Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

Mitigated Negative Declaration

Pursuant to Title 14, Division 6, Chapter 3, Article 6, Sections 15070 and 15071 of the California Code of Regulations and pursuant to the Procedures for Preparation and Processing of Environmental Documents adopted by the County of Sacramento pursuant to Sacramento County Ordinance No. SCC-116, the Environmental Coordinator of Sacramento County, State of California, does prepare, make, declare, publish, and cause to be filed with the County Clerk of Sacramento County, State of California, this Mitigated Negative Declaration re: The Project described as follows:

1. **Control Number:** PLNP2023-00004

2. **Title and Short Description of Project:** Early Times Wireless Communications Facility

The project is a request for the following entitlements from the County of Sacramento:

1. A Conditional Use Permit to allow a 130-foot-tall monopole wireless communication facility on an AG-80 zoned parcel.
2. A Design Review to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

The applicant proposes a new 130-foot Wireless Communication Facility (WCF) monopole tower and a 40ft-by-40ft lease area to include a fenced concrete pad for ground equipment, to be in the southwest portion of the subject parcel. A 20-foot-wide access road will provide access to the tower pad.

3. **Assessor's Parcel Number:** 126-0300-055-0000

4. **Location of Project:** The subject parcel is located at 12415 Fig Road, approximately 4,000 feet northwest of Dillard Road, in the Cosumnes Community of unincorporated Sacramento County.

5. **Project Applicant:** Assurance Realty obo Vertical Bridge

6. Said project will not have a significant effect on the environment for the following reasons:
   a. It will not 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.
   b. It will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.
   c. It will not have impacts, which are individually limited, but cumulatively considerable.
   d. It will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

7. As a result thereof, the preparation of an environmental impact report pursuant to the California Environmental Quality Act (Division 13 of the Public Resources Code of the State of California) is not required.

8. The attached Initial Study has been prepared by the Sacramento County Office of Planning and Environmental Review in support of this Mitigated Negative Declaration. Further information may be obtained by contacting the Office of Planning and Environmental Review at 827 Seventh Street, Room 225, Sacramento, California, 95814, or phone (916) 874-6141.

Julie Newton

Julie Newton
Environmental Coordinator
County of Sacramento, State of California

COUNTY OF SACRAMENTO
PLANNING AND ENVIRONMENTAL REVIEW
INITIAL STUDY

PROJECT INFORMATION

CONTROL NUMBER: PLNP2023-00004

NAME: Early Times Wireless Communications Facility

LOCATION: The subject parcel is located at 12415 Fig Road, approximately 4,000 feet northwest of Dillard Road, in the Cosumnes Community of unincorporated Sacramento County.

ASSESSOR'S PARCEL NUMBER: 126-0300-055-0000

APPLICANT:
Assurance Reality obo Vertical Bridge
1499 Huntington Dr. Suite 305
South Pasadena, CA, 91030
Attention: Melissa Keith

OWNER:
Suzanne Schell
16182 Whitecap Ln.
Huntington Beach, CA 92649

PROJECT DESCRIPTION

The project is a request for the following entitlements from the County of Sacramento:

1. A Conditional Use Permit to allow a 130-foot-tall monopole wireless communication facility on an AG-80 zoned parcel.
2. A Design Review to determine substantial compliance with the Sacramento County Countywide Design Guidelines (Design Guidelines).

The applicant proposes a new 130-foot Wireless Communication Facility (WCF) monopole tower and a 40ft-by-40ft lease area to include a fenced concrete pad for ground equipment, to be in the southwest portion of the subject parcel. A 20-foot-wide access road will provide access to the tower pad. The project site will include a diesel-powered back up power generator for emergency use.

ENVIRONMENTAL SETTING

The subject parcel is a 110.55 acre and zoned Agriculture-80 (Plate IS-1). The project site is a 40ft-by-40ft site in the southwest portion of the parcel. The surrounding parcels are agricultural zoned parcels of varying sizes with agriculture being the dominant land use. The Laguna Del Sol Special Planning Area (SPA) is to the northeast of the project site. There is a residential home on the adjacent property to the southeast that is approximately 130 feet away from the proposed facility.

A Perpetual Conservation Easement Grant dated October 16, 2002, was removed under a Quitclaim Dee dated May 27, 2013, and is no longer in force. The area of the proposed wireless facility will not interfere with any remaining conservation easements on the property. The remaining conservation easements include:

- Conservation Easement dated November 1,4,201,1, by Conservation Resources, LLC in favor of Environmental Stewardship Foundation (Cosumnes River preserve)
- Conservation/wetland Restoration Easement dated September 12, 2014, by River Ranch Oaks, LLC in favor of Conservancy to protect the Land
- Swainson's Hawk Conservation Easement dated August 26, 2016, by River Ranch Oaks, LLC in favor of Conservancy to protect the Land

ENVIRONMENTAL EFFECTS

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed an Initial Study Checklist (located at the end of this report). The Checklist identifies a range of potential significant effects by topical area. The topical discussions that follow are provided only when additional analysis beyond the Checklist is warranted.

