

PUBLIC DRAFT
INITIAL STUDY and ENVIRONMENTAL CHECKLIST

FOR

*AT&T MOBILITY
GUALALA WIRELESS ANTENNA*

March 5, 2022

**Lead Agency:
County of Mendocino**

Lead Agency Contact:
Keith Gronendyke, Planner III
Mendocino County Planning and Building Services
860 North Bush Street, Ukiah, CA 95482
(707) 234-6650

Section I	Description Of Project/Project Summary
	<p>DATE: MARCH 5, 2022 PROJECT TITLE: U_2021-0006 (AT&T COMMUNICATIONS GUALALA WIRELESS ANTENNA) DATE FILED: MAY 7, 2021 APPLICANT: AT&T MOBILITY PROJECT COORDINATOR: KEITH GRONENDYKE, PLANNER III; (707-234-6650) REQUEST: Coastal Development Use Permit to construct a new 120 foot tall cellular antenna tower with a lattice type design. Twelve (12) panel antennas would be placed upon the tower along with one (1) GPS unit, fifteen (15) RRUs along with nine (9) others for future tower loading and four (4) surge suppressors. A 1,800 square foot equipment lease area surrounded by a six foot tall chain link fence is also proposed at the base of the tower, which will include a pre-manufactured 64 square foot equipment shelter with associated interior equipment and a 30 kw AC diesel standby generator attached to a 190 gallon capacity belly tank with a level 2 acoustic enclosure. All equipment will be placed on concrete slabs. ENVIRONMENTAL DETERMINATION: Based on the attached Initial Study, the proposed Wireless Communications Facility would not have a substantial adverse impact on the environment, and a Negative Declaration is recommended. LOCATION: In the Coastal Zone, 2.27± miles northeast of Gualala, lying on the south side of Country Club Way (CR 514A), 990± feet southwest of its intersection with Ocean Ridge Drive, located at 45315 Country Club Way, Gualala; APN: 144-220-15.</p>

Section II	Project Description
	<p>INTRODUCTION: The proposal is construction and operation of a wireless communication facility consisting of a 120 ft. tall lattice type designed tower with various appurtenant equipment and ground equipment, including a 30 Kw generator with a 190 gallon diesel fuel belly tank and various equipment cabinets. Associated improvements include a 15 ft. wide easement for access and utilities to the site location. The proposed lattice tower will be located within a 1,800 square foot fenced compound.</p> <p>PROJECT OBJECTIVES: The Applicant is requesting construction of a 120 foot tall wireless communications tower with various appurtenant equipment and ground equipment including a generator and equipment cabinet. Co-location opportunities will be available to other carriers. Twelve panel antennas would be placed upon the tower along with one GPS unit, fifteen RRUs along with nine others for future tower loading and four surge suppressors. The tower will be a lattice type design; This type of tower is best for camouflage at this site because the surrounding trees aid in hiding the cell tower. Associated improvements to the subject parcel include a 15 foot. wide easement for access and utilities to the wireless communications tower facility. The proposed lattice tower will be located within a 1,800 square foot fenced compound.</p> <p>The facility will operate 24 hours a day 7 days a week. No more than two technicians will be at the site at any one time. The generator will be turned on once a week for 15 minutes for maintenance purposes. Maintenance operations are limited to the hours of 8:30am to 4:30pm and shall occur only on weekdays (Monday through Friday). There will be minimal noise from the standby generator. AT&T's objective for the Gualala site is to provide wireless high-speed broadband internet to nearby residences and to fill a significant mobility coverage gap in the service area. The site will incorporate the FirstNet program, which allows first responders to get information quickly to help them make decisions in a timely manner. The height of 120 feet will allow the signal to pass over tall evergreen trees in the vicinity and cover a distance of up to two miles from the site location, including in the community of Gualala.</p> <p>SETTING AND LOCATION: The parcel is located 2.27± miles northeast of Gualala, lying on the south side of Country Club Way (CR 514A), 990± feet southwest of its intersection with Ocean Ridge Drive, located at 45315 Country Club Way, Gualala (APN: 144-220-15). The parcel is entirely within the coastal zone and has an existing single-family residence (addressed as 45320 Country Club Way) along with an accessory structure located on it. This residence is proposed to be approximately 381 feet to the north of the tower. The subject parcel is zoned</p>

Remote Residential. Elevation at the project site is approximately 911 feet above mean sea level (amsl) while the community of Gualala averages approximately 124 feet amsl. Gualala Airport is located approximately one-half mile to the east of the project site. The tower site is located in an open area of the subject property, but is surrounded towards the east by coastal forest populated by Sequoia sempervirens trees with a height equal to or greater than the tower height. The project site is relatively flat, but a tree covered hill does block views of the tower from State Route 1 and the aforementioned evergreen trees block the view of the tower from Old Stage Road. The only clear view of the tower is from Country Club Drive, which only serves two lots. The surrounding zoning to the north, south and west is also RMR 40, while to the east zoning changes to RR 5 as a subdivision (Ocean Ridge Subdivision) of approximately forty-three lots has been developed within the airport vicinity with lot sizes of approximately 0.40 acres (17,420± square feet).

BASELINE CONDITIONS: Pursuant to CEQA Guidelines Section 15125, the Project Description is required to identify the existing baseline set of physical characteristics. For this project, the baseline conditions include a single-family residence approximately 380 feet away to the north with another residence located on an adjacent property to the west which also is owned by the same person as the subject property. A subdivision of forty-three lots with sizes of approximately 0.40 acres and developed with single-family residences is located to the east between the airport and the subject property. A small pond lies immediately to the west of the proposed tower site.

Section III Environmental Checklist.

“Significant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change, may be considered in determining whether the physical change is significant (CEQA Guidelines, Section 15382).

Accompanying this form is a list of discussion statements for all questions, or categories of questions, on the Environmental Checklist (See Section III). This includes explanations of “no” responses.

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" as indicated by the checklist on the following pages.

