

August 5, 2021

Justin Causey  
MD7  
Agent Representing AT&T  
10590 West Ocean Air Drive STE 300  
San Diego, CA 92130

*Sent via e-mail only*

E-mail: [jcausey@md7.com](mailto:jcausey@md7.com)

Dear Justin:

Subject: AT&T Cardeno Review Letter  
Project No. 684820  
Located at: 1570 Alta La Jolla Drive, San Diego, CA 92037

Development Services has completed a review of the most recent submittal of your project. Enclosed, a "Cycle Issues Report" provides review issues from staff. Please submit the materials listed in the attached "Submittal Requirements Report" as soon as possible to facilitate efficient processing of your project.

Prior to resubmitting your project, refer to Information Bulletin 536 which outlines Wireless Communication Facility (WCF) project submittal requirements and provides answers to frequently asked questions. Links to this bulletin, the WCF Regulations, and more information are available on the WCF web page: <https://www.sandiego.gov/development-services/codes-regulations/wireless-communication-facilities>.

If additional requirements arise during subsequent project reviews, we will identify the issues and the reason for the requirements. If the outstanding review issues are not resolved or required information is not submitted, we will continue processing the project; however please be advised that the project may be denied if the issues are not satisfactorily addressed or if the findings for approval cannot be made in the affirmative.

San Diego Municipal Code (SDMC) Section 126.0114 requires that permit applications be closed if the applicant fails to submit the requested information, fees, or deposits within 90 calendar days. Once closed, the application, plans, and other data submitted may be destroyed. To reapply the applicant may submit a new application, with all required submittal materials and fees. To avoid the closure of your application, you must resubmit your project with the materials and revisions requested **within 30 days of the date of this letter**. This deadline can be extended by

communication with your project manager; however, your project may be closed if 30 days pass without additional information.

**RESUBMITTALS/NEXT STEPS: COVID-19 Update** - To ensure the health, safety and well-being of customers and department staff, the Development Services Department has implemented operational service changes that will be in effect until further notice. Please visit our webpage for latest updates, <https://www.sandiego.gov/development-services/covid-19-public-notice>.

At this time, additional documents and information are required to continue the review process. Please visit [OpenDSD](#) to check both the Project Tracking System (PTS) Completed Reviewer Issues Report and the Submittal Requirements Report for next time documents identified by each review discipline or review the resubmittal attachment at the end of this letter. All required documents requested by all disciplines must be uploaded individually and at the same time. Please be on the watch for an email from either DSD or Accela providing digital submittal instructions. Incomplete submittals will result in additional review cycle. In addition, please be prepared to provide the following:

Applicant Response to Issues: Prepare a cover letter that specifically describes how you have addressed each of the issues identified in the Cycle Issues Report and any issues identified in this cover letter, if applicable. Or, you may choose to simply submit the Cycle Issues Report, identifying within the margins how you have addressed the issue. If the issue is addressed on one or more sheets of the plans or the reports, please reference the plan, sheet number, report or page number as appropriate. If it is not feasible to address a particular issue, please indicate the reason.

**Failure to Concurrently Process:** Per Information Bulletin 536, this project was required to be concurrently processed with all related construction permits in order to comply with federal shot clock rules. Because this concurrent submittal was not made, it will not be possible for the City to process within the shot clock timeframe. You must toll this application or the City will need to recommend denial at hearing. A tolling agreement is being provided to you with this assessment letter. Please return it with your next review cycle as part of your "Applicant Correspondence" package. Tolloed projects will continue to be processed as quickly as possible.

**Community Planning Group:** The proposed project is located within the La Community Planning Area. The La Jolla Community Planning Group is the officially recognized community group for the area to provide recommendations to the City.

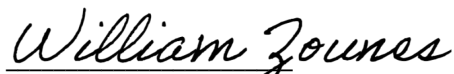
After submitting the next review cycle, you must contact Dianne Kane, Chairperson of the La Jolla Community Planning Group at (858) 459-9490 or by email at [info@lajollacpa.com](mailto:info@lajollacpa.com) to schedule your project for a presentation before the group at their next available meeting. Please do not contact the CPG before submitting - we cannot send plans until you submit them to us.

Please get onto the Community Planning Group agenda as soon as possible. If this does not happen in a timely manner, shot clock timelines may require your project to progress to hearing/decision without a recommendation. This is not advised. If you encounter any delays in getting onto the next available agenda, please coordinate with me for your next steps.