Plate IS-1: Project Overview Map

Plate IS-2: Zoning

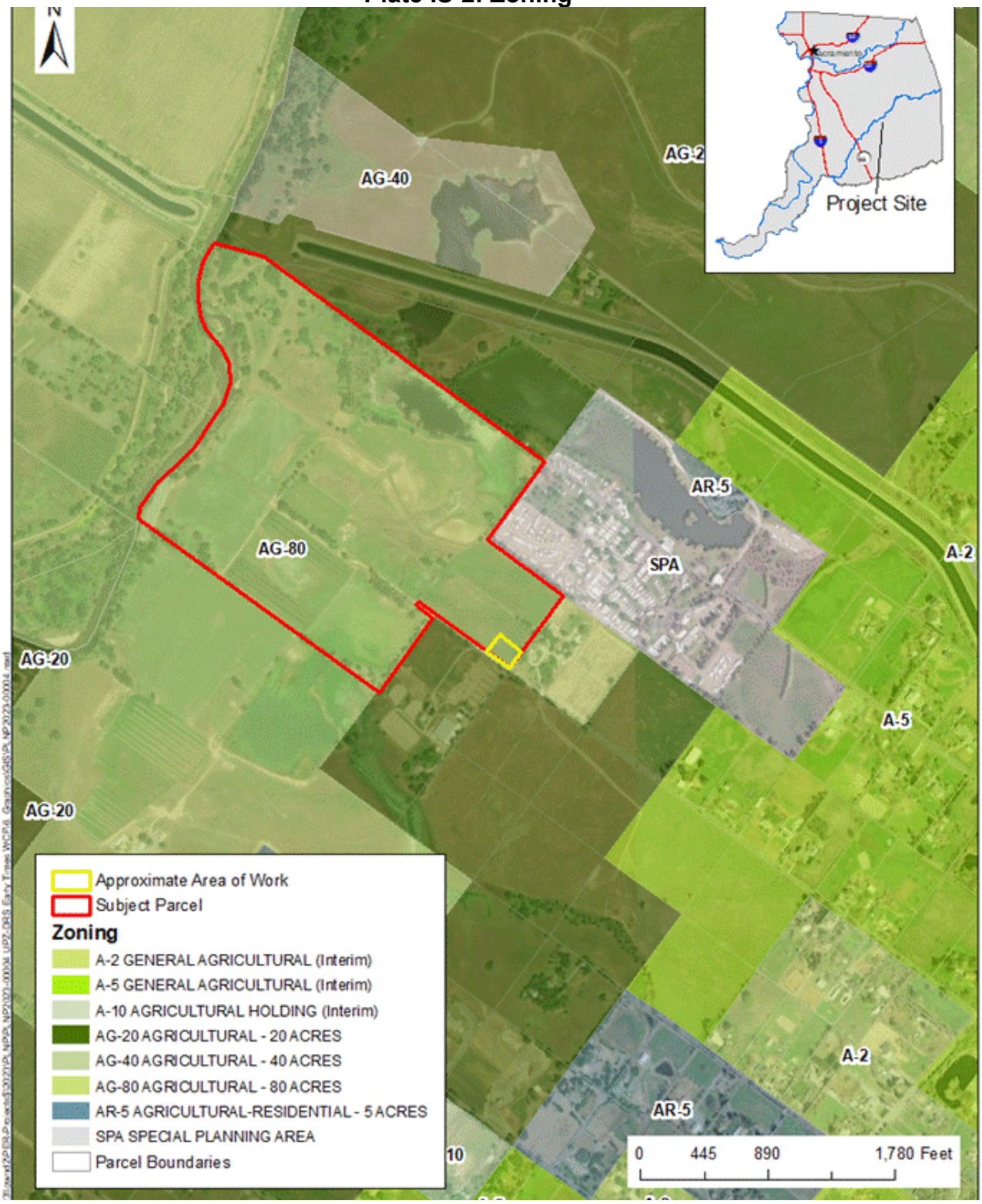


Plate IS-3: Site Plan

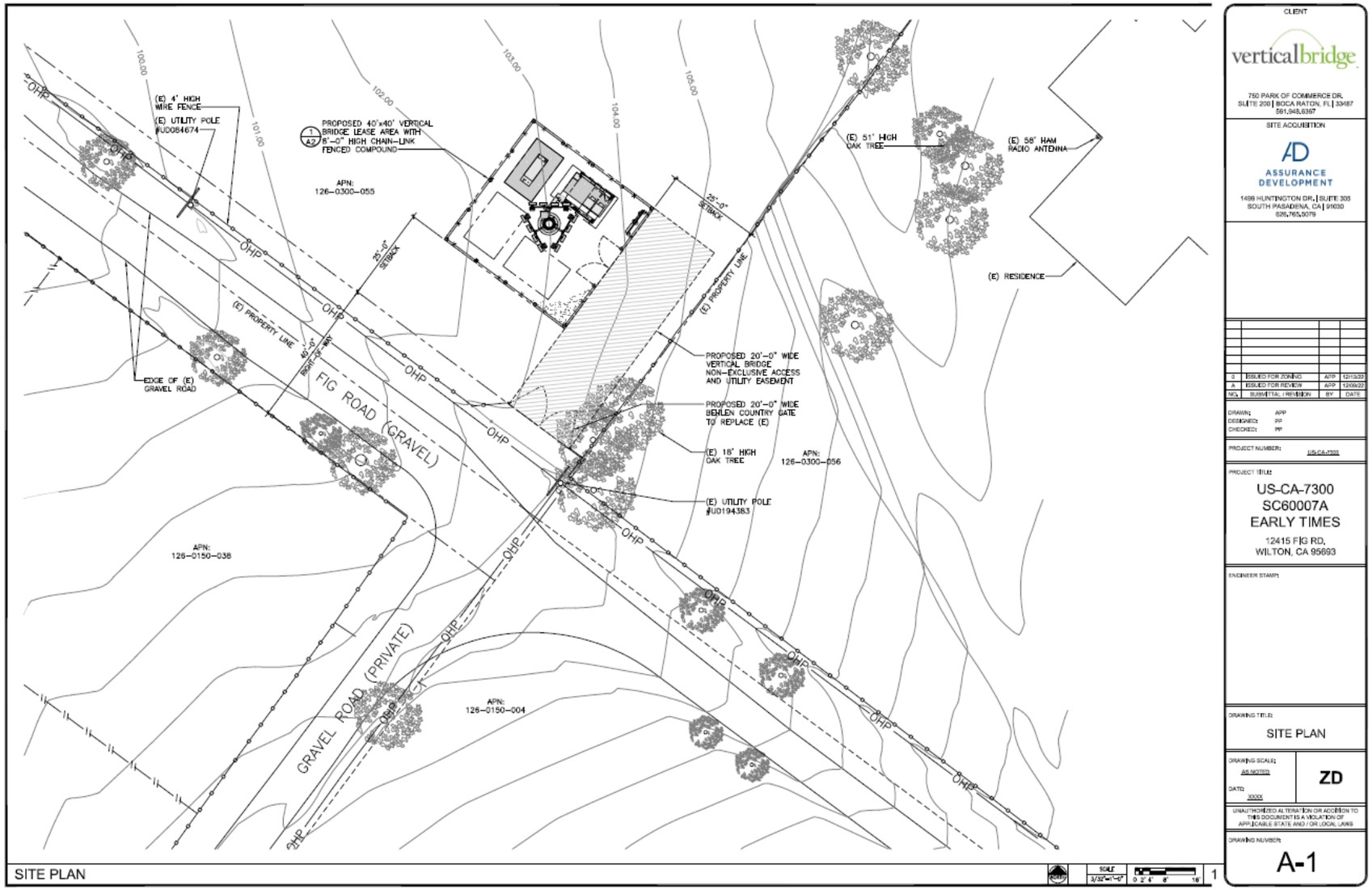
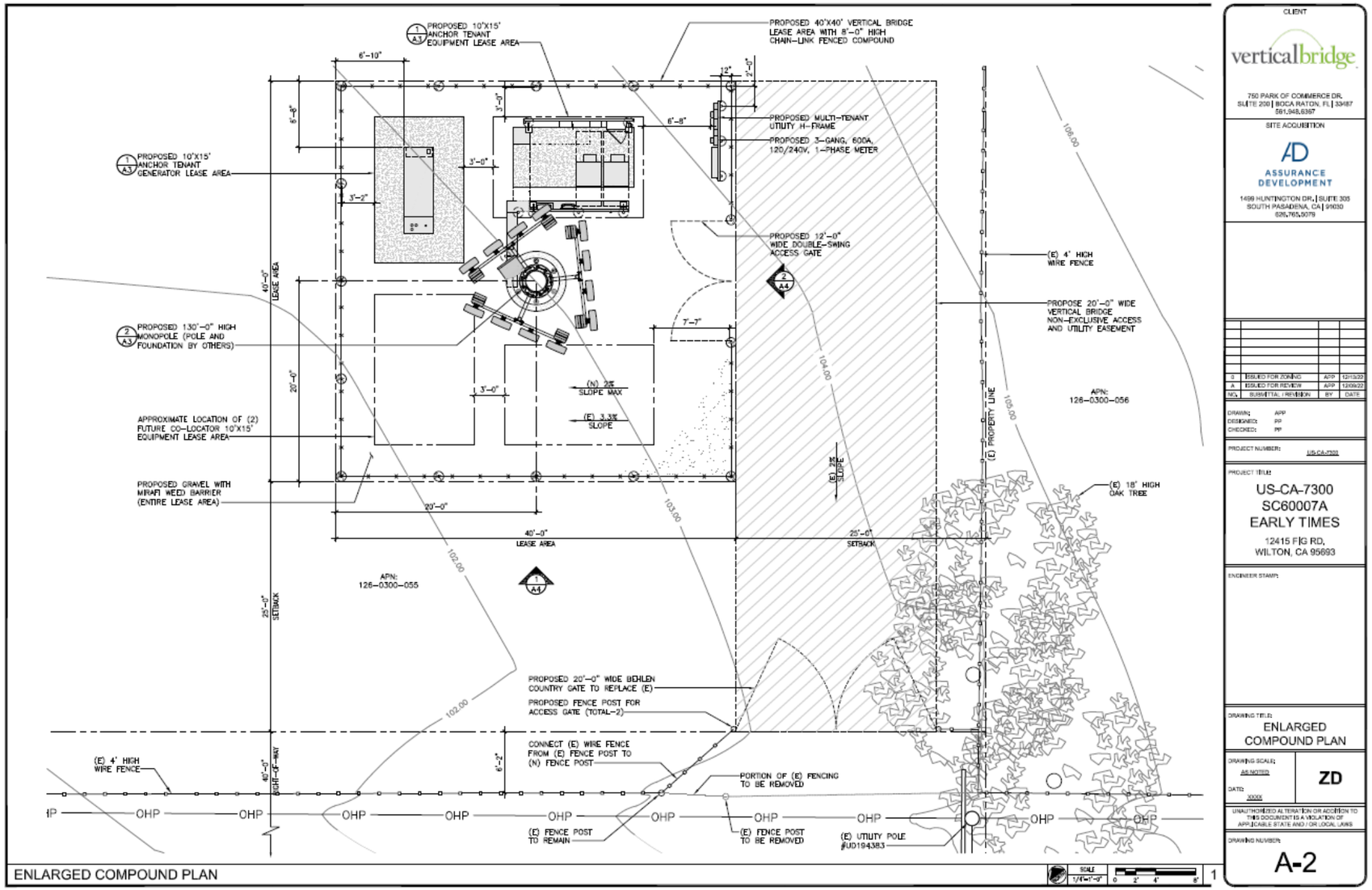


Plate IS-4: Enlarged Compound Plan



CLIENT

vertical bridge

750 PARK OF COMMERCE DR. SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

SITE ACQUISITION

ASSURANCE DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.9079

NO.	SUBMITTAL / REVISION	BY	DATE
0	ISSUED FOR ZONING	APP	12/13/22
A	ISSUED FOR REVIEW	APP	12/09/22

DRAWN: APP
DESIGNED: PP
CHECKED: PP

PROJECT NUMBER: US-CA-7300

PROJECT TITLE:
US-CA-7300
SC60007A
EARLY TIMES
12415 FIG RD,
WILTON, CA 95693

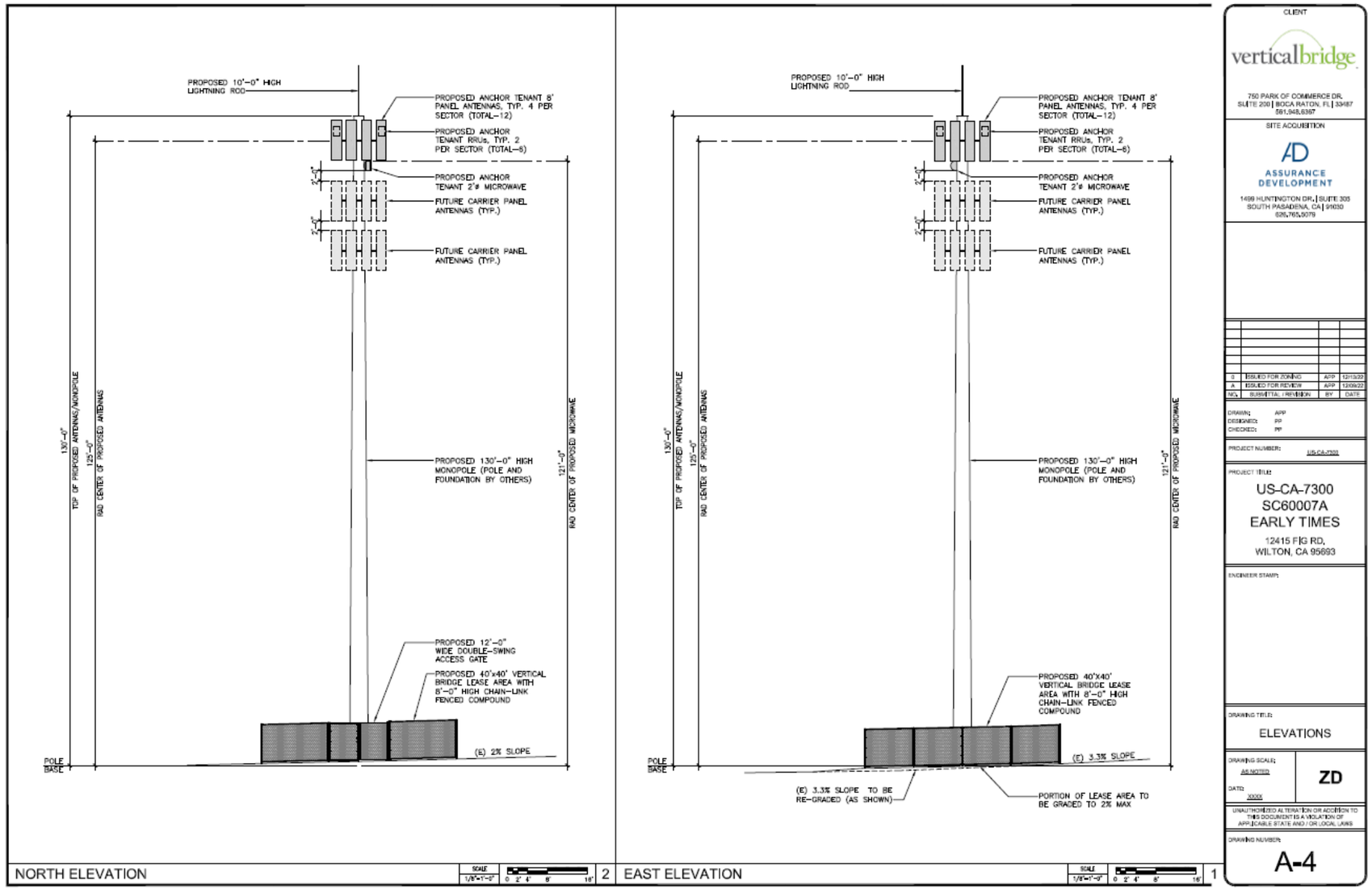
ENGINEER STAMP:

DRAWING TITLE:
ENLARGED COMPOUND PLAN

DRAWING SCALE: AS NOTED
ZD
DATE: XX/XX/XX

DRAWING NUMBER:
A-2

Plate IS-5: Proposed Elevations of Monopole



AESTHETICS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Substantially degrade the existing visual character or quality of the site and its surroundings.

The degree of impact of a project, either negative or beneficial, to the visual character of the area is largely subjective. Few objective or quantitative standards are available to analyze visual quality, and individual viewers respond differently to changes in the physical environment.

The 130-foot-tall monopole would be visible from the nearby residential properties. Under CEQA, an evaluation of a project's potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Therefore, the analysis focuses on the potential of the project to substantially degrade visual character from public viewpoints. The property is not located on a State Scenic Highway and the general vicinity does not contain a scenic vista.

Photo simulations of the project can be found in Plates IS-7 through IS-14. The equipment shelter will be located within a 40' x 40' lease area, behind a 6-foot-high chain link fence. The proposed project is located in a rural environment along Fig Road

The monopole would be most visible from the house adjacent to the project site, as well as other residences in the immediate vicinity. Additionally, the tower would be visible from the nearby Laguna Del Sol Community. Under CEQA, an evaluation of a project's potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Therefore, the analysis focuses on the potential of the project to substantially degrade visual character from public viewpoints. The property is not located on a State Scenic Highway and the general vicinity does not contain a scenic vista.

The nearest publicly visible location would be from motorists traveling along Fig Road. Fig Road is a rural road that serves a handful of residences, and therefore the total number of individuals affected by the changed landscape would be lower than if the facility was located on a more heavily traveled road. The nearest heavily traveled cross-road is Dillard Road, which is approximately 0.8 miles south of the project site. The proposed project will not have a substantial adverse effect on the existing visual character of the area. The project is consistent with policies governing scenic resources and has been found consistent with objective County design standards. Impacts associated with aesthetics are ***less than significant***.

