

County of San Mateo  
Planning and Building Department

**INITIAL STUDY  
ENVIRONMENTAL EVALUATION CHECKLIST**  
(To Be Completed by Planning Department)

1. **Project Title:** Renew existing Metro PCS cell facility, legalize existing AT&T cell facility, 2,065 cubic yards of grading to repair existing eroded hiking trail/access road.
2. **County File Number:** PLN 2017-00135 (AT&T) and PLN 2006-00075 (Metro PCS)
3. **Lead Agency Name and Address:** County of San Mateo Planning and Building Department  
455 County Center, 2nd Floor, Redwood City, CA 94063
4. **Contact Person and Phone Number:**  
Olivia Boo, Project Planner, 650/363-1818, [oboo@smcgov.org](mailto:oboo@smcgov.org)
5. **Project Location:** 3501 Whiting Ridge Road, Montara
6. **Assessor's Parcel Number and Size of Parcel:** 036-370-020, (cellular equipment), 036-330-030, 036-340-020, 036-340-050, 036-340-070, and 036-332-020 (hiking trail/access road), approximately 20 acres
7. **Project Sponsor's Name and Address:** John Merritt, AT&T Mobility, 630 Quintana Road, Suite 321, Morro Bay, CA 93442.
8. **Name of Person Undertaking the Project or Receiving the Project Approval (if different from Project Sponsor):** N/A
9. **General Plan Designation:** Open Space, Public Recreation
10. **Zoning:** Multiple Zonings  
PLN 2017-00135 AT&T facility: Resource Management-Coastal Zone/Design Review/Coastal Development (RM-CZ/DR/CD).  
PLN 2006-00075 Metro PCS facility: Resource Management (RM).  
Access road improvements: Resource Management-Coastal Zone/Design Review, Planned Agricultural District/Coastal Development (RM-CZ/PAD/DR/CD).
11. **Description of the Project:** PLN 2017-00135: After-the-Fact Use Permit, Coastal Development Permit, Resource Management-Coastal Zone District Permit, Design Review Permit, and Grading Permit to legalize an existing AT&T cellular facility constructed without permits.

The existing AT&T facility is mounted on a 40 ft. wooden tower that is supported by four posts. The highest mounted antennae is at 60 feet. The facility has two equipment shelter sheds, one shelter is 285 sq. ft. located within the footprint of the tower, the second equipment shelter, 556 sq. ft., is located 40 feet west of the tower. The shed, located directly below the antennas

tower, is enclosed by a chain link fence. The second shed is not enclosed within a chain link fence, however, it is a secured building.

PLN 2006-00075: Use Permit Renewal, Coastal Development Permit, Resource Management District Permit, Planned Agriculture District Permit, and Grading Permit for an existing Metro PCS facility.

The existing Metro PCS facility includes antennas attached to three wood monopoles, an existing 70 sq. ft. shelter and propane tank.

The project also includes restoring and repairing an existing access/trail road that provides vehicle access to the existing cellular facilities, including 18,500 linear feet (3.5 miles) of road blading to repair the roadway and to construct five (5) fire turnouts. The same dirt road also serves as a walking/hiking park trail within the McNee state park and is open to the public. The dirt road is in disrepair due to years of erosion. Grading repair includes 2,065 cubic yards of cut and fill for soil to be relocated on site to repair erosion. Tree removal or trimming may be performed only as necessary for adequate vertical clearance. Five new fire truck turnouts are also proposed to provide adequate fire truck access through the park and to the peak where the existing cellular sites are located.

12. **Surrounding Land Uses and Setting:** The approximately 20-acre parcel is located in the unincorporated area of Montara mountain. The subject parcel is to the southwest of San Pedro Valley County Park with an existing unpaved dirt road leading to both the AT&T and Metro PCS sites and other existing cellular facilities.
13. **Other Public Agencies Whose Approval is Required:** The following agencies shall provide property owner consent to the grading repair project as they are underlying property owners to the hiking trail/access road. The following agencies are underlying property owners: National Park Service, Golden Gate National Recreation Areas (part of the National Park Service), San Mateo County Parks and North Coast County Water District.
14. **Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?:** *(NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21080.3.2.). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality).*

No Native American tribe has requested consultation to date, pursuant to Public Resources Code Section 21080.3.1. See further discussion under Section 18.

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Significant Unless Mitigated” as indicated by the checklist on the following pages.

	Aesthetics		Energy		Public Services
	Agricultural and Forest Resources	X	Hazards and Hazardous Materials		Recreation
X	Air Quality	X	Hydrology/Water Quality	X	Transportation
X	Biological Resources		Land Use/Planning	X	Tribal Cultural Resources
	Climate Change		Mineral Resources		Utilitie/Service Systems
X	Cultural Resources		Noise		Wildfire
X	Geology/Soils		Population/Housing		Mandatory Findings of Significance

## EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an

earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:

- a. **Earlier Analysis Used.** Identify and state where they are available for review.
  - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. **Mitigation Measures.** For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. **Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances).** Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
  7. **Supporting Information Sources.** Sources used or individuals contacted should be cited in the discussion.

<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
	<i><b>Potentially Significant Impacts</b></i>	<i><b>Significant Unless Mitigated</b></i>	<i><b>Less Than Significant Impact</b></i>	<i><b>No Impact</b></i>
1.a. Have a substantial adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?			X	
<p><b>Discussion:</b> The subject parcel is located approximately 250 feet outside of the Cabrillo Highway/Highway 1 County Scenic Corridor which is the closest scenic corridor. The project will not significantly impact views from any public roads, water bodies, or from the scenic corridor itself, due to the surrounding topography and dense vegetation. Both the existing Metro PCS facility and the unpermitted AT&amp;T cellular facility are located at the top of Peak Mountain, within the Montara Mountain area, east of McNee Ranch State Park. Both sites are existing and visible from Alta Vista and North Peak Access Road Trails since the cellular equipment is at the top of Montara Mountain and is accessible by the public hiking trail/access road path in the park. The dirt access road, Whiting Ridge Road, is vegetated on both sides. Adjacent land generally consists of undeveloped open space within the McNee State Park. No water bodies are located in the immediate area. The hiking trail/access road runs through public land owned by North Coast County Water District and San Mateo County.</p> <p>Both cellular facilities are visible from public lands. The unpermitted AT&amp;T facility is already constructed and includes other non-AT&amp;T equipment, such that the other equipment is collocated on AT&amp;T’s structure and considered a minor addition. The Metro PCS facility is a permitted site and</p>				

according to permit records, was the first equipment facility permitted on the property. The proposal project includes renewing the existing Metro PCS site. No new structures are proposed for this carrier. Grading repair of the existing hiking path is proposed to repair the severely eroded trail, however, repair will be at ground level and is not expected to effect views.

**Source:** Site plans, Google Maps.

1.b. Substantially damage or destroy scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
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**Discussion:** The subject parcel is located 250 feet outside and east of the Cabrillo Highway/Highway 1 County Scenic Corridor. The project sites are not located within or in close proximity to a scenic resource. No trees are proposed for removal, and there are no known outcroppings or historic buildings. The project may involve trimming trees and vegetation to provide a 15-foot vertical clearance as needed for construction vehicles. The Metro PCS facility is existing. The AT&T facility is requesting to be legalized. The legalization of the facility will involve legalizing existing equipment mounted to the existing structure. Minor changes are anticipated to the AT&T facility for building code compliance as part of the building permit process. A majority of the access road is located within the Cabrillo Highway/Highway 1 County Scenic Corridor. Repair of the road may be located within the scenic corridor but will not cause significant visual impact as work will be short term in duration and is limited to grading work on the existing access road/trail, at ground level and so would not be significantly visible.

**Source:** Project Location, Site Plans.

1.c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings, such as significant change in topography or ground surface relief features, and/or development on a ridgeline? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
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**Discussion:** The project site is located on the Montara mountain, south of San Pedro Valley County Park, and southeast of McNee Ranch State Park, and surrounded by open space. The property has split zoning, Resource Management/Design Review/Coastal Development for the AT&T facility (PLN 2017-00135) and Resource Management for the Metro PCS facility (PLN 2006-00075). General Plan policies and Zoning Regulation development standards require that development minimize tree removal and natural topography alterations. Both cell facilities are visible from the publicly accessible road/trail. There are no additional impacts from Metro PCS (PLN 2006-00075). The AT&T facility is being legalized which includes antennas mounted on the existing wood tower and two ground level equipment sheds. The increase in visible intensity is minor, clustered together and blending with similar equipment.

Grading to repair the severely eroded dirt access road will include conformance with fire access standards and consists of 18,500 linear feet (3.5 miles) of road blading to repair the roadway and construct five (5) fire turnouts. Approximately 2,065 cubic yards of grading is anticipated. Since the road improvements are at grade level and the AT&T cellular facility is collocated on an existing structure with other existing equipment, views are not expected to be significantly impacted than what currently exists. Although the AT&T facility is proposed to be legalized, there is other existing equipment on the structure. The Metro PCS site was the first facility to exist at the site, no changes are proposed to the Metro PCS facility. No additional visual impacts are expected from the Metro PCS.

**Source:** Project Location; San Mateo County General Plan; Scenic Resources Map. Project Plans.

1.d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				X
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**Discussion:** There are no lights indicated on the project plans for either facility. There is no increase in visible intensity from the Metro PCS facility, as it is a legal site with no changes proposed. The AT&T facility already exists and is requesting to be legalized which involves existing antennas mounted on the wood tower and two ground level equipment sheds. The increase in visible intensity is minor, the AT&T equipment is clustered together and blending with similar equipment.

**Source:** Project Plans.

1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?				X
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**Discussion:** Although the subject parcel is not located within the Highway 1 State Scenic Corridor. Portions of the access road/trail being repaired are located within the County scenic corridor, however, no vertical structure is proposed. The repairs are proposed at ground level for the access road and the construction is expected to occur for a short duration of time.