Development Services Department (DSD) Information Bulletin #620, "Coordination of Project Management with Community Planning Committees" (available at <https://www.sandiego.gov/development-services>), provides additional information about the advisory role the Community Planning Groups. Council Policy 600-24 provides guidance to the Community Planning Groups and is available at [https://docs.sandiego.gov/councilpolicies/cpd\\_600-24.pdf](https://docs.sandiego.gov/councilpolicies/cpd_600-24.pdf)

Please contact me if you have any questions regarding this letter, the information and revisions requested in the enclosed Cycle Issues Report, the plans and documentation listed in the Submittal Requirements Report, and/or any modifications to the project scope. I may be reached by phone at (619) 687-5942 or via e-mail at [wzounes@sandiego.gov](mailto:wzounes@sandiego.gov).

Sincerely,



Project Manager Name  
Development Project Manager

Enclosures:

1. Cycle Issues Report
2. Submittal Requirements Report
3. Required Findings
4. Tolling Agreement

cc: File



L64A-003A

## Project Information

**Project Nbr:** 684820      **Title:** Digi: AT&T Cardeno  
**Project Mgr:** \*System Managed, Project      (619) 446-5000      DSDProjectInfo@sandiego.gr



## Review Information

<b>Cycle Type:</b> 10 Completeness Review-Telecom	<b>Submitted:</b> 07/20/2021	Deemed Complete on 07/20/2021
<b>Reviewing Discipline:</b> LDR-Environmental	<b>Cycle Distributed:</b> 07/20/2021	
<b>Reviewer:</b> Szymanski, Jeffrey (619) 446-5324 Jszymski@sandiego.gov	<b>Assigned:</b> 07/21/2021	
	<b>Started:</b> 08/04/2021	
<b>Hours of Review:</b> 1.00	<b>Review Due:</b> 08/04/2021	
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Completed:</b> 08/04/2021	<b>COMPLETED ON TIME</b>
	<b>Closed:</b> 08/05/2021	

- . The review due date was changed to 08/04/2021 from 08/17/2021 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . We request a 2nd complete submittal for LDR-Environmental on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 2 outstanding review issues with LDR-Environmental (all of which are new).
- . The reviewer has not signed off 1 job.
- . Last month LDR-Environmental performed 65 reviews, 72.3% were on-time, and 28.8% were on projects at less than < 3 complete submittals.

### EAS Review 8/4/2021

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
-----------------	------------------	-------------------

- |                          |   |   |
|--------------------------|---|---|
| <input type="checkbox"/> | 1 | The Environmental Analysis Section (EAS) has reviewed the referenced project and has determined that additional information is required for GHG. Until all issues have been addressed, the CEQA determination can not be made and the environmental processing time line will be held in abeyance and the project will be placed in Extended Initial Study. (New Issue) |
|--------------------------|---|---|

### CAP Checklist

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
-----------------	------------------	-------------------

- |                          |   |  |
|--------------------------|---|--|
| <input type="checkbox"/> | 2 | Please revise the response to Step 1, the box has been marked as a "no" which would indicate that the projet is not consistent with existing Land Use. In addition, please provide a written response in the text boxes. |
|--------------------------|---|--|

Also, under step 2, WCFs are not subject to step 2. Please mark these boxes as N/A. (New Issue)





# Cycle Issues

THE CITY OF SAN DIEGO  
Development Services Department  
1222 1st Avenue, San Diego, CA 92101-4154

L64A-003A

## Review Information

<b>Cycle Type:</b> 10 Completeness Review-Telecom	<b>Submitted:</b> 07/20/2021	Deemed Complete on 07/20/2021
<b>Reviewing Discipline:</b> LDR-Landscaping	<b>Cycle Distributed:</b> 07/20/2021	
<b>Reviewer:</b> Chorak, Jill	<b>Assigned:</b> 07/26/2021	
(619) 446-5183	<b>Started:</b> 08/03/2021	
JChorak@sandiego.gov	<b>Review Due:</b> 08/03/2021	
<b>Hours of Review:</b> 1.00	<b>Completed:</b> 08/03/2021	<b>COMPLETED ON TIME</b>
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Closed:</b> 08/05/2021	

- . The review due date was changed to 08/04/2021 from 08/17/2021 per agreement with customer.
- . We request a 2nd complete submittal for LDR-Landscaping on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Last month LDR-Landscaping performed 37 reviews, 51.4% were on-time, and 44.8% were on projects at less than < 3 complete submittals.