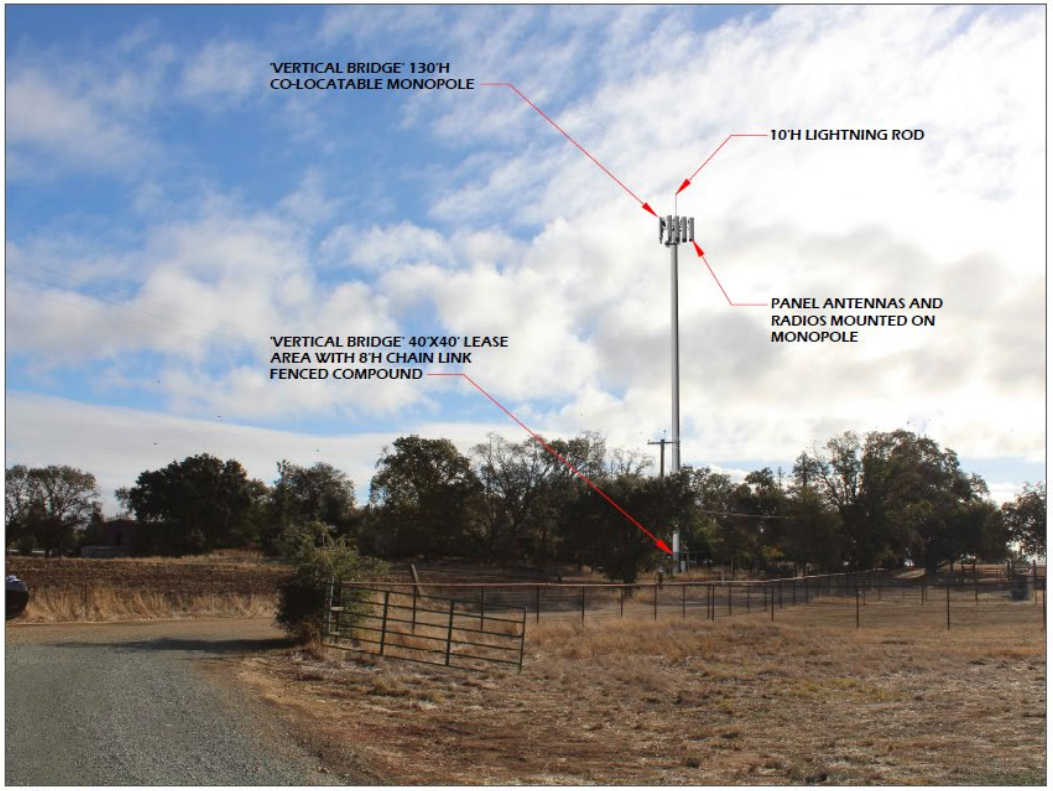
Plate IS-7 - Photo Simulation

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2022

EXISTING

PROPOSED



DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/22	ISSUED FOR SUBMITTAL	JFY
1	01/04/23	ISSUED FOR SUBMITTAL	JFY

verticalbridge

US-CA-7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
A	1/3

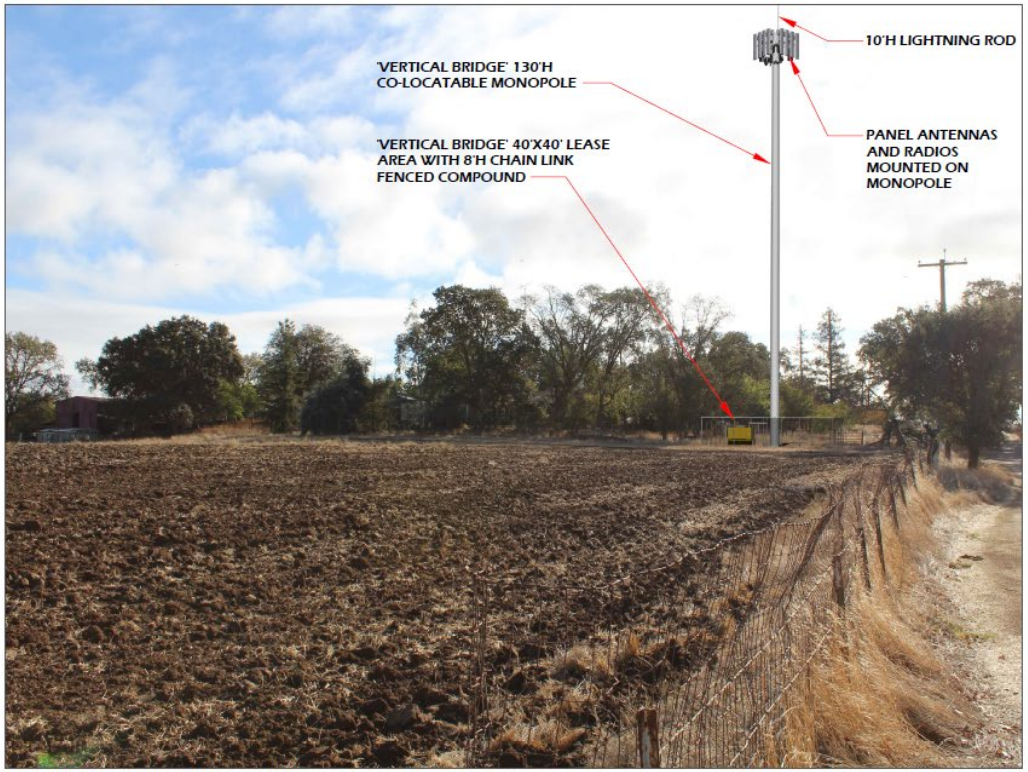
Plate IS-8 - Photo Simulation

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2022

EXISTING

PROPOSED



DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/22	ISSUED FOR SUBMITTAL	JFY
1	01/04/23	ISSUED FOR SUBMITTAL	JFY

verticalbridge

US-CA-7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
B	2 / 3

Plate IS-9 - Photo Simulation

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2022

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/22	ISSUED FOR SUBMITTAL	JFY
1	01/04/23	ISSUED FOR SUBMITTAL	JFY

verticalbridge

US-CA-7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
C	3 / 3

Plate IS-10 - Photo Simulation

SUPPLEMENTAL PHOTO SIMULATION

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2023

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/23	ISSUED FOR SUBMITTAL	JFY
1	03/23/23	SUPPLEMENTAL SIMS	JFY

verticalbridge

US-CA7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
A	1/3

Plate IS-11 - Photo Simulation

SUPPLEMENTAL PHOTO SIMULATION

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2023

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/23	ISSUED FOR SUBMITTAL	JFY
1	03/23/23	SUPPLEMENTAL SIMS	JFY

verticalbridge

US-CA7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
B	2/3

Plate IS-12 - Photo Simulation

SUPPLEMENTAL PHOTO SIMULATION

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2023

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/23	ISSUED FOR SUBMITTAL	JFY
1	03/23/23	SUPPLEMENTAL SIMS	JFY

verticalbridge

US-CA7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
C	3 / 3

Plate IS-13 - Photo Simulation

SUPPLEMENTAL PHOTO SIMULATION

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2023

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/23	ISSUED FOR SUBMITTAL	JFY
1	03/23/23	SUPPLEMENTAL SIMS	JFY
2	05/23/23	SUPPLEMENTAL SIMS #2	JFY

verticalbridge

US-CA7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
A	1 / 2

Plate IS-14 - Photo Simulation

SUPPLEMENTAL PHOTO SIMULATION

AERIAL MAP

COPYRIGHT: GOOGLE MAPS, 2023

EXISTING

PROPOSED

DISCLAIMER: THIS IS A RENDERING REPRESENTATION OF THE PROPOSED PROJECT ONLY

PHOTO PROVIDED BY: ASSURANCE DEVELOPMENT

DRAFTLINK

ASSURANCE DEVELOPMENT

NO.	DATE	REVISIONS	BY
0	12/23/23	ISSUED FOR SUBMITTAL	JFY
1	03/23/23	SUPPLEMENTAL SIMS	JFY
2	05/23/23	SUPPLEMENTAL SIMS #2	JFY

verticalbridge

US-CA7300
EARLY TIMES
12415 FIG ROAD
WILTON, CA 95693

VIEW	SHEET
B	2 / 2

HYDROLOGY AND WATER QUALITY

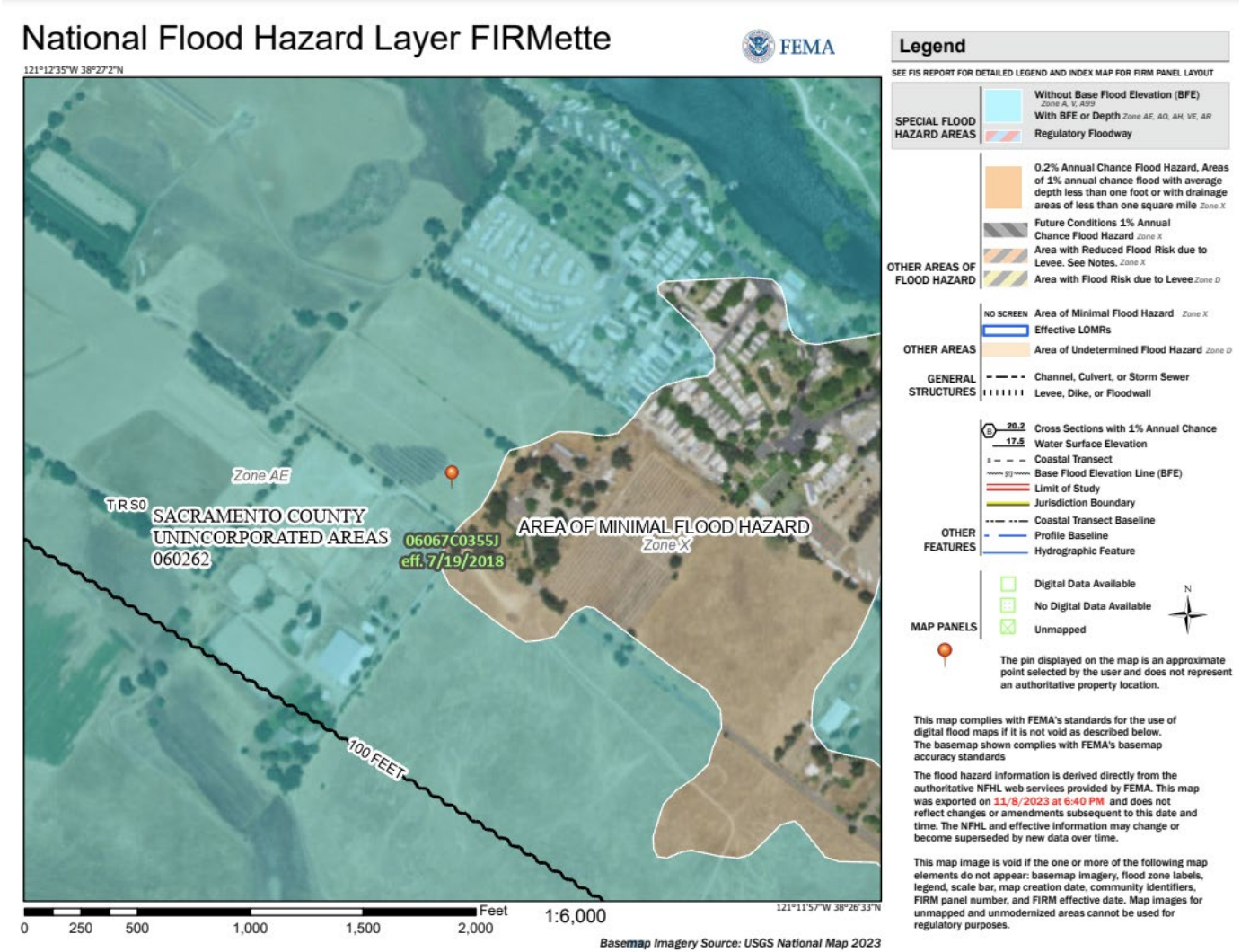
This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site.
- Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area.
- Place structures that would impede or redirect flood flows within a 100-year floodplain.
- Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
- Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.
- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

FLOODPLAIN

The project site is located south of the Consumnes River in the Federal Emergency Management Agency (FEMA) 100-year floodplain, Flood Zone AE (flood map number 06067C0355J See Plate IS-15). The County's Floodplain Management Ordinance sets provisions for all projects that may result in an adverse impact to the floodplain, including all structures meet the minimum requirements for flood elevation and levee setbacks, as applicable. Prior to building permit issuance, the structure will be required to meet minimum floor elevation, utilize flood resistant materials, and comply all applicable provisions of the Floodplain Management Ordinance, Sacramento County Water Agency Code and Sacramento County Improvement Standards. With compliance, impacts to hydrology, drainage and flooding would be ***less than significant.***

Plate IS-15 - FEMA Map



WATER QUALITY

CONSTRUCTION WATER QUALITY: EROSION AND GRADING

Construction on undeveloped land exposes bare soil, which can be mobilized by rain or wind and displaced into waterways or become an air pollutant. Construction equipment can also track mud and dirt onto roadways, where rains will wash the sediment into storm drains and thence into surface waters. After construction is complete, various other pollutants generated by site use can also be washed into local waterways. These pollutants include, but are not limited to, vehicle fluids, heavy metals deposited by vehicles, and pesticides or fertilizers used in landscaping.

Sacramento County has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by the Regional Water Board. The Municipal Stormwater Permit requires the County to reduce pollutants in stormwater discharges to the maximum extent practicable and to effectively prohibit non-stormwater discharges. The County complies with this permit in part by developing and enforcing ordinances and requirements to reduce the discharge of sediments and other pollutants in runoff from newly developing and redeveloping areas of the County.

The County has established a Stormwater Ordinance (Sacramento County Code 15.12). The Stormwater Ordinance prohibits the discharge of unauthorized non-stormwater to the County's stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. In addition, Sacramento County Code 16.44 (Land Grading and Erosion Control) requires private construction sites disturbing one or more acres or moving 350 cubic yards or more of earthen material to obtain a grading permit. To obtain a grading permit, project proponents must prepare and submit for approval an Erosion and Sediment Control (ESC) Plan describing erosion and sediment control best management practices (BMPs) that will be implemented during construction to prevent sediment from leaving the site and entering the County's storm drain system or local receiving waters. Construction projects not subject to SCC 16.44 are subject to the Stormwater Ordinance (SCC 15.12) described above.

