REPORT TO THE HEARING OFFICER

HEARING DATE: May 28, 2014

ATTENTION: Hearing Officer

SUBJECT: AT&T - Logan Heights

PTS PROJECT NUMBER: 333926

LOCATION: 3034 Commercial Street

APPLICANT: AT&T MOBILITY (Permittee)/ CHARLES K. WATSON and RONALD E. TAYLOR (Owners)

SUMMARY

Issue: Should the Hearing Officer approve a Neighborhood Development Permit (NDP) and a Site Development Permit (SDP) for a Wireless Communication Facility (WCF) in the Southeastern San Diego Community Plan Area?

Staff Recommendation: APPROVE Neighborhood Development Permit (NDP) No. 1201845 and Site Development Permit (SDP) No. 1201846.

Community Planning Group Recommendation: The applicant has indicated that the Southeastern San Diego community planning group should review this item at an upcoming meeting. Minutes from this meeting were not available at the printing deadline, and an update will be provided prior to the hearing.

Environmental Review: This project was determined to be exempt pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15303 (new construction or conversion of small structures). This project is not pending an appeal of the environmental determination. The environmental exemption determination for this project was made on April 16, 2014, and the opportunity to appeal that determination ended May 2, 2014. (Attachment 7)

BACKGROUND

This project is an application for a Neighborhood Development Permit (NDP) and Site Development Permit (SDP), Process 3, for a Wireless Communication Facility (WCF). The project is located at 3034 Commercial Street. The project is located in the Southeastern San
Diego Planned District (SESDPD) I-1 zone, within the Southeast San Diego Community Plan Area (Attachments 1, 2, 3 and 4).

WCFs are permitted in industrial zones with a Limited Use, Staff-level approval, pursuant to Land Development Code (LDC) section 141.0420(c)(1)(A). In this case, an NDP is required, because the equipment enclosure exceeds 250 square-feet [LDC section 141.0420(g)(3)]. This project is also located in the SESDPD which requires a Southeastern San Diego Development Permit (SESDDP) for commercial and industrial development [LDC section 1519.0202(a)(3)]. The SESDDP is being processed as a Site Development Permit, Process 3.

**DISCUSSION**

**Project Description:**

This WCF proposes to install 12 panel antennas, concealed within a new 40-foot tall structure designed to resemble a sand hopper. Antennas will be located behind radio-frequency (RF) transparent material, painted and textured to match the structure. This structure has been designed to blend in with the surrounding industrial development. Equipment associated with the antennas will be located in a 288 square-foot equipment building. To improve the appearance as seen from the public right-of-way, two street trees will be added, matching the existing street tree species.

The SESDPD-I-1 development regulations indicate that a 30-foot height limit should be applied to structures located 200 feet from residentially zoned property. While there is an existing building located immediately adjacent to the WCF, and there are residential properties in the surrounding area, the WCF is located more than 200 feet from residentially zoned property, therefore the height limitation does not apply. Initially, AT&T proposed a 45-foot tall structure, but reduced the height to 40-feet to integrate more effectively with the surrounding built environment.

The WCF Regulations and Council Policy 600-43 encourage wireless providers to locate WCFs away from residential and other sensitive uses by providing lower permit process levels in commercial and industrial zones. WCFs located in commercial and industrial zones are permitted with Process 1 (Staff-level) approvals, whereas WCFs located in a residential zone with a residential use are permitted with a Process 4 (Planning Commission) approval. As this particular project is located in an industrial zone, a Process 1 approval would typically be required. However, as noted earlier, a Process 2 NDP (required for the equipment area size) and a Process 3 SESDDP, processed as a SDP (required by the SESDPD), are also required for this project. The proposed location – an industrial zone – is considered one of the most preferred locations for siting a WCF. It should be noted that Wireless carriers are required to provide coverage throughout their license area, which sometimes necessitates locating a WCF in a less preferable area.

WCFs are required to “use all reasonable means to conceal or minimize the visual impact of the WCF through integration…” Integration with existing structures or among existing uses shall be
accomplished through the use of architecture, landscape, and siting solutions. In this case, AT&T is proposing to locate their antennas in a faux sand hopper structure, designed to resemble a typical industrial-type structure one might find in the area. Equipment associated with the antennas will be located in a 288 square-foot enclosure adjacent to the structure. Two street trees will be added adjacent to the project to supplement the existing trees, which will help to screen and buffer views of the WCF as seen from the public right-of-way. No deviations are requested as part of this project.

Community Plan Analysis:

While the Southeastern Community Plan does not specifically address WCFs, the City’s General Plan addresses WCFs in UD-A.15 as follows:

Minimize the visual impact of wireless facilities.

a) Conceal wireless facilities in existing structures when possible, otherwise use camouflage and screening techniques to hide or blend them into the surrounding area.

b) Design facilities to be aesthetically pleasing and respectful of the neighborhood context.

c) Conceal mechanical equipment and devices associated with wireless facilities in underground vaults or unobtrusive structures.

This project complies with the General Plan recommendations by concealing the antennas in a structure, designed to integrate with the existing industrial buildings along Commercial Street. Equipment associated with the antennas will be located in an enclosure at the base of the tower. Two street trees will be added to supplement the existing trees, to help screen views of the structure. The project has been designed to be respectful of the neighborhood context and works to integrate with existing development.

Conclusion:

This project complies with the applicable regulations of the Land Development Code and the City’s General Plan and draft findings (Attachment 5) have been made in the affirmative. Therefore, staff recommends approval of NDP No. 1201845 and SDP No. 1201846.

