e=. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where can submit relevant project files for our consultation review.

Your submission should include:
Appropriate SHPO determination or response letter Cultural Resource Report and or Archaeological Survey Report Photographic project site documentation Topographic or Quadrangle Maps Site Plans/Construction Drawings FCC Forms 620 and 621 Lat/Long Coordinates for the proposed project.
Project Coordinator Contact Information

Our 30-day review period will commence once all project details havebeen submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin, sdurgin@easternshoshone.org or by phoneat: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, NewMexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required bythe mandates expressed in 36 CFR 800, EO 13175,and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

2. Cultural Resource Manager Justin Brundin - Cocopah Indian Tribe - County 15th & Avenue G Somerton, AZ - culturalres@cocopah.com; brundinj@cocopah.com - 928-627-4849 - electronic mail
Exclusions: We would like a copy of any GIS files related to the site location and areas of potential impact.

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3. Historic Preservation Officer Jill McCormick - Quechan Indian Tribe - (PO Box: 1899) Yuma, AZ - historicpreservation@quechantribe.com - 760-919-3631 (ext: 0) - electronic mail

4. Chairman Candace Bear - Skull Valley Band Goshute - 407 Skull Valley Rd Skull Valley, UT - candaceb@svgoshutes.com; candaceb@svgoshutes.com - 435-882-4532 - electronic mail and regular mail
Exclusions: Montana And Associates LLC does not contract for Skull Valley Band of Goshute any longer. Thank you.

If the applicant/tower builder receives no response from the Skull Valley Band Goshute within 30 days after notification through TCNS, the Skull Valley Band Goshute has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Skull Valley Band Goshute in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. Cultural Resource Manager Daniel Tsosie - Campo Band of Mission Indians - 36190 Church Road Campo, CA - dtsosie@campo-nsn.gov; MarcusCuero@campo-nsn.gov - 619-760-6480 - electronic mail and regular mail

6. Chairperson Gwendolyn Parada - La Posta Band of Mission Indians - 8 Crestwood Road Boulevard, CA - lp13boots@aol.com - 619-478-2113 - electronic mail and regular mail

7. Chairman Shane Chapparosa - Los Coyotes Reservation - (PO Box: 189) Warner Springs, CA - los_coyotes@ymail.com; loscoyotes_ta@yahoo.com - 760-782-0711 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Los Coyotes Reservation within 30 days after notification through TCNS, the Los Coyotes Reservation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the Los Coyotes Reservation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

8. Cultural Clerk Chris Devers - Pauma/Yuima Band of Mission Indians - (PO Box: 369) Pauma Valley, CA - cultural@pauma-nsn.gov - 760-742-1289 - electronic mail and regular mail

If the applicant/tower builder receives no response from the Pauma/Yuima Band of Mission Indians within 30 days after notification through TCNS, the Pauma/Yuima Band of Mission Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,

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however, must immediately notify the Pauma/Yuima Band of Mission Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

9. THPO Desiree Morales Witman - San Pasqual Band of Diegueno Indians - (PO Box: 365) Valley Center, CA - thpo@sanpasqualtribe.org; angelinag@sanpasqualtribe.org - 760-749-3200 - electronic mail

If the applicant/tower builder receives no response from the San Pasqual Band of Diegueno Indians within 30 days after notification through TCNS, the San Pasqual Band of Diegueno Indians has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder,
however, must immediately notify the San Pasqual Band of Diegueno Indians in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

10. Cultural Resources Coordinator Michael Mirelez - Torres-Martinez Desert Cahuilla Indians - (PO Box: 1160) Thermal, CA - mmirelez@tmtanf.org - 760-397-0300 (ext: 1213) - electronic mail

11. Tribal Historic Preservation Officer Christopher E Nicosia - Twenty Nine Palms Band of Mission Indians - 46-200 Harrison Place Coachella, CA - TNPConsultation@29palmsbomi-nsn.gov; Christopher.Nicosia@29palmsbomi-nsn.gov - 760-775-3259 (ext: 6762) - electronic mail and regular mail
Exclusions: Anthony Madrigal, Jr., Tribal Historic Preservation Officer TNPConsultation@29palmsbomi-nsn.gov. Please call (760) 863-2489, if you have any questions.

The notification that you provided was also forwarded to the following SHPOs in the State in which you propose to construct and neighboring States. The information was provided to these SHPOs as a courtesy for their information and planning. You need make no effort at this time to follow up with any SHPO that does not respond to this notification. Prior to construction, you must provide the SHPO of the State in which you propose to construct (or the Tribal Historic Preservation Officer, if the project will be located on certain Tribal lands), with a Submission Packet pursuant to Section VII.A of the NPA unless the project is excluded from SHPO review under Section III D or E of the NPA.

None

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. However, if a proposal for PTC wayside poles falls within a designated exclusion, you need not expect any response and need not pursue any additional process with that Tribal Nation or SHPO. In addition, a particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance; or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the FCC cannot guarantee that the contact(s) listed above have opened and reviewed an electronic or regular mail notification. If you learn that any of the above contact information is no longer valid, please

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contact the FCC by emailing tcnshelp@fcc.gov. The following information relating to the proposed tower was forwarded to the person(s) listed above:

Notification Received: 11/26/2024
Notification ID: 288458
Excluded from SHPO Review: No
Tower Owner Individual or Entity Name: VB BTS III LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 49 min 18.3 sec N
Longitude: 115 deg 23 min 11.0 sec W
Location Description: 1734 East Underwood Road
City: Holtville
State: CALIFORNIA
County: IMPERIAL
Detailed Description of Project: New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.
Ground Elevation: -6.7 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 39.6 meters above ground level
Overall Height AMSL: 32.9 meters above mean sea level

If you have any questions or comments regarding this notice, please contact the FCC using the electronic Help Request form located on the FCC's website at:

https://urldefense.proofpoint.com/v2/url?u=https-3A__www.fcc.gov_wireless_available-2Dsupport-2Dservices&d=DwIFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_CdpgnVfiiMM&r=tVy9dfE6fJUkHc15_Itk39MNoGtgWe1vmeedh3_FbFk&m=Ki1SLJ24NUjRFGFSQKvFtgz4lIGU6R8zeMWEvrmB46XvEFu_mnOLMfNvffKSvQyR&s=VtMpMcaJuvnLsGYdsG_bT7FGLht2dCeqXkjfRy03d88&e=

You may also call the FCC Support Center at (877) 480-3201 (TTY 717-338-2824). Hours are from 8:00 a.m. to 6:00 p.m. Eastern Time, Monday through Friday (except Federal holidays). To provide quality service and ensure security, all telephone calls are recorded.