In addition to complying with the County's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities (CGP). CGP coverage is issued by the State Water Resources Control Board (State Board) http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml and enforced by the Regional Water Board. Coverage is obtained by submitting a Notice of Intent (NOI) to the State Board prior to construction and verified by receiving a WDID#. The CGP requires preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector.

Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure

sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

The project must include an effective combination of erosion, sediment and other pollution control BMPs in compliance with the County ordinances and the State's CGP.

Erosion controls should always be the *first line of defense*, to keep soil from being mobilized in wind and water. Examples include stabilized construction entrances, tackified mulch, 3-step hydroseeding, spray-on soil stabilizers and anchored blankets. Sediment controls are the *second line of defense*; they help to filter sediment out of runoff before it reaches the storm drains and local waterways. Examples include rock bags to protect storm drain inlets, staked or weighted straw wattles/fiber rolls, and silt fences.

In addition to erosion and sediment controls, the project must have BMPs in place to keep other construction-related wastes and pollutants out of the storm drains. Such practices include but are not limited to: filtering water from dewatering operations, providing proper washout areas for concrete trucks and stucco/paint contractors, containing wastes, managing portable toilets properly, and dry sweeping instead of washing down dirty pavement.

It is the responsibility of the project proponent to verify that the proposed BMPs for the project are appropriate for the unique site conditions, including topography, soil type and anticipated volumes of water entering and leaving the site during the construction phase. In particular, the project proponent should check for the presence of colloidal clay soils on the site. Experience has shown that these soils do not settle out with conventional sedimentation and filtration BMPs. The project proponent may wish to conduct settling column tests in addition to other soils testing on the site, to ascertain whether conventional BMPs will work for the project.

If sediment-laden or otherwise polluted runoff discharges from the construction site are found to impact the County's storm drain system and/or Waters of the State, the property owner will be subject to enforcement action and possible fines by the County and the Regional Water Board.

Project compliance with requirements outlined above, as administered by the County and the Regional Water Board will ensure that project-related erosion and pollution impacts are ***less than significant.***

Biological Resources

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species.

NATIVE TREES

Sacramento County has identified the value of its native and landmark trees and has adopted measures for their preservation. The Tree Ordinance (Chapter 19.04 and 19.12 of the County Code) provides protections for landmark trees and heritage trees. The County Code defines a landmark tree as "an especially prominent or stately tree on any land in Sacramento County, including privately owned land" and a heritage tree as "native oak trees that are at or over 19" diameter at breast height (dbh)." Chapter 19.12 of the County Code, titled Tree Preservation and Protection, defines native oak trees as valley oak (*Quercus lobata*), interior live oak (*Quercus wislizenii*), blue oak (*Quercus douglasii*), or oracle oak (Quercus morehus) and states that "it shall be the policy of the County to preserve all trees possible through its development review process." It should be noted that to be considered a tree, as opposed to a seedling or sapling, the tree must have a diameter at breast height (dbh) of at least 6 inches or, if it has multiple trunks of less than 6 inches each, a combined dbh of 10 inches. The Sacramento County General Plan Conservation Element policies CO-138 and CO-139 also provide protections for native trees:

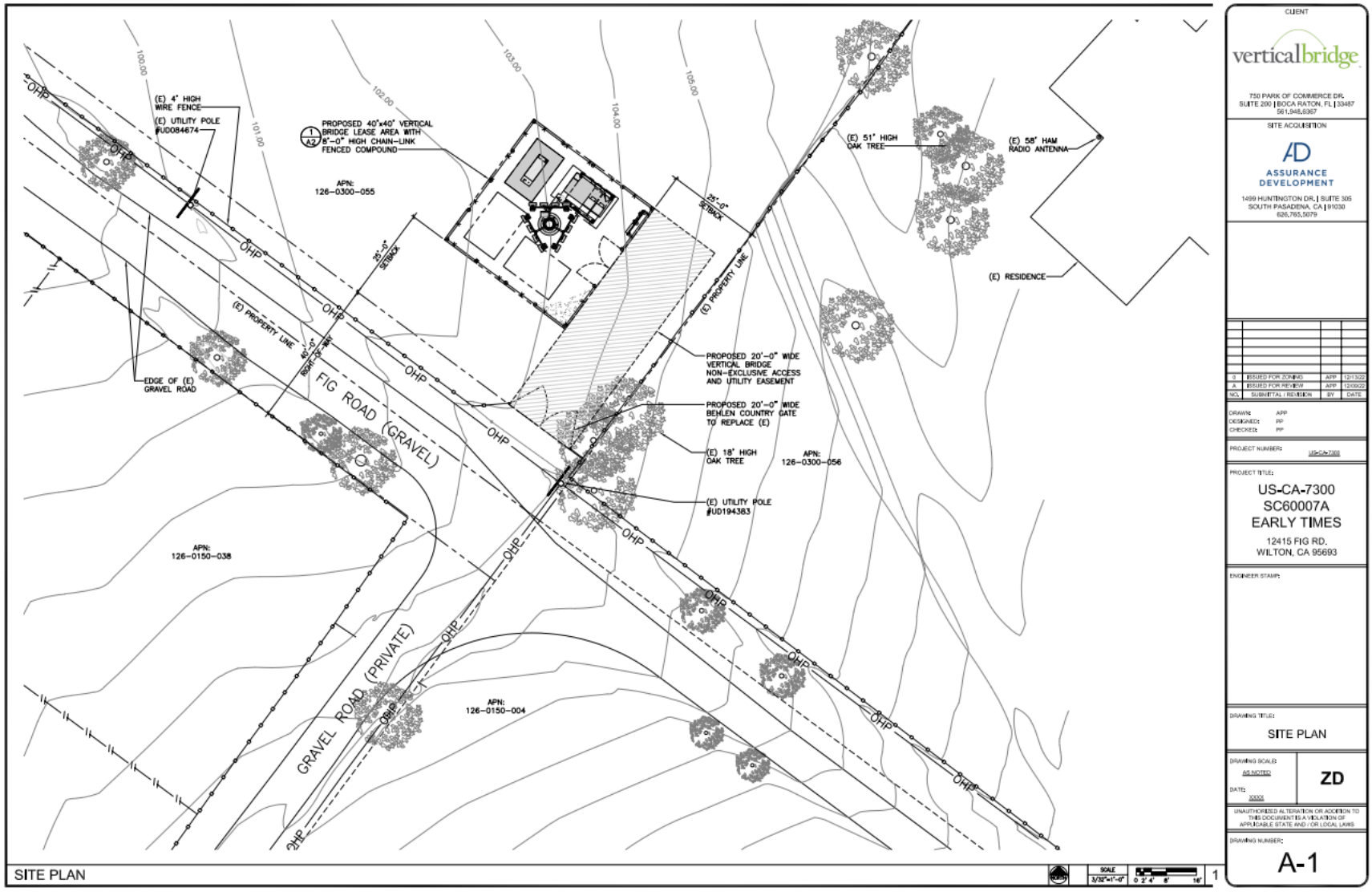
> CO-138. Protect and preserve non-oak native trees along riparian areas if used by Swainson's Hawk, as well as landmark and native oak trees measuring a minimum of 6 inches in diameter or 10 inches aggregate for multi-trunk trees at 4.5 feet above ground.
>
> CO-139. Native trees other than oaks, which cannot be protected through development, shall be replaced with in-kind species in accordance with established tree planting specifications, the combined diameter of which shall equal the combined diameter of the trees removed.

Native trees other than oaks include Fremont cottonwood (Populus *fremontii*), California sycamore (*Platanus racemosa*), California black walnut (Juglans californica), Oregon ash (*Fraxinus latifolia*), western redbud (*Cercis occidentalis*), gray pine (*Pinus sabiniana*), California white alder (*Alnus rhombifolia*), boxelder (*Acer negundo*), California buckeye (*Aesculus californica*), narrowleaf willow (*Salix exigua*), Gooding's willow (*Salix gooddingii*), red willow (*Salix laevigata*), arroyo willow (*Salix lasiolepis*), shining willow (*Salix lucida*), Pacific willow (*Salix lasiandra*), and dusky willow (*Salix melanopsis*).

PROJECT ANALYSIS – NATIVE TREES

The project site has one native oak tree located along the proposed access road to the WCF lease area (Plate IS-16). The access road will encroach on the dripline of the tree. However, the parcel is currently used for agricultural purposes and recent aerial imagery shows evidence of agricultural machinery, such as tractors and shredders, operating within the oak drip lines. No significant grading is proposed in the vicinity of the existing tower, and the project proposal will not cause additional impacts within the oak dripline area. Impacts to native trees would be ***less than significant*.**

Plate IS-16 Access Road Oak Tree Dripline encroachment



Special Status Species

Species considered for presence are those species with modeled habitat identified in the SSHCP and species considered to be potentially present as indicated on the official USFWS species list and CNDDB quad list. This is the basis for species outlined in Table IS-1, which reports the likelihood of species occurrence based on habitat presence either on the site or in proximity of the site, survey results (if any), and nearby recorded species occurrences. Likelihood of occurrence is rated as Not Present, Low Potential, Moderate Potential, High Potential, or Present, which are defined as:

Not Present: A survey was performed by a qualified biologist, and the species was not found, and habitat is absent both on the site and in the vicinity.

Low Potential: Habitat is near-absent.

Moderate Potential: Habitat is present, but the species has not been observed within five miles of the site.

High Potential: Habitat is present, and the species has been observed within five miles of the site.

Present: The CNDDB contains a recorded occurrence on the site, or the species was found during site-specific surveys.

Species which are not present or were found to have a low potential of occurrence are not discussed further in subsequent analysis sections.

Table IS-1: Potential for Special Status Species Occurrence

Species	Status[1]	Habitat[1]	Potential for Occurrence
BIRDS			
Bank Swallow *Riparia riparia*	ST	Requires vertical banks and cliffs with fine-textured or sandy soils near streams, rivers, ponds, lakes, and the ocean for nesting. Feeds primarily over grassland, shrubland, savannah, and open riparian areas.	None. The project site does not contain appropriate nesting habitat for the species. The project site is 0.5 mile away from the bank of the Cosumnes River.
Burrowing Owl *Athene cunicularia hypugea*	CSC SSHCP	Frequents open grasslands and shrublands with perches and burrows. Nests and roosts in old burrows of small mammals and rubble piles.	None. The project site is actively mowed.
Cooper's Hawk *Accipiter cooperii*	SA SSHCP	Frequents landscapes with wooded patches and groves, along with woodland edge habitats. Nests in riparian areas.	High. The Project site contains appropriate nesting habitat for the species
Swainson's Hawk *Buteo swainsoni*	ST SSHCP	Breeds in stands with few trees in juniper-sage flats, riparian areas, and oak savannah. Requires adjacent suitable foraging areas such as grasslands or grain fields supporting rodent populations.	High: Suitable foraging habitat present. Suitable nesting habitat is present within the Project site.. The nearest CNDDB occurrence is 0.65 miles to the northwest of the project site.
Tricolored Blackbird *Agelaius tricolor*	CSC SSHCP	The species is listed for breeding habitat. Known to nest near marshes in large (several hundred to several thousand birds) breeding colonies in habitat made up of blackberry thickets, bulrush (*Scrirpus* sp.) or cattails (*Typha* sp.) patches.	None: No suitable habitat in the Project area.
White-Tailed Kite *Elanus leucurus*	CFP, SA SSHCP	Inhabit low-elevation grasslands, wetlands dominated by grasses, oak woodlands, and agricultural and riparian areas. The species is listed for nesting.	High. Suitable foraging and nesting habitat present within Project area. The nearest CNDDB occurrence is 2.6 miles to the east of the Project area.
AMPHIBIANS			
California Tiger Salamander *Ambystoma californiense*	FT ST SSHCP	Endemic to annual grasslands and valley-foothill habitats in California. Adults spend most time in subterranean refugia, particularly in ground squirrel burrows. Seasonal ponds or vernal pools are required for breeding.	None. The project area is not within this species' historic range. There are no documented occurrences of this species within 10 miles of the Project area.

Western Spadefoot Toad *Scaphiopus (Spea) hammondii*	CSC SSHCP	Occurs primarily in grasslands but occasionally populates valley-foothill hardwood woodlands. Almost entirely terrestrial, but requires temporary rain pools that lack predators (fish, bullfrogs, crayfish) for breeding. Also needs burrows for refuge.	None: No suitable habitat in the Project area.
FISH			
Central Valley Steelhead *Oncorhynchus mykiss*	FT	Most of Sacramento County is within the distinct population segment area for this species. Critical habitat has been designated within Sacramento County on the Sacramento River, American River, Mokelumne River, and Dry Creek (both north and south creeks). Spawning has been documented on the Cosumnes River. (NMFS 2009) The listing applies to the Sacramento and San Joaquin Rivers and their tributaries.	None: Though the project site in on a parcel that shares a boundary with the Cosumnes River, the location of the cell tower will be constructed is over 300 feet away from the bank of the Cosumnes.
INVERTEBRATES			
California Linderiella *Linderiella occidentalis*	SA	A fairy shrimp which most often occupies pools that are vegetated and contain clear water. Not uncommon to observe the species in mud-bottomed pools with slightly turbid water.[2]	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Conservancy Fairy Shrimp *Branchinecta longiantenna*	FE	Typical habitat has been described as large, deep, turbid, playa-type vernal pools. Requires a somewhat longer inundation period (life cycle may be 46 days). [2]	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Midvalley Fairy Shrimp *Branchinecta mesovallensis*	SA SSHCP	Inhabit shallow vernal pools, vernal swales, and various artificial ephemeral wetland habitats in the Sacramento, Solano, Contra Costa, San Joaquin, Madera, Merced, and Fresno Counties. [2]	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Valley Elderberry Longhorn Beetle *Desmocerus californicus dimorphus*	FT SSHCP	Associated with mature elderberry (*Sambucus* spp.) trees/shrubs found in riparian forests in the Central Valley (USFWS, 1999).	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.

Vernal Pool Fairy Shrimp *Branchinecta lynchi*	FT SSHCP	Inhabit alkaline pools, ephemeral drainages, rock outcrop pools, ditches, stream oxbows, stockponds, vernal pools, vernal swales, and other seasonal wetlands. Also found in basalt flow depression pools in unplowed grasslands. [2]	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Vernal Pool Tadpole Shrimp *Lepidurus packardi*	FE SSHCP	Inhabits small to large vernal pools containing clear to highly turbid water. [2]	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
PLANTS			
Boggs Lake Hedge-Hyssop *Gratiola heterosepala*	SE, List 1B SSHCP	Marshes and swamps, vernal pools/clay; elevation 30 – 7,790 ft (blooms Apr. – Aug.)	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Legenere *Legenere limosa*	List 1B SSHCP	Vernal pools; elevation 0 – 2,900 ft (blooms Apr. – Jun.)	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Sacramento Orcutt Grass *Orcuttia viscida*	FE, SE, List 1B SSHCP	Vernal pools; elevation 100 – 330 ft (blooms Apr. – Jul.)	None: The parcel contains suitable habitat; However, the area where the tower will be constructed is approximately 700 feet away from any seasonal wetlands.
Sanford's Arrowhead *Sagittaria sanfordii*	List 1B SSHCP	Marshes and swamps; elevation 0 – 2,000 ft (blooms May – Oct.)	None: No suitable pond or marsh habitat within Project area.
Slender Orcutt Grass *Orcuttia tenuis*	FT, SE List 1B SSHCP	Vernal pools; elevation 115 – 5,775 ft (blooms May – Oct.)	None: No suitable habitat in the Project area.

Relevant species compiled from the California Dept. of Fish and Wildlife Natural Diversity Data Base (2011) and the U.S. Fish and Wildlife Species List for Sacramento County

1. Listing status sources and, unless otherwise specified, habitat description sources (life history accounts) are:

California Species: http://www.dfg.ca.gov/wildlife/nongame/list.html for the general webpage where you can use the links, or use the "search" field in the upper right-hand corner – for instance, enter "American Badger life history" – to obtain life history accounts. Most Bird Accounts are www.dfg.ca.gov/wildlife/nongame/ssc/birds.html, most Mammal Accounts are http://www.dfg.ca.gov/wildlife/nongame/publications/bm_research/docs/86_27.pdf and http://www.dfg.ca.gov/wildlife/nongame/ssc/1998mssc.html, most Fish Accounts are http://www.dfg.ca.gov/habcon/info/fish_ssc.pdf, and most reptile and amphibian accounts are http://www.dfg.ca.gov/wildlife/nongame/publications/docs/herp_ssc.pdf. Last accessed May, 2018.

Federal Species: http://www.fws.gov/sacramento/ES_Species/Accounts/Home/es_species.htm Last accessed May, 2018.

California Native Plant Society: http://www.rareplants.cnps.org/ Last accessed May, 2018.

2. United States Fish and Wildlife Service, "Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon", December 2005.

FE = Federal Endangered; FT = Federal Threatened; FC = Federal Candidate

SE = State of California Endangered; ST = State of California Threatened; CSC = State of California Species of Special Concern; CFP = State of California Fully Protected; SA = Special Animal

SSHCP = Species covered by the South Sacramento Habitat Conservation Plan

List 1B = California Native Plant Society Endangered, Threatened, or Rare in California

List 2 = California Native Plant Society Endangered, Threatened, or Rare in California but more common elsewhere

SWAINSON'S HAWK

The Swainson's hawk (*Buteo swainsoni*) is listed as a threatened species by the State of California and is a candidate for federal listing as threatened or endangered. It is a migratory raptor typically nesting in or near valley floor riparian habitats during spring and summer months. Swainson's hawks were once common throughout the state, but various habitat changes, including the loss of nesting habitat (trees) and the loss of foraging habitat through the conversion of native Central Valley grasslands to certain incompatible agricultural and urban uses has caused an estimated 90% decline in their population.

Swainson's hawks feed primarily upon small mammals, birds, and insects. Their typical foraging habitat includes native grasslands, alfalfa, and other hay crops that provide suitable habitat for small mammals. Certain other row crops and open habitats also provide some foraging habitat. The availability of productive foraging habitat near a Swainson's hawk's nest site is a critical requirement for nesting and fledgling success. In central California, about 85% of Swainson's hawk nests are within riparian forest or remnant riparian trees. CEQA analysis of impacts to Swainson's hawks consists of separate analyses of impacts to nesting habitat and foraging habitat.

The CEQA analysis provides a means by which to ascertain impacts to the Swainson's hawk. When the analysis identifies impacts, mitigation measures are established that will reduce impacts to the species to a less than significant level. Project proponents are cautioned that the mitigation measures are designed to reduce impacts and do not constitute an incidental take permit under the California Endangered Species Act (CESA). Anyone who directly or incidentally takes a Swainson's hawk, even when in compliance with mitigation measures established pursuant to CEQA, may violate the California Endangered Species Act.

SWAINSON'S HAWK NESTING IMPACTS

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, California Department of Fish and Wildlife (CDFW) recommends utilizing the methodology set forth in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). The document recommends that surveys be conducted for the two survey periods immediately prior to the start of construction. The five survey periods are defined by the timing of migration, courtship, and nesting in a typical year (refer to Table IS-2). Surveys should extend a ½-mile radius around all project activities, and if active nesting is identified, CDFW should be contacted.

Table IS-2: Recommended Survey Periods for Swainson's Hawk (TAC 2000)

Period #	Timeframe	# of surveys required	Notes
I.	Jan. 1 – Mar. 20	1	Optional, but recommended
II.	Mar. 20 – Apr. 5	3	
III.	Apr. 5 – Apr. 20	3	
IV.	Apr. 21 – June 10	N/A	Initiating surveys is not recommended during this period
V.	June 10 – July 30	3	

For example, if a project is scheduled to begin on June 20, three surveys should be completed in Period III and three surveys in Period V, as surveys should not be initiated in Period IV. It is always recommended that surveys be completed in Periods II, III and V.

The nearest Swainson's Hawk nest, according to the California Department of Fish and Wildlife Data Portal (CNDDB), is 0.35 miles away from the project site. There are suitable nesting trees along the perimeter of the project site parcel and in the vicinity. To avoid impacts to nesting raptors, mitigation involves pre-construction nesting surveys to identify any active nests and to implement avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact CDFW to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to Swainson's hawk will be ***less than significant***.

MIGRATORY NESTING BIRDS

The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(19) of the Federal Endangered Species Act defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or

chick(s) and is therefore considered "take." To avoid take of nesting migratory birds, mitigation has been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

Large trees in the project vicinity provide potential nesting habitat for migratory birds. To avoid take of nesting migratory birds, mitigation has been included either to require that activities occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded. Impacts to migratory birds are ***less than significant***.

NESTING BIRDS OF PREY

This section addresses raptors that are not listed as endangered, threatened, or of special concern, but are nonetheless afforded general protections by the Fish and Game Code. Raptors and their active nests are protected by the California Fish and Game Code Section 3503.5, which states: It is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey, or raptors) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto. Section 3(19) of the Federal Endangered Species Act defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." Thus, take may occur both as a result of cutting down a tree or as a result of activities nearby an active nest which cause nest abandonment.

Raptors within the Sacramento region include tree-nesting species such as the red-tailed hawk and red-shouldered hawk, as well as ground-nesting species such as the northern harrier. The following raptor species are identified as "special animals" due to concerns over nest disturbance: Cooper's hawk, sharp-shinned hawk, golden eagle, northern harrier, and white-tailed kite. The project site perimeter does contain trees that could provide suitable habitat for nesting birds of prey. Construction of the tower could cause nesting birds to be disturbed and could possibly abandon established nesting sites nearby.

To avoid impacts to nesting raptors, mitigation involves pre-construction nesting surveys to identify any active nests and to implement avoidance measures if nests are found – if construction will occur during the nesting season of March 1 to September 15. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting raptors, potentially resulting in nest abandonment or other harm to nesting success. If nests are found, the developer is required to contact CDFW to determine what measures need to be implemented in order to ensure that nesting raptors remain undisturbed. The measures selected will depend on many variables, including the distance of activities from the nest, the types of activities, and whether the landform between the nest and activities provides any kind of natural screening. If no active nests are found during the focused survey, no further mitigation will be required. Mitigation will ensure that impacts to nesting raptors will be ***less than significant***.

BURROWING OWL

According to the California Fish and Wildlife life history account for the species, burrowing owl (*Athene cunicularia*) habitat can be found in annual and perennial grasslands, deserts, and arid scrublands characterized by low-growing vegetation. Burrows are the essential component of burrowing owl habitat. Both natural and artificial burrows provide protection, shelter, and nesting sites for burrowing owls. Burrowing owls typically use burrows made by fossorial mammals, such as ground squirrels or badgers, but also use human-made structures such as cement culverts; cement, asphalt, or wood debris piles; or openings beneath cement or asphalt pavement. Burrowing owls are listed as a California Species of Special Concern due to loss of breeding habitat.

Burrowing owls may use a site for breeding, wintering, foraging, and/or migration stopovers. Breeding season is generally defined as spanning February 1 to August 31 and wintering from September 1 to January 31. Occupancy of suitable burrowing owl habitat can be verified at a site by detecting a burrowing owl, its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance. Burrowing owls exhibit high site fidelity, reusing burrows year after year.

According to the California Fish and Wildlife "Staff Report on Burrowing Owl Mitigation" (March 2012), surveys for burrowing owl should be conducted whenever suitable habitat is present within 500 feet of a proposed impact area; this is also consistent with the "Burrowing Owl Survey Protocol and Mitigation Guidelines" published by The California Burrowing Owl Consortium (April 1993). Occupancy of burrowing owl habitat is confirmed whenever one burrowing owl or burrowing owl sign has been observed at a burrow within the last three years.

The California Fish and Wildlife Staff Report on Burrowing Owl Mitigation indicates that the impact assessment should address the factors which could impact owls, the type and duration of disturbance, the timing and duration of the impact, and the significance of the impacts. The assessment should also take into account existing conditions, such as the visibility and likely sensitivity of the owls in question with respect to the disturbance area and any other environmental factors which may influence the degree to which an owl may be impacted (e.g. the availability of suitable habitat).

The project site contains open grassland. There could be suitable habitat for burrowing owls to use the site for breeding, burrowing, and foraging. Mitigation has been included in the form of preconstruction surveys to ensure that burrowing owl are not present within the construction footprint or the vicinity. Impacts to burrowing owls are ***less than significant***.

CULTURAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource?

