DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759

Re-Referral
Early Consultation

Date: **October 20, 2026**

To: **Distribution List (See Attachment A)**

From: **Jeremy Ballard, Senior Planner**
Planning and Community Development

Subject: **STAFF APPROVAL APPLICATION NO. PLN2025-0087 – KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER**

Respond By: **November 9, 2026**

******PLEASE REVIEW REFERRAL PROCESS POLICY******

The Stanislaus County Department of Planning and Community Development is soliciting comments from responsible agencies under the Early Consultation process to determine: a) whether or not the project is subject to CEQA and b) if specific conditions should be placed upon project approval.

Therefore, please contact this office by the response date if you have any comments pertaining to the proposal. Comments made identifying potential impacts should be as specific as possible and should be based on supporting data (e.g., traffic counts, expected pollutant levels, etc.). Your comments should emphasize potential impacts in areas which your agency has expertise and/or jurisdictional responsibilities.

These comments will assist our Department in preparing the conditions for a Staff Approval. Therefore, please list any conditions that you wish to have included as well as any other comments you may have. Please return all comments and/or conditions as soon as possible or no later than the response date referenced above.

Thank you for your cooperation. Please call (209) 525-6330 if you have any questions.

Applicant: **Stanislaus County General Service Agency on behalf of Stanislaus County Office of Emergency Services**

Project Location: **17268 Frymire Road, between Cemetery and Morrison Road in the Knights Ferry area.**

APN: **002-044-010**

Williamson Act Contract: **N/A**

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-5)

Project Description: Request to construct a 100-foot-tall monopole emergency services communication tower on a 14.7± acre parcel in the General Agriculture (A-2-5) zoning district for exclusive use by the Stanislaus County Office of Emergency Services for public safety communications in the Knights Ferry area. The tower will improve radio communication capabilities for emergency services along the river. In addition to the tower, a 200-square-foot equipment shelter will be constructed adjacent to the tower with a total lease area of 1,300± square feet. A six-foot-tall chain link fencing will be installed around the perimeter of the lease area. The facility will be unstaffed with scheduled on-site maintenance two to three times per year. The proposed facility would meet the County's siting standards of Chapter 21.91 – Communication Facilities of the County Code. The site is currently improved with a single-family dwelling and accessory residential structures.

This application was originally referred out on October 16, 2025, for installation of a 100-foot lattice communication tower at the same location. The applicant amended the application to include installation of a monopole designed tower in lieu of the lattice design. Additionally, since the original referral, the applicant has contacted landowners with previously constructed communication facilities in the Knights Ferry area, in the hopes of arraigning co-location opportunities. To date, the applicant has not received any returned interest for collocation on any adjacent existing communication facility.

Full document with attachments available for viewing at:
http://www.stancounty.com/planning/pl/act-projects.shtm

STAFF APPROVAL APPLICATION NO. PLN2025-0087 – KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER
Attachment A

Distribution List

X	CROP DUSTERS	X	STAN CO BUILDING PERMITS DIVISION
X	FIRE PROTECTION DIST: OAKDALE RURAL	X	STAN CO HAZARDOUS MATERIALS
X	MOSQUITO ABATEMENT DIST: EASTSIDE	X	STAN CO PUBLIC WORKS
X	PACIFIC GAS & ELECTRIC	X	STANISLAUS FIRE PREVENTION BUREAU
X	MUNICIPAL ADVISORY COUNCIL: KNIGHTS FERRY	X	SURROUNDING LAND OWNERS

STANISLAUS COUNTY
CEQA RE-REFERRAL RESPONSE FORM

TO: **Stanislaus County Planning & Community Development**
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: **STAFF APPROVAL APPLICATION NO. PLN2025-0087 – KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER**

Based on this agency's particular field(s) of expertise, it is our position the above described project:

_____ Will not have a significant effect on the environment.
_____ May have a significant effect on the environment.
_____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

1.
2.
3.
4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

1.
2.
3.
4.

In addition, our agency has the following comments (attach additional sheets if necessary).

_____

_____

Response prepared by:

