



ZONING ADMINISTRATOR STAFF REPORT

TO: Tracey Ferguson, Zoning Administrator

FROM: Tim Evans, Senior Planner – Extra Help *(Signature)*

MEETING DATE: December 10, 2025

SUBJECT: Public Hearings
Variance V 8-25/26-02
Special Use Permit U 3-24/25-07

PROJECT LOCATION: 881 First Avenue, Chester, unincorporated Plumas County;
APN 100-270-006-000; T28N/R7E/Sec. 8, MDM.

PLANNING AREA: N/A

GENERAL PLAN LAND USE: Rural Residential; Agriculture and Grazing; Lake

PRIMARY ZONING: Rural ("R-10"); General Agriculture ("GA"); Lake ("L")

COMBINING ZONE: Mobile Home ("MH"); Special Plan Scenic Area ("SP-ScA")

PARCEL SIZE: 77.58 acres

SEWAGE: Chester Public Utility District

WATER: Chester Public Utility District

ELECTRICITY: Pacific Gas and Electric Company

FIRE PROTECTION: Peninsula Fire Protection District

SUPERVISORIAL DISTRICT: District 3 – Supervisor Tom McGowan

APPLICANTS: TowerCo LLC and Verizon Wireless

OWNER: Chester Public Utility District

PROJECT DESCRIPTION:

On March 6, 2025, Complete Wireless Consulting, Inc., on behalf of TowerCo LLC and Verizon Wireless, applicants, submitted a special use permit application to allow the construction of a 129-foot monopole and supporting equipment within a 2,475-square-foot lease area on a 77.58-acre parcel zoned Rural ("R-10"), General Agriculture ("GA"), Lake ("L"), Mobile Home ("MH"), and Special Plan Scenic Area ("SP-ScA") located at 881 First Avenue, Chester, CA, APN 100-270-006-000.

On August 25, 2025, as a result of the initial special use permit submittal being determined incomplete, Planning staff received a revised special use permit application and project information as well as a completed variance application to allow the height increase of the monopole from 35 feet – as required for the “R-10” zoning district (Plumas County Code Sec. 9-2.4108(b)) – to 129 feet.

On November 6, 2025, public hearings were held for Variance V 8-25/26-02 and Special Use Permit U 3-24/25-07. Planning staff presented to Tracey Ferguson, Zoning Administrator, that the applicant provided information detailing that the “GA” zoned portion of the property is not a viable location for the telecommunications facility due to wetlands encompassing the “GA” zoning district. Planning staff further indicated that the “GA” zoning district would allow the telecommunications facility, including 129-foot monopole, without a variance and in order for staff to be supportive of a recommendation of approval for the variance to allow the height increase in the “R-10” zoning district, evidence is required to demonstrate a special circumstance and/or hardship specific to the viability of locating the telecommunications facility within the portion of the property zoned “GA.” Planning staff explained that, based on a map created by Plumas County Geographic Information Systems (GIS), there is a 0.94-acre portion of the parcel that is outside the wetlands, but still within the “GA” zoning district, which could potentially support the telecommunications facility without the need for a variance.

Planning staff stated information is required from the applicant, Army Corp of Engineers, or other jurisdiction showing that there is a buffer or setback from the wetlands that would prevent building the monopole on that portion of land and without that information, staff cannot make the recommendation to approve the variance. Planning staff concluded with a recommendation to the Zoning Administrator to hold the public hearing to receive any testimony and continue the hearing to a date and time certain to allow the County sufficient time to consult with the Army Corp of Engineers.

Upon receiving staff’s and the applicant’s presentations, the Zoning Administrator opened the public hearing and took the following actions:

1. The term “least intrusive means” is in the Telecommunications Ordinance, and evidence as to the least intrusive means is required to eliminate the viability of the portion of land zoned GA and find the least intrusive means is within the R-10 zoning where the site is proposed. Therefore, the Zoning Administrator requested the applicant address one of the following:
 - a. As Planning staff provided evidence that all of the “GA” zoning district is not encompassed by wetlands and noted an inaccuracy in the Wetland and Zoning Assessment prepared by Trileaf Corporation concerning the wetlands in relation to the “GA” zoning district, an additional letter from Trileaf Corporation is required to clarify the statement that, “Trileaf finds the area within the parent parcel zoned as both Lake (L) and General Agriculture (GA) to *entirely* consist of wetland feature types;” or
 - b. Provide a determination in writing from the Chester Public Utility District (CPUD) that states, “The facility proposed is the least intrusive means of fulfilling the coverage gap” or that the location within the “GA” zoning district conflicts with their operations.
2. Requested permission from EBI Consulting to publish the RF-EME (Radio Frequency Electromagnetic Energy) Report.
3. Requested the visual simulations be included in an amended staff report.
4. Continued the public hearings to December 10, 2025, Zoning Administrator meeting at 10:00 a.m.

To address #1, on December 2, 2025, the applicant provided the letter (Exhibit 1) from Bonnie Mullaney, General Manager, Chester Public Utility District, stating the following:

"I am confirming that the current proposed location for the cell phone tower is the best location at the District's wastewater treatment plant in regard to the District's foreseeable needs. The narrow strip between the treatment points and the designated wetland area is not an option for the District to provide because that area must be kept for potential expansion of wastewater operations. There are also discharge lines to the ponds 7, 8, 9, and 10 at the perimeter of that strip."

Therefore, as the applicant provided the letter from CPUD, Planning staff has sufficient information to proceed with an analysis for Variance V 8-25/26-02 and Special Use Permit U 3-24/25-07.

Planning staff notes that the November 6, 2026 Zoning Administrator public hearing notice (Exhibit 5) for Variance V 8-25/26-02 and Special Use Permit U 3-24/25-07 included the following language:

*"CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) - VARIANCE (V 8-25/26-02) – No action is being recommended to be taken on the Variance (V 8-25/26-02) to allow additional time for the County to consult with appropriate agencies on the proposed project. A CEQA determination and action on Variance (V 8-25/26-02) is recommended to be made at a **noticed continued public hearing**.*

*CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) – SPECIAL USE PERMIT (U 3-24/25-07) – As no action is being recommended to be taken on the Special Use Permit (U 3-24/25-07) until action can be taken on the Variance (V 8-25/26-02) application. A CEQA determination and action on the Special Use Permit (U 3-24/25-07) is recommended to be made at a **noticed continued public hearing**.*

While the letter from CPUD was submitted on December 2, 2025 – eight (8) days prior to the continued public hearing date set for December 10, 2025, and past the deadline arranged between Planning staff and the applicant – the initial noticing incorporated a provision that the continued public hearings in which CEQA determinations and project actions would occur would be noticed. Pursuant to California Government Code Section 65090, public hearing notices shall be posted 10 days prior to the public hearing. Therefore, due to timing, Planning staff could not fulfill the necessary noticing requirements and additional time will be requested by Planning staff to properly notice the continued public hearing. Furthermore, additional time will allow Planning staff sufficient time to properly analyze the project and prepare recommended actions to be taken by the Zoning Administrator in relation to the California Environmental Quality Act and project actions.

To address #2, on December 3, 2025, the applicant provided an email (Exhibit 3) from Dave Keirstead, RF-EME Associate Technical Director, EBI Consulting, consenting to the release of the RF-EME report.

As exhibits to this staff report, Planning staff has included the visual simulations (Exhibit 2) and the RF-EME report (Exhibit 4).