- Have a substantial adverse effect on an archaeological resource?
- Disturb any human remains, including those interred outside of formal cemeteries?

A project that may cause a substantial adverse change in the significance of an historical resource, an archaeological resource, or the internment location of human remains is a project that may have a significant impact on the environment. The CEQA evaluation process defines historic resources as a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources (CRHR).

CULTURAL RESOURCES REGULATORY BACKGROUND

CALIFORNIA ENVIRONMENTAL QUALITY ACT

CEQA requires that impacts to Historical Resources be identified and, if the impacts will be significant, that mitigation measures to reduce the impacts be applied.

A Historical Resource is a resource that 1) is listed in or has been determined eligible for listing in the California Register of Historic Resources (CRHR) by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR, 2) is included in a local register of historical resources, as defined in Public Resources Code (PRC) 5020.1(k), or 3), and has been identified as significant in an historical resources survey, as defined in PRC 5024.1(g) (California Code of Regulations [CCR] Title 14, Section 15064.5(a)).

The eligibility criteria for the CRHR are as follows (CCR Title 14, Section 4852(b)):

(1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.

(2) It is associated with the lives of persons important to local, California, or national history.

(3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or.

(4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition, the resource must retain integrity which is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (CCR Title 14, Section 4852(c)). Resources that have been determined eligible for the NRHP are automatically eligible for the CRHR.

Impacts to a historical resource, as defined by CEQA (listed in an official historic inventory or survey or eligible for the CRHR), are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired (CCR Title 14, Section 15064.5(b)). Demolition or alteration of eligible buildings, structures, and features that they would no longer be eligible would result in a significant impact. The whole or partial destruction of eligible archaeological sites would result in a significant impact. In addition to impacts from destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed "visual impacts") of physical features in the project area could also result in significant impacts.

CALIFORNIA CODE: CONFIDENTIALITY AND DISCLOSURE

Sections 6253, 6254, and 6254.10 of the California Code authorize state agencies to exclude archaeological site information from public disclosure under the Public Records Act. In addition, the California Public Records Act (Government Code § 6250 et seq.) and California's open meeting laws (The Brown Act, Government Code § 54950 et seq.) protect the confidentiality of Native American cultural place information. Because the disclosure of information about the location of cultural resources is prohibited by the Archaeological Resources Protection Act of 1979 (16 U.S. Code 552 [USC] 470hh) and Section 307103 of the NHPA, it is exempted from disclosure under Exemption 3 of the federal Freedom of Information Act (5 USC 552)]. Likewise, the Information Centers of the CHRIS maintained by the OHP prohibit public dissemination of records search information. In compliance with these requirements, the results of the cultural resource investigation were prepared as a confidential document, which is not intended for public distribution in either paper or electronic format.

CULTURAL RESOURCES METHODOLOGY

RECORDS SEARCH

Sacramento County requested a confidential and non-confidential records search for the property at the North Central Information Center (NCIC) of the California Historic Resources Information System (CHRIS) at California State University Sacramento on June 6th, 2023. The records search was to determine the extent of previous surveys within a 0.25-mile (400-meter) radius of the proposed project location, and whether previously documented pre-contact or historic archaeological sites, architectural resources, or traditional cultural properties exist within this area.

The records search results indicate that 7 previous cultural resource investigations were conducted within a .25-mile radius of the project site, covering approximately 20 percent of the total area surrounding the property within the records search radius (Table 2); None of the combined surveys provide a full evaluation of the proposed project site. Therefore, a pedestrian survey of the Project site was conducted utilizing the current standards provided by the Office of Historic Preservation (OHP).

IS-Table 2: Previous Cultural Studies in or within 0.25 miles of the Project Site

Report Number SA-	Author(s)	Report Title	Year	Intersecting the Project parcel?
002398	Peak, Melinda A. and Robert A. Gerry	Cultural Resource Assessment for a Proposed Levee Relocation near Wilton, Sacramento County, California.	2000	Yes
005905	Jones & Stokes Associates, Inc.	Addendum Report: Cultural Resource Inventory for Five Levee Repair Locations along the Consumnes River.	1997	Yes
006913	Sikes, Nancy E.	Cultural Resources Survey for the Proposed Coyote Hills Project, Cosumnes, Sacramento County, California.	2006	No
008031	True, D.L.	Archaeological Survey at Rawhide Ranch.	1982	No
009180	Ritter, Eric W.	Archaeological Reconnaissance of the Folsom South Canal, Central Valley, California.	1971	No
009974	Nolte, Monica, John Dougherty, and Mary Maniery	Cultural Resources Inventory Sloughouse Reserve Project	2007	No
011190	Davis, Christian, and Daniel Grijalva	Field Office Report of Cultural Resources Ground Survey Findings: 791041111T	2011	No

The results of the records search indicate that two surveys intersect a portion of the parcel; however, no cultural resources were previously recorded within the site itself. Five additional reports occur within the 0.25-mile site buffer.

PHASE I PEDESTRIAN SURVEY

Sacramento County subjected the parcel to an intensive pedestrian survey under the guidance of the *Secretary of the Interior's Standards for the Identification of Historic Properties* (NPS 1983) using transects spaced 15 meters apart (Figure 2) on July 5th, 2023.

At the time, the ground surface was examined for indications of surface or subsurface cultural resources. The general morphological characteristics of the ground surface were inspected for indications of subsurface deposits that may be manifested on the surface, such as circular depressions or ditches. Whenever possible, the locations of subsurface exposures caused by such factors as rodent activity, water or soil erosion, or vegetation disturbances were examined for artifacts or for indications of buried deposits. No subsurface investigations or artifact collections were undertaken during the pedestrian survey.

The survey involved systematic investigation of the site's entire ground surface by walking in parallel 15-meter transects. During the survey the ground surface was examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, fire-affected rock, prehistoric ceramics), soil discoloration that might indicate the presence of an indigenous cultural midden, soil depressions, and features indicative of the former presence of structures or buildings (e.g., standing exterior walls, postholes, foundations, wells) or historic debris (e.g., metal, glass, ceramics). Ground disturbances such as gopher holes, burrows, cut banks, and drainage banks were also visually inspected.

CULTURAL RESOURCES PROJECT IMPACTS

No previously identified or existing resources were located within the project site as a result of the records search. Two previous surveys overlap the project site but did not identify cultural resources within the property. The field survey did identify isolated cultural resources within the property boundaries, but outside the proposed project footprint.

Due to the presence of alluvium along this portion of the Cosumnes River and identified resources within the surrounding area, the potential exists for buried historic and pre-contact archaeological sites within the project site, and a monitoring program is recommended. Therefore, impacts are ***less than significant with mitigation***.

TRIBAL CULTURAL RESOURCES

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

TRIBAL CULTURAL RESOURCES REGULATORY BACKGROUND

Tribal Cultural Resources are defined in Section 21074 of the California PRC as sites, features, places, cultural landscapes (geographically defined in terms of the size and scope), sacred places, and objects with cultural value to a California Native American tribe that are either included in or determined to be eligible for inclusion in the CRHR, or are included in a local register of historical resources as defined in subdivision (k) of Section 5020.1, or are 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 Section 5024.1. Section 1(b)(4) of Assembly Bill (AB) 52 established that only California Native American tribes, as defined in Section 21073 of the California PRC, are experts in the identification of Tribal Cultural Resources and impacts thereto.

TRIBAL COORDINATION METHODS

Sacramento County contacted the NAHC on July 13, 2023, to request a search of the Sacred Lands File (SLF) for the Project site. This search will determine whether or not California Native American tribes have recorded Sacred Lands within the Project site, because the Sacred Lands File is populated by members of the Native American community who have knowledge about the locations of tribal resources. The NAHC responded on July 13, 2023 with negative SLF results.

In accordance with Assembly Bill (AB) 52, codified as Section 21080.3.1 of CEQA, formal notification letters were sent to those tribes who had previously requested to be notified of Sacramento County projects on April 4, 2023. On April 12, 2023, Wilton Rancheria contacted Sacramento County to formally open consultation. This included requests to conduct a survey for Tribal Cultural Resources performed by a tribal representative (conducted on July 25, 2023), and mitigation measures described below for inadvertent discoveries.

TRIBAL CULTURAL RESOURCES CONCLUSION

No previously identified or existing resources were located within the project site as a result of the pedestrian survey. The field survey did identify isolated cultural resources within the property boundaries, but outside the proposed project footprint, suggesting that buried tribal cultural resources may exist. The County and the tribes mutually agreed on mitigation that is appropriate for the project. With the included mitigation, impacts are ***less than significant.***

HAZARDS AND HAZARDOUS MATERIALS

This section supplements the Initial Study Checklist by analyzing if the proposed project would:

Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials.

MICROWAVE EMISSIONS

Potential impacts associated with microwave emissions will be less than significant, per the following analysis.

PERSONAL WIRELESS SERVICE FACILITIES BACKGROUND

Three of the major types of personal wireless communication services currently in use are described below (information from the Federal Communications Commission (FCC) website at http://wireless.fcc.gov/services/index.htm?job=wtb_services_home (Accessed 5/22/2023).

CELLULAR TELEPHONE SERVICE

Cellular telephone service is an extension of ordinary telephone services, except that it utilizes radio waves instead of wire to transmit and receive telephone calls. The cellular radiotelephone service is intended to provide customers with mobile telephone service over a broad geographic area. A cellular system operates by dividing a large geographic service area into cells and assigning the same frequencies to multiple, non-adjacent cells. This is known as "frequency reuse". When a cellular subscriber makes or receives a call, the call is connected to the nearest cell site. As a subscriber travels within a cellular provider's service area, the cellular telephone call in progress is transferred, or "handed-off", from one cell site to another without noticeable interruption. The smaller and more numerous a provider's cells are, the more it can reuse frequencies and the more users it can accommodate. In addition, all the cells in a cellular system are connected to a mobile telephone switching office (MTSO) by wireline (landline) or microwave links. The MTSO switches wireline-to-mobile and mobile-to-wireline calls between the public switched telephone network (PSTN) and the cell site. Cellular radio systems operate in the 824 – 849 MHz and 869 – 894 MHz frequency range, per FCC allocation.

PERSONAL COMMUNICATIONS SERVICES (PCS)

PCS encompasses two different licensed services offered over two different frequency bands, as well as certain unlicensed service. "Narrowband" PCS operates on frequencies in the 901 – 941 MHz range and is suitable for offering a variety of specialized services such as Messaging and two-way paging. "Broadband" PCS is similar to cellular radiotelephone service, except that PCS operates in a higher frequency band (1850 – 1990 MHz) which allows for a wider variety of communications services such as digital, voice, data and paging transmissions, over the same spectrum. Because PCS operates at a higher frequency than cellular service, PCS systems may require more antenna transmitters in the same geographic area.

WIRELESS COMMUNICATIONS SERVICE (WCS)

WCS may provide fixed, mobile, radiolocation or satellite communication services to individuals and businesses within their assigned spectrum block and geographical area. The WCS is capable of providing advanced wireless phone services which are able to pinpoint subscribers in any given locale. WCS is used to provide a variety of mobile services, including an entire family of new communication devices utilizing very small, lightweight, multi-function portable phones and advanced devices with two-way data

capabilities. WCS systems are able to communicate with other telephone networks as well as with personal digital assistants, allowing subscribers to send and receive data and/or video messages without connection to a wire. By FCC allocation, WCS operates in one of two bands: 2305 – 2320 MHz and 2345 – 2360 MHz.

ELECTROMAGNETIC FIELDS (EMFS) AND SAFETY STANDARDS

The FCC published "A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance" (June 2, 2000, hereafter called RF Guide), the purpose of which is to ensure that the antenna facilities located in communities comply with the FCC's limits for human exposure to radiofrequency (RF) electromagnetic fields. The RF Guide explains the science of RF and the electromagnetic spectrum, the exposure guidelines and rules, and explains the procedures for compliance. The FCC Office of Engineering and Technology has also published Bulletin 56 (and 65, an addendum) in 1999, which answers many common questions about RF and about exposure limits. The RF Guide and Bulletins 56 and 65 are incorporated by reference and are available for review at the Division of Planning and Environmental Review, 827 7th Street, Room 225, Sacramento or online at http://www.fcc.gov/oet/rfsafety/ (Accessed 7/26/22). The information below is based entirely upon the incorporated publications.

As discussed above, personal wireless service facilities utilize radio waves to transmit and receive telephone calls. Radio waves and microwaves are forms of electromagnetic energy that are collectively described by the term "radiofrequency" or "RF." RF emissions can be discussed in terms of "energy," "radiation" or "fields." Radiation is simply defined as the movement of energy through space in the form of waves or particles. Electromagnetic radiation is when both electric and magnetic energy move together. The term "electromagnetic field" is used to indicate the presence of electromagnetic energy at a specific location. Like any wave-related phenomenon, electromagnetic energy is described by a wavelength and a frequency. RF signals are transmitted over a wide range of frequencies. The frequency of an RF signal is expressed in terms of cycles per second, or "Hertz" (Hz).

The range of wavelengths and frequencies of electromagnetic radiation is known as the electromagnetic spectrum. The frequency of the wave corresponds to its energy: a high frequency wave has high energy. Waves with sufficient energy are "ionizing", that is, they are capable of stripping electrons from atoms and molecules, which results in a fundamental alteration of the nature of those molecules. Only very high-frequency waves, such as X-rays and gamma rays, have sufficient energy to ionize atoms and molecules. At the low-frequency end of the electromagnetic spectrum are low-energy, non-ionizing waves such as radio waves and visible light. Radiation described as non-ionizing does not have sufficient energy to alter the nature of the atoms and molecules it encounters.

Electromagnetic energy is common in the environment, resulting from numerous human-made and natural sources. Human-made sources include electrical wiring, utility lines, appliances, computers, and television and radio broadcasts. Natural sources include the human body, the earth's magnetic field, and visible light. Electric

and magnetic fields produced by every-day electrical appliances, radio waves, and microwaves are low-energy – even visible light is higher energy than these sources. High-energy waves at the top of the spectrum are X-rays and gamma rays.

The rate at which an organism will absorb RF energy is specific to the type of organism – this is referred to as the specific absorption rate (SAR), defined as the power absorbed per mass of tissue (watts per kilogram). Therefore, standards for maximum safe exposure are set to limit the specific absorption rate (SAR) below a maximum permissible level as averaged over the human body. The absorption of this energy can result in thermal effects – that is, the energy produced causes heating of the tissues. At low-level RF radiation exposure, such as what is generated by appliances, cellular phones, and cellular towers, significant heating effects or health hazards are not observed.

To ensure that exposure remains well below safe limits, in August 1996 the Federal Communications Commission (FCC) adopted guidelines for evaluating the environmental effects of radio frequency emissions (FCC, (1996) Report and Order, ET Docket No. 93-62 Washington, D.C.). The guidelines effectively set a national radio frequency (RF) exposure standard based on elements of both the 1992 revision of the American National Standards Institute (ANSI) standard for RF exposure and the exposure criteria recommended by the National Council on Radiation Protection and Measurements (NCRP).

The 1996 FCC limits for maximum permissible exposure specifies two tiers of exposure criteria, one tier for “controlled environments” (usually involving occupational environments) and a second, more stringent tier for “uncontrolled environments” (usually involving the general public). The FCC limits set the allowable specific absorption rate (SAR) level from *localized* exposure (e.g., hand-held devices) at 1.6 watts per kilogram (W/kg) for the general public (uncontrolled environments), as averaged over 1 gram of tissue. The FCC recommended exposure limits for generalized exposure are summarized in Table 1 of Bulletin 56, which includes maximum power density levels for RF energy originating from communication sites (as well as other sources). The levels are determined based on continuous exposure, are dependent on the frequency which is transmitted from the site, and are usually expressed in milliwatts per square centimeter (mW/cm²).

Generally, personal wireless services such as cellular, PCS, and WCS transmit in a frequency range of 300 – 3000 MHz (megahertz). Power density limits for uncontrolled environments (i.e., general public) from transmitters in this range are calculated by dividing the frequency by 1500 (f/1500). Therefore, a facility transmitting at a frequency of 870 MHz would have a maximum recommended power density of 0.58 mW/cm². At frequencies of 1500 – 100,000MHz the maximum power density is set at 1.0 mW/cm².

REGULATORY BACKGROUND

Section 704 of the Telecommunications Act of 1996 (the “1996 Act”) addresses federal, state and local government oversight of site selection for personal wireless service facilities such as towers for cellular, personal communication services, and specialized

mobile radio transmitters. The 1996 Act states the following regarding a local government's jurisdiction pertaining to the environmental effects of radio frequency emissions (FCC, Wireless Telecommunications Bureau (1996), Fact Sheet #1 National Wireless Facilities Siting Policies, Washington, D.C.):

"No state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

On January 1, 1997, the new Guidelines adopted by the FCC (referred to as "the Commission" in the 1996 Act section cited above) went into effect. As discussed above, the new guidelines set a national RF exposure standard which is based on elements of both the 1992 revision of the ANSI/IEEE standard and the exposure criteria recommended by the National Council on Radiation Protection and Measurements. In addition, the updated guidelines are based on recommendations from those federal agencies responsible for health and safety, including the Environmental Protection Agency (EPA), the Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA), the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA). The FCC has stated that the updated guidelines will ensure that the public and workers are adequately protected from exposure to potentially harmful RF emissions.

PROJECT SPECIFIC INFORMATION

There are no known significant biological effects associated with cellular facilities when they are operated at or below FCC-adopted standards. At this location, the applicant is proposing an 130-foot tall monopole that will accommodate twelve (12) 8-foot direction panel antennas and six (6) RRUs (remote radio units), (1) 2-foot microwave, (1) GPS Antenna. There are specific FCC regulations regarding radiofrequency exposure that address the actions necessary to bring an accessible area into compliance with the 5% power density exposure limit. No significant environmental impacts related to EMF emissions are expected as a result of this project; impacts are ***less than significant***.

TOWER FAILURE

Communication towers are manufactured under rigid conditions and the design and required safety factors are specified in the Uniform Building Code. The pole fabrication process is subject to independent inspection. The tower and foundation designs will be engineered to meet or exceed all requirements of the Uniform Building Code. The codes take into account the various stress loads that could be placed on the tower structure by earthquake, winds, storms, and any other combinations of high stress factors. The safety factors involved in the manufacture of these poles and their installation results in a very large margin of safety.

Accredited by the American National Standards Institute (ANSI), a Standard entitled "Structural Standards for Antenna Supporting Structures and Antennas" has been established for the design, superstructure, and foundation of telecommunication towers.

This standard is designated as ANSI/TIA-222, provisions F and G, and is the governing document for telecommunication towers in the United States. The development of the standard was sponsored by the *Telecommunication* Industry Association (TIA) subcommittee TR-14.7. The key aspects discussed in the document are: modernization of the design of new towers and existing towers, definition of wind and ice load, and applicable requirements in the case of seismic activity.

DISCUSSION

The "fall drop zone" (radius of tower failure) for the proposed project is estimated to be within a 130± foot radius of the tower center. The area that would be affected by potential pole collapse consists of open agricultural field and portions of neighboring parcels which are also open agricultural fields. The parcel to the southeast of the project site does contain a single family residence that is approximately 140 feet away from the proposed tower location. Therefore, it is outside the fall drop zone. The monopole is an engineer-designed structure that will comply with the safety factors specified in the Uniform Building Code, monopole failure is considered extremely unlikely. Potential impacts as a result of monopole collapse are therefore considered ***less than significant.***

ENVIRONMENTAL MITIGATION MEASURES

Mitigation Measures are critical to ensure that identified significant impacts of the project are reduced to a level of less than significant. Pursuant to Section 15074.1(b) of the CEQA Guidelines, each of these measures must be adopted exactly as written unless both of the following occur: (1) A public hearing is held on the proposed changes; (2) The hearing body adopts a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.

MITIGATION MEASURE A: BASIC CONSTRUCTION EMISSIONS CONTROL PRACTICES

The following Basic Construction Emissions Control Practices are considered feasible for controlling fugitive dust from a construction site. The practices also serve as best management practices (BMPs), allowing the use of the non-zero particulate matter significance thresholds.

Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.

- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.

- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.

- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).

- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel-powered equipment. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. For more information contact CARB at 877-593-6677, doors@arb.ca.gov, or www.arb.ca.gov/doors/compliance_cert1.html.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic

MITIGATION MEASURE B: SWAINSON'S HAWK SURVEY (TAC 2000)

If construction, grading, or project-related improvements are to commence between February 1 and September 15, focused surveys for Swainson's hawk nests shall be conducted by a qualified biologist within a ½-mile radius of project activities, in accordance with the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk TAC 2000). To meet the minimum level of protection for the species, surveys should be completed for the two survey periods immediately prior to commencement of construction activities in accordance with the 2000 TAC recommendations. If active nests are found, CDFW shall be contacted to determine appropriate protective measures, and these measures shall be implemented prior to the start of any ground-disturbing activities. If no active nests are found during the focused survey, no further mitigation will be required.

MITIGATION MEASURE C: MIGRATORY BIRD NEST PROTECTION

To avoid impacts to nesting migratory birds the following shall apply:

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.

2. Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through August, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.

3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged, or until September 1.

Mitigation Measure D: Raptor Nest Protection

If construction activity (which includes clearing, grubbing, or grading) is to commence within 500 feet of suitable nesting habitat between March 1 and September 15, a survey for raptor nests shall be conducted by a qualified biologist. The survey shall cover all potential tree and ground nesting habitat on-site and off-site up to a distance of 500 feet from the project boundary. The survey shall occur within 30 days of the date that construction will encroach within 500 feet of suitable habitat. The biologist shall supply a brief written report (including date, time of survey, survey method, name of surveyor and survey results) to the Environmental Coordinator prior to ground disturbing activity. If no active nests are found during the survey, no further mitigation will be required. If any active nests are found, the Environmental Coordinator and California Fish and Wildlife shall be contacted to determine appropriate avoidance/protective measures. The avoidance/protective measures shall be implemented prior to the commencement of construction within 500 feet of an identified nest.

Mitigation measure E: Burrowing owl

Prior to the commencement of construction activities (which includes clearing, grubbing, or grading) within 500 feet of suitable burrow habitat, a survey for burrowing owl shall be conducted by a qualified biologist. The survey shall occur within 30 days of the date that construction will encroach within 500 feet of suitable habitat. Surveys shall be conducted in accordance with the following:

A survey for-burrows and owls should be conducted by walking through suitable habitat over the entire project site and in areas within 150 meters (~500 feet) of the project impact zone.

Pedestrian survey transects should be spaced to allow 100 percent visual coverage of the ground surface. The distance between transect center lines should be no more than 30 meters (~100 feet), and should be reduced to account for differences in terrain,

vegetation density, and ground surface visibility. To efficiently survey projects larger than 100 acres, it is recommended that two or more surveyors conduct concurrent surveys. Surveyors should maintain a minimum distance of 50 meters (~160 feet) from any owls or occupied burrows. It is important to minimize disturbance near occupied burrows during all seasons.

If no occupied burrows or burrowing owls are found in the survey area, a letter report documenting survey methods and findings shall be submitted to the Environmental Coordinator and no further mitigation is necessary.

If occupied burrows or burrowing owls are found, then a complete burrowing owl survey is required. This consists of a minimum of four site visits conducted on four separate days, which must also be consistent with the Survey Method, Weather Conditions, and Time of Day sections of Appendix D of the California Fish and Wildlife "Staff Report on Burrowing Owl Mitigation" (March 2012).

Submit a survey report to the Environmental Coordinator which is consistent with the Survey Report section of Appendix D of the California Fish and Wildlife "Staff Report on Burrowing Owl Mitigation" (March 2012).

If occupied burrows or burrowing owls are found the applicant shall contact the Environmental Coordinator and consult with California Fish and Wildlife prior to construction, and will be required to submit a Burrowing Owl Mitigation Plan (subject to the approval of the Environmental Coordinator and in consultation with California Fish and Wildlife). This plan must document all proposed measures, including avoidance, minimization, exclusion, relocation, or other measures, and include a plan to monitor

mitigation success. The California Fish and Wildlife "Staff Report on Burrowing Owl Mitigation" (March 2012) should be used in the development of the mitigation plan.

MITIGATION MEASURE F: CULTURAL RESOURCES UNANTICIPATED DISCOVERY

In the event that human remains are discovered in any location other than a dedicated cemetery, work shall be halted and the County Coroner contacted. For all other unexpected cultural resources discovered during project construction, work shall be halted until a qualified archaeologist may evaluate the resource encountered.

Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop and the County Coroner and the Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation

work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.