Thank you,
Federal Communications Commission

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Campo Band of Mission Indians
Mr. Daniel Tsosie
36190 Church Road
Campo, CA 91906

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Tsosie:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

Lee Castile

From: towernotifyinfo@fcc.gov
Sent: Thursday, February 27, 2025 8:02 AM
To: Tribal
Cc: tcnsweekly@fcc.gov
Subject: Proposed Construction of Communications Facilities Notification of Final Contacts - Email ID #37626

Categories: Lee

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Verizon Wireless
Michael Romanoski
1515 Des Peres Rd. Ste 200
Suite 200
St. Louis, MO 63131

Dear Applicant:

This letter addresses the proposed communications facilities listed below that you have referred to the Federal Communications Commission (Commission) for purposes of contacting federally recognized Indian Tribes, including Alaska Native Villages (collectively Indian Tribes), and Native Hawaiian Organizations (NHOs), as specified by Section IV.G of the Nationwide Programmatic Agreement (NPA). Consistent with the procedures outlined in the Commission's Wireless Infrastructure Second Report and Order (1), we have contacted the Indian Tribes or NHOs identified in the attached Table for the projects listed in the attached Table. You referred these projects to us between 02/20/2025 and 02/27/2025. Our contact with these Tribal Nations or NHOs was sent on 02/27/2025.

Thus, as described in the Wireless Infrastructure Second Report and Order (2), if you or Commission staff do not receive a statement of interest regarding a particular project from any Tribe or NHO within 15 calendar days of 02/27/2025, your obligations under Section IV of the NPA with respect to these Tribal Nations or NHOs are complete. If a Tribal Nation or NHO responds that it has concerns about a historic property of traditional religious and cultural significance that may be affected by the proposed construction within the 15 calendar day period, the Applicant must involve it in the review as set forth in the NPA, and may not begin construction until the process set forth in the NPA is completed.

You are reminded that Section IX of the NPA imposes independent obligations on an Applicant when a previously unidentified site that may be a historic property, including an archeological property, is discovered during construction or after the completion of review. In such instances, the Applicant must cease construction and promptly notify, among others, any potentially affected Tribal Nation or NHO. A Tribal Nation's or NHO's failure to express interest in participating in pre-construction review of an undertaking does not necessarily mean it is not interested in archeological properties or human remains that may inadvertently be discovered during construction. Hence, an Applicant is still required to notify any potentially affected Tribal Nation or NHO of any such finds pursuant to Section IX or other applicable law.

Sincerely,
Ellen Saint Onge
Federal Preservation Officer
Federal Communications Commission

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Detailed Description of Project: Our client proposes to install new antennas at a centerline height of 131 feet on a 116-foot building with an overall building height of 140.5 feet. No ground disturbance is proposed. This building is an existing telecommunications facility.

Tribe Name: Delaware Nation
Tribe Name: Shawnee Tribe
Tribe Name: Wyandotte Nation

TCNS# 287903 Referred Date: 02/26/2025 Location: 1719 Farm To Market Rd 182, Clifton, TX
Detailed Description of Project: Our client proposes the construction of a 250-foot self-support communications tower with an overall height of 260 feet, and installation of associated ground-based equipment within a 100-foot by 100-foot lease area.

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Caddo Nation of Oklahoma
Tribe Name: Comanche Nation
Tribe Name: Coushatta Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Thlopthlocco Tribal Town
Tribe Name: Tonkawa Tribe
Tribe Name: Wichita and Affiliated Tribes

TCNS# 288212 Referred Date: 02/26/2025 Location: 121 Oak Street, Zapata, TX
Detailed Description of Project: Our client proposes to construct a 360-foot guyed telecommunications tower, with an overall height of 370 feet, within a proposed 75-foot by 75-foot lease area.

Tribe Name: Apache Tribe of Oklahoma
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Kiowa Indian Tribe THPO
Tribe Name: Mescalero Apache Tribe
Tribe Name: Tonkawa Tribe

TCNS# 288906 Referred Date: 02/26/2025 Location: 48565 Highway 101, Langlois, OR
Detailed Description of Project: Our client proposes to construct a 160-ft monopole communications tower in a 50-ft by 50-ft lease space. A 12-ft wide access eas will extend SE, then SW from the lease space to Highway 101. A 10-ft wide utility eas will extend SW to existing pole.

Tribe Name: Confederated Tribes of Coos Lower Umpqua and Siuslaw Indians
Tribe Name: Confederated Tribes of the Grand Ronde Community of Oregon
Tribe Name: Cow Creek Band of Umpqua Tribe of Indians
Tribe Name: Eastern Shoshone Tribe
Tribe Name: Elk Valley Rancheria
Tribe Name: Tolowa Dee-Ni' Nation

TCNS# 288458 Referred Date: 02/26/2025 Location: 1734 East Underwood Road, Holtville, CA
Detailed Description of Project: New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.

Tribe Name: Campo Band of Mission Indians
Tribe Name: Cocopah Indian Tribe
Tribe Name: Eastern Shoshone Tribe
Tribe Name: La Posta Band of Mission Indians
Tribe Name: Torres-Martinez Desert Cahuilla Indians
Tribe Name: Twenty Nine Palms Band of Mission Indians

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1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Cocopah Indian Tribe
Mr. Justin Brundin
County 15th & Avenue G
Somerton, AZ 85350

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Brundin:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

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1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Eastern Shoshone Tribe
Mr. Josh Mann
P.O. Box 538
Fort Washakie, WY 82514

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Mann:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

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environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

La Posta Band of Mission Indians
Ms. Gwendolyn Parada
8 Crestwood Road
Boulevard, CA 91905

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Ms. Parada:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

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environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Los Coyotes Reservation
Chairman Shane Chapparosa
P.O. Box 189
Warner Springs, CA 92086

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Chairman Chapparosa:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

From: Dorothy Willis
To: Tribal
Subject: Re: TCNS # 288458 - Los Coyotes Reservation - For Review
Date: Tuesday, January 21, 2025 1:18:34 PM
Attachments: image002.png

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Good Day,
I have received, reviewed, and logged. Due to the project location, the tribe will defer to the local tribe.

Thank you,
Dorothy Willis

Los Coyotes Band of Indians

From: Tribal <tribal@trileaf.com>
Sent: Tuesday, January 21, 2025 10:05 AM
To: Ray Chapparosa <rchapparosa@loscoyotesband.org>
Cc: Dorothy Willis <dwillis@loscoyotesband.org>
Subject: TCNS # 288458 - Los Coyotes Reservation - For Review

Hello,

Please find attached the information regarding the above project. Please let me know if you have any questions or concerns as soon as possible.

Thank you,

Michael Romanoski
Tribal Consultation Manager

TRILEAF
environmental architecture engineering

1515 Des Peres Rd, Suite 200
St. Louis, MO 63131
Office: (314) 997-6111, ext. 248
Mobile: (636) 577-5071

This email has been scanned for spam and viruses by Proofpoint Essentials. Click here to report this email as spam.

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Pauma-Yuima Band of Mission Indians
Mr. Chris Devers
P.O. Box 369
Pauma Valley, CA 92061

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Devers:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

Courtney Miranda

From: towernotifyinfo@fcc.gov
Sent: Wednesday, November 27, 2024 9:37 AM
To: Tribal
Cc: tcns.fccarchive@fcc.gov; historicpreservation@quechantribe.com
Subject: Reply to Proposed Tower Structure (Notification ID: 288458) - Email ID #9051514

Categories: Responses to File

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Dear Michael Romanoski,

Thank you for using the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). The purpose of this email is to inform you that an authorized user of the TCNS has replied to a proposed tower construction notification that you had submitted through the TCNS.

The following message has been sent to you from Historic Preservation Officer Jill McCormick of the Quechan Indian Tribe in reference to Notification ID #288458:

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

For your convenience, the information you submitted for this notification is detailed below.

Notification Received: 11/26/2024
Notification ID: 288458
Tower Owner Individual or Entity Name: VB BTS III LLC
Consultant Name: Michael Romanoski
Street Address: 1515 Des Peres Rd. Ste 200
Suite 200
City: St. Louis
State: MISSOURI
Zip Code: 63131
Phone: 314-997-6111
Email: tribal@trileaf.com

Structure Type: MTOWER - Monopole
Latitude: 32 deg 49 min 18.3 sec N
Longitude: 115 deg 23 min 11.0 sec W

PC ORIGINAL PKG

Location Description: 1734 East Underwood Road
City: Holtville
State: CALIFORNIA
County: IMPERIAL

Detailed Description of Project: New 130ft. monopole. Equip w/in new 40ft.x40ft. lease area (LA). New 30ftx50ft. access/utility esmt N of LA & incl 50in.x52in. pad E of prop LA. Prop elec utility to run N from prop transformer approx 100ft to existing utility pole N of Thiesen Rd.
Ground Elevation: -6.7 meters
Support Structure: 36.6 meters above ground level
Overall Structure: 39.6 meters above ground level
Overall Height AMSL: 32.9 meters above mean sea level

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https://us1.proofpointessentials.com/app/report_spam.php?mod_id=11&mod_option=logitem&report=1&type=easyspam&k=k1&payload=53616c7465645f5fd1a155fa1bbef965044c21b1d8d3e35eaac54b7d9cbd9017d924ca53f1218544bd7535f22154534fe710cfd5c214f1da51dfd81f22254010a5a4b94284f0e5b120f91219c8e4348bcb9d1eac4228ee88533a89414349d35084343cb66a87253efb86262ba666a897e0411015b69cc8078456f25cb25a8a55e5769805971dc5eb130c12a27d86944dddf0cf6bb148a6071d712d552208295f

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

San Pasqual Band of Diegueno Indians
Ms. Desiree Witman
PO BOX 365
Valley Center, CA 92082

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Ms. Witman:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Skull Valley Band Goshute
Ms. Candace Bear
407 Skull Valley Rd
Skull Valley, UT 84029

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Ms. Bear:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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Sincerely,

Michael Romanoski
Tribal Consultation Manager

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TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Torres-Martinez Desert Cahuilla Indians
Mr. Michael Mirelez
PO Box 1160
Thermal, CA 92274

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Mirelez:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

Our client proposes to construct a new 120-foot-tall (130-foot-tall overall) monopole telecommunications structure. Ground-based equipment will be installed within a proposed 40-foot by 40-foot equipment lease area. Additionally, a new transformer will be installed onto a proposed 50-inch by 52-inch concrete pad directly east of the proposed lease area. A proposed 12-foot-wide graveled access road will extend north away from the proposed lease area to Thiesen Road. A proposed electric utility will extend north from the proposed transformer approximately 100 feet to an existing utility pole on the north side of Thiesen Road. Project area is surrounded by rural residential development and agricultural land.

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Sincerely,

Michael Romanoski
Tribal Consultation Manager

PC ORIGINAL PKG

TRILEAF
environmental architecture engineering
1515 Des Peres Road, Suite 200, Saint Louis, Missouri 63131 - 314.997.6111 www.trileaf.com

January 21, 2025

Twenty Nine Palms Band of Mission Indians
Mr. Christopher Nicosia
46-200 Harrison Place
Coachella, CA 92236

RE: VB BTS III, LLC
Trileaf Project # 754155 / US-CA-5365 - Holtville / US-CA-5363 - Holtville
1734 East Underwood Road, Holtville, Imperial County, CA 92250
Latitude: 32° 49' 18.25" N, Longitude: 115° 23' 10.98" W
TCNS # 288458

Dear Mr. Nicosia:

This project was originally submitted in TCNS on 11/29/2024. Trileaf Corporation is in the process of completing a NEPA Review at the above referenced property. Our investigation includes determining if the site is contained in, on, or within the viewshed of a building, site, district, structure or object, significant in American history, architecture, archeology, engineering or culture, that is listed or eligible for listing on the State or National Registers of Historic Places, or located in or on, or within the viewshed of an Indian Religious Site. Trileaf has learned your tribe has an interest in property located within this County.

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The form 620/621 submission packet is attached for your review. Please let us know if you have any objections or comments on this project as soon as possible. Contact me at (314) 997-6111 or email tribal@trileaf.com if you have any questions. Thank you for your assistance in this regard.

Sincerely,

Michael Romanoski
Tribal Consultation Manager

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Appendix G

Resumes

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Professional Resume

SAMANTHA NEARY, M.S.

ASSISTANT PROJECT MANAGER

Education

Biology, M.S. / Emphasis in Marine Ecology
San Diego State University / San Diego, CA

Zoology, B.S. / Emphasis in Limnology
University of Wisconsin-Madison / Madison, WI

Areas of Expertise

Ms. Neary has experience performing field visits for National Environmental Policy Act (NEPA) and Section 106 reviews for commercial real estate, lending, and wireless telecommunications projects. This includes characterization of habitats, pre-build surveys for critical species habitats, and migratory bird evaluations. In addition, Ms. Neary has experience overseeing and completing field surveys and biological assessment reports for CEQA analysis.

Environmental service expertise includes:

Phase I/II Environmental Site Assessments
Property Condition Assessments (PCA)
Indoor Air Quality Assessments
National Wetland Inventory Maps
Flood Insurance Rate Maps
Critical Habitat Maps
Environmental Evaluation Summaries
Soil Characterization
Field Reconnaissance
Section 106 Compliance
NEPA Environmental Assessments
Migratory Bird Evaluations
Form 620/621 Submittals
Historical Topographic Maps and Aerial Imagery
Mold and Lead-Based Paint Surveys
Local Government Consultation
Land Use History

Certifications/Affiliations

Articulated, Mobile, Single and Extension, and Stepladder Safety
Basic Wetland Delineation Course (2024)
Desert Tortoise Council Introductory Course
OSHA 40-Hour HAZWOPER
Western Society of Naturalists, member since 2016
American Academy of Underwater Scientists, member since 2017
AAUS Certified Scientific Diver
Adult and Pediatric First Aid/CPR/AED/O_2

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TRILEAF

Professional Resume

BRANDY MOSS

SENIOR PROJECT MANAGER

Education

B.S. Environmental Technology Management
Arizona State University/ Mesa, AZ

Areas of Expertise

Ms. Brandy Moss has experience performing site inspections and conducting due diligence pursuant to EPA All Appropriate Inquiries (AAI) and the American Society of Testing and Materials (ASTM), as well as performing National Environmental Policy Act (NEPA) reviews for commercial real estate, lending, and wireless telecommunications projects. Ms. Moss operates as the primary point-of-contact for clients over a large geography, specializing within the Western Region of the United States.

Environmental service expertise includes:

Asbestos Inspections
Construction Environmental Oversight
Business Development
Environmental Evaluation Summaries
Environmental Baseline Studies
FCC Regulatory Compliance
Health and Safety Plans
Migratory Bird Evaluations
Native American Consultation
NEPA Environmental Assessments
Phase I/II Environmental Site Assessments
Preliminary Risk Assessments
Records Search with Risk Assessment (RSRA)
SBA Loans
Soil and Groundwater Management Plans
Soil Characterization
Soil Management and Disposal
Transaction Screen Assessments
Waste and Recycling Implementation and Planning
Vendor Management

Additionally, Ms. Moss has experience in conservation and water monitoring at ASARCO Ray Mine, along with waste and recycling implementation for Gila River Gaming Enterprises (GRGE). Ms. Moss has specialized experience performing, planning, and managing Phase I and Phase II Environmental Assessments for various commercial, industrial, agricultural, and residential properties.

Certifications/Affiliations

Adult Child Infant CARE CPR & First Aid Certification
Burrowing Owl Survey Certification, U.S. Fish and Wildlife Service and Arizona Game and Fish
Certified Asbestos Building Inspector – (EPA License #CA-089-05)
Environmental Professional (EP) as defined by ASTM Standard E1527-21 (AAI)
OSHA 40-Hour HAZWOPER

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ASSURANCE DEVELOPMENT

Attachment 20

IVECA Public Benefit Agreement *(New)*

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Docusign Envelope ID: 289D61D1-7DC6-4C63-9510-CC295FDE4763

Vertical Bridge REIT, LLC
22 West Atlantic Avenue, Suite 310
Delray Beach, Florida 33444
+1 (561) 948 - 6367
VerticalBridge.com

Public Benefit
In the interest of the Imperial Valley Emergency Communications Authority (IVECA), the county of Imperial (County), and for public benefits including, but not limited to, health and safety, EMS, fire, and law enforcement services, and the greater good of the residents of the County, a Public Benefit Program is herewith established.