RECOMMENDED ACTIONS:

Staff recommends the Zoning Administrator take the following action:

- I. **Continue the public hearing for Variance V 8-25/26-02 and Special Use Permit U 3-24/25-07 to January 14, 2025, at 10:00 a.m. to allow County staff sufficient time to properly notice the continued public hearing and prepare staff recommendations which will include recommended California Environmental Quality Act (CEQA) determinations and project actions.**

APPEAL PROCESS:

Pursuant to Plumas County Code Sec. 9-2.1001, an action by the Zoning Administrator is appealable to the Board of Supervisors within ten (10) days of the decision. If the tenth day lands on the weekend, the end of the appeal period will be the next working day. The appeal will need to be based on relevant information stated or submitted at, or prior to, this meeting by the applicant, any owner of real property within 300 feet of the exterior boundaries of the property involved who was present at the public hearing or who presented written testimony to the Zoning Administrator, or who may be adversely affected by the decision, or such other person whom the Board of Supervisors determines to have been adversely affected by the decision, or any County department head whose department has an interest in the decision. There is a filing fee for the appeal process. Fee information can be obtained from the Planning Department.

EXHIBITS:

1. Letter from Bonnie Mullaney, General Manager, Chester Public Utility District, received December 2, 2025.
2. Telecommunications Facility Visual Simulations (PhotoSims) dated February 26, 2025
3. Email Dave Keristead, RF-EME Associate Technical Director, EBI Consulting, dated December 3, 2025
4. RF-EME (Radio Frequency Electromagnetic Energy) Report dated February 13, 2025
5. Plumas County Zoning Administrator Notice of Public Hearing for November 6, 2025, for Variance V 8-25/26-02 and Special Use Permit U 3-24/25-07

Chester Public Utility District

*P.O. Box 503
251 Chester Airport Rd.
Chester, California 96020
(530) 258-2171 Fax (530) 258-2064
Office Hours 8:00am-4:30pm*

I am confirming that the current proposed location for the cell phone tower is the best location at the District's wastewater treatment plant in regard to the District's foreseeable needs. The narrow strip between the treatment points and the designated wetland area is not an option for the District to provide because that area must be kept for potential expansion of wastewater operations. There are also discharge lines to the ponds 7,8,9, and 10 at the perimeter of that strip.

Respectfully,

Bonnie Mullaney
Bonnie Mullaney,

Chester PUD General Manager

Dated: 11-19-25

RECEIVED

DEC 02 2025

PC Planning+Building

EXHIBIT 1



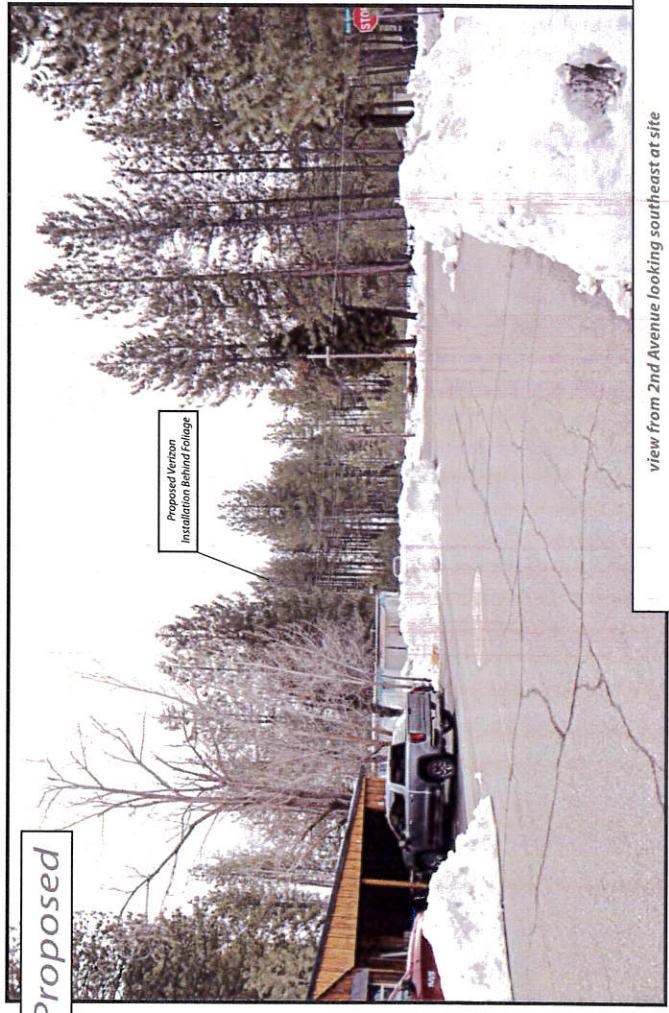
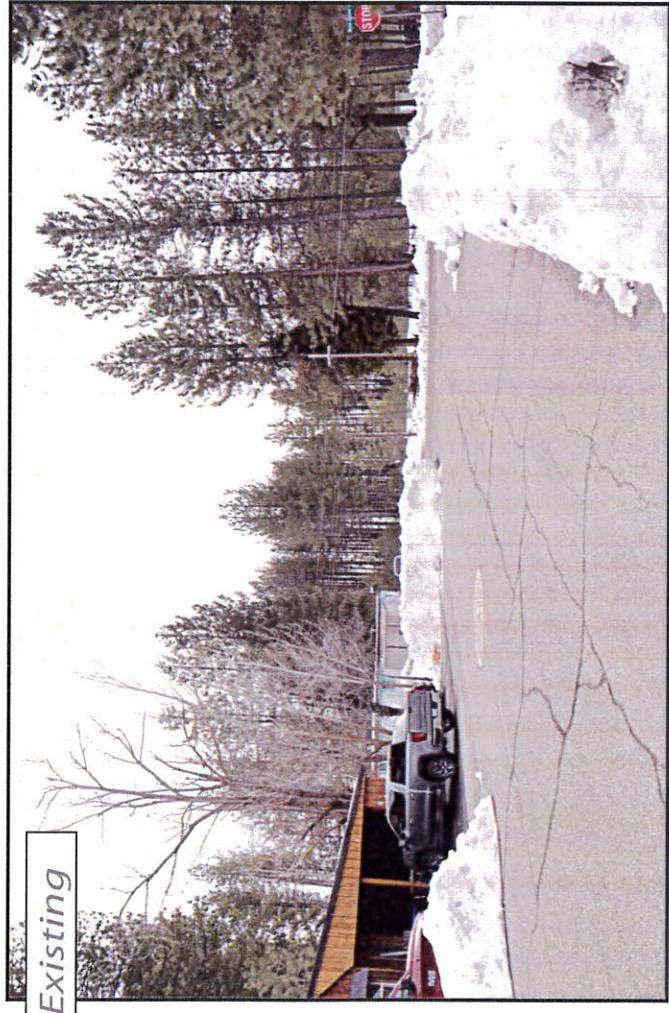
verizon 