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input type="checkbox"/> Geology/Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards and Hazardous Materials
<input type="checkbox"/> Hydrology/Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Recreation	<input type="checkbox"/> Transportation	<input type="checkbox"/> Tribal Cultural Resources
<input type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Wildfire	<input type="checkbox"/> Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- 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 revisions in the project have been made by or agreed to by the project proponent. 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.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

3/07/2022
DATE

KEITH GRONENDYKE
PLANNER III

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 in the parentheses following each question. 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 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 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 and 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: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY/ENVIRONMENTAL REVIEW: This section assesses the potential environmental impacts which may result from the project. Questions in the Initial Study Checklist are stated and answers are provided based on analysis undertaken.

<u>I. AESTHETICS</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Less Than Significant Impact:** The site is not designated as “highly scenic.” The project site is densely forested to the south, west and east with an open field located to the north of the project site. The forest is comprised of redwood-fir forest and dominated by second-growth coast redwoods reaching heights that are a variety of higher and lower elevations than the proposed tower. The only unobstructed view of the tower would be from the north/northeast when in the open meadow area surrounding the existing single-family residence. This will allow the lattice type design of the tower to blend into the natural surroundings. As such, the impact on any scenic vistas would be less than significant.
- b) **No Impact:** State Route 1, which is the nearest State Highway to the project location, is not designated as a state scenic highway, but it is listed as an eligible roadway. The project site is located approximately 1.21 miles northeast of State Route 1 while the elevation of the terrain rises from the highway towards the project site, which naturally hides the tower location from view. As such, there will be no impact on scenic resources as a result of the project.
- c) **Less Than Significant Impact:** As the site is undeveloped there will be limited degradation to the existing visual character and quality of the site and its surrounding. Standard wireless communication monopoles or lattice towers can present a negative aesthetic impact due to their high visibility and metal construction, although, in this instance, the use of a lattice type of design aids in camouflaging the tower, as the design is partially see-through and does not present a wide and tall silhouette that a faux pine tree would. The location is surrounded on three sides by foliage which will naturally disguise the facility from the public right-

of-way. The surrounding area is primarily comprised of redwood-fir forest and dominated by second-growth coast redwoods, creating a natural backdrop. The existing topography will screen the ground equipment and part of the lattice tower from views from the public rights-of-ways. Several conditions (numbered 1-8) are recommended to ensure that the facility and associated infrastructure are constructed in a manner consistent with Mendocino County Code requirements for the protection of visual resources within the coastal zone. The site and surrounding area can be classified as rural. Therefore, impacts will be less than significant.

- d) **Less Than Significant Impact:** Two lights are proposed for the equipment cabinet. The lights will be shielded and down-tilted with motion sensors and automatic shut-off timers and will not cause a substantial amount of light or glare that will affect nighttime views in the area. The tower itself will have no lights and will not create substantial amounts of glare. Likewise, appurtenant structures will be designed with matte finishes and are not visible from public vantage points. With the implementation of outdoor lighting regulations at the time of development (condition number 6), the proposed project would not create new sources of substantial lighting or glare that would generate a significant impact. Therefore, impact will be less than significant.

<p align="center"><u>II. AGRICULTURE AND FORESTRY RESOURCES.</u></p> <p>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 Forest Protocols adopted by the California Air Resources Board. Would the project:</p>	<p align="center">Potentially Significant Impact</p>	<p align="center">Less Than Significant with Mitigation Incorporated</p>	<p align="center">Less Than Significant Impact</p>	<p align="center">No Impact</p>
<p>a) 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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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 forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-e) **No Impact:** The proposed project will take place on land that is not designated as Prime or Unique Farmland. According to the Farmland Mapping and Monitoring Program (FMMP) of the California Department of Conservation, Division of Land Resource Protection, the site is designated as Grazing Land (G). This designation is for land on which the existing vegetation is suited to the grazing of livestock. The project site is developed with a single-family residence along with accessory structures. The adjoining property to the west appears to have a variety of barn/livestock structures constructed. The subject site will only use a 1,800 square foot leased area for development of the tower and facilities. Construction of the proposed project will not preclude the parcel from further Agricultural uses as outlined in Mendocino County Code Section 20.364.015(D) – Coastal Agricultural Use Types, or in Chapter 3, Section 30241 of the Land Use Plan. Therefore, there will be no impact on Prime, Unique or Farmland of Statewide Importance as a result of the project.

The Project site is not encumbered by a Williamson Act contract.

The project site is located within the Remote Residential (RMR20) Zoning District.

The Timberland Production Zone (TPZ) was established in 1976 in the California Government Code as a designation for lands for which it is demonstrated that the “highest and best use” would be timber production and accessory uses. The Project site is not within the Timber Production Zoning District, nor within a Forest Land General Plan designation. The proposed project will not convert Farmland as it will not preclude use of the subject parcel from timber production or agricultural uses. Therefore, there will be no impact.

III. AIR QUALITY.				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of any applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact:** The project will not conflict with or obstruct implementation of any air quality plan as there are no components of the project that would conflict with any existing air quality plans. Additionally, Conditions

of Approval are included that will ensure that the project will achieve compliance with Mendocino County Air Quality Management District (AQMD) standards.

- b) **Less Than Significant Impact:** Coastal Mendocino County has a mild Mediterranean climate with abundant rainfall. AQMD operates air monitoring stations in Fort Bragg, Ukiah, and Willits. Based on the results of monitoring, the entire County is in attainment for all State standards with the exception of particulate matter less than 10 microns in size (PM10). The most common source of PM10 is wood smoke from home heating or brush fires, and dust generated by vehicles traveling over unpaved roads. A PM10 attainment plan was finalized in 2005 that provides regulations for construction and grading activities and unpaved roads. Ocean Ridge Drive, located to the east is paved, while Country Club Drive that accesses the project site is not. The access road from Country Club Drive to the project site is proposed to be approximately 606 feet long with a gravel surface. The proposed project has the potential to increase PM10 in the immediate vicinity of the site during access road construction due to the road conditions. The proposed construction and use of internal access roads, if constructed in conformance with the conditions of approval (8 to 10), is not expected to contribute substantially to PM10 levels such that a significant impact would result. Local impacts to the area during construction would be less than significant using standard dust control measures. Conditions of Approval are recommended that will ensure that the project will achieve compliance with AQMD standards.