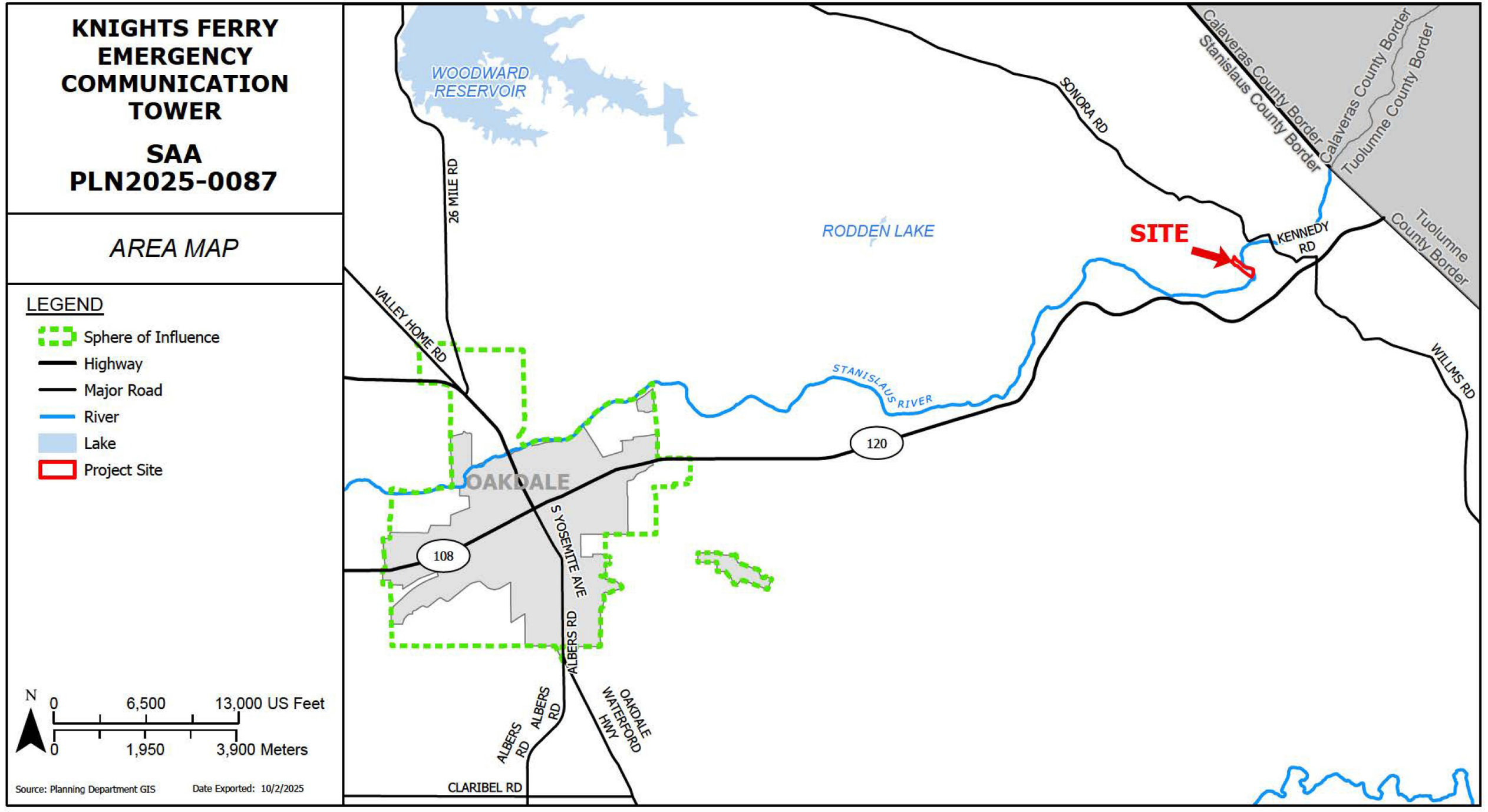
_____

Name Title Date

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

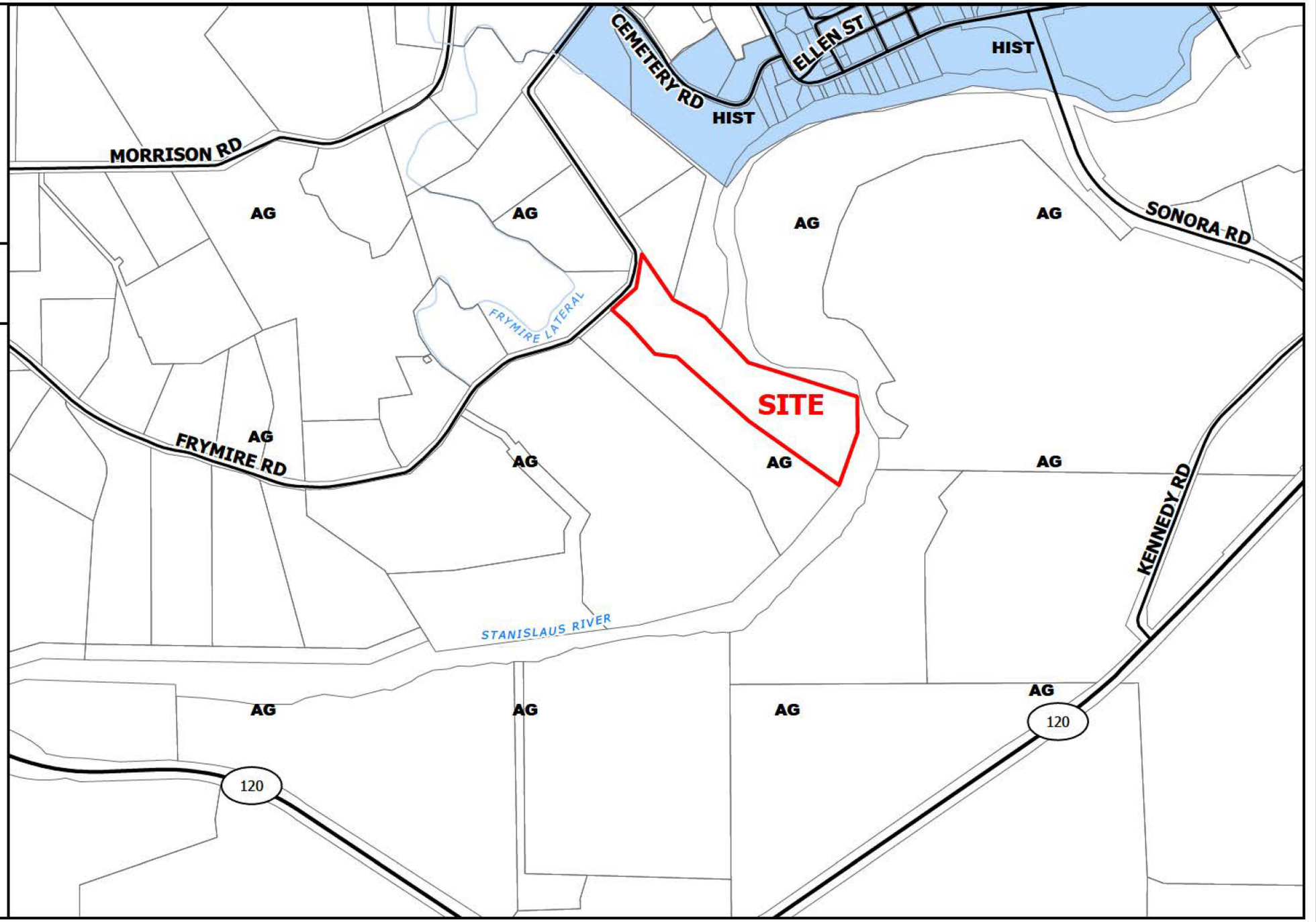
AREA MAP



KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

GENERAL PLAN MAP



LEGEND

- Highway
- Street
- Canal
- River
- Project Site

General Plan

- Agriculture (AG)
- Historical (HIST)

