

THE CITY OF SAN DIEGO

Report to the Hearing Officer

DATE ISSUED:

August 2, 2017

REPORT NO. HO-17-050

HEARING DATE:

August 9, 2017

SUBJECT:

T-MOBILE VIA SONOMA ROW. Process Three Decision

PROJECT NUMBER:

533991

OWNER/APPLICANT:

City of San Diego/T-Mobile

SUMMARY

<u>Issue</u>: Should the Hearing Officer approve a Wireless Communication Facility located on the 8400 block of Via Sonoma in the public right-of-way within the University Community Planning area?

Staff Recommendation: APPROVE Conditional Use Permit No. 1970564.

<u>Community Planning Group Recommendation</u>: On June 19, 2017, the University Community Planning Group voted 15-2-0 to recommend approval of the proposed project without conditions (Attachment 8).

<u>Environmental Review</u>: The project was determined to be exempt pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15301 (Existing Facilities). This project is not pending an appeal of the Environmental Determination. The <u>Environmental Exemption Determination</u> for this project was made on April 17, 2017, and the opportunity to appeal that determination ended May 1, 2017 (Attachment 7).

BACKGROUND

T-Mobile is proposing to maintain an existing Wireless Communication Facility (WCF) that is located on the 8400 block of Via Sonoma within the public-right-of-way (PROW), in the RM-2-5 zone of the University Community Planning area. The location of this WCF, as well as the carrier's coverage objectives, is focused on commuters traveling on Interstate 5 to the east and residential uses to the north, to the south and to the west (Attachment 1, 2, and 3).

<u>Council Policy 600-43</u> assigns preference levels to WCFs proposed on different land uses. Since the WCF is located within the PROW, it is identified as a Preference 1 location. This is considered the

most preferred location and applicants are strongly encouraged to site a facility in the PROW before pursuing a Preference 2 Location.

The WCF consists of three panel antennas concealed inside a 15-inch-diameter radome within a 30-foot-tall light standard. The equipment associated with this WCF is located inside an underground vault immediately adjacent to the light standard with two above-ground vents. No changes are being proposed as part of this application.

This project was originally approved on August 6, 2007 under Neighborhood Use Permit No. 385945. This permit included a ten year expiration date. This condition is consistently applied to all wireless facilities that are not completely concealed. The purpose and intent of this condition is to allow the City to analyze the WCF design with the current surrounding developments in addition to any advancements in designs and innovations.

The City does not have a procedure to renew permits; instead, applicants are required to submit new applications for expiring permits. Additionally, the project as a whole shall be reviewed in accordance with the current regulations, City policies, General Plan, and the latest WCF Design Guidelines. Normally, WCFs located within a Preference 1 location will result in a Process 1 staff-level decision. However, this only applies for WCF located in the ROW and attached onto an existing vertical structure (City-standard light standard, SDG&E utility pole, etc.). Since this WCF required a replacement pole that is larger than a City light standard in diameter, the replacement pole is therefore considered to be equipment housing the antennas, with a secondary use as a light standard. According to the current regulations and pursuant to Land Development Code Section 141.0420(e)(3), the project as designed requires a Conditional Use Permit, Process Three, Hearing Officer decision.

Community/General Plan Analysis

The <u>University Community Plan</u> does not specifically address wireless facilities; however, the City's General Plan addresses Wireless Facilities in the <u>Urban Design Element (UD-A.15)</u>. The visual impact of WCFs should be minimized by concealing them in existing structures, or using 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. Equipment associated with the WCF should be located inside underground vaults or unobtrusive structures.

The T-Mobile WCF design meets the intent of UD-A.15 by concealing the antennas within the radome on the uppermost portion of the 30-foot tall light standard. T-Mobile will also be repainting the radome to better match the lower portion of the light standard as a condition of approval. The equipment associated with this project is located inside an underground vault which is consistent with the General Plan. Therefore, the WCF as a whole meets the objectives of the General Plan.

DISCUSSION

Based on its design, the project complies with the WCF Regulations (SDMC 141.0420) and the WCF Design Guidelines. Staff has prepared draft findings in the affirmative to approve the CUP and recommends approval of the T-Mobile Via Sonoma ROW project (Attachment 5).

ALTERNATIVES

- 1. Approve CUP No. 1970564 with modifications.
- 2. Deny CUP No. 1970564, if the Hearing Officer makes findings based on substantial evidence that the approval is not authorized by state or local zoning law.

Respectfully submitted,

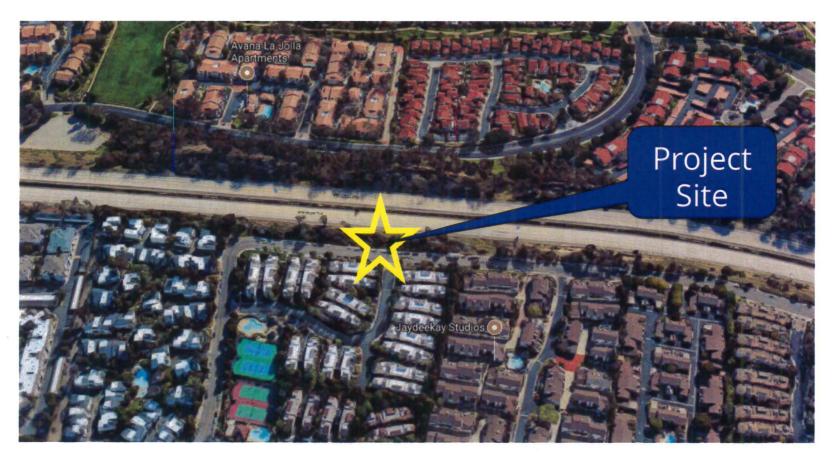
Simon Tse, Development Project Manager

Attachments:

- 1. Aerial Photograph
- 2. Community Plan Land Use Map
- 3. Project Location Map
- 4. Project Data Sheet
- 5. Draft Resolution with Findings
- 6. Draft Permit with Conditions
- 7. Environmental Exemption
- 8. Community Planning Group Recommendation
- 9. Ownership Disclosure Statement
- 10. Site Justification
- 11. Coverage Maps
- 12. Photo Survey
- 13. Project Plans



Aerial Photo

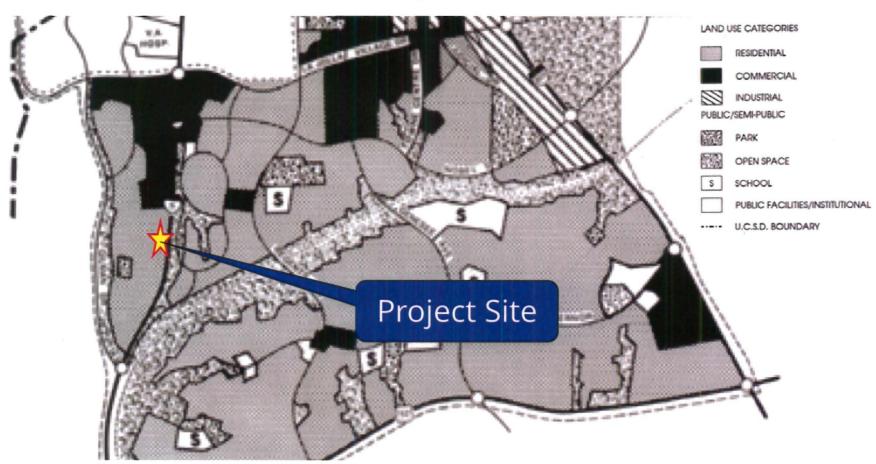


<u>T-Mobile Via Sonoma ROW (University Community)</u> 8400 Block of Via Sonoma, San Diego, CA 92037





Community Plan

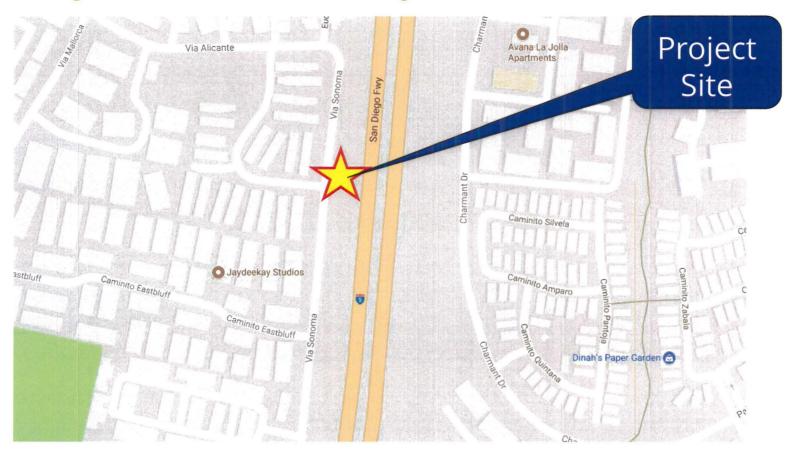


T-Mobile Via Sonoma ROW (University Community) 8400 Block of Via Sonoma, San Diego, CA 92037