- c-d) **No Impact:** Sensitive receptors can include schools, parks, playgrounds, day care centers, nursing homes, hospitals, and residential dwellings. The project is located within a primarily low density residential area. The project will not result in substantial pollutant concentrations and will not generate objectionable odors that would affect a substantial number of people. Therefore, there will be no impact.

<u>IV. BIOLOGICAL RESOURCES.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Less Than Significant:** The California Natural Diversity Database (CNDDDB) provides location and natural history information on special status plants, animals, and natural communities to the public, other agencies, and conservation organizations. The data help drive conservation decisions, aid in the environmental review of projects and land use changes, and provide baseline data helpful in recovering endangered species and for research projects.¹ Currently, the CNDDDB has 32 species listed for Mendocino County that range in listing status from Candidate Threatened to Threatened to Endangered.²

Many species of plants and animals within the State of California have low populations, limited distributions, or both. Such species may be considered “rare” and are vulnerable to extirpation as the state’s human population grows and the habitats these species occupy are converted to agricultural and urban uses. A sizable number of native species and animals have been formally designated as threatened or endangered under State and Federal endangered species legislation. Others have been designated as “Candidates” for such listing and the California Department of Fish and Wildlife (CDFW) have designated others as “Species of Special Concern”. The California Native Plant Society (CNPS) has developed its own lists of native plants considered rare, threatened or endangered. Collectively, these plants and animals are referred to as “special status species.”

Various direct and indirect impacts to biological resources may result from the small amount of development enabled by the project, including the loss and/or alteration of existing undeveloped open space that may serve as habitat. Increased vehicle trips to and from the project site can result in wildlife mortality and disruption of movement patterns within and through the project vicinity. Disturbances such as predation by pets (e.g., cats and dogs) and human residents may also occur at the human/open space interface, while conversion of land from lower to higher density residential use can lead to a predominance of various urban-adapted wildlife species (e.g., coyotes, raccoons, ravens and blackbirds) that have been observed to displace more sensitive species.

The project applicant had a biological assessment completed for the project site. Per the applicant’s biological resource assessment, and subsequent additional information, conducted by Geist Engineering & Environmental Group, three (3) vegetation communities were observed within the study area: 1) *Festuca rubra* Herbaceous Alliance 2) *Sequoia sempervirens* Forest Alliance and 3) ruderal disturbed vegetation. Additional studies completed were a wetland delineation, a special-status natural communities study, a Federal Critical Habitat study and a delineation of wetlands and water courses. The results of these studies was that:

“thirty-six special-status plant species were identified as having the potential to occur within the proposed project site and buffer area. A plant species was included as having potential to occur based on a combination of suitable habitat presence, and previously known occurrences in the area. Botanical surveys were conducted during the appropriate flowering season for all identified sensitive plant species. No targeted special-status plant species were observed in the study area during the botanical surveys. Therefore, no avoidance or minimization measures are proposed at this time. Per the completed Biological Resources Assessment Report it is our finding that potential impacts to wildlife or plants can be avoided with the below Best Management Construction Practices as well as standard Construction Conditions.”

The applicant intends to implement Best Management Practices and Standard Construction Conditions with regards to the ESHA, including; 1) Surveys for identified special-status species by qualified biologists before construction starts. 2) Construction Best Management Practices as well as Standard Construction Conditions with regards to staging and fueling, silt fencing, pre-construction surveys, biological monitor, Environmental Awareness Training for workers, and site boundaries shall be clearly delineated by stakes. 3) Specific to the Best Management Practices stated above, silt fencing located by the biologist will be placed in all areas of ground disturbance to keep all ground disturbance activities, and working areas for equipment, away from the existing feature to be avoided, including existing access routes to minimize inadvertent degradation or loss of adjacent habitat during project operations.

¹ <https://www.wildlife.ca.gov/Data/CNDDDB/About>

² <https://map.dfg.ca.gov/bios/?tool=cnddbQuick>

The subject site has had species identified on or near it that have been categorized by the California Department of Fish and Wildlife (CDFW) as being a California Species of Special Concern. These species include: the Marbled Murrelet, Osprey, the Northern Spotted Owl, the Sonoma Tree Vole, the Townsend's Big-Eared Bat, the Pacific Tailed Frog, the California giant salamander, the foothill yellow-legged frog, California red-legged frog, the red-bellied newt, the Behren's Silverspot Butterfly and the Lotus Blue Butterfly. Plant species include the supple daisy and the coast lily. Based upon review of the project site's location and size, and proximity to natural habitats, it is unlikely that approval of the current proposal of a 1,800 square foot facility and cell tower would result in an impact of significance to the identified species.

Potential Impacts to Nesting Special-Status Avian Species from Project Activities

Implementation of the proposed project could potentially impact individual, foraging and nesting migratory birds, raptor species, marbled murrelets, osprey and northern spotted owls should they become established within the proposed project site or buffer area prior to project implementation. Impacts to these species could occur through crushing by construction equipment during implementation of project activities. Actively nesting birds could also be affected due to noise and vibration from project activities, if nests are located close enough to project activities. Project related noise and vibration could cause the abandonment of active nest sites. Impacts to these species would be considered significant. In the event that nesting birds become established in the proposed project site or buffer area, the following Standard Construction Conditions measures will be implemented. Condition 12 has been added that will ensure protection of nesting special-status avian species.

Potential Impacts to Townsend's Big-Eared Bat from Project Activities

Implementation of the proposed project has the potential to impact Townsend's big-eared bat maternity sites if these species are present in the project site or buffer area during implementation of the project activities if they have established maternity or roosting sites in trees, or in other potential maternity, roosting or hibernation sites. Impacts to bat maternity/roost/hibernation sites would occur primarily from direct disturbance due to earth moving activities and tree removal, and indirectly noise and vibration created from project construction equipment and construction related activities. Noise and vibration could lead to these bat species abandoning established roosting/maternity/hibernation sites. Impacts to these species would be considered significant. In the event that bat roost/maternity/hibernation sites become established in the proposed project site or buffer area prior to project implementation, condition of approval number 13 has been added to ensure protection of this species.