N

0 710 1,420 US Feet

0 210 420 Meters

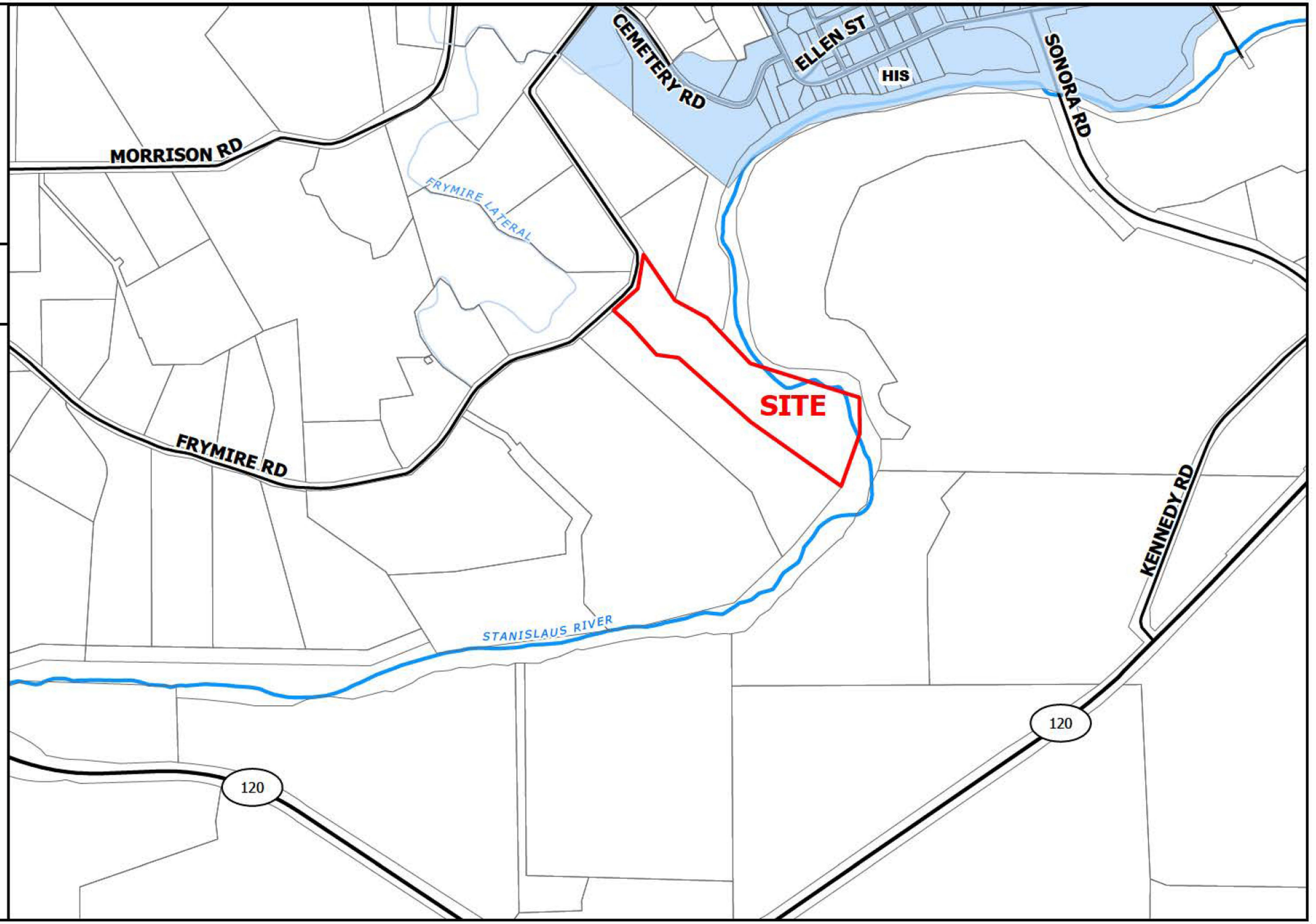
Source: Planning Department GIS

Date Exported: 10/2/2025

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

COMMUNITY PLAN MAP



LEGEND

- Highway
- Street
- Canal
- River
- Project Site

Community Plan

- HIS

N

0 710 1,420 US Feet

0 210 420 Meters

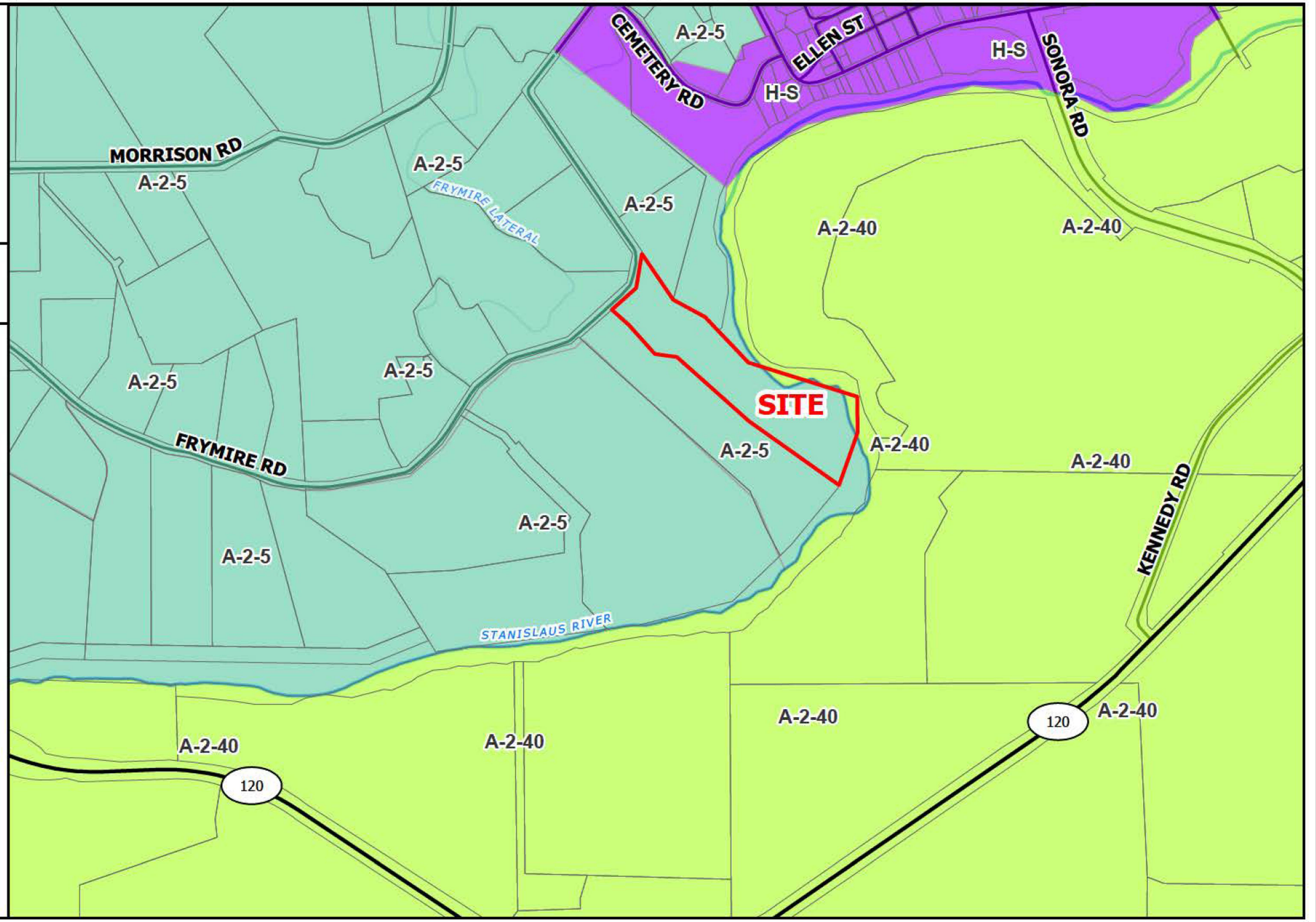
Source: Planning Department GIS

Date Exported: 10/2/2025

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

ZONING MAP



LEGEND

- Highway
- Street
- Canal
- River
- Project Site

Zoning Designation

- General AG 40 Acre (A-2-40)
- General AG 5 Acre (A-2-5)
- Historical (H-S)

