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

Referral
Early Consultation

Date: **January 14, 2026**

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

From: **Shante Ruiz, Assistant Planner**
Planning and Community Development

Subject: **STAFF APPROVAL APPLICATION NO. PLN2025-0126 – THE TOWERS, LLC**

Respond By: **February 3, 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: **The Towers, LLC**

Project Location: **642 West Mariposa Street, between Harvey Road and T Street, in the Newman area.**

APN: **026-026-029**

Williamson Act Contract: **N/A**

General Plan: **Urban Transition**

Current Zoning: **General Agriculture (A-2-10)**

Project Description: **Request to establish a wireless communications facility on a 4.92± acre parcel, in the General Agriculture (A-2-10) zoning district. This proposal includes the installation of a 130-foot-tall monopole within the midwestern portion of the property. Additionally, the facility will include: nine antennas, three RRUS, one microwave antenna, four OVP boxes and one GPS antenna. Proposed ground equipment includes two ground mounted radio cabinets, one equipment canopy, one fiber box, one 200A ILC cabinet, one manual service light switch timer, three service lights, one back-up 30kW diesel generator, four raised concrete pads, cable ice bridge, utility backboard and multi-meter utility service mounted on concrete pad. The project lease area will be 2,500± square feet in size and enclosed by a 6-foot-tall chain-link fence. A 12-foot-wide and 208-foot-long, non-exclusive access and utility easement is proposed, which will provide access to County-maintained Mariposa Street. The facility will be unstaffed with the exception of maintenance on an as needed basis. 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 one 3,292± square-foot single-family dwelling and one 564± square-foot shed. The project site is located within the LAFCO adopted Sphere of Influence for the City of Newman.

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

STAFF APPROVAL APPLICATION NO. PLN2025-0126 – THE TOWERS, LLC
Attachment A

Distribution List

X	CROP DUSTERS	X	SURROUNDING LANDOWNERS
X	FIRE PROTECTION DISTRICT: WEST STANISLAUS	X	PACIFIC GAS & ELECTRIC
X	IRRIGATION DIST: CENTRAL CALIFORNIA	X	STANISLAUS LAFCO
X	STAN CO PUBLIC WORKS	X	STAN CO BUILDING PERMITS DIVISION
X	STAN CO HAZARDOUS MATERIALS	X	MOSQUITO ABATEMENT DIST: TURLOCK
X	CITY OF: NEWMAN	X	STANISLAUS FIRE PREVENTION BUREAU

STANISLAUS COUNTY
CEQA REFERRAL RESPONSE FORM

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

FROM: _____

SUBJECT: **STAFF APPROVAL APPLICATION NO. PLN2025-0126 – THE TOWERS, LLC**

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

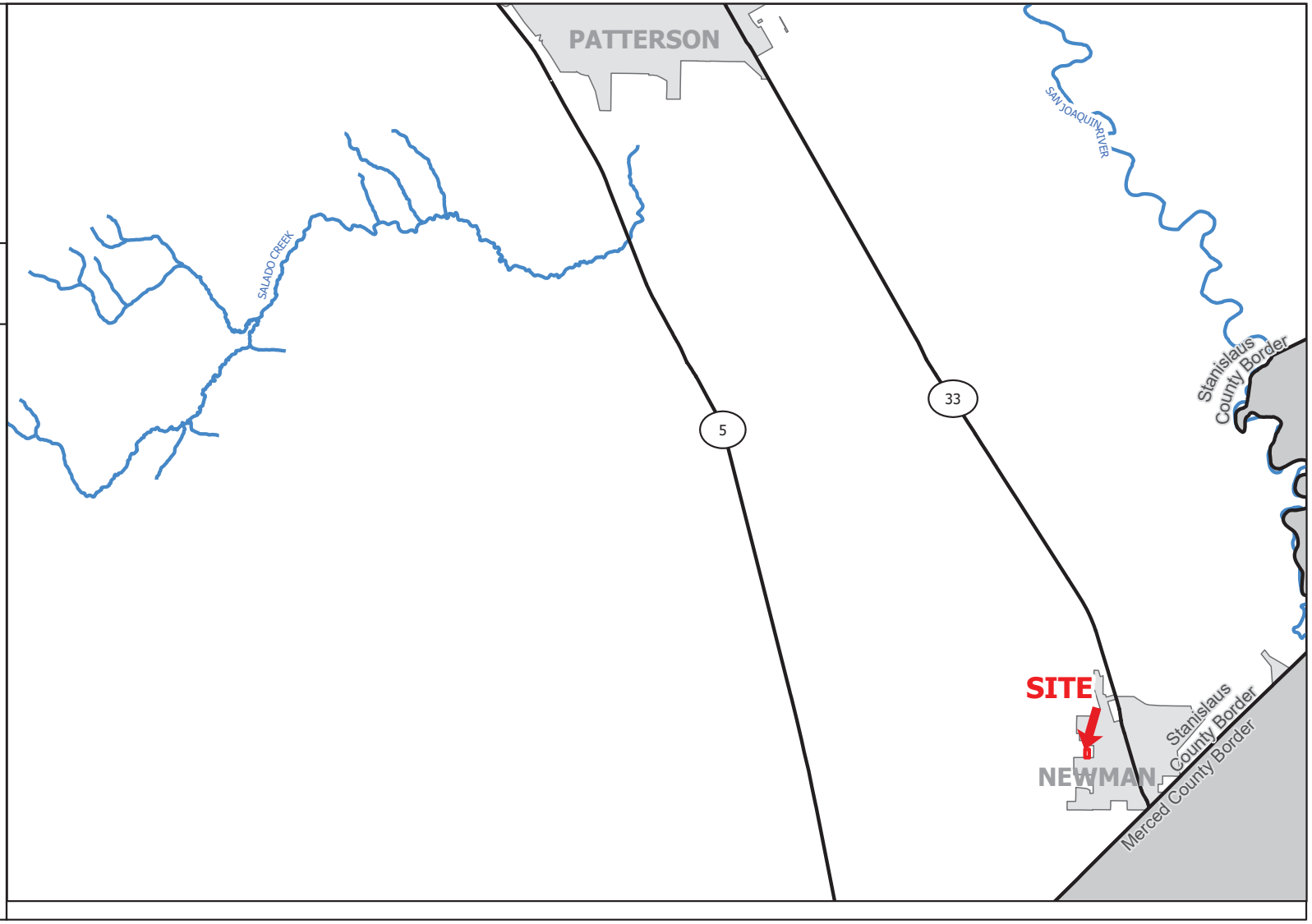
THE TOWERS

SAA PLN2025-0126

AREA MAP

LEGEND

- Highway
- Project Site
- River



N

0 2 3 Miles

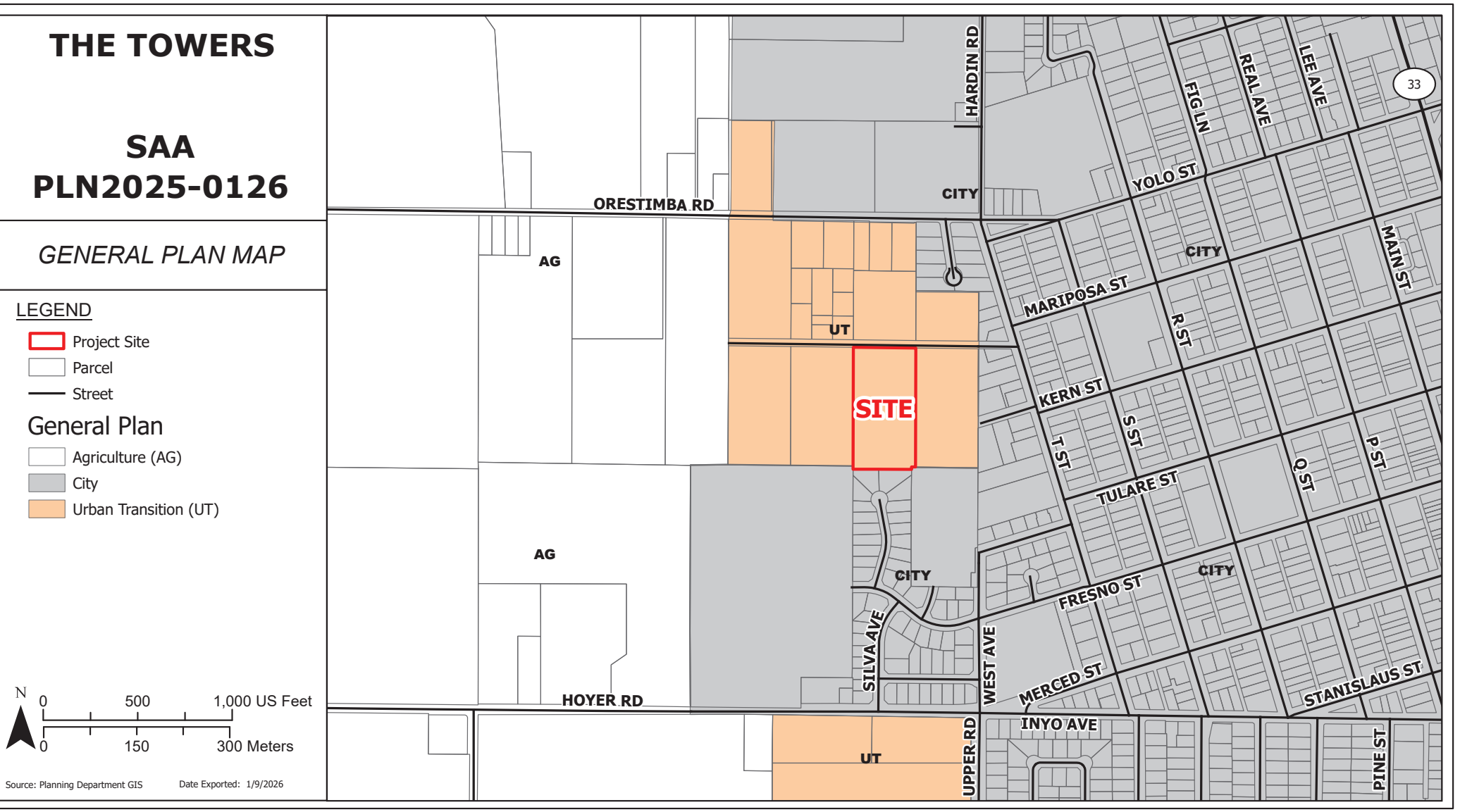
0 2 4 Kilometers

Source: Planning Department GIS Date Exported: 1/9/2026

THE TOWERS

SAA PLN2025-0126

GENERAL PLAN MAP



THE TOWERS

SAA PLN2025-0126

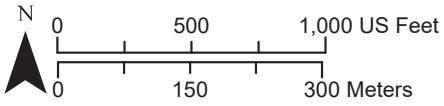
ZONING MAP

LEGEND

- Project Site
- Parcel
- Street

Zoning Designation

- City of Newman
- General AG 10 Acre UT (A-2-10)
- General AG 40 Acre (A-2-40)



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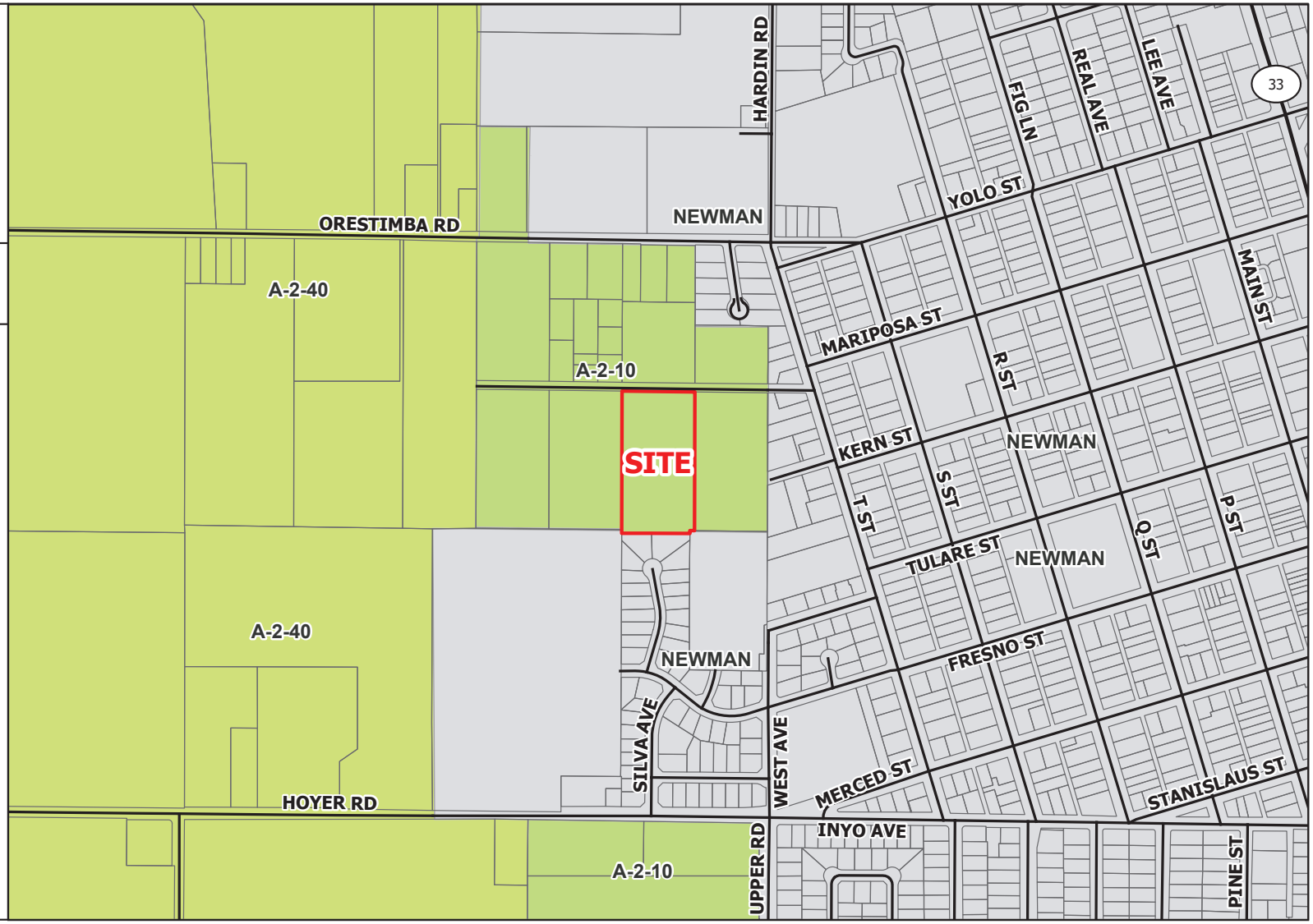


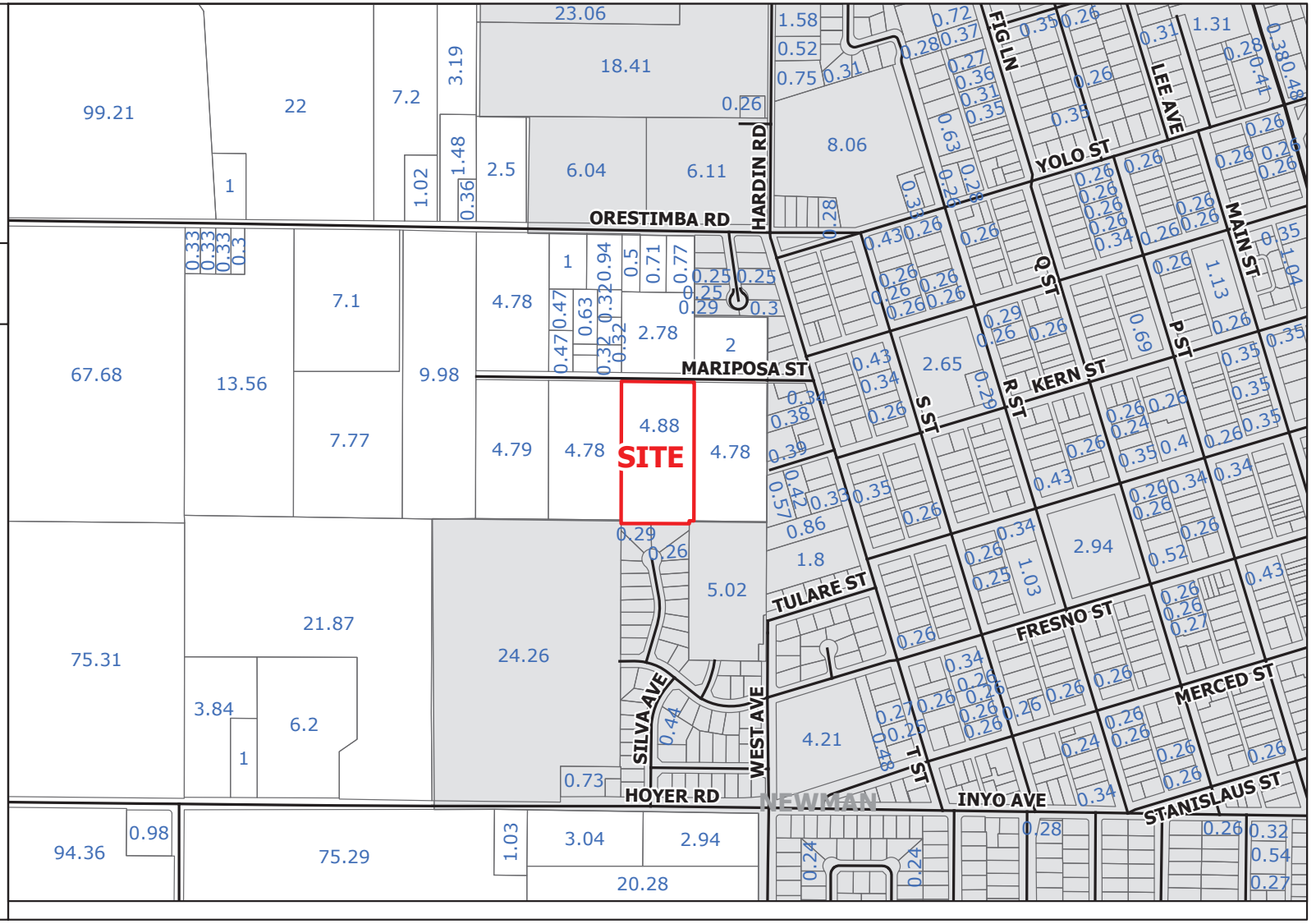
THE TOWERS

SAA PLN2025-0126

ACREAGE MAP

LEGEND

- Street
- Project Site
- Parcel



Source: Planning Department GIS Date Exported: 1/9/2026

THE TOWERS

SAA
PLN2025-0126

2023 AERIAL AREA MAP

LEGEND

- Project Site
- Parcel
- Street

N

0 500 1,000 US Feet

0 150 300 Meters

Source: Planning Department GIS Date Exported: 1/9/2026

THE TOWERS

SAA
PLN2025-0126

2023 AERIAL SITE MAP

LEGEND

- Project Site
- Parcel
- Street

N

0 90 180 US Feet

0 25 50 Meters

Source: Planning Department GIS

Date Exported: 1/9/2026

PROJECT DESCRIPTION:

CONSTRUCTION OF TELECOMMUNICATIONS AND PUBLIC UTILITY FACILITY, CONSISTING OF A 130' MONOPOLE WITH (3) 8' ANTENNAS, (3) 4' ANTENNAS, (3) 3' ANTENNAS, (3) RRU'S, (1) 2' MICROWAVE, (4) OVP BOXES, (1) GPS ANTENNA, REQUIRED ANTENNA CABLING, HCS JUMPERS, (2) GROUND MOUNTED RADIO CABINETS, (1) EQUIPMENT CANOPY, (1) FIBER BOX, (1) 200A ILC CABINET, (1) MANUAL SERVICE LIGHT SWITCH TIMER, (3) SERVICE LIGHTS, (1) BACK-UP DIESEL GENERATOR WITH 147 GALLONG DIESEL FUEL TANK, (4) RAISED CONCRETE PADS, CABLE ICE BRIDGE, UTILITY BACKBOARD AND MULTI-METER UTILITY SERVICE MOUNTED ON CONCRETE PAD WITHIN A 50'x50' 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

US-CA-6112 NEWMAN WEST

642 W MARIPOSA ST
NEWMAN, CA 95360

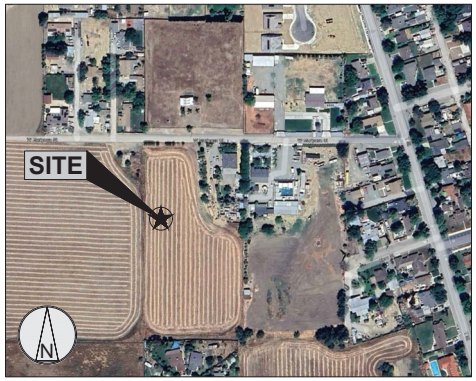
130' MONOPOLE

FUZE PROJECT NUMBER: 17574858

MDG LOCATION ID: 5000973132

VICINITY MAP
N.T.S.

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



LOCATION MAP
N.T.S.