Project Location Map



T-Mobile Via Sonoma ROW (University Community) 8400 Block of Via Sonoma, San Diego, CA 92037



PROJECT DATA SHEET				
PROJECT NAME:	T-Mobile Via Sonoma ROW			
PROJECT DESCRIPTION:	A Wireless Communication Facility located on the 8400 block of Via Sonoma Right-of-Way (ROW) consisting of a 30-foot tall light standard supporting three antennas inside a 15-inch raydome, painted and textured to match the surface of the pole. The equipment associated with this project is located inside an under-ground vault with two above ground vents, painted to match the existing landscaping.			
COMMUNITY PLAN AREA:	University	=		
DISCRETIONARY ACTIONS:	Conditional Use Permit			
COMMUNITY PLAN LAND USE DESIGNATION:	Residential			
ZONING INFORMATION:				
	ROW – N/A ROW – N/A ROW – N/A			
ADJACENT PROPERTIES:	LAND USE DESIGNATION & ZONE	EXISTING LAND USE		
NORTH:	Residential; RM-2-5	Interstate 5;Residential		
SOUTH:	Residential; RM-2-5	Interstate 5;Residential		
EAST:	Residential; RM-1-1/RM-2-5	Interstate 5		
WEST:	Residential; RM-3-7/RM-2-5	Residential		
DEVIATION REQUESTED:	None.			
COMMUNITY PLANNING GROUP RECOMMENDATION:	On June 9, 2017, the University Community Planning Group voted 15-2-0 to recommend approval of the T-Mobile Via Sonoma ROW project without any conditions.			

HEARING OFFICER RESOLUTION NO. ______ CONDITIONAL USE PERMIT NO. 1970564 T-MOBILE VIA SONOMA ROW - PROJECT NO. 533991

WHEREAS, CITY OF SAN DIEGO, Owner and T-MOBILE, Permittee, filed an application with the City of San Diego for a permit for a Wireless Communication Facility (as described in and by reference to the approved Exhibits "A" and corresponding conditions of approval for the associated Permit No. 1970564); and

WHEREAS, the project site is located on the street light easement on the 8400 block of Via Sonoma in the RM-2-5 zone of the University Community Planning area; and

WHEREAS, the project site is legally described as: Right-of-Way owned by the City of San Diego on the 8400 block of Via Sonoma; and

WHEREAS, on August 9, 2017, the Hearing Officer of the City of San Diego considered Conditional Use Permit No. 1970564 pursuant to the Land Development Code of the City of San Diego; and

WHEREAS, on April 17, 2017, 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 15301 (Existing Facilities) and there was no appeal of the Environmental Determination filed within the time period provided by San Diego Municipal Code Section 112.0520;

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 August 9, 2017.

FINDINGS:

§126.0305 Findings for Conditional Use Permit Approval

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

The University Community Plan did not contemplate Wireless Communication Facilities (WCF) when it was adopted in 1986, however, the City of San Diego's General Plan (UD-15) requires that the visual impact of wireless facilities be minimized by concealing wireless facilities inside existing structures or using screening techniques to hide or blend them into the surrounding area. The plan also calls for these facilities to be designed to be aesthetically pleasing and respectful of the neighborhood context. Furthermore, the plan states that equipment associated with wireless facilities shall be concealed from view.

This existing WCF is located on the 8400 block of Via Sonoma within the Public-Right-Of-Way (PROW). The WCF design consists of a 30-foot-tall light standard concealing a total of three antennas inside a 15-inch diameter radome, painted and textured to match the surface of the

light pole. Furthermore, the connections to and from the antennas in addition to the mounting apparatus are concealed within the pole minimizing all visual impacts. The equipment associated with this project is located inside an underground vault with two above-ground vents. These vents are located within an existing landscaped area and painted dark green to help blend in with the surrounding shrubs.

Pursuant to Land Development Code (LDC) Section 141.0420(e)(2), the project requires a Conditional Use Permit (CUP), Process 3, Hearing Officer decision. As designed, the WCF complies with the City's LDC Section 141.0420, Wireless Communication Facilities, the WCF Design Guidelines, as well as the requirements of the City's General Plan. The proposed WCF will not adversely affect the applicable land use plan or the City's General Plan.

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

The project is located on the 8400 block of Via Sonoma in the University Community Plan area. The WCF consists of a 30-foot-tall light standard supporting three panel antennas concealed inside a 15-inch diameter radome, painted and textured to match the surface of the light pole. The equipment enclosure associated with this project is located inside an underground vault with two above-ground vents.

The project was determined to be exempt from CEQA pursuant to Section 15301 (Existing Facilities). 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.

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." An Electromagnetic Energy Exposure Report was prepared, which concluded that the project is in compliance with FCC standards for RF emissions. Therefore, the project will not result in any significant health or safety risks to the surrounding area within matters of the City's jurisdiction.

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

The project site is located within the RM-2-5 zone of the University Community Plan. The project meets all applicable requirements of this zone. The WCF Regulations (LDC Section 141.0420) contain design requirements for WCFs, which include the requirement to utilize the smallest, least visually intrusive antennas, components and other necessary equipment and to use all reasonable means to conceal or minimize the visual impacts of the wireless communication facilities through integration. Integration with existing structures or among other existing uses shall be accomplished through the use of architecture, landscape and siting solutions.

T-Mobile's design uses all reasonable means to minimize the WCF by limiting the site to only three antennas and concealing them inside a 15-inch radome that is located on a 30-foot-tall light standard. The radome maintains a slender profile with the cables and mounting apparatus all concealed from views. The exterior of the radome will be painted and textured to match the existing aggregate surface of light pole. The equipment associated with this WCF is located inside an existing 57-square-foot underground vault with two above-ground vents. The vents are painted dark green and is surrounded by existing landscaping for screening. The landscape in and around the general vicinity serves as a backdrop integrating the existing vents into the setting.

Because the project meets the requirements of the RM-2-5 zone, and findings can be made in the affirmative for all permits required by this project, the project and the integration deviation will comply with the applicable regulations of the LDC.

4. The proposed use is appropriate at the proposed location.

T-Mobile is proposing to maintain an existing WCF on the 8400 block of Via Sonoma within the PROW. A site justification analysis was prepared by the applicant demonstrating a need for this WCF. According to the justification analysis, this macro site provides improvements to the existing coverage for both the residential uses to the west, to the north and to the south and commuters on Interstate 5. Additionally, the WCF is appropriately designed at the proposed location and integrates as a functional street light standard that is consistent with other nearby light standards in both the height and the type of pole. In accordance with Council Policy 600-43, WCF is encouraged in the PROW and is considered a Preference 1 location (most preferred location). However, due to the design of the pole which required a replacement pole of a larger diameter, the WCF is considered an above-ground equipment and requires a Process 3, Hearing Officer Decision.

The equipment associated with this project will continue to operate inside an underground vault with two above-ground vents. This design is consistent with the City's General Plan for wireless facilities that encourages the placement of underground vault to minimize visual impacts. The underground vault is appropriately placed away from the sidewalk and the above-ground vents are set back and screened by the surrounding landscaping. There are currently no plans to expand and/or further develop this area of the right of way. However, a 10-year expiration will be included as a condition of approval to ensure that the design and use is still appropriate at that time. As demonstrated by both the justification analysis and the design prepared by T-Mobile, the existing WCF use is appropriate at the proposed PROW location.

BE IT FURTHER RESOLVED that, based on the findings hereinbefore adopted by the Hearing Officer, Conditional Use Permit No. 1970564 is hereby GRANTED by the Haring Officer to the referenced Owner/Permittee, in the form, exhibits, terms and conditions as set forth in Permit No. No. 1970564, a copy of which is attached hereto and made a part hereof.

ATTACHMENT 5

Simon Tse Development Project Manager Development Services

Adopted on: August 9, 2017

3-3-16

RECORDING REQUESTED BY
CITY OF SAN DIEGO
DEVELOPMENT SERVICES
PERMIT INTAKE, MAIL STATION
501

WHEN RECORDED MAIL TO PROJECT MANAGEMENT PERMIT CLERK MAIL STATION 501

INTERNAL ORDER NUMBER:

SPACE ABOVE THIS LINE FOR RECORDER'S USE

CONDITIONAL USE PERMIT NO. 1970564 **T-MOBILE VIA SONOMA ROW PROJECT NO. 533991**HEARING OFFICER

This Conditional Use Permit No. 1970564 is granted by the Hearing Officer of the City of San Diego to the City of San Diego, Owner, and T-Mobile West Corporation, Permittee, pursuant to San Diego Municipal Code [SDMC] sections 126.0305, 131.0401, and 141.0420. The project site is located on the street light easement in the 8400 block of Via Sonoma in the public right-of-way in the RM-2-5 zone of the University Community Planning area. The project site is legally described as: Right-of-Way owned by the City of San Diego in the 8400 block of Via Sonoma.