The program, under the direction of IVECA, shall secure from Vertical Bridge (VB BTS III, LLC) or any successor, tower space on a space available basis with an approximate maximum height of sixty-five feet (65') for the purpose of mounting one (1) or multiple communication antennas and infrastructure. Included in the Public Benefit Program are ground space for an equipment shelter, or ground-mounted equipment cabinet(s), miscellaneous infrastructure space, emergency power generator space, and ice bridge space, to be approved through the Vertical Bridge colocation application. Should future space be available above the 65' height, discussion may ensue between IVECA and Vertical Bridge concerning antenna and infrastructure location by IVECA or the County. It is understood that the outcome of said dialogue concerning space above the 65' height may be unfavorable to IVECA. All tower and ground space shall be at no cost to IVECA or the County with all terms of the Public Benefit Program in perpetuity throughout the lease term and lease extensions.

The structure must possess sufficient structural capacity to safely support IVECA's or the County's equipment, as verified by a licensed structural engineer. Vertical Bridge shall not be responsible for any structural modifications, reinforcements, or upgrades required to accommodate IVECA's or the County's equipment.

Any IVECA or County-installed communication antenna(s) must be designed, installed, and operated in a manner that does not interfere with the function, signal quality, or operations of any existing antenna(s) or equipment currently operating at the site.

On information received from Imperial County Planning & Development Services, Public/Local Benefit Programs involving communication sites shall be negotiated with the communication site of interest principals and those seeking the Public/Local Benefit Program. (End)

Kind Regards,
Signed by:
X Patrick Bardone
B3CEEFD4E8B4492...
Patrick Bardone | Vice President Development
Vertical Bridge REIT, LLC
22 West Atlantic Avenue, Suite 310
Delray Beach, FL 33444

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ASSURANCE DEVELOPMENT

Attachment 21

Fall Zone Letter *(New)*

PC ORIGINAL PKG

N E L L O

1201 S Sheridan St
South Bend, IN 46619

Phone: 574-288-3632
Fax: 574-288-5860
www.nelloinc.com

September 18, 2025

Vertical Bridge
22 W Atlantic Ave, Suite 310
Delray Beach, FL 33444

Re: Proposed 119' Nello NTP Tower
Nello Quote #: RFQ96565
Site: US-CA-5363 / Holtville

To Whom It May Concern:

This letter is regarding your inquiry about the expected performance of your proposed tower that will be quoted by Nello based on site-specific criteria.

Our towers are designed to meet or exceed industry standards defined by TIA-222-H, "Structural Standards for Antenna Supporting Structures and Antennas" (TIA Standard). It is our opinion that the possibility of a tower collapse is very unlikely. The tower is designed using extreme wind and ice conditions. In fact, wind speeds specified by the TIA Standard are 50-year wind speeds. That is, they have only a 2% statistical chance of occurring in any given year.

This tower will be designed using the following wind conditions as a minimum: a 98 mph 3-second gust wind speed with no ice. The TIA Standard specifies 98 mph as the wind speed required for this site in Imperial County, California. The "3-second gust wind speed" refers to a wind measured at 33 feet above the ground. Equations in the TIA Standard take into account that wind speed escalates with increasing height of the tower.

Although we cannot guarantee exactly how a tower would fall if it were to fail, the most likely mode of failure would be a buckling failure of one of the tower sections due to excessive wind loading. Nello will design the tower to stay within a fall radius of 5 feet based on design stress levels in accordance with the TIA-222-H Standard and the currently adopted IBC.

The fall radius statement above assumes proper foundation construction and tower installation. The foundation design should be reviewed to ensure that no foundation limit state governs the entire structural system and negates the fall radius design. The fall radius expectancy requires that the foundation be designed with a capacity greater than that of the tower capacity. If the foundation design used in association with this tower is performed by a third party then Nello must be provided the opportunity to review the design in order to confirm that the fall radius remains satisfactory. If for some reason Nello does not provide the tower design or is not given the opportunity to design or review the foundation for this specific project then the content of this letter becomes void.

We hope this has given you a greater degree of comfort regarding the design of your structure. If you have any other questions or concerns regarding the design of your site-specific tower, please contact our engineering or sales department.

Sincerely,

Jason Lambert

Jason M. Lambert, PE
Vice President of Engineering
Nello

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ATTACHMENT "K"

COMMENT LETTERS

PC ORIGINAL PKG

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

August 22, 2025
Sent via e-mail

RECEIVED
AUG 22 2025
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Luis Bejarano
Planner II
Imperial County
801 Main Street
El Centro, CA 92243
luisbejarano@co.imperial.ca.us

Dear Luis Bejarano:

Conditional Use Permit #25-0004 /Variance #25-0001/ Initial Study #25-0012 Vertical Bridge Tower (PROJECT)
NEGATIVE DECLARATION (ND)
SCH# 2025080123

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an ND from Imperial County for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Vertical Bridge BTS III, LLC

Objective: The Project proposes to construct a wireless communications facility, which consists of a 120-foot unmanned monopole tower with a 10- foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. leased, fenced area. The tower will contain up to 12 panel antennas, 12 remote radio units, a 2' microwave antenna, 1 GPS antenna, 1 back-up diesel generator, and required antenna cabling along with all associated mounting equipment. The 1,600 sq. ft. lease area will be surrounded by a 6 feet high chain link fence. Space for two additional future co-locators has been made available on the tower. The ground equipment will also be contained within the fenced area, including two (2) ground-mounted radio cabinets, one (1) back-up diesel generator and an ice bridge from the radio cabinets to the tower to protect the cables that run between the equipment cabinets and the tower/antennas. Proposed access to the lease area is a 30 ft long and 12 ft wide graveled road. A proposed Imperial Irrigation District transformer will be added adjacent to the lease area.