### 📁 1st Review 08/03/2021

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	Project Scope: Process 3 CUP for a wireless communication facility consisting of (9) panel antennas and associated components concealed within the roof top cupola of a clubhouse building located in La Jolla. (New Issue)
<input checked="" type="checkbox"/>	2	Applicability (Information Only): Per SDMC 141.0420, the applicant shall use all reasonable means to conceal or minimize the visual impacts of the WCF through the use of architecture, landscape, and siting solutions. Landscape material and design techniques should be utilized to integrate WCFs with the surrounding environment to improve views from neighboring properties and the public right-of-way. (New Issue)
<input checked="" type="checkbox"/>	3	Information Only: The less visible a facility is, the more integrated/concealed it is. Increasing visibility reduces/defeats concealment. Anything that is represented on plans and photo simulations as providing concealment (adjacent landscaping, paint colors, architectural elements, etc.) should be present for the life of the project, and so must be in an area within the applicant's control. (New Issue)
<input checked="" type="checkbox"/>	4	Information Only: Existing and proposed landscape material and design techniques should be utilized to integrate WCFs with the surrounding environment to improve views from neighboring properties and the public right-of-way. (New Issue)
<input checked="" type="checkbox"/>	5	The modifications to this cell site are not adding mass and bulk to the building and do not affect existing landscape surrounding the property. Project conforms to SDMC 141.0420. Landscape has no issues. (New Issue)





L64A-003A

**Review Information**

<b>Cycle Type:</b> 10 Completeness Review-Telecom	<b>Submitted:</b> 07/20/2021	Deemed Complete on 07/20/2021
<b>Reviewing Discipline:</b> LDR-Engineering Review	<b>Cycle Distributed:</b> 07/20/2021	
<b>Reviewer:</b> Huynh, Khanh (619) 446-5299 KHuynh@sandiego.gov	<b>Assigned:</b> 07/26/2021	
	<b>Started:</b> 08/03/2021	
<b>Hours of Review:</b> 2.00	<b>Review Due:</b> 08/03/2021	
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Completed:</b> 08/03/2021	<b>COMPLETED ON TIME</b>
	<b>Closed:</b> 08/05/2021	

- . The review due date was changed to 08/04/2021 from 08/17/2021 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . We request a 2nd complete submittal for LDR-Engineering Review on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 5 outstanding review issues with LDR-Engineering Review (all of which are new).
- . Last month LDR-Engineering Review performed 59 reviews, 91.5% were on-time, and 29.2% were on projects at less than < 3 complete submittals.

**1st Review**

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	1	These comments are draft and subject to change until presented by the City's assigned Development Project Manager in conjunction with the project Assessment Letter. Staff is unable to process formal, intermediate plan changes and updates outside the full submitted cycle. A formal response to these comments must be made through the resubmittal process in response to the full Assessment Letter. Your DSD Development Project Manager can assist with further questions. (New Issue)
<input type="checkbox"/>	2	With your next submittal, please provide a complete response to each of the issues listed in this report. The written response shall clearly, concisely and comprehensively address the issues raised and please specify on what page/sheet each issue was addressed. (New Issue)
<input type="checkbox"/>	3	Revise the Site Plan. Add a note that states: This project proposes no work within the Public Right-of-Way.  (New Issue)
<input type="checkbox"/>	4	Revise the Site Plan. Add a note that states: "NO GROUND DISTURBANCE OR TRENCHING IS PROPOSED BY THIS PROJECT" (New Issue)
<input type="checkbox"/>	5	Development Permit Conditions will be determined on the next submittal when all requested information is provided. (New Issue)





L64A-003A

**Review Information**

<b>Cycle Type:</b> 10 Completeness Review-Telecom	<b>Submitted:</b> 07/20/2021	Deemed Complete on 07/20/2021
<b>Reviewing Discipline:</b> Telecom (WCF) Review	<b>Cycle Distributed:</b> 07/20/2021	
<b>Reviewer:</b> Zounes, Will (619) 687-5942 wzounes@sandiego.gov	<b>Assigned:</b> 07/20/2021	
	<b>Started:</b> 08/03/2021	
<b>Hours of Review:</b> 3.00	<b>Review Due:</b> 08/03/2021	
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Completed:</b> 08/04/2021	<b>COMPLETED LATE</b>
	<b>Closed:</b> 08/05/2021	