ALTERNATIVES

1. Approve NDP No. 1201845 and SDP No. 1201846, with modifications.

2. Deny NDP No. 1201845 and SDP No. 1201846, if the Planning Commission makes written findings based on substantial evidence that the approval is not authorized by state or local zoning law.
Respectfully submitted,

[Signature]

Alex Hempton, AICP
Development Project Manager

Attachments:
1. Aerial Photo
2. Community Plan Land Use Map
3. Project Location Map
4. Project Data Sheet
5. Draft Permit Resolution with Findings
6. Draft Permit with Conditions
7. Notice of Right to Appeal Environmental Exemption
8. Community Planning Group Recommendation
9. Ownership Disclosure Statement (ODS)
10. Photo Simulations
11. Photo Survey
12. Site Justification/Coverage Maps
13. Hearing Officer Hearing Public Notice
14. Project Plans
Aerial Photo
AT&T Logan Heights – Project Number 333926
3034 Commercial St.
Designated as “Light Industrial” in the latest Community Plan Update Land Use Map.
Project Location Map

AT&T Logan Heights – Project Number 333926

3034 Commercial St.
**PROJECT DATA SHEET**

<table>
<thead>
<tr>
<th>PROJECT NAME:</th>
<th>AT&amp;T – Logan Heights</th>
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<tbody>
<tr>
<td>PROJECT DESCRIPTION:</td>
<td>Wireless Communication Facility (WCF) consisting of a 40-foot tall faux sand hopper structure (concealing 12 panel antennas) and a 288 square-foot equipment enclosure with associated equipment.</td>
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<tr>
<td>COMMUNITY PLAN AREA:</td>
<td>Southeastern San Diego</td>
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<tr>
<td>DISCRETIONARY ACTIONS:</td>
<td>NDP and SDP, Process 3</td>
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<tr>
<td>COMMUNITY PLAN LAND USE DESIGNATION:</td>
<td>Light Industrial (as indicated on the latest Community Plan Update Land Use Map – unclear in current plan)</td>
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</table>

**ZONING INFORMATION:**

ZONE: SESDPD-I-1
HEIGHT LIMIT: None or 30 feet, if located within 200 feet of residentially zoned property
FRONT SETBACK: 10 feet
SIDE SETBACK: 0 feet
STREETSIDE SETBACK: 10 feet
REAR SETBACK: 15 feet

<table>
<thead>
<tr>
<th>ADJACENT PROPERTIES:</th>
<th>LAND USE DESIGNATION &amp; ZONE</th>
<th>EXISTING LAND USE</th>
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<td>WEST:</td>
<td>Light Industrial, SESDPD-I-1</td>
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</tr>
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DEVIATIONS OR VARIANCES REQUESTED: None.

COMMUNITY PLANNING GROUP RECOMMENDATION: No recommendation has been provided as of the print deadline.
WHEREAS, THE CITY OF SAN DIEGO, Owner, and AT&T MOBILITY, Permittee, filed an application with the City of San Diego for a permit to construct a Wireless Communication Facility (WCF) consisting of a 40-foot tall faux sand hopper structure, concealing 12 panel antennas, and a 288 square-foot equipment enclosure located adjacent to the sand hopper (as described in and by reference to the approved Exhibits “A” and corresponding conditions of approval for the associated Permit Nos. 1201845 and 1201846);

WHEREAS, the project site is located at 3034 Commercial Street, in the Southeastern San Diego Planned District (SESDPD) I-1 zone of the Southeastern San Diego community planning area;

WHEREAS, on April 16, 2014, the City of San Diego, as Lead Agency, through the Development Services Department, made and issued an Environmental Determination that the project is exempt from the California Environmental Quality Act (CEQA) (Public Resources Code section 21000 et. seq.) under CEQA Guideline Section 15303 (new construction or conversion of small structures) of the State CEQA Guidelines and there was no appeal of the Environmental Determination filed within the time period provided by San Diego Municipal Code Section 112.0520;

WHEREAS, on May 28, 2014, the Hearing Officer of the City of San Diego considered Neighborhood Development Permit No. 1201845 and Site Development Permit No. 1201846 pursuant to the Land Development Code of the City of San Diego; NOW, THEREFORE,

BE IT RESOLVED by the Hearing Officer of the City of San Diego as follows:

That the Hearing Officer adopts the following written Findings, dated May 28, 2014.

FINDINGS:

Neighborhood Development Permit - Section 126.0402

1. The proposed development will not adversely affect the applicable land use plan;

While the Southeastern San Diego Community Plan does not specifically address WCFs, the City of San Diego General Plan states that the visual impact of wireless facilities should be minimized. Wireless facilities should be concealed in existing structures when possible, or utilize camouflage and screening techniques to hide or blend them into the surrounding area. Facilities should be designed to be aesthetically pleasing and respectful of the neighborhood context. Mechanical and other equipment and devices should be concealed in underground vaults or other unobtrusive structures. With this project, AT&T is proposing to locate antennas inside a 40-foot tall faux sand hopper structure, which resembles a structure one might find in an industrial area. Equipment is
ATTACHMENT 5

located at the base of the structure in a 288 square-foot enclosure. Two street trees are being added to the public right-of-way adjacent to the project, in an attempt to improve views of the WCF as seen from the street.

The purpose and intent of the Southeastern San Diego Planned District Ordinance is “to provide reasonable development criteria for the construction or alteration of quality residential, commercial and industrial development throughout the Southeastern San Diego community. The intent is to implement the Southeastern San Diego Community Plan through the use of the applied urban design standards contained in this Southeastern San Diego Planned District Ordinance.”

This project complies with the purpose and intent of the regulations by generating a WCF design that is architecturally integrated with the existing industrial development along Commercial Street. The proposed faux sand hopper structure is a creative attempt to be compatible with the existing warehouses and other industrial structures in the area. The height was originally proposed at 45-feet tall, but was reduced to 40-feet tall in order to blend in more effectively with the height of existing structures in the area.

Based on the design of this project, the project is respectful of the neighborhood context, meets the purpose and intent of the Southeastern San Diego Planned District, and does not adversely affect the applicable land use plans.

2. The proposed development will not be detrimental to the public health, safety, and welfare; and

The project consists of a 40-foot tall faux sand hopper structure concealing 12 panel antennas and a 288 square-foot equipment enclosure. The project is located at 3034 Commercial Street within the Southeastern San Diego Community Plan Area.

The project was determined to be exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303 (new construction or conversion of small structures). The conditions of approval for the project will require compliance with several operational constraints and development controls intended to assure the continued public health, safety and welfare. All proposed improvement plans associated with the project will be reviewed prior to issuance of construction permits and inspected during construction to assure the project will meet or exceed all relevant and applicable building, electrical, mechanical, plumbing and fire codes.

Additionally, the Telecommunication Act of 1996 preempts local governments from regulating the “placement, construction and modification of wireless communication facilities on the basis of the environmental effects of Radio Frequency (RF) emission to the extent that such facilities comply with the Federal Communication Commission's (FCC) standards for such emissions.” A condition has been added to the permit to require a Radio Frequency Electromagnetic Fields Exposure Report demonstrating that the proposed project would be consistent with the FCC’s regulations for wireless facilities. Therefore, the project would not result in any significant health or safety risks to the surrounding area within matters of the City's jurisdiction.