Location: The Project will be located at 1734 E Underwood Rd, Holtville, CA 92250 on a 5.51-Acre parcel located within a lot containing an existing residence. The latitude and longitude for this Project site are 32.821113, -115.385844. The property's Assessor's Parcel Number (APN) is 045-600-017-000. The proposed project site is surrounded by parcels zoned as Limited Agriculture with an Urban Overlay on the North, East and West and by other parcels zoned as light Residential with an Urban Overlay on the South.

Timeframe: The ND does not provide any information regarding the timeframe for the proposed Project.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

I. Environmental Setting and Related Impact Shortcoming

COMMENT #1: Nesting Birds

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IS/ND Document, Page #18

Issue: CDFW is concerned that the ND does not sufficiently identify Project impacts to nesting birds and the document does not provide any avoidance, minimization or mitigation measures to ensure that the project impacts are less than significant.

Specific impact: Project implementation could result in the loss of nesting and/or foraging habitat onsite.

Evidence impact would be significant: It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.)

Recommended Potentially Feasible Mitigation Measure: CDFW recommends the County add the following measure for nesting birds to ensure that impacts to nesting birds are reduced to less than significant:

***Biological Resources Mitigation Measure 1 (*MM BIO-1):**

Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.

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COMMENT #2: Burrowing Owl (*Athene cunicularia hypugaea*)

IS/ND Document, Page #18

Issue: Western burrowing owl is a candidate listed species under CESA, as such is granted the full protection of a threatened species under CESA. CDFW is concerned that the ND does not sufficiently identify Project impacts to burrowing owl or ensure that impacts are reduced to a level less than significant.

Specific impact: Page 18 of the ND states that the project "is within the 'Burrowing Owl Species Distribution Model' according to the Imperial County General Plan's Conservation and Open Space Element." CDFW notes that in California, preferred habitat for burrowing owl is generally typified by short, sparse vegetation with few shrubs (Haug et al. 1993), and that burrowing owls may occur in ruderal grassy fields, vacant lots, and pastures if the vegetation structure is suitable and there are useable burrows and foraging habitat in proximity (Gervais et al. 2003). In addition, burrowing owls frequently move into disturbed areas prior to and during construction since they are adapted to highly modified habitats (Chipman et al. 2008; Coulombe 1971). In Imperial Valley, burrowing owls are highly dependent on irrigation canals for nesting habitat (Wilkerson and Siegel 2011). CNDDB/BIOS report occurrences of burrowing owl less than 1.5 miles from the Project site.

Impacts to burrowing owls from the Project could include take of burrowing owls, their nests, or eggs or destroying nesting, foraging, or over-wintering habitat, thus impacting burrowing owl populations. Impacts can result from grading, earthmoving, burrow blockage, heavy equipment compaction and crushing of burrows, general Project disturbance that has the potential to harass owls at occupied burrows, and other activities. CDFW notes that impacts to burrowing owls could also occur outside of the peak nesting season because burrowing owls may start breeding earlier (in January) and because young owls may still be dependent on the adults until later in the fall. In addition, because some burrowing owls are resident in burrows year-round, impacts to this species could also occur outside of the peak nesting season.

Evidence impact would be significant: Imperial Valley has high rates of western burrowing owl occurrence due to agriculture ecosystems (Center for Biological Diversity et al., March 2024). As a candidate species for listing, western burrowing owl is granted the same protection as threatened or endangered species under CESA. Take of any CESA-listed species or candidate is prohibited except as authorized by state law (Fish and Game Code §§ 2080 & 2085). Take of individual burrowing owls and their nests is defined by Fish and Game Code section 86, and prohibited by sections 3503, 3503.5, and 3513. Take is defined in Fish and Game Code section 86 as "hunt, pursue, catch, capture or kill, or attempt to hunt, pursue, catch, capture or kill." Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in

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the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.)

Recommended Potentially Feasible Mitigation Measure: CDFW recommends adding a mitigation measure for burrowing owl with specific avoidance and minimization measures to ensure that impacts to burrowing owls are reduced to less than significant. CDFW recommends that prior to commencing Project activities, preconstruction surveys for burrowing owl be conducted for the entirety of the Project site by a qualified biologist in accordance with the *Staff Report on Burrowing Owl Mitigation* (CDFG 2012 or most recent version). CDFW recommends Imperial County include the following Mitigation Measure:

***Biological Resources Mitigation Measure 2 (*MM BIO-2)**

To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of

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environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the ND to assist Imperial County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nicholas Barton, Environmental Scientist at (760) 644-5711 or Nicholas.Barton@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@lci.ca.gov

ec: Heather Brashear, Senior Environmental Scientist (Supervisor), CDFW
Heather.Brashear@wildlife.ca.gov

ATTACHMENTS

Attachment A: MMRP for CDFW-Proposed Mitigation Measures

REFERENCES

California Department of Fish and Wildlife (CDFW). California Natural Diversity Database (CNDDB) Accessed: https://apps.wildlife.ca.gov/bios6/

California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation.

Center for Biological Diversity, Defenders of Wildlife, Burrowing Owl Preservation Society, Santa Clara Valley Audubon Society, Urban Bird Foundation, Central Valley Bird Club, San Bernardino Valley Audubon Society. March 2024. Petition Before the California Fish and Game Commission to List California Populations of the Western Burrowing Owl (Athene cunicularia hypugaea) as Endangered or Threatened Under the California Endangered Species Act.
Petition for the California Endangered Species Act

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Chipman, E. D., N. E. McIntyre, R. E. Strauss, M. C. Wallace, J. D. Ray, and C. W. Boal. 2008. Effects of human land use on western burrowing owl foraging and activity budgets. Journal of Raptor Research 42(2): 87- 98.