In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either 1) not cultural in origin; or 2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained at the Applicant's expense to evaluate the significance of the find. If the onsite tribal monitor determines the resource to have tribal cultural value, then the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed.

If a potentially-eligible resource is encountered, then the archaeologist and/or tribal monitor, Planning and Environmental Review staff, and project proponent shall arrange for either 1) total avoidance of the resource, if possible; or 2) test excavations or total data recovery as mitigation. The determination shall be formally documented in writing and submitted to the County Environmental Coordinator as verification that the provisions of CEQA for managing unanticipated discoveries have been met.

MITIGATION MEASURE G: TRIBAL CULTURAL RESOURCES

1. Measure 1: Communication Protocols for Monitoring:
   The applicant shall develop a set of communication protocols, to the satisfaction of the County and tribes, to identify all points of contact and to ensure that tribes are notified when the applicant will proceed with authorized construction activities. Points of contact will be established for the applicant, construction supervisor, monitoring tribes, and County Archaeologist, and the cell phone numbers and email addresses must be documented and shared among all parties. Points of contact are responsible for identifying backup representatives in the event they are unable to perform due to an absence or other reasons.

2. Measure 2: Tribal Monitoring
   Wilton Rancheria shall be afforded an opportunity to provide a paid tribal monitor at the Applicant's expense for all construction-related ground-disturbing activity. This is to ensure that the procedures for unanticipated discoveries are addressed expeditiously and in accordance with tribal values. "Ground-disturbing activity" is defined herein as any activities that have the potential to disturb soil beyond that which was reasonably visible to tribal representatives and archaeologists during the pre- Project pedestrian survey. This includes: grading; trenching; excavation for below-ground utility installation or foundation work; and any other below the ground activities. Monitoring is not required for backfilling of previously excavated areas, placement of equipment into excavated areas, reseeding, or revegetation,

regrading or contouring of soil that was previously monitored, or for any aboveground Project activity or construction that does not include ground disturbance, but monitors are allowed to observe at their discretion.

MITIGATION MEASURE COMPLIANCE

Comply with the Mitigation Monitoring and Reporting Program (MMRP) for this project as follows:

The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is $5,700.00. This fee includes administrative costs of $1,050.00.

Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

INITIAL STUDY CHECKLIST

Appendix G of the California Environmental Quality Act (CEQA) provides guidance for assessing the significance of potential environmental impacts. Based on this guidance, Sacramento County has developed the following Initial Study Checklist. The Checklist identifies a range of potential significant effects by topical area. The words "significant" and "significance" used throughout the following checklist are related to impacts as defined by the California Environmental Quality Act as follows:

1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more “Potentially Significant” entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.

2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.

3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
1. **LAND USE** - Would the project:					
a. Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X		Sacramento County Zoning Code section 3.6.7. stipulates development standards for wireless towers.
b. Physically disrupt or divide an established community?				X	The project will not create physical barriers that substantially limit movement within or through the community.
2. **POPULATION/HOUSING -** Would the project:					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?				X	The proposed infrastructure project is intended to service existing or planned development and will not induce substantial unplanned population growth.
b. Displace substantial amounts of existing people or housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
3. **AGRICULTURAL RESOURCES** - Would the project:					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?			X		The portion of the project site that the WCF will be installed is labeled as Farmland of Statewide Importance. However, the project site will only convert a 40'x40' pad. Therefore, the impacts to Agricultural resources would be less than significant.
b. Conflict with any existing Williamson Act contract?			X		The project site is located on a Williamson Act contract site. Per County code Sec. 51238 (a) (2), Wireless Communication Facilities are a compatible land use.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?			X		The project is a compatible land use on the Williamson Act parcel.
4. **AESTHETICS -** Would the project:					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?				X	The project site is 13.6 miles east pf the nearest scenic Highway. The project is not in the vicinity of any scenic highways, corridors, or vistas.
b. In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings?			X		It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the non-urban environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity. The project is consistent with policies associated with aesthetics, please refer to the Aesthetics discussion in the Environmental Effects section above.
c. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X	The project will not occur in an urbanized area.
d. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?				X	The project will not result in a new source of substantial light, glare or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
5. **AIRPORTS -** Would the project:					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.
d. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				X	The project does not involve or affect air traffic movement.
6. **PUBLIC SERVICES -** Would the project:					
a. Have an adequate water supply for full buildout of the project?			X		The project will not result in increased demand for water supply.
b. Have adequate wastewater treatment and disposal facilities for full buildout of the project?				X	The project will not require wastewater services.
c. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X	The Kiefer Landfill has capacity to accommodate solid waste until the year 2050.
d. Result in substantial adverse physical impacts associated with the construction of new water supply or wastewater treatment and disposal facilities or expansion of existing facilities?				X	The project will not require construction or expansion of new water supply, wastewater treatment, or wastewater disposal facilities.
e. Result in substantial adverse physical impacts associated with the provision of storm water drainage facilities?				X	Project construction would not require the addition of new stormwater drainage facilities.
f. Result in substantial adverse physical impacts associated with the provision of electric or natural gas service?			X		Minor extension of utility lines would be necessary to serve the proposed project. Existing utility lines are located along existing roadways and other developed areas, and the extension of lines would take place within areas already proposed for development as part of the project. No significant new impacts would result from utility extension.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
g. Result in substantial adverse physical impacts associated with the provision of emergency services?			X		The project would incrementally increase demand for emergency services, but would not cause substantial adverse physical impacts as a result of providing adequate service.
h. Result in substantial adverse physical impacts associated with the provision of public school services?				X	The project will not require the use of public school services.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?				X	The project will not require park and recreation services.
7. **TRANSPORTATION** - Would the project:					
a. Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) – measuring transportation impacts individually or cumulatively, using a vehicles miles traveled standard established by the County?			X		The project will not increase vehicle trips. Although there will be periodic maintenance trips to the site, the total number of trips will not be more than 237 trips/day so an analysis is not necessary.
b. Result in a substantial adverse impact to access and/or circulation?			X		No changes to existing access and/or circulation patterns would occur as a result of the project.
c. Result in a substantial adverse impact to public safety on area roadways?			X		No changes to existing access and/or circulation patterns would occur as a result of the project; therefore no impacts to public safety on area roadways will result.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X		The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
8. **AIR QUALITY** - Would the project:					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment. The project is within the screening criteria for construction related impacts related to air quality. The project site is less than 35 acres, and does not involve buildings more than 4 stories tall; demolition activities; significant trenching activities; an unusually compact construction schedule; cut-and-fill operations; or, import or export of soil materials requiring a considerable amount of haul truck activity. Basic Construction Emissions Control Practices have also been included as a mitigation measure with which the project must comply. The project meets the Sacramento Metropolitan Air Quality Management District's screening criteria for PM_{10} and $PM_{2.5}$ and Ozone precursors.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?			X		There are no sensitive receptors (i.e., schools, nursing homes, hospitals, daycare centers, etc.) adjacent to the project site. See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?				X	The project will not generate objectionable odors.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
9. **NOISE -** Would the project:					
a. Result in generation of a temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?			X		The project is not in the vicinity of any uses that generate substantial noise, nor will the completed project generate substantial noise. The project will utilize an on-site backup generator to be used for emergency purposes only. The County Noise Ordinance (Chapter 6.68 of the County Code) has an allowance for increased noise levels for emergency purposes. The project will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
c. Generate excessive groundborne vibration or groundborne noise levels.			X		The project will not involve the use of pile driving or other methods that would produce excessive groundborne vibration or noise levels at the property boundary.
10. **HYDROLOGY AND WATER QUALITY** - Would the project:					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?				X	The project will not substantially increase water demand over the existing use.
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?			X		The project does not involve any modifications that would substantially alter the existing drainage pattern and/ or increase the rate or amount of surface runoff in a manner that would lead to flooding.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?			X		The project is within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, refer to the Floodplain discussion above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?			X		The project site is within a 100-year floodplain and would be required to comply with the provisions of the Sacramento County Floodplain Management Ordinance. See the Floodplain discussion above
e. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X		The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
f. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?			X		The minor increase in impervious surface area would not contribute runoff that would exceed the capacity of the existing stormwater drainage system.
g. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.
11. **GEOLOGY AND SOILS - Would the project:**					
a. Directly or indirectly cause potential substantial adverse effects, including risk of loss, injury or death involving 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?				X	Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?			X		Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
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, soil expansion, liquefaction or collapse?			X		The project is not located on an unstable geologic or soil unit.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?				X	The project will not require sewer connections.
e. Result in a substantial loss of an important mineral resource?				X	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X		No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
12. **BIOLOGICAL RESOURCES** - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?		X			The Project site is located within ½ mile of an identified Swainson's Hawk nesting site. Mitigation has been incorporated in the form of a Swainson's Hawk Nesting Survey. Also, the Project site vicinity may provide nesting habitat for other raptors, migratory birds, and burrowing owl. Mitigation has been incorporated to mitigate any potential impacts to a less than significant level (Mitigation Measures A through E). Refer to the biological resources discussion above.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		The project site is located on a parcel that borders the Cosumnes River riparian habitat. However, the project site is located 0.5 miles away from the riparian zone. No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?				X	The project will not take place in or immediately next to the Cosumnes River. The project site is 0.5 miles southeast of the river. The project will not have a substantial adverse effect on protected waters.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?			X		The project site is a 40 foot by 40 foot piece of the parcel. The project will have minimal impact to the surrounding habitat.
e. Adversely affect or result in the removal of native or landmark trees?			X		The project does not propose to remove any trees. One native oak tree along the proposed access road that will leave from Fig Road to the 40 foot by 40 foot pad would experience minimal encroachment. See discussion in the Biological Resources section under Native Tree Encroachment .
f. Conflict with any local policies or ordinances protecting biological resources?			X		The project is consistent with local policies/ordinances protecting biological resources.
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?				X	There are no known conflicts with any approved plan for the conservation of habitat.
13. **CULTURAL RESOURCES -** Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?			X		No historical resources would be affected by the proposed project. In the unlikely event that subsurface materials are uncovered during construction, mitigation for inadvertent discoveries has been incorporated.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Have a substantial adverse effect on an archaeological resource?			X		The Northern California Information Center was contacted regarding the proposed project and a pedestrian survey was conducted. Refer to Cultural Resources section. A record search indicated that the project site is not considered sensitive for archaeological resources. Mitigation for inadvertent discoveries is incorporated in the event that unknown subsurface resources are uncovered during construction.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		The project site is located outside any area considered sensitive for the existence of undiscovered human remains. Refer to the Cultural Resources section above. Mitigation for inadvertent discoveries is incorporated in the event that unknown subsurface resources are uncovered during construction.
14. **TRIBAL CULTURAL RESOURCES -** Would the project:					
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes. Wilton Rancheria requested consultation on the project and mitigation has been incorporated into the project to reduce impacts to a less than significant level. Refer to the Tribal Cultural Resources section above.
15. **HAZARDS AND HAZARDOUS MATERIALS** - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?			X		The project does not involve the transport, use, and/or disposal of hazardous material.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project site is not located within ¼ mile of an existing /proposed school. The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?			X		The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?			X		The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?			X		There is no significant risk of loss, injury, or death to people or structures associated with wildland fires. The project is surrounded by rural land use.
16. ENERGY – Would the project:					
a. Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction?			X		Compliance with Title 24, Green Building Code, will ensure that all project energy efficiency requirements are met resulting in less than significant impacts.
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X		The project will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
17. GREENHOUSE GAS EMISSIONS – Would the project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		According to Sacramento Metropolitan Air Quality Management District (SMAQMD) construction screening criteria, projects that are less 35 acres or less in size generally will not exceed the Districts' construction NOx Threshold of significance. The project site will only disturb a 40x by 40 ft piece of land. Therefore, impacts associated with greenhouse gas emissions are less than significant.
b. Conflict with an applicable plan, policy or regulation for the purpose of reducing the emission of greenhouse gases?				X	The project is consistent with County policies adopted for the purpose of reducing the emission of greenhouse gases.

SUPPLEMENTAL INFORMATION

LAND USE CONSISTENCY	**Current Land Use Designation**	**Consistent**	**Not Consistent**	**Comments**
General Plan	General Agricultural 20ac	X		
Community Plan	N/A	X		Not in a Community Plan Land Use area
Land Use Zone	AG-80	X		

INITIAL STUDY PREPARERS

Environmental Coordinator: Julie Newton

Associate Environmental Analyst: John Q. Barnard IV

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulit