



COUNTY OF SAN DIEGO

LAND USE AGENDA ITEM

BOARD OF SUPERVISORS

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DATE: June 25, 2025

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TO: Board of Supervisors

SUBJECT

APPEAL OF PARADISE VALLEY ROAD WIRELESS TELECOMMUNICATION FACILITY MAJOR USE PERMIT AND CEQA EXEMPTION (DISTRICT: 1)

OVERVIEW

This is a request for the Board of Supervisors (Board) to consider an appeal submitted by a resident on behalf of Sweetwater Hills Townhomes (Appellant) of the Planning Commission's approval of the Major Use Permit (MUP) and associated environmental findings for the proposed Paradise Valley Road Wireless Telecommunication Facility project (Project). The Project is a request submitted by AT&T (Applicant) to construct, maintain, and operate a new wireless telecommunication facility on an approximately three-acre property located at 8555 Paradise Valley Road in the Spring Valley Community Plan Area, leased from the San Diego County Water Authority.

The proposed wireless facility would include 12 panel antennas mounted to a new 35-foot-tall faux mono-eucalyptus tree and supporting equipment located within the adjacent equipment enclosure. The Project will enhance telecommunications infrastructure in the Spring Valley community, improving network coverage and supporting increasing connectivity demands. The facility's design, including a 35-foot-tall mono-eucalyptus, integrates with the surrounding landscape to minimize visual impacts and maintain community character. The Project complies with all applicable County setbacks and zoning requirements and aligns with the General Plan and the Spring Valley Community Plan. The Project meets all County regulations and environmental standards, and complies with the California Environmental Quality Act (CEQA) as no significant environmental impacts were identified.

On April 19, 2024, the Planning Commission denied the original application due to a lack of quorum, as it failed to secure the required minimum of four votes for approval. During the 10-day appeal period, the applicant submitted an appeal application on April 29, 2024, with intentions to submit a revised plot plan to address community concerns. The revised plot plan, submitted October 24, 2024, relocated the wireless telecommunications tower 11.5 feet to the east within the same project site in response to community feedback regarding the facility's proximity to

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neighboring residences (Attachment I). Under Section 7366(b) of the County Zoning Ordinance, the appeal process to the Board was terminated, and the revised application was referred back to the Planning Commission for a decision.

The Project was then approved by the Planning Commission on February 28, 2025. A decision of the Planning Commission is appealable to the Board, and a formal appeal must be submitted within 10 calendar days of the Planning Commission decision. The Planning Commission's approval of the Project has been appealed by a resident on behalf of Sweetwater Hills Townhomes (Attachment A) and the appeal application was submitted on March 10, 2025. The appeal cites four main concerns, and staff's responses to each point are included in this Board letter. The appellant claims:

1. Improper CEQA Exemption
2. Lack of Justification for Coverage Needs
3. Inconsistent Setback Policies
4. Precedents in Other Communities

Staff has analyzed all points of appeal and has determined that they have been addressed through the MUP findings made for the Project and consistency findings with the San Diego County General Plan and Spring Valley Community Plan. The Project has been reviewed for compliance with CEQA and it is determined that the proposed project qualifies for a categorical exemption under CEQA Section 15303. Staff also determined that the Project meets the intent and specific standards and criteria established in the County of San Diego's (County) Zoning Ordinance.

The Board can: (1) deny the appeal and sustain the Planning Commission's decision to approve the MUP, (2) grant the appeal and deny the MUP, or (3) continue the appeal and send the MUP back to staff for additional environmental analysis and/or reconsideration, including any additional direction from the Board, and return to the Board within a specified time period. If any motion does not get three votes, then the appeal is deemed denied, unless reconsideration is requested by one of the Board members after the hearing.

RECOMMENDATION(S)

PLANNING COMMISSION

On February 28, 2025, the Planning Commission considered the Paradise Valley Road Wireless Telecommunication Facility project and made the following decisions:

1. Adopted the Environmental Findings, which includes a finding that the Project is exempt from the California Environmental Quality Act (CEQA) (CEQA) pursuant to State CEQA Guidelines section 15303 (Attachments B and H, on file with the Clerk of the Board).
2. Granted Major Use Permit PDS2022-MUP-22-012, made the findings, and included the requirements and conditions as set forth in the Form of Decision (Attachment C).

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DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES

Planning & Development Services (PDS) concurs with the decision of the Planning Commission and recommends the Board of Supervisors (Board):

1. Deny the appeal for the reasons discussed in this Board Letter.
2. Adopt the Environmental Findings, which includes a finding that the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines section 15303 (Attachment B).
3. Sustain the Planning Commission's decision to Grant Major Use Permit PDS2022-MUP-22-012, make the findings, and include the requirements and conditions as set forth in the Form of Decision (Attachment C).
4. Require MD7, LLC, as agent for AT&T Mobility, to enter into a standard Defense and Indemnification Agreement with the County of San Diego (County) in accordance with County Code Section 86.201 et seq. and authorize the Director of PDS to execute the Agreement. If litigation is filed challenging the Board's action on the Project, require MD7, LLC, as agent for AT&T Mobility, to provide security in the amount of \$500,000 in the form of an irrevocable letter of credit or bond (whichever is acceptable to County Counsel) within 10 days of litigation being filed (Attachment D).

EQUITY IMPACT STATEMENT

The appeal process allows the community to participate in decisions that impact their community. The appellants view the proposed wireless facility as inequitable, arguing it unfairly impacts their community with unnecessary risks, despite independent data showing adequate coverage. The Applicant provided an Alternative Site Analysis (ASA) in accordance with county standards, which illustrates existing coverage gaps within the area. The Applicant demonstrated in the ASA that the facility would close a gap in area coverage. The proposed wireless telecommunication facility would enhance critical infrastructure by improving network connectivity, supporting public safety, and ensuring reliable communication services. Strengthening telecommunication access contributes to digital equity, particularly in underserved areas with network coverage gaps. The Project aligns with the County's infrastructure goals by enhancing service reliability while adhering to zoning regulations and environmental requirements. Additionally, construction and ongoing maintenance of the facility would generate local employment opportunities, supporting economic growth within the region.

SUSTAINABILITY IMPACT STATEMENT

The Project incorporates multiple sustainability considerations, including the strategic placement of the wireless facility to minimize visual and environmental impacts while improving telecommunications infrastructure for public benefit. The design of the facility integrates a camouflaged mono-eucalyptus structure to blend with the natural landscape, reducing aesthetic disruption. The equipment enclosure is constructed with durable materials that align with existing site structures, ensuring longevity and reduced maintenance needs. Additionally, the Project supports regional sustainability by enhancing emergency response capabilities and public safety through improved network coverage. The site selection process prioritized minimizing land

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disturbance by utilizing an existing developed property, thereby avoiding impacts to undisturbed natural habitats. Additionally, the Project aligns with the County's environmental policies by adhering to CEQA guidelines, maintaining compliance with zoning regulations, and aligning with the General Plan.

FISCAL IMPACT

There is no fiscal impact associated with the approval of the recommendations for the Paradise Valley Road Wireless Telecommunication Facility Project, as the Project is privately initiated and is leased on a San Diego County Water Authority property. Any costs incurred will be paid for by the applicant (or owner/developer). There will be no change in net General Fund costs and no additional staff years.

BUSINESS IMPACT STATEMENT

N/A

ADVISORY BOARD STATEMENT

The Project is located within the Spring Valley Community Planning Area, which is represented by the Spring Valley Community Planning Group (CPG).

On February 14, 2023, the Spring Valley CPG reviewed the project and voted on the Major Use Permit (MUP), resulting in a 6-6-1-2 vote (6 in favor, 6 opposed, 1 abstention, and 2 vacant/absent). The motion did not carry. Comments made by the group on the proposed project include public concerns regarding potential health risks and a lack of community outreach. The group was asked if they wished to revote on the project at a later date, but declined. Staff clarified that no changes had been made to the proposed wireless facility since its initial review.

On April 19, 2024, the Planning Commission denied the original application, starting a 10-day appeal period. The applicant submitted an appeal on April 29, 2024. A revised site plan was submitted on October 24, 2024. Staff notified the CPG of these updates on October 29, 2024, but the group again declined to revote on the project before the Planning Commission's appeal hearing.

On February 28, 2025, the Planning Commission approved the revised application. Subsequently, on March 10, 2025, a resident on behalf of Sweetwater Hills Townhomes filed an appeal on behalf of the residents of Sweetwater Hills Townhomes. Staff notified the CPG of this appeal on March 14, 2025, and asked if they wished to discuss and vote on it. The group declined to revote on the project before the Board of Supervisors appeal hearing.

INVOLVED PARTIES

MD7, LLC, on behalf of AT&T (Applicant)

San Diego County Water Authority (Owner)

See Ownership Disclosure in Attachment F

A resident on behalf of Sweetwater Hills Townhomes (Appellant)

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PLANNING COMMISSION VOTE

On April 19, 2024, the Planning Commission voted 3-1-1-0-1-1 (Ayes: Ashman, Edwards, and Pallinger; Noes: Hitzke; Absent: Calvo; Abstain: 0; Recused: Barnhart; Vacant: 1) to approve the Paradise Valley Road Wireless Telecommunication Facility project, which did not meet the necessary minimum four votes for approval and was therefore denied.

On February 28, 2025, the Planning Commission voted 4-0-1-0-1 (Ayes: Ashman, Edwards, Calvo, and Pallinger; Noes: 0; Absent: Weber; Abstain: 0; Recused: Barnhart; Vacant: 1) to approve the Paradise Valley Road Wireless Telecommunication Facility project.

See Attachment G, Planning Commission Report and Action Sheet, for the Planning Commission vote and recommendation.

BACKGROUND

An application for the proposed Paradise Valley Road Wireless Telecommunication Facility (Project) was submitted by MD7, LLC, on behalf of AT&T (Applicant) on November 22, 2022. The Project is a Major Use Permit (MUP) to construct, maintain, and operate a new wireless telecommunication facility on a 3.04-acre project site leased from the San Diego Water Authority. The facility would include 12 panel antennas, and nine remote radio units (RRU's) mounted upon a new 35-foot-tall faux mono-eucalyptus tree. Each panel antenna would be covered by "socks," which are faux leaves to help conceal the antennas. The equipment would be contained within a 300-square-foot (eight-foot-tall) concrete masonry unit (CMU) enclosure. A 20-kilowatt (kW) emergency generator, one Global Positioning System (GPS) antenna, three equipment cabinets, and other supporting equipment would be located within the equipment enclosure. Landscaping and irrigation around the masonry unit are planned to improve visual appeal and effectively screen the facility. Additionally, trenching is proposed to install underground electrical and fiber conduit. The 3.04-acre project site is located at 8555 Paradise Valley Road in the Spring Valley Community Plan Area, is zoned Office-Professional (C30) and contains an existing San Diego County Water Authority building. Access to the site would be from Paradise Valley Road. The project site is subject to the Public/Semi-Public Facilities General Plan Land Use Designation. The wireless telecommunication facility is authorized in the C30 zone upon approval of a MUP pursuant to the County of San Diego (County) Zoning Ordinance.

On April 19, 2024, the Planning Commission denied the original application due to a lack of quorum, as it failed to secure the required minimum of four votes for approval. This decision triggered a 10-day appeal period, during which the applicant submitted an appeal along with a revised plot plan on April 29, 2024. Under Section 7366(b) of the County Zoning Ordinance, the appeal process to the Board of Supervisors was terminated, and the revised application was referred back to the Planning Commission for review.

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To address community concerns regarding the wireless tower's proximity to the nearby residential property line, the applicant submitted a revised plan that shifts the wireless tower latterly 11.5 feet to the east within the same project site. This adjustment was made in response to feedback from residents who expressed concerns about proximity to nearby daycare, property value effects, and perceived health risks associated with the tower's original placement near their homes. Based on the results of an Alternative Site Analysis, which found no feasible co-location opportunities and confirmed that other potential sites either fell outside the target coverage area or could not support an additional carrier, the applicant determined that relocating the facility to a different site was not viable. Instead, in response to public feedback, the applicant identified a new location within the existing project site that better addressed community concerns while maintaining necessary service coverage.

In the initial proposal, the 35-foot-tall mono-eucalyptus tower was set back approximately 56 feet from the nearest residential property line. The revised plan increased that setback to approximately 66 feet and 8 inches. The San Diego Aqueduct easement restricted the placement of the tower any further to the east, and the San Diego County Water Authority's active use of the property for storage constrained the relocation options on the southern portion of the property. In the Planning Commission appeal application, the applicant emphasized that the project location would address critical network coverage gaps and significantly enhance service capacity to meet the growing demand in the Spring Valley area. On February 28, 2025, the Planning Commission approved the revised application, once again initiating a 10-day appeal period. On March 10, 2025, a resident on behalf of Sweetwater Hills Townhomes filed an appeal on behalf of the residents of Sweetwater Hills Townhomes, challenging the approval to the Board of Supervisors. Additional project information can be found in Attachment G, Planning Commission Hearing Report.

POINTS OF APPEAL AND PROJECT ANALYSIS

The appeal, filed on behalf of the residents of Sweetwater Hills Townhomes, contains four main points of appeal (Attachment A). Responses to all points of appeal are included below. The primary concerns identified in the appeal include:

1. Improper CEQA Exemption
2. Lack of Justification for Coverage Needs
3. Inconsistent Setback Policies
4. Precedents in Other Communities

1. Improper CEQA Exemption

The first point of appeal states that the project was improperly granted a Categorical Exemption from CEQA, arguing that it does not adequately consider unusual circumstances that may result in significant environmental impacts. The appeal raises concerns about the project's proximity to Little Starz Daycare, noting that County zoning code requires a 300-foot setback for small cell wireless facilities near daycare facilities, yet a wireless facility tower has been approved without the same restriction. A Small Cell Wireless Facility is a compact installation with limited antenna and equipment size, including Micro Wireless Facilities on overhead cables, while wireless

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facilities or non-small cell facilities are larger structures like towers and equipment buildings designed for broader coverage. Additionally, the appeal states that the project includes a 20-kilowatt diesel generator and electrical equipment, which could pose a fire risk. The appeal cites instances where similar equipment has been linked to wildfires in California. Lastly, the appeal highlights the project's location near the San Diego Aqueduct and Sweetwater Reservoir, emphasizing the potential risk of water contamination from fire suppression chemicals. Given these concerns, the appeal argues that the exemption determination does not adequately address these risks and requests further environmental review through an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND).

The County carefully evaluated the project's potential environmental impacts and determined that it qualifies for a Categorical Exemption under Section 15303 of the CEQA Guidelines, which pertains to the "New Construction or Conversion of Small Structures." This exemption applies to the construction and location of small facilities, the installation of small equipment, and minor modifications to existing structures. The application of this exemption to wireless telecommunications facilities is well-established, as seen in cases such as *Don't Cell Our Parks v. City of San Diego*, where the court upheld the use of this exemption for a similar wireless facility involving a 35-foot faux eucalyptus tree and a small equipment enclosure. In line with legal precedents, the County's use of this exemption ensures that the project meets necessary environmental protection standards without the need for further review.

The San Miguel Fire Protection District has reviewed the project and verified that it is in full compliance with applicable fire codes and is designed to meet the requirements within the Fire Code Compliance for Cellular Facilities (FP-2) policy. The District has also determined that the project does not pose a significant fire hazard and that access to the site is adequate to support effective emergency response. The proposed equipment will be enclosed by an eight-foot-tall concrete masonry unit (CMU) wall with a solid metal door, consistent with the FP-2 policy, which requires openings to be protected with fire-rated assemblies. This enclosure is designed to contain any electrical malfunction that may occur. No fuel modification is required for this facility as it will be self-protected within the CMU enclosure. The proposed 20-kilowatt standby generator will be installed within this enclosure in accordance with the Fire Code. Additionally, a fire extinguisher and a fire extinguisher cabinet are included in the project design. Irrigation for the proposed planting will ensure the health of the landscaping, further mitigating any concerns of fire risk. There is no evidence that this project poses an increased risk compared to other similar facilities.

Concerns about the potential water contamination from the construction of the wireless facility near the San Diego County aqueduct have been evaluated by County engineers and environmental specialists, who found no evidence of risk. The aqueduct consists of large, underground concrete pipes that provide substantial protection against external environmental factors. The project involves only standard construction materials and methods, with no hazardous substances beyond those typically used in routine building operations. Additionally, fire suppression systems are not proposed, and there is no evidence that a potential fire could impact the San Diego Aqueduct or Sweetwater Reservoir. A thorough environmental review under CEQA identified no significant risks to water quality, justifying the project's exemption. Given the aqueduct's secure

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infrastructure, the controlled nature of the construction process, and the rigorous review, there is no credible threat of contamination to the water supply. The project was thoroughly reviewed, and no significant impacts requiring further CEQA review were identified. Thus, the Section 15303 exemption was appropriately granted.

2. Lack of Justification for Coverage Needs

The second point of appeal states that the coverage justification provided by AT&T is misleading and that a real-world drive test should be required. The appeal states that AT&T relies on theoretical coverage maps to justify the project, but these maps are unreliable as they are not based on real-world field testing. Publicly available data from independent sources, including the Federal Communications Commission (FCC), OpenSignal, and CellMapper, indicate that Spring Valley already has full LTE and 5G coverage. The appeal asserts that the County should require AT&T to conduct an independent drive test, including a radio frequency (RF) signal analysis, to verify any claimed coverage gaps before approving the tower. The appeal also notes that this concern was raised before the Planning Commission but was ignored.

The statement that AT&T has not demonstrated a need for this tower is incorrect. The County's approval was based on a review of AT&T's submitted coverage analysis, which identified gaps in service that this facility will address. Wireless carriers rely on predictive models, which have been established as industry-standard tools for identifying coverage deficiencies. These models consider topography, existing infrastructure, and signal propagation, providing reliable data to justify the installation of the proposed facility.

The appeal's request for an independent drive test is not required per Section 6984 of the Zoning Ordinance for determining coverage needs. The FCC and other telecommunications authorities recognize predictive models as valid methods for assessing service gaps. While third-party mapping tools provide general user-reported data, they do not account for real-time network performance, interference, or actual user load demands, making them unreliable as definitive coverage assessments. AT&T has provided substantial technical evidence demonstrating the need for this project.

Coverage improvement is not only about eliminating dead zones but also ensuring sufficient capacity to handle increasing demand. Population growth and increased reliance on mobile networks necessitate infrastructure upgrades to maintain service quality. The County evaluated AT&T's justification and found it to be valid. The appeal's claims do not negate the demonstrated need for this facility, which will enhance connectivity for residents, businesses, and emergency services.

3. Inconsistent Setback Policies

The third point of appeal states that the County of San Diego's setback policies for wireless facilities are inconsistent. The appeal highlights that the proposed wireless facility is near Little Starz Daycare, a factor that would have been prohibited if it were a small cell wireless facility. Additionally, the appeal references the August 7, 2019, San Diego County Board of Supervisors' motion on small cell facility setbacks, which resulted in the 300-foot setback requirement from

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child care centers. The appeal argues that this disparity in setback policies should be re-evaluated to ensure community safety and well-being while still respecting FCC guidelines.

A Small Cell Wireless Facility (SCW), defined in Zoning Code 6992, is a compact wireless installation with antennas no larger than three cubic feet and related equipment not exceeding 28 cubic feet. It includes Micro Wireless Facilities, which are even smaller and mounted directly onto existing overhead cables. In contrast, non-small cell wireless facilities, as defined in Zoning Code 6984, are larger installations such as towers and equipment buildings that support broader network coverage.

The application references the County's 2019 deliberations on small cell tower setbacks, when the Board of Supervisors amended the Zoning Ordinance in response to FCC Order 18-133. That order, issued in September 2018, limited local control over small cell wireless facilities, prompting the County to revise its policies to comply with federal mandates while still addressing community concerns. In February 2019, the County amended its Zoning Ordinance to comply with the FCC order and directed staff to develop additional requirements to: minimize clutter, encourage co-location, establish setbacks, require undergrounding of equipment, and enhance public notification for small cell wireless facilities. By federal law, the County is prohibited from regulating wireless facilities based on the environmental effects of radio frequency emissions if the facilities comply with FCC regulations. After extensive stakeholder outreach, the County's final ordinance, adopted on August 7, 2019, established a 300-foot buffer from schools, childcare centers, hospitals, and religious facilities, and expanded setback protections to fire and sheriff stations.

Small cell wireless facilities are typically placed within public rights-of-way and in high-density areas, necessitating stricter setback regulations to reduce clutter and maintain community aesthetics. Wireless facility towers, on the other hand, are designed to serve broader areas and require specific placement to ensure optimal coverage. The Wireless Telecommunications Facilities must be designed to minimize visual impact through screening, landscaping, and camouflaging to blend with the surrounding environment.

Wireless Telecommunications Facilities are required to be set back from the nearest residential property line by a distance equal to the tower height or 50 feet, whichever is greater, as outlined in Section 6985 C.4. The purpose of this code section is to ensure that wireless facilities are sited and designed in a way that minimizes the risk of damage to nearby residential structures in the event of a facility failure or collapse. However, this distance does not apply to sites with schools, childcare centers, hospitals, religious facilities, fire stations, and sheriff stations. In contrast, the County's current regulations mandate a 300-foot setback for small cell wireless facilities from properties that include these sites, but no such setback exists for Wireless Telecommunications Facilities.

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The Board may request staff to analyze distance requirements from sensitive receptors for wireless towers and amend the existing Wireless Ordinance. Funds for this request are not included in the Fiscal Year (FY) 2024-2025 Operational Plan for Planning & Development Services (PDS). If approved, this request will result in one-time estimated implementation costs of up to \$600,000-\$900,000, depending on the option selected by the Board. Funding for implementation costs, including sources and potential impacts would need to be identified prior to program implementation. The Board can also direct staff to evaluate additional opportunities to combine the preparation of one of these options with a related ordinance or environmental review effort to reduce staff time and costs. The impact on net General Fund costs will depend on Board direction.

The 300-foot setback requirement applies to small cell wireless facilities under Section 6992.A.3 of the Zoning Ordinance. Since the proposed project is not a small cell facility, the 300-foot setback from daycare centers does not apply and is not part of the review criteria. The proposed facility does meet the required 50-foot setback from residential properties under Section 6985.C.4. In response to community feedback, within the revised plot plan for the Planning Commission appeal, the applicant relocated the tower an additional 11.5 feet to the east, increasing the distance from nearby homes. Further relocation is not possible due to site constraints of the lease agreement with the San Diego County Water Authority, which actively uses the property for storage and maintains an easement for the San Diego Aqueduct.

4. Precedents in Other Communities

The appeal attempts to compare this project to cases in La Jolla and Encinitas, but these comparisons are misleading and not directly applicable, as the County does not have land use authority over these areas. Each jurisdiction has unique zoning laws, land-use policies, and regulatory frameworks that influence project approval. The La Jolla case referenced in the appeal involved a project that was ultimately withdrawn due to specific local concerns that do not apply to the current project. The County reviewed this application independently and determined it meets all relevant criteria.

Encinitas' setback requirements for cell towers reflect local policy choices that do not bind San Diego County. The argument that Spring Valley should adopt Encinitas' regulations does not factor in the distinct differences in land use, population density, and telecommunications needs between these areas. The County must evaluate projects based on its own established policies rather than adopting external standards that may not be suitable for this community's infrastructure needs.

The County's approval of this project is consistent with its long-term infrastructure planning goals as it will improve wireless connectivity, enhance emergency communication capabilities, and support future technological advancements.