881 First Avenue, Chester, CA
Photosims Produced on 2-26-2025

Shot Point Map

AdvanceSim Photo Simulation Solutions

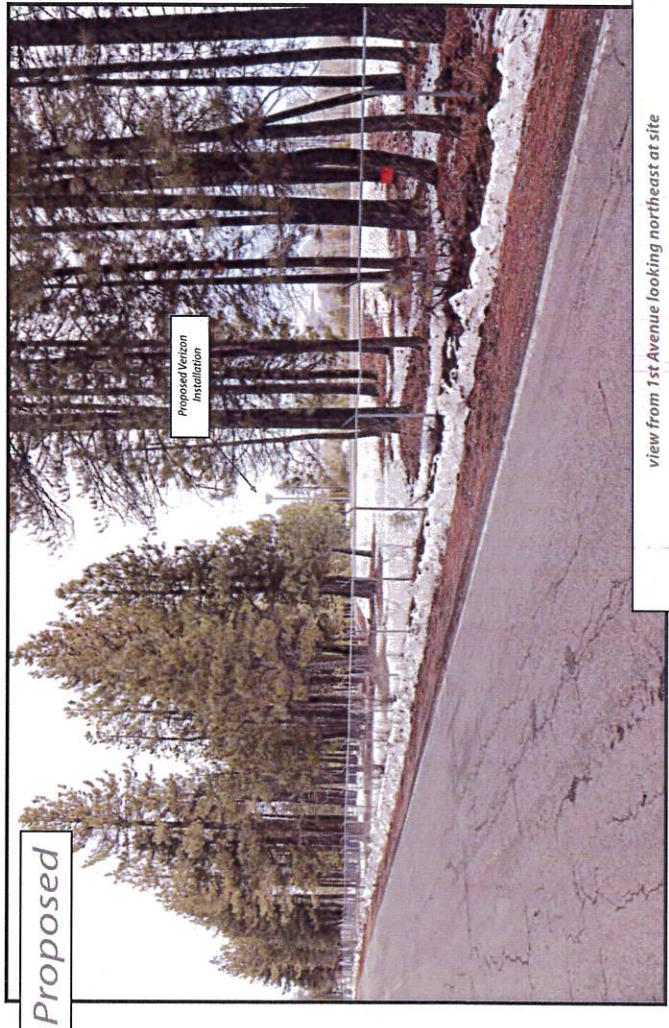
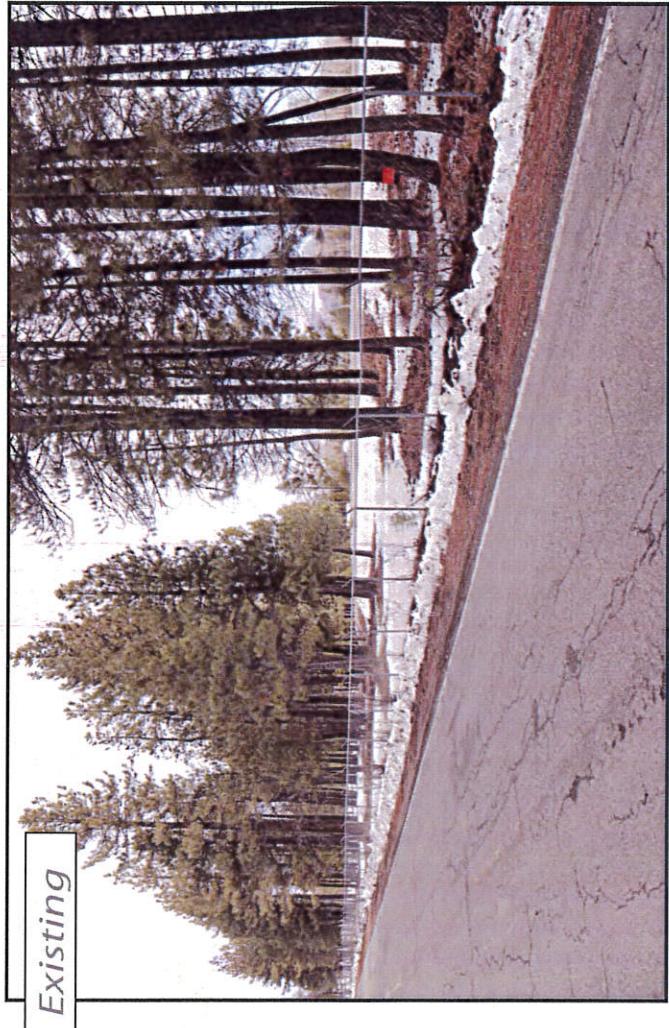
Photo Simulation Solutions
Contact (925) 202-8507



view from 2nd Avenue looking southeast at site
Chester High
881 First Avenue, Chester, CA
Photosims Produced on 2/26/2025

verizon ✓

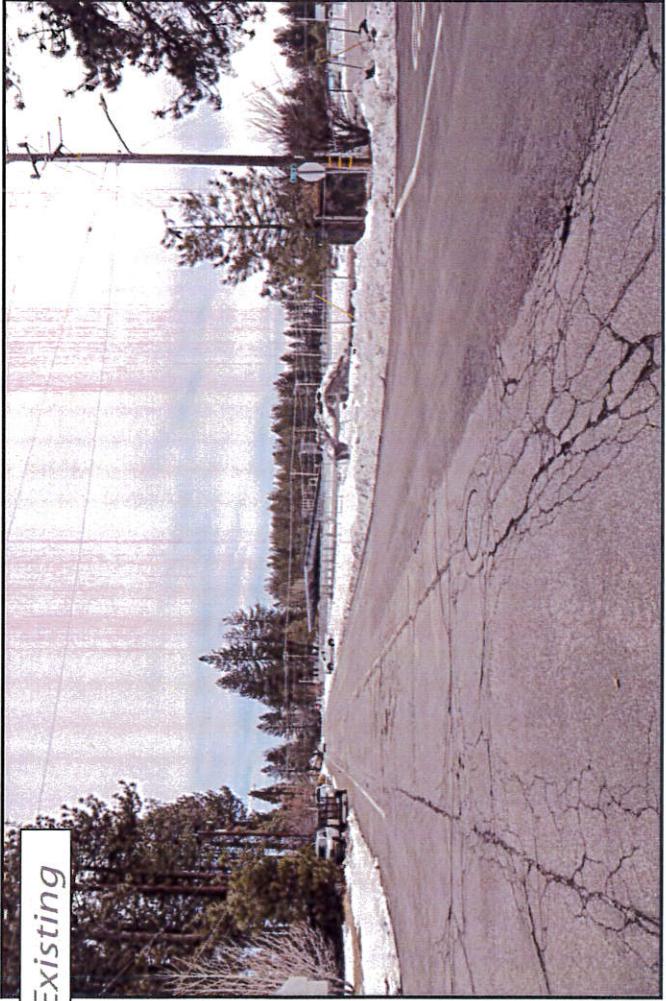
Advance Sim
Photo Simulation Solutions
Contact (925) 123-8907



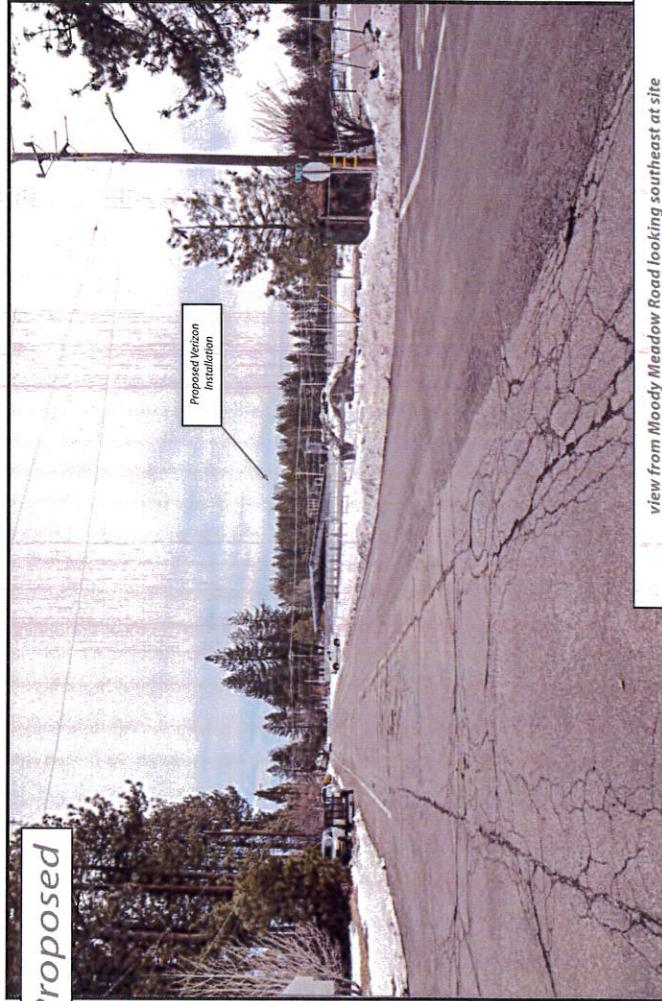
view from 1st Avenue looking northeast at site
Chester High
881 First Avenue, Chester, CA
Photosims Produced on 2-26-2025

verizon

Advance Simulations
Private Simulation Solutions
Contact (925) 362-8507



Existing



Proposed

view from Moody Meadow Road looking southeast at site
Chester' High
881 First Avenue, Chester, CA
Photosims, produced on 2-26-2025

verizon

Advance Sim
Photo Simulation Solutions
Contact (925) 1202-8507

Kevin Gallagher

From: David Keirstead <dkeirstead@ebiconsulting.com>
Sent: Wednesday, December 3, 2025 6:40 AM
To: Kevin Gallagher
Cc: Alliyah Muhammad
Subject: RE: Request for Consent to Release EME Report - Chester High

Hi Kevin,

I had to check on this with some of my colleagues at EBI.
Yes, you have our consent.

Thank you,



Dave Keirstead, PMP
RF-EME Associate Technical Director
Email: dkeirstead@ebiconsulting.com
Phone: 339-832-1750



21 B Street | Burlington, MA | 01803
www.ebiconsulting.com

[EBI's Notice of Collection and Privacy Policy](#)

From: Kevin Gallagher <KGallagher@completewireless.net>
Sent: Tuesday, December 2, 2025 5:46 PM
To: David Keirstead <dkeirstead@ebiconsulting.com>
Cc: Alliyah Muhammad <AMuhammad@completewireless.net>
Subject: RE: Request for Consent to Release EME Report - Chester High

Hi David,

I'm writing to follow up on the request below. Could you please confirm Plumas County has your consent to publish the RF-EME report EBI provided for the Verizon/TowerCo site Chester High as an exhibit to the staff report to the project? I've attached a copy for reference.

Thanks,

Kevin Gallagher
Senior Land Use Planning Manager
Complete Wireless Consulting

(916) 764-2632
(916) 313-3730 fax
KGallagher@completewireless.net
2009 V Street
Sacramento, CA 95818

From: Kevin Gallagher
Sent: Friday, November 21, 2025 4:49 PM

To: 'David Keirstead' <dkeirstead@ebiconsulting.com>
Cc: Alliyah Muhammad <AMuhammad@completewireless.net>
Subject: Request for Consent to Release EME Report - Chester High

Hi David,

I have a request for you. As you know, EBI provided an EME report on the Verizon/TowerCo site Chester High (copy attached for reference). The project is currently being reviewed by Plumas County staff. Staff would like to include EBI's report as an exhibit to the staff report for the project. We have no issue with that, but staff have informed us that there's a County policy that requires them to get your consent for the release of the report.

Could you please provide EBI's consent to release the report?

Please to hesitate to give me a call if you'd like to discuss.

Many thanks,

Kevin Gallagher
Senior Land Use Planning Manager
Complete Wireless Consulting

(916) 764-2632
(916) 313-3730 fax
KGallagher@completewireless.net
2009 V Street
Sacramento, CA 95818

Radio Frequency Electromagnetic Energy (RF-EME) Report

Prepared for Verizon Wireless

Site name:	Chester High
Verizon Wireless Site number:	781469
EBI site number:	041941-PR
Address:	881 First Avenue, Chester, CA 96020,
Latitude:	40.3018
Longitude:	-121.2251
Structure Type:	Monopole
Report Writer:	Kobi Thompson
Original Report Date:	13 February 2025



Prepared by EBI Consulting
EBI | BUILDING VALUE
SUSTAINABLY

T: (781) 273-2500

E: info@ebiconsulting.com

W: ebiconsulting.com ¹

EXHIBIT 4

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Executive summary

Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by Verizon Wireless to conduct radio frequency electromagnetic (RF-EME) modeling for Verizon Wireless upgrade to an existing facility ("facility.") located on the existing and Site 781469 – Chester High, located at 881 First Avenue, Chester, CA 96020, to determine RF-EME exposure levels from proposed **Verizon** telecommunications equipment at this site. As described in greater detail in Appendix C – Federal Communications Commission (FCC) Requirements of this report, the FCC has developed Maximum Permissible Exposure (MPE) Limits for the general population and for occupational activities. The FCC requires wireless system operators to perform an assessment of potential human exposure to RF fields emanating from all transmitting antennas at a site whenever antenna operations are added or modified, and to ensure compliance with the MPE limit in the FCC regulations. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME regulations/compliance standards

This report describes modeling calculations of RF levels associated with the existing and proposed antennas. We have performed 3-dimensional modeling calculations to account for the effects of the antennas at all roof level(s) and at street level employing standard FCC mathematical models for calculating the effects of the antennas in a conservative manner. Therefore, our results provide worst-case RF levels to ensure the conclusions are conservative with regard to compliance with the FCC limit for safe continuous exposure.

Statement of Compliance

There are no other existing antenna carriers at the site to include in the compliance assessment. Note that FCC regulations require any future antenna collocators to assess and assure continuing compliance based on the cumulative effects of all then-proposed and then-existing antennas at the Site. As presented in the sections below, our conclusions are based on worst-case modeling calculations related to the existing and proposed antennas.

At ground level, the maximum cumulative exposure level from Verizon Wireless at this Site is approximately 3.909 percent of the FCC's general population limit (0.782 percent of the FCC's occupational limit).

Notwithstanding, workers climbing/accessing the Monopole should be informed about the presence and locations of antennas and their associated fields. Due to the use of such conservative calculations for purposes of our analysis, it should be noted that the exposure levels actually caused by the antennas will likely be less significant than the calculated results herein.

As the site is in compliance with applicable FCC limits as designed, there are no additional control measures required (See Section 3). Notwithstanding, it is also recommended that in

connection with a lockout/tagout procedure, any non-Verizon Wireless worker/contractor who will be working on the «Site_Type» contact Verizon Wireless since only Verizon Wireless has the ability to lockout/tagout the Facility, or to authorize others to do so.

1. Site Description

This project site includes the following **Verizon** wireless telecommunication antennas on a Monopole located at 881 First Avenue, Chester, CA 96020.

Ant ID	Owner	Antenna model	Mech. Downtilt (°)	Azimuth (°)	Height (ft)	Technology and Frequency	Elec. Tilt (°)	HBW (°)	Aperture (feet)	Total Power Input	Antenna Gain (dBd)	Total ERP (Watts)
A1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	70	123	LTE 1900	2	121.7	3.94	240	20.41	26376.14
A1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	70	123	LTE 2100	2	121.1	3.94	240	21.01	30283.86
A2	Verizon	AIR 6419 B77D Envelope	0	70	123.8	3.82GHz	0	99.2	1.7	320	22.95	50136.03
A3	Verizon	MX12FIT865-01	0	70	121	LTE 700	2 to 12	69	8.01	240	12.95	4733.81
A3	Verizon	MX12FIT865-01	0	70	121	LTE 850	2 to 12	62	8.01	240	13.35	5190.52
B1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	220	123	LTE 1900	2	121.7	3.94	240	20.41	26376.14
B1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	220	123	LTE 2100	2	121.1	3.94	240	21.01	30283.86
B2	Verizon	AIR 6419 B77D Envelope	0	220	123.8	3.82GHz	0	99.2	1.7	320	22.95	50136.03
B3	Verizon	MX12FIT865-01	0	220	121	LTE 700	2 to 12	69	8.01	240	12.95	4733.81
B3	Verizon	MX12FIT865-01	0	220	121	LTE 850	2 to 12	62	8.01	240	13.35	5190.52
C1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	330	123	LTE 1900	2	121.7	3.94	240	20.41	26376.14
C1	Verizon	AIR 3283 B25 B66 32 Ports Envelope	0	330	123	LTE 2100	2	121.1	3.94	240	21.01	30283.86
C2	Verizon	AIR 6419 B77D Envelope	0	330	123.8	3.82GHz	0	99.2	1.7	320	22.95	50136.03
C3	Verizon	MX12FIT865-01	0	330	121	LTE 700	2 to 12	69	8.01	240	12.95	4733.81
C3	Verizon	MX12FIT865-01	0	330	121	LTE 850	2 to 12	62	8.01	240	13.35	5190.52

*A duty cycle of 80% has been applied to all CBRS, mmWave and C-Band technologies. This is reflected in the total ERP.

The above tables contain an inventory of proposed Verizon Antennas and other carrier antennas if sufficient information was available to model them. Note that EBI uses an assumed set of antenna specifications and powers for unknown and other carrier antennas for modeling purposes. The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general population/uncontrolled exposure limits for members of the general public that may be exposed to antenna fields. While access to this site is considered controlled, the analysis has considered exposures with respect to both controlled and uncontrolled limits as an untrained worker may access adjacent rooftop locations. Additional information regarding controlled/uncontrolled exposure limits is provided in Appendix C. Appendix B presents a site safety plan that provides a plan view of the Monopole with antenna locations.

2. Worst-Case Predictive Modeling

This section provides details of the installation that the compliance assessment is performed for. Information about the compliance calculation software utilized, predicted emission results and antenna safety setbacks are included.

Compliance simulation software

The IXUS electromagnetic field (EMF) calculation software was used to assess all the RF field levels presented in this study. IXUS (<https://ixusapp.com/>) is a software product of Alphawave Mobile Network Products (Pty) Ltd, who specialize in electromagnetic software and systems. The IXUS software uses a fast and accurate EMF calculation tool that allows for the determination of RF field strength in the vicinity of radio communication base stations and transmitters. At its core, the IXUS EMF calculation module implements field evaluation techniques detailed in the ITU-T K.61, CENELEC 50383, and IEC62232 specifications. The calculation of EMF results at any point in 3-D space is achieved by either a synthetic ray tracing technique, a conservative cylindrical envelope method, or through full-wave EM simulation results obtained from a computational electromagnetic software tool.

The selection of the solution method is determined by the specific antenna being considered. In addition, a conservative and verified modelling technique for 5G beamforming antennas in IXUS is used. The simulation accuracy of the IXUS calculation module has been verified extensively with full-wave EM simulations.

IXUS version number: 4.13 (0)2024.3.0 (Calculator: 2024.3).

Compliance exposure standard: FCC OET 65.

The parameters used for modeling are summarized in the Site Description antenna inventory table above.

There are no other wireless carriers with equipment installed at this site.

Modeling Results

At ground level the maximum cumulative exposure level from all carriers/Verizon Wireless at this Site is approximately 3.909 percent of the FCC's general population limit (0.782 percent of the FCC's occupational limit. The worst-case emitted power density from the proposed Verizon Wireless antennas at the Site is immediately in front of the antennas transmitting into free space (midair/away from any walking surface). Notwithstanding, workers climbing the Monopole should be informed about the presence and locations of antennas and their associated fields.

A site would be considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

The inputs used in the modeling are summarized in the Site Description antenna inventory table above. Signage recommendations based on the IXUS™ modeling results are presented in Appendix B.

3. Mitigation/Site Control Options

EBI's modeling indicates that there are no areas in front of the Verizon antennas that exceed the FCC standards for occupational or general public exposure. All exposures above the FCC's safe limits require that individuals be elevated above the ground. In accordance with the official Verizon Wireless Signage and Demarcation Policy for tower structures, no signage is recommended at this site.

Barriers are recommended for installation when possible to block access to the areas in front of the antennas that exceed the FCC general public and/or occupational limits. Barriers may consist of rope, chain, or fencing. Painted stripes should only be used as a last resort. There are no barriers recommended on this site.

These protocols and recommended control measures have been summarized and included with a graphic representation of the antennas and associated signage and control areas in a RF-EME Site Safety Plan, which is included as Appendix B. Individuals and workers accessing the Monopole should be provided with a copy of the attached Site Safety Plan, made aware of the posted signage and barriers, and signify their understanding of the Site Safety Plan.

To reduce the risk of exposure, EBI recommends that access to areas associated with the active antenna installation be restricted and secured where possible. All persons accessing elevated positions on adjacent structures (ex. rooftop, utility pole, monopole, etc.) along with nearby elevated features, such as trees, within areas exceeding the general public MPE, must be made aware of the presence and locations of antennas and their associated fields, where applicable.

4. Summary and Conclusions

EBI has prepared a Radiofrequency - Electromagnetic Energy (RF-EME) Compliance Report for telecommunications equipment installed by **Verizon Wireless** Site 781469 - Chester High, located at, Chester, CA 96020, , to determine worst-case predicted RF-EME exposure levels from wireless communications equipment installed at this site. This report summarizes the results of RF-EME modeling in relation to relevant Federal Communications Commission (FCC) RF-EME compliance standards for limiting human exposure to RF-EME fields.

As presented in the sections above, based on the FCC criteria, there are no modeled areas on any accessible roof level walking/working surface related to the Verizon antennas that exceed the FCC's occupational or general public exposure limits at this site.

Workers should be informed about the presence and locations of antennas and their associated fields. Recommended control measures are outlined in Appendix B - Radio Frequency Electromagnetic Energy Safety Information and Signage Plans; **Verizon Wireless** should also provide procedures to shut down and lockout/tagout this wireless equipment in accordance with their own standard operating protocol. Non-telecom workers who will be working in areas of exceedance are required to contact **Verizon Wireless** since only **Verizon Wireless** has the ability to lockout/tagout the facility, or to authorize others to do so.

5. Limitations

This report was prepared at the request of Verizon Wireless. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information «SVGen1» provided by the client. At the time of this report, no additional areas were identified on adjacent elevated surfaces that exceed the FCC's general population MPE. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the Site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix A – Certifications

I, Kobi Thompson, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation.
- I have reviewed the data provided by the client and incorporated it into this RF EME Report, such that the information contained in this report is true and accurate to the best of my knowledge.

Signed: *Kobi Thompson*

By: Kobi Thompson

Reviewed and Approved by:



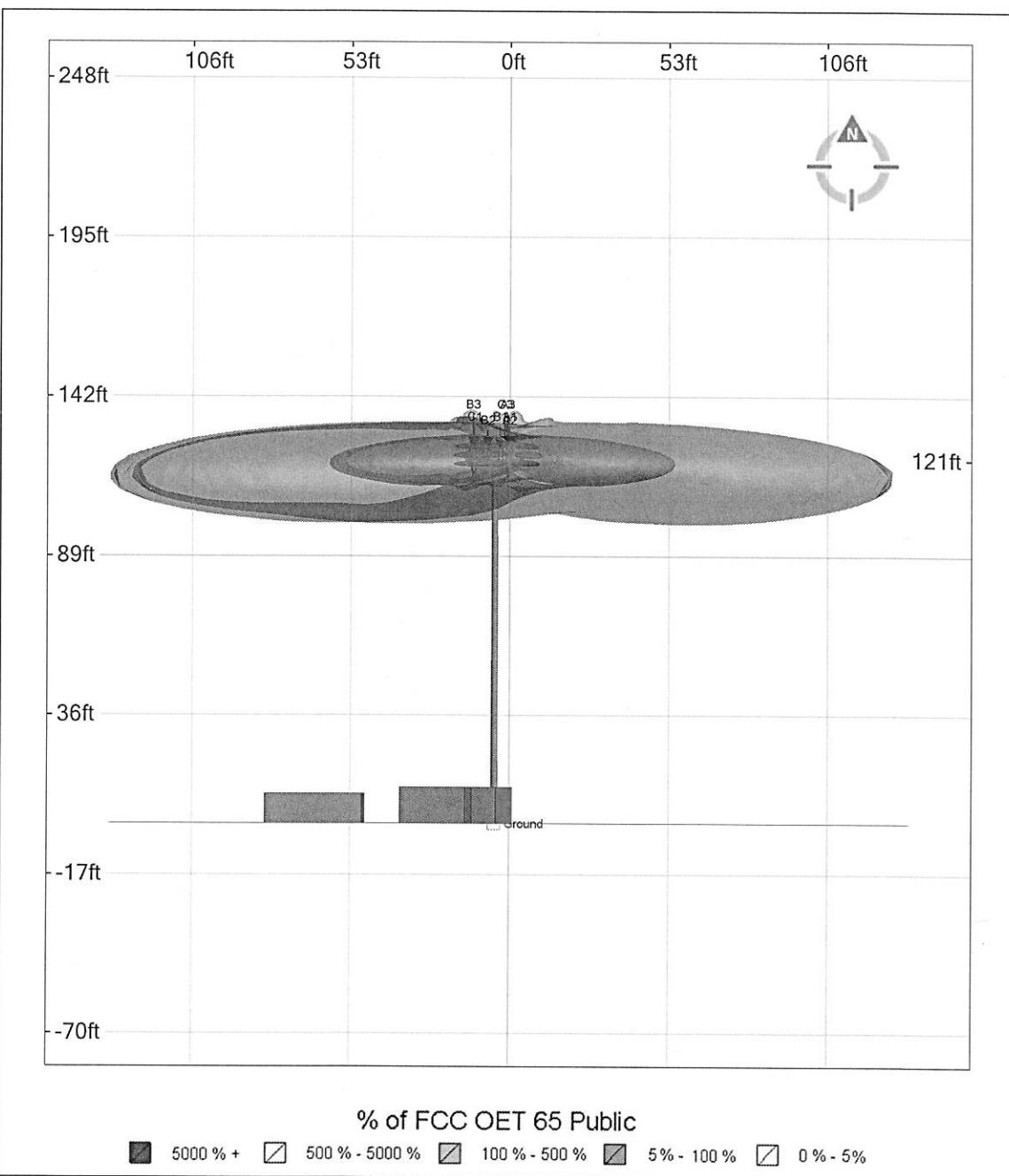
sealed 14feb2025

Michael McGuire
Electrical Engineer
mike@h2dc.com

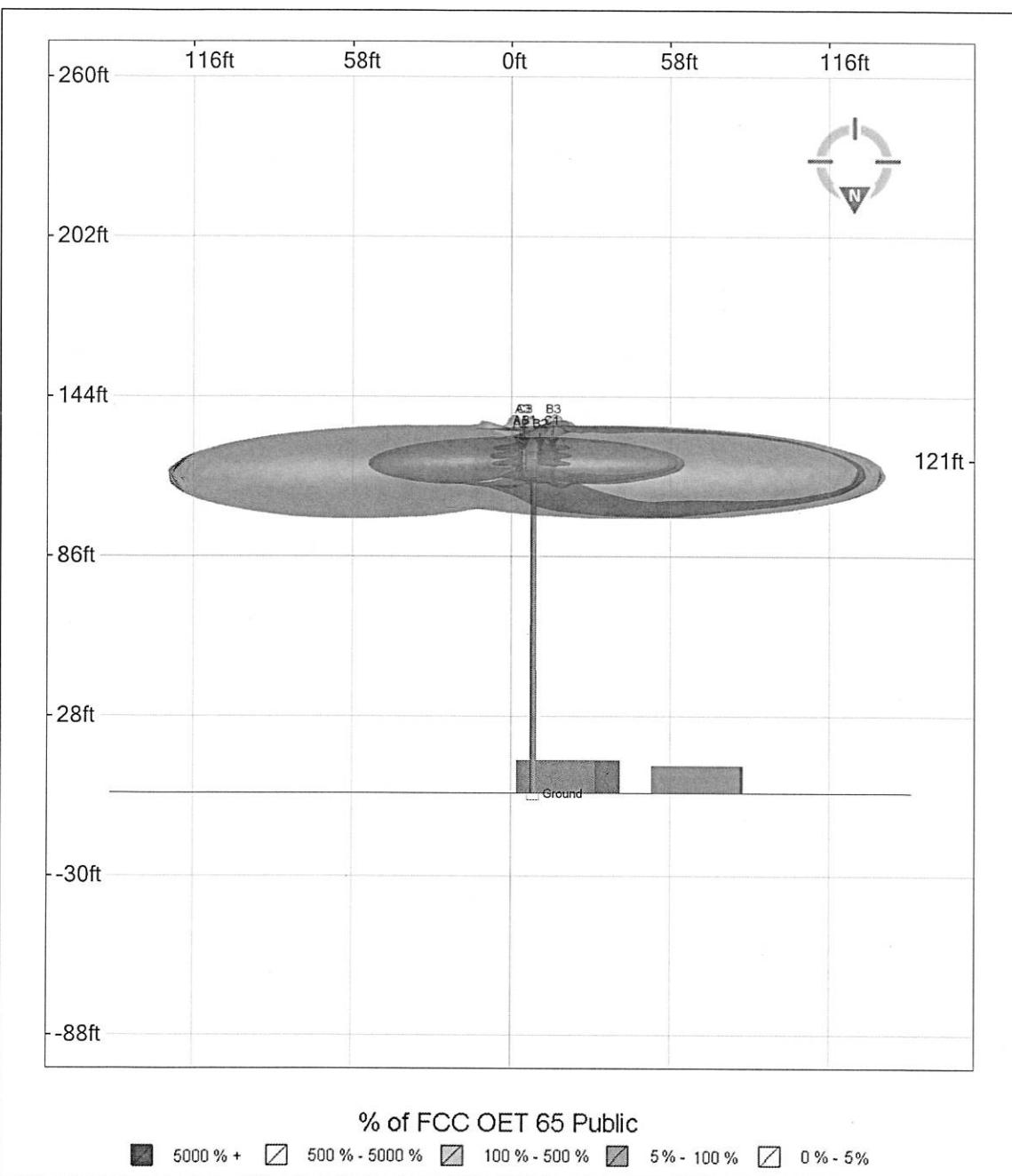
Note that EBI's scope of work is limited to an evaluation of the Radio Frequency - Electromagnetic Energy (RF-EME) field generated by the antennas and broadcast equipment noted in this report. The engineering and design of the building and related structures, as well as the impact of the antennas and broadcast equipment on the structural integrity of the building, are specifically excluded from EBI's scope of work.

Appendix B – Radio Frequency Electromagnetic Energy Safety Information and Signage Plans