Subject to the terms and conditions set forth in this Permit, permission is granted to Owner and Permittee to maintain an existing Wireless Communication Facility (WCF) described and identified by size, dimension, quantity, type, and location on the approved exhibits [Exhibit "A"] dated August 9, 2017, on file in the Development Services Department.

The project shall include:

- a. A WCF consisting of a 30-foot tall light standard supporting three panel antennas inside a 15-inch diameter radome, painted and textured to match the surface of the aggregate light pole;
- b. Three antennas with the following dimensions: 59" by 11.9" by 6.3";
- c. One GPS mounted antenna;
- d. A 57-square foot underground equipment vault with two above-ground vents. The vents shall be painted dark green to match the adjacent landscaping to the satisfaction of the Development Services Department;
- e. 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 August 23, 2020.
- 2. This Conditional Use Permit [CUP] and corresponding use of this site shall expire on **August 23, 2027**. 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 approval, the Owner/Permittee may submit a new application to the Development Services Department 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 WCF purposes beyond the permit expiration date. Use of this permit approval 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 Permittee shall secure all necessary building permits. The 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.
- The Permittee shall defend, indemnify, and hold harmless the City, its agents, officers, and 13. 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 Permittee of any claim, action, or proceeding and, if the City should fail to cooperate fully in the defense, the 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, 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 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 Permittee shall not be required to pay or perform any settlement unless such settlement is approved by Permittee.

LANDSCAPE REQUIREMENTS:

- 14. If any required landscape (including existing or new plantings, hardscape, landscape features, etc.) indicated on the approved construction document plans is damaged or removed during demolition or construction, the Permittee shall repair and/or replace it in kind and equivalent size per the approved documents to the satisfaction of the Development Services Department within 30 days of damage.
- 15. If trees with a trunk width of 4 inches or more (measured by caliper, 4 feet above grade) are removed or significantly trimmed for the installation or operation of the wireless communication

facility, then replacement trees of a similar size shall be planted to the satisfaction of the Development Services Department.

16. The Permittee shall be responsible for the maintenance of all landscape improvements shown on the approved plans, including in the right-of-way, unless long-term maintenance of said landscaping will be the responsibility of a Landscape Maintenance District or other approved entity. All required landscape shall be maintained consistent with the Landscape Standards in a disease, weed and litter free condition at all times. Severe pruning or "topping" of trees is not permitted unless specifically noted in this Permit.

PLANNING/DESIGN REQUIREMENTS:

- 17. Any future modifications to the antennas must be approved by Development Services. Antennas deviating up to the approved size (length, width, or height), must include screening designed to create the appearance of uniformity among the antennas to the satisfaction of the Development Services Department.
- 18. The Permittee shall provide evidence demonstrating compliance with Federal standards for radio frequency emissions in accordance with the Telecommunications Act of 1996 and any subsequent amendments.
- 19. Every aspect of this project is considered an element of concealment including but not limited to the dimensions, bulk and scale, color, materials and texture. Any future modifications to this permit must not defeat concealment.
- 20. 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.
- 21. The Fiberglass Reinforced Panel radome shall be repainted to match the existing surface of the aggregate light pole to the satisfaction of the Development Services Department.
- 22. The two above-ground vents shall be painted dark green to integrate with the existing surrounding landscaping to the satisfaction of the Development Services Department.
- 23. All antennas, mounting apparatus, and cables shall be concealed inside the existing radome and light pole to the satisfaction of the Development Services Department.

INFORMATION ONLY:

- A Telecom Inspection is required prior to construction permit completion.
- The City of San Diego reserves the right to rescind any approval made under Section 6409(a) or the Spectrum Act should any portion of Section 6409(a) or the Spectrum Act, of the FCC's

interpretation thereof, be deemed unconstitutional by a court of law, the FCC or any other competent authority.

- Per LDC §59.5.0404 Construction Noise (a), It shall be unlawful for any person, between the
 hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as
 specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day
 and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or
 repair any building or structure in such a manner as to create disturbing, excessive or
 offensive noise unless a permit has been applied for and granted beforehand by the Noise
 Abatement and Control Administrator.
- The issuance of this discretionary permit alone does not allow the immediate commencement
 or continued operation of the proposed use on site. Any operation allowed by this
 discretionary 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.
- 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 August 9, 2017 and [Approved Resolution Number].

ATTACHMENT 6

Conditional Use Permit No. 1970564 August 9, 2017

AUTHENTICATED BY THE CITY OF SAN DIEGO DE	EVELOPMENT SERVICES DEPARTMENT
Simon Tse Development Project Manager	
NOTE: Notary acknowledgment must be attached per Civil Code section 1189 et seq.	
	tion hereof, agrees to each and every condition of every obligation of Owner/Permittee hereunder.
	CITY OF SAN DIEGO Owner
	By NAME TITLE
	T-MOBILE WEST CORPORATION Permittee
	By NAME TITLE

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

(Check one or both)	NOTICE OF EXEMPTION
TO:X Recorder/County Clerk P.O. Box 1750, MS A-33 1600 Pacific Hwy, Room San Diego, CA 92101-2 Office of Planning and I 1400 Tenth Street, Room Sacramento, CA 95814	San Diego, CA 92101 esearch
Project Name: T-Mobile Via Sonoma C	Project No.: 533991
Project Location-Specific: The project	is located at 8400 Via Sonoma, San Diego, CA 92037.
Project Location-City/County: San D	go/San Diego
application to maintain an existing Wir of-Way. The WCF supports 3 antennas associated with this project is located i	the Project: The project proposes a Conditional Use Permit (CUP) ess Communication Facility (WCF) located within the Via Sonoma Right oncealed inside a radome on a 30-foot light standard. The equipment side an equipment vault with two air vents. The project is not proposin oject site is designated for residential uses in the University Communit
Name of Public Agency Approving Pr	ject: City of San Diego
Name of Person or Agency Carrying	ut Project: Richard Dail SAC Wireless 5865 Avenida Encinas, Ste 142B Carlsbad, CA 92008 (858) 200-6541
Exempt Status: (CHECK ONE) () Ministerial (Sec. 21080(b)(1); 15 () Declared Emergency (Sec. 21080(c)) () Emergency Project (Sec. 21080(c)) (X) Categorical Exemption: CEQA Sec. 21080(c)	(b)(3); 15269(a));)(4); 15269 (b)(c))
proposed project is exempt from CEQA operation, repair, maintenance, permit private), involving negligible or no expaproposed project, a CUP for an existing	ity conducted an environmental review which determined that the oursuant to CEQA Guidelines Section 15301, which allows for the ng, leasing, licensing, or minor alteration of existing facilities (public or sion of use beyond that existing at the time of the determination. The NCF, is not an expansion of use. No environmental impacts were itionally, none of the exceptions described in CEQA Guidelines Section
Lead Agency Contact Person: Anna L.	McPherson, AICP Telephone: (619) 446-5276
If filed by applicant: 1. Attach certified document of exe 2. Has a notice of exemption been f	option finding. ed by the public agency approving the project? ()Yes ()No

Revised May 2016

ATTACHMENT 7

It is hereby certified that the City of San Diego has d	etermined the above ac	tivity to be exempt from CEQA
ana L. M. Merson	/Senior Planner	May 1, 2017
Signature/Title		Date
Check One: (X) Signed By Lead Agency () Signed by Applicant	Date Receive	d for Filing with County Clerk or OPR:



City of San Diego Development Services 1222 First Ave., MS-302 San Diego, CA 92101