N

0 710 1,420 US Feet

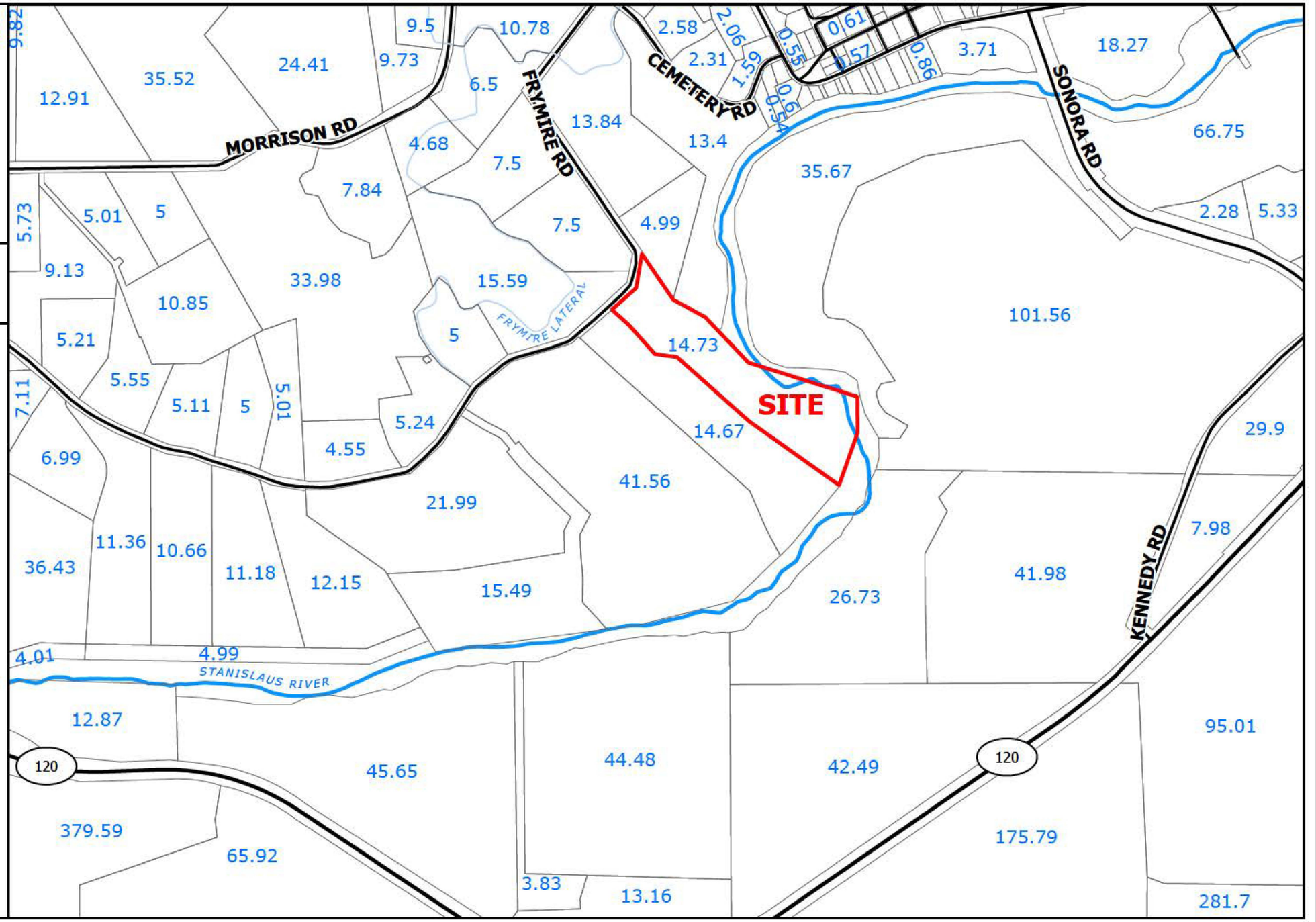
0 210 420 Meters

Source: Planning Department GIS Date Exported: 10/2/2025

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

ACREAGE MAP



LEGEND

- Acres
- Highway
- Street
- Canal
- River
- Project Site

N

0 710 1,420 US Feet

0 210 420 Meters

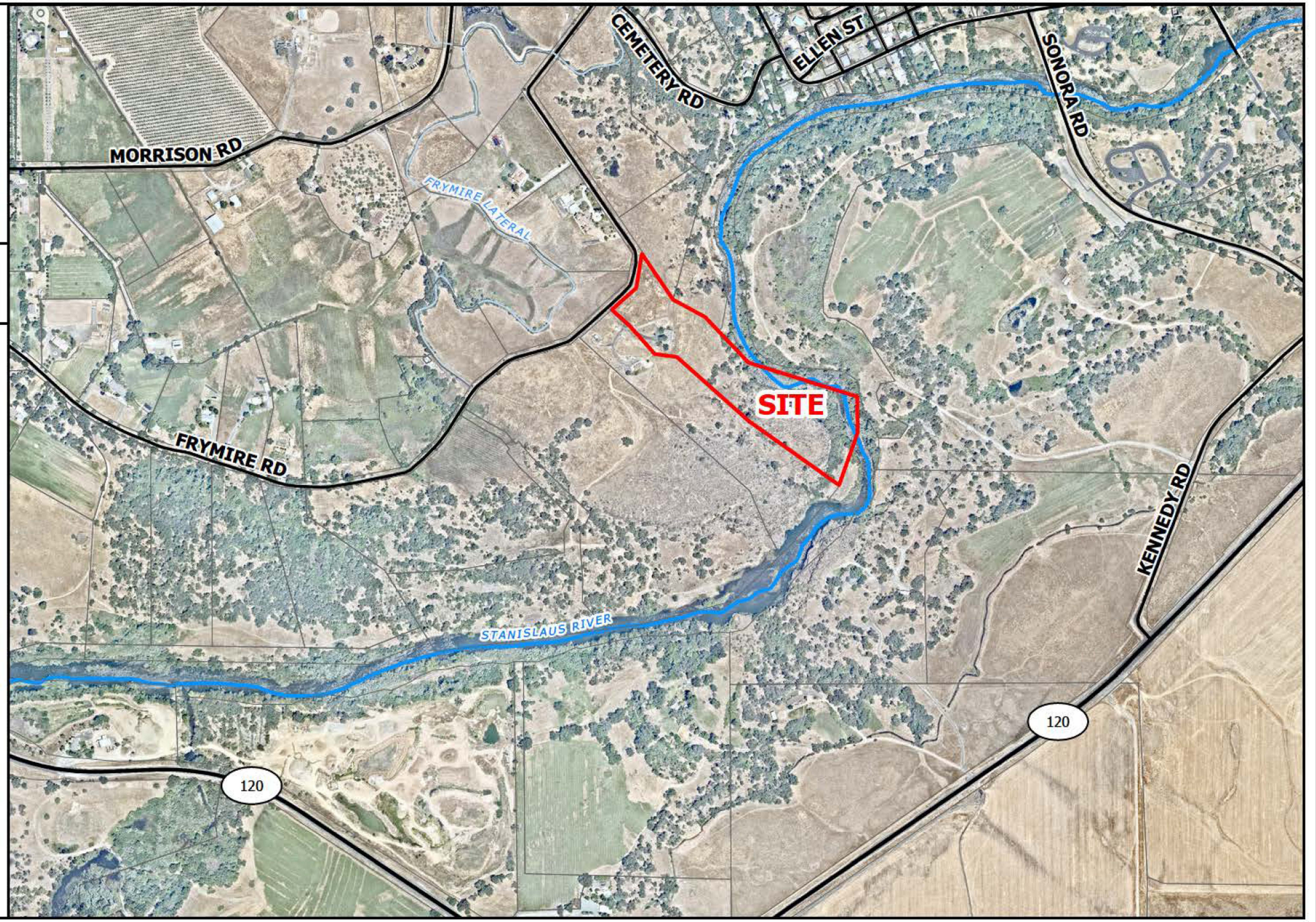
Source: Planning Department GIS

Date Exported: 10/2/2025

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

2023 AERIAL AREA MAP



LEGEND

- Highway
- Street
- Canal
- River
- Project Site

N

0 710 1,420 US Feet

0 210 420 Meters

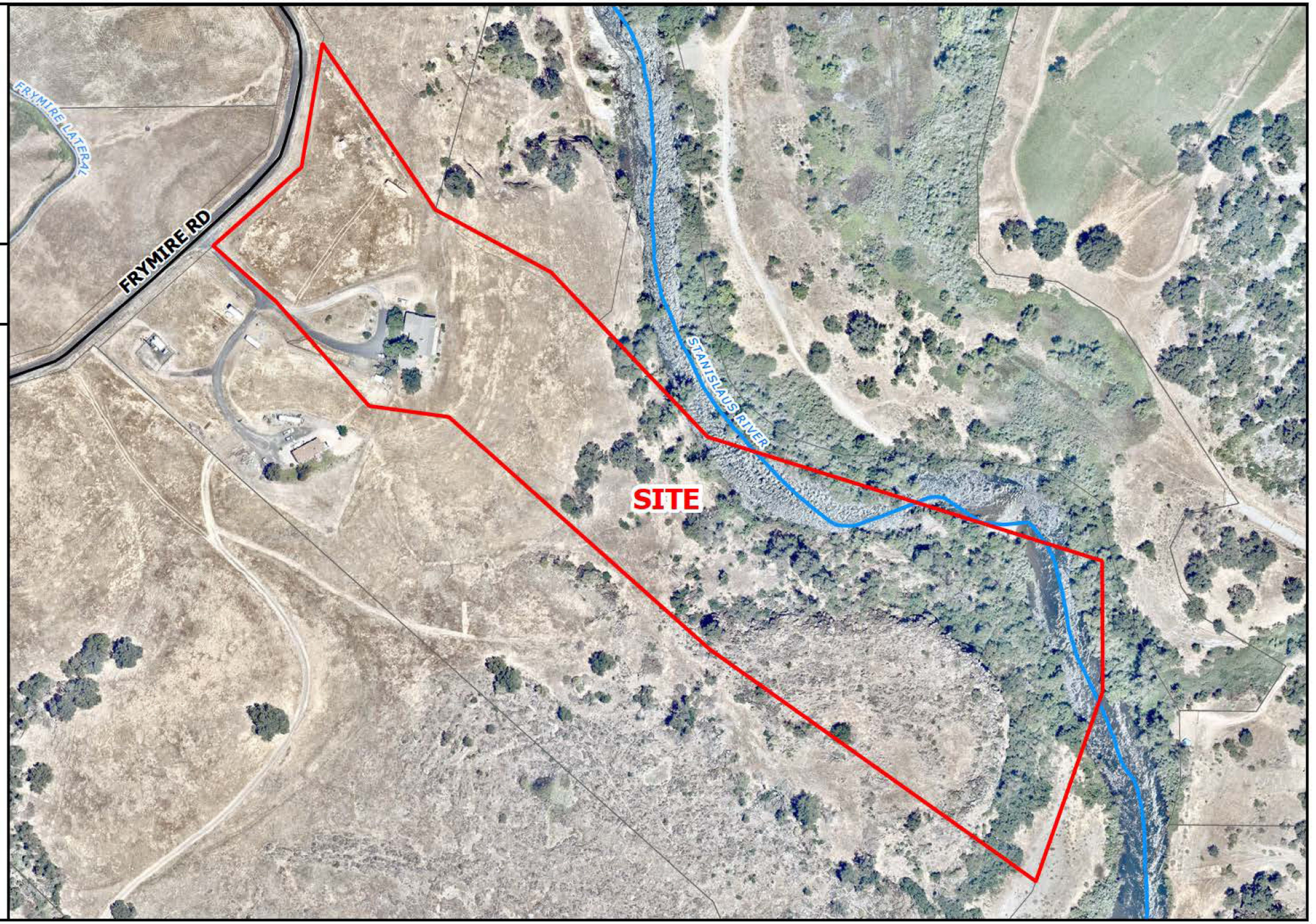
Source: Planning Department GIS

Date Exported: 10/2/2025

KNIGHTS FERRY EMERGENCY COMMUNICATION TOWER

SAA PLN2025-0087

2023 AERIAL SITE MAP



LEGEND

- Street
- Canal
- River
- Project Site

N

0 200 400 US Feet

0 55 110 Meters

Source: Planning Department GIS

Date Exported: 10/2/2025

KNIGHTS FERRY – O.E.S. COMMUNICATION TOWER PROJECT
INDEX

ATTACHMENT "A" – DETAILED WRITTEN DESCRIPTION OF USE REQUESTED

ATTACHMENT "B" – DETAILED SKETCH SHOWING APPROXIMATE STRUCTURES ON LAND WITH RESPECT TO ROAD, INTERESCTIONS, EXISTING BUILDINGS AND OR SIGNS

ATTACHMENT "C" – COPY OF THE GRANT DEED WITH LEGAL DESCRIPTION OF THE PROPERTY

ATTACHMENT "D" – STATE OF CALIFORNIA HAZARDOUS WASTE AND SUBSTANCES SITES LIST

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