Potential Impacts to California Giant Salamander and Red-Bellied Newt from Project Activities

Implementation of the proposed project has the potential to result in direct impacts to the California giant salamander or Red-Bellied Newt species should they be present in the proposed project site during project activities. No individuals of either of these species were observed during biological surveys. Direct impacts to individuals of these species could result from ground disturbance activities during project implementation. These species could be directly impacted by crushing by construction equipment. These impacts could result in direct mortality of individuals or small populations of these two species. The following condition of approval number 14 has been added to ensure the protection of this species:

Potential Impacts to California Red-Legged Frog, Foothill Yellow-Legged Frog and Pacific Tailed Frog from Project Activities

Implementation of the proposed project has the potential to result in direct impacts to California red-legged frog (CRF), Foothill yellow-legged frog and the Pacific tailed frog should they be present in the proposed project site during project activities. No individuals of either of these species were observed during biological surveys in upland refuge habitat (found in project site and buffer area), and none have been observed within the proposed project site or immediate buffer area as indicated by the search of the CNDDDB database. No aquatic breeding habitat was observed in either the project site or buffer area during biological surveys. Direct impacts to individuals of these species could result from ground disturbance activities during project implementation within upland refuge habitat when movement across these areas is occurring. Impacts could also occur in refuge habitat if individuals of this species are aestivating in underground refugia or under debris. These species could be directly impacted by crushing by construction equipment. These impacts could result in direct mortality of individuals or small populations of these species. On direct impacts are proposed to the aquatic breeding and foraging habitat of this species, so no direct impacts are anticipated. The following condition of approval number 15 has been added to ensure the protection of these species:

Potential Impacts to Special-Status Plant Species from Project Activities

Review of the USFWS (USFWS 2019), the CNPS (CNPS 2019) and the CNDDDB (CNDDDB 2019) databases revealed that 36 listed plant species and species of concern have potential to occur in the general project area. Potential habitat is present in the proposed project site and buffer area for 27 of these 36 plant species. Botanical surveys were conducted within the blooming period of 8 of these 27 special-status plant species.

Survey findings for the 8 targeted special-status plant species that had blooming periods during surveys were negative. Therefore, no impacts to those species is expected due to project implementation.

Because botanical surveys were conducted outside of the blooming period of the remaining 19 special-status species, it cannot be said with certainty that these species do not occur within the proposed project site or buffer area. Therefore, additional surveys will be required to determine their presence or absence.

Implementation of the proposed project could potentially result in impacts on these 19 special-status plant species if they are located within the proposed project site during project activities. Direct impacts to these plant species could result from ground disturbance activities during project implementation. Special-status plant species could be directly impacted by crushing of plants by construction equipment. These impacts could result in direct mortality of individuals or small populations of special-status plant species.

A qualified botanist will conduct future pre-construction botanical surveys to identify any populations of the remaining 19 special-status plant species within the proposed project site that will be disturbed during project activities. These surveys shall be conducted prior to the initiation of any construction activities and coincide with the appropriate flowering period of the special-status plant species with the potential to occur in the project area. The following conditions of approval, numbers 16 and 17, have been incorporated to avoid impacts to any special-status plant species populations identified within or adjacent to the proposed disturbance areas.

Potential Impacts to Festuca rubra Herbaceous Alliance from Project Activities

Festuca rubra Herbaceous Alliance was observed within the proposed project site, the access road improvement area, the proposed power/fiber optic cable underground installation route and the buffer of these areas. Conditions of approval numbered 18 to 21 have been added to avoid impacts to this vegetative community.

Plant species: Botanical surveys for plants were conducted on May 1 and 30, and June 24, 2019. These surveys were conducted during the appropriate flowering season for all identified sensitive plant species. Based on initial assessments no Federal critical habitat was identified within the proposed project site and buffer area. Three (3) vegetation communities were observed within the study area and include the following: 1) redwood-fir forest, 2) freshwater emergent wetland (see Mitigation Measure BIO-1), and 3) ruderal vegetation. No targeted special status plant species were identified in the study area during the three surveys. However, best Construction Practices as well as Standard Construction Conditions are recommended (conditions 24 and 25).

- b - c) **Less Than Significant Impact:** Waters of the United States (U.S.), including wetlands, are broadly defined to include navigable waterways, and tributaries of navigable waterways, and adjacent wetlands. Although definitions vary to some degree, wetlands are generally considered to be areas that are periodically or permanently inundated by surface water or groundwater, supporting vegetation adapted to life in saturated soil. Jurisdictional wetlands are vegetated areas that meet specific vegetation, soil, and hydrologic criteria defined by the U.S. Army Corps of Engineers (USACE). The USACE holds sole authority to determine the jurisdictional status of waters of the U.S., including wetlands. Jurisdictional wetlands and waters of the U.S. include, but are not limited to, perennial and intermittent creeks and drainages, lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands. Wetland and waters of the U.S. provide critical habitat components, such as nest sites and reliable source of water for a wide variety of wildlife species.

A delineation of wetlands and watercourses within the project study area was conducted during a March 12, 2020 survey. Impacts to wetlands are not proposed as part of the project.

- d) **Less Than Significant Impact:** Wildlife movement corridors are routes frequently utilized by wildlife that provide shelter and sufficient food supplies to support wildlife species during migration. Movement corridors generally consist of riparian, woodlands, or forested habitats that span contiguous acres of undisturbed habitat. Wildlife movement corridors are an important element of resident species home ranges, including deer and coyote. The proposed project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species as the proposed application proposes limited development in disturbed areas. The California Natural Diversity Database lists the subject parcel as a potential habitat for the Townsend’s big-eared bat. Condition of approval number 13 has been added to ensure protection of this species.
- e) **Less Than Significant Impact:** Though some vegetation removal will be required for construction, the proposed project does not conflict with any local policies or ordinances protecting biological resources or tree preservation policies. A Condition of Approval, number 18 has been included that any future tree removal at the site will require a Coastal Development Permit or modification to this permit to ensure that local policies and ordinances are adhered to, unless tree removal is part of a Timber Harvest Plan.
- f) **No Impact:** The proposed project will not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved habitat conservation plan as there are none that exist that would be applicable to the resources identified on the project site. Therefore, there will be no impact.