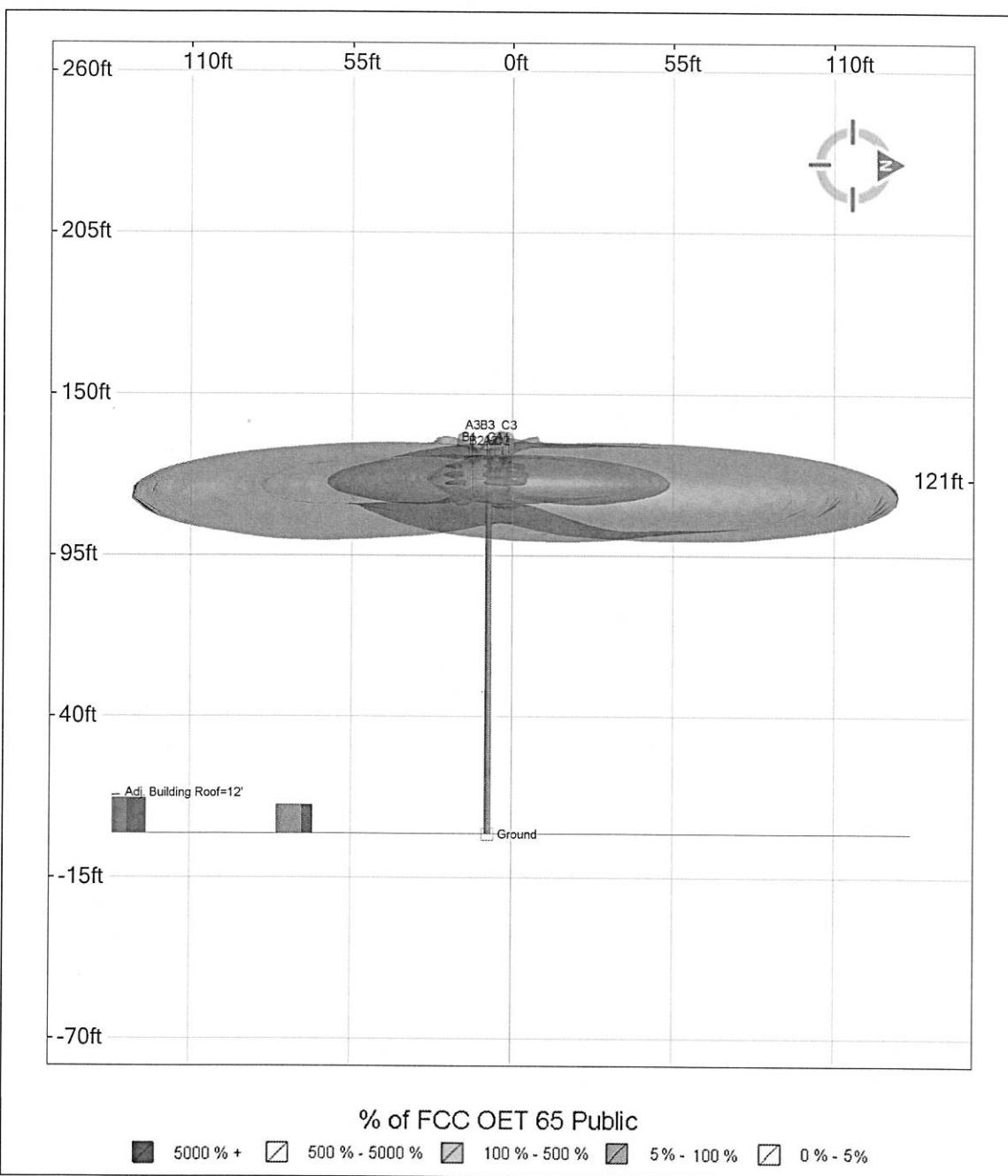
North Elevation View



South Elevation View

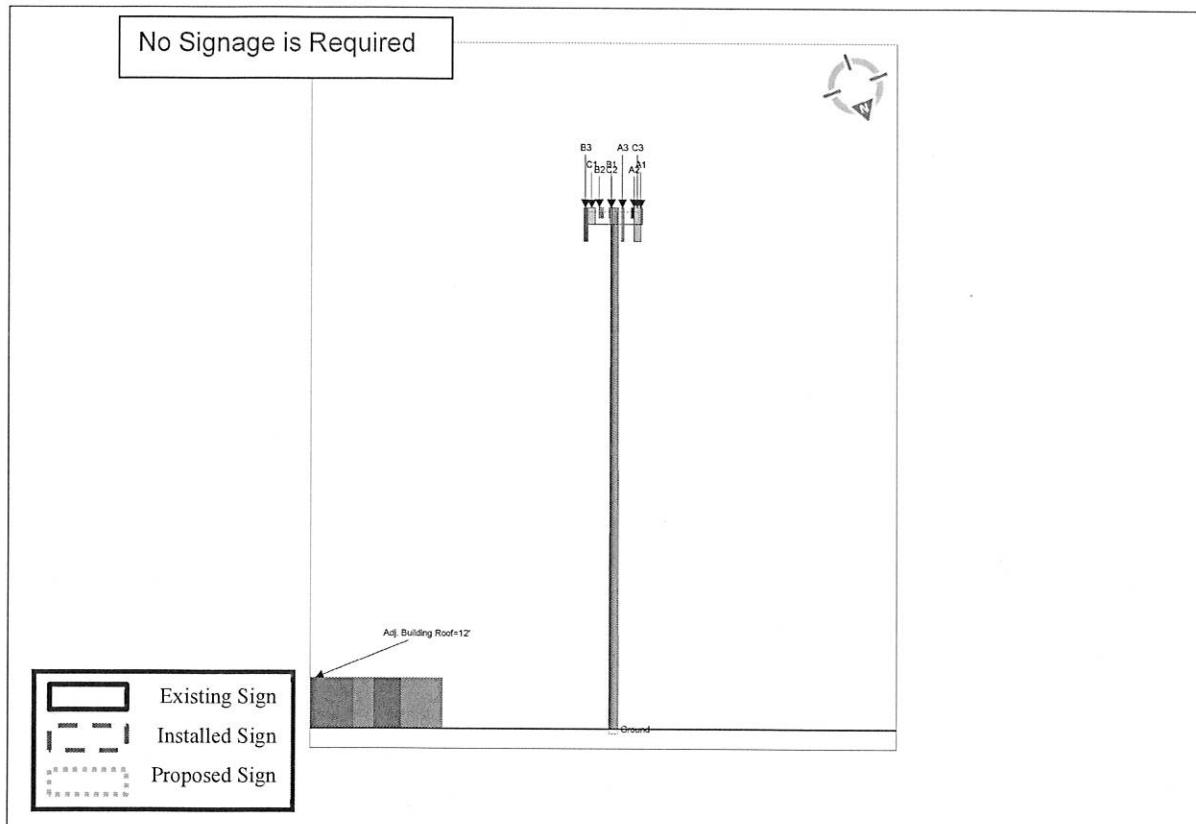


East Elevation View



a. Site Mitigation Diagram (Signage/Barriers)

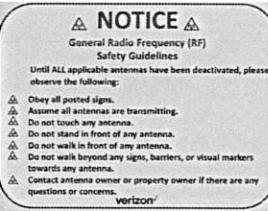
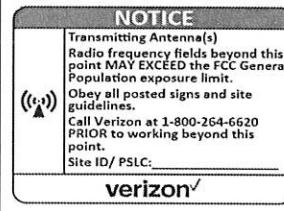
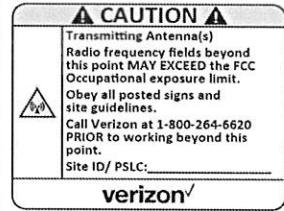
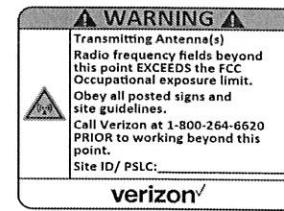
Signage Diagram



RF Signage and Safety Information

RF Signage

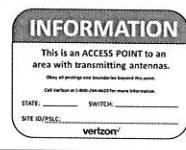
Areas or portions of any transmitter site may be susceptible to high power densities that could cause personnel exposures in excess of the FCC guidelines. These areas must be demarcated by conspicuously posted signage that identifies the potential exposure. Signage MUST be viewable regardless of the viewer's position.

GUIDELINES	Category Two - Notice	Category Three - Caution	Category Four - Warning
This sign will inform anyone of the basic precautions to follow when entering an area with transmitting radiofrequency equipment.	<p>This sign indicates that RF emissions may exceed the FCC General Population MPE limit.</p> <ul style="list-style-type: none"> • Sign Color Blue • Sign Signal Word "Notice" 	<p>This sign indicates that RF emissions may exceed the FCC Occupational MPE limit.</p> <ul style="list-style-type: none"> • Sign Color Yellow • Sign Signal Word "Caution" 	<p>This sign indicates that RF emissions may exceed at least 10x the FCC Occupational MPE limit.</p> <ul style="list-style-type: none"> • Sign Color Orange for Warning • Sign Signal Word "Warning"
			

Category One - Information

Information signs are used as a means to provide contact information for any questions or concerns. They will include specific cell site identification information and the Verizon Wireless Network Operations Center phone number.

- Sign Color Green



Physical Barriers

Physical barriers are control measures that require awareness and participation of personnel. Physical barriers are employed as an additional administration control to complement RF signage and physically demarcate an area in which RF exposure levels may exceed the FCC General Population limit. **Example:** chain-connected stanchions

Indicative Markers

Indicative markers are visible control measures that require awareness and participation of personnel, as they cannot physically prevent someone from entering an area of potential concern. Indicative markers are employed as an additional administration control to complement RF signage and visually demarcate an area in which RF exposure levels may exceed the FCC General Population limit. **Example:** paint stripes

Occupational Safety and Health Administration (OSHA) Requirements

A formal adopter of FCC Standards, OSHA stipulates that those in the Occupational classification must complete training in the following: RF Safety, RF Awareness, and Utilization of Personal Protective Equipment. OSHA also provides options for Hazard Prevention and Control:

Hazard Prevention	Control
<ul style="list-style-type: none"> • Utilization of good equipment • Enact control of hazard areas • Limit exposures • Employ medical surveillance and accident response 	<ul style="list-style-type: none"> • Employ Lockout/Tag out • Utilize personal alarms & protective clothing • Prevent access to hazardous locations • Develop or operate an administrative control program

Appendix C – Federal Communications Commission (FCC) Requirements

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/ controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table 1 and Figure 1 (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm^2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm^2) and an uncontrolled MPE of 1 mW/cm^2 for equipment operating in the 1900 MHz frequency range. These limits are considered protective of these populations.

Table 1: Limits for Maximum Permissible Exposure (MPE)

(A) Limits for Occupational/Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ²)*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6
1,500-100,000	--	--	5	6

(B) Limits for General Public/Uncontrolled Exposure

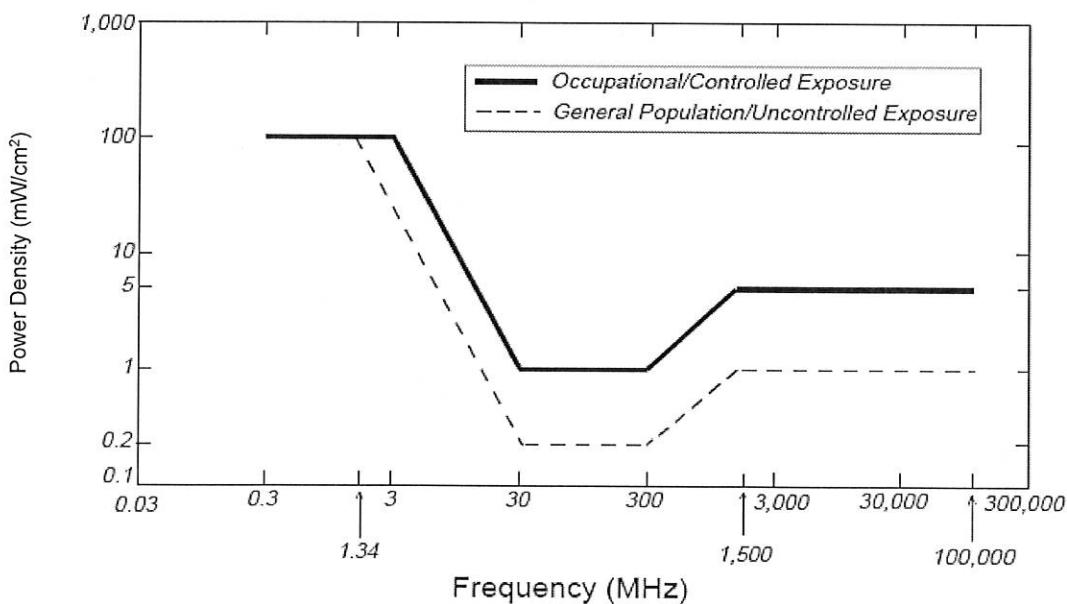
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f ²)*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)

* Plane-wave equivalent power density

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)

Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Microwave (Point-to-Point)	5,000 - 80,000 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Broadband Radio (BRS)	2,600 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Wireless Communication (WCS)	2,300 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Advanced Wireless (AWS)	2,100 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Cellular Telephone	870 MHz	2.90 mW/cm ²	0.58 mW/cm ²
Specialized Mobile Radio (SMR)	855 MHz	2.85 mW/cm ²	0.57 mW/cm ²
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm ²	0.47 mW/cm ²
Most Restrictive Frequency Range	30-300 MHz	1.00 mW/cm ²	0.20 mW/cm ²

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by wireless carriers in this area will potentially operate within a frequency range of 600 to 5000 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

FCC Compliance Requirement

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.



Notice of Public Hearing Plumas County Zoning Administrator

The Plumas County Zoning Administrator will hold a Special Meeting for two associated Public Hearings on:

Thursday, November 6, 2025

3:00 PM

555 Main Street, Conference Room
Quincy, CA

APPLICANTS – TowerCo LLC and Verizon Wireless

OWNER – Chester Public Utility District.

PUBLIC HEARING #1 – The Plumas County Planning Department received a Variance (V 8-25/26-02) application for a telecommunications facility on a parcel zoned Rural ("R-10") to allow an increase in the height limit from thirty-five (35) feet to one hundred twenty-nine (129) feet. The proposed project is located at 881 First Avenue, Chester, unincorporated Plumas County, CA; APN 100-270-006; T28N/R7E/Sec. 8, MDM.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) – VARIANCE (V 8-25/26-02) – No action is being recommended to be taken on the Variance (V 8-25/26-02) to allow additional time for the County to consult with appropriate agencies on the proposed project. A CEQA determination and action on Variance (V 8-25/26-02) is recommended to be made at a noticed continued public hearing.

PUBLIC HEARING #2 – The Plumas County Planning Department received a Special Use Permit (U 3-24/25-07) application to allow the construction of a one hundred twenty-nine (129) foot telecommunications tower on a parcel zoned Rural ("R-10"). The proposed project is located at 881 First Avenue, Chester, unincorporated Plumas County, CA; APN 100-270-006; T28N/R7E/Sec. 8, MDM.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) – SPECIAL USE PERMIT (U 3-24/25-07) – As no action is being recommended to be taken on the Special Use Permit (U 3-24/25-07) until action can be taken on the Variance (V 8-25/26-02) application. A CEQA determination and action on the Special Use Permit (U 3-24/25-07) is recommended to be made at a noticed continued public hearing.

INTERESTED PARTIES – All interested parties are welcome to attend the public hearing and will be given an opportunity to address the Zoning Administrator and provide public comment. If individuals challenge the project in court, those individuals may be limited to raising only those issues raised by the individuals or others at the public hearing, or issues submitted in written correspondence delivered to the Zoning Administrator at, or prior to, the public hearing.

PUBLIC COMMENT - Written comments can be mailed to the Plumas County Planning Department, ATTN: Tracey Ferguson, Zoning Administrator, 555 Main Street, Quincy, CA, 95971, or emailed to the staff planner for the proposed project, Tim Evans, Senior Planner, at TimEvans@countyofplumas.com.

For further information, contact:

Tim Evans, Senior Planner
Plumas County Planning Department
555 Main Street, Quincy, CA
(530) 283-6207
TimEvans@countyofplumas.com

Notice posted on October 24, 2025, at the following three public places (CA Government Code Section 65090 and 65091):
555 Main Street, Quincy, CA; 520 Main Street, Quincy, CA; and 218 Laurel Lane, Chester, CA; and
mailed to all property owners within 300 feet of the property subject to the public hearing.
Additionally, this Notice of Public Hearing is published on the Zoning Administrator's website at:
<https://www.plumascounty.us/2180/Zoning-Administrator>

EXHIBIT 5