PROJECT INFORMATION	
SITE NAME:	NEWMAN WEST
SITE NUMBER:	US-CA-6112
FUZE PROJECT NUMBER:	17574858
SITE ADDRESS:	642 W MARIPOSA ST NEWMAN, CA 95360
PARCEL #:	026-026-029
DEED REFERENCE:	N/A
ZONING CLASSIFICATION:	A-2-10: GENERAL AG 10 ACRE UT
ZONING JURISDICTION:	COUNTY OF STANISLAUS
CONSTRUCTION TYPE:	V-B
OCCUPANCY:	U (UNMANNED TELECOM FACILITY)
NO. OF STORIES:	1 (ENCLOSURE ONLY)
SPRINKLER:	NONE
STRUCTURE TYPE:	MONOPOLE
STRUCTURE HEIGHT:	130'
CONSTRUCTION AREA:	2,000 SQ. FT.
GROUND ELEVATION:	95.21' (NAVD88)
LATITUDE (NAD 83):	37.315825° (37° 18' 56.97" N)
LONGITUDE (NAD 83):	-121.033200° (121° 01' 59.52" 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:	RUBEN & ELIDA MONARREZ 642 W MARIPOSA ST NEWMAN, CA 95360
APPLICANT:	THE TOWERS, LLC 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:	PG&E
TELCO COMPANY:	AT&T

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	09/23/25	ISSUED FOR REVIEW	FV
0	11/24/25	ISSUED FOR ZONING	JR
1	12/30/25	PLANNING COMMENTS	JR

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

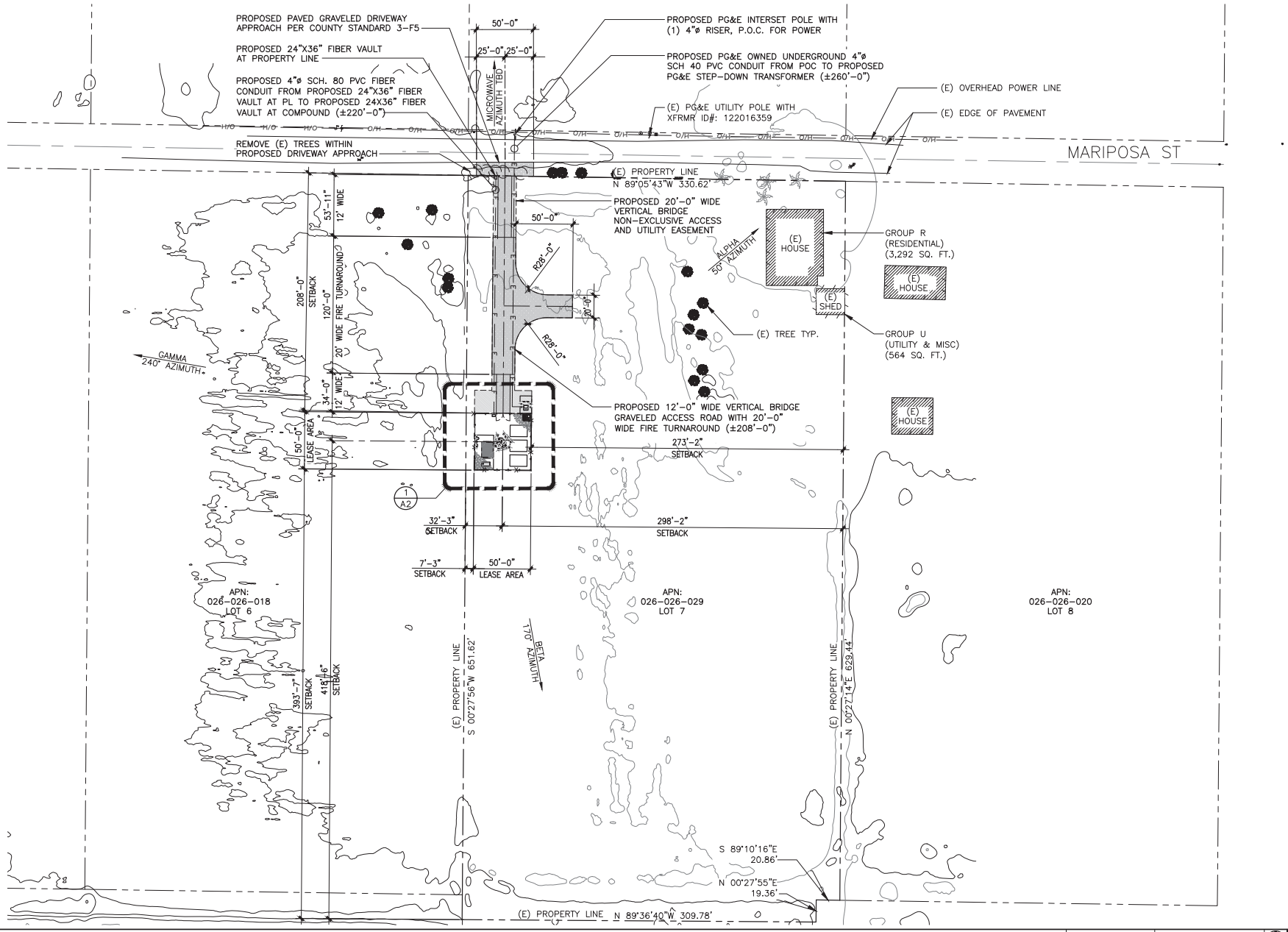
THE TOWERS, LLC
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

NEWMAN WEST
US-CA-6112
FUZE PROJECT ID: 17574858
MDG LOCATION ID: 5000973132
642 W MARIPOSA ST
NEWMAN, CA 95360

SHEET TITLE:
TITLE SHEET

T1



SITE PLAN

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

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	09/23/25	ISSUED FOR REVIEW	FV
0	11/24/25	ISSUED FOR ZONING	JR
1	12/30/25	PLANNING COMMENTS	JR

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

vertical bridge
THE TOWERS, LLC
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

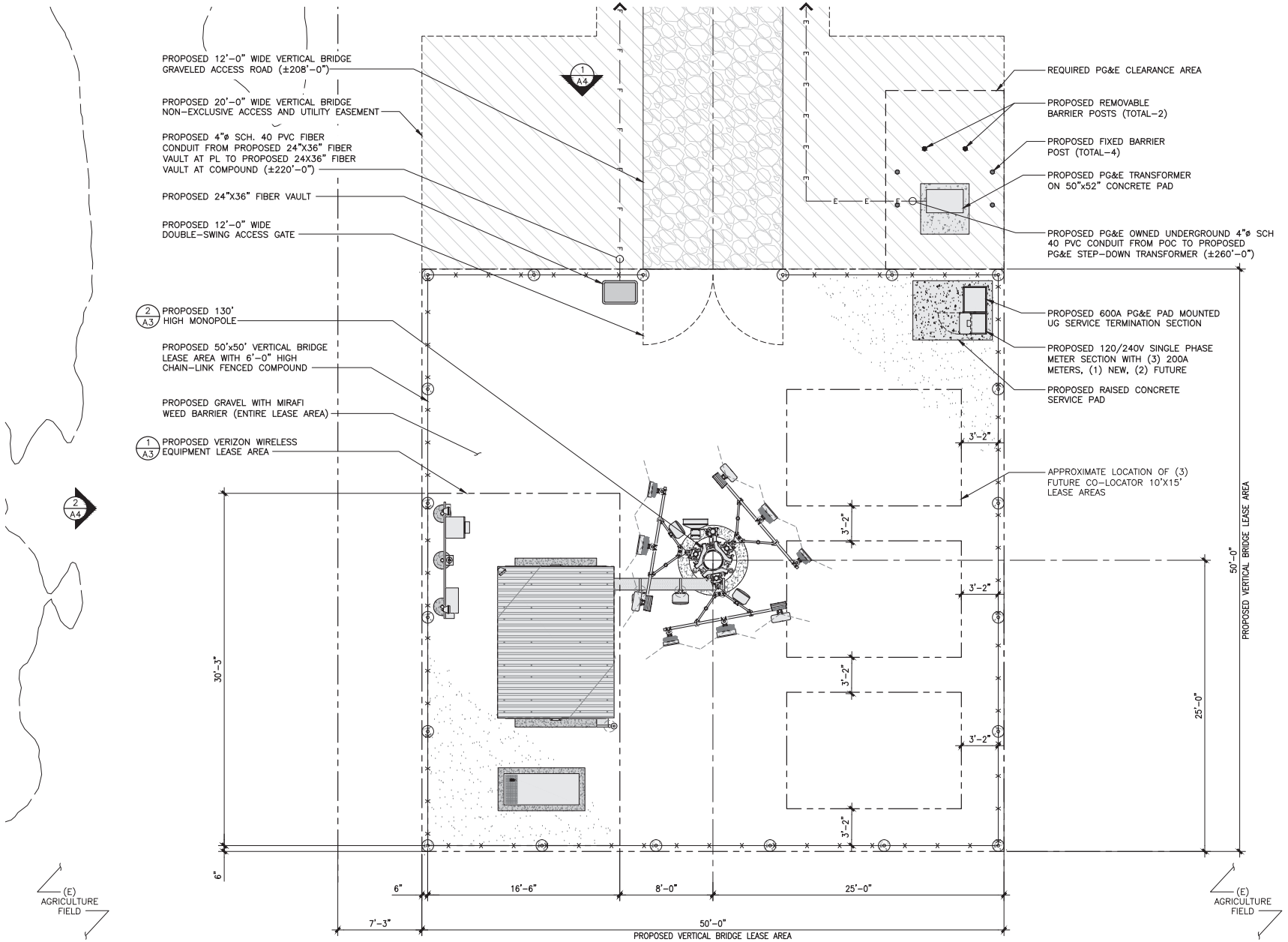
verizon
2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

NEWMAN WEST

US-CA-6112
FUZE PROJECT ID: 17574858
MDG LOCATION ID: 5000973132
642 W MARIPOSA ST
NEWMAN, CA 95360

SHEET TITLE:
SITE PLAN

A1



ENLARGED COMPOUND PLAN

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

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	09/23/25	ISSUED FOR REVIEW	FV
0	11/24/25	ISSUED FOR ZONING	JR
1	12/30/25	PLANNING COMMENTS	JR

ASSURANCE DEVELOPMENT
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626.765.5079

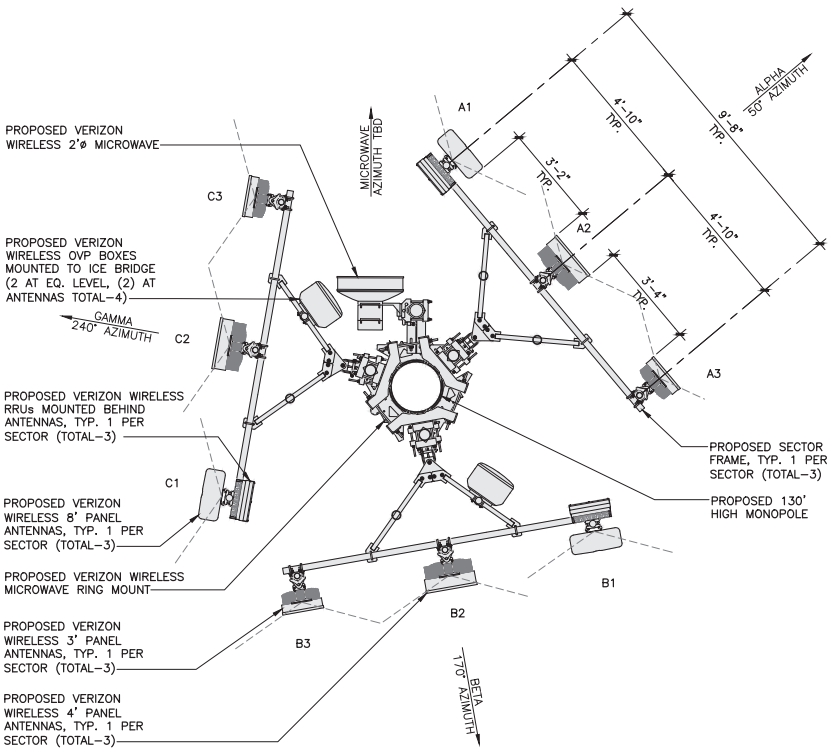
verticalbridge
THE TOWERS, LLC
22 W ATLANTIC AVE, #310
DELRAY BEACH, FL | 33444
561.406.4073