Community Planning Committee Distribution Form Part 2

THE CITY OF SAN DIEGO

Project Name:			Project Number:		lumber:	Distribution Date:
T-Mobile Via Sonoma CUP-ROW			533991			4/17/2017
Project Scope/Location:						
REVISE - A Conditional Use Permit (Process 3) application to maintain an existing Wireless Communication Facility (WCF) located within the Via Sonoma Right -of-Way. The WCF supports 3 antennas concealed inside a radome on a 30-foot light standard. The equipment associated with this project is located inside an equipment vault with two air vents. The project is not proposing any changes. The project is located in the RM-2-5 zone of the University Community Planning area - Council District 1.						
Applicant Name:			Applicant Phone Number:		hone Number:	
Dail Richard					858.200.654	1
Project Manager:	Pho	ne Number	r:	Fax	Number:	E-mail Address:
Simon Tse	(619)	687-598	4	(619) 321-3200	stse@sandiego.gov
Committee Recommendations (To be completed for Initial Review):						
Vote to Approve		Members 15		M	embers No	Members Abstain A Tain
Vote to Approve With Conditions Listed Below		Members	Yes	M	embers No	Members Abstain
Vote to Approve With Non-Binding Recommendations Listed Below		Members	Yes	s Members No		Members Abstain
Vote to Deny		Members	Yes	M	embers No	Members Abstain
No Action (Please specify, e.g., Need further information, Split vote, Lack of quorum, etc.)				Continued		
NAME: anoy KRUBOR TITLE: Chair						
SIGNATURE: anaut Muses DATE: 6/19/17						
Attach Additional Pages If Necessary. Please return to: Project Management Division City of San Diego Development Services Department 1222 First Avenue, MS 302 San Diego, CA 92101 Printed on recycled paper. Visit our web site at www.sandiego.gov/development-services.			t-services.			
Printed on recycled paper. Visit ou			_	- Commercial Contraction of the	the same of the sa	The state of the s



City of San Diego Development Services 1222 First Ave., MS-302 San Diego, CA 92101

Community Planning Committee Distribution Form Part 1

THE CITY OF SAN DIEGO

Project Name:	Project Number:	Distribution Date:
T-Mobile Via Sonoma CUP-ROW	533991	4/17/2017

Project Scope/Location:

REVISE - A Conditional Use Permit (Process 3) application to maintain an existing Wireless Communication Facility (WCF) located within the Via Sonoma Right -of-Way. The WCF supports 3 antennas concealed inside a radome on a 30-foot light standard. The equipment associated with this project is located inside an equipment vault with two air vents. The project is not proposing any changes. The project is located in the RM-2-5 zone of the University Community Planning area - Council District 1.

Applicant Name:		Applicant Phone	Number:	
Dail Richard		858.200.6541		
Project Manager:	Phone Number:	Fax Number:	E-mail Address:	
Simon Tse	(619) 687-5984	(619) 321-3200	stse@sandiego.gov	

Project Issues (To be completed by Community Planning Committee for initial review):

Attach Additional Pages If Necessary.

Please return to: Project Management Division City of San Diego Development Services Department 1222 First Avenue, MS 302 San Diego, CA 92101

Printed on recycled paper. Visit our web site at www.sandiego.gov/development-services. Upon request, this information is available in alternative formats for persons with disabilities.

City Consent Application

1/12/17
(Date)
Ms. Enza Charles Real Estate Assets Department The City of San Diego 1200 Third Avenue, Suite 1700 San Diego, California 92101
RE: Site Address: 8400 Via Sonoma, San Diego, CA 92037 San Diego (the "Property") Site Name: T-Mobile SD07003A (Via Sonoma ROW)
Agreement: Lease Agreement, dated October 24, 2007 (the "Lease") between The City of
San Diego ("City") and T-Mobile West LLC , ("Lessee").
Dear Ms. Charles,
As part of the continuous effort to keep its network up to date, T-Mobile would like to perform the following modifications (changes) as described in the attached plans, to the site referenced above:
Example:
Antennas: Sector "A": Relocate four (4) six foot antennas from the water tank to the screened enclosure located on top of the equipment shelter; Sector "B": Replace the four (4) existing four foot antennas located on the water tank with six foot antennas. In order to accommodate the larger antennas, the screen boxes will be increased from six feet in length to eight feet.
Equipment: Remove existing Propane Generator. Install one 30KW Diesel Generator in a 12' x 11'4" area. Said area to be enclosed with a ten (10) foot tall CMU block wall Said Units to be screened by a four (4) foot tall CMU block wall.
Continued use and operation of an existing wireless telecommunications facility: Consisting of [3] existing panel antennas, concealed in a radome, mounted to a street light, with an underground equipment vault.
Real Estate Assets

construct any improvements, structures, or installations on the Premises, or make any alterations to the Premises (with the exception of equipment replacements or repairs) without City's prior written approval." In order to comply with such requirement, the items described above. would like to request City's consent and approval to complete Sincerely, Dail Richard _____, agent for T-Mobile Applicant's Signature: City Real Estate Assets _department has provided it's consent and approval to _{allow} T-Mobile to perform the proposed modifications described herein. Signature Date CITY OF SAN DIEGO, ACKNOWLEDGEMENT AND CONSENT FOR MODIFICATION OF (Site Location) By:

Pursuant to Improvements and Alterations, of the Lease Agreement, "Lessee shall not



ATTACHMENT 10



T-Mobile Project Name: SD07003A

City of San Diego Wireless Telecommunications Facility Project Information and Background

Efforts are currently underway in the City of San Diego to establish and maintain the required infrastructure for T-Mobile's wireless network. T-Mobile has retained the services of SAC Wireless to facilitate the land use entitlement process. T-Mobile is requesting approval for the continued operation and entitlement renewal of an existing T-Mobile wireless telecommunications facility. The original permit is set to expire in the coming months and a new one is requested. The following project information is submitted for your consideration:

Project Location

Address:

8400 Via Sonoma, San Diego, CA 92037

APN:

Right-of-Way, across from 346-801-25-09

Project Representative for T-Mobile

Dail Richard
SAC Wireless
5015 Shoreham Place, Suite 150
San Diego, CA 92122
(858)200-6541
Dail.Richard@sacw.com

Project Description

T-Mobile proposes the continued operation and entitlement renewal of an existing wireless telecommunications facility, with no proposed changes. This facility was originally approved via PTS 114535 / Approval ID 385945. Current entitlements are for [3] antennas, concealed within a radome, mounted on a street light, with an underground equipment vault.

The proposed project takes advantage of an existing facility, eliminating the need for a separate wireless telecommunications facility in the immediate area. The existing use and site characteristics will remain unchanged. In addition, the existing antennas are concealed within a radome and integrated into a street light, as required by the previous permit, therefore the proposed design adheres to the development standards as set forth by the City of San Diego.

The facility will be unmanned, and therefore, will not create any traffic. Maintenance personnel will visit the site every 4-6 weeks to ensure the site is functioning properly and being maintained. The facility will not create any hazardous materials, waste, odor, light, or glare.

Alternative Site Analysis / Collocation

This location already serves as a current city-approved wireless telecommunications facility for T-Mobile. Although a new permit is being sought, the standard requirement for an alternate site analysis does not apply. Since the existing facility can meet the area's objective goals for T-Mobile, continuing to utilize this location is preferred. The included coverage maps outline the gap in coverage that would exist without this facility, showing the necessity for this facility in this location.

Pursuing a new location would require extensive site acquisition and RF Engineering efforts in identifying,

ATTACHMENT 10



contacting, and negotiating with different properties. In addition to the extensive amount of time it would take to identify, entitle, permit, and construct a new facility, the cost would represent an unnecessary burden for T-Mobile. And the relocation to a new property could result in the redundancy of equipment during and for a short time after construction, to ensure that members of the community could continue to utilize T-Mobile's wireless network without interruption.

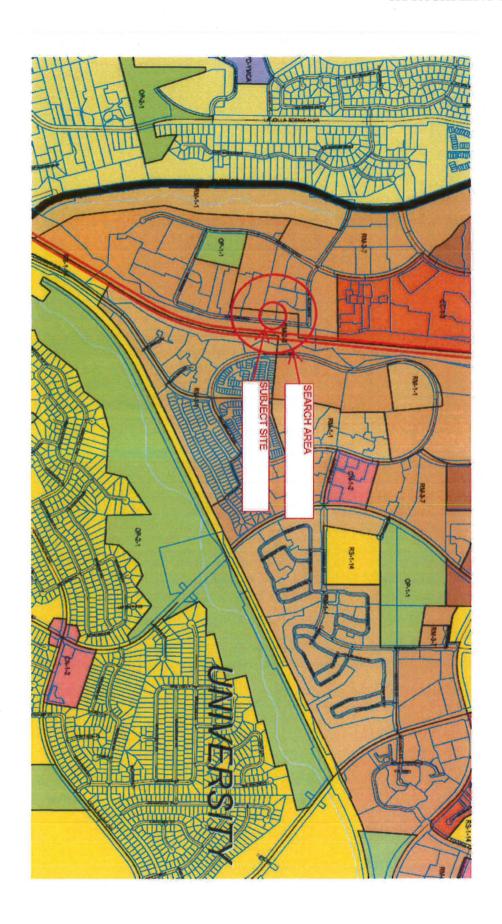
It is for these reasons that T-Mobile is requesting to continue using the existing facility's location.