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ENVIRONMENTAL STATEMENT

The Project has been reviewed for compliance with the California Environmental Quality Act (CEQA). A Notice of Exemption has been prepared for this project pursuant to CEQA and is on file with Planning & Development Services and with the Clerk of the Board (Attachments B and H). The project is exempt from CEQA pursuant to Section 15303 because it is an unmanned wireless telecommunications facility that involves the installation of Small, New Equipment and Facilities in Small Structures. It has been determined that the project is not in an environmentally sensitive location; will not have a cumulative effect on the environment; is not on a hazardous waste site; will not cause substantial change in the significance of a historical resource; and will not result in damage to a scenic highway. The Board of Supervisors will determine whether to adopt the Notice of Exemption.

PUBLIC INPUT

At the time of application submission in December 2022, and in accordance with Board Policy I-49, public notices were distributed to property owners within a minimum radius of 500 feet from the project site, ensuring that at least 20 different property owners were notified. In total, 114 property owners received notices. As a result of this outreach, written comments and phone calls were received from community members. Seven individuals submitted a signed letter opposing the project, citing concerns about the tower's potential impacts on health, safety, and property values. Additionally, six community members expressed similar concerns via phone and email, with some also questioning the proposed location of the tower. Two individuals inquired about the project details, specifically the proposed location and potential impacts on property views.

For the April 19, 2024, Planning Commission hearing, public notices were again sent to the required minimum of 20 property owners within a 500-foot radius. During the hearing, four community members spoke, reiterating concerns regarding the tower's effects on health, safety, and property values, as well as its proximity to adjacent properties and a nearby daycare facility.

Following the hearing, individuals who had submitted public comments were notified of the appeal filing. In preparation for the February 28, 2025, Planning Commission Appeal hearing, public notices were once again sent to the required minimum of 20 property owners within a 500-foot radius. Staff received one letter of concern prior to the hearing. The appeal hearing provided another opportunity for public comment, during which four community members spoke, restating concerns about the tower's effects on health, safety, and property values, as well as the potential fire hazard and the undesirable location near residences, adjacent properties, and a nearby daycare facility.

DEPARTMENT REASONS FOR RECOMMENDATION

The proposed Paradise Valley Road Wireless Telecommunication Facility complies with all applicable regulations, including the Zoning Ordinance, General Plan, and the California Environmental Quality Act (CEQA). The project site is suitable for development as it is located within a Public/Semi-Public Facilities General Plan land use designation and Office-Professional zone, leased from the San Diego County Water Authority. The facility is designed as a mono-eucalyptus tree, blending with the existing landscape and preserving the community character. The project enhances telecommunications infrastructure, which is essential for public safety,

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emergency response, and network reliability. While some community concerns remain, the project has undergone thorough review, and the appeal does not present substantial evidence that the facility will cause significant environmental or community harm.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today's proposed action supports the Strategic Initiatives of Equity, Empower, and Community in the County of San Diego's 2025-2030 Strategic Plan by enhancing telecommunications infrastructure that supports public safety, economic opportunity, and community resiliency. The proposed action supports the Community Strategic Initiative in the County of San Diego's 2025-2030 Strategic Plan by improving network connectivity in the Spring Valley area, the Project strengthens regional safety through increased emergency response capabilities and access to reliable communication services. The Project also promotes economic sustainability by supporting local businesses, residents, and essential services that rely on stable and efficient telecommunications. The Project contributes to environmental and climate goals by utilizing an existing developed site, minimizing land disturbance, and ensuring compliance with County regulations aimed at preserving community character and scenic resources. Lastly, the Project fosters community engagement by addressing local connectivity needs and ensuring equitable access to modern infrastructure, reinforcing the County's commitment to long-term regional success and quality of life improvements.

Respectfully submitted,



DAHVIA LYNCH

Deputy Chief Administrative Officer

ATTACHMENT(S)

Note: Due to the size of the attachments, the documents are available online through the Clerk of the Board's website at www.sandiegocounty.gov/content/sdc/cob/bosa.html.

Attachment A	Appeal Forms
Attachment B	Environmental Findings
Attachment C	MUP Form of Decision PDS2022-MUP-22-012
Attachment D	Defense and Indemnification Agreement
Attachment E	Public Documentation
Attachment F	Ownership Disclosure
Attachment G	Planning Commission Report
Attachment H	Environmental Documentation
Attachment I	Planning Documentation