verizon
2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

NEWMAN WEST
US-CA-6112
FUZE PROJECT ID: 17574858
MDG LOCATION ID: 5000973132
642 W MARIPOSA ST
NEWMAN, CA 95360

SHEET TITLE:
ENLARGED COMPOUND PLAN

A2

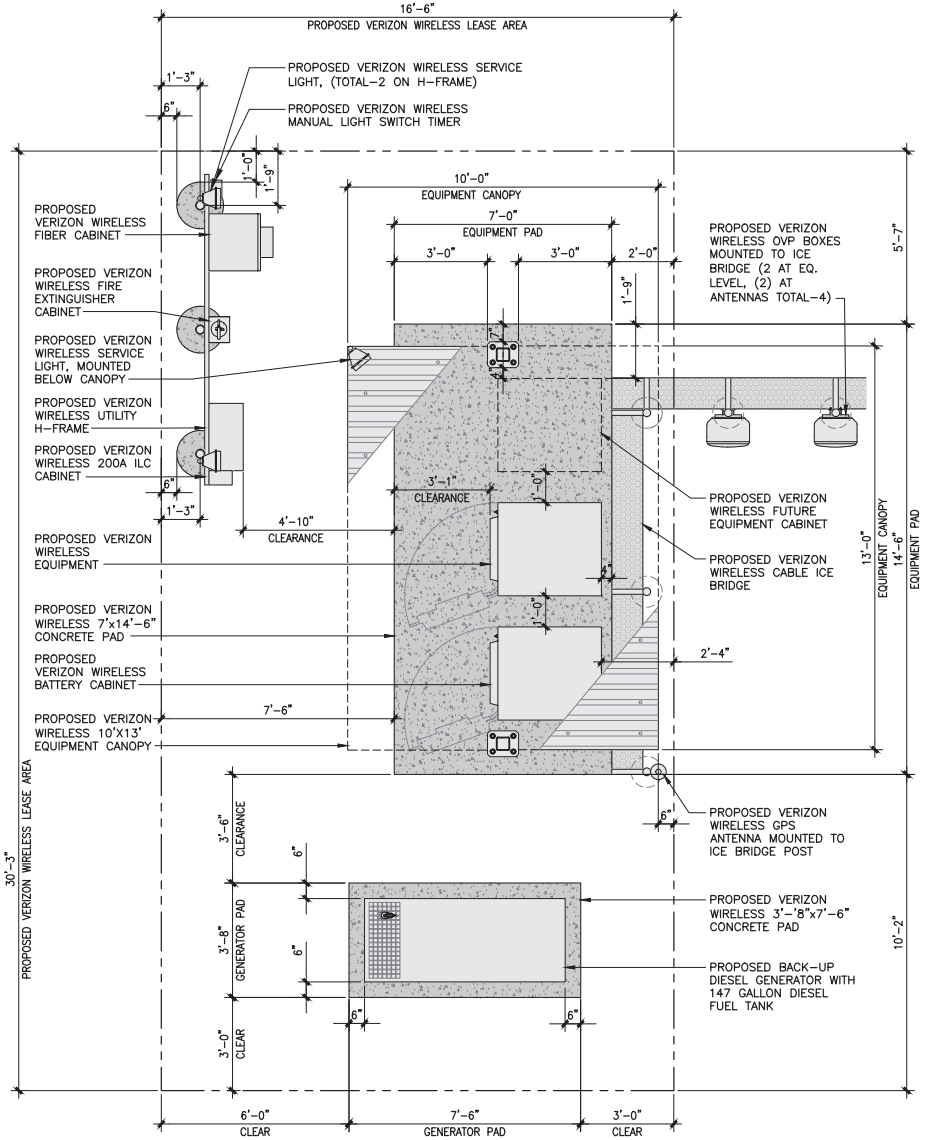


ANTENNA PLAN

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

2

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.



EQUIPMENT PLAN

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

1

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	09/23/25	ISSUED FOR REVIEW	FV
0	11/24/25	ISSUED FOR ZONING	JR
1	12/30/25	PLANNING COMMENTS	JR

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

vertical bridge
THE TOWERS, LLC
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DELRAY BEACH, FL | 33444
561.406.4073

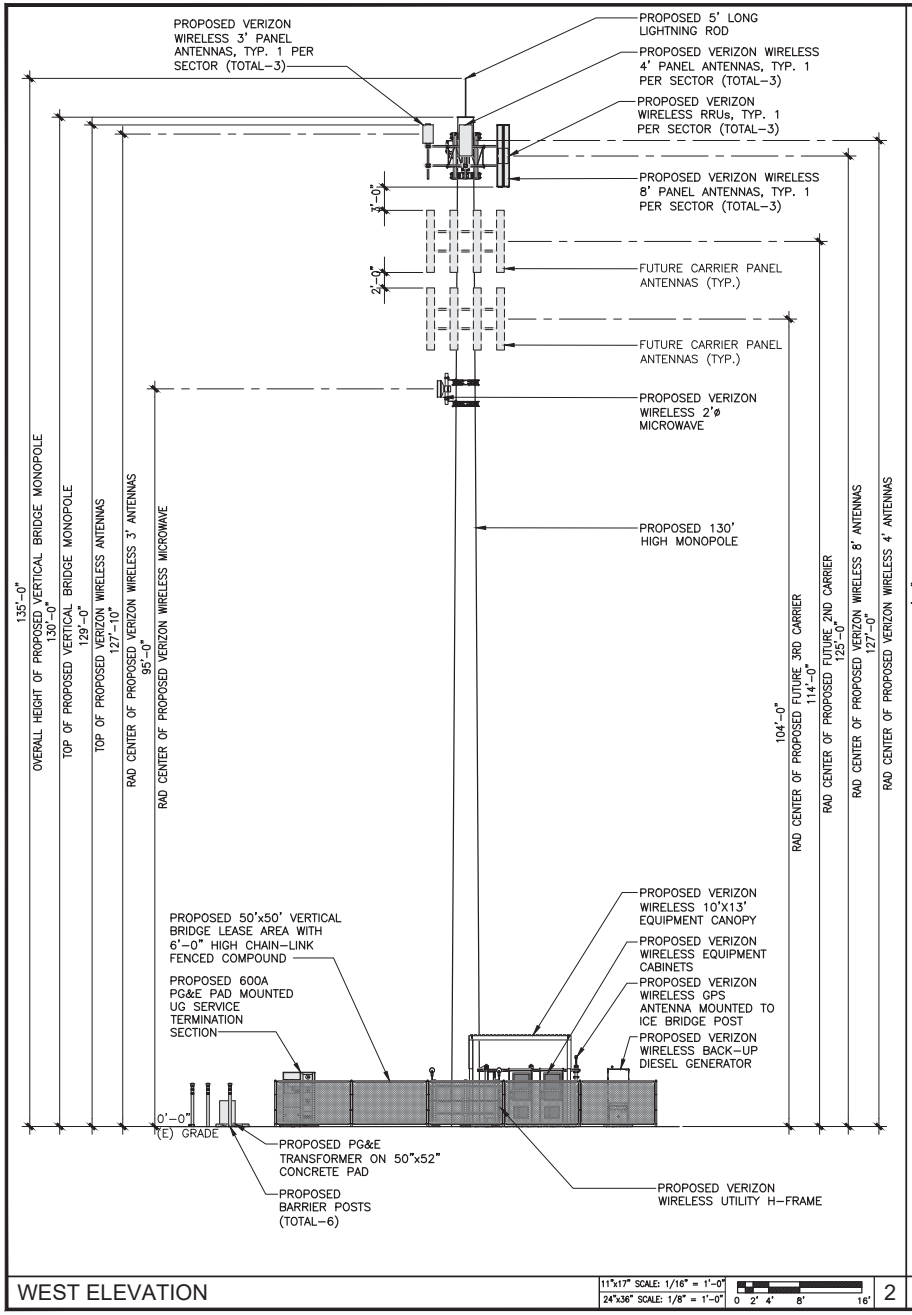
verizon
2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

NEWMAN WEST

US-CA-6112
FUZE PROJECT ID: 17574858
MDG LOCATION ID: 5000973132
642 W MARIPOSA ST
NEWMAN, CA 95360

SHEET TITLE:
EQUIPMENT AND ANTENNA PLAN

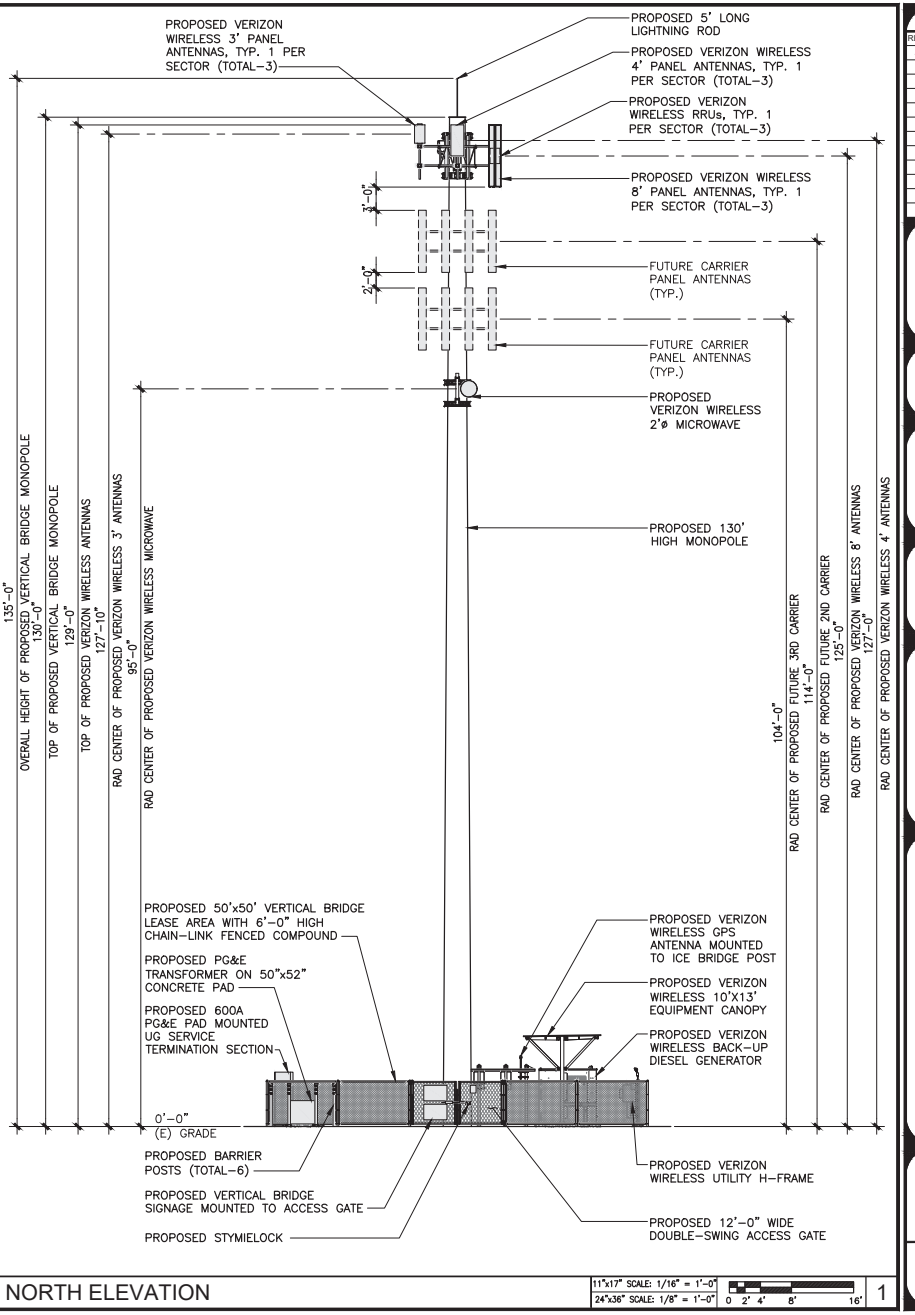
A3



WEST ELEVATION

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

2



NORTH ELEVATION

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

1

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	09/23/25	ISSUED FOR REVIEW	FV
0	11/24/25	ISSUED FOR ZONING	JR
1	12/30/25	PLANNING COMMENTS	JR

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verticalbridge
THE TOWERS, LLC
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561.406.4073

verizon
2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

NEWMAN WEST

US-CA-6112
FUZE PROJECT ID: 17574858
MDG LOCATION ID: 5000973132
642 W MARIPOSA ST
NEWMAN, CA 95360

SHEET TITLE:
ELEVATIONS

A4

AERIAL MAP

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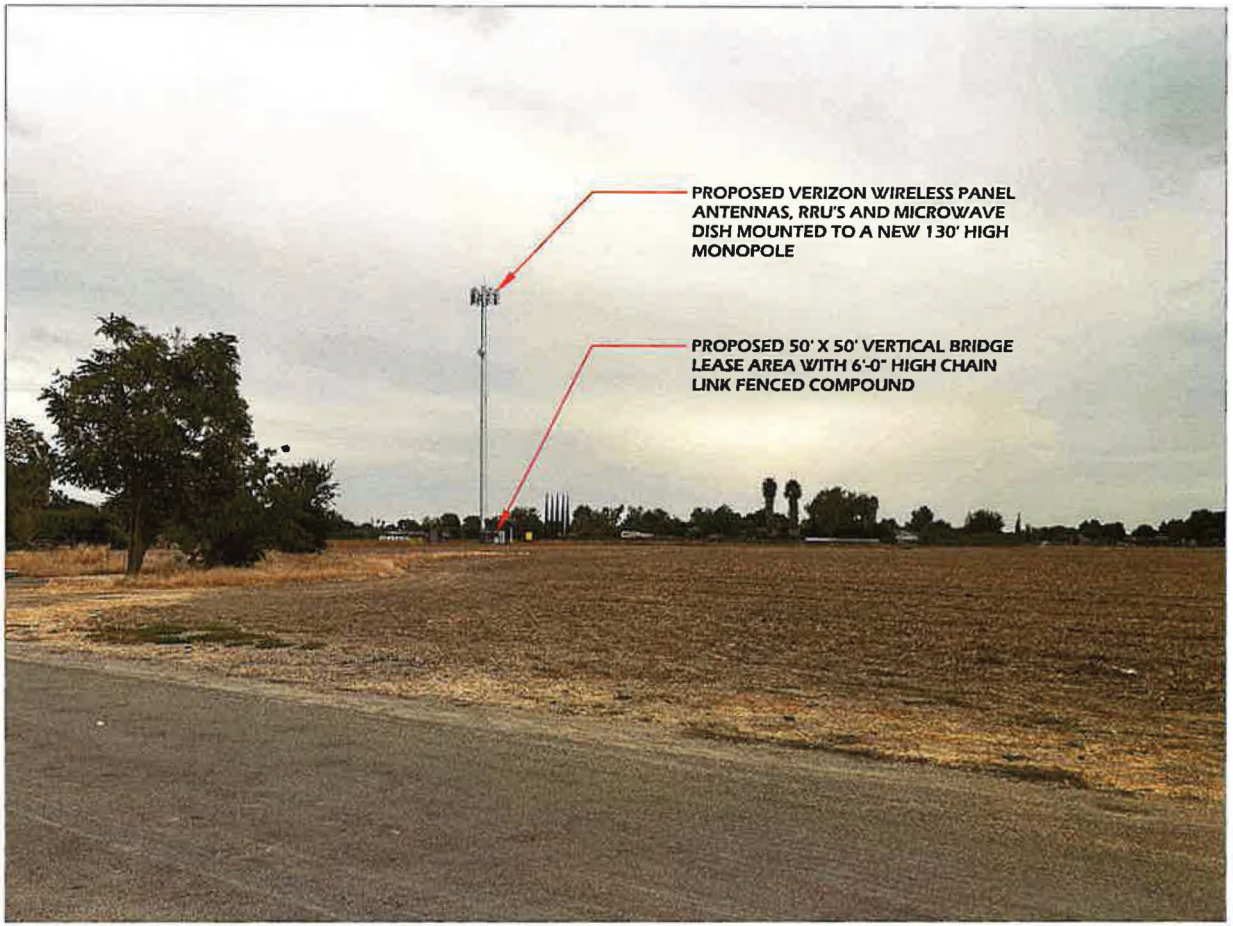
EXISTING

PROPOSED



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

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	10/28/25	ISSUED FOR SUBMITTAL	JFY

verizon vertical bridge

US-CA-6112
NEWMAN WEST
642 W MARIPOSA ST
NEWMAN, CA 95360

VIEW	SHEET
A	1 / 4

AERIAL MAP

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EXISTING

PROPOSED

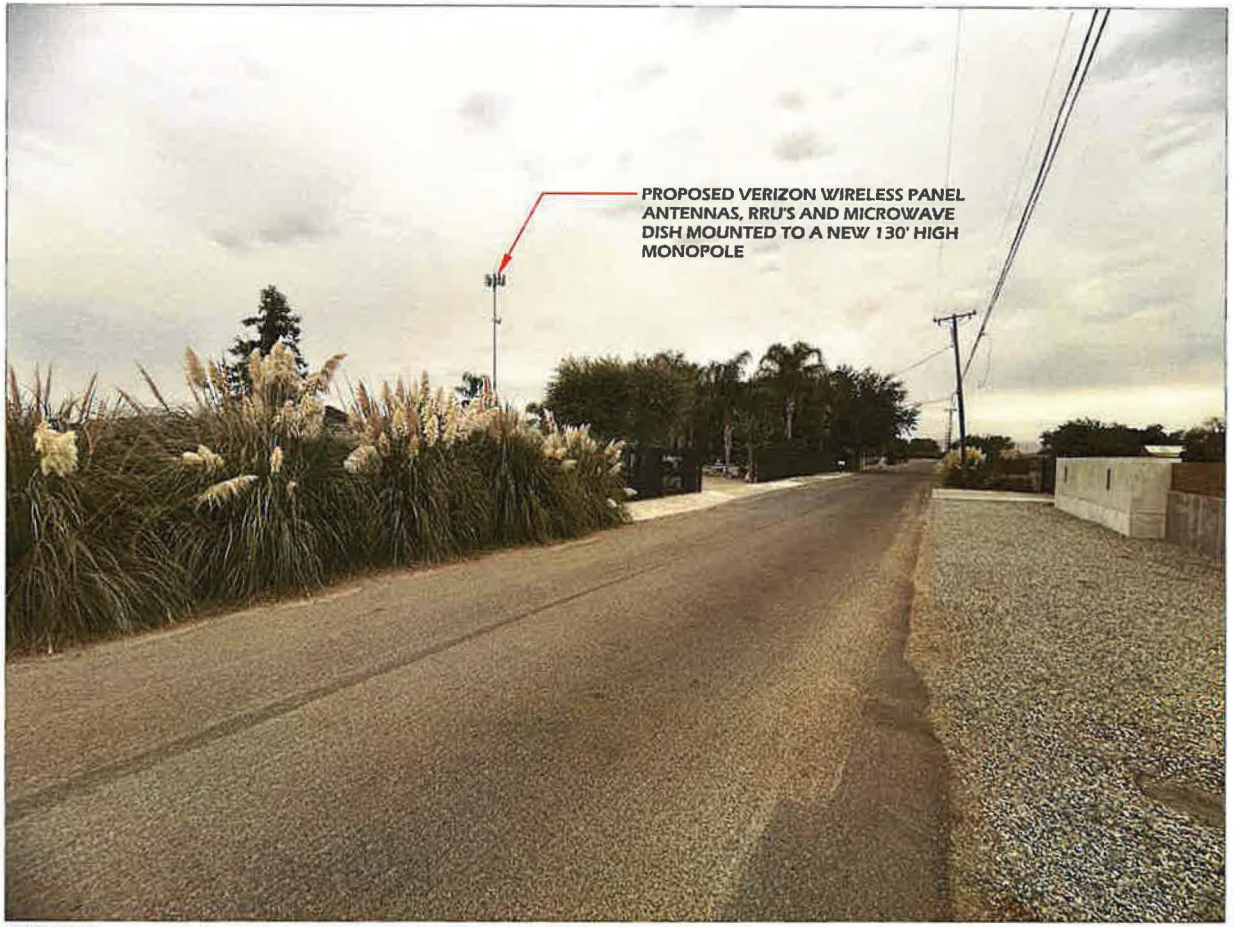

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PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK
CONTACT : JOYCE TU
EMAIL : JT@DRAFTLINK.COM
PHONE : 949.232.5095
WWW.DRAFTLINK.COM

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	10/28/25	ISSUED FOR SUBMITTAL	JFY

verizon vertical bridge

US-CA-6112
NEWMAN WEST
642 W MARIPOSA ST
NEWMAN, CA 95360

VIEW	SHEET
B	2 / 4

AERIAL MAP

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EXISTING

PROPOSED

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

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK
CONTACT : JOYCE YU
EMAIL : WWW.DRAFTLINK.COM
PHONE : 949.232.5015
WWW.DRAFTLINK.COM

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	10/28/25	ISSUED FOR SUBMITTAL	JFY

verizon vertical bridge

US-CA-6112
NEWMAN WEST
642 W MARIPOSA ST
NEWMAN, CA 95360

VIEW	SHEET
C	3 / 4

AERIAL MAP

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EXISTING

PROPOSED

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

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK
CONTACT : JOYCE YU
EMAIL : YU@DRAFTLINK.COM
PHONE : 949.232.5015
WWW.DRAFTLINK.COM

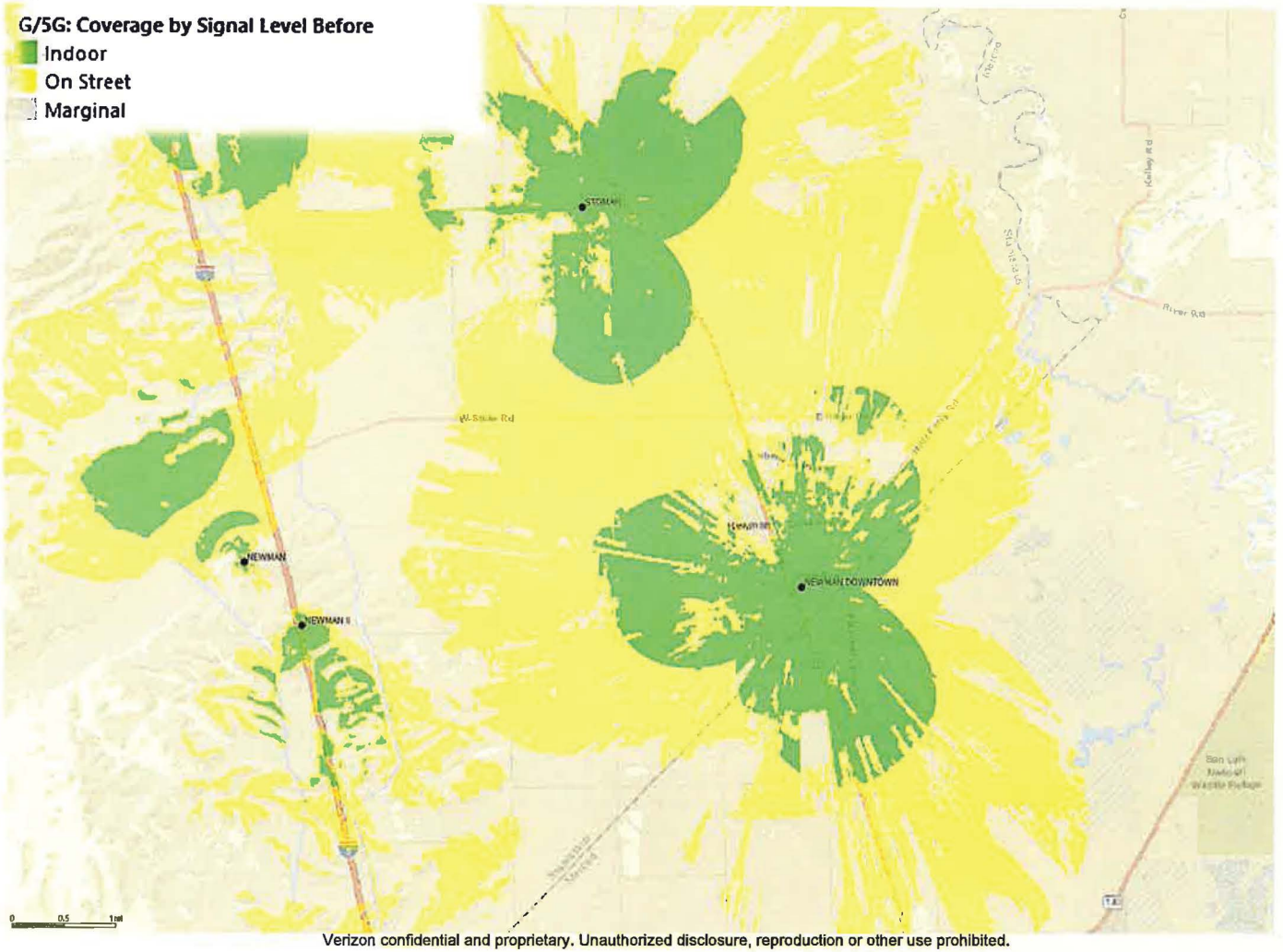
ASSURANCE DEVELOPMENT

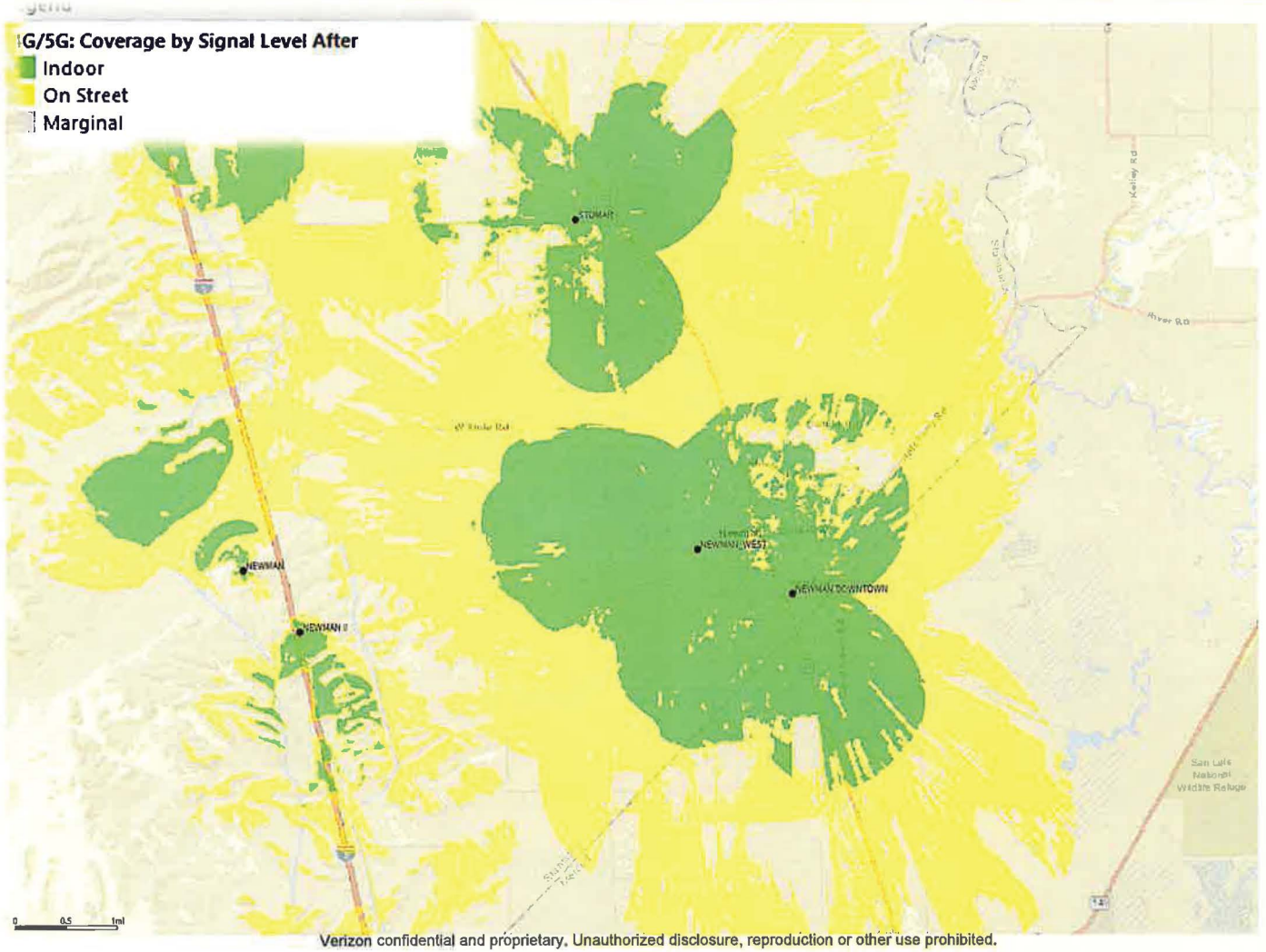
NO.	DATE	REVISIONS	BY
0	10/28/25	ISSUED FOR SUBMITTAL	JFY

verizon vertical bridge

US-CA-6112
NEWMAN WEST
642 W MARIPOSA ST
NEWMAN, CA 95360

VIEW	SHEET
D	4 / 4





ASSURANCE
DEVELOPMENT

Attachment 1

Project Narrative

PROJECT NARRATIVE
WCF STAFF APPROVAL PERMIT APPLICATION
US-CA-6112 Newman West

Submitted to County of Stanislaus, California
Planning Division

Applicant:	The Towers, LLC known in California as the Towers of California, LLC 22 W. Atlantic Ave Suite 310 Delray Beach, FL 33444 561-922-5688 Hubert.Kozlarzewski@verticalbridge.com
Co-Applicant:	Sacramento-Valley Limited Partnership ("Verizon") 1200 Concord Ave., Suite 500 Concord, CA 94520
Representative:	Assurance Development 1499 Huntington Dr. #305 South Pasadena, CA 91030 **Contact:** Phoebe Moffett 323-979-7914 pmoffett@assurance-group.com
Property-Owner:	Ruben & Elida Monarrez 642 W Mariposa St Newman, CA 95360
Project Address:	642 W Mariposa St Newman, CA 95360
Description & Tax Lot:	GPS Coordinates: 37.315825º / -121.033200º Parcel No. 026-026-029
Zoning Classification:	A-2-10

Assurance Development submits this application on behalf of The Towers of California, LLC ("The Towers, LLC") and Sacramento-Valley Limited Partnership ("Verizon"), collectively referred to as the "Applicants," and the underlying property owner.

The Towers, LLC specializes 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 Verizon, lease space on this infrastructure to house their equipment and offer wireless services to end users. Through strategic partnerships with wireless carriers, The Towers, LLC allows the opportunity for multiple carriers to collocate onto a single tower and reduces the physical footprint of wireless facilities in the community.

1. REQUEST

Applicants seek a review and approval of a Conditional Use Permit application for their proposed Wireless Communication Facility ("WCF"). Included with this application are the following documents for review (collectively, "Applicants' Application")

Attachment 1:	Project Narrative (this document)
Attachment 2:	Statement of Code Compliance
Attachment 3:	Staff Approval Permit Application Package
Attachment 4:	Owner Letter of Authorization
Attachment 5:	Zoning Drawings
Attachment 6:	Verizon Coverage Maps
Attachment 7:	Alternative Sites Analysis
Attachment 8:	Photo Simulations
Attachment 9:	EME Report
Attachment 10:	FCC License
Attachment 11:	Grant Deed
Attachment 12:	Title Report

2. PROJECT OVERVIEW

The Towers, LLC is proposing to build a new wireless telecommunications facility ("WCF" or "Facility"), US-CA-6112 Newman West, at the above noted project address for the colocation of Verizon's equipment. This Facility is intended to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Stanislaus County, more specifically within Newman.

As shown in Applicants' Application, this proposed project meets all applicable Stanislaus County Municipal Code 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 mean of meeting Verizon's coverage objectives for this site. Accordingly, the Applicants respectfully requests Stanislaus County to approve this project as proposed, subject only to Stanislaus County's standard conditions of approval.

3. PROPOSED PROJECT DETAILS

3.1. Location

Detailed information regarding the subject property and proposed lease area is included in **Attachment 5, Zoning Drawings**, to the Applicants' application.

3.1.1. Subject property. The subject property of this proposal is located at 642 W Mariposa Street in the County of Stanislaus (the "Property"). The Property is owned by Ruben & Elida Monarrez. The Property is zoned as A-2-10 and is currently used primarily for agricultural and residential purposes.

3.1.2. Lease area.

- The proposed 50 x 50 ft lease area for the WCF is located on the northern end of the property (the "Lease Area").
- The lease area will be surrounded by a 6ft chain link fence with access to the lease area secured by a locked gate.

3.1.3. Access and parking. Site will be accessed by a 12' wide and 208' long graveled access road. Parking will be available.

3.2. Wireless Facilities and Equipment

Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 5, Zoning Drawings**, to Applicants' Application.

3.2.1. Support structure design. Applicants are proposing to build a new 130 ft tall monopole (the "Pole") on the Property. This will be an unmanned wireless telecommunications facility.

3.2.2. Antennas and accessory equipment.

- The Pole will contain Verizon equipment with (3) 8' antennas, (3) 4' antennas, (3) 3' antennas, (3) RRU's, (1) 2' microwave, (4) OVP boxes, (1) GPS antenna, required antenna cabling, HCS jumpers.
- The antennas, RRHs, and accessory equipment on the Pole will be painted to match. All paint will have an anti-glare finish.
- Sufficient space will be made available on the Pole as required for future collocations. The proposed Verizon antenna centerline is 127 ft and the proposed Verizon antenna tip height is 129 ft.

3.2.3. Ground equipment.

- The ground equipment will include (2) Ground Mounted Radio Cabinets, (1) Equipment Canopy, (1) Fiber Box, (1) 200A ILC Cabinet, (1) Manual Service Light Switch Timer, (3) Service Lights, (1) Back-Up Diesel Generator, (4) Raised Concrete Pads, Cable

Ice Bridge, Utility Backboard And Multi-Meter Utility Service Mounted On Concrete Pad Within A 50'x50' Fenced Lease Area.

3.3. Additional Details

3.3.1. Lighting. The Pole will not be artificially illuminated, and no artificial lighting is required pursuant to state or federal authorities. There will be three service lights on site that will only be utilized during site visits or in case of an emergency, as seen on Sheet A3 of **Attachment 5, Zoning Drawings**.

3.3.2. Utilities. No water or sewer service is required. A proposed PG&E transformer will be added adjacent to the lease area. The proposed utility route is shown on Sheet A2 of **Attachment 5, Zoning Drawings**.

4. VERIZON NETWORK COVERAGE AND SERVICES

4.1. Overview—Verizon 4G & 5G Coverage

Verizon 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 Verizon 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 Verizon's 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the Facility will become part of Verizon's statewide and nationwide communications network. See **Attachment 6, Verizon Coverage Maps**.

3.2 Coverage Objectives for Proposed Facility

This proposed Facility meets Verizon's coverage objectives providing in-vehicle and in-building wireless coverage within a geographic area not adequately served by Verizon's network. Specifically, this facility is intended to increase coverage in Newman specifically along Mariposa Street. Verizon 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 6, Verizon Coverage Maps**).

5. SEARCH RING

Verizon'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, Verizon's 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 6, Verizon Coverage Maps**.

6. SITING ANALYSIS

Pursuant to the SCMS Code Section 21.90.040, Applicants evaluated alternative site locations, including collocation opportunities, within the targeted search ring possible locations for the proposed Facility. See **Attachment 7, Alternative Sites Analysis** for a summary of the alternative site locations analyzed.

7. APPLICABLE LAW

7.1. Local Codes

Pursuant to SCMC Section 21.91.020, new WCF support poles in the A-2-10 zone and are subject to a Staff Approval Permit and must comply with the criteria in Section 21.91.030. ***See* Attachment 2, Statement of Code Compliance** for Applicants' demonstration of compliance with the applicable code.

7.2. 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.

7.3. 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.

7.3.1. 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

[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.

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 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.

7.3.2. 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). The Applicants have included with this application a statement from Verizon's radio frequency engineer demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission's RF emissions regulations. *See* **Attachment 9, EME.** 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.

7.3.3. 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.

[3] Id. at ¶¶ 34-42.

7.3.4. 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 and all application notice and administrative appeal periods.

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

[4] 47 C.F.R. § 1.6002(g).

ASSURANCE
DEVELOPMENT

Attachment 9

EME Report

WATERFORD

Radio Frequency Emissions Compliance Report for Verizon Wireless

Site Name:	**NEWMAN_WEST**	**Site Structure Type:**	**Monopole**
Address:	**642 W Mariposa St**	**Latitude:**	**37.315838**
	Newman, CA 95360	**Longitude:**	**-121.033224**
Report Date:	**11/08/2025**	**Project:**	**Modification**

Compliance Statement

Based on information provided by Verizon and predictive modeling, the **NEWMAN_WEST** installation proposed by Verizon will be compliant with Radiofrequency Radiation Exposure Limits of 47 C.F.R. §§ 1.1307(b)(3) and 1.1310. RF alerting signage and restricting access to the antenna to authorized personnel that have completed RF safety training is required for Occupational environment compliance. The proposed operation will not expose members of the General Public to hazardous levels of RF energy at ground level or in adjacent buildings.

Certification

I, Tim Alexander, am the reviewer and approver of this report and am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation, specifically in accordance with FCC's OET Bulletin 65. I have reviewed this Radio Frequency Exposure Assessment report and believe it to be both true and accurate to the best of my knowledge.

SIGNED, 14 NOV 2025

General Summary

The compliance framework is derived from the Federal Communications Commission (FCC) Rules and Regulations for preventing human exposure in excess of the applicable Maximum Permissible Exposure ("MPE") limits. At any location at this site, the power density resulting from each transmitter may be expressed as a percentage of the frequency-specific limits and added to determine if 100% of the exposure limit has been exceeded. The FCC Rules define two tiers of permissible exposure differentiated by the situation in which the exposure takes place and/or the status of the individuals who are subject to exposure. General Population / Uncontrolled exposure limits apply to those situations in which persons may not be aware of the presence of electromagnetic energy, where exposure is not employment-related, or where persons cannot exercise control over their exposure. Occupational / Controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment, have been made fully aware of the potential for exposure, and can exercise control over their exposure. Based on the criteria for these classifications, the FCC General Population limit is considered to be a level that is safe for continuous exposure time. The FCC General Population limit is 5 times more restrictive than the Occupational limits.

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Table 1: FCC Limits

Frequency (MHz)	*Limits for General Population/ Uncontrolled Exposure*		*Limits for Occupational/ Controlled Exposure*	
	Power Density (mW/cm^2)	Averaging Time (minutes)	Power Density (mW/cm^2)	Averaging Time (minutes)
30-300	0.2	30	1	6
300-1500	f/1500	30	f/300	6
1500-100,000	1.0	30	5.0	6

f=Frequency (MHz)

In situations where the predicted MPE exceeds the General Population threshold in an accessible area as a result of emissions from multiple transmitters, FCC licensees that contribute greater than 5% of the aggregate MPE share responsibility for mitigation.

Based on the computational guidelines set forth in FCC OET Bulletin 65, Waterford Consultants, LLC has developed software to predict the overall Maximum Permissible Exposure possible at any location given the spatial orientation and operating parameters of multiple RF sources. The power density in the Far Field of an RF source is specified by OET-65 Equation 5 as follows:

$$S = \frac{EIRP}{4 \cdot \pi \cdot R^2} \ (\mathrm{mW/cm^2})$$

Where EIRP is the Effective Radiated Power relative to an isotropic antenna and R is the distance between the antenna and point of study. Additionally, consideration is given to the manufacturers' horizontal and vertical antenna patterns as well as radiation reflection. At any location, the predicted power density in the Far Field is the spatial average of points within a 0 to 6-foot vertical profile that a person would occupy. Near field power density is based on OET-65 Equation 20 stated as

$$S = \left(\frac{180}{\theta_{BW}}\right) \cdot \frac{100 \cdot P_{in}}{\pi \cdot R \cdot h} \ (\mathrm{mW/cm^2})$$

Where P_{in} is the power input to the antenna, θ_{BW} is the horizontal pattern beamwidth and h is the aperture length.

Some antennas employ beamforming technology where RF energy allocated to each customer device is dynamically directed toward their location. In the analysis presented herein, predicted exposure levels are based on all beams at full utilization (i.e. full power) simultaneously focused in any direction. As this condition is unlikely to occur, the actual power density levels at ground and at adjacent structures are expected to be less that the levels reported below. These theoretical results represent maximum-case predictions as all RF emitters are assumed to be operating at maximum duty cycle.

For any area in excess of 100% General Population MPE, access controls with appropriate RF alerting signage must be put in place and maintained to restrict access to authorized personnel. Signage must be posted to be visible upon approach from any direction to provide notification of potential conditions within these areas. Subject to other site security requirements, occupational personnel should be trained in RF safety and equipped with personal protective equipment (e.g. RF personal monitor) designed for safe work in the vicinity of RF emitters. Controls such as physical barriers to entry imposed by locked doors, hatches and ladders or other access control mechanisms may be supplemented by alarms that alert the individual and notify site management of a breach in access control. Waterford Consultants, LLC recommends that any work activity in these designated areas or in front of any transmitting antennas be coordinated with all wireless tenants.

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Analysis

SCOPE:

- **INSTALL (3) AIR3283 RADIO/ANTENNA**
- **INSTALL (3) AIR6419 RADIO/ANTENNA**
- **INSTALL (3) NN-65C-HG-R1B ANTENNA**
- **INSTALL (3) 4490 RADIO**

The antennas will be mounted on a 130' Monopole with centerlines at (125', 127', and 127.8') above ground level. Proposed antenna operating parameters are listed in Appendix A. Other appurtenances such as GPS antennas, RRUs and hybrid cable below the antennas are not sources of RF emissions. No other antennas are known to be operating in the vicinity of this site.

Figure 1: Antenna Locations

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Power density decreases significantly with distance from any antenna. The antennas to be employed at this site are highly directional by design and the orientation in azimuth and mounting elevation, as documented, serves to reduce the potential to exceed MPE limits at any location other than directly in front of the antennas. For accessible areas at ground level and incident at adjacent structures, the maximum predicted RF power density level resulting from all operations is depicted in Figure 2. The proposed operations will not expose members of the public to hazardous levels of RF energy at ground level or in adjacent buildings

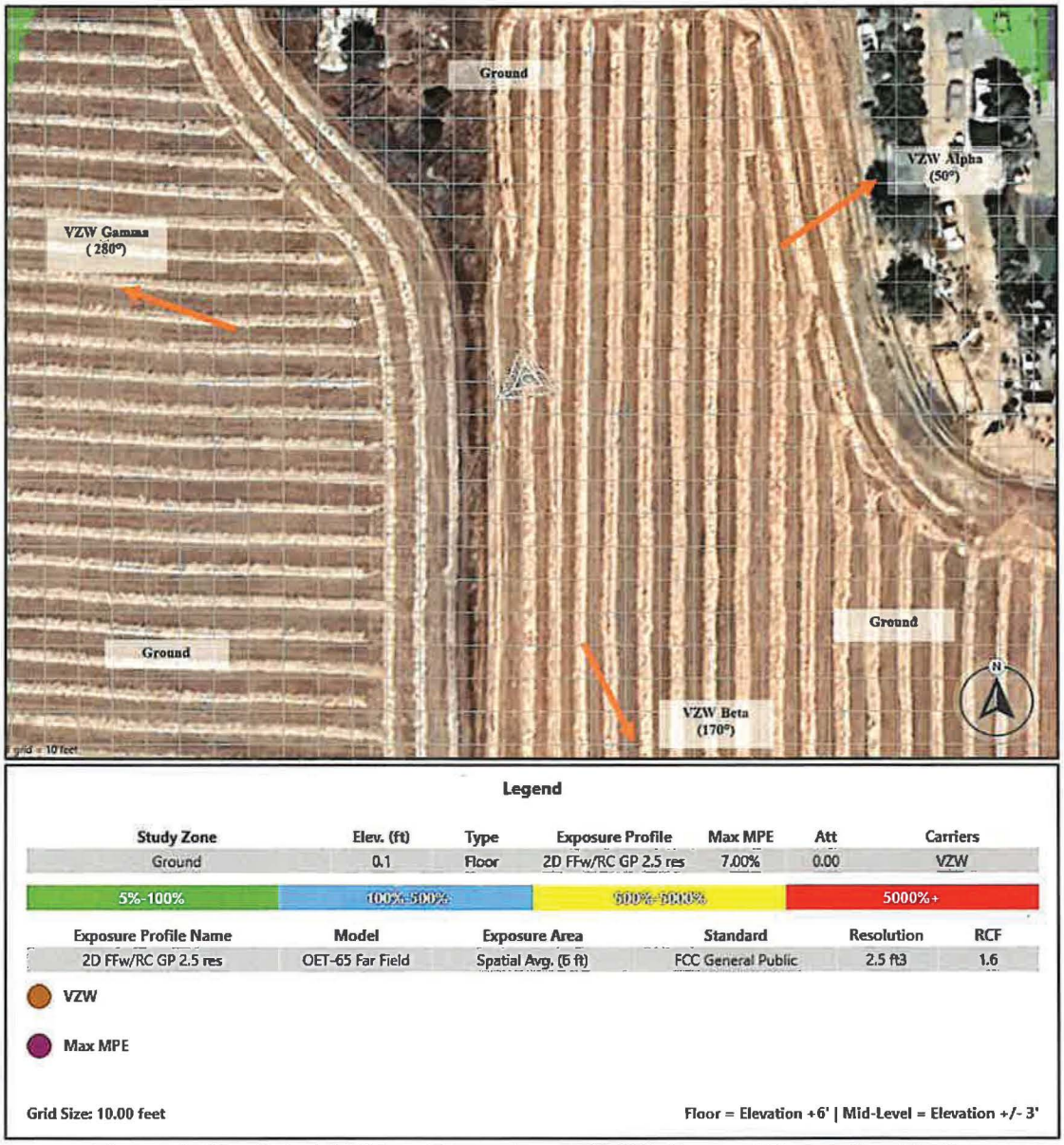

Figure 2: Predicted MPE as Percentage of FCC General Population Limits

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Figure 3 shows predicted MPE levels near the antennas. Waterford Consultants, LLC recommends no RF alerting signage is necessary due to emissions not exceeding General Population limits at the ground level. This recommendation is depicted in Figure 4. Any work activity in front of transmitting antennas should be coordinated with Verizon.

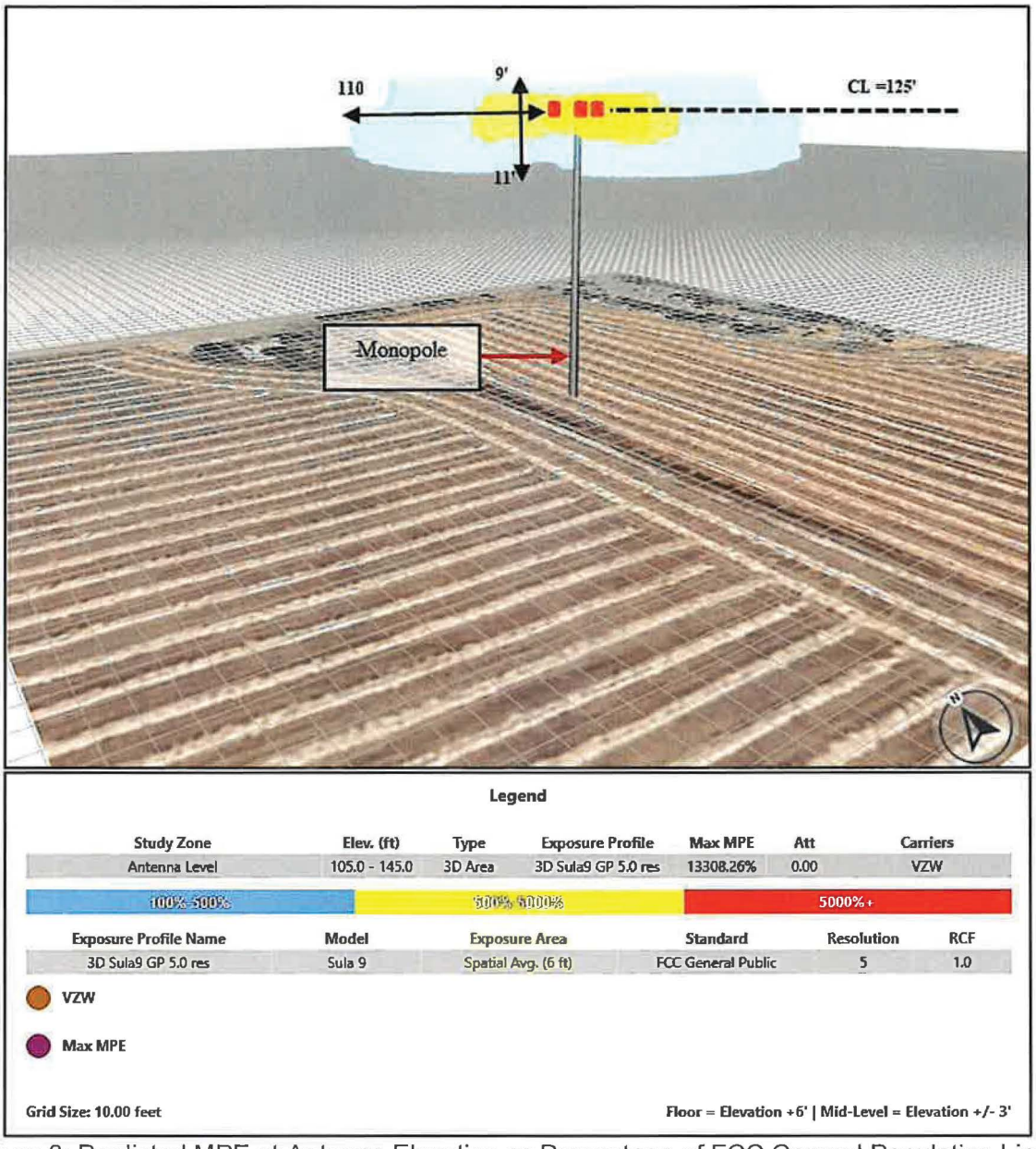

Figure 3: Predicted MPE at Antenna Elevation as Percentage of FCC General Population Limits

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Compliance Requirement Diagram

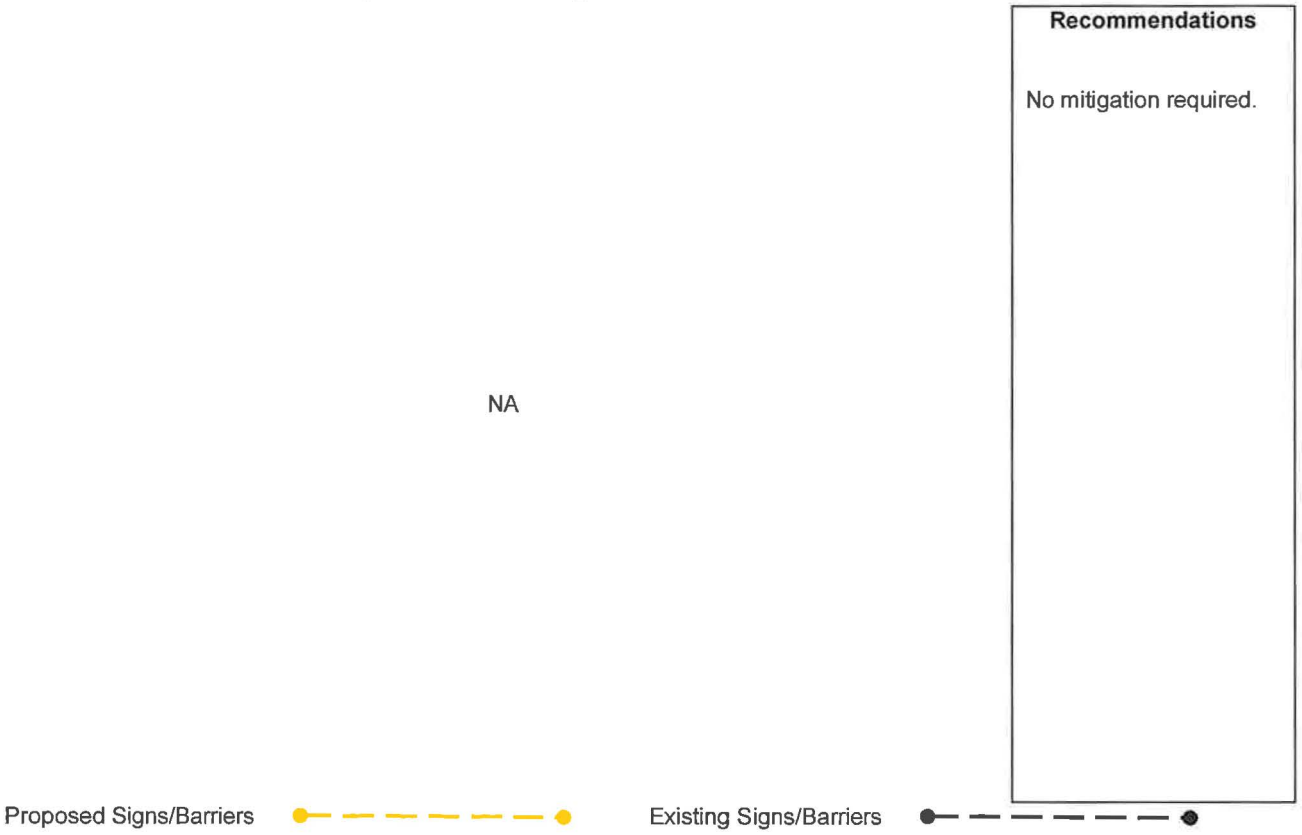

Figure 4: Mitigation Recommendations

Appendix A: Operating Parameters Considered in this Analysis

ID Sub														
ID	Carrier NAME	Antenna Model	MDT (°)	Az (°)	Freq Band	EDT (°)	HBW (°)	VBW (°)	Paths	Transmit Power (W)	Total Power (W)	Gain (dBd)	ERP (W)	Ground
A1	Verizon	SON_NN-65C-HG-R1B	0	50	700	SON	74	19	4	60	213.90	13.74	5060.69	125
A1	Verizon	SON_NN-65C-HG-R1B	0	50	850	SON	68	17	4	60	213.90	13.96	5323.66	125
A2	Verizon	SON_AIR3283	0	50	1900	SON	69	17	32	5	160.00	14.48	4488.69	127
A2	Verizon	SON_AIR3283	0	50	2100	SON	67	15	32	2.5	80.00	15.01	2535.65	127
A2	Verizon	SON_AIR3283	0	50	2100_3	SON	67	15	32	2.5	80.00	15.01	2535.65	127
A3	Verizon	SON_AIR6419	0	50	3700	SON	11	25	64	5	320.00	23.45	70818.96	127.8
B1	Verizon	SON_NN-65C-HG-R1B	0	170	700	SON	74	19	4	60	213.90	13.74	5060.69	125
B1	Verizon	SON_NN-65C-HG-R1B	0	170	850	SON	68	17	4	60	213.90	13.96	5323.66	125
B2	Verizon	SON_AIR3283	0	170	1900	SON	69	17	32	5	160.00	14.48	4488.69	127
B2	Verizon	SON_AIR3283	0	170	2100	SON	67	15	32	2.5	80.00	15.01	2535.65	127
B2	Verizon	SON_AIR3283	0	170	2100_3	SON	67	15	32	2.5	80.00	15.01	2535.65	127
B3	Verizon	SON_AIR6419	0	170	3700	SON	11	25	64	5	320.00	23.45	70818.96	127.8
G1	Verizon	SON_NN-65C-HG-R1B	0	280	700	SON	74	19	4	60	213.90	13.74	5060.69	125
G1	Verizon	SON_NN-65C-HG-R1B	0	280	850	SON	68	17	4	60	213.90	13.96	5323.66	125
G2	Verizon	SON_AIR3283	0	280	1900	SON	69	17	32	5	160.00	14.48	4488.69	127
G2	Verizon	SON_AIR3283	0	280	2100	SON	67	15	32	2.5	80.00	15.01	2535.65	127
G2	Verizon	SON_AIR3283	0	280	2100_3	SON	67	15	32	2.5	80.00	15.01	2535.65	127
G3	Verizon	SON_AIR6419	0	280	3700	SON	11	25	64	5	320.00	23.45	70818.96	127.8