In conclusion, the proposed project will not be detrimental to the public health, safety and welfare.

3. The proposed development will comply with the applicable regulations of the
Land Development Code.

WCFs are permitted in industrial zones with a Limited Use, Staff-level approval, pursuant to Land Development Code (LDC) section 141.0420(c)(1)(A). In this case, an NDP is required, because the equipment enclosure exceeds 250 square-feet [LDC section 141.0420(g)(3)]. This project is also located in the SESDPD which requires a Southeastern San Diego Development Permit (SESDDP) for commercial and industrial development [LDC section 1519.0202(a)(3)]. The SESDDP is being processed as a Site Development Permit, Process 3. No deviations are requested. The project has been designed to conceal the WCF inside a faux structure, typically found in an industrial area, in an attempt to blend in with existing development. The project complies with the relevant regulations of the Land Development Code.

Site Development Permit

A. Findings for all Site Development Permits – Section 126.0502

1. The proposed development will not adversely affect the applicable land use plan;

While the Southeastern San Diego Community Plan does not specifically address WCFs, the City of San Diego General Plan states that the visual impact of wireless facilities should be minimized. Wireless facilities should be concealed in existing structures when possible, or utilize camouflage and screening techniques to hide or blend them into the surrounding area. Facilities should be designed to be aesthetically pleasing and respectful of the neighborhood context. Mechanical and other equipment and devices should be concealed in underground vaults or other unobtrusive structures. With this project, AT&T is proposing to locate antennas inside a 40-foot tall faux sand hopper structure, which resembles a structure one might find in an industrial area. Equipment is located at the base of the structure in a 288 square-foot enclosure. Two street trees are being added to the public right-of-way adjacent to the project, in an attempt to improve views of the WCF as seen from the street.

The purpose and intent of the Southeastern San Diego Planned District Ordinance is “to provide reasonable development criteria for the construction or alteration of quality residential, commercial and industrial development throughout the Southeastern San Diego community. The intent is to implement the Southeastern San Diego Community Plan through the use of the applied urban design standards contained in this Southeastern San Diego Planned District Ordinance.” This project complies with the purpose and intent of the regulations by generating a WCF design that is architecturally integrated with the existing industrial development along Commercial Street. The proposed faux sand hopper structure is a creative attempt to be compatible with the existing warehouses and other industrial structures in the area. The height was originally proposed at 45-feet tall, but was reduced to 40-feet tall in order to blend in more effectively with the height of existing structures in the area.

Based on the design of this project, the project is respectful of the neighborhood context, meets the purpose and intent of the Southeastern San Diego Planned District, and does not adversely affect the applicable land use plans.

2. The proposed development will not be detrimental to the public health,
safety, and welfare;

The project consists of a 40-foot tall faux sand hopper structure concealing 12 panel antennas and a 288 square-foot equipment enclosure. The project is located at 3034 Commercial Street within the Southeastern San Diego community plan area.

The project was determined to be exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303 (new construction or conversion of small structures). The conditions of approval for the project will require compliance with several operational constraints and development controls intended to assure the continued public health, safety and welfare. All proposed improvement plans associated with the project will be reviewed prior to issuance of construction permits and inspected during construction to assure the project will meet or exceed all relevant and applicable building, electrical, mechanical, plumbing and fire codes.

Additionally, the Telecommunication Act of 1996 preempts local governments from regulating the “placement, construction and modification of wireless communication facilities on the basis of the environmental effects of Radio Frequency (RF) emission to the extent that such facilities comply with the Federal Communication Commission’s (FCC) standards for such emissions.” A condition has been added to the permit to require a Radio Frequency Electromagnetic Fields Exposure Report demonstrating that the proposed project would be consistent with the FCC’s regulations for wireless facilities. Therefore, the project would not result in any significant health or safety risks to the surrounding area within matters of the City's jurisdiction.

In conclusion, the proposed project will not be detrimental to the public health, safety and welfare.

3. The proposed development will comply with the applicable regulations of the Land Development Code, including any allowable deviations pursuant to the Land Development Code.

WCFs are permitted in industrial zones with a Limited Use, Staff-level approval, pursuant to Land Development Code (LDC) section 141.0420(c)(1)(A). In this case, an NDP is required, because the equipment enclosure exceeds 250 square-feet [LDC section 141.0420(g)(3)]. This project is also located in the SESDPD which requires a Southeastern San Diego Development Permit (SESDDP) for commercial and industrial development [LDC section 1519.0202(a)(3)]. The SESDDP is being processed as a Site Development Permit, Process 3. No deviations are requested. The project has been designed to conceal the WCF inside a faux structure, typically found in an industrial area, in an attempt to blend in with existing development. The project complies with the relevant regulations of the Municipal Code.

B. Findings for Southeastern San Diego Development Permits – 1519.0202(c)

1. The proposed use and project design meet the purpose and intent of the Southeastern San Diego Planned District Ordinance, comply with the recommendations of the Southeastern San Diego Community Plan, and will not adversely affect the General Plan or other applicable plans adopted by the City Council;
While the Southeastern San Diego Community Plan does not specifically address WCFs, the City of San Diego General Plan states that the visual impact of wireless facilities should be minimized. Wireless facilities should be concealed in existing structures when possible, or utilize camouflage and screening techniques to hide or blend them into the surrounding area. Facilities should be designed to be aesthetically pleasing and respectful of the neighborhood context. Mechanical and other equipment and devices should be concealed in underground vaults or other unobtrusive structures. With this project, AT&T is proposing to locate antennas inside a 40-foot tall faux sand hopper structure, which resembles a structure one might find in an industrial area. Equipment is located at the base of the structure in a 288 square-foot enclosure. Two street trees are being added to the public right-of-way adjacent to the project, in an attempt to improve views of the WCF as seen from the street.

The purpose and intent of the Southeastern San Diego Planned District Ordinance is “to provide reasonable development criteria for the construction or alteration of quality residential, commercial and industrial development throughout the Southeastern San Diego community. The intent is to implement the Southeastern San Diego Community Plan through the use of the applied urban design standards contained in this Southeastern San Diego Planned District Ordinance.” This project complies with the purpose and intent of the regulations by generating a WCF design that is architecturally integrated with the existing industrial development along Commercial Street. The proposed faux sand hopper structure is a creative attempt to be compatible with the existing warehouses and other industrial structures in the area. The height was originally proposed at 45-feet tall, but was reduced to 40-feet tall in order to blend in more effectively with the height of existing structures in the area.