<u>V. CULTURAL RESOURCES.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a - b) **No Impact:** Per California Code of Regulations, Title 14, Chapter 3, Sub Section 15064.5(b)(1); a “substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an (sic) historical resource would be materially impaired.” The applicant submitted a Cultural Resources Assessment Report, conducted by EBI Consulting on June 22, 2021. No evidence of cultural remains was identified. Culturally modified material such as flaked stone, bone, fire-altered rock, marine items and historic artifacts and features were not in view on the ground surface or in rodent back dirt. The proposed project was heard by the Archeological Commission on October 13, 2021. The Commission accepted the survey and recommended no further studies. A standard Condition, number 23, advises the property owner of the Discovery Clause, which prescribes the procedures subsequent to the discovery of any cultural resources during construction of the project.
- c) **No Impact:** MCC Section 22.12.090 governs discovery and treatment of archaeological resources, while Section 22.12.100 speaks directly to the discovery of human remains and codifies the procedures by which said discovery shall be handled. Per Mendocino County Coastal Element, Section 3.5-10,

The County shall review all development permits to ensure that proposed projects will not adversely affect existing archaeological and paleontological resources. Prior to approval of any proposed development within an area of known or probable archaeological or paleontological significance, a limited field survey by a qualified professional shall be required at the applicant's expense to determine the extent of the resource. Results of the field survey shall be transmitted to the State Historical Preservation Officer and Cultural Resource Facility at Sonoma State University for comment. The County shall review all coastal development permits to ensure that proposed projects incorporate reasonable

mitigation measures so the development will not adversely affect existing archaeological/paleontological resources. Development in these areas are subject to any additional requirements of the Mendocino County Archaeological Ordinance.

The proposed project will not disturb any known human remains as no remains or cemeteries have been documented on the project site.

<u>VI. ENERGY</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a – b) **Less Than Significant Impact:** The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation, nor would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As noted above, permanent structures constructed on-site would be subject to Part 6 (California Energy Code) of Title 24 of the California Code of Regulations, which contains energy conservation standards applicable to residential and non-residential buildings throughout California. It is not anticipated the proposed tower and associated ground based structures would use or waste significant amounts of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

<u>VII. GEOLOGY AND SOILS.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) **Less Than Significant Impact:** Mendocino County Coastal Element Chapter 3.4 titled Hazards Management, addresses seismic, geologic, and natural forces within the Coastal Zone. Mapping does not associate the following with the subject site: faults, bluffs, landslides, or erosion. The property neither lies within, nor does it adjoin a mapped Alquist-Priolo Earthquake Fault Zone. The San Andreas Fault is located approximately 1 mile east of the project site and is the nearest active fault. The site is designated on the Mendocino County Local Coastal Program Land Capabilities and Natural Hazards Map as having the potential for intermediate shaking levels in terms of seismicity. This project does not conflict with any state or local seismic hazard policy or plan.

The project site is relatively flat with no hillsides in the vicinity. As such landslides would not impact the project.

b) **Less Than Significant Impact:** Potential development impacts will be kept to a minimum with the uniform application of standard construction site erosion control requirements recommended in the condition of approval, number 25, and those regulations found in MCC Chapter 16.30 Stormwater Runoff Pollution Prevention Procedure.

c) **Less Than Significant Impact:** The soils present on the property are comprised of Irmulco-Tramway complex, Caspar-Quinliven-Ferncreek complex, Havensneck sand loam and Ornbaun-Zeni complex. Permeability is moderate and the potential for liquefaction is very low. The project poses a less than significant impact.

d) **No Impact:** The proposed site does not contain soils meeting the criteria of expansive soils as defined in Table 18-1-B of the Uniform Building Code (1994); therefore, there will be no impact as a result of the project.

e) **No Impact:** The proposed development of a wireless communications facility does not include on-site sewage disposal.

f) **Less Than Significant.** The applicant submitted a Cultural Resources Assessment Report, conducted by EBI Consulting on June 22, 2021. No evidence of cultural remains was identified. Culturally modified material such as flaked stone, bone, fire-altered rock, marine items and historic artifacts and features were not in view on the ground surface or in rodent back dirt. The proposed project was heard by the Archeological Commission on October 13, 2021. The Commission accepted the survey and recommended no further studies. A standard Condition, number 23, advises the property owner of the Discovery Clause, which prescribes the procedures subsequent to the discovery of any cultural resources during construction of the project.

<u>VIII. GREENHOUSE GAS EMISSIONS.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Less Than Significant Impact:** Mendocino County General Plan identifies climate change as an emerging issue for the County, and the emission of greenhouse gases as a primary contributing factor. On April 29, 2015 Governor’s Executive Order #B-30-15 was passed for the State of California and set a greenhouse gas emissions target for 2030 to be 40% below accepted 1990 levels.³ The primary source of potential greenhouse gas emissions from the project are the back-up generator that is proposed, which will only be turned on for extended time periods in case of a power outage or emergency situation. The generator will also be set to run for approximately 15 minutes once a month during daylight hours to ensure that it will be operational when needed during a power outage or emergency. In addition to the generator, vehicles accessing the project site during the construction phase and monthly scheduled maintenance will occur. It is expected the scheduled maintenance will require one vehicle to access the project site. These potential emissions are not considered significant.
- b) **No Impact:** There is no applicable plan or policy that this project will conflict with as the project will not result in a significant increase in greenhouse gas emissions given that there is minimal additional development proposed. The primary source of potential greenhouse gas emissions from the project is the back-up generator proposed, which will only be turned on in case of a power outage or emergency situation.