Coulombe, H. N. 1971. Behavior and population ecology of the Burrowing Owl, *Speotyto cunicularia*, in the Imperial Valley of California. Condor 73:162–176.

Gervais, J. A., D. K. Rosenberg, R. G. Anthony. 2003. Space use and pesticide exposure risk of male burrowing owls in an agricultural landscape. Journal of Wildlife Management 67: 155-164.

Haug, E. A., B. A. Millsap, and M. S. Martell. 1993. Burrowing owl (*Speotyto cunicularia*), in A. Poole and F. Gill, editors, The Birds of North America, The Academy of Natural Sciences, Philadelphia, Pennsylvania, and The American Ornithologists' Union, Washington, D.C., USA.

Socolar JB, Epanchin PN, Beissinger SR and Tingley MW (2017). Phenological shifts conserve thermal niches. Proceedings of the National Academy of Sciences 114(49): 12976-12981.

Wilkerson, RL and RB Siegel. 2011. Distribution and abundance of western burrowing owls (*Athene cunicularia hypugaea*) in southeastern California. The Southwestern Naturalist 56(3): 378-384

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Attachment A

Draft Mitigation Monitoring and Reporting Program and Draft Recommendations

Draft Mitigation Monitoring and Reporting Program (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Biological Resources (BIO)		
Mitigation Measure (MM) Description	**Implementation Schedule**	**Responsible Party**
MM BIO-1 Regardless of the time of year, nesting bird surveys shall be performed by a qualified biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.	Prior to commencing ground or vegetation disturbing activities	Project Proponent
MM BIO-2 To ensure that the Project avoids impacts to burrowing owl, preconstruction burrowing owl surveys shall be conducted no less than 14 days prior to the start of Project-related activities and within 24 hours prior to ground disturbance, in accordance with the *Staff Report on Burrowing Owl Mitigation* (2012 or most recent version). Preconstruction surveys should be repeated when there is a pause in construction of more than 30 days. Preconstruction surveys should be performed by a qualified biologist following the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*. If the preconstruction surveys confirm occupied burrowing owl habitat, Project activities shall be immediately halted. The qualified biologist shall coordinate with CDFW and prepare a Burrowing Owl Plan that shall be submitted to CDFW and USFWS for review and approval prior to commencing Project activities.	Prior to commencing ground or vegetation disturbing activities	Project Proponent

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150 SOUTH NINTH STREET
EL CENTRO, CA 92243-2850

TELEPHONE: (442) 265-1800
FAX: (442) 265-1799

AIR POLLUTION CONTROL DISTRICT

September 3, 2025

Mr. Jim Minnick
Planning & Development Services Director
801 Main St.
El Centro, CA 92243

RECEIVED
By Imperial County Plannning & Development Services at 1:22 pm, Sep 03, 2025

SUBJECT: Notice of Intent for a Negative Declaration for Conditional Use Permit 25-0004 (Initial Study 25-0012) VB BTS III, LLC

Dear Mr. Minnick:

The Imperial County Air Pollution Control District ("Air District") thanks you for the opportunity to review the Notice of Intent for a Negative Declaration for Conditional Use Permit (CUP) 25-0004 (Initial Study 25-0012) that would allow the construction of a 120-foot unmanned monopole communications tower with a 10-foot lightning rod for a total height of 130 feet on a 1,600 sq. ft. fenced area on the northern portion of Assessor's Parcel Number (APN) 045-600-017-000. In addition to a CUP, a Variance (V 25-0001) is also required to exceed the 60-foot height limitation for the A-1 (Light Agriculture) zone by 70 feet.

The Air District originally commented on this project on May 13, 2025. The Air District has no further comments except to request the applicant submit a **Construction Notice** 10 days prior to the commencement of earthmoving.

The Air District's rule book, Handbook, and other forms can be accessed via the internet at https://apcd.imperialcounty.org. Should you have questions, please call our office at (442) 265-1800.

Sincerely,
Curtis Blondell
Curtis Blondell,
APC Environmental Coordinator II

Reviewed by,
Monica N. Soucier,
APC Division Manager

NOI ND CUP 24-0004

AN EQUAL OPPORTUNITY / AFFIRMATIVE ACTION EMPLOYER

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Imperial Valley Emergency Communications
Communications Authority
2514 La Brucherie Road, Imperial, CA 92251
Voice: 442-265-6029

IMPERIAL VALLEY RCS EMERGENCY COMMUNICATIONS AUTHORITY
RECEIVED
JUL 23 202
IMPERIAL COUNTY
PLANNING & DEVELOPMENT SERVICES

Imperial County Planning & Development Services
801 Main Street
El Centro, California 92243
Attention: Mr. Luis Bejarano, Planner II
July 22, 2025

Dear Mr. Bejarano,

Thank you very much for the opportunity to comment on CUP #25-0004, Variance #25-0001, and Initial Study #25-0012.

The applicant is proposing to install a 120-foot-tall self-supported wireless telecommunication tower. The project location is 1734 Underwood Road, Holtville, CA, 92250, APN 045-600-017-000.

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 tower space and other related on-site infrastructure. The project's location is quite desirable for communication system enhancements. We therefore are respectfully requesting a Local/Public Benefit Agreement be assigned to this project. We are hopeful for Agreement language favorable to IVECA for future communication system additions in perpetuity. 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 interests of Imperial County, first responders, and the public at large are best served with the inclusion of a Local/Public Benefit Agreement.

Thank you in advance for your consideration of IVECA's request. Please contact me with any questions.