Based on the design of this project, the project is respectful of the neighborhood context, meets the purpose and intent of the Southeastern San Diego Planned District, and does not adversely affect the General Plan or other applicable land use plans.

2. The proposed development shall be compatible with existing and planned land use on adjoining properties and shall not constitute a disruptive element to the neighborhood and community. In addition, architectural harmony with the surrounding neighborhood and community shall be achieved as far as practicable;

The proposed draft land use plan prepared for this area as part of the Southeastern San Diego Community Plan Update process shows that this area will remain designated as “Light Industrial” which is consistent with the existing zoning. This same zone is present on the adjacent parcels to the east and west. The WCF was originally proposed at 45 feet tall. In an effort to be more compatible with the existing development in the area, the height was reduced to not exceed 40 feet. The design of this project as a “sand hopper” is meant to result in a structure that will blend in and be compatible with existing industrial development along Commercial Street. AT&T will be supplementing the existing street trees with two additional street trees as a way of screening and integrating the WCF with the community as seen from the public right-of-way. Based on the design of the project, the proposed development will be compatible with existing and planned land use on adjoining properties and will not disrupt the neighborhood or community, and architectural harmony with the surrounding neighborhood and community will be achieved as far as practicable.
3. The proposed use, because of conditions that have been applied to it, will not be detrimental to the health, safety and general welfare of persons residing or working in the area, and will not adversely affect other property in the vicinity; and

The project consists of a 40-foot tall faux sand hopper structure concealing 12 panel antennas and a 288 square-foot equipment enclosure. The project is located at 3034 Commercial Street within the Southeastern San Diego Community Plan Area.

The project was determined to be exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15303 (new construction or conversion of small structures). The conditions of approval for the project will require compliance with several operational constraints and development controls intended to assure the continued public health, safety and welfare. All proposed improvement plans associated with the project will be reviewed prior to issuance of construction permits and inspected during construction to assure the project will meet or exceed all relevant and applicable building, electrical, mechanical, plumbing and fire codes.

Additionally, the Telecommunication Act of 1996 preempts local governments from regulating the “placement, construction and modification of wireless communication facilities on the basis of the environmental effects of Radio Frequency (RF) emission to the extent that such facilities comply with the Federal Communication Commission’s (FCC) standards for such emissions.” A condition has been added to the permit to require a Radio Frequency Electromagnetic Fields Exposure Report demonstrating that the proposed project would be consistent with the FCC’s regulations for wireless facilities. Therefore, the project would not result in any significant health or safety risks to the surrounding area within matters of the City’s jurisdiction.

In conclusion, the proposed project will not be detrimental to the health, safety and general welfare of persons residing or working in the area, and will not adversely affect other property in the vicinity.

4. The proposed use will comply with the relevant regulations of the Municipal Code.

WCFs are permitted in industrial zones with a Limited Use, Staff-level approval, pursuant to Land Development Code (LDC) section 141.0420(c)(1)(A). In this case, an NDP is required, because the equipment enclosure exceeds 250 square-feet [LDC section 141.0420(g)(3)]. This project is also located in the SESDPD which requires a Southeastern San Diego Development Permit (SESDDP) for commercial and industrial development [LDC section 1519.0202(a)(3)]. The SESDDP is being processed as a Site Development Permit, Process 3. The project has been designed to conceal the WCF inside a faux structure, typically found in an industrial area, in an attempt to blend in with existing development. The project complies with the relevant regulations of the Municipal Code.

BE IT FURTHER RESOLVED that, based on the findings hereinbefore adopted by the Hearing Officer Neighborhood Development Permit No. 1201845 and Site Development Permit No. 1201846 are hereby GRANTED by the Hearing Officer to the referenced Owner/Permittee, in the form, exhibits, terms and conditions as set forth in Permit Nos. 1201845 and 1201846, a copy of which is attached hereto and made a part hereof.
Alex Hempton, AICP
Development Project Manager
Development Services

Adopted on: May 28, 2014

Internal Order No. 24003999
NEIGHBORHOOD DEVELOPMENT PERMIT NO. 1201845
SITE DEVELOPMENT PERMIT NO. 1201846
AT&T – LOGAN HEIGHTS
PROJECT NO. 333926
HEARING OFFICER

This NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) No. 1201845 and SITE DEVELOPMENT PERMIT (SDP) No. 1201846 is granted by the Hearing Officer of the City of San Diego to CHARLES K. WATSON and RONALD E. TAYLOR, Owners, and AT&T MOBILITY, Permittee, pursuant to San Diego Municipal Code [SDMC] sections 141.0420, 1519.0202, 126.0402, and 126.0502. The site is located at 3034 Commercial Street in the SESDPD-I-1 zone of the Southeastern San Diego community planning area. The project site is legally described as: Lots 39 through 48 in Block 104 of Central Park, in the City of San Diego, County of San Diego, State of California, according to Map Thereof No. 435, filed in the Office of the County Recorder of San Diego County, November 9, 1887.

Subject to the terms and conditions set forth in this Permit, permission is granted to Owner/Permittee to construct, operate, and maintain a Wireless Communication Facility (WCF) described and identified by size, dimension, quantity, type, and location on the approved exhibits [Exhibit "A"] dated May 28, 2014, on file in the Development Services Department.

The project shall include:

a. A 40-foot tall faux sandhopper, concealing 12 panel antennas, 24 remote radio units (RRUs), and 4 surge suppressors. Equipment is proposed in a 492 square foot equipment enclosure, which is permitted with the processing of this NDP. Antenna dimensions are: 78.3" by 11.8" by 6.0";

b. Landscaping (planting, irrigation and landscape related improvements);
c. Public and private accessory improvements determined by the Development Services Department to be consistent with the land use and development standards for this site in accordance with the adopted community plan, the California Environmental Quality Act [CEQA] and the CEQA Guidelines, the City Engineer’s requirements, zoning regulations, conditions of this Permit, and any other applicable regulations of the SDMC.

STANDARD REQUIREMENTS:

1. This permit must be utilized within thirty-six (36) months after the date on which all rights of appeal have expired. If this permit is not utilized in accordance with Chapter 12, Article 6, Division 1 of the SDMC within the 36 month period, this permit shall be void unless an Extension of Time has been granted. Any such Extension of Time must meet all SDMC requirements and applicable guidelines in effect at the time the extension is considered by the appropriate decision maker. This permit must be utilized by June 11, 2017.

2. This NDP and SDP and corresponding use of this site shall expire on June 11, 2024. Upon expiration of this Permit, the facilities and improvements described herein shall be removed from this site and the property shall be restored to its original condition preceding approval of this Permit.

3. No later than ninety (90) days prior to the expiration of this permit, the Owner/Permittee may submit a new application to the City Manager for consideration with review and a decision by the appropriate decision maker at that time. Failure to submit prior to the deadline will be cause for enforcement for noncompliance, which may include penalties and fines.

4. Under no circumstances, does approval of this permit authorize the Owner/Permittee to utilize this site for wireless communication purposes beyond the permit expiration date. Use of this permit beyond the expiration date of this permit is prohibited.

5. No permit for the construction, occupancy, or operation of any facility or improvement described herein shall be granted, nor shall any activity authorized by this Permit be conducted on the premises until:

   a. The Owner/Permittee signs and returns the Permit to the Development Services Department; and

   b. The Permit is recorded in the Office of the San Diego County Recorder.

6. While this Permit is in effect, the subject property shall be used only for the purposes and under the terms and conditions set forth in this Permit unless otherwise authorized by the appropriate City decision maker.

7. This Permit is a covenant running with the subject property and all of the requirements and conditions of this Permit and related documents shall be binding upon the Owner/Permittee and any successor(s) in interest.
8. The continued use of this Permit shall be subject to the regulations of this and any other applicable governmental agency.

9. Issuance of this Permit by the City of San Diego does not authorize the Owner/Permittee for this Permit to violate any Federal, State or City laws, ordinances, regulations or policies including, but not limited to, the Endangered Species Act of 1973 [ESA] and any amendments thereto (16 U.S.C. § 1531 et seq.).

10. The Owner/Permittee shall secure all necessary building permits. The Owner/Permittee is informed that to secure these permits, substantial building modifications and site improvements may be required to comply with applicable building, fire, mechanical, and plumbing codes, and State and Federal disability access laws.

11. Construction plans shall be in substantial conformity to Exhibit "A." Changes, modifications, or alterations to the construction plans are prohibited unless appropriate application(s) or amendment(s) to this Permit have been granted.

12. All of the conditions contained in this Permit have been considered and were determined necessary to make the findings required for approval of this Permit. The Permit holder is required to comply with each and every condition in order to maintain the entitlements that are granted by this Permit.

If any condition of this Permit, on a legal challenge by the Owner/Permittee of this Permit, is found or held by a court of competent jurisdiction to be invalid, unenforceable, or unreasonable, this Permit shall be void. However, in such an event, the Owner/Permittee shall have the right, by paying applicable processing fees, to bring a request for a new permit without the "invalid" conditions(s) back to the discretionary body which approved the Permit for a determination by that body as to whether all of the findings necessary for the issuance of the proposed permit can still be made in the absence of the "invalid" condition(s). Such hearing shall be a hearing de novo, and the discretionary body shall have the absolute right to approve, disapprove, or modify the proposed permit and the condition(s) contained therein.

13. The Owner/Permittee shall defend, indemnify, and hold harmless the City, its agents, officers, and employees from any and all claims, actions, proceedings, damages, judgments, or costs, including attorney’s fees, against the City or its agents, officers, or employees, relating to the issuance of this permit including, but not limited to, any action to attack, set aside, void, challenge, or annul this development approval and any environmental document or decision. The City will promptly notify Owner/Permittee of any claim, action, or proceeding and, if the City should fail to cooperate fully in the defense, the Owner/Permittee shall not thereafter be responsible to defend, indemnify, and hold harmless the City or its agents, officers, and employees. The City may elect to conduct its own defense, participate in its own defense, or obtain independent legal counsel in defense of any claim related to this indemnification. In the event of such election, Owner/Permittee shall pay all of the costs related thereto, including without limitation reasonable attorney’s fees and costs. In the event of a disagreement between the City and Owner/Permittee regarding litigation issues, the City shall have the authority to
control the litigation and make litigation related decisions, including, but not limited to, settlement or other disposition of the matter. However, the Owner/Permittee shall not be required to pay or perform any settlement unless such settlement is approved by Owner/Permittee.

**AIRPORT REQUIREMENTS:**

14. Prior to issuance of building permit, the Owner/Permittee shall provide a valid "Determination of No Hazard to Air Navigation" issued by the Federal Aviation Administration [FAA].

**ENGINEERING REQUIREMENTS:**

15. Prior to the issuance of any construction permit, the Permittee shall obtain a Nonexclusive Right-of-Way Use Agreement from the City of San Diego for the proposed work in the Commercial Street and the Adjacent Alley Right-of-Way.

16. Prior to the issuance of any construction permit, the Permittee shall obtain a Public Right-of-Way permit for the proposed work in the Commercial Street and the Adjacent Alley Right-of-Way.

17. The project proposes to export 15 cubic yards of material from the project site. All excavated material listed to be exported, shall be exported to a legal disposal site in accordance with the Standard Specifications for Public Works Construction (the "Green Book"), 2003 edition and Regional Supplement Amendments adopted by Regional- Standards Committee.

18. Prior to the issuance of any construction permit, the Permittee shall enter into a Maintenance Agreement for the ongoing permanent BMP maintenance, satisfactory to the City Engineer.

19. Prior to the issuance of any construction permit, the Permittee shall incorporate any construction Best Management Practices necessary to comply with Chapter 14, Article 2, Division 1 (Grading Regulations) of the San Diego Municipal Code, into the construction plans or specifications.

20. Prior to the issuance of any construction permit the Permittee shall submit a Water Pollution Control Plan (WPCP). The WPCP shall be prepared in accordance with the guidelines in Appendix E of the City's Storm Water Standards.

**LANDSCAPE REQUIREMENTS:**

21. In the event that the Landscape Plan and the Site Plan conflict, the Site Plan shall be revised to be consistent with the Landscape Plan such that landscape areas are consistent with the Exhibit 'A' Landscape Development Plan.

22. Prior to issuance of any construction permits, complete landscape and irrigation construction documents consistent with the Land Development Manual: Landscape Standards

Page 4 of 7
shall be submitted to the Development Services Department for approval. The construction
documents shall be in substantial conformance with Exhibit "A," Landscape Development Plan,
on file in the Office of the Development Services Department. Construction plans shall provide a
40 square foot area around each tree which is unencumbered by hardscape and utilities.

23. All required landscape shall be maintained in a disease, weed and litter free condition at all
times. Severe pruning or "topping" of trees is not permitted. The trees shall be maintained in a
safe manner to allow each tree to grow to its mature height and spread.

**PLANNING/DESIGN REQUIREMENTS:**

24. A topographical survey conforming to the provisions of the SDMC may be required if it is
determined, during construction, that there may be a conflict between the building(s) under
construction and a condition of this Permit or a regulation of the underlying zone. The cost of
any such survey shall be borne by the Owner/Permittee.

25. Antennas and mounting apparatus shall not extend above the sandhopper screening.

26. All private outdoor lighting shall be shaded and adjusted to fall on the same premises
where such lights are located and in accordance with the applicable regulations in the SDMC.

27. All facilities and related equipment shall be maintained in good working order; free from
trash, debris, graffiti; and designed to discourage vandalism. Any damaged equipment shall be
repaired or replaced within thirty (30) calendar days of notification by the City of San Diego.

28. The Owner/Permittee shall notify the City within 30 days of the sale or transfer of this site
to any other provider or if the site is no longer operational requiring the removal and the
restoration of this site to its original condition.

29. The photosimulation(s) for the proposed project shall be printed (not stapled) on the
building plans. This is to ensure the construction team building the project is in compliance with
approved the Exhibit “A.”

30. No overhead cabling is allowed for this project.

31. The Owner/Permittee shall not cause or allow the antennas located on the building to be
different sizes (length, width, or height) than as shown on the stamped approved plans.

32. The WCF shall conform to Exhibit “A” (consisting of the stamped approved plans and
approved photosimulations) prior to receiving final inspection approval.

33. Prior to the issuance of a construction permit, the telecommunication provider shall provide
a certified cumulative radio frequency model study demonstrating compliance with the Federal
Communications Commission’s Radio Frequency Guidelines. All significant contributors to the
ambient RF environment should be considered in the radio frequency model study.
34. All equipment, including transformers, emergency generators and air conditioners belonging to the Permittee shall be designed and operated consistent with the City noise ordinance. Ventilation openings shall be baffled and directed away from residential areas. Vibration resonance of operating equipment in the equipment enclosures shall be eliminated.

35. The Permittee shall place appropriate signage on the WCF as required by CAL-OSHA/FCC to the satisfaction of the Development Services Department.

36. Use of FRP material for purposes of concealing antennas shall not result in any noticeable lines or edges in the transition to the rest of the structure. All FRP shall be painted and textured to match the faux sandhopper.

INFORMATION ONLY:

- The issuance of this discretionary use permit alone does not allow the immediate commencement or continued operation of the proposed use on site. The operation allowed by this discretionary use permit may only begin or recommence after all conditions listed on this permit are fully completed and all required ministerial permits have been issued and received final inspection.

- A “Telecom Planning Inspection” will be required prior to Final Clearance from the City's Building Inspector to ensure compliance with the approved plans, exhibits, and associated conditions. Prior to calling for your Final Inspection from your building inspection official, please contact the Project Manager listed below at 619-446-5349 to schedule an inspection of the completed WCF. Please request the telecom inspection at least five working days ahead of the requested Final inspection.

- Any party on whom fees, dedications, reservations, or other exactions have been imposed as conditions of approval of this Permit, may protest the imposition within ninety days of the approval of this development permit by filing a written protest with the City Clerk pursuant to California Government Code section 66020.

- This development may be subject to impact fees at the time of construction permit issuance.

APPROVED by the Hearing Officer of the City of San Diego on May 28, 2014 and [Approved Resolution Number].
Permit Type/PTS Approval No.: NDP No. 1201845 and SDP No. 1201846
Date of Approval: 5/28/2014

AUTHENTICATED BY THE CITY OF SAN DIEGO DEVELOPMENT SERVICES DEPARTMENT

Alex Hempton, AICP
Development Project Manager

NOTE: Notary acknowledgment must be attached per Civil Code section 1189 et seq.

The undersigned Owner/Permittee, by execution hereof, agrees to each and every condition of this Permit and promises to perform each and every obligation of Owner/Permittee hereunder.

CHARLES K. WATSON
Owner

By
CHARLES K. WATSON

RONALD E. TAYLOR
Owner

By
RONALD E. TAYLOR

AT&T MOBILITY
Permittee

By
KEVIN BECKER
SR. REAL ESTATE & CONSTRUCTION MANAGER

NOTE: Notary acknowledgments must be attached per Civil Code section 1189 et seq.
NOTICE OF RIGHT TO APPEAL
ENVIRONMENTAL DETERMINATION
DEVELOPMENT SERVICES DEPARTMENT
SAP No. 24003999

PROJECT NAME/NUMBER: AT&T- Logan Heights/PTS 333926

COMMUNITY PLAN AREA: Southeastern San Diego

COUNCIL DISTRICT: 8

LOCATION: The project is located at 3034 Commercial Street, San Diego, CA 92113, in the SESDPD-I-1 zone within the Southeastern San Diego Community Planning area.

PROJECT DESCRIPTION: The new Wireless Communication Facility (WCF) would be located in an existing industrial yard, the project would consists of 12 antennas located inside a new 40 foot high faux sandhopper tank structure. Located adjacent would be the associated 288 square foot (sq. ft.) concrete masonry unit wall equipment enclosure.

ENTITY CONSIDERING PROJECT APPROVAL: Hearing Officer

ENVIRONMENTAL DETERMINATION: 15303 – (New construction or conversion of small structures)

ENTITY MAKING ENVIRONMENTAL DETERMINATION: City of San Diego

STATEMENT SUPPORTING REASON FOR ENVIRONMENTAL DETERMINATION: The City of San Diego conducted an initial review of this project and it was determined that the WCF meets the categorical exemption criteria set forth in the CEQA State Guidelines, Section 15303 (new construction or conversion of small structures), which allows for the construction of small facilities and the installation of new equipment in small structures. This WCF proposes a new 40 foot high faux sandhopper tank structure with 12 antennas and associated equipment enclosure located in an industrial yard. Since the project site is currently developed and lacks sensitive resources the exemption is appropriate and the exceptions listed in CEQA Section 15300.2 would not apply.

DEVELOPMENT PROJECT MANAGER: Alexander Hempton
MAILING ADDRESS: 1222 1st Avenue, MS 501, San Diego, CA 92101
PHONE NUMBER: (619) 446-5349
On April 16, 2014 the City of San Diego made the above-referenced environmental determination pursuant to the California Environmental Quality Act (CEQA). This determination is appealable to the City Council. If you have any questions about this determination, contact the City Development Project Manager listed above.

Applications to appeal CEQA determination made by staff (including the City Manager) to the City Council must be filed in the office of the City Clerk within 10 business days from the date of the posting of this Notice. That appeal deadline date is May 2, 2014. The appeal application can be obtained from the City Clerk, 202 'C' Street, Second Floor, San Diego, CA 92101.

This information will be made available in alternative formats upon request.
A recommendation from the Southeastern San Diego Community Planning Group is not available to meet the print deadline.
## Ownership Disclosure Statement

**Project Title:** SD 034 Logan Heights

**Project Address:**

3034 Commercial Street, San Diego, CA 92113

### Part I - To be completed when property is held by individual(s)

By signing the Ownership Disclosure Statement, the owner(s) acknowledge that an application for a permit, map, or other matter, as identified above, will be filed with the City of San Diego on the subject property, with the intent to record an encumbrance against the property. Please list below the owner(s) and tenant(s) (if applicable) of the above referenced property. The list must include the names and addresses of all persons who have an interest in the property, recorded or otherwise, and state the type of property interest (e.g., tenants who will benefit from the permit, all individuals who own the property). A signature is required of at least one of the property owners. Attach additional pages if needed. A signature from the Assistant Executive Director of the San Diego Redevelopment Agency shall be required for all project parcels for which a Disposition and Development Agreement (DDA) has been approved and executed by the City Council. Note: The applicant is responsible for notifying the Project Manager of any changes in ownership during the time the application is being processed or considered. Changes in ownership are to be given to the Project Manager at least thirty days prior to any public hearing on the subject property. Failure to provide accurate and current ownership information could result in a delay in the hearing process.

### Additional pages attached

- Yes
- No

#### Name of Individual (type or print):

- Charles K. Watson and Ronald Taylor, Trustees of Taylor Trust
- Donald J. Watson and Ronald Taylor, Trustees of Taylor Trust

#### Street Address:

- 16418 Falcon Heights Road
- Ramona, CA 92065

#### Phone No.:

- (619) 339-4612

#### Signature:

- Date: 11/18/2013

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Printed on recycled paper. Visit our web site at [www.sandiego.gov/redevelopment-services](http://www.sandiego.gov/redevelopment-services)

Upon request, this information is available in alternative formats for persons with disabilities.

36-316 7/06

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Page 1 of 2
AT&T Executives

Randall L. Stephenson  
Chairman and Chief Executive Officer

William A. Blase, Jr.  
Senior Executive Vice President - Human Resources

James W. Cicconi  
Senior Executive Vice President - External and Legislative Affairs, AT&T, Inc

Cathy M. Coughlin  
Senior Executive Vice President and Global Marketing Officer

Ralph de la Vega  
President and Chief Executive Officer - AT&T Mobility

John Donovan  
Senior Executive Vice President, AT&T Technology and Network Operations

Andrew M. Geisse  
Chief Executive Officer — AT&T Business Solutions

Lori Lee  
Senior Executive Vice President — Home Solutions

John T. Stankey  
Group President and Chief Strategy Officer

John Stephens  
Senior Executive Vice President and Chief Financial Officer

Wayne Watts  
Senior Executive Vice President and General Counsel
Photosimulation of proposed telecommunications site

These simulations are intended for graphical purposes only and not intended to be part of or to replace the information provided on the construction drawings.
PHOTO STUDY & KEY MAP

SD0252
Logan Heights
3034 Commercial Street
San Diego, CA 92113

Prepared for:
City of San Diego
Department of Planning
1222 First Avenue MS 301
San Diego, CA 92101

Prepared by:
PlanCom, Inc.
Contractor Representatives for
AT&T Wireless

302 State Place
Escondido, CA 92029
Contact: Shelly Kilbourn, Planning Consultant
(619) 208-4685

November 8, 2013
Looking at north elevation

Looking at south elevation
Looking at west elevation

Looking north from site
Looking south from site

Looking east from site
Looking west from site

Onsite Photo 1
Onsite Photo 6

South view of the facility
South view of the property

West view of the facility
PROJECT DESCRIPTION

The project proposes to locate a wireless communication facility at 3034 Commercial Street in the Southeastern San Diego Area. The project will consist of twelve (12) antennas located inside a 45 foot faux sandhopper. The associated equipment will be located inside an enclosure at the base of the sandhopper. The equipment enclosure is approximately 288 square feet and will require a deviation from the WCF regulations to exceed the 250 square foot restriction for equipment. The antennas and equipment are designed to match structures found on existing industrial properties in the area.

The property is zoned SESPDO I-2 and developed with an industrial warehouse. The property is surrounded by industrial and commercial development on all sides.

SITE DESIGN

The antennas will be located on a 45 foot faux sandhopper. The structure design is consistent with structures on surrounding industrial properties. The antennas will be concealed within the top of the sandhopper and will not be visible from any vantage points. The associated equipment will be located in an enclosure at the base of the structure.

PREFERENCE 1 LOCATION

The proposed facility is located on an industrial property which is a Preference 1 Location. A Process 3 Southeastern San Diego Development Permit is required because the project is located within the SESPDO. The project is located and designed to meet be consistent with all relevant regulations, be minimally visible from vantage points or surrounding properties and to meet the intent of Council Policy 600-43.

CO-LOCATION OF FACILITIES

No other wireless carriers are located on this property.
DATE OF NOTICE: May 13, 2014

NOTICE OF PUBLIC HEARING

HEARING OFFICER

DEVELOPMENT SERVICES DEPARTMENT

DATE OF HEARING: May 28, 2014
TIME OF HEARING: 8:30 A.M.
LOCATION OF HEARING: Council Chambers, 12th Floor, City Administration Building, 202 C Street, San Diego, California 92101
PROJECT TYPE: NEIGHBORHOOD DEVELOPMENT PERMIT (NDP) AND SITE DEVELOPMENT PERMIT (SDP), PROCESS 3
PROJECT NO: 333926
PROJECT NAME: AT&T - LOGAN HEIGHTS
APPLICANT: SHELLY KILBOURN, PLANCOM, INC., AGENTS REPRESENTING AT&T MOBILITY
COMMUNITY PLAN AREA: SOUTHEASTERN SAN DIEGO
COUNCIL DISTRICT: District 8
CITY PROJECT MANAGER: Alex Hempton, Development Project Manager
PHONE NUMBER/E-MAIL: (619) 446-5349 / ahempton@sandiego.gov

As a property owner, tenant, or person who has requested notice, please be advised that the Hearing Officer will hold a public hearing to approve, conditionally approve, or deny an application for a Wireless Communication Facility (WCF) consisting of a 40-foot tall faux sandhopper structure, concealing 12 panel antennas, and an equipment enclosure located adjacent to the structure. The project is located at 3034 Commercial Street.

The decision of the Hearing Officer is final unless appealed to the Planning Commission. In order to appeal the decision you must be present at the public hearing and file a speaker slip concerning the application or have expressed interest by writing to the Hearing Officer before the close of the public hearing. The appeal must be made within 10 working days of the Hearing Officer's decision. Please do not e-mail appeals as they will not be accepted. See Information Bulletin 505 "Appeal Procedure", available at www.sandiego.gov/development-services or in person at the Development Services Department, located at 1222 First Avenue, 3rd Floor, San Diego, CA 92101

The decision made by the Planning Commission is the final decision by the City.
This project was determined to be categorically exempt from the California Environmental Quality Act on April 16, 2014 and the opportunity to appeal that determination ended May 2, 2014.

If you wish to challenge the City's action on the above proceedings in court, you may be limited to addressing only those issues you or someone else have raised at the public hearing described in this notice, or written in correspondence to the City at or before the public hearing. If you have any questions after reviewing this notice, you can call the City Project Manager listed above.

This information will be made available in alternative formats upon request. To request an agenda in alternative format or to request a sign language or oral interpreter for the meeting, call Support Services at (619) 321-3208 at least five working days prior to the meeting to insure availability. Assistive Listening Devices (ALD's) are also available for the meeting upon request.

Internal Order Number: 24003999

Revised 04/08/10 HRD
SD0252 LOGAN HEIGHTS
3034 COMMERCIAL STREET
SAN DIEGO, CA 92113

PROJECT INFORMATION

The project consists of a proposed AT&T telecommunications site consisting of the following:

1. A tower of cut masonry, approximately 130 feet high, and co-located equipment to be located in a lease with the County of San Diego, County of Los Angeles, and the City of San Diego.

TOWER SITE: H cooler C, AT&T

The property will enhance the overall value, safety, and security of the community in the location. The owner will provide future access to cellular service.

PROJECT DESCRIPTION

The property shall comply with the California Building Code, 2009 edition (which adopts the most recent edition of the California Building Code).

NOTE: COMMUNICATIONS FACILITIES WILL ENHANCE THE OVERALL VALUE, SAFETY, AND SECURITY OF THE COMMUNITY IN THE LOCATION.

CONTACTS

AT&T

Ravi Jindal
San Diego, CA
619.299.4250

San Acquisitions

Joy Emitter
Palomar Inc.

Project Applicant:

At&t

Pacific Center Blvd.
San Diego, CA
619.299.4250

DAUGHERTY REPRESENTATIVE

PLANNED

San Diego, CA
619.299.4210

LEGAL DESCRIPTION

All real estate real property located in the County of San Diego, State of California, and at the approximate location of 3034 Commercial Street, City of San Diego, County of San Diego, State of California.

LEGAL DESCRIPTION:

LEGAL DESCRIPTION

ADDITIONS

SPECIAL INSPECTIONS

ADA COMPLIANCE

APPROVALS

SHEET INFORMATION

ATTACHMENT 14
EXISTING 'RHUS RANCEA' (AFRICAN SUMAC) STREET TREE (TYP. OF 2).

PROPOSED TRENCH FOR POWER & TELCO.

PROPOSED 40' HIGH FAUX (LITE) ANTENNAS, (24)

PROPOSED GPS (TYP. OF 2 TOTAL)

PROPOSED 120"-0" OMU EQUIPMENT

EXISTING CHAINLINK FENCE, TYP.

EXISTING CHAINLINK FENCE, TYP.

EXISTING PALM TREE TO REMAIN, TYP.

ATTACHMENT 14

ARCHITECT DONATO ASSOCIATES

DRAFTING + GRAPHICS

1.302,07

PLOT SCALE

1:1 (24X36 '0' SIZE)
EXISTING BUILDING
SOUTH ELEVATION

PROPOSED FAUX TANK STRUCTURE
PROPOSED RF-FRIENDLY FAUX TANK W/ (12) PROPOSED AT&T ANTENNAS AND (24) PROPOSED RRUS

EXISTING BUILDING
EAST ELEVATION
NEW A/C CONDENSING UNITS PER MECHANICAL

NEW A/C PAN COIL UNITS PER MECHANICAL (TYP. OF 2)

NEW AT&T EQUIPMENT SHELTER

CABLE TRAY ABOVE (TYP. OF 4), SELECTED

NEW 23" ARGUS BATTERY RACK, MOUNT PER

NEW 23" ARGUS POWER RACK, MOUNT PER

NEW INTERCEPT ELECTRICAL PANEL

NEW MASTER GROUND BAR, TYP. OF 2

NEW INTERIOR LIGHTS: 4 FT, 2 BULB, FLUORESCENT; TYP. FOR 4

NEW 24" CABLE TRAY HANGING ASSEMBLY; SEE

NEW A/C CONDENSING UNIT FOR MECHANICAL

NEW EXISTING PARK RESTROOM WALL MOUNTED EXTERIOR LIGHT FIXTURES TO MATCH

NEW 3'-0" MECHANICAL DOOR, FRAME, AND HARDWARE WITH PEEPHOLE AND ELECTRONIC COMBO LOCKSET; PAINT TO MATCH EXISTING

NEW PHONE BOARD

NEW ALARM STRIP AND LOW/HIGH TEMP ALARM BELOW MOUNTED ON PHONE BOARD

NEW ELEVATION HEIGHTS (SEE ELEVATION DETAILS FOR ALL MEASUREMENTS)

ATTACHMENT 14

ATTACHMENT 14

ATTACHMENT 14