<u>IX. HAZARDS AND HAZARDOUS MATERIALS.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

³ California Climate Change Executive Orders; http://www.climatechange.ca.gov/state/executive_orders.html

IX. HAZARDS AND HAZARDOUS MATERIALS.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **No Impact:** Nothing in the proposed project can be construed as exacerbating existing hazardous conditions in the County. The provisions in Government Code Section 65962.5 are commonly referred to as the “Cortese List”. The list, or a site’s presence on the list, has bearing on the local permitting process as well as on compliance with the California Environmental Quality Act (CEQA). The Department of Toxic Substances Control (DTSC), under Government Code Section 65962.5(a), Section 65962.5(a)(1) requires that DTSC “shall compile and update as appropriate, but at least annually, and shall submit to the Secretary for Environmental Protection, a list of all the following:(1) [a]ll hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (“HSC”).” The subject parcel does not appear on the Cortese List. The applicant is proposing to install an emergency generator, which would be fueled by a 190 gallon diesel belly tank, and to be used solely for providing emergency power during periods of energy transmission interruption and for routine testing. Fuel trucks will need to access the site to refuel and the number of trips will depend on the number and length of primary line power outages. The periodic transport of diesel fuel to the site is not expected to create a significant hazard to the public or the environment.
- b) **No Impact:** Materials such as oil and diesel fuel used for the generator is subject to a Hazardous Materials Management Plan (HMMP) as approved by the County Department of Environmental Health (DEH). The plan identifies actions to be taken should a fuel or oil spill occur on site, including cleanup methods and appropriate agencies to contact in an emergency situation. Utilization of a generator as a back-up power source for wireless telecommunication facilities is common and staff is unaware of any fuel spill associated with any existing facilities in the County. Staff has included a condition of approval, number 25 to ensure that an HMMP is prepared if it is in fact required by DEH. No mitigation required.
- c) **No Impact:** The proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Additionally the site is located approximately 9 miles south of the City of Point Arena, which is the location of the nearest school. Therefore, there will be no impact as a result of the project.
- d) **No Impact:** The project site is not listed as a hazardous materials site on any list compiled pursuant to Government Code Section 65962.5; therefore, there will be no impact as a result of the project.
- e) **No Impact:** The Ocean Ridge Airport is located approximately one-half mile to the east of the project site and is located within an airport zone (Airport Zone D), which only limits uses that could be considered hazardous to aircraft flight. There are surrounding trees that are taller than the proposed cellular antenna tower. As such, there will be no safety hazard for people residing or working in the project area from Ocean Ridge Airport.
- f) **No Impact:** The proposed project will not impair the implementation nor physically interfere with an adopted emergency response plan or emergency evacuation plan. The parcel is located in an area classified with a

“High Fire Hazard” severity rating. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (Cal Fire) and the South Coast Fire Protection District for structural protection. Cal Fire responded stating that the project maintain a defensible space perimeter of 300 feet to protect it from wildland fire threats. South Coast Fire Protection District did not provide any comments on the project. Conditions of Approval, numbered 27 and 28 has been added to ensure compliance with recommendations provided by Cal Fire.

- g) **No Impact:** The proposed development consists of construction of a wireless communications tower and will not cause the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires than that existing at the site today.
- h) **Less Than Significant:** The project site is located within a high fire hazard area. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (Cal Fire) and the South Coast Fire Protection District for structural protection. The project application was referred to the Cal Fire for input. Cal Fire responded stating that the project maintain a defensible space perimeter of 300 feet to protect it from wildland fire threats. South Coast Fire Protection District did not provide any comments on the project. Conditions of Approval, numbered 28 and 29 have been added to ensure compliance with recommendations provided by Cal Fire

<u>XI. HYDROLOGY AND WATER QUALITY.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on or off site?				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact:** The proposed project will not violate any water quality standards or waste discharge requirements. The project application was referred to pertinent agencies for comment and no response was received expressing concerns with violation of water quality or waste discharge requirements. Therefore, there will be no impact as a result of the project.

b) **No Impact:** Mendocino County Coastal Element – Chapter 4.13, Sustainability Policy S-3, states new projects that create or replace 2,500 square feet or more of impervious area shall implement site design measures to reduce stormwater runoff and increase groundwater recharge. The proposed Project does not include development of a well or development of impervious surface coverage greater than 2,250 square feet. As such, the Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. No concern was expressed by the Mendocino County Division of Environmental Health as to potential for interference or depletion of groundwater supplies.

c) **Less Than Significant Impact:** There is an established natural surface drainage pattern within the project site. The project site will not create impervious surfaces in excess of 2,250 square feet, which would not significantly increase the amount of surface runoff. The proposed project will not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation or flooding on- or off-site. While the proposed new development under this application will require grading to accommodate it (approximately 49 cubic yards), the proposed grading activities will not alter existing drainage patterns.

The proposed project will not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. There are no existing or planned storm drainage systems that the proposed project would impact. Runoff from the site will not be significantly increased or polluted as there are minimal areas of impervious surface coverage or development proposed under the project. The proposed project would not result in any degradation of water quality within the vicinity of the project.

No stream or river alteration will result from the project, nor will the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site.

The project site is not mapped within a Flood Hazard zone and as such there would be no impact from the project in terms of placement of housing or other structures within a Flood Hazard zone. There is no levee or dam within proximity to the project site; therefore, the proposed project will not expose people or structures to any hazard associated with the failure of a levee or dam.

Therefore, there will be a less than significant impact.

d) **No Impact:** The site is not mapped to be located within a flood hazard, seiche, tsunami, or mudflow hazard area.

e) **No Impact:** The proposed project is not anticipated to create any pollutant discharges beyond those of existing use of the parcel. Therefore, the proposed project will not result in an increase in pollutant discharges to receiving waters. The proposed Project does not include septic facilities, or include any development that could substantially impact groundwater quality. Therefore, there will be no impact.

<u>XII. LAND USE AND PLANNING.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact:** The proposed development will be located on an existing parcel in a low density residential area and will not physically divide an established community.
- b) **No Impact:** Per Mendocino County Code Section 20.364.015(B), Major Impact Services and Utilities, the proposed project is in conformance with all local regulations. Conditions of approval 1-42 have been recommended to ensure that the proposed development is constructed in such a manner that any potential impacts are avoided.