1010 10TH Street, Suite 3400, Modesto, CA 95354
Planning Phone: (209) 525-6330 Fax: (209) 525-5911
Building Phone: (209) 525-6557 Fax: (209) 525-7759
Form Available Online: www.stancounty.com/planning/applications.shtm

S_____ T_____ R_____
ZONE _____
RECEIVED _____
APPLICATION NO. _____
RECEIPT NO. _____

STAFF APPROVAL PERMIT APPLICATION

The undersigned hereby makes application for a Staff Approval Permit in accordance with the provisions of the Stanislaus County Code, Chapter 21.100 and any amendments to the same, and submits the following information for consideration:

1. NAME OF APPLICANT: (a) Stanislaus County - Office of Emergency Services
   Name of firm or person

   (b) 3705 Oakdale Rd. (c) Modesto, 95357 (d) 209-404-4717
   Address City, Zip Phone

   (e) herzogm@stancounty.com
   Email address

2. NAME OF PROPERTY OWNER: (a) Frymire Carmen M Trust
   Name of firm or person

   (b) 17268 Frymire Rd. (c) Oakdale, 95361 (d) _____
   Address City, Zip Phone

3. LOCATION OF PROPERTY: 17268 Frymire Rd., Oakdale, CA 95361
   Address

4. A DETAILED WRITTEN DESCRIPTION OF USE REQUESTED: _____

   SEE ATTACHMENT "A"

5. ASSESSMENT NO. & ACREAGE OF PROPERTY: 002-044-010, 14.7 Acres

6. LIST THE NUMBER AND USE OF ALL EXISTING STRUCTURES ON PROPERTY:

   Single family dwelling and residential accessory structures