Sincerely,

Mark Schmidt
Imperial Valley Emergency Communications Authority (IVECA)
Emergency Communications Project Coordinator
markschmidt@co.imperial.ca.us
Cell: 442-283-1688

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Imperial Valley Emergency Communications Authority
2514 La Brucherie Road, Imperial, CA 92251

Mr. Luis Bejarano, Planner II
Imperial County Planning &
Development Services
801 Main Street
El Centro, California 92243-2811
September 26, 2025

RECEIVED
SEP 2 3 2025
IMPERIAL COUNTY
PLANNING DEVELOPMENT SERVICES

Project: CUP #25-0004, Variance #25-0001, Initial Study #25-0012, APN 045-600-017-000

Dear Mr. Bejarano,

On September 25, 2025, the Imperial Valley Emergency Communications Authority (IVECA) Board convened and through formal vote approved the Public Benefit Agreement provided by Vertical Bridge (VB BTS III, LLC) for CUP #25-0004. Kindly include this letter and the Public Benefit Agreement from Vertical Bridge with CUP #25-0004.

Thank you for all your assistance in this matter. Please contact me with any questions.

Sincerely,

Mark Schmidt
Emergency Communications Project Coordinator
Imperial Valley Emergency Communications Authority

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NOTICE OF PUBLIC HEARING & SCHEDULED HEARING DATE(s)

ATTENTION PROPERTY OWNER:

You are receiving this notice because you MAY have property within a half-mile (1/2) mile of the proposed project.

This notice is to advise you, (the recipient of this notice), that the ***PROJECT*** identified below, or attached hereto is currently being reviewed and processed by the County and will be heard by one or several of the below identified public hearing bodies. As an interested person or agency, you have the opportunity to comment on this project by visiting the Department to review the file, or by calling the Department for further information, or by submitting written documentation to the Department or by appearing at the public hearing.

THIS IS THE ONLY NOTICE YOU WILL RECEIVE ON THIS PROJECT, SO PLEASE NOTE THE DATE (s).
(This Notice was mailed **October 10th , 2025**)

Planning commission	**(PC)**	**[9:00 am]**	**October 22nd, 2025**

LOCATION of all HEARINGS (unless noted otherwise):

County Administration Center
(Board Room), 940 Main Street, El Centro, CA

PROJECT LOCATION: *(see attached or reverse side for map(s)*

Assessor's Parcel Number 045-600-017-000
1734 Underwood Rd, Holtville, CA 92250

The parcel is legally described as BLK 65 & W2 OF VAC ST ADJ TSTE TR 87 15-15 5.51AC
Latitude 32˚49' 16.0176" N – Longitude 115˚23' 9.1932" W

PROJECT DESCRIPTION: *(see attached or reverse side for more information)*

Vertical Bridge Tower
Conditional Use Permit #25-0004, Variance #25-0001 & Initial Study #25-0012

The Applicant has applied for Conditional Use Permit #25-0004 to install a 120-foot-tall monopole wireless telecommunication tower with a 10-foot lightning rod for a total height of 130 feet. Said tower will be located within a 1,600 sq. ft. leased, fenced area and Variance #25-0001 to exceed the 60-foot height limitation for the A-1 (Limited/Light Agriculture) zone by 70 feet.

STAFF CONTACT: **Luis Bejarano, Planner II**
PHONE: **(442) 265-1736, ext. 1745**
EMAIL: **luisbejarano@co.imperial.ca.us**

NOTE: *This is the only notice you will receive unless there is a change in the schedule. If you have questions on the project or wish to review the project file, please contact the Department for an appointment. (442-265-1736)*

Si usted requiere esta información en español, por favor de llamar al (442) 265-1736.

LB\AT\S:\ALLUSERS\APN\045\600\017\CUP25-0004_V25-0001_IS25-0012\PC\CUP25-0004 - PUBNOTE.DOC

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NOTICE OF PUBLIC HEARING
Planning Commission
October 22, 2025

Notice is hereby given that the Imperial County Planning Commission will take action on the below referenced project. The hearing will be held in the Imperial County Board Room, 940 Main Street, El Centro, California.

1. Consideration of **Conditional Use Permit #25-0004 and Variance #25-0001** as submitted by VB BTS III, LLC, the applicant, to install a 120-foot-tall wireless telecommunications monopole tower with a 10-foot lightning rod for a total height of 130 feet. Said tower will be located within a 1,600 sq. ft. leased, fenced area and Variance #25-0001 to exceed the 60-foot height limitation for the A-1 (Limited/Light Agriculture) zone by 70 feet. The proposed project site is located at 1734 Underwood Road, Holtville, CA 92250, with Assessor's Parcel Number (APN) 045-600-017-000, and further identified as BLK 65 & W2 OF VAC ST ADJ TSTE TR 87 15-15 5.51AC. Latitude 32˚49' 16.0176" N – Longitude 115˚23' 9.1932" W., County of Imperial; State of California (Supervisory District #5), [Luis Bejarano, Planner II at 442-265-1736, or via email at luisbejarano@co.imperial.ca.us].

2. **Actions:**

1. Adopt the Negative Declaration by finding that the proposed project would not have a significant effect on the environment as recommended at the Environmental Evaluation Committee (EEC) hearing on July 24, 2025; and,

2. Approve the attached Resolution and supporting findings, approving Conditional Use Permit (CUP) #25-0004 subject to all the conditions, and authorize the Planning & Development Services Director to sign the CUP upon receipt from the Permittee; and,

3. Approve the attached Resolution and Supporting Findings for Variance #25-0001.

JIM MINNICK, DIRECTOR
OF PLANNING & DEVELOPMENT SERVICES

For questions regarding these projects contact the above-mentioned Planner following the project.
Si usted requiere esta información en español, favor de llamar al (442) 265-1736
LB\AT\S:\AllUsers\APN\045\600\017\CUP25-0004_V25-0001_IS25-0012\PC\CUP25-0004 PC AGENDA.docx

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