<u>XIII. MINERAL RESOURCES.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a and b) **No Impact:** The County is the administrator of the California Surface Mining and Reclamation Act (SMARA). Therefore, all activities undertaken regarding this essentially non-renewable resource are subject to review and approval from the local jurisdiction. Mendocino County has many aggregate mineral resources, the demand for which varies. However, any negative impacts to either active mining activities or mining reclamation efforts would be required to be reviewed and approved by the County. There are no know mineral resources with the project area, nor are there delineated locally-important mineral resources within the project boundaries. Therefore, there will be no loss of availability of a known mineral resource or loss in locally-important mineral resource recovery sites.

<u>XIV. NOISE.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a and b) **Less Than Significant Impact:** Per the County General Plan, “Noise policies are intended to protect county communities from excessive noise generation from stationary and non-stationary sources. Land uses would be controlled to reduce potential for incompatible uses relative to noise. Residential and urban uses will be restricted near agriculture lands to prevent incompatible uses being placed near inherently noisy agricultural operations. Noise-sensitive environments, including schools, hospitals, and passive recreational use areas, would be protected from noise-generating uses. Structural development would

be required to include noise insulation and other methods of construction to reduce the extent of excessive noise.”⁴ The proposed wireless communications facility and associated generator, vehicular traffic, and grading proposed to accommodate the improvements may expose people to intermittent and temporary noises. Any noise or ground-borne vibration resulting from the project would not violate a local general plan or noise ordinance as all development within the Mendocino County Coastal Zone is subject to Exterior Noise Limit Standards specified in Appendix B of Title 20, Division II of Mendocino County Code. Therefore, potential impacts will be less than significant. A condition of approval, number 27 has been added to address any possible noise impacts.

- c) **No Impact:** The site is located within an airport zone (Zone D). Though the proposed project is approximately 0.5 miles west of a private airport, the project does not include residents or staff to remain on-site for extended periods of time and would therefore not subject people working in the project area to excessive noise levels.

Noise levels at the project site are not anticipated to permanently increase as a result of the proposed project. Noise during construction of new development may result in temporary impacts but will not be substantial as all development within the Mendocino County Coastal Zone is subject to Exterior Noise Limit Standards specified in Appendix B of Title 20, Division II of Mendocino County Code. Therefore there will be no impact as a result of the project.

<u>XVI. POPULATION AND HOUSING.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **No Impact:** The proposed project consists of construction of a wireless communications facility and associated internal access roads and related equipment. The proposed project will not induce substantial population growth as the project is not residential or commercial in nature nor does it extend major infrastructure that would induce population growth. Therefore, there will be no impact.
- b) **No Impact:** The proposed project does not displace any existing housing. The project does not displace any people and therefore would not necessitate construction of replacement housing elsewhere. Therefore, there will be no impact.

<u>XVII. PUBLIC SERVICES.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁴ Mendocino County General Plan, Page 3-10

Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Medical Services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **No Impact:** The proposed project will not result in adverse impacts associated with provision of governmental facilities or need for new or physically altered governmental facilities that may result in environmental impacts in order to maintain acceptable service ratios and response times for public services. The tower will be built to provide co-location opportunities for future carriers and/or public safety entities. As such, the project will benefit public services in the area.

Fire Protection: The parcel is located in an area classified with a “High Fire Hazard” severity rating. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (Cal Fire) and the South Coast Fire Protection District for structural protection. The project application was referred to the Cal Fire for input. Cal Fire responded stating that the project maintain a defensible space perimeter of 300 feet to protect it from wildland fire threats. South Coast Fire Protection District did not provide any comments on the project. Conditions of Approval, numbered 28 and 29 have been added to ensure compliance with recommendations provided by Cal Fire. South Coast Fire Protection District did not provide any comments on the project.

<u>XV. RECREATION.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b) **No Impact:** There is not a potential for increased usage of existing neighborhood parks and recreational facilities as a result of the proposed project as it is only proposing a wireless communication facility; not any residential uses. Therefore, there will be no increase in the use of existing neighborhood and regional parks and recreational facilities as a result of the project, and no recreational facilities are required that may adversely affect the environment.

<u>XVI. TRANSPORTATION/TRAFFIC.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) **No Impact:** The proposed project, which consists of construction of a new wireless communications facility and associated equipment, will not conflict with any plan, ordinance or policy that establishes measures of effectiveness for the performance of the circulation system. Additionally, the proposed project will not conflict with any applicable congestion management program. After construction is complete, maintenance workers are anticipated to visit the site approximately once per month. The State Route 1 Corridor Study Update provides traffic volume data for State Route 1. A 1994 Traffic Study found *“that under existing conditions, all intersections and road segments on Highway 1 in the Gualala commercial district were operating at “acceptable” levels of service (LOS) in 1994. The heaviest congestion and delays were experienced at the Sundstrom Mall entry/Highway 1 intersection, which operated at LOS D”*.⁵ According to Caltrans’ *Route Concept Report*, a level of service D is acceptable on rural road segments. Furthermore, the Traffic Study projected *“projected increases in traffic volumes on Highway 1 resulting from buildout of commercial and residential lands under the Gualala Town Plan (under the 75/50% Scenario) would degrade operations on Highway 1 from Old State Highway to Pacific Woods Road and at five intersections in the commercial district to a level of service F, which is unacceptable”*. As the proposed project is not in the Gualala Town Plan area, and is neither residential nor commercial, it will have no impact on local traffic.

b) **No Impact:** The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which states:

“(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant transportation impact.

(2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, a lead agency may tier from that analysis as provided in Section 15152.”

Although the proposed project is considered a land use project, the County of Mendocino has not established a threshold with regard to VMT impact significance consistent with CEQA Guidelines Section 15064.3, subdivision (b). Though an increase in traffic trips to the Site would be anticipated, especially during the construction phase, trips occurring once construction is completed will occur approximately once a month per carrier.

c) **No Impact:** The proposed project will not increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. This application proposes additional development that utilizes the existing access point onto Country Club Way (CR 514A), none of which will create a traffic hazard.

d) **Less Than Significant Impact:** The proposed project will not result in inadequate emergency access. The primary concern for emergency access in remote areas is for wildland fires. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (Cal Fire) and the South Coast Fire Protection District for structural protection. The project application was referred to Cal Fire for input. Cal Fire responded stating that the project maintain a defensible space perimeter of 300 feet to protect it from wildland fire threats. South Coast Fire Protection District did not provide any comments on the project. Conditions of Approval, numbered 28 and 29 has been added to ensure compliance with recommendations provided by Cal Fire.

⁵ County of Mendocino Coastal Element Section 4.14 – Gualala Town Plan

<u>XVII. TRIBAL CULTURAL RESOURCES.</u> Would the project 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, 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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b) **No Impact:** The Mendocino County Archaeological Commission accepted the submitted Cultural Resources Investigation prepared by EBI Engineering & Environmental Group, Inc. dated June 22, 2021 at its October 12, 2021 meeting and recommended that only the standard discovery clause condition be applied to the proposed project as no sites were identified in the Investigation. A Standard Condition, number 23 advises the property owner of the Discovery Clause, which prescribes the procedures subsequent to the discovery of any cultural resources during construction of the project.

Additionally, the project application was referred to various tribes that requested consultation on planning projects under Assembly Bill (AB) 52 and no additional comments or concerns were expressed by the tribes receiving the referral.

<u>XVIII. UTILITIES AND SERVICE SYSTEMS.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed ?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a and b) **No Impact:** The proposed project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board, as no wastewater will be generated from the proposed project. Additionally, the project will not require the construction of new or expanded water or wastewater treatment facilities, as there are no centralized systems that serve the site and the project does not require water or wastewater service.

c) **No Impact:** Storm water drainage is handled on-site and is generally just natural drainage of the site without improved storm water facilities. No new or expanded storm water drainage facilities are required as a result of the project that could cause a significant environmental effect.

d) **No Impact:** No water supply is necessary for the proposed project; therefore, water supplies are found to be sufficient and no new or expanded entitlements are needed.

e) **No Impact:** The project site is not served by a wastewater treatment provider and there is no district nearby that would feasibly be extending service to the parcel in the future. Additionally, no septic infrastructure is necessary to accommodate the proposed development. Curbside pick-up is available to the parcel. Additionally, the South Coast Transfer Station is located within 1.75± air miles of the project site and can accommodate the solid waste disposal needs of the site. No projected long-term increase in solid waste generation is anticipated as a result of the project, but there will be short-term increases associated with construction materials during construction of the proposed new development. Construction debris will be properly disposed of after completion of the proposed development. There will be no impact to capacity as a result of the project and the proposed project is in compliance with federal, state, and local statutes for solid waste disposal.

<u>XX. WILDFIRE</u> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

ongoing impacts to the environment?				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Less Than Significant:** There are no components of the project that would impair an adopted emergency response plan or emergency evaluation plan, including the adopted County EOP. The Site is located within the SRA and a “High Fire Hazard” severity zone. All project components would be required to be designed in accordance to state and local standards, including safety and emergency access requirements and CalFire’s Fire Safe Regulations. No comments of concern were received. CalFire considers any telecom facility “critical infrastructure. Conditions of approval numbers 28 and 29, requiring the requested defensible space, has been included.
- b) **Less Than Significant:** Under the proposed project, it is not anticipated that wildfire risks would be exacerbated due to slope, prevailing winds, and other factors. The Site is currently developed with one structure, is relatively flat, and primarily clear of vegetation. The project’s development will be limited to a 1,800 square foot area. Although proper precautions and measures would be taken during Site development, operation, and maintenance, the potential exists for wildland fire to inadvertently be ignited when equipment, primarily a backup generator, is utilized. The project would require compliance with any CalFire’s Fire Safe Regulations to ensure adequate fire protection measures and access.
- c) **Less Than Significant:** The Site is currently developed with one (1) residential structure and an accessory structure consisting of a barn. The proposed project would require the installation and maintenance of a wireless communication facility and associated infrastructure, including internal access roads and underground utility line (electricity) installation and connections. However, the developed footprint is not significant in size and during infrastructure installation and associated maintenance, appropriate Best Management Practices (BMPs) would be implemented.
- d) **Less Than Significant:** The proposed project would not 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 challenges, as the Site is located in a rural area with limited development.

<u>XVIV. MANDATORY FINDINGS OF SIGNIFICANCE.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) **Less Than Significant Impact:** Based on the discussion in Section IV Biological Resources and throughout the report, there is no evidence that the project has the potential to degrade the quality of the environment. Based on discussion in Section V Cultural Resources and throughout the report, there is no evidence to support a finding that the project would have the potential to eliminate important examples of the major periods of California history or prehistory.

- b) **No Impact:** The nearest wireless telecommunication facility that staff is aware of is located approximately 0.86± miles to the southwest of the project site near the intersection of Fish Rock Road (CR 122) and Rhododendron Road (CR 122B), addressed at 46440 Big Gulch Road. There are no impacts associated with the current project that become significant when considered in conjunction with other existing or planned facilities in the vicinity.

- c) **No Impact:** Staff is aware of public concerns regarding potential health effects based on environmental effects of radio frequency emissions from these types of wireless telecommunication facilities. The Federal Communications Commission (FCC) has set maximum permissible exposure limits for radio frequency transmitters, and the Telecommunications Act of 1996 prohibits local governments from regulating wireless service facilities based on environmental effects of radio frequency emissions as long as the facilities comply with FCC regulations for emissions. Additionally, the Applicant’s Electromagnetic Emissions Compliance Report states the site is fully compliant with all Federal regulations. At all locations on the ground, the maximum predicted power density level is less than one (1) percent of the FCC General Population Limits.

The wireless communications facility will be within a compound that is surrounded by a locked chain link fence and is not in a location likely to be accessed by anyone other than maintenance personnel. Appropriate signage will be posted disclosing that the facility is not to be accessed by anyone other than maintenance personnel.