7. A DETAILED SKETCH SHOWING THE APPROXIMATE LOCATION OF ANY PROPOSED AND EXISTING STRUCTURES ON PROPERTY OR LAND IMPROVEMENTS WITH RESPECT TO ROAD INTERSECTIONS, EXISTING BUILDINGS AND/OR SIGNS. **SEE ATTACHMENT "B"**

8. IF THE STAFF APPROVAL NEEDS TO BE REFERRED OUT TO OTHER AGENCIES, A FILING FEE IN THE AMOUNT OF ONE THOUSAND, ONE HUNDRED, AND EIGHTY-EIGHT DOLLARS ($1,188.00).

   a. IF THE STAFF APPROVAL IS FOR A SINGLE-FAMILY RESIDENCE IN THE AG ZONE, OR THE STAFF APPROVAL DOES NOT NEED TO BE REFERRED TO OTHER AGENCIES, A FILING FEE IN THE AMOUNT OF THREE HUNDRED AND EIGHTY DOLLARS ($380.00).

ATTACHMENT "A"

A DETAILED WRITTEN DESCRIPTION OF THE USE REQUESTED: Public safety communications site to enhance public safety communications within the County. Currently there is no public safety communication coverage within the Knights Ferry Area. For example, when first responders are called out to a river rescue, they lose communication once they drop down into the Knights Ferry valley along the river. Stanislaus County Office of Emergency Services uses their own private communication network to cover the County, and by adding the proposed communications tower this will provide the much-needed communication coverage for the Knights Ferry Area. See page 2 of ATTACHMENT "A" showing non-communication coverage within the Knights Ferry area along with location of existing OES Towers.

Tower/Structure material and style: Monopole style tower, also see ATTACHMENT "B" for more details.