Landscaping

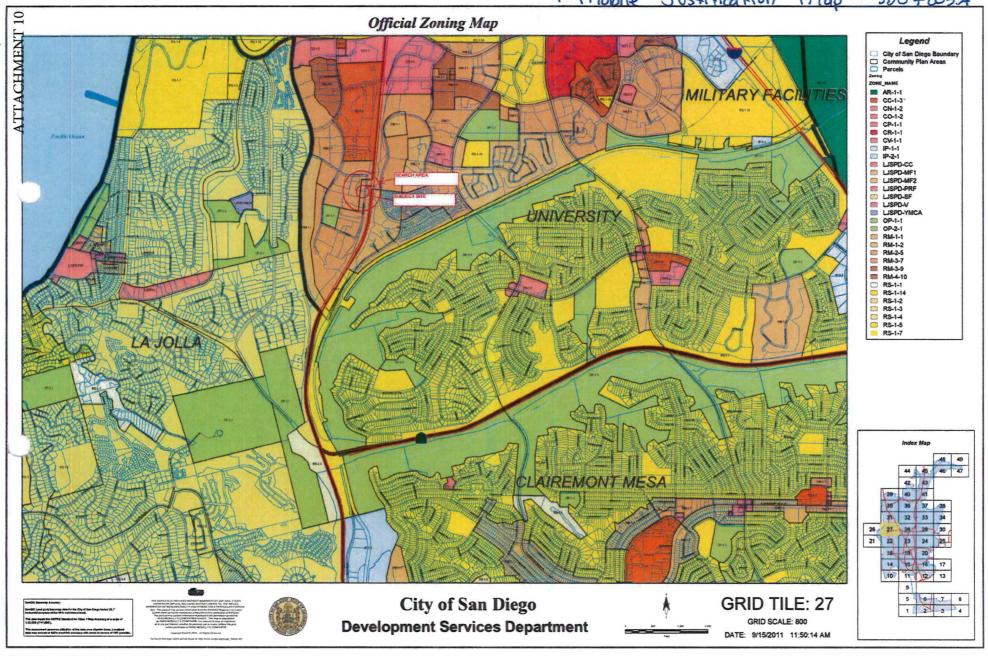
Since this is an existing wireless telecommunications facility with no change to the footprint, size, or design of the site, no landscaping is proposed. Additional landscaping should not be required, as the facility is already existing and any landscaping conditions would have already been addressed. The project is located in the ROW on highly developed land. Due to the underground equipment vault, landscaping is not feasible above that location. Landscaping is already present in nearby areas and surrounding properties in the form of extensive shrubs, and trees. In addition, the antennas are completely concealed in a radome, and the equipment is hidden underground. Landscaping would not add to the concealment/integration elements of the facility. Therefore, the existing concealment elements are fully integrated into the existing architecture of the site.

Respectfully submitted,

Dail Richard SAC Wireless

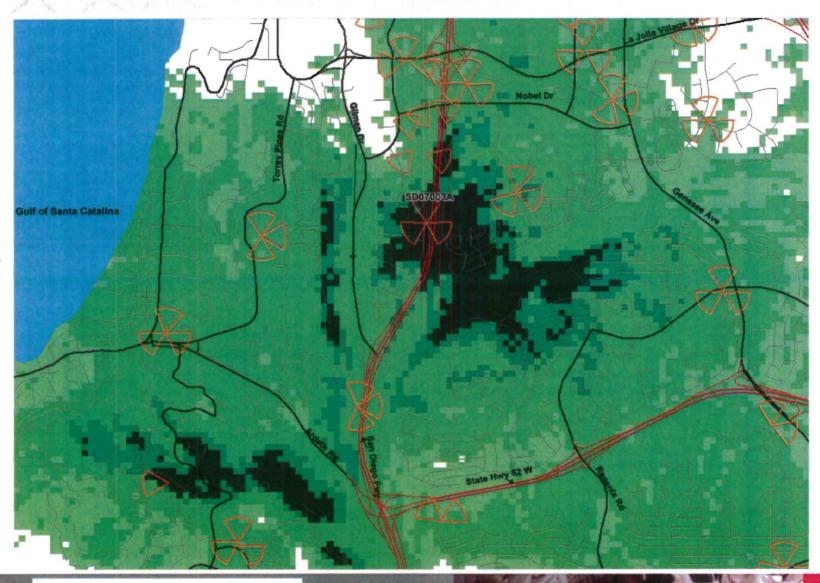


T-Mobile Justification Map - 50070034





SD07003A coverage (alone)



Legend: Coverage Level

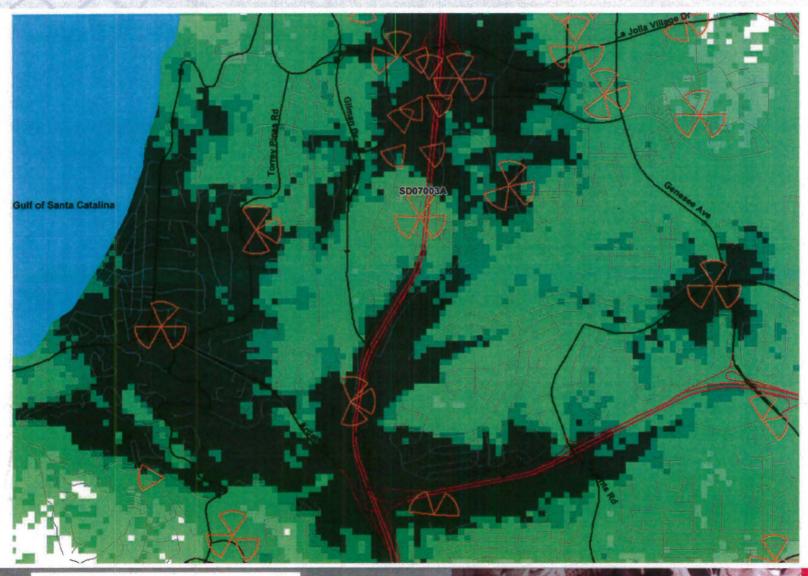
In Building

In Car

On Street



Existing On-Air sites coverage without SD07003A



Legend: Coverage Level

In Building

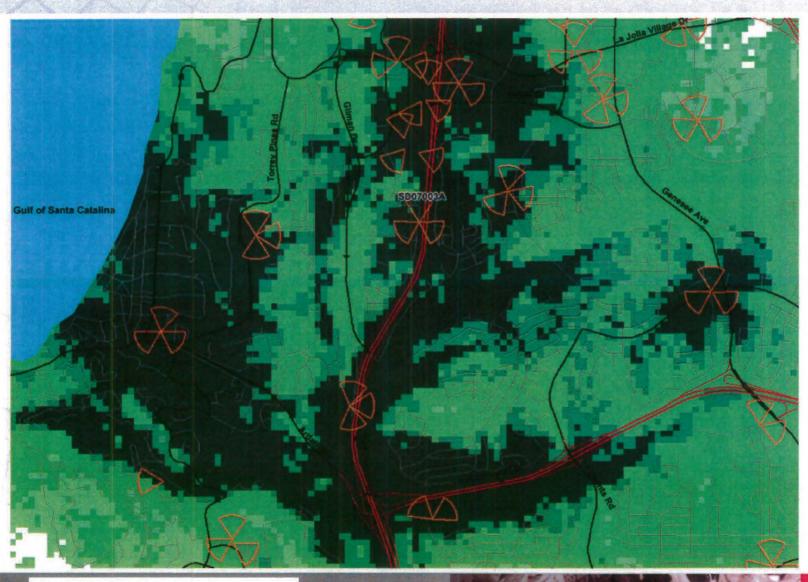
•

In Car

On Street

· T · · Mobile ·

Site with existing On-Air neighbor sites coverage



Legend: Coverage Level

In Building

In Ca

On Street

SAC Wireless Photo Survey

T-Mobile CUP Project SD07003A 8400 Via Sonoma San Diego, CA 92037

Index

Page	Subject
3	Ariel View of Site
4	View of Site From North
5	View of Site From East
6	View of Site From South
7	View of Site From West
8	View From Site to North
9	View From Site to East
10	View From Site to South
11	View From Site to West
12	Equipment Cabinets

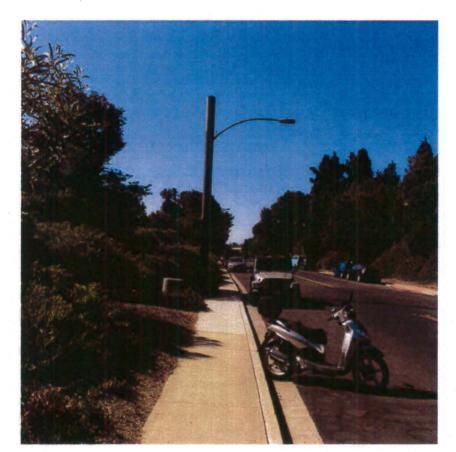
Cabinet Enclosure

Ariel View of Site

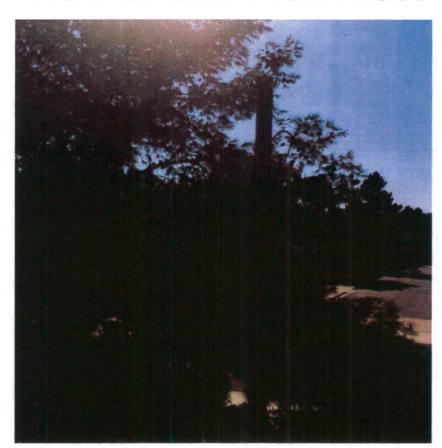
Antenna Sectors



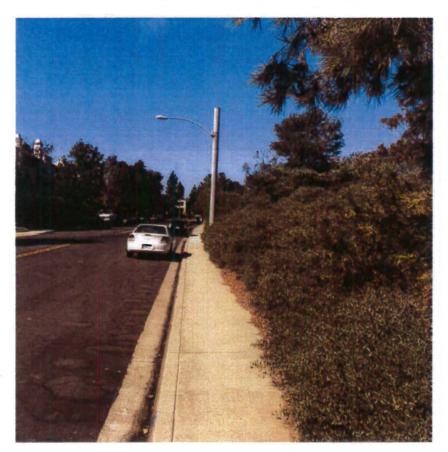
View of Site From North



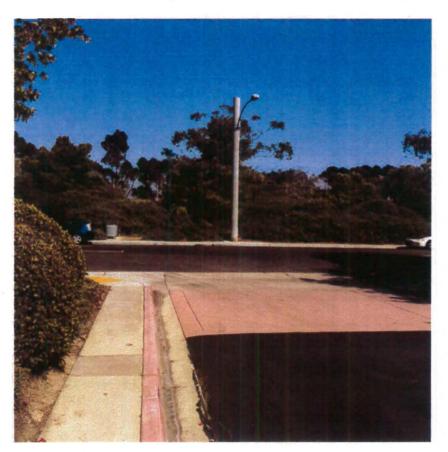
View of Site From East



View of Site From South



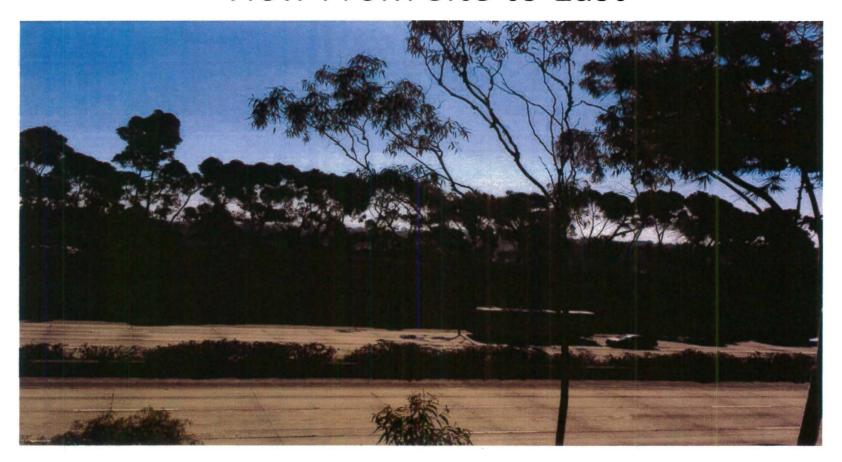
View of Site From West



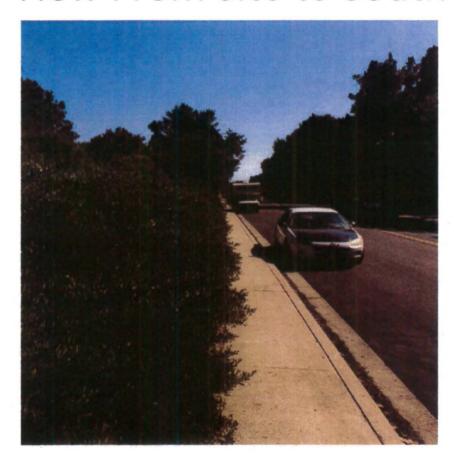
View From Site to North



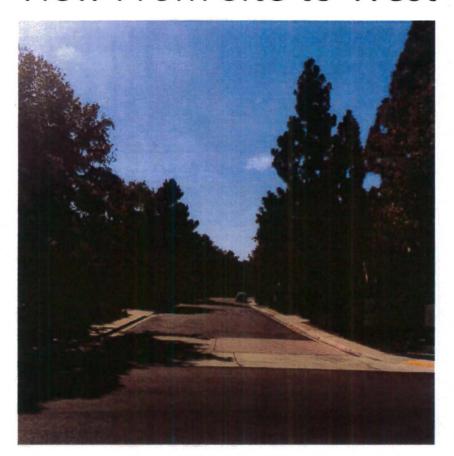
View From Site to East



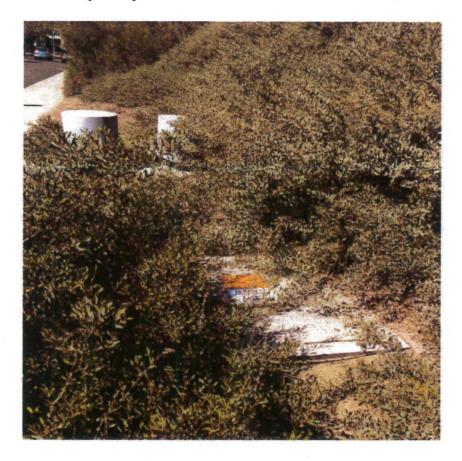
View From Site to South



View From Site to West



Equipment Cabinets



T--Mobile-

ATTACHMENT 13

DRAWING INDEX

DESCRIPTION

EXISTING ANTENNA PLAN, MOUNTING DETAIL & SCHEDULE

EXISTING & PROPOSED NORTHWEST ELEVATIONS

EXISTING EQUIPMENT PLAN. & EXISTING BATTERY CALCULATIONS

SHEET

T-10

T-2.0

A-1 0

A-2.0

A-3.0

A-4.0

TITLE SHEET

OVERALL SITE PLAN

ENLARGED SITE PLAN

LETTER OF AUTHORIZATION

T - Mobile-

5015 SHOREHAM PLACE, SUITE 150

REVISIONS 0 09/08/16 90% ZD's JE 01/23/17 100% ZD's JE A 02/24/17 CITY COMMENTS CA A 04/27/17 CITY COMMENTS NOT FOR CONSTRUCTION UNLESS LABELED AS CONSTRUCTION SET



VIA SONOMA ROW SD07003A 8400 VIA SONOMA SAN DIEGO CA 92037

SHEET TITLE

TITLE SHEET

SHEET NUMBER

T-1.0

SITE NUMBER: SD07003A

SITE NAME: ADDRESS:

VIA SONOMA ROW 8400 VIA SONOMA

SAN DIEGO, CA 92037

LOCATION MAP

COUNTY: SAN DIEGO

CUP, PROCESS 3 A PROJECT:

PROJECT INFORMATION

SITE NAME: SITE NUMBER: SITE ADDRESS: VIA SONOMA ROW SD07003A 8400 VIA SONOMA SAN DIEGO, CA 92037 CITY OF SAN DIEGO JURISDICTION: COUNTY:

LONGITUDE

117.23098°W

CONSTRUCTION TYPE: A.P.N. : ZONING CLASSIFICATION: PROPOSED USE

PUBLIC RIGHT-OF-WAY

TELECOMMUNICATION FACILITY CITY OF SAN DIEGO

ioseph.rose41@T-Mobile.com

PROPERTY OWNER

T-MOBILE PROJECT MANAGER: JOSEPH ROSE (858) 334-6112

APPLICANT:

SAC WIRELESS ON REHALF OF TAMORILE (858) 200-6541



SCOPE OF WORK

-NEW CONDITIONAL USE PERMIT APPLICATION TO CONTINUE THE USE OF AN EXISTING WIRELESS COMMUNICATION FACILITY WITHIN THE RIGHT-OF-WAY NO NEW BATTERIES ARE TO BE ADDED

PROJECT TEAM

ARCHITECT: SAC WIRELESS CONSTRUCTION MANAGER: T-MOBILE USA NESTOR POPOWYCH A LA KIRT BARCOCK 5015 SHOREHAM PLACE, STE 150 10509 VISTA SORRENTO PKWY SAN DIEGO, CA 92122 STE 206 CONTACT: DENNIS YOSHII PHONE: (619) 736-3766 X105 SAN DIEGO, CA 92121 EMAIL: dennis.voshii@sacw.com ENGINEER: SAC WIRELESS

PHONE: (858) 334-6139 EMAIL: kirt.babcock@T-Mobile.com RF ENGINEER: T-MOBILE USA MUSTAFA A IMAI 5015 SHOREHAM PLACE, STE 150 SAN DIEGO, CA 92122 10509 VISTA SORRENTO PKWY STE 206 PHONE: (619) 738-3766 ¥114 SAN DIEGO CA 92121

EMAIL: mustafa.aimal@T-Mobile.co PLANNING/ZONING CONSULTANT: SAC WIRELESS DAIL RICHARD 5015 SHOREHAM PLACE, STE 150 SAN DIEGO, CA 92122 PHONE: (858) 200-6541

TAHZAY RAMIREZ P.F.

DRIVING DIRECTIONS

DIRECTIONS FROM: 10509 VISTA SORRENTO PKWY, SAN DIEGO, CA 92121

- HEAD NORTHWEST ON VISTA SORRENTO PKWY TOWARD LUSK BLVD USE THE LEFT 2 LANES TO TURN LEFT ONTO SORRENTO VALLEY BLVD
- LISE THE MIDDLE LANE TO TURN RIGHT ONTO ROSELLE ST
- USE THE LEFT 2 LANES TO TURN LEFT TO MERGE ONTO I-5 S
- MERGE ONTO I-5 S
- TAKE EXIT 27 FOR GILMAN DRILA JOLLA COLONY DR
- TURN RIGHT ONTO GILMAN DR VIA ALICANTE TURNS SLIGHTLY RIGHT AND BECOMES VIA SONOMA



TOLL FREE: 1-800-227-2600 OR CALIFORNIA STATLITE DECLLIDES MIN OF 2 WORKING DAYS NOTICE BEFORE YOU EXCAVATE

Know what's below

IN CALIFORNIA (SOUTH), CALL DIG ALERT

TO ORTAIN LOCATION OF PARTICIPANTS

SITE NORTH

LEGAL DESCRIPTION

PUBLIC RIGHT-OF-WAY

3

GENERAL NOTES

THE FACILITY IS LINMANNED AND NOT FOR HUMAN HARITATION, A TECHNICIAN WILL VISIT THE SITE AS REQUIRED FOR ROUTINE MAINTENANCE. THE PROJECT WILL NOT RESULT IN ANY SIGNIFICANT DISTURBANCE OR EFFECT ON DRAINAGE; NO SANITARY SEWER SERVICE REQUIRED AND NO COMMERCIAL SIGNAGE IS PROPOSED.

DO NOT SCALE DRAWINGS

CONTRACTOR SHALL VERIFY ALL PLANS, EXISTING DIMENSIONS & FIELD CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ARCHITECT OR ENGINEER OF RECORD IN WRITING OF ANY DISCREPANCIES BEFORE PROCEEDING WITH THE WORK OR BE RESPONSIBLE FOR SAME.

SPECIAL NOTES

ALL WORK SHALL BE INSTALLED IN CONFORMANCE WITH CURRENT T-MOBILE CONSTRUCTION INSTALLATION GUIDE.

EXISTING CONDITIONS WILL BE VERIFIED IN FIELD. IF SIGNIFICANT DEVIATIONS OR DETERIORATION ARE ENCOUNTERED AT THE TIME OF CONSTRUCTION, A REPAIR CONTRACTOR SHALL NOTIFY ARCHITECT

OR ENGINEER OF RECORD IMMEDIATELY.
CONTRACTOR SHALL VERIFY ALL PLANS & EXISTING DIMENSIONS & CONDITIONS ON THE JOB SITE & SHALL IMMEDIATELY NOTIFY THE ARCHITECT OR ENGINEER OF RECORD IN WRITING OF ANY WITH THE WORK OR BE RESPONSIBLE FOR SAME.

THESE DRAWINGS ARE FULL SIZE & SCALEABLE ON 22"X34" SHEET SIZE & ARE NOT REDUCED IN SIZE.
STATEMENT THAT COMPLIANCE WITH THE ENERGY CODE IS NOT REQUIRED, -SCOPE OF WORK DOES NOT INVOLVE
MODIFICATIONS TO EXTERIOR ENVELOPE OF BUILDING HVAC SYSTEMS OR

ELECTRICAL LIGHTING.

APPROVALS

2013 CALIFORNIA ENERGY CODE

2013 CALIFORNIA BUILDING CODE

2013 CALIFORNIA ELECTRICAL CODE 2013 CALIFORNIA FIRE CODE

2013 CALIFORNIA MECHANICAL CODE

2013 CALIFORNIA PLUMBING CODE

THE FOLLOWING PARTIES HEREBY APPROVE AND ACCEPT THESE DOCUMENTS & AUTHORIZE THE SUBCONTRACTOR TO PROCEED WITH THE CONSTRUCTION DESCRIBED HEREIN. ALL DOCUMENTS ARE SUBJECT TO REVIEW BY THE LOCAL BUILDING DEPARTMENT & MAY IMPOSE CHANGES OR MODIFICATIONS.

CODE COMPLIANCE

T-MOBILE PROJECT MANAGER:	DATE:
T-MOBILE CONSTRUCTION MANAGER:	DATE:
T-MOBILE RF ENGINEER:	DATE:
SITE ACQUISITION:	DATE:
PROPERTY OWNER:	DATE:
ZONING:	DATE:

City Consent Application

1/10	V17			
- (Date)			
Ms. I	Enza Charles			
Real	Estate Assets Department			
The (City of San Diego			
1200	Third Avenue, Suite 1700			
San I	Diego, California 92101			
RE:	Site Address: 8400 Via Stones	sa, San Diega, CA 10017		
San I	Diego (the "Property")			
	Site Name: 1-Mosa sportosa	(rile Sonore ROW)		
	Agreement: Lease Agreen	nent, dated Occur 25.2007	(the "Lease") between The City	of
	San Diego ("City") and I	Mobile West LLC	, ("Lessee").	
Dear	Ms. Charles.			
woul	ert of the continuous effort id like to perform the fello s, to the site referenced about	wing modifications (changes) as described in the at	tach
Exempl	ke .			
	() in-the "A", beliapere peur (g) sty flust accesses, (g) resisting) have just instruction baseled on the f justs shi flust in brough to edight, flust.	from the people bank in the service of the	referies busted on the of the applement plants; because make in assummability for hoper attacking, the stress is	
Equipm foot sail	ent: Remove existing Propose Generator. I CMU block well Said Onlts to be screen	install one putCM Diesel Gerenaar i ed by a four (4) foot tell CREU black	or a 13" 111"4" erroz Sizid armo to be enclosed weth a unpil	den (is
Contain Contain valuat	ued use and operation of an existing ting of [3] existing panel entennes, co	wireless telecommunications incealed in a radonie, mounte	facility: of 10 a street light, with an underground equ	pme
		Real	Estate	
		1		
	50	Asse	ts	
		11000		

T-mobile the items described	would like to request City's consent and approval to complante.
Sincerely, Dail R	ichard agent for T-Mobile
Applicant's Signatu	re: Dail Richard
City Transportation	& Stormwater department has provided it's consent and approval to
allow T-Mobile	to perform the proposed modifications described herei
dealer	1.th P=
Date	Signature
CITY OF SAN DIEGO,	ACKNOWLEDGEMENT AND CONSENT
FOR MODIFICATION	
FOR MODIFICATION	oma, San Diego, CA 92037
FOR MODIFICATION	OF
8400 Via Sono	oma, San Diego, CA 92037
8400 Via Sono	oma, San Diego, CA 92037 (Ste Location)
FOR MODIFICATION	oma, San Diego, CA 92037 (Ste Location)
By: Cybele L	ore orma, San Diego, CA 92037 (Site Secation) Thompson
By: Cybele L	oma, San Diego, CA 92037 (Ste Location)
By: Cybele L	ore orma, San Diego, CA 92037 (Site Secation) Thompson
By: Cybele L Director of	or ma, San Diego, CA 92037 (Stin Location) Thompson of Real Estate Assets
By: Cybele L Director of	orma, San Diego, CA 92037 (Sile Jacation) Thompson of Real Estate Assets
By: Cybele L Director of	or ma, San Diego, CA 92037 (Stin Location) Thompson of Real Estate Assets





REVISIONS				
REV.	DATE	DESCRIPTION	IMTIALE	
0	09/08/16	90% ZD's	JE	
1	01/23/17	100% ZD's	JE	
A	02/24/17	CITY COMMENTS	CA	
A	04/27/17	CITY COMMENTS	JL	



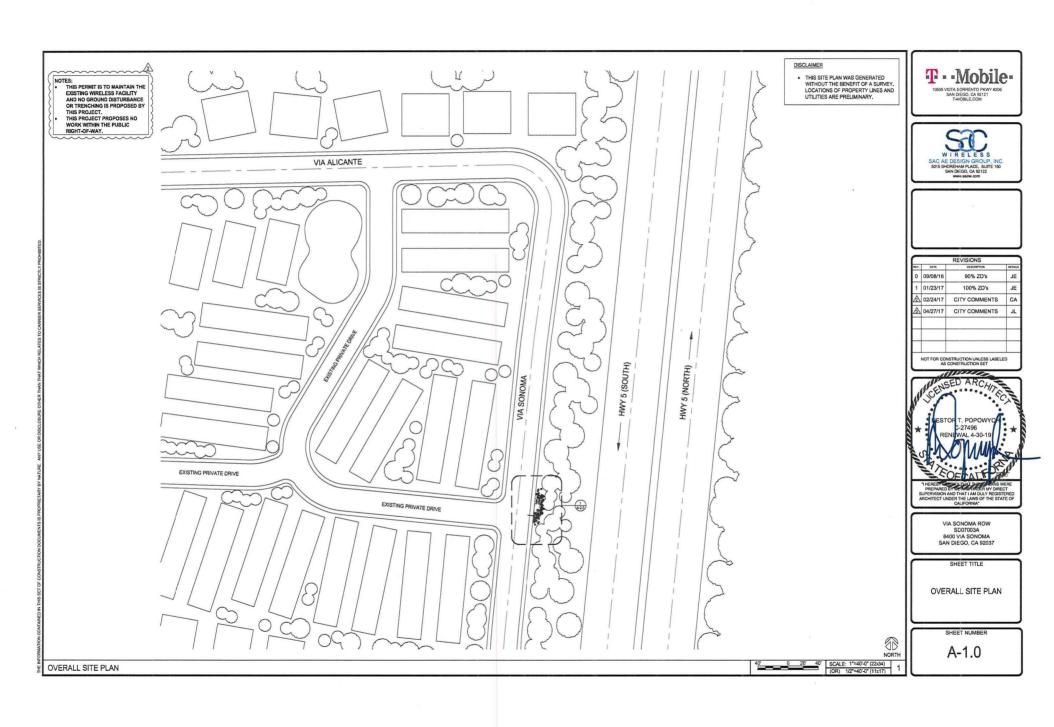
VIA SONOMA ROW SD07003A 8400 VIA SONOMA SAN DIEGO, CA 92037

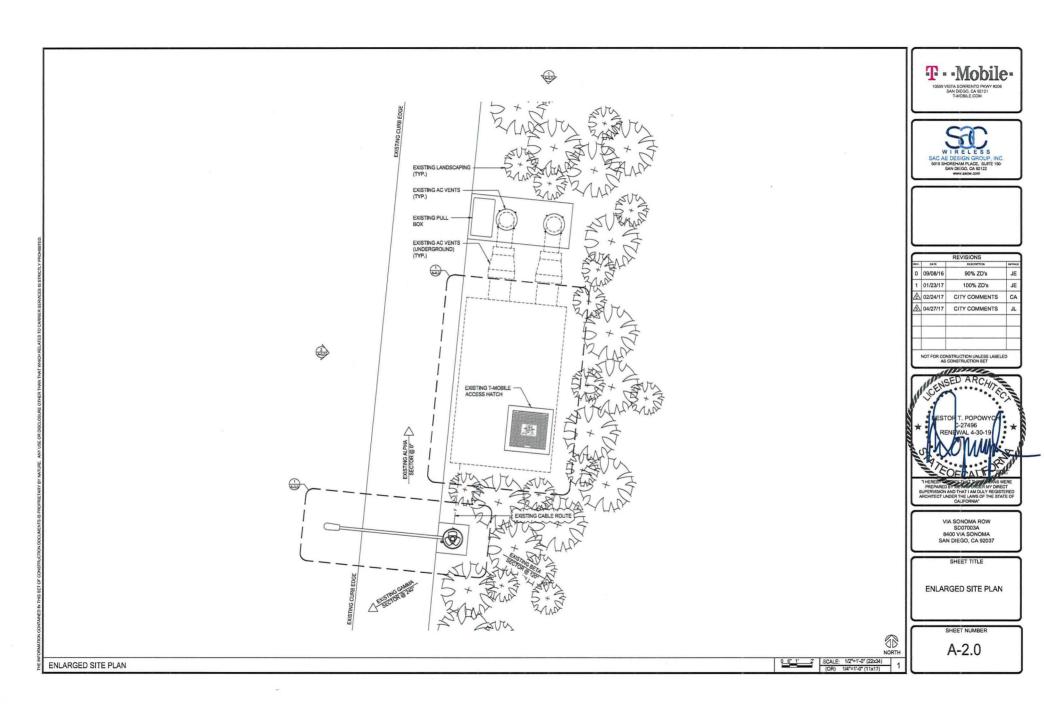
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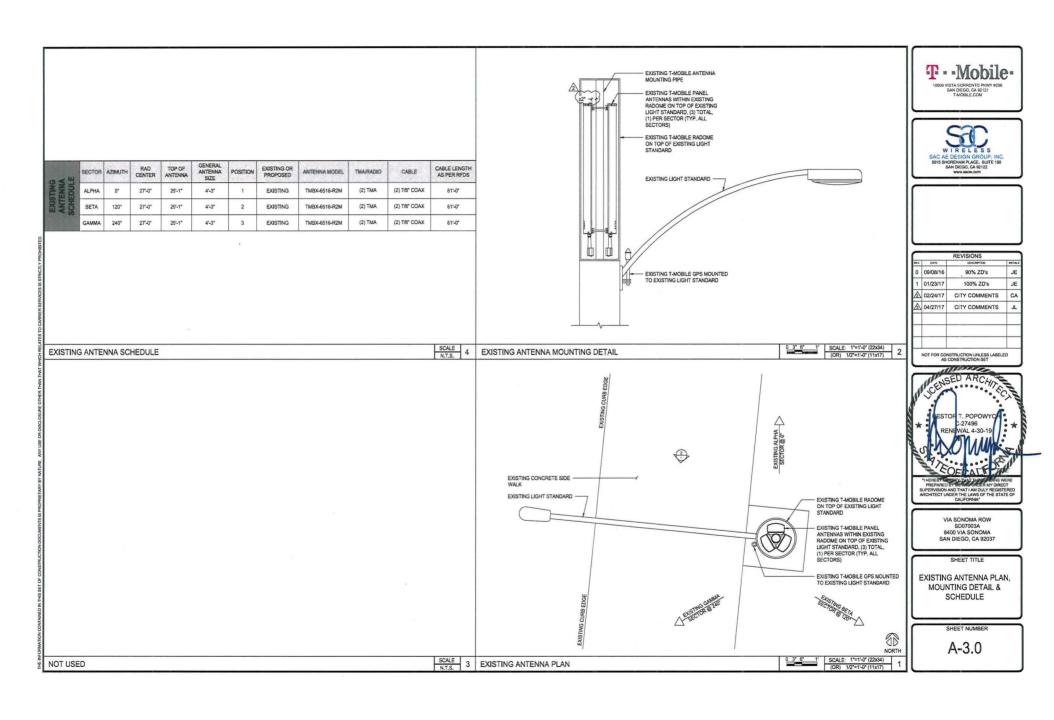
LETTER OF AUTHORIZATION

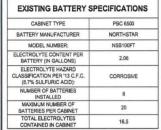
SHEET NUMBER

T-2.0









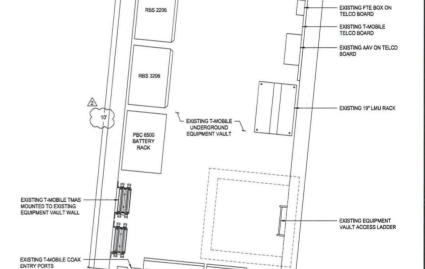
EXISTING T-MOBILE — PBC 6500 BATTERY CABINET

(8) EXISTING BATTERIES: NSB100FT TO REMAIN AS IS



EXISTING BATTERY CALCULATIONS

SCALE N.T.S. 3



- 5-8" -





REVISIONS				
0	09/08/16	90% ZD's	JE	
1	01/23/17	100% ZD's	JE	
2	02/24/17	CITY COMMENTS	CA	
Δ	04/27/17	CITY COMMENTS	JL	
_			+	
		(4)	+	



VIA SONOMA ROW SD07003A 8400 VIA SONOMA SAN DIEGO, CA 92037

SHEET TITLE

EXISTING EQUIPMENT PLAN, & EXISTING BATTERY CALCULATIONS

SHEET NUMBER

A-4.0

0 3° 6° 1′ SCALE: 1°=1°-0′ (22x34) (OR) 1/2°=1°-0′ (11x17) 1

EXISTING T-MOBILE AC PANEL

SCALE 2 EXISTING EQUIPMENT PLAN

EXISTING T-MOBILE AIR MONITOR PANEL BOX

NOT USED