**Source:** San Mateo County Geographic Information System.

1.f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?				X
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**Discussion:** The north east portion of the parcel is within a Design Review District; however, the use does not conflict with the General Plan or Zoning Ordinance upon approval of a Use Permit.

**Source:** Project Location; San Mateo County Zoning Map.

1.g. Visually intrude into an area having natural scenic qualities?			X	
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**Discussion:** The project site is designated as Open Space under the County’s General Plan. Both sites are located at Peak Mountain adjacent to existing trails. Grading for the road improvements will be the minimal necessary to provide emergency vehicle access and will also improve the existing North Peak Access Road Trail. Only minor vegetation removal and some tree trimming, to provide vertical clearance for construction vehicles, are necessary to improve the road/trail. No tree removal is proposed. The AT&T facility is being legalized which includes existing antennas mounted on the existing wood tower and two ground level equipment sheds. The increase in visible intensity for legalizing the AT&T facility is minor as the facility is clustered with other carriers approved on site. Also, only minor changes are expected from the AT&T facility, to comply with building code. Additionally, the facility is clustered and blends with similar equipment in the same location.

**Source:** Project Plans, Project Location, San Mateo County Regulations.

**2. AGRICULTURAL AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	

**Discussion:** The Metro PCS facility is located outside the Coastal Zone, a portion of the existing hiking trail/access road and location of both facilities are identified as “Other Lands” on the California Important Farmland Finder (California Farmlands of Statewide Importance map). This designation includes Low Density Rural Developments, brush, timber, wetlands, riparian areas not suitable for livestock grazing, confined livestock, poultry, aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. The non-coastal portion of the project area is currently used for park and wireless telecommunications facilities uses and not for agricultural purposes. There is no prime soil located on the project parcel where the cellular facilities are located. However, the first 1,170 feet of the existing road from Highway 1 inland lies on top of Class III prime soils. Resurfacing the road to repair eroded sections may disturb these soils. Repair work will occur in the footprint of

the existing road and the proposed vehicle turnouts are located outside of areas identified to contain prime soils. Repair work for the section of the existing road that lies upon prime soils will not further convert or degrade these soils as the road is not being expanded nor is soil being removed from the site. The AT&T facility is located within the Coastal Zone; thus, this question is not applicable to this site.

**Source:** California Farmlands of Statewide Importance Map, San Mateo Geographic Information System, California Department of Conservation Important Farmland Finder Map.

2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?

X

**Discussion:** The Resource Management zoning district is not a primary agricultural use designation, though it does permit agricultural uses. Wireless facilities are also allowed under this zoning designation. The parcel is not encumbered by an Open Space Easement or a Williamson Act Contract. Agricultural uses are not present on the parcel. Portion of the access road/trail is located on Planned Agricultural District zoned property. Proposed road/trail repair will have minimal impacts to the area as, minimal additional land will be used to accommodate the fire turnouts for public safety purposes and the road/trail is not being widened any more than necessary.

**Source:** Accela Permit System, Assessor's Parcel Map.

2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?

X

**Discussion:** The project parcel is not designated as Farmland. However, areas of the access road are considered Forest land which is defined as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (PRC12220(g)). Based on staff's review of site photos, although the site may support more than 10 percent tree cover, the project does not propose any significant changes to the existing facilities. Regrading of the existing dirt access road to repair severely eroded areas and install fire turnouts as required by County Fire Protection District, may result in minimal conversion of forestland to non-forest use due to the proposed five fire turnouts areas (approximately 960 sq. ft.) required to be installed. Also, the applicant notes trimming of vegetation may occur only as necessary to allow construction vehicles adequate vertical clearance to access the road to make necessary repairs.

**Source:** California Farmlands of Statewide Importance Map, Project Location.

2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?

X

**Discussion:** The AT&T facility is located in the Coastal Zone. The Natural Resources Conservation Service (NRCS) Web Soil Survey has identified the Land Capability Class rating as Classes 6 and 7,

which include soils with severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat. The project parcel does not include any farm land or agricultural land. Additionally, portions of road repairs will occur in the Coastal Zone. The minor loss of agricultural land or soil capability due to the proposed five fire turnouts will be minimal and less than significant. The project parcel is does not include any farm land or agricultural land.

**Source:** Natural Resources Conservation Service (NRCS) Web Soil Survey.

2.e. Result in damage to soil capability or loss of agricultural land?			X	
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**Discussion:** See discussion under 2.d.

**Source:** Zoning Maps, Natural Resources Conservation Service Web Soil Survey, San Mateo County General Plan Productive Soil Resources with Agricultural Capability Map.

2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?			X	
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*Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.*

**Discussion:** See discussion under 2.c. above. Additionally, the parcel is not zoned Timberland Production. Though timber harvesting is an allowed use in these zoning districts, subject to a County Fire issued Timber Harvesting Permit, the use of the parcel is and has been for non-timber purposes such as public recreation and unmanned cellular facilities.

**Source:** San Mateo County Zoning Maps.

**3. AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?		X		

**Discussion:** The project involves the repair of a severely eroded dirt road that serves as a hiking trail and also as access to the AT&T facility, to be legalized, and an existing Metro PCS facility. The Bay Area 2017 Clean Air Plan (CAP), developed by the Bay Area Air Quality Management District

(BAAQMD), is the applicable air quality plan for San Mateo County. The CAP was created to improve Bay Area air quality and to protect public health and climate.

The proposed project would not conflict with or obstruct the implementation of the BAAQMD's 2017 CAP. The project and its operation involve minimal hydrocarbon (carbon monoxide: CO<sub>2</sub>) air emissions, whose source would be exhaust from vehicle trips (e.g., construction vehicles and personal cars of construction workers), whose primary fuel source is gasoline. However, any such earthwork-related emissions would be temporary and localized and would not conflict with or obstruct the Bay Area Air Quality Plan.

The BAAQMD has established thresholds of significance for construction emissions and operational emissions. As defined in the BAAQMD's 2017 CEQA Guidelines, the BAAQMD does not require quantification of construction emissions due to the number of variables that can impact the calculation of construction emissions. Instead, the BAAQMD emphasizes implementation of all feasible construction measures to minimize emissions from construction activities. The BAAQMD provides a list of construction-related control measures that they have determined, when fully implemented, would significantly reduce construction-related air emissions to a less than significant level. These control measures have been included in Mitigation Measure 1 below:

**Mitigation Measure 1:**

The applicant shall submit a plan to the Planning and Building Department prior to the commencement of work that at a minimum includes applicable "Basic Construction Mitigation Measures" as listed in Table 8-2 of the BAAQMD CEQA Guidelines (May 2017). These measures shall be implemented prior to beginning any project related work and shall be maintained for the duration of the project activities:

- a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- d. All vehicle speeds on unpaved roads shall be limited to 15 mph.
- e. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building ads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- f. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- g. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- h. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance.

Also, see the discussion to Question 7.1. (Climate Change: Greenhouse Gas Emissions), relative to the project's compliance with the County Energy Efficiency Climate Action Plan.

<b>Source:</b> BAAQMD 2017 Clean Air Plan, Project Plans.				
3.b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?		X		
<p><b>Discussion:</b> The San Francisco Bay Area Air Basin is a State designated non-attainment area for Ozone, Particulate Matter (PM10), and Fine Particulate Matter (PM2.5). Therefore, any increase in these criteria pollutants would be significant. A temporary increase in the project area of particulate matter is anticipated during construction since these PM-2.5 particles are a typical vehicle emission. Therefore, any increase in these criteria pollutants would be significant. The temporary nature of the proposed construction and California Air Resources Board vehicle regulations (to reduce air pollution e.g., limits on idling) will reduce the potential effects to a less than significant impact. Implementation of Mitigation Measure 1 will minimize increases in non-attainment criteria pollutants generated from project construction to a less than significant level.</p> <p><b>Source:</b> BAAQMD CEQA Guidelines, May 2017; Project Plans.</p>				
3.c. Expose sensitive receptors to substantial pollutant concentrations, as defined by the Bay Area Air Quality Management District?		X		
<p><b>Discussion:</b> Sensitive receptors are facilities or land uses such as schools, hospitals, or residential areas where people live, play, convalesce, or a place where sensitive individuals spend significant amounts of time. Sensitive individuals, such as children and the elderly, are those most susceptible to poor air quality.</p> <p>The project parcel is located in a rural non-developed area south of San Pedro County Valley park and east of McNee Ranch State Park. Though the parcel is not located near sensitive receptors, the trail may be used by such individuals. Any pollutant emissions generated from the proposed project will primarily be temporary in nature and associated with earthwork to improve the access road/trail. Work on the access road/trail will likely close portions of the trail temporarily, however, other areas of the trail may be in use by sensitive receptors. As such Mitigation Measure 1 is recommended to minimize potentially significant pollutant exposure to potential nearby sensitive receptors to a less than significant levels.</p> <p><b>Source:</b> Project Plans, Project Location.</p>				
3.d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?		X		
<p><b>Discussion:</b> Once the grading repair work is complete, the project will not result in adverse emissions. The project has the potential to generate emissions during construction such as noise and odor. However, any such odors will be temporary and are expected to be minimal. Mitigation Measure 2 is recommended to reduce noise emissions related to the grading repair work to a less than significant level.</p> <p><b>Mitigation Measure 2:</b> Noise sources associated with demolition, construction, repair, remodeling or grading of any real property shall be limited to the hours from 7:00 am. To 6:00 pm., weekdays</p>				

and 9:00 a.m. to 5:00 p.m. Saturdays. Said activities are prohibited on Sundays, Thanksgiving, and Christmas (San Mateo Ordinance Code Section 4.88.360).

**Source:** Project Plans.

**4. BIOLOGICAL RESOURCES.** Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
4.a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?		X		

**Discussion:** A biologist report (Attachment A) conducted by Helix Environmental Planning, Inc. (HELIX) dated September 8, 2018 and an updated memo (Attachment B) dated January 13, 2020 by the United States Department of Interior, Fish and Wildlife Service were prepared.

The site was surveyed on September 8, 2018 by biologist Kyle Workman and reassessed on January 13, 2020 by biologists Leif Goude and Ryan Olah. Helix biologists reviewed literature regarding sensitive plant and wildlife species potentially occurring on the parcel and the access/hiking road and immediate vicinity. Based on site conditions at the time, the report assessed the sensitive resources found on site and an update was provided in January 2020 on the current potential for special status species to occur within the project area. According to the reports, the project may affect but is not likely to adversely affect the federally threatened California red-legged frog and its designated critical habitat, the federally endangered San Francisco garter snake, the federally endangered Mission Blue butterfly or the federally endangered San Bruno Elfin butterfly in accordance with the requirements of the Endangered Species Act of 1973, as amended. Critical habitat has not been designated for the San Francisco garter snake, the Mission Blue butterfly or the San Bruno Elfin butterfly.

The Mission Blue butterfly is known to occur on the ridges east of the project area. Botanical surveys of the project area found no host plants in the project footprint for this species. The San Bruno Elfin butterfly has been documented approximately two miles north of the project location, however the survey found no host plants for this species. The project parcel is more than one mile from any pond or reservoir that are potentially capable of supporting breeding or foraging for the San Francisco garter snake. The project area is within a designated California red legged frog critical habitat but does not contain the elements of their critical habitat: aquatic breeding habitat, non-breeding aquatic habitat and upland habitat. It was noted that a juvenile California red legged frog was observed during a survey for another project in 2016 but a follow up survey conducted in May 2016 did not find any California red legged frog within the project area. The juvenile frog was in a puddle that ponded following a late season rain storm the location of which is currently dry. Improvements to the access/trail road with the project area shall be graded during dry conditions.

The following Mitigation Measures are recommended to reduce potential adverse significant impacts to less than significant levels.

**Mitigation Measure 3:** Work shall stop if any listed species are encountered in the project area, the listed species shall be allowed to leave on its own volition.

**Mitigation Measure 4:** A biologist shall be present for all ground-disturbing activities and shall flag any host plants for butterflies to be avoided.

**Mitigation Measure 5:** Vehicles and equipment shall be parked on pavement, existing roads and previously disturbed areas to the maximum extent possible. If construction vehicles need to park on vegetation along the access road/hiking trail, the applicant shall work with the biologist and designate areas for off road parking needs to confirm no plant or species are impacted.

**Mitigation Measure 6:** No work shall be conducted, and all work shall cease when precipitation is forecast to be greater than 0.1 inches.

**Source:** Project Plan, Helix Environmental Planning, Inc., Memo by the United States Department of Interior, Fish and Wildlife Service.

4.b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service or National Marine Fisheries Service?		X		
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**Discussion:** The submitted biologist report did not indicate riparian habitat in the project area but discussed the potential for the California red-legged frog, San Francisco garter snake, the Mission Blue butterfly and the San Bruno Elfin butterfly. See discussion under 4.a.

**Source:** Project Plan, Helix Environmental Planning, Inc., Memo by the United States Department of Interior, Fish and Wildlife Service.

4.c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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**Discussion:** The US Army Corps of Engineers definition of wetland, includes three characteristics that must be demonstrated: wetland vegetation, wetland hydrology, and wetland soils. Neither the Helix or United States Department of Interior, Fish and Wildlife Service biologist reports identify wetlands on the property. The property is approximately 1,800 feet from the nearest wetland as referenced on The National Wetlands Inventory map.

New construction is associated with the proposed grading repair to the severely eroded dirt access road at ground level and also to install five fire turnouts as required by County Fire and the project is not expected to remove, fill or impact any wetland features.

**Source:** Project Plans, Project Location, Helix (dated September 8, 2018) and United States Department of Interior, Fish and Wildlife Service (dated January 13, 2020) biologist reports, National Wetlands Inventory Map.

4.d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		
<p><b>Discussion:</b> The project area is within the dispersal area for red-legged frog. See staff's response and recommended mitigation measures under Question 4.a. Some tree trimming may be required in order to provide adequate vertical clearance for the blade cutting construction vehicles, tree protection shall be installed according to the requirements of the County's Tree Ordinances.</p> <p><b>Source:</b> Helix (dated September 8, 2018) and United States Department of Interior, Fish and Wildlife Service (dated January 13, 2020) Biologist Reports.</p>				
4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?				X
<p><b>Discussion:</b> The San Mateo County Significant Tree Ordinance defines a significant tree as any live woody plant with a single stem or trunk with a diameter of 12 inches or more measured at 4.5 feet above grade. The project does not include tree removal, however, some trees located near the road/trail may need to be trimmed in order to provide vertical construction vehicle clearance. Tree protection shall be shown on the construction plans prior to building permit issuance. The tree protection shall be directed by a certified arborist. RM District Development Review Criteria regulates tree removal for trees greater than 55-inch circumference measured at 4.5 feet from the ground.</p> <p><b>Source:</b> Project Plans; San Mateo County Significant Tree Ordinance.</p>				
4.f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or state habitat conservation plan?				X
<p><b>Discussion:</b> The hiking trail/access road repair will be located on property owned by the State as well as the North Coast County Water District. No impacts/conflicts are expected with the proposed project area. There are no known adopted conservation plans where the work is proposed.</p> <p><b>Source:</b> California Department of Fish and Wildlife, Habitat Conservation Planning, Natural Conservation Community Plan, Data Basin, Habitat Conservation Plan, California, Project Location.</p>				
4.g. Be located inside or within 200 feet of a marine or wildlife reserve?				X
<p><b>Discussion:</b> The project parcel and hiking trail is not located inside or within 200 feet of a marine or wildlife reserve.</p> <p><b>Source:</b> U.S. Fish and Wildlife Services, National Refuge System Locator, Project Location.</p>				

4.h. Result in loss of oak woodlands or other non-timber woodlands?				X
<p><b>Discussion:</b> The project area does have existing trees however no trees are proposed for removal, only tree trimming is expected.</p> <p><b>Source:</b> Project Plans.</p>				

<b>5. CULTURAL RESOURCES.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?		X		
<p><b>Discussion:</b> The project area consists of rural, undeveloped open space land with exception of the existing cellular facilities and other various equipment located on the same tower as the AT&amp;T facilities proposed to be legalized. The Metro PCS cellular facility has existed since 1960 when Metro PCS (PLN 2006-00075 was initially approved) as indicated in the San Mateo County permit tracking system. Thus, the dirt access road has existed for the same amount of time. The only proposed disturbance is necessary repair to the existing access road and installing five fire truck turnouts.</p> <p>Staff previously sent a referral to Sonoma State May 1993 and received comment in June 1993 that there is a low possibility of archeological sites in the project area and that further study was not required. Most recently a referral was sent to the Native American Heritage Commission (NAHC) for the subject project which confirmed a positive likelihood of Sacred Land Files check (SLF), recommending further study. Staff sent letters to all the NAHC identified tribes and is awaiting comment.</p> <p>There is low expectation that the road repair and new fire turnouts would impact any unknown historical resources as a majority of the grading activities will occur in previously graded and disturbed areas with minimal new ground disturbance.</p> <p>The project is not listed on the National Park Service Register of Historic Places and the project was not referred to the California Historical Resources Northwest Information Center of Sonoma State University given the outcome of staff's previous 1993 referral and since the property had been developed with three existing tower facilities. Ground disturbance for road/trail repair is proposed in order to provide safe vehicle access for the carriers and emergency vehicles. Should any articles of historical evidence be found during the grading activities, construction will be required to halt until an archaeological consultant can visit the site. The following mitigation measures will ensure project impacts, should cultural resources be found, are reduced to less than significant impacts.</p> <p><b>Mitigation Measure 7:</b> In the event that cultural, paleontological, or archaeological resources are encountered during site grading or other site work, such work shall immediately be halted in the area of discovery and the project sponsor shall immediately notify the Community Development Director of the discovery. The applicant shall be required to retain the services of a qualified archaeologist or applicable profession for the purpose of recording, protecting, or curating the discovery as appropriate. The cost of the qualified archaeologist, or applicable professional, and of any</p>				

recording, protecting, or curating shall be borne solely by the project sponsor. The archaeologist, or applicable professional, shall be required to submit to the Community Development Director for review and approval a report of the findings and methods of curation or protection of the resources. In addition, an archaeological (or applicable professional), report meeting the Secretary of the Interior's Standards detailing the findings of the monitoring will be submitted to the Northwest Information Center after monitoring has ceased. No further grading or site work within the area of discovery shall be allowed until the preceding has occurred.

**Mitigation Measure 8:** If a newly discovered resource is, or is suspected to be, Native American in origin, the resource shall be treated as a significant Tribal Cultural Resource, pursuant to Public Resources Code 21074, until the County has determined otherwise with the consultation of a qualified archaeologist and local tribal representative.

**Mitigation Measure 9:** In the event of discovery or recognition of any human remains during project construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The applicant shall then immediately notify the County Coroner's Office and possibly the State Native American Heritage Commission to seek recommendations from a Most Likely Descendant (Tribal Contact) before any further action at the location of the find can proceed. All contractors and sub-contractors shall be made aware of these requirements and shall adhere to all applicable laws including State Cultural Preservation laws. Disposition of Native American remains shall comply with CEQA Guidelines Section 15064.5(e).

**Source:** Project Location; Project Plans.

5.b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?		X		
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**Discussion:** The project area consists of rural, undeveloped land open space land with exception of two cellular facilities, Metro PCS and AT&T, who are seeking legalization to collocate with existing equipment by other owners. The AT&T cellular facility antennas are mounted on a wood structure with other existing equipment. The other carriers/owners are unknown but also leasing space from American Towers Corporation, the land owner. The other carriers have not been identified. The subject permit will only legalize the AT&T facility equipment, the other equipment on this tower, if not legal, will require separate Use Permit approvals. The various cellular facilities and equipment have existed on site since approximately the 1960's as indicated in the San Mateo County permit tracking system. The dirt access road has also existed for the same amount of time. The only proposed disturbance is repair of the existing access road and installing five fire turnout areas. There is low probability that legalizing the AT&T facility and the road repair and new fire turnouts would impact any unknown archaeological resources because the access road/hiking trail is already developed land and the proposed fire turnout areas would only generate minimal new disturbance. Mitigation Measure 7 is recommended to reduce any potential adverse significant impacts to less than significant levels.

**Source:** Project Plans.

5.c. Disturb any human remains, including those interred outside of formal cemeteries?		X		
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**Discussion:** It's not expected that there are any human remains in the project area that would be disturbed. Approximately 2,065 cubic yards of grading remediation is proposed for the dirt access

road repair including the proposed five fire turnouts. Mitigation Measure 9 is recommended to reduce any potential adverse significant impacts to less than significant levels.

**Source:** California Public Resources Code; Project Location.

6. ENERGY. Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
6.a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
<p><b>Discussion:</b> The project will use on-site electricity or energy as the project site is considered rural and unimproved with such resources. Energy consumption associated with the grading repair project would be limited to minimal construction equipment (i.e., construction vehicles) which would be limited and temporary for the implementation of the project.</p> <p><u>Construction</u></p> <p>The project would require consumption of non-renewable energy resources primarily in the form of fossil fuel (e.g., fuel oil, natural gas, and gasoline) for construction equipment and automobile for general site maintenance of the cellular facilities. Transportation energy use during construction would come from the construction equipment, haul trucks and construction employees' vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction of the grading work. Use of energy resources is not expected from the cellular facilities since no changes are proposed. Most construction equipment during grading will likely be diesel powered and electricity powered equipment.</p> <p><u>Operation</u></p> <p>During operations, energy consumption would be associated with vehicle maintenance trips. The project is two existing cellular facility sites served by existing road infrastructure. Pacific Gas and Electric (PG&amp;E) provides electricity to the project area. The project will result in continued use of electricity that has been already been in operation and no new increases in level of service are expected. Impacts are less than significant, and no mitigation is required.</p> <p><b>Source:</b> Project Plans.</p>				
6.b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.			X	
<p><b>Discussion:</b> The project includes legalizing structural development of the AT&amp;T facility, however legalizing the facility is not expected to cause demand for energy resources that would conflict or obstruct a state or local plan for renewable energy or energy efficiency.</p> <p><b>Source:</b> Project Plans.</p>				

7. <b>GEOLOGY AND SOILS.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7.a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?  <i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i>			X	
<p><b>Discussion:</b> The project site is located between two faults, the San Andreas Fault located approximately 4 miles to the east and fault along Pillar Point Bluff in the Princeton area, approximately three miles southwest of the project area. However, the project sites are not located in the mapped Alquist-Priolo Earthquake Fault Zone area where a fault rupture is likely to occur. The project will involve a blade vehicle and hauling truck for the road improvements. The project is not expected to cause rupture of earthquake faults. The San Mateo County Geographic Information System indicated potential landslide area around the project site but no potential landslide on the subject parcel itself. The project has been reviewed by the County's Geotechnical staff and since there is no record of geologic hazards in the area, a geotechnical report will be required and reviewed at the building permit stage.</p> <p><b>Source:</b> Project Plans, San Mateo County Geographic Information System.</p>				
ii. Strong seismic ground shaking?			X	
<p><b>Discussion:</b> The project location's is 2-4 miles from either San Andreas fault and Pillar Point Bluff fault. The AT&amp;T cellular towers and two associated equipment sheds are required to meet State building code standards for earthquakes. Adherence to applicable building codes will reduce the likelihood of potential substantial adverse effects, including loss, injury, or death resulting from strong seismic ground shaking. No further mitigation is necessary.</p> <p><b>Source:</b> San Mateo County Geographic Information System, Project Plans.</p>				
iii. Seismic-related ground failure, including liquefaction and differential settling?			X	

**Discussion:** See response to 7.a.ii. Thus, the project would not be significantly affected by liquefaction or differential settling.

**Source:** San Mateo County Geographic Information System, Project Plans

iv. Landslides?			X	
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**Discussion:** See response to 7.a.ii. The San Mateo County Landslide Susceptibility Map notes the project area as category I and II, areas of low to moderate landslide susceptibility. The project consists of renewal of an existing Metro PCS cellular facility and to legalize an existing AT&T cellular facility with no ground disturbance to the facilities. The dirt access road requires significant repair that involves surface blade cutting to repair the severe erosion. The amount of grading proposed is due to the length of the road and not a depth for digging into the ground. The road repair is not expected to cause the occurrence of landslide and will be monitored by a soils engineer.

**Source:** San Mateo County Geographic Information System, Project Plans, Landslide Susceptibility Map San Mateo County.

v. Coastal cliff/bluff instability or erosion?  <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i>				X
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**Discussion:** The project site is not located on a coastal cliff or bluff.

**Source:** Project Location.

7.b. Result in substantial soil erosion or the loss of topsoil?			X	
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**Discussion:** Without the proposed road repair, the access road is subject to continued substantial soil erosion and the site is not easily accessible, thus the project will repair the eroded dirt road/trail and install adequate measures to properly manage future erosion. At the building permit stage, the applicant shall submit an erosion control plan for review and approval by the Planning Department. The erosion control measures shall be implemented for the duration of the grading project to minimize erosion during the work. If the building permit is issued during the Winter Grading Moratorium season, the applicant shall apply for a winter grading permit which requires approval from Planning Department staff. The following mitigation measure during construction will ensure erosion and sediment runoff is kept to a minimum.

**Mitigation Measure 10:** Prior to the issuance of the building permit for the property, the applicant shall submit to the Planning Department for review and approval an erosion and drainage control plan that shows how the transport and discharge of soil and pollutants from and within the project site shall be minimized. The plan shall be designed to minimize potential sources of sediment, control the amount of runoff and its ability to carry sediment by diverting incoming flows and impeding internally generated flows, and retain sediment that is picked up on the project site through the use of sediment-capturing devices. The plan shall also limit application, generation, and migration of toxic substances, ensure the proper storage and disposal of toxic materials, and apply nutrients at rates necessary to establish and maintain vegetation without causing significant nutrient

runoff to surface waters. Said plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including:

- a. Sequence construction to install sediment-capturing devices first, followed by runoff control measures and runoff conveyances. No construction activities shall begin until after all proposed measures are in place.
- b. Minimize the area of bare soil exposed at one time (phased grading).
- c. Clear only areas essential for construction.
- d. Within five (5) days of clearing or inactivity in construction, stabilize bare soils through either non-vegetative best management practices (BMPs), such as mulching, or vegetative erosion control methods, such as seeding. Vegetative erosion control shall be established within two (2) weeks of seeding/planting.
- e. Construction entrances shall be stabilized immediately after grading and frequently maintained to prevent erosion and to control dust.
- f. Control wind-born dust through the installation of wind barriers such as hay bales and/or sprinkling.
- g. Soil and/or other construction-related material stockpiled on-site shall be placed a minimum of 200 feet from all wetlands and drain courses. Stockpiled soils shall be covered with tarps at all times of the year.
- h. Intercept runoff above disturbed slopes and convey it to a permanent channel or storm drains by using earth dikes, perimeter dikes or swales, or diversions. Use check dams where appropriate.
- i. Provide protection for runoff conveyance outlets by reducing flow velocity and dissipating flow energy.
- j. Use silt fence and/or vegetated filter strips to trap sediment contained in sheet flow. The maximum drainage area to the fence should be 0.5 acres or less per 100 feet of fence. Silt fences shall be inspected regularly, and sediment removed when it reaches 1/3 the fence height. Vegetated filter strips should have relatively flat slopes and be vegetated with erosion-resistant species.
- k. Throughout the construction period, the applicant shall conduct regular inspections of the condition and operational status of all structural BMPs required by the approved erosion control plan.
- l. No erosion or sediment control measures will be placed in vegetated areas.
- m. Environmentally sensitive areas shall be delineated and protected to prevent construction impacts.
- n. Control of fuels and other hazardous materials, spills, and litter during construction.
- o. Preserve existing vegetation whenever feasible.

**Source:** Project Plans.

7.c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?			X	
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**Discussion:** The project is not expected to generate on or off-site geotechnical hazards as the project consists of low intensity grading of a 2,000-foot-long dirt access road to repair severely eroded areas. Surface soil disturbance is proposed to repair the eroded areas, to install adequate long-term erosion control measures that will properly divert water during the wet season and to install five fire turnout areas as required by County Fire Protection District.

**Source:** Project Plans.

7.d. Be located on expansive soil, as defined in Table 18-1-B of Uniform Building Code, creating substantial direct or indirect risks to life or property?

X

**Discussion:** The County's Geotechnical Hazards Synthesis Map characterizes the project area's geological material to be hard bedrock and generally non-expansive. Permeability is low and few landslides, the fill is generally fine grain material. Slope stability is fair to good and earthquake stability is good.

**Source:** County Geotechnical Hazards Synthesis Map, Project Plans.

7.e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

X

**Discussion:** The project does not involve the use of a septic tank or alternative wastewater system.

**Source:** Project Plans.

7.f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

X

**Discussion:** Based on the project parcel's existing surrounding land uses, it is not likely that the project parcel would host any paleontological resource or site or unique feature. The project consists of legalizing an AT&T cellular facility, renewal of an existing permitted Metro PCS facility and erosion repair at surface level along a 3.5-mile hiking trail that is moderately sloped undeveloped hillside. Surface ground disturbance and exposure is involved in specific areas where erosion is severe. There is a low probability that the project would destroy or cause impact to a unique paleontological resource or unique geologic features. Mitigation Measures 5, 6 and 7 will ensure that if any resources are encountered potential impacts will be reduce to less than significant levels.

**Source:** Project Plans, Project Location.

**8. CLIMATE CHANGE.** Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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8.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?			X	
<p><b>Discussion:</b> Greenhouse Gas Emissions (GHG) include hydrocarbon (carbon monoxide; CO2) air emissions from vehicles and machines that are fueled by gasoline. Project-related vehicle trips (e.g., construction vehicles, personal vehicles for construction workers, maintenance workers) and machinery associated with the proposed grading to repair the eroded dirt access road will result in temporary generation of GHG emissions along the existing dirt access road to the project site. Assuming construction vehicles are based in and travelling from urban areas, the potential project GHG emission levels from construction would be considered minimal and limited to a short duration of time to complete the road repair only). Although the project scope is not likely to generate significant amounts of greenhouse gases, Mitigation Measure 1 will ensure that any impacts are less than significant.</p> <p><b>Source:</b> Project Plans.</p>				
8.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
<p><b>Discussion:</b> The San Mateo County Energy Efficiency Climate Action Plan (EECAP) identifies implementation measures for the reduction of GHG emissions resulting from development consistent with state legislation, including construction idling. The majority of GHG emissions from the project are expected to occur during the construction phase, primarily from the vehicle exhaust. GHG emission from the road repair will be associated with vehicle trips, will not conflict with the EECAP, and are expected to be less than significant upon implementation of Mitigation Measure 1:</p> <p><b>Source:</b> Project Plans, 2013 San Mateo County Energy Efficiency Climate Action Plan.</p>				
8.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?			X	
<p><b>Discussion:</b> As defined by Public Resources Code Section 12220(g), forestland is land that can support 10 percent native tree of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The property consists of northern coastal scrub and common species include coyote brush, California sagebrush, poison oak, California coffeeberry, manzanita, conifers, eucalyptus trees, Monterey pine, Monterey Cypress, and Ponderosa pine. Although the access road has trees in the area, no tree removal is proposed.</p> <p><b>Source:</b> Project Plan, Biological Resources Impact Analysis prepared by HELIX.</p>				
8.d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to				X

accelerated coastal cliff/bluff erosion due to rising sea levels?				
<p><b>Discussion:</b> The project is not located on or near a coastal cliff or bluff where accelerated erosion due to sea level rise would pose a risk.</p> <p><b>Source:</b> Project Location.</p>				
8.e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
<p><b>Discussion:</b> The project is not located in an area where sea level rise is a concern.</p> <p><b>Source:</b> Project Location.</p>				
8.f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
<p><b>Discussion:</b> The project site is not located in an anticipated 100-year flood hazard area as mapped by the Federal Emergency Management Agency (FEMA). The project site is located in FEMA Flood Zone X, which is considered a minimal flood hazard (Panel No. 06081C0136E, effective October 16, 2012). FEMA Flood Zone X areas have a 0.2 percent annual chance of flooding, with areas with one (1) percent annual chance of flooding with average depths of less than 1-foot. The project proposes renewal of an existing Metro PCS facility and to legalize an AT&amp;T cellular facility with associated ground level equipment housed in two detached sheds. There is no project impact.</p> <p><b>Source:</b> Project Location, County GIS Maps, Federal Emergency Management Agency Flood Insurance Rate Map 06081C0136E, effective October 16, 2012.</p>				
8.g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p><b>Discussion:</b> The project does not propose any structures within an anticipated 100-year flood hazard area.</p> <p><b>Source:</b> Project Location, Project Plan, Federal Emergency Management Agency Flood Insurance Rate Map 06081C0136E, effective October 16, 2012.</p>				

<b>9. HAZARDS AND HAZARDOUS MATERIALS.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous				X

materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?				
<p><b>Discussion</b> The construction does not involve the use, transport or disposal of hazardous materials.  <b>Source:</b> Project Plans.</p>				
9.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
<p><b>Discussion:</b> See response to 9.a above. The project involves the repair of a severely eroded dirt access road. The site is not a known hazardous material site, per the California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese List).  <b>Source:</b> California Department of Toxic Substances Control, Hazardous Waste and Substances Site List.</p>				
9.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		X		
<p><b>Discussion:</b> There are no schools located within the vicinity of the project. Emissions from the wireless telecommunications facilities is compliant with the Federal Communications Commission requirements as mitigated in the radio emissions report prepared by Lawrence Behr Associates Inc. (LBA) for the Metro PCS facility and the emissions report prepared by Site Safe for the AT&amp;T facility. The LBA report notes the General Population Maximum Permissible Exposure (MPE) at 20 ft. is 0.17%, is in compliance and no additional mitigation measures are required. The Site Safe EMF report states the maximum RFE at ground level is less than 1% of the General Public Limit. Further, the site will be in compliance with a yellow caution 2 sign posted at the site access location and an Information sign posted at gate locations #1 and #2. Mitigation Measure 11 includes the posted signs for AT&amp;T for compliance purposes.  <b>Mitigation Measure 11:</b> The applicant shall post two yellow caution signs at the site access location and one Information sign posted at gate locations #1 and #2.  <b>Source:</b> Project plans. Lawrence Behr Associates Inc. Radio Frequency Report (Metro PCS), Site Safe, HELIX, Radio Frequency Report, (AT&amp;T facility).</p>				
9.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
<p><b>Discussion:</b> The project site is not listed on a hazardous materials site list.</p>				

<b>Source:</b> Project Location; California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese List).					
9.e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?				X
<b>Discussion:</b> The project is not located within an airport land use plan or within 2 miles of a public airport. <b>Source:</b> Project Location.					
9.f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
<b>Discussion:</b> The project would not impair implementation of, or physically interfere with, an adopted emergency response or evacuation plan. The proposed project is not expected to permanently impede, change the configuration, or close any roadways that could be used for emergency purposes. The existing access road is not readily usable due to severe erosion. Repair of the dirt road will improve access to maintenance vehicles and emergency vehicles. <b>Source:</b> Project Location, Project Plans.					
9.g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
<b>Discussion:</b> Although the project entails low-intensity work to complete, the project site is located in a Very High Fire Hazard Severity Zone, State Responsibility Area. According to the County's Grading and Land Clearing regulations, Section 9296.5 (Fire Safety), any equipment must meet spark arrester and firefighting tool requirements as specified in the California Public Resources Code. Upon staff's site inspection, there are a collection of three-foot-tall propane tanks clustered near the AT&T cellular facility. The applicant shall contact Environmental Health Services and obtain a Hazardous Business Materials plan. This will be included as a condition of approval for the project. Conditions of approval for any entitlement permit issued by the County for this project shall reflect this County regulation requirement. The San Mateo County Fire Department has conditioned the project to have portable fire extinguishers at the cellular facilities and installation of a Knox Box, Knox Key Switch, or Knox Padlock on the gate at the Cabrillo Highway/Highway 1 gate entrance to allow rapid response of emergency vehicles onto the property in case of a fire or medical emergency. <b>Source:</b> Project Plans, San Mateo County Building Regulations for Grading and Land Clearing, San Mateo County Fire Department Review.					

9.h.	Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
<p><b>Discussion:</b> The project site is not located within a 100-year flood hazard area.</p> <p><b>Source:</b> Federal Emergency Management Agency, Flood Insurance Rate Map, Community Panel 06081C0136E, effective October 16, 2012.</p>					
9.i.	Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p><b>Discussion:</b> The project parcel is not located within a 100-year flood hazard area. Although the AT&amp;T cellular facility is proposed to be legalized, the facility is elevated and is not expected to impede or redirect flood flows, were the structure located within a 100-year flood hazard area.</p> <p><b>Source:</b> Federal Emergency Management Agency, Flood Insurance Rate Map, Community Panel 06081C0136E, effective October 16, 2012.</p>					
9.j.	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
<p><b>Discussion:</b> The project site is not within a dam failure inundation area per the San Mateo County General Plan Hazards Map.</p> <p><b>Source:</b> Project Location; San Mateo County General Plan, Hazards Map.</p>					
9.k.	Inundation by seiche, tsunami, or mudflow?				X
<p><b>Discussion:</b> According to the San Mateo County General Plan Hazards Map, the project site is not located in a tsunami or seiche inundation area or in a high landslide area.</p> <p><b>Source:</b> San Mateo County General Plan, Hazards Map.</p>					

<b>10. HYDROLOGY AND WATER QUALITY.</b> Would the project:					
		<b><i>Potentially Significant Impacts</i></b>	<b><i>Significant Unless Mitigated</i></b>	<b><i>Less Than Significant Impact</i></b>	<b><i>No Impact</i></b>
10.a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other			X	

<p>typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash))?</p>				
<p><b>Discussion:</b> No watercourses are identified in the project area; however, natural drainage channels may be present. The project involves legalizing an existing AT&amp;T cellular facility, renewal of an existing legal Metro PCS cellular facility and grading required to repair the dirt hiking trail to make it usable. The trail/road work has the potential to generate polluted stormwater erosion during construction during the wet season (October 1 -May 1). The construction of the project is required to comply with the County’s Drainage Policy requiring post construction runoff. The plans indicate that where excessive erosion exists, water bars will be installed which will divert water to the edge of the access road to a controlled drainage area.</p> <p><b>Source:</b> Project Plans.</p>				
<p>10.b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</p>				<p>X</p>
<p><b>Discussion:</b> The project would not decrease groundwater supplies or interfere with groundwater recharge and does not propose a new water source as the project entails legalizing an existing AT&amp;T cellular facility, renewal of an existing Metro PCS facility, scraping of the dirt road to repair eroded areas and to install five new fire truck turnouts areas.</p> <p><b>Source:</b> Project Plans.</p>				
<p>10.c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:</p>				
<p>i. Result in substantial erosion or siltation on- or off-site;</p>		<p>X</p>		
<p><b>Discussion:</b> Repair of the eroded dirt access road has the potential for dirt to migrate during heavy rains events conditions. The water bars will help to divert rain fall. The project was reviewed by the County’s drainage staff and Department of Public Works for compliance.</p> <p>The construction of the project is required to comply with the County’s Drainage Policy requiring post construction runoff. Mitigation Measure 10 will help minimize erosion.</p> <p><b>Source:</b> Project Plans, County Drainage Review Section.</p>				
<p>ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;</p>			<p>X</p>	

**Discussion:** See staff's response to 10.a.  
**Source:** Project Plans.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or		X		
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**Discussion:** The project is located in a rural area where no stormwater drainage systems are present. Legalizing the AT&T facility creates additional impervious surface and the hiking trail will create polluted runoff if left unmitigated.

The construction of the project is required to comply with the County's Drainage Policy requiring post construction runoff. The plans indicate that where excessive erosion exists, water bars will be installed which will divert water to the edge of the access road to a controlled drainage area. Mitigation Measure 12 will ensure erosion and sediment runoff is kept to a minimum, to reduce erosion as a result of altered drainage patterns:

**Mitigation Measure 12:**

Prior to the issuance of the Building permit, the applicant shall have prepared, by a registered civil engineer, a drainage analysis of the proposed project and submit it to the Department of Planning and Building for review and approval. The drainage analysis shall consist of a written narrative and a plan. The flow of the stormwater onto, over, and off of the dirt road shall be mitigated so that it does not create rills and gullies in the roadway. Recommended measures shall be designed and included in the improvement plans and submitted to the Department of Planning and Building for review and approval. Options for approach to showing that ongoing erosion prevention has been addressed:

- a. Provide plan and profile with drainage calculations at various slopes on the plans. Provide matrix for repair.
- b. Provide inventory of specific locations to be repaired on the plans with matrix for repair. Provide calculations as appropriate, and example details for waterbars, etc.
- c. Set up agreement to review annually for the life of the project. Set aside funds to cover costs or hire engineer to submit reports. Drone fly over is ok.
- d. For slopes greater than 15 percent, the surface needs to be asphalt with no slopes over 20 percent, unless permission is obtained from the fire district to waive this requirement.
- e. Details and typical construction erosion control (EC) measures/stormwater BMPs will be specified on the plans to be implemented as-needed along the roadway. The portion of the roadway within the Areas of Special Biological Significance (ASBS) shall be highlighted and particular care for EC installation will be required in this area.

**Source:** Project Plans.

iv. Impede or redirect flood flows?			X	
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**Discussion:** The project consists of improving an existing dirt access road to repair severe erosion. The erosion repair includes water bars to properly divert water off the road to the sides of the road

and into a controlled and appropriately sized drainage area. No watercourses are present in the project area.

**Source:** Project Plans.

10.d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
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**Discussion:** The project is not located in a flood hazard tsunami, or seiche zone.

**Source:** Federal Emergency Management Agency, Flood Insurance Rate Map, Community Panel 06081C0136E, effective October 16, 2012.

10.e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
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**Discussion:** The project consists of legalizing an AT&T cellular facility and repairs to an existing dirt hiking trail/access road to repair severe erosion. Legalization of the AT&T facility will introduce new impervious surfaces to the area that has not previously been considered by the County. The project includes drainage measures to ensure all impervious surfaces resulting from the project are in compliance with County standards for size and capacity. The project will not affect the implementation of a water quality control plan or sustainable groundwater management plan.

**Source:** Project Plans.

10.f. Significantly degrade surface or ground-water water quality?				X
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**Discussion:** The project consists of improving an existing dirt access road to repair severe erosion. Legalizing the AT&T facility introduces new impervious surfaces to the area and will require review by County drainage staff. The project will not affect the implementation of a water quality control plan or sustainable groundwater management plan.

**Source:** Project Plans.

10.g. Result in increased impervious surfaces and associated increased runoff?		X		
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**Discussion:** The project consists of legalizing an AT&T cellular facility and repairs to an existing severely eroded dirt hiking road to repair erosion. Legalization of the AT&T facility introduces new impervious surface that has never been considered by the County. Though the road improvements include compaction, the access road/trail are already compacted and eroded. The road repair will enable vehicles to safely access the hiking trail and existing and proposed cellular facilities. See also staff's discussion in Section 10.a, and 10.c.iii. for Mitigation Measure 12.

**Source:** Project Plans.

**11. LAND USE AND PLANNING.** Would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Physically divide an established community?				X
<p><b>Discussion:</b> The project does not involve a land division or development that would result in the division of an established community.</p> <p><b>Source:</b> Project Plans, Project Location.</p>				
11.b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X
<p><b>Discussion:</b> The project would not conflict with any applicable land use plan, or regulation adopted for the purposes of avoiding or mitigating an environmental impact.</p> <p><b>Source:</b> Project Plans.</p>				
11.c. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?				X
<p><b>Discussion:</b> The project proposes to renew an existing Metro PCS cellular facility, legalize an existing AT&amp;T cellular facility and repair a severely eroded dirt access road/trail. The site is already developed with other existing cellular facilities. The AT&amp;T cellular facility will continue utilizing existing power connection to public utilities if approved. Improvements to the access road/trail may encourage additional trail users but this would serve existing public recreation facilities and make this area of the trail safer for users.</p> <p><b>Source:</b> Project Plans.</p>				

<b>12. MINERAL RESOURCES.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				X

<b>Discussion:</b> No known mineral resources are mapped.				
<b>Source:</b> California Department of Conservation Mineral Land Classification.				
12.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
<b>Discussion:</b> No mapped mineral resources are identified on the General Plan Mineral Resources map.				
<b>Source:</b> San Mateo County General Plan Mineral Resources Map.				

<b>13. NOISE.</b> Would the project result in:				
	<i><b>Potentially Significant Impacts</b></i>	<i><b>Significant Unless Mitigated</b></i>	<i><b>Less Than Significant Impact</b></i>	<i><b>No Impact</b></i>
13.a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
<b>Discussion:</b> The project will consist of construction vehicles, including a blade cutter to repair the eroded dirt access road. The work is expected to generate minimal and short term increases in ambient noise associated with the road repair work. The short-term noise generated during grading activities will be temporary, where volume and hours are regulated by Section 4.88.360 (Exemptions) of the San Mateo County Ordinance Code for Noise Control. Otherwise the project will not generate any long-term noise impacts to the area.				
<b>Source:</b> Project Plans, County Ordinance Code, Section 4.88.360 (Noise Control).				
13.b. Generation of excessive ground-borne vibration or ground-borne noise levels?			X	
<b>Discussion:</b> The project will consist of construction vehicles, including a blade cutter to repair the eroded dirt access road. The work is expected to generate minimal and short term increases in ground-borne vibration and ambient noise associated with the road repair work. However, such increases will be temporary and localized and the project is not expected to be excessive to require mitigation.				
<b>Source:</b> Project Plans.				
13.c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport				X

or public use airport, exposure to people residing or working in the project area to excessive noise levels?				
<p><b>Discussion:</b> The project is not located within an airport land use plan or within 2 miles of a public airport.</p> <p><b>Source:</b> Project Location.</p>				

<b>14. POPULATION AND HOUSING.</b> Would the project:				
	<i><b>Potentially Significant Impacts</b></i>	<i><b>Significant Unless Mitigated</b></i>	<i><b>Less Than Significant Impact</b></i>	<i><b>No Impact</b></i>
14.a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
<p><b>Discussion:</b> The project would not induce substantial unplanned population growth as the project is limited to renewal of one existing cellular facility, legalizing a second cellular facility and repairing an eroded dirt access road, all of this exists in an undeveloped mountain area.</p> <p><b>Source:</b> Project Plans.</p>				
14.b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
<p><b>Discussion:</b> The project would not displace existing people or housing, as the project is limited to renewal of one existing cellular facility, legalizing a second cellular facility and repairing an eroded dirt access road, all of this exists in an undeveloped area.</p> <p><b>Source:</b> Project Plans.</p>				

<b>15. PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	<i><b>Potentially Significant Impacts</b></i>	<i><b>Significant Unless Mitigated</b></i>	<i><b>Less Than Significant Impact</b></i>	<i><b>No Impact</b></i>

15.a. Fire protection?				X
15.b. Police protection?				X
15.c. Schools?				X
15.d. Parks?				X
15.e. Other public facilities or utilities (e.g., hospitals, or electrical/natural gas supply systems)?				X

**Discussion:** The project would not result in substantial adverse physical impacts requiring new or physical altered government facilities or public services since the project is limited to renewal of one existing cellular facility, legalizing a second cellular facility and repairing an eroded access dirt access road/trail, all of this exists in an undeveloped area. Any increase in use of the property will be minor. The site has been used by cellular facilities since 1960 as noted in the County's Accela permit tracking system. The access road/trail improvements will help to improve emergency response times to and within the immediate project area.

**Source:** Project Plans, Accela Permit Tracking System.

<b>16. RECREATION.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
<p><b>Discussion:</b> The project may increase the use of existing neighborhood or regional parks or other recreational facilities. Once the dirt hiking trail is repaired it will provide proper safe access for the cellular carrier maintenance staff, emergency road vehicles and hikers. The potential project impact on the use of San Pedro Valley County Park or McNee Ranch State Park, or on public trails on Montara Mountain would be less than significant such that significant physical deterioration of any such facility as a result of the project is not expected to occur or accelerate from the repair of the dirt access road. Therefore, the project poses a less than significant impact. If the road is not repaired, the physical deterioration of the trail/access road would continue.</p> <p><b>Source:</b> Project Plans.</p>				
16.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have				

an adverse physical effect on the environment?				
<p><b>Discussion:</b> The project proposes to improve an existing access trail/dirt road that leads to a public park, including minor expansion of the access trail/dirt road. The expansion involves five new fire turnouts as required by County Fire Protection District. As provided throughout this report, any environmental impacts from the project will be mitigated to a less than significant level. No additional mitigation is needed.</p> <p><b>Source:</b> Project Plans.</p>				

<b>17. TRANSPORTATION.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
17.a. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and parking?		X		
<p><b>Discussion:</b> The project as proposed is required to meet the approval of the County Fire Protection District, including the repair of the severely eroded dirt access road to meet the minimum access standards and fire truck turnout requirements. The project will generate a minimal temporary increase in traffic to the area from construction vehicles for a short duration of time to complete the project. The applicant shall post a sign at the park entrance located on Cabrillo Highway to notify the public, 10 days in advanced, that the park trail will be closed for construction. This condition is included as Mitigation Measure 13.</p> <p><b>Mitigation Measure 13:</b> A minimum of ten days in advance, the applicant shall post a sign at the Cabrillo Highway trail entrance location to notify the public of temporary closure due to construction.</p> <p><b>Source:</b> Project Plans.</p>				
17.b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) <i>Criteria for Analyzing Transportation Impacts?</i>  <i>Note to reader: Section 15064.3 refers to land use and transportation projects, qualitative analysis, and methodology.</i>				X
<p><b>Discussion:</b> The project involves legalizing the construction of an AT&amp;T cellular facility but not a change in use and is not expected to have an impact on vehicle miles travelled. Both the AT&amp;T facility and Metro PCS facility will continue to have maintenance staff occasionally visiting the site, improving the hiking trail will enable improved access for all equipment owners and trail users on the mountain. No significant traffic impacts are expected from the project since this is a service road and trail.</p>				

<b>Source:</b> Project Plans.				
17.c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
<b>Discussion:</b> The project does not involve the construction or change of any public road design features or incompatible uses. <b>Source:</b> Project Plans.				
17.d. Result in inadequate emergency access?				X
<b>Discussion:</b> The project improvements to repair an existing eroded dirt road will not result in inadequate emergency access but rather it will improve access for emergency vehicles. The San Mateo County Fire Department has reviewed the project and added conditions of approval. <b>Source:</b> Project Plans.				

<b>18. TRIBAL CULTURAL RESOURCES.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
18.a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)				X
<b>Discussion:</b> The project site is not listed in the California Register of Historical Resources nor is the location listed in a local register of historical resources, pursuant to any local ordinance or resolution as defined in Public Resources Code Section 5020.1(k). <b>Source:</b> Project Location, California Register of Historical Resources, County General Plan.				

<p>ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. (In applying the criteria set forth in Subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)</p>		X		
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**Discussion:** This project site has been developed with an infrastructure supporting cellular facilities and mobile antenna equipment since the 1960's. The possibility of the project area containing California Native American artifacts is unlikely. However, while the project is not expected to cause a substantial adverse change to any potential tribal cultural resources, the following mitigation measures are recommended to minimize any potential significant impacts to unknown tribal resources.

The County seeks to satisfy the Native American Heritage Commission's best practices and will include conditions of approval that upon findings of any potential historic artifacts, construction activity must halt until a qualified professional is brought to the site. Staff mailed letters to the referenced tribes on May 10, 2021. The tribes have 30 days to respond with comment.

**Mitigation Measure 14:** Should any traditionally or culturally affiliated Native American Tribe respond to the County's issued notification for consultation, such process shall be completed and any resulting agreed upon measures for avoidance and preservation of identified resources be taken prior to implementation.

**Mitigation Measure 15:** In the event that tribal cultural resources are inadvertently discovered during project implementation, all work shall cease until a qualified professional can evaluate the find and recommend appropriate measures to avoid and preserve the resources in place or minimize adverse impacts to the resource. Those measures shall be approved by the County Planning Department prior to implementation and prior to continuing any work associated with the project.

**Mitigation Measure 16:** Any inadvertently discovered tribal cultural resources shall be treated with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, protecting the cultural character and integrity of the resource, protecting the traditional use of the resource, and protecting the confidentiality of the resource.

**Source:** California Office of Historic Preservation, San Mateo County Listed Historical Resources.

<b>19. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
19.a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
<p><b>Discussion:</b> The project involves legalizing an AT&amp;T cellular facility and associated ground level equipment which are located within two detached sheds, plus a satellite dish and renewal of an existing Metro PCS cellular facility and associated equipment. One AT&amp;T equipment shed is located within the footprint of the antenna structure, a second shed is located adjacent to the antenna structure. The Metro PCS facility equipment is mounted on a monopole with the associated equipment shed located at ground level a few feet away. No significant environmental effects are anticipated with this project with implementation of the recommended mitigation measures.</p> <p><b>Source:</b> Project Plans.</p>				
19.b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
<p><b>Discussion:</b> The project does not necessitate water use.</p> <p><b>Source:</b> Project Plans.</p>				
19.c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
<p><b>Discussion:</b> The project does not require wastewater treatment.</p> <p><b>Source:</b> Project Plans.</p>				
19.d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
<p><b>Discussion:</b> The project is limited to minimal surface grading to repair an eroded dirt access road and will not generate any solid waste that would impair local infrastructure or conflict with waste reduction goals. Waste resulting from the project is limited to dirt removed and relocated as</p>				

necessary to install five new fire turnouts and repair the severe erosion. The cut will be redistributed to other areas of the hiking trail. No new fill material will be brought to the site. The waste is not expected to result in inadequate landfill capacity to the County's local landfill facility (Ox Mountain Landfill) which has a capacity service life until 2034.

**Source:** Project Plans, San Mateo County Integrated Waste Management Plan.

19.e. Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X
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**Discussion:** The grading repair is not expected to generate solid waste on a long-term basis. No mitigation is required.

**Source:** Project Plans.

**20. WILDFIRE.** If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
20.a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	

**Discussion:** The project is located in a Very High Fire Hazard Severity Zone, State Responsibility Area as identified by the County's GIS maps. Coastside County Fire District has conditioned that the project meets the minimum qualification for access to the cell sites and is requiring the applicant install a Knox key access for all gates and fences leading to the cell sites, install a 2A10 BC extinguisher at the sites, meet all addressing requirements, and install five new fire turnouts along the access road. The project will improve emergency response by providing an accessible 95% compacted dirt access road.

**Source:** Project Plans.

20.b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
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**Discussion:** See response to 20.a. Also, grading activity is required to meet fire safety standards for all equipment to meet spark arrester and firefighting tool requirements as specified in the California Public Resources Code.

**Source:** Project Plans.

20.c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
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**Discussion:** The proposed project does not require the installation of any new roads, fuel breaks, or power lines. The project proposes to repair an eroded hiking trail to make it safe for vehicle use. There are approximately twelve propane tanks clustered together near the AT&T cellular facility, Environmental Health Services has confirmed the propane tanks have been permitted on the site. No construction changes are proposed for the existing Metro PCS facility since it is permitted and only proposing to renew its conditional use permit. Also, see response to 20.a.

**Source:** Project Plans.

20.d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	
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**Discussion:** To legalize the AT&T cellular facility requires review is required by County drainage staff to ensure the two detached equipment sheds have adequate drainage as well as insure the repaired hiking trail has proper drainage. No changes are proposed for the Metro PCS facility. Because the project site area is not located within a seismic hazard zone and the grading work proposed will not be to significant depth, geotechnical review will take place during the building permit stage. The project will repair of the eroded dirt hiking road; drainage changes and soil stability will be improved with water bars to properly divert water and prevent future erosion.

**Source:** Project Plans.

<b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
	<i>Potentially Significant Impacts</i>	<i>Significant Unless Mitigated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
21.a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate		X		

important examples of the major periods of California history or prehistory?				
<p><b>Discussion:</b> Without mitigation the project could potentially impact biological resources based on the biologist report submitted. Mitigation measures have been included to reduce these potential impacts to less than significant level.</p> <p><b>Source:</b> All Applicable Sources Cited in this Document.</p>				
21.b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
<p><b>Discussion:</b> As defined by the CEQA Guidelines, cumulative impacts reflect “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period.” (CEQA Guidelines, Section 15355(b)). To staff’s best of knowledge, there are no known approved pending or future projects associated with or near the project site.</p> <p>The project involves legalizing one AT&amp;T cellular facility and the renewal of a one existing legal Metro PCS cellular facility. There is a third legal existing facility on site and other equipment collocated on the same tower as the AT&amp;T facility. Development impacts are considered to be minor in nature. Regarding future development, additional cellular facilities have the option to co-locate on the property which will require future review of radio frequency studies and compliance.</p> <p>The project will not impact agricultural or mineral resources. The project’s potential impacts with respect to air quality, noise, and cultural resources etc. will be limited to the grading repair. All impacts will be mitigated and there is no evidence to suggest that they would substantially combine with other off-site impacts. Due to the “stand-alone” nature of this project in conjunction with the recommended mitigation measures contained throughout this document, the project will have a less than significant cumulative impact on the environment.</p> <p><b>Source:</b> All Applicable Sources Previously Cited in This Document.</p>				
21.c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		
<p><b>Discussion:</b> As discussed in the previous sections, the proposed project includes legalizing an AT&amp;T cellular facility, renewal of an existing legal Metro PCS cellular facility and grading repair for a severely eroded dirt hiking road. Based on the discussions in the previous sections where project impacts were determined to be less than significant or mitigation measures were required to result in an overall less than significant impact, the proposed project would not cause significant adverse effects on human beings, either directly or indirectly.</p> <p><b>Source:</b> All Applicable Sources Previously Cited in This Document.</p>				

**RESPONSIBLE AGENCIES.** Check what agency has permit authority or other approval for the project.

AGENCY	YES	NO	TYPE OF APPROVAL
Bay Area Air Quality Management District		X	
Caltrans		X	
City		X	
California Coastal Commission		X	
County Airport Land Use Commission (ALUC)		X	
Other: State Parks, North Coast County Water District, Golden Gate National Recreation Area, National Park Service, San Mateo County Parks_____	X		Owner authorization/consent
National Marine Fisheries Service		X	
Regional Water Quality Control Board		X	
San Francisco Bay Conservation and Development Commission (BCDC)		X	
Sewer/Water District:		X	
State Department of Fish and Wildlife		X	
State Department of Public Health		X	
State Water Resources Control Board		X	
U.S. Army Corps of Engineers (CE)		X	
U.S. Environmental Protection Agency (EPA)		X	
U.S. Fish and Wildlife Service		X	

	<u>Yes</u>	<u>No</u>
Mitigation measures have been proposed in project application.	X	
Other mitigation measures are needed.	X	
<p>The following measures are included in the project plans or proposals pursuant to Section 15070(b)(1) of the State CEQA Guidelines:</p> <p><b><u>Mitigation Measure 1:</u></b></p> <p>The applicant shall submit a plan to the Planning and Building Department prior to the commencement of work that at a minimum includes applicable “Basic Construction Mitigation Measures” as listed in Table 8-2 of the BAAQMD CEQA Guidelines (May 2017). These measures</p>		

shall be implemented prior to beginning any project related work and shall be maintained for the duration of the project activities:

- a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- d. All vehicle speeds on unpaved roads shall be limited to 15 mph.
- e. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- f. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- g. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- h. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance.

**Mitigation Measure 2:** Noise sources associated with demolition, construction, repair, remodeling or grading of any real property shall be limited to the hours from 7:00 am. To 6:00 pm., weekdays and 9:00 a.m. to 5:00 p.m. Saturdays. Said activities are prohibited on Sundays, Thanksgiving, and Christmas (San Mateo Ordinance Code Section 4.88.360).

**Mitigation Measure 3:** Work shall stop if any listed species are encountered in the project area, the listed species shall be allowed to leave on its own volition.

**Mitigation Measure 4:** A biologist shall be present for all ground-disturbing activities and shall flag any host plants for butterflies to be avoided.

**Mitigation Measure 5:** Vehicles and equipment shall be parked on pavement, existing roads and previously disturbed areas to the maximum extent possible. If construction vehicles need to park on vegetation along the access road/hiking trail, the applicant shall work with the biologist and designate areas for off road parking needs to confirm no plant or species are impacted.

**Mitigation Measure 6:** No work shall be conducted, and all work shall cease when precipitation is forecast to be greater than 0.1 inches.

**Mitigation Measure 7:** In the event that cultural, paleontological, or archaeological resources are encountered during site grading or other site work, such work shall immediately be halted in the area of discovery and the project sponsor shall immediately notify the Community Development Director of the discovery. The applicant shall be required to retain the services of a qualified archaeologist or applicable profession for the purpose of recording, protecting, or curating the discovery as appropriate. The cost of the qualified archaeologist, or applicable professional, and of any recording, protecting, or curating shall be borne solely by the project sponsor. The archaeologist, or applicable professional, shall be required to submit to the Community Development Director for review and approval a report of the findings and methods of curation or

protection of the resources. In addition, an archaeological (or applicable professional), report meeting the Secretary of the Interior's Standards detailing the findings of the monitoring will be submitted to the Northwest Information Center after monitoring has ceased. No further grading or site work within the area of discovery shall be allowed until the preceding has occurred.

**Mitigation Measure 8:** If a newly discovered resource is, or is suspected to be, Native American in origin, the resource shall be treated as a significant Tribal Cultural Resource, pursuant to Public Resources Code 21074, until the County has determined otherwise with the consultation of a qualified archaeologist and local tribal representative.

**Mitigation Measure 9:** In the event of discovery or recognition of any human remains during project construction, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains. The applicant shall then immediately notify the County Coroner's Office and possibly the State Native American Heritage Commission to seek recommendations from a Most Likely Descendant (Tribal Contact) before any further action at the location of the find can proceed. All contractors and sub-contractors shall be made aware of these requirements and shall adhere to all applicable laws including State Cultural Preservation laws. Disposition of Native American remains shall comply with CEQA Guidelines Section 15064.5(e).

**Mitigation Measure 10:** Prior to the issuance of the building permit for the property, the applicant shall submit to the Planning Department for review and approval an erosion and drainage control plan that shows how the transport and discharge of soil and pollutants from and within the project site shall be minimized. The plan shall be designed to minimize potential sources of sediment, control the amount of runoff and its ability to carry sediment by diverting incoming flows and impeding internally generated flows, and retain sediment that is picked up on the project site through the use of sediment-capturing devices. The plan shall also limit application, generation, and migration of toxic substances, ensure the proper storage and disposal of toxic materials, and apply nutrients at rates necessary to establish and maintain vegetation without causing significant nutrient runoff to surface waters. Said plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including:

- a. Sequence construction to install sediment-capturing devices first, followed by runoff control measures and runoff conveyances. No construction activities shall begin until after all proposed measures are in place.
- b. Minimize the area of bare soil exposed at one time (phased grading).
- c. Clear only areas essential for construction.
- d. Within five (5) days of clearing or inactivity in construction, stabilize bare soils through either non-vegetative best management practices (BMPs), such as mulching, or vegetative erosion control methods, such as seeding. Vegetative erosion control shall be established within two (2) weeks of seeding/planting.
- e. Construction entrances shall be stabilized immediately after grading and frequently maintained to prevent erosion and to control dust.
- f. Control wind-born dust through the installation of wind barriers such as hay bales and/or sprinkling.
- g. Soil and/or other construction-related material stockpiled on-site shall be placed a minimum of 200 feet from all wetlands and drain courses. Stockpiled soils shall be covered with tarps at all times of the year.

- h. Intercept runoff above disturbed slopes and convey it to a permanent channel or storm drains by using earth dikes, perimeter dikes or swales, or diversions. Use check dams where appropriate.
- i. Provide protection for runoff conveyance outlets by reducing flow velocity and dissipating flow energy.
- j. Use silt fence and/or vegetated filter strips to trap sediment contained in sheet flow. The maximum drainage area to the fence should be 0.5 acres or less per 100 feet of fence. Silt fences shall be inspected regularly, and sediment removed when it reaches 1/3 the fence height. Vegetated filter strips should have relatively flat slopes and be vegetated with erosion-resistant species.
- k. Throughout the construction period, the applicant shall conduct regular inspections of the condition and operational status of all structural BMPs required by the approved erosion control plan.
- l. No erosion or sediment control measures will be placed in vegetated areas.
- m. Environmentally sensitive areas shall be delineated and protected to prevent construction impacts.
- n. Control of fuels and other hazardous materials, spills, and litter during construction.
- o. Preserve existing vegetation whenever feasible.

**Mitigation Measure 11:** The applicant shall post two yellow caution signs at the site access location and one Information sign posted at gate locations #1 and #2.

**Mitigation Measure 12:** Prior to the issuance of the Building permit, the applicant shall have prepared, by a registered civil engineer, a drainage analysis of the proposed project and submit it to the Department of Planning and Building for review and approval. The drainage analysis shall consist of a written narrative and a plan. The flow of the stormwater onto, over, and off of the dirt road shall be mitigated so that it does not create rills and gullies in the roadway. Recommended measures shall be designed and included in the improvement plans and submitted to the Department of Planning and Building for review and approval. Options for approach to showing that ongoing erosion prevention has been addressed:

- a. Provide plan and profile with drainage calculations at various slopes on the plans. Provide matrix for repair.
- b. Provide inventory of specific locations to be repaired on the plans with matrix for repair. Provide calculations as appropriate, and example details for waterbars, etc.
- c. Set up agreement to review annually for the life of the project. Set aside funds to cover costs or hire engineer to submit reports. Drone fly over is ok.
- d. For slopes greater than 15 percent, the surface needs to be asphalt with no slopes over 20 percent, unless permission is obtained from the fire district to waive this requirement.
- e. Details and typical construction erosion control (EC) measures/stormwater BMPs will be specified on the plans to be implemented as-needed along the roadway. The portion of the roadway within the Areas of Special Biological Significance (ASBS) shall be highlighted and particular care for EC installation will be required in this area.

**Mitigation Measure 13:** A minimum of ten days in advance, the applicant shall post a sign at the Cabrillo Highway trail entrance location, to notify the public of temporary closure due to construction.

**Mitigation Measure 14:** Should any traditionally or culturally affiliated Native American Tribe respond to the County's issued notification for consultation, such process shall be completed and any resulting agreed upon measures for avoidance and preservation of identified resources be taken prior to implementation.

**Mitigation Measure 15:** In the event that tribal cultural resources are inadvertently discovered during project implementation, all work shall cease until a qualified professional can evaluate the find and recommend appropriate measures to avoid and preserve the resources in place or minimize adverse impacts to the resource. Those measures shall be approved by the County Planning Department prior to implementation and prior to continuing any work associated with the project.

**Mitigation Measure 16:** Any inadvertently discovered tribal cultural resources shall be treated with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, protecting the cultural character and integrity of the resource, protecting the traditional use of the resource, and protecting the confidentiality of the resource.

**DETERMINATION** (to be completed by the Lead Agency).

On the basis of this initial evaluation:

I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Planning Department.

\_\_\_\_\_

X

I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because of the mitigation measures in the discussion have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

6/1/21

Date

\_\_\_\_\_  
(Signature)

Planner III

\_\_\_\_\_  
(Title)