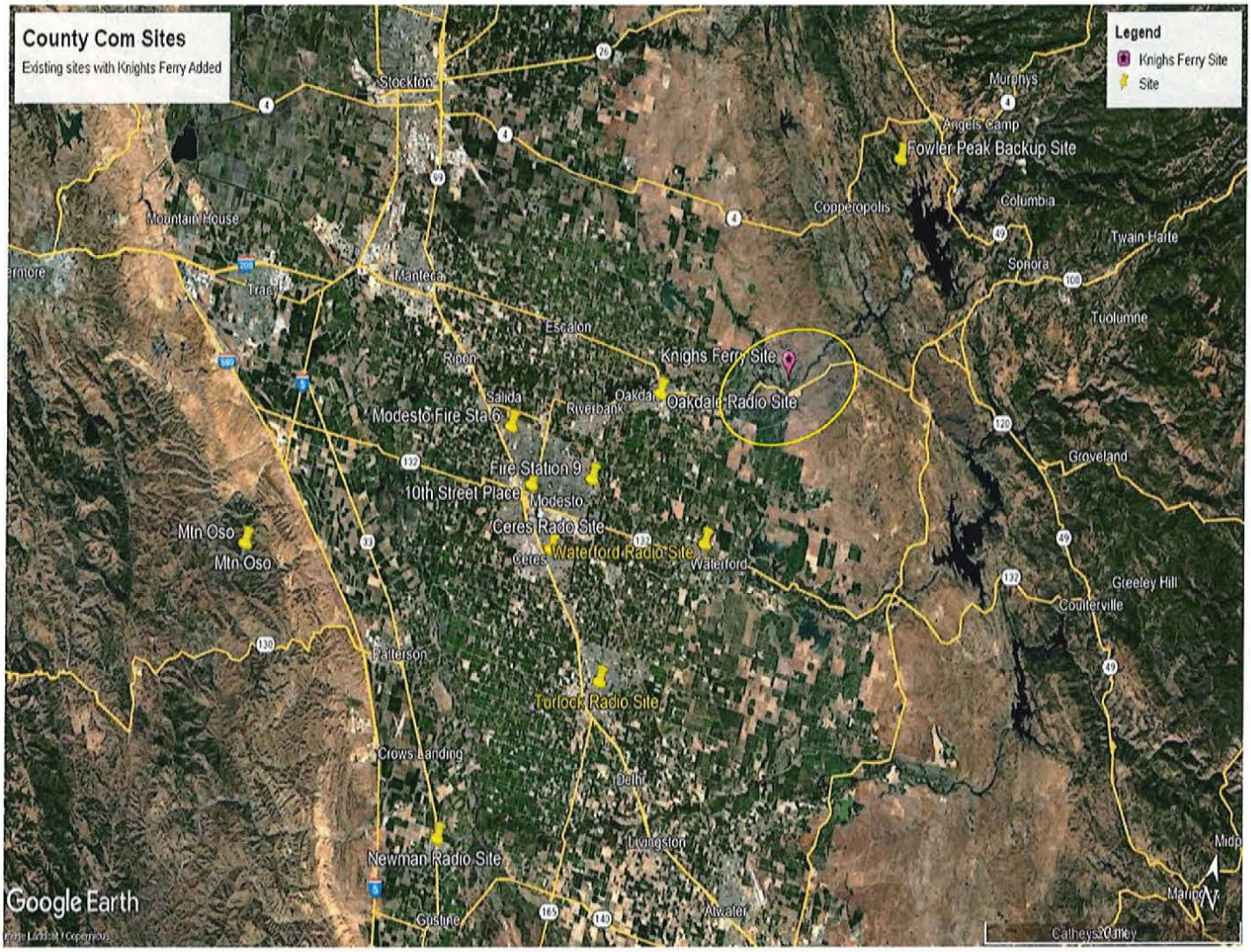
Height & Elevation: Height = 100' Feet, also see ATTACHMENT "B" for more details

How often will/maintenance service the tower: Two to three times per year unless there is an equipment issue.

Size & Location of equipment shelter: The shelter will be 10' x 20', also see ATTACHMENT "B" for more details

Size and location of property lease area: Intended lease area is approximately 36' x 36', also see ATTACHMENT "B" for more details

Setbacks of structure from adjoining off-site residences: The setbacks from structures and adjoining offsite residences are greater than 200', also see ATTACHMENT "B" for more details


County Com Sites
Existing sites with Knights Ferry Added
Legend
Knighs Ferry Site
Site
Stockton
Murphys
Angels Camp
Fowler Peak Backup Site
Copperopolis
Columbia
Twain Harte
Sonora
Tuolumne
Mountain House
Tracy
Manteca
Escalon
Ripon
Knighs Ferry Site
Salida
Oakdale
Riverbank
Oakdale Radio Site
Modesto Fire Sta 6
Fire Station 9
10th Street Place
Modesto
Ceres Radio Site
Ceres
Waterford Radio Site
Waterford
Groveland
Mtn Oso
Mtn Oso
Greeley Hill
Coulterville
Patterson
Turlock Radio Site
Crows Landing
Delhi
Livingston
Newman Radio Site
Gustine
Atwater
Google Earth

ATTACHMENT "B'

Height & Elevation: See Attachment "B"

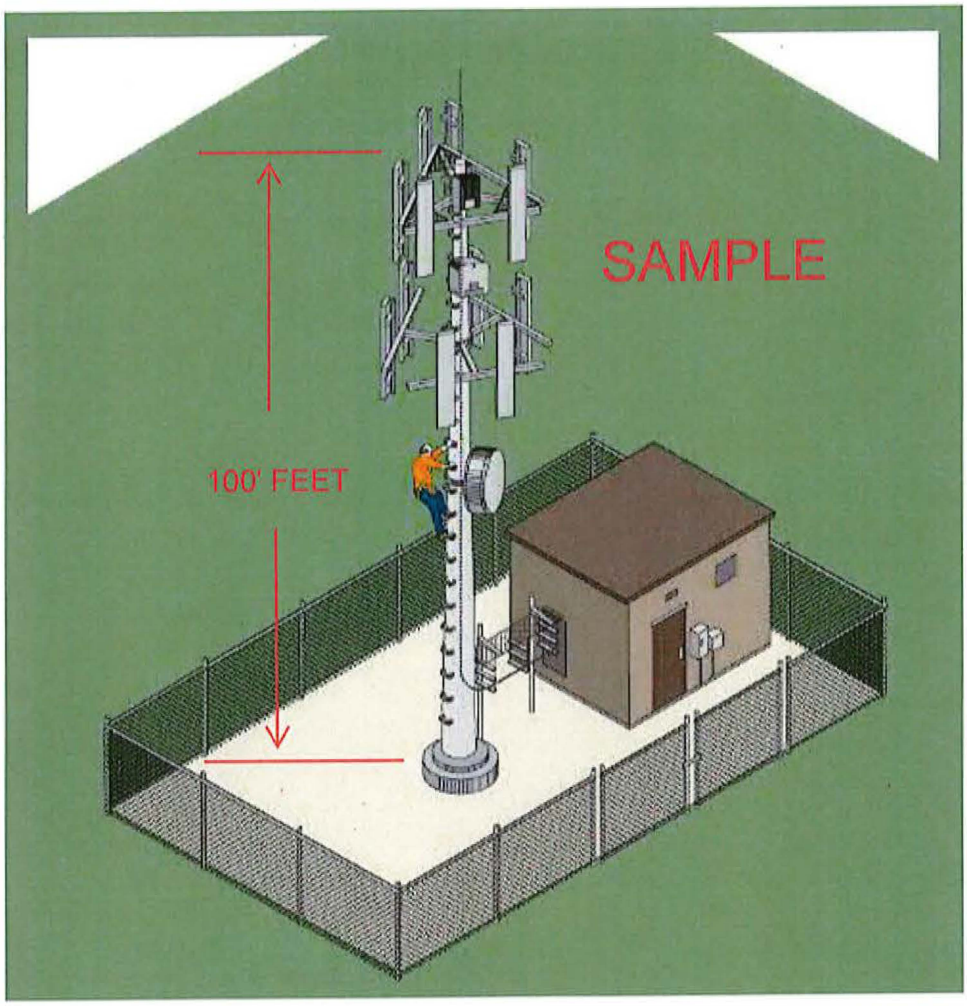
Size & Location of equipment shelter: See Attachment "B"