- . The review due date was changed to 08/04/2021 from 08/17/2021 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Partial Response to Cmnts/Regs.
- . We request a 2nd complete submittal for Telecom (WCF) Review on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Your project still has 10 outstanding review issues with Telecom (WCF) Review (all of which are new).
- . The reviewer has not signed off 1 job.
- . Last month Telecom (WCF) Review performed 101 reviews, 55.4% were on-time, and 76.2% were on projects at less than < 3 complete submittals.

**2021-08-04 Review**

**Project Info**

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	1	The project proposes a Conditional Use Permit for the operation of a Wireless Communication Facility (WCF) to include nine (9) panel antennas and 12 Remote Radio Units (RRUs) mounted behind an existing Fiberglass Reinforced Plastic (FRP) rooftop mechanical screen architecturally integrated with the existing structure. Additionally, the project includes modifications to ancillary equipment including a new baseboard and a power converter for support to the WCF (Information only, no response required) (New Issue)
<input type="checkbox"/>	2	The project is located at 1570 Alta La Jolla Drive, San Diego, CA 92037 in the RS-1-4 zone, within the Coastal Height Limitation Overlay Zone in the La Jolla Community Plan, and City Council District 1. Other overlay zones may apply to the property but they are not relevant to Wireless Communication Facilities. (Information only, no response required) (New Issue)
<input type="checkbox"/>	3	Pursuant to SDMC 141.0420(c)(A)(i), this project application is being processed as a Conditional Use Permit because of its location within a residential zone on a premises that does not contain residential development. (Information only, no response required) (New Issue)

**Project Comments/Issues**

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	4	In addition to the plan check comments described herein, the following application items were not provided as a part of this submittal or were deficient, as described below. Please see Information Bulletin 536 online at <a href="https://www.sandiego.gov/sites/default/files/dsdib536.pdf">https://www.sandiego.gov/sites/default/files/dsdib536.pdf</a> for more information. (New Issue)
<input type="checkbox"/>	5	Per IB 536, this application was to be made concurrently with its associated construction permits in order to comply with Federal shot clocks. "If concurrent submittal is not made, the City cannot meet shot clock requirements, and the shot clock must be tolled. Submitting a zoning approval without concurrently processing a construction permit constitutes acceptance of this fact." You will be sent a tolling agreement along with your assessment letter. Please complete it and return with your next submittal. (New Issue)
<input type="checkbox"/>	6	Color Photo Simulations: Provide pointers on the photo simulations identifying where the FRP screen is located. It appears no exterior changes are proposed for the screen wall, therefore please provide a statement on the project plans identifying that, "there are no exterior changes proposed." The photo simulations will be included as part of the project approval (Exhibit "A") and be used during the review, approval, construction and inspection phases of the project. (New Issue)
<input type="checkbox"/>	7	Findings: The Findings of Fact are required to be justified for the proposed project. Please provide written justification to each of the findings with the next submittal. The required findings are located in Enclosure 3. (New Issue)
<input type="checkbox"/>	8	If you have not already done so, please contact Dianne Kane Chairperson of the La Jolla Community Planning Group by email at <a href="mailto:info@lajollacpa.org">info@lajollacpa.org</a> or by phone at *858) 459-9490 to schedule your project for a presentation before the group at their next available meeting. If you have already obtained a recommendation from the group, please email a copy of the recommendation and/or minutes from the meeting which includes the vote count to the City's Project Manager, William Zounes (New Issue)
<input type="checkbox"/>	9	To be considered satisfactory, responses to comments herein must show how the question will be answered by the project. A restatement of the requirements saying the project will meet them is not sufficient. (Information only, no response required) (New Issue)
<input type="checkbox"/>	10	A written response to comments is REQUIRED for submittal of the next cycle. State the location(s) on the plans where the comment was addressed, if applicable. (New Issue)

For questions regarding the 'Telecom (WCF) Review' review, please call Will Zounes at (619) 687-5942. Project Nbr: 684820 / Cycle: 10





# Submittal Requirements

8/5/21 11:38 am

THE CITY OF SAN DIEGO  
Development Services Department  
1222 1st Avenue, San Diego, CA 92101-4154

**ENCLOSURE 2** Page 1 of 1

L64A-001

## Project Information

**Project Nbr:** 684820      **Title:** Digi: AT&T Cardeno  
**Project Mgr:** \*System Managed, Project      (619)446-5000      DSDProjectInfo@sandiego.gr



## Review Cycle Information

**Review Cycle:** 11 Submitted (Multi-Discipline)

**Opened:** 07/20/2021 2:29 pm

**Submitted:**

**Due:**

**Closed:**

## Required Documents:

<u>Package Type</u>	<u>Pkg Qty</u>	<u>Document Type</u>	<u>Qty Needed</u>
Dev. Plans reduced 11x17	2	Dev. Plans reduced 11x17	2
Photo Simulations	1	Photo Simulations	1
Applicant Correspondence	1	Applicant Correspondence	1
Climate Action Plan Consistency Checklist	1	Climate Action Plan Consistency Checklist	1
Noticing	1	Public Notice Package	1
Building Construction Plans	1	Building Construction Plans	1





**Required Findings for AT&T Cardeno  
Project No. 684820**

**Conditional Use Permit SDMC Section 126.0305:**

1. The proposed development will not adversely affect the applicable land use plan.
2. The proposed development will not be detrimental to the public health, safety, and welfare.
3. The proposed development will comply with the regulations of the Land Development Code including any allowable deviations pursuant to the Land Development Code.
4. The proposed use is appropriate at the proposed location.

## Tolling Agreement

Date of Agreement: August 5, 2021

As you know, the City must comply with Federal "Shot Clocks" which require that the City process applications within designated time periods. These shot clocks may be tolled by mutual consent.

This is an agreement between MD7, agents representing AT&T, and the City of San Diego to extend the appropriate "Shot Clock" deadline. This agreement covers the following development project application:

Project Name: **AT&T Cardeno**  
 City Project Number: **684820**  
 City Project Manager: **William Zounes**  
 Project Address: **1570 Alta La Jolla Drive, San Diego, CA 92037**

Applicable Shot Clock (To be completed by staff)		
Check Box	Project Type	Shot Clock
	Spectrum Act Projects <sup>1</sup>	60 Days
	SWF (Small Wireless Facility) on an existing structure <sup>2</sup>	60 Days
	SWF on a new structure <sup>2</sup>	90 Days
X	Non-SWF on an existing structure <sup>3</sup>	90 Days
	Non-SWF on a new structure <sup>3</sup>	150 Days
<sup>1</sup> Per <a href="#">FCC Report and Order 14-153</a>		
<sup>2</sup> Per <a href="#">FCC Report and Order 18-133</a>		
<sup>3</sup> Per <a href="#">FCC's 2009 Declaratory Ruling</a>		

Accordingly, upon your consent, the City of San Diego is willing to extend the time for processing the above-referenced project, which will remove the shot clock time limit selected above. If the proposed project requires multiple permits, this tolling agreement applies to all related approvals.

**This agreement does not toll to a time certain;** however, San Diego Municipal Code (SDMC) Section 126.0114 requires that permit applications be closed if the applicant fails to submit the requested information, fees, or deposits within 90 calendar days. Once closed, the application, plans, and other data submitted may be destroyed. To reapply the applicant may submit a new application, with all required submittal materials and fees. **To avoid the closure of your**

**application, you must resubmit your project with the materials and revisions requested by November 5, 2021**

If you consent to the above-described extension of the processing deadline, please date and sign in the space provided on page 2 and return this letter via email to [wzounes@sandiego.gov](mailto:wzounes@sandiego.gov).

If the City does receive this agreement in a timely manner, the "Shot Clock" will not apply; however, the application will continue to be processed diligently.

Agreed to by:

**CITY OF SAN DIEGO**

\_\_\_\_\_  
William Zounes  
Development Project Manager  
Development Services Department

\_\_\_\_\_  
Date

I hereby voluntarily agree and consent to the extension of the processing deadline described in this letter of agreement.

**AGENT REPRESENTING CARRIER**

\_\_\_\_\_  
Applicant Name

\_\_\_\_\_  
Applicant Signature

\_\_\_\_\_  
Company  
Agents representing AT&T

\_\_\_\_\_  
Date

DPM – Record on PTS