Size and location of property lease area: See Attachment "B"

Setbacks of structure from adjoining off-site residences: See Attachment "B"

ATTACHMENT "B"

SAMPLE TOWER ELEVATION



ATTACHMENT "B"



Tower and Communication shelter are installed on north east corner of the property along with new gate. Chain 6' link fence installed around shelter & tower with weed block and ¾' rock.

GENERAL SERVICES AGENCY

ANDREW JOHNSON
DIRECTOR/PURCHASING AGENT

AL VALENCIA
ASSISTANT DIRECTOR

BRAD DIEMER
PURCHASING MANAGER

CARA KIELY, CPA
FISCAL MANAGER

CODY NELSON
REAL ESTATE PROGRAM MANAGER

Arnett Family 2021 Trust
[redacted]
Oakdale, CA 95361

Subject: Request to Discuss Co-Location Opportunities on Communications Tower

Dear Arnett Family 2021 Trust,

The County of Stanislaus is exploring opportunities to enhance public safety and operational communications coverage within the eastern region of the county. As part of this effort, we are interested in discussing the possibility of co-locating County communications equipment on your tower located in Knights Ferry, California.

We would appreciate the opportunity to speak with you regarding available space, technical requirements, leasing terms, and any other considerations associated with a potential co-location arrangement. Our goal is to determine whether a mutually beneficial partnership is feasible.

Please provide a response within 30 days of the date of this letter to confirm your interest in discussing this opportunity. If no response is received within that timeframe, the County will consider the offer declined and will proceed with alternative site evaluations.

I look forward to hearing from you and discussing this matter further at your earliest convenience.

Sincerely,

Andy Johnson
G.S.A. Director
County of Stanislaus
johnsona@stancounty.com
[redacted]

GENERAL SERVICES AGENCY

ANDREW JOHNSON
DIRECTOR/PURCHASING AGENT

AL VALENCIA
ASSISTANT DIRECTOR

BRAD DIEMER
PURCHASING MANAGER

CARA KIELY, CPA
FISCAL MANAGER

CODY NELSON
REAL ESTATE PROGRAM MANAGER

American Tower Corporation
[redacted]
Woburn, MA 01801

Subject: Request to Discuss Co-Location Opportunities on Communications Tower

Dear Ms. Aly Lapides,

The County of Stanislaus is exploring opportunities to enhance public safety and operational communications coverage within the eastern region of the county. As part of this effort, we are interested in discussing the possibility of co-locating County communications equipment on your tower located in Knights Ferry, California.

We would appreciate the opportunity to speak with you regarding available space, technical requirements, leasing terms, and any other considerations associated with a potential co-location arrangement. Our goal is to determine whether a mutually beneficial partnership is feasible.

Please provide a response within 30 days of the date of this letter to confirm your interest in discussing this opportunity. If no response is received within that timeframe, the County will consider the offer declined and will proceed with alternative site evaluations.

I look forward to hearing from you and discussing this matter further at your earliest convenience.

Sincerely,

Andy Johnson
G.S.A. Director
County of Stanislaus
johnsona@stancounty.com
[redacted]

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

American Tower Corporation
[redacted]
Woburn, MA 01801

9590 9402 7953 2305 0796 51

2. Article Number *(Transfer from service label)*
7022 3330 0000 1602 5622

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X American Tower Corporation ☐ Agent ☐ Addressee

B. Received [redacted] of Delivery
Woburn, MA 01801 4-7

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED
APR 14 2026
Stanislaus County
Capital Facilities Division

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery (over $500)
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PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

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☐ Adult Signature Restricted Delivery $

Postage
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Total Postage and Fees
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Sent To
Street and Apt. No., or
City, State, ZIP+4®
American Tower Corporation
[redacted]
Woburn, MA 01801

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Arnett Family 2021 Trust
[redacted]
Oakdale, CA 95361

9590 9403 0406 5163 1802 90

2. Article Number *(Transfer from service label)*
7022 3330 0000 1602 5653

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [redacted]
☐ Agent
☒ Addressee

B. Received by *(Printed Name)* Sydney Arnett
C. Date of Delivery 4/7/26

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

RECEIVED
APR 14 2026
Stanislaus County
Capital Facilities Division

3. Service Type
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☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
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☐ Return Receipt for Merchandise
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PS Form 3811, April 2015 PSN 7530-02-000-9053 Domestic Return Receipt

7022 3330 0000 1602 5653

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☐ Certified Mail Restricted Delivery $
☐ Adult Signature Required $
☐ Adult Signature Restricted Delivery $

MODESTO CA POST OFFICE
MAR 30 2026
Postmark Here
CA 95350

Postage
$

Total Postage and Fees
$

Sent To
Arnett Family 2021 Trust
Street and Apt. No., [redacted]
City, State, ZIP+4®
Oakdale, CA 95361

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions