Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # _____

Project Title: Use Permit 19-0010

Lead Agency: Shasta County Department of Resource Management – Planning Division Contact Person: Luis A. Topete, Associate Planner

Mailing Address: 1855 Placer Street, Suite 103 Phone: (530) 225-5532

City: Redding, CA Zip: 96001 County: Shasta

Project Location: County: Shasta City/Nearest Community: Bella Vista

Cross Streets: 0.6 miles west of the intersection of State Highway 299E and Deschutes Road Zip Code: 96008

Lat. / Long.: 40° 38′ 3.25″ N/ 122° 15′ 3.16″ W Total Acres: 102.9

Assessor's Parcel No.: 061-470-087 Section: 18 Twp.: 32N Range: 3W Base: MDB&M

Within 2 Miles: State Hwy #: 299 Airports: N/A Railways: N/A Schools: Crossroads Christian; Bella Vista Elementary; Bella Vista State Preschool #1

Waterways: Dry Creek; Little Cow Creek; Clough Creek; Salmon Creek; East Valley Creek; Yank Creek

Document Type:

CEQA:
- ☐ NOP
- ☐ Early Cons
- ☐ Neg Dec
- ☒ Mit Neg Dec
- ☐ Draft EIR
- ☐ Supplement/Subsequent EIR (Prior SCH No.) _____
- Other _____

NEPA:
- ☐ NOI
- ☐ EA
- ☐ Draft EIS
- ☐ FONSI

Other:
- ☐ Joint Document
- ☐ Final Document
- ☐ Other _____

Local Action Type:

- ☐ General Plan Update
- ☐ General Plan Amendment
- ☐ General Plan Element
- ☐ Community Plan
- ☐ Specific Plan
- ☐ Master Plan
- ☐ Planned Unit Development
- ☐ Site Plan
- ☐ Rezone
- ☐ Prezone
- ☒ Use Permit
- ☐ Land Division (Subdivision, etc.)
- ☐ Annexation
- ☐ Redevelopment
- ☐ Coastal Permit
- ☐ Other _____

Development Type:

- ☐ Residential: Units _____ Acres _____
- ☐ Office: Sq.ft. _____ Acres _____ Employees _____
- ☐ Commercial: Sq.ft. _____ Acres _____ Employees _____
- ☐ Industrial: Sq.ft. _____ Acres _____ Employees _____
- ☐ Educational _____
- ☐ Recreational _____
- ☐ Water Facilities: Type _____ MGD _____
- ☐ Transportation: Type _____
- ☐ Mining: Mineral _____
- ☐ Power: Type _____ MW _____
- ☐ Waste Treatment: Type _____ MGD _____
- ☐ Hazardous Waste: Type _____
- ☒ Other: Wireless Telecommunications Facility

Project Issues Discussed in Document:

- ☒ Aesthetic/Visual
- ☐ Agricultural Land
- ☒ Air Quality
- ☐ Archeological/Historical
- ☒ Biological Resources
- ☐ Coastal Zone
- ☐ Drainage/Absorption
- ☐ Economic/Jobs
- ☐ Flood Plain/Flooding
- ☐ Forest Land/Fire Hazard
- ☒ Geologic/Seismic
- ☒ Greenhouse Gas Emissions
- ☐ Minerals
- ☒ Noise
- ☐ Population/Housing Balance
- ☐ Public Services/Facilities
- ☐ Recreation/Parks
- ☐ Schools/Universities
- ☐ Septic Systems
- ☐ Sewer Capacity
- ☐ Soil Erosion/Compaction/Grading
- ☐ Solid Waste
- ☐ Toxic/Hazardous
- ☐ Traffic/Circulation
- ☐ Vegetation
- ☒ Water Quality
- ☐ Water Supply/Groundwater
- ☐ Wetland/Riparian
- ☒ Wildlife
- ☐ Growth Inducing
- ☒ Land Use
- ☒ Cumulative Effects
- ☐ Other _____

Present Land Use/Zoning/General Plan Designation:

The project site is a portion of a102.9-acre parcel containing an existing wireless telecommunications facility located within 300 feet of the proposed facility; the remainder of the site is undeveloped and consists of annual grasslands and interspersed tree coverage. The General Plan land use designation is Rural Residential A (RA) and the zoning is Unclassified (U).

Project Description: *(please use a separate page if necessary)*

The proposed project is a new unmanned wireless telecommunications facility consisting of a 100-foot tall monopole tower with 9 panel antennas, 18 remote radio units, and two 4-foot diameter microwave dishes, an 8-foot by 8-foot pre-manufactured concrete equipment shelter and associated interior equipment, a 30kW diesel standby generator with an attached 190-gallon fuel tank and other ancillary onsite equipment within a 30-foot by 35-foot lease area enclosed by a 6-foot tall chain link fence with vinyl slats that is accessible via an existing access road.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "**X**".
If you have already sent your document to the agency please denote that with an "**S**".

____	Air Resources Board	____	Office of Emergency Services
____	Boating & Waterways, Department of	____	Office of Historic Preservation
X	California Highway Patrol	____	Office of Public School Construction
____	CalFire	____	Parks & Recreation
X	Caltrans District # 2	____	Pesticide Regulation, Department of
____	Caltrans Division of Aeronautics	____	Public Utilities Commission
____	Caltrans Planning (Headquarters)	X	Regional WQCB # 5
____	Central Valley Flood Protection Board	____	Resources Agency
____	Coachella Valley Mountains Conservancy	____	S.F. Bay Conservation & Development Commission
____	Coastal Commission	____	San Gabriel & Lower L.A. Rivers and Mtns Conservancy
____	Colorado River Board	____	San Joaquin River Conservancy
____	Conservation, Department of	____	Santa Monica Mountains Conservancy
____	Corrections, Department of	____	State Lands Commission
____	Delta Protection Commission	____	SWRCB: Clean Water Grants
____	Education, Department of	____	SWRCB: Water Quality
____	Energy Commission	____	SWRCB: Water Rights
X	Fish & Game Region # 1	____	Tahoe Regional Planning Agency
____	Food & Agriculture, Department of	____	Toxic Substances Control, Department of
____	General Services, Department of	____	Water Resources, Department of
____	Health Services, Department of		
____	Housing & Community Development	____	Other _____
____	Integrated Waste Management Board	____	Other _____
____	Native American Heritage Commission		

Local Public Review Period (to be filled in by lead agency)

Starting Date: February 24, 2020 Ending Date: March 24, 2020

Lead Agency (Complete if applicable):

Consulting Firm: New Cingular Wireless PCS, LLC
Address: 605 Coolidge Drive, #100
City/State/Zip: Folsom, CA 95650
Contact: Sara King
Phone: (916) 296-2011

Applicant: Marc Anthony Growth Investment Company LLC
Address: 1060 Fulton Street
City/State/Zip: San Francisco, CA 94117
Phone: (415) 941-9967

Signature of Lead Agency Representative: Paul C. Hell **Date:** 2/20/20

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

ENVIRONMENTAL INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

Use Permit 19-0010
AT&T Mobility

March 21, 2020

ENVIRONMENTAL INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION
WITH
References and Documentation

Prepared by
SHASTA COUNTY DEPARTMENT OF RESOURCE MANAGEMENT
PLANNING DIVISION
1855 Placer Street, Suite 103
Redding, California 96001

SHASTA COUNTY
ENVIRONMENTAL CHECKLIST FORM

INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

1. Project Title:
Use Permit 19-0010 (AT&T Mobility)

2. Lead agency name and address:
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001-1759

3. Contact Person and Phone Number:
Luis A. Topete, Associate Planner, (530) 225-5532

4. Project Location:
The project is located on a 102.9-acre property on the south side of State Highway 299E, approximately 0.6 miles west of the intersection of State Highway 299E and Deschutes Road at 21655 State Highway 299E, Bella Vista, CA 96008 (Assessor Parcel Number 061-470-087).

5. Applicant Name and Address:
New Cingular Wireless PCS, LLC dba AT&T Mobility
605 Coolidge Drive, #100
Folsom, CA 95650

6. General Plan Designation:
Rural Residential A (RA)

7. Zoning:
Unclassified (U)

8. Description of Project:
The project is a use permit application for a new unmanned wireless telecommunications facility consisting of a 100-foot tall monopole tower with 9 panel antennas, 18 remote radio units, and two 4-foot diameter microwave dishes, an 8-foot by 8-foot pre-manufactured concrete equipment shelter and associated interior equipment, a 30kW diesel standby generator with an attached 190-gallon fuel tank and other ancillary onsite equipment within a 30-foot by 35-foot lease area enclosed by a 6-foot tall chain link fence with vinyl slats that is accessible via an existing access road.

9. Surrounding Land Uses and Setting:
The project site is a 102.9-acre property with an existing wireless telecommunications facility at the northeast corner of the property within 300 feet of the facility being proposed, with the remainder of the site being undeveloped with annual grasslands and interspersed tree coverage. The proposed facility would be set back approximately 400 feet from State Highway 299E, behind the existing wireless facility. There are existing dirt access roads throughout the site, including an existing dirt access leading to the location of the proposed wireless facility. Surrounding properties are zoned Rural Residential (R-R) to the east, R-R combined with the Mobile Home (R-R-T) district to the south, R-R with a five-acre minimum lot area (R-R-BA-5) to the southwest, R-R-T and Mixed Use (MU) to the west, R-R-T to the north, and a Planned Developed (PD) to the northeast. Adjacent land uses primarily include low-density rural residential development on all sides, some undeveloped land, and one commercial business, Country Aire Pet Resort, to the north. The proposed wireless facility is at an approximate elevation of 693 feet above mean sea level (AMSL) and the site is gently sloped.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):
Federal Communications Commission

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?
In accordance with Public Resources Code (PRC) Section 21080.3.1, the Wintu Tribe of Northern California and Toyon-Wintu Center (Tribe) filed and Shasta County received a request for formal notification of proposed projects within an area of Shasta County that is traditionally and culturally affiliated with the Tribe. Pursuant to PRC §21080.3.1 the Department of Resource Management sent a certified letter to notify the Tribe that the project was under review and to provide the Tribe 30 days from the receipt of the letter to request formal consultation on the project in writing. To date, no response has been received.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

	Aesthetics		Agricultural Resources		Air Quality
	Biological Resources		Cultural Resources		Energy
	Geology / Soils		Greenhouse Gas Emissions		Hazards & Hazardous
	Hydrology / Water Quality		Land Use / Planning		Mineral Resources
	Noise		Population / Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
	Utilities / Service Systems		Wildfire		Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of the initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR of NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Copies of the Initial Study and related materials and documentation may be obtained at the Planning Division of the Department of Resource Management, 1855 Placer Street, Suite 103, Redding, CA 96001. Contact Luis A. Topete, Associate Planner at (530) 225-5532.

Luis A. Topete
Associate Planner

02/20/2020
Date

Paul A. Hellman
Director of Resource Management

2/20/20
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A "No Impact" answer is adequately supported if all the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more, "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less-than-significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVIII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures: For effects that are "Less-than-significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. General Plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify the following:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less-than-significant.

I. **AESTHETICS:** Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			✔	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✔
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		✔		
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✔	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Collocation and Height Analysis Report prepared by Epic Wireless Group, LLC (2019), the following findings can be made:

a) The proposed wireless telecommunications facility is a 100-foot tall monopole tower with 9 panel antennas, 18 remote radio units, and two 4-foot diameter microwave dishes. Photo simulations of the proposed tower (prepared by *AdvanceSim*) were provided from four public vantage points, the first from State Highway 299E near the northeast corner of the property looking south, the second from the intersection of Kern Drive and State Highway 299E looking east, the third from Old Alturas Road near the southeast corner of the property looking north, and the fourth from Old Alturas Road near its intersection with Hidden Acres Road looking north. The visual character of the proposed tower is consistent with the existing non-camouflaged monopole tower located within 300 feet of the proposed facility. The structure is set back approximately 265 feet from the property line to the north and behind the existing monopole which is approximately 100 feet from the north property line. The setback to the eastern property line is approximately 386 feet, approximately 1,000 feet to the southern property line and approximately 2,300 feet to the western property line. Due to the surrounding topography, existing tree canopy, large size of the property and presence of the existing monopole tower within 300 feet, the proposed tower would not have a substantial adverse effect on a scenic vista.

b) The project would not substantially damage any scenic resource. This section of State Highway 299E is where the natural and manmade environment contrast. The project site is not visible from a designated scenic highway.

c) The General Standards of the Shasta County Zoning Plan Section 17.88.282.D includes requirements that aid in protecting the existing visual character and quality of the site and its surroundings, such as the requirement that landscaping shall be provided and maintained for the life of the facility to screen any ground structures or equipment, setback requirements and prohibiting wireless telecommunications facilities to be placed within one thousand five hundred feet of an existing wireless telecommunications facility unless environmental documentation verifies that a concentration of towers in close proximity will not have a cumulative adverse impact on the visual character or quality of the site and its surroundings. The proposed tower would be located within 300 feet of an existing onsite monopole tower. To mitigate for the proposed concentration of towers onsite, the it will be necessary for the proposed tower to be camouflaged as a pine tree. Due to the surrounding topography, existing tree canopy, large size of the property, general standards for wireless telecommunications facilities in the Shasta County Zoning Plan and discussion above under Section I.a.), with the implementation of the following mitigation measures the proposed tower would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

d) The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in a non-urbanized area. The equipment shelter is equipped with two shielded down tilt lights with motion sensors and auto shutoff timers. Therefore, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Mitigation/Monitoring: With the implementation of the following mitigation measures, the aesthetics impacts of the project would be less-than-significant.

I.a.1) The proposed monopole tower shall be camouflaged as a pine tree (monopine). The entire monopine structure (including the top portion) shall replicate, to the maximum extent possible, the form of a pine tree in terms of shape (conical rather than symmetrical), foliage density, and branch structure and will have no less than 3 branches per lineal foot starting at not less than 15 feet above ground. The length of the artificial branches shall exceed that of the antenna arrays by a minimum of one foot and the density of the artificial foliage shall be such that the visibility of the antenna arrays are secondary to that of the monopine. Antennas and associated hardware shall be entirely screened from view by utilizing pine needle socks and other necessary methods. The pole shall be round and covered with simulated bark. The permittee shall provide samples of the bark, branches, and pine needles to the Planning Division. Building plans for the monopine facility shall include details and specifications pertaining to the appearance of the monopine. Both samples and plans are to be reviewed and approved by the Planning Director prior to building permit issuance.

I.a.2) All ancillary equipment and hardware attached to the monopine structure shall have a non-reflective finish and colored to blend in with the monopine designed structure. The ground equipment shall have a non-reflective finish and the fence or wall shall have an earth-tone color. The proposed colors shall be submitted to and approved by the Planning Director prior to building permit issuance.

I.a.3) The monopine structure (branches and bark, antennas and associated equipment) shall be maintained in good condition in terms of color, texture, and overall natural appearance. The permittee shall agree to reasonable repairs and replacement of equipment and structural and aesthetic components, due to damage caused by outdoor exposure and/or inclement weather. The permittee shall replace such components within 60 days of written notice by the County.

II. <u>AGRICULTURE AND FORESTRY RESOURCES</u>: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✔
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				✔
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				✔
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✔
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The subject property is not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the map titled Shasta County Important Farmland 2016.

b) Neither this property nor the surrounding properties are zoned for agricultural use nor are they in a Williamson Act Contract.

c) The project site is not forest land, timberland or zoned Timberland Production. Therefore, the project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

d) The project site is not forest land. Therefore, the project would not result in the loss of forest land or conversion of forest land to non-forest use.

e) The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. The site is not located in an area of significant agricultural soils.

Mitigation/Monitoring: None proposed.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?				✔
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?			✔	
c) Expose sensitive receptors to substantial pollutant concentrations?			✔	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				✔

Discussion: Based on related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a-b) The project would not conflict with or obstruct implementation of the Northern Sacramento Valley Planning Area (NSVPA) 2018 Triennial Air Quality Attainment Plan for Northern Sacramento Valley Air Basin as adopted by Shasta County, or any other applicable air quality plan. The telecommunications facility would use a 30kw diesel generator to ensure continued operations in the event of a power failure. The wireless communications facility would be unmanned and require only infrequent maintenance visits.

The NSVPA Air Quality Attainment Plan (2018) designates Shasta County as an area of Nonattainment with respect to the ozone California ambient air quality standards. Nitrogen oxides (NOx) are a group of highly reactive gasses and are also known as "oxides of nitrogen." Because NOx is an ingredient in the formation of ozone, it is referred to as an ozone precursor. NOx is emitted from combustion sources such as cars, trucks and buses, power plants, and off-road equipment. Construction equipment and activities associated with making probable improvements would generate air contaminants, including oxides of nitrogen (NOx), reactive organic gases (ROG), carbon dioxide (CO2) and particulate matter (PM10), in the form of engine exhaust and fugitive dust. However, the emissions emitted during construction would be limited and temporary. The Shasta County AQMD, Rule 3:28, is intended to limit emissions of NOx and carbon monoxide (CO) from stationary internal combustion engines. However, the proposed 30kW (49hp) backup generator does not meet the minimum 50 brake horsepower (bhp) engine rating to fall under the

provision of this rule.

In addition, the Shasta County General Plan requires Standard Mitigation Measures and Best Available Mitigation Measures on all discretionary land use applications as recommended by the AQMD in order to mitigate both direct and indirect emissions of non-attainment pollutants. Application of this requirement in combination with the limited scope of improvements and limited daily vehicle trips projected with post-project development will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard and would not conflict with or obstruct implementation of the NSVPA Air Quality Attainment Plan (2018) as adopted by Shasta County, or any other applicable air quality plan.

c) The nearest sensitive receptors would be the residences located to the east and southeast of the proposed wireless facility approximately 600 feet to 700 feet away. Substantial pollutant concentrations are not anticipated due to the limited scope and duration of construction. Post-construction, the wireless communications facility would be unmanned and require only infrequent maintenance visits. As identified above, the proposed 30kw diesel generator would be used only in the event of power failure to ensure continued operations. As a result, exposure of sensitive receptors to substantial pollutant concentrations would be less-than-significant.

d) The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Mitigation/Monitoring: None proposed.

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

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Biological Resources Assessment prepared by HELIX Environmental Planning, Inc. (2019), the following findings can be made:

a) According to the records search, 39 listed and/or special-status plants have the potential to occur onsite or in the vicinity of the study area (CDFW 2019). Based on field observations, published information, and literature review, 6 special-status plant species have the potential to occur within the study area. These include: big-scale balsamroot (Balsamorhiza macrolepis), northern clarkia (Clarkia borealis ssp. borealis), Red Bluff dwarf rush (Juncus leiospermus var. leiospermus), Shasta clarkia (Clarkia borealis ssp. arida), Butte County fritillary (Fritillaria eastwoodiae), and dubious pea (Lathyrus sulphureus var. argillaceus).

According to the records search, 51 listed and/or special-status wildlife species have the potential to occur onsite or in the vicinity of the study area (CDFW 2019). Based on field observations, published information, and literature review, 10 special-status wildlife species have the potential to occur within the study area. These include: Franklin's bumblebee (Bombus franklini), Suckley's cuckoo bumblebee (Bombus suckleyi), western bumblebee (Bombus occidentalis), Lewis's woodpecker (Melanerpes lewis), oak titmouse (Baeolophus inornatus), purple martin (Progne subis), yellow-billed magpie (Pica nuttalli), long-eared myotis (Myotis evotis), pallid bat (Antrozous pallidus), and silver-haired bat (Lasionycteris noctivagans). In addition to these special-status wildlife species, other birds and raptors protected under federal, State and local laws/policies also have potential to occur and nest within the study area.

No special-status plants or special-status wildlife species were observed within the study area during the field survey on November 22, 2019. However, as suitable habitat is present for several special-status plant and wildlife species and these species may potentially occur within the study area, mitigation measures are proposed. With the mitigation measures being proposed, the project would have a less-than-significant impact on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

b) There is no riparian habitat or other sensitive natural community in the project disturbance area or immediate vicinity. Clough Creek runs through the subject property approximately 1,500 feet west of the proposed wireless facility. Clough Creek will not be disturbed or impacted by the proposed project.

c) There are no vernal pools or wetlands identified on the subject property based on the Vernal Pools, Wetlands, and Waterways Map of Shasta County prepared by the Geographic Information Center, California State University, Chico, on August 24, 1996. The Biological Resources Assessment identified a wetland swale southeast of the proposed wireless facility approximately 130 feet away, outside of the disturbance area of the proposed project. The wetland swale will not be disturbed or impacted by the proposed project. There are no hydric soils in the project disturbance area.

d) There are no stream corridors in the immediate project vicinity. The nearest stream is Clough Creek located approximately 1,500 feet west of the proposed facility. Although some wildlife species may utilize portions of the study area for foraging, breeding, or other functions, the study area itself does not link two significant natural areas and is not considered a wildlife migration corridor. The study area is bordered by SR 299 to the north and rural residential properties occur in the surrounding vicinity. Large portions of undeveloped land occur outside of the study area and wildlife are much more likely to utilize these habitats away from human activity as movement or migration corridors. The project would not interfere with any native resident or migratory fish or wildlife species, nor impede the use of native wildlife nursery sites.

e) As currently designed, the proposed project will not remove or significantly impact any trees. However, minor impacts may occur to the tree canopy that overhangs the access road and AT&T lease area if pruning of limbs to allow for vehicular or equipment access must occur. All recommended protection measures of the Biological Resources Assessment for all trees within the study area have been incorporated as conditions of approval. These protection measures include the requirement that pruning of living limbs or roots over two inches in diameter be done under the supervision of an ISA-Certified Arborist. The project would not conflict with any ordinances or policies which protect biological resources.

f) There are no adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plans for the project site or project area.

Mitigation/Monitoring: With the implementation of the following mitigation measures, the biological resources impacts of the project would be less-than-significant.

Special-Status Plants

IV.a.1) A qualified botanist/biologist shall conduct special-status plant surveys within the appropriate identification period for species with potential to occur within the study area, namely big-scale balsamroot (Balsamorhiza macrolepis), northern clarkia (Clarkia borealis ssp. borealis), Red Bluff dwarf rush (Juncus leiospermus var. leiospermus), Shasta clarkia (Clarkia borealis ssp. arida), Butte County fritillary (Fritillaria eastwoodiae), and dubious pea (Lathyrus sulphureus var. argillaceus). The surveys shall take place prior to the initiation of any ground disturbing activities.

a. If no special-status plants are observed within the study area, then a letter report documenting the survey results shall be prepared and provided to the project proponent and County for their records.

b. If special-status plants are observed within the study area, then the location of the special status plants shall be marked with pin flags or other highly visible markers and may also be marked by GPS. All special status plants to be avoided within the study area shall have exclusion fencing or other highly visible material marking the avoidance area and the avoidance area shall remain in place throughout the entire construction period.

c. If the special-status plants cannot be avoided by construction, then the project proponent shall consult with the California Department of Fish and Wildlife and/or the United States Fish and Wildlife Service as appropriate, and depending on the status of the species in question, to determine appropriate measures to mitigate for the loss of special-status plant populations within the study area. These measures may include gathering seed from impacted populations for planting within nearby appropriate habitat, preserving or enhancing existing offsite populations of the plant species affected by the project, or restoring suitable habitat for special-status plant species habitat as directed by the regulatory agencies.

IV.a.2) Prior to commencement of work activities, a designated botanist/biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include information on identifying special-status plant species, their ecology and habitat requirements, the project boundaries, and the avoidance and minimization measures to be followed to avoid documented populations of special-status plant species within the project footprint. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County.

Special-Status Birds and Other Birds and Raptors

IV.a.3) To avoid impacts to nesting migratory birds and/or raptors, all vegetation removal and other ground disturbing activities should occur between September 1 and January 31 when birds are not nesting, if feasible; or

IV.a.4) If construction activities occur during the nesting season, a qualified biologist shall conduct a nesting bird survey to determine the presence of any active nests within the study area. Additionally, the surrounding 500 feet of the study area shall be surveyed for active raptor nests, where accessible, and with binoculars as necessary. The nesting bird survey shall be conducted within 14 days prior to commencement of ground-disturbing or other development activities.

a. If the nesting bird survey shows that there is no evidence of active nests, then a letter report shall be prepared to document the survey and be provided to the project proponent and County. If development does not commence within 14 days of the nesting bird survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

b. If active nests are found, then the qualified biologist shall establish a species-specific buffer to prohibit development activities near the nest and to minimize nest disturbance until the young have successfully fledged or the biologist determines that the nest is no longer active. Buffer distances may range from 30 feet for some songbirds and up to 250 to 500 feet for most raptors. Nest monitoring may also be warranted during certain phases of development to ensure nesting birds are not adversely impacted.

c. If active nests are found within any trees slated for removal or pruning, then an appropriate buffer shall be established around the tree and all trees within the buffer shall not be removed until a qualified biologist determines that the nest has successfully fledged and/or is no longer active.

IV.a.5) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special status bird species and nests, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the nesting bird season (September 1 to January 31) a nesting bird survey and environmental training for nesting birds would not be required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.

Special-Status Bats

IV.a.6) Any vegetation removal or construction on the property should occur between September 1 - October 15 and between March 1 - March 31 to avoid the bat maternity season as well as the winter season when bats are torpor and are inactive; or

IV.a.7) If vegetation removal or construction activities occur during the bat maternity season (April 1 - August 31) or the bats torpor period (October 16 - February 28) then a preconstruction bat roost survey shall be conducted by a qualified biologist within 14 days prior to development or ground disturbing activities including grading, vegetation clearing, tree removal or trimming, or construction. The surrounding 100 feet of the study area shall also be surveyed for roosting bats, where accessible.

a. If no signs of bats are observed, then a letter report shall be prepared to document the survey and provided to the project proponent and County. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to resuming or starting work.
b. If special-status bats are present and roosting in the study area or the surrounding 100 feet of the study area, the qualified biologist shall establish an appropriate no disturbance buffer around the roost site prior to the commencement of ground disturbing activities or development. At a minimum, no trees shall be removed or trimmed until the biologist has determined that a roost site is no longer active and no bats are present. Additional mitigation measures for bat species, such as installation of bat boxes or alternate roost structures, may be recommended if special-status bat species are found to be roosting within the study area.

IV.a.8) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special-status bat species, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the bat maternity season (April 1 - August 31) or the bats torpor period (October 16 - February 28) then a preconstruction bat roost survey and environmental training for special status bat species would not be required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.

Special-Status Bumblebees

IV.a.9) To avoid impacts to special-status bumblebees, all vegetation removal and other ground disturbing activities should occur during the dormant season (generally November through February) to the extent feasible; or

IV.a.10) If ground disturbing activities cannot be completed during the dormant season, a qualified biologist shall conduct a pre-construction survey for bumblebee colonies within 14 days prior to ground disturbing activities including grading, vegetation clearing, tree removal or trimming, or construction.

a. If no bumblebee colonies are observed, then a letter report shall be prepared to document the survey and provided to the project proponent and County. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to resuming or starting work.

b. If a special-status bumblebee colony is observed, a qualified biologist shall establish a no disturbance buffer around the colony site prior to the commencement of ground disturbing activities and agency consultation may be required. If agency consultation is required, all agency recommendations and mitigation requirements should be followed.

IV.a.11) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special-status bumblebees, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the bumblebee dormant season (generally November through February) then a preconstruction special-status bumblebee survey and environmental training for special status bumblebees would not be required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.

V. CULTURAL RESOURCES – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a				

V. CULTURAL RESOURCES – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
historical resource pursuant to §15064.5?				✔
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?				✔
c) Disturb any human remains, including those interred outside of formal cemeteries?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a-b) No historical or cultural resources were discovered during construction of the existing wireless telecommunications facility in the project vicinity. There are no evident above surface historical or cultural resources present within the property. The project would not cause a substantial adverse change in the significance of an historical resource or archeological resource.

In accordance with Public Resources Code (PRC) Section 21080.3.1, the Wintu Tribe of Northern California and Toyon-Wintu Center (Tribe) filed and Shasta County received a request for formal notification of proposed projects within an area of Shasta County that is traditionally and culturally affiliated with the Tribe. Pursuant to PRC §21080.3.1 the Department of Resource Management sent a certified letter to notify the Tribe that the project was under review and to provide the Tribe 30 days from the receipt of the letter to request formal consultation on the project in writing. To date, no response has been received.

c) The project site is not on or adjacent to any known cemetery or burial area. Therefore, there is no evidence to suggest that the project would disturb any human remains.

Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and provided no comments on the project.

Although there is no evidence to suggest that the project would result in any significant effect to historical, archeological, paleontological, or unique geologic resource, or human remains, there is always the possibility that such resources or remains could be encountered. Therefore, a condition of approval will require that if, in the course of development, any archaeological, historical, or paleontological resources are uncovered, discovered or otherwise detect¬ed or observed, mineral exploration activities in the affected area shall cease and a qualified archaeologist shall be contacted to review the site and advise the County of the site's significance. If the findings are deemed significant by the Environmental Review Officer, appropriate mitigation shall be required.

Mitigation/Monitoring: None proposed.

VI. ENERGY – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?				✔
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. During construction there would be a temporary

consumption of energy resources required for the movement of equipment and materials. Compliance with local, State, and federal regulations (e.g., limit engine idling times, requirement for the recycling of construction debris, etc.) would reduce and/or minimize short-term energy demand during the project's construction to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy. During operation of the completed project, there are no unusual project characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable projects, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies.

b) The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. State and local agencies regulate the use and consumption of energy through various methods and programs. As a result of the passage of Assembly Bill 32 (AB 32) (the California Global Warming Solutions Act of 2006) which seeks to reduce the effects of Greenhouse Gas (GHG) Emissions, a majority of the state regulations are intended to reduce energy use and GHG emissions. At the local level, the City's Building Division enforces the applicable requirements of the Energy Efficiency Standards and Green Building Standards in Title 24.

Mitigation/Monitoring: None proposed.

VII. GEOLOGY AND SOILS – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake, fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publications 42. ii) Strong seismic ground shaking? iii) Seismic-related ground failure, including liquefaction? iv) Landslides?			✔	
b) Result in substantial soil erosion or the loss of topsoil?				✔
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				✔
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				✔
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?				✔
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault;

According to the Alquist-Priolo Earthquake Fault Zoning Maps for Shasta County, there is no known earthquake fault on the project site.

ii) Strong seismic ground shaking;

According to the Shasta County General Plan Section 5.1, Shasta County has a low level of historic seismic activity. The entire County is in Seismic Design Category D. According to the Seismic Hazards Assessment for the City of Redding, California, prepared by Woodward Clyde, dated July 6, 1995, the most significant earthquake at the project site may be a background (random) North American crustal event up to 6.5 on the Richter scale at distances of 10 to 20 km. All structures shall be constructed according to the seismic requirements of the currently adopted Building Code.

iii) Seismic-related ground failure, including liquefaction;

The project site is located in the South Central Region (SCR), which is identified as an area of potential liquefaction in Section 5.1 of the Shasta County General Plan. The currently adopted Building Code requires preparation and review of a site specific soils report as part of the building design and approval process. The soils report must be prepared by a California registered professional engineer and would address potential seismic-related ground failure concerns, if any.

iv) Landslides.

There is no evidence of landslides on the subject property or the surrounding area. The site is gently sloped and is not located at the top or toe of any significant slope. Therefore, impacts from landslides are considered to be less-than-significant.

b) The Soil Survey of Shasta County, completed by the United States Department of Agriculture, Soil Conservation Service and Forest Service in August, 1974, identified the soils on the project site as Clough gravelly loam, 3 to 8% slopes, with a hazard of erosion ranging from slight to moderate; Redding gravelly loam, 3 to 8% slopes, with a hazard of erosion ranging from slight to moderate; Newtown stony loam, 8 to 50% slopes, eroded, with a hazard of erosion ranging from moderate to rapid; and Red Bluff gravelly loan, moderately deep, 0 to 3% slopes, with a hazard of erosion ranging from none to slight. The proposed wireless facility would be constructed on the soil with the classification of Clough gravelly loam, 3 to 8% slopes. A grading permit is required prior to any grading activities. The grading permit includes requirements for erosion and sediment control, including retention of topsoil.

c) The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The site is gently sloped and is not located at the top or toe of any significant slope. Based on the construction of the existing wireless facility and other construction in the vicinity, there is no evidence to support a conclusion that the project is on a geologic unit or soil that is unstable.

d) The project would not be located on expansive soil creating substantial direct or indirect risks to life or property. All soil classifications found on the project site have a low shrink-swell potential per the "Soil Survey of Shasta County." Site soils are not described as expansive

e) No wastewater treatment is required for this project.

f) There are no known unique paleontological resources or sites or unique geologic features in the project vicinity.

Mitigation/Monitoring: None proposed.

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

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a-b) In 2005, the Governor of California signed Executive Order S-3-05, establishing that it is the State of California's goal to reduce

statewide greenhouse gas (GHG) emission levels. Subsequently, in 2006, the California State Legislature adopted Assembly Bill AB 32, the California Global Warming Solutions Act. In part, AB 32 requires the California Air Resources Board to develop and adopt regulations to achieve a reduction in the State's GHG emissions to year 1990 levels by year 2020.

California Senate Bill 97 established that an individual project's effect on GHG emission levels and global warming must be assessed under CEQA. SB 97 further directed that the State Office of Planning and Research (OPR) develop guidelines for the assessment of a project's GHG emissions. Those guidelines for GHG emissions were subsequently included as amendments to the CEQA Guidelines. The guidelines did not establish thresholds of significance and there are currently no state, regional, county, or city guidelines or thresholds with which to direct project-level CEQA review. As a result, Shasta County reserves the right to use a qualitative and/or quantitative threshold of significance until a specific quantitative threshold is adopted by the state or regional air district.

The City of Redding currently utilizes a quantitative non-zero project-specific threshold based on a methodology recommended by the California Air Pollution Officers Association (CAPCOA) and accepted by the California Air Resources Board. According to CAPCOA's Threshold 2.3, CARB Reporting Threshold, 10,000 metric tons of carbon-dioxide equivalents per year (mtC02eq/yr) is recommended as a quantitative non-zero threshold. This threshold would be the operational equivalent of 550 dwelling units, 400,000 square feet of office use, 120,000 square feet of retail, or 70,000 square feet of supermarket use. This approach is estimated to capture over half the future residential and commercial development projects in the State of California and is designed to support the goals of AB 32 and not hinder it. The use of this quantitative non-zero project-specific threshold by Shasta County, as lead agency, would be consistent with certain practices of other lead agencies in the County and throughout the State of California.

The United States Environmental Protection Agency (EPA) identifies four primary constituents that are most representative of the GHG emissions. They are:

- Carbon Dioxide (C02): Emitted primarily through the burning of fossil fuels. Other sources include the burning of solid waste and wood and/or wood products and cement manufacturing.
- Methane (CH4): Emissions occur during the production and transport of fuels, such as coal and natural gas. Additional emissions are generated by livestock and agricultural land uses, as well as the decomposition of solid waste.
- Nitrous Oxide (N20): The principal emitters include agricultural and industrial land uses and fossil fuel and waste combustion.
- Fluorinated Gases: These can be emitted during some industrial activities. Also, many of these gases are substitutes for ozone-depleting substances, such as CFC's, which have been used historically as refrigerants. Collectively, these gases are often referred to as "high global-warming potential" gases.

The primary generators of GHG emissions in the United States are electricity generation and transportation. The EPA estimates that nearly 85 percent of the nation's GHG emissions are comprised of carbon dioxide (C02). The majority of C02 is generated by petroleum consumption associated with transportation and coal consumption associated with electricity generation. The remaining emissions are predominately the result of natural-gas consumption associated with a variety of uses.

With regard to the project, proposed operational emission are significantly less than the quantitative non-zero project-specific thresholds described above. The proposed 30kW backup generator will be used only for backup power in emergency situations. The scope of the proposed project improvements will not involve a significant number of equipment hours to complete and would not generate significant traffic volumes during construction. Post-construction, the wireless communications facility would be unmanned and require only infrequent maintenance visits which are not expected to generate significant GHG emissions. Therefore, the project is not expected to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, nor would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation/Monitoring: None proposed.

IX. <u>HAZARDS AND HAZARDOUS MATERIALS</u>: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				✔
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✔
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✔
d) Be located on a site which is included on a list of hazardous				✔

IX. **HAZARDS AND HAZARDOUS MATERIALS:** Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✔
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✔
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				✔

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Radio Frequency Emissions Compliance Report prepared by Waterford Consultants (2019), the following findings can be made:

a) The project would not require routine transport, use or disposal of hazardous materials and, therefore, would not result in a significant hazard to the public or the environment.

Based on information provided by AT&T Mobility and predictive modeling, the proposed project will be compliant with Radiofrequency Radiation Exposure Limits of 47 C.F.R. §§ 1.1307(b)(3) and 1.1310. RF alerting signage and restricting access to the monopole to authorized climbers that have completed RF safety training is required for occupational environment compliance. The proposed operation will not expose members of the general public to hazardous levels of RF energy and will not contribute to existing cumulative maximum permissible exposure levels on walkable surfaces at ground or in adjacent buildings by 5% of the general population limits.

b) Hazardous materials such as industrial fuels, oils, and solvents may be stored at the site during construction. Diesel fuel will be stored onsite for powering the backup generator proposed. The site will also store up to twelve 12V batteries inside the proposed equipment shelter for emergency backup power. If it is necessary to store such material in reportable quantities, the operator and/or contractor would have to prepare and submit a hazardous materials business plan to the Shasta County Environmental Health Division (SCEHD) for review and approval. A hazardous substance is reportable if stored at or above 55 gallons for liquids; 200 cubic feet for compressed gas; or 500 pounds for solids. Additionally, the applicant shall comply with all hazardous waste generator regulations, including reporting their status as a hazardous waste generator to SCEHD. The conditions of approval for the project would include a standard condition requiring compliance with this regulatory requirement. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) The project is not located within one-quarter mile of an existing or proposed school.

d) The project is not located on a site which is included on a list of hazardous materials sites compiled by the California Department of Toxic Substances Control pursuant to Government Code Section 65962.5.

e) The project is not located within an airport land use plan or within two miles of a public airport or public use airport.

f) A review of the project and the Shasta County and City of Anderson Multi-jurisdictional Hazard Mitigation Plan indicates that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g) The project is located in an area designated as "Very High" fire hazard severity zone. All improvements will be required to be constructed in accordance with the Shasta County Fire Safety Standards. These standards also require the clearing of combustible vegetation around all structures for a distance of not less than 30 feet on each side or to the property line. The California Public Resources Code Section 4291 includes a "Defensible Space" requirement of clearing 100 feet around all buildings or to the property line, whichever is less. The wireless communications facility will be unmanned and requires only infrequent maintenance visits. The project will not substantially increase the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Mitigation/Monitoring: None proposed.

X. HYDROLOGY AND WATER QUALITY: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✔	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.				✔
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site: (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flows?			✔	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				✔
e) Conflict with or obstruct implementation of a water quality control plan or sustainable management plan?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The wireless communications facility would be unmanned and no additional water demand is proposed with this project. Through adherence to construction standards, including erosion and sediment control measures, water quality and waste discharge standards will not be violated. Grading will be needed for this project and a grading permit will be required. The provisions of the grading permit will address erosion and siltation containment on- and off-site.

The Central Valley Regional Water Quality Control Board commented on the project, stating construction activity resulting in a land disturbance of one acre or more must obtain coverage under the General Permit for Storm Water Discharges associated with Construction and Land Disturbance Activities (CGP). The Regional Board requires the project to be conditioned such that storm water pollution control measures during construction and post-construction will be implemented if the disturbance area is one or more acres. The project, as proposed, will disturb less than one acre.

b) The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project does not propose any new well(s). The project would not significantly increase impervious surface area within the project site to the extent that it would cause interference with groundwater recharge. The wireless communications facility would be unmanned and no additional water demand is proposed with this project.

c) The project would not substantially alter the existing drainage pattern of the site or area in a manner which would (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flows. Soil disturbance is limited to the 35-foot by 30-foot equipment compound and lease area and removal and replacement of up to approximately 44.22 cubic yards of soil for trenching associated with placing a 4-inch conduit underground for power.

d) The project is not in a flood hazard, tsunami, or seiche zone.

e) Through adherence to construction standards, and the provisions of the required grading permit, including erosion and sediment control measures, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable management plan.

Mitigation/Monitoring: None proposed.

XI. LAND USE AND PLANNING - Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Physically divide an established community?				✔
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			✔	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Collocation and Height Analysis Report prepared by Epic Wireless Group, LLC (2019), the following findings can be made:

a) The project would not physically divide an established community. The project does not include the creation of any road, ditch, wall, or other feature which would physically divide an established community.

b) The project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project is consistent with the RA General Plan land use designation, the U zone district of the project site and is consistent with Chapter 17.88.282 of the Shasta County Code, "Wireless Telecommunication Facilities," except section 17.88.282.D.2.c. as the location of the proposed tower is within 1,500 feet of an existing telecommunication tower.

The proposed tower would be placed within 300 feet of an existing tower on-site. The close proximity of the towers is being proposed so the viewshed will not be any significantly more obstructed than it was before from the existence of the original tower, and still provide enough buffer area that the towers will not interfere with one another. Section 17.88.282.D.2.c. requires that no wireless telecommunication facility shall be placed within 1,500 of an existing wireless telecommunication facility unless environmental documentation verifies that a concentration of towers in close proximity will not have a cumulative adverse impact on the visual character or quality of the site and its surroundings. The applicant has submitted a Collocation and Height Analysis and photo simulations. With the proposed mitigation in Section I. Aesthetics requiring the tower to be designed as a monopine, the surrounding topography, existing tree canopy, large size of the property, general standards for wireless telecommunication facilities and review of the documents submitted, the proposed wireless facility would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Mitigation/Monitoring: None proposed.

XII. MINERAL RESOURCES – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✔
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local General Plan, specific plan or other land use plan?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) There are no known mineral resources of regional value located on or near the project site. The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.

b) The project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The project site is not identified in the General Plan Minerals Element as containing a locally-important mineral resource. There is no other land use plan which addresses minerals.

Mitigation/Monitoring: None proposed.

XIII. NOISE – Would the project result in:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✔	
b) Generation of excessive groundborne vibration or groundborne noise levels			✔	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Noise Compliance Report prepared by Waterford Consultants (2019), the following findings can be made:

a) Per the Shasta County Code Section, 17.88.282.D.4, wireless facilities shall be constructed and operated in compliance with the standards of the Shasta County General Plan Noise Element and implementing ordinances and standards. Per the County's General Plan, noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table N-IV of the Shasta County General Plan as measured immediately within the property line of lands designated for noise-sensitive uses. These noise level performance standards for non-transportation sources are 55dB hourly L_{eq} for daytime (7:00 a.m. to 10:00 p.m.) hours and 50dB hourly L_{eq} for nighttime (10:00 p.m. to 7:00 a.m.) hours. To present a conservative analysis, the noise modeling has assumed a 'worst case' scenario: 1) that both the AC unit and the generator are in simultaneous operation during any hour; and 2) the generator operates in the full-load condition. The noise analysis concluded that the proposed project would meet the Shasta County Noise Element Noise Level Standards for Non-Transportation Sources at all property lines. There will also be increased noise levels during construction of the tower. However, due to the short duration of construction, the temporary increase in ambient noise levels in the vicinity of the projects is expected to be less than significant.

b) The project would not result in generation of excessive groundborne vibration or groundborne noise levels. The project is limited in scope to the construction of the new wireless facility. Any groundborne vibration or noise levels as a result of excavation of footings for the tower or trenching for the underground power are expected to be less than significant.

c) The project is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport.

Mitigation/Monitoring: None proposed.

XIV. POPULATION AND HOUSING – Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✔
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project does not include the development of new homes or businesses, nor does it include the extension of any permanent roads or other infrastructure, nor would any new jobs be created as a result of the project. Therefore, the project is not expected to

induce substantial growth in the area.

b) The project would not displace existing housing, necessitating the construction of replacement housing elsewhere. The project does not include destruction of any existing housing.

Mitigation/Monitoring: None proposed.

XV. PUBLIC SERVICES: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
Fire Protection?				✔
Police Protection?				✔
Schools?				✔
Parks?				✔
Other public facilities?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

Fire Protection:

The project is located in a "Very High" fire hazard severity zone. However, no significant additional level of fire protection is necessary.

Police Protection:

The County has a total of 147 sworn and 119 non-sworn County peace officers (Sheriff's deputies) for the approximate County population of 65,228 (California. Department of Finance 2019) persons in the unincorporated area of the County. That is a ratio of one officer per 245 persons. The wireless communications facility would be unmanned and require only infrequent maintenance visits. The proposed wireless telecommunications facility would be enclosed by a 6-foot tall chain link fence with three strands of ant-climb barrier. The project is not expected to require any significant additional level of police protection.

Due to the rural nature of this area, the tower will also include the FirstNet program. FirstNet is a single, nationwide network strictly dedicated to public safety communications. In times of emergency or planned public events when the data capacity is full, FirstNet will throttle the data to provide the needed bandwidth to public safety workers. This network will allow first responders and public safety workers to send and receive voice, data, and text without concerns of network congestion.

Schools:

The communication facility is an unmanned facility and therefore will not result in an increase in demand for school facilities in the area.

Parks:

The County does not have a neighborhood parks system.

Other public facilities:

The communication facility is an unmanned facility and therefore will not require other public services.

Mitigation/Monitoring: None proposed.

XVI. **RECREATION**:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				✔
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The County does not have a neighborhood or regional parks system or other recreational facilities.

b) The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Mitigation/Monitoring: None proposed.

XVII. **TRANSPORTATION**: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				✔
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				✔
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✔
d) Result in inadequate emergency access?				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not conflict with a program, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project site is accessed from State Highway 299E. There is an existing access road to the existing wireless facility onsite that would be utilized for accessing the proposed wireless facility. The wireless communications facility would be unmanned and require only infrequent maintenance visits. The project would not generate enough traffic to significantly reduce the volume-to-capacity ratio of adjacent roadways to a reduced level of service.

b) The project would not exceed, either individually or cumulatively, a level-of-service standard established by the County congestion management agency for designated roads or highway. There is no County congestion management agency, and no level-of-service established by such an agency.

c) The project would not substantially increase hazards due to a geometric design feature or incompatible uses. The project does not propose any new roads.

d) The project would not result in inadequate emergency access. The project has been reviewed by the Shasta County Fire Department which has determined that there is adequate emergency access.

Mitigation/Monitoring: None proposed.

XVIII. TRIBAL CULTURAL RESOURCES: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				✔

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The project would not cause a substantial adverse change in the significance of a tribal cultural resource as there is no evidence of historical resources at the site that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources; or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

Mitigation/Monitoring: None proposed.

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects?			✓	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				✓
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has				✓

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				✓
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✓

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects. The wireless communications facility would be unmanned and not require wastewater treatment, water service, solid waste disposal service, and have minimal impact to storm water drainage. The project would involve routing a 4-inch underground conduit for power a distance of ± 199 lineal feet requiring the removal and replacement of approximately 44.22 cubic yards of soil for trenching. A grading permit is required prior to any grading activities. Through adherence to construction standards, and the provisions of the required grading permit, potential environmental effects associated with the trenching for the underground conduit would be less-than-significant.

b) The project would have no demand for water supply. The facility would be unmanned and require only infrequent maintenance visits.

c) The project would not require wastewater treatment. The facility would be unmanned and require only infrequent maintenance visits.

d) The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The wireless communications facility would be unmanned and require only infrequent maintenance visits.

e) The project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste. The wireless communications facility would be unmanned and require only infrequent maintenance visits.

Mitigation/Monitoring: None proposed.

XX. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✓
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✓
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✓

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a) A review of the project and the Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan, and the Shasta County Emergency Operations Plan, indicates that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

b) The project would not due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

c) The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

d) The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Mitigation/Monitoring: None proposed.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			✓	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			✓	

Discussion:

a) Based on the discussion and findings in Section I. Aesthetics, and Section IV. Biological Resources, there is evidence to support a finding that the project would 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 the self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

With the incorporation of mitigation measures into the project specified in Section I. Aesthetics, and Section IV. Biological Resources, the impacts would be less-than-significant.

Based on the discussion and findings in Section V. Cultural Resources, there is no evidence to support a finding that the project would have the potential to eliminate important examples of the major periods of California history or prehistory.

b) Based on the discussion and findings in all Sections above, there is no evidence to suggest that the project would have significant impacts that are cumulatively considerable.

c) Based on the discussion and findings in all Sections above, there is no evidence to support a finding that the project would have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation/Monitoring: With the mitigation measures being proposed, the impacts will be less-than-significant. See the attached

Mitigation Monitoring Program (MMP) for a complete listing of the proposed mitigation measures, timing/implementation of the measures, and enforcement/monitoring agent.

INITIAL STUDY COMMENTS

PROJECT NUMBER Use Permit 19-0010 – AT&T Mobility

GENERAL COMMENTS:

Special Studies: The following project-specific studies have been completed for the proposal and will be considered as part of the record of decision for the Mitigated Negative Declaration. These studies are available for review through the Shasta County Planning Division.

1. Biological Resources Assessment, HELIX Environmental Planning, Inc., December 2019
2. Collocation and Height Analysis, Epic Wireless Group, LLC, December 17, 2019
3. Noise Compliance Report, Waterford Consultants, November 22, 2019
4. Radio Frequency Emissions Compliance Report, Waterford Consultants, October 10, 2019

Agency Referrals: Prior to an environmental recommendation, referrals for this project were sent to agencies thought to have responsible agency or reviewing agency authority. The responses to those referrals (attached), where appropriate, have been incorporated into this document and will be considered as part of the record of decision for the Mitigated Negative Declaration. Copies of all referral comments may be reviewed through the Shasta County Planning Division. To date, referral comments have been received from the following State agencies or any other agencies which have identified CEQA concerns:

1. Department of Fish and Wildlife, Region 1 – Northern

Conclusion/Summary: Based on a field review by the Planning Division and other agency staff, early consultation review comments from other agencies, information provided by the applicant, and existing information available to the Planning Division, the project, as revised and mitigated, is not anticipated to result in any significant environmental impacts.

SOURCES OF DOCUMENTATION FOR INITIAL STUDY CHECKLIST

All headings of this source document correspond to the headings of the initial study checklist. In addition to the resources listed below, initial study analysis may also be based on field observations by the staff person responsible for completing the initial study. Most resource materials are on file in the office of the Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001, Phone:(530) 225-5532.

GENERAL PLAN AND ZONING

1. Shasta County General Plan and land use designation maps.
2. Applicable community plans, airport plans and specific plans.
3. Shasta County Zoning Ordinance (Shasta County Code Title 17) and zone district maps.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

1. Shasta County General Plan, Section 6.8 Scenic Highways, and Section 7.6 Design Review.
2. Zoning Standards per Shasta County Code, Title 17.

II. AGRICULTURAL AND FORESTRY RESOURCES

1. Shasta County General Plan, Section 6.1 Agricultural Lands.
2. Shasta County Important Farmland 2016 Map, California Department of Conservation.
3. Shasta County General Plan, Section 6.2 Timber Lands.
4. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.

III. AIR QUALITY

1. Shasta County General Plan Section, 6.5 Air Quality.
2. Northern Sacramento Valley Air Basin, 2018 Air Quality Attainment Plan.
3. Records of, or consultation with, the Shasta County Department of Resource Management, Air Quality Management District.

IV. BIOLOGICAL RESOURCES

1. Shasta County General Plan, Section 6.2 Timberlands, and Section 6.7 Fish and Wildlife Habitat.
2. Designated Endangered, Threatened, or Rare Plants and Candidates with Official Listing Dates, published by the California Department of Fish and Wildlife.
3. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.
4. Federal Listing of Rare and Endangered Species.
5. Shasta County General Plan, Section 6.7 Fish and Wildlife Habitat.
6. State and Federal List of Endangered and Threatened Animals of California, published by the California Department of Fish and Wildlife.
7. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.

V. CULTURAL RESOURCES

1. Shasta County General Plan, Section 6.10 Heritage Resources.
2. Records of, or consultation with, the following:
   a. The Northeast Information Center of the California Historical Resources Information System, Department of Anthropology, California State University, Chico.
   b. State Office of Historic Preservation.
   c. Local Native American representatives.
   d. Shasta Historical Society.

VI. ENERGY

1. California Global Warming Solutions Acto of 2006 (AB 32)
2. California Code of Regulations Title 24, Part 6 – California Energy Code
3. California Code of Regulations Title 24, Part 11 – California Green Building Standards Code (CALGreen)

VII. GEOLOGY AND SOILS

1. Shasta County General Plan, Section 5.1 Seismic and Geologic Hazards, Section 6.1 Agricultural Lands, and Section 6.3 Minerals.
2. County of Shasta, Erosion and Sediment Control Standards, Design Manual
3. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.
4. Alquist - Priolo, Earthquake Fault Zoning Maps.

VIII. GREENHOUSE GAS EMISSIONS

1. Shasta Regional Climate Action Plan
2. California Air Pollution Control Officers Association (White Paper) CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act

IX. HAZARDS AND HAZARDOUS MATERIALS

1. Shasta County General Plan, Section 5.4 Fire Safety and Sheriff Protection, and Section 5.6 Hazardous Materials.
2. County of Shasta Multi-Hazard Functional Plan
3. Records of, or consultation with, the following:
   a. Shasta County Department of Resource Management, Environmental Health Division.
   b. Shasta County Fire Prevention Officer.
   c. Shasta County Sheriff's Department, Office of Emergency Services.
   d. Shasta County Department of Public Works.
   e. California Environmental Protection Agency, California Regional Water Quality Control Board, Central Valley Region.

X. HYDROLOGY AND WATER QUALITY

1. Shasta County General Plan, Section 5.2 Flood Protection, Section 5.3 Dam Failure Inundation, and Section 6.6 Water Resources and Water Quality.
2. Flood Boundary and Floodway Maps and Flood Insurance Rate Maps for Shasta County prepared by the Federal Emergency Management Agency, as revised to date.
3. Records of, or consultation with, the Shasta County Department of Public Works acting as the Flood Control Agency and Community Water Systems manager.

XI. LAND USE AND PLANNING

1. Shasta County General Plan land use designation maps and zone district maps.
2. Shasta County Assessor's Office land use data.

XII. MINERAL RESOURCES

3. Shasta County General Plan Section 6.3 Minerals.

XIII. NOISE

1. Shasta County General Plan, Section 5.5 Noise and Technical Appendix B.

XIV. POPULATION AND HOUSING

1. Shasta County General Plan, Section 7.1 Community Organization and Development Patterns.
2. Census data from U.S. Department of Commerce, Bureau of the Census.
3. Census data from the California Department of Finance.
4. Shasta County General Plan, Section 7.3 Housing Element.
5. Shasta County Department of Housing and Community Action Programs.

XV. PUBLIC SERVICES

1. Shasta County General Plan, Section 7.5 Public Facilities.
2. Records of, or consultation with, the following:
   a. Shasta County Fire Prevention Officer.
   b. Shasta County Sheriff's Department.
   c. Shasta County Office of Education.
   d. Shasta County Department of Public Works.

XVI. RECREATION

1. Shasta County General Plan, Section 6.9 Open Space and Recreation.

XVII. TRANSPORTATION/TRAFFIC

1. Shasta County General Plan, Section 7.4 Circulation.
2. Records of, or consultation with, the following:
   a. Shasta County Department of Public Works.
   b. Shasta County Regional Transportation Planning Agency.
   c. Shasta County Congestion Management Plan/Transit Development Plan.
3. Institute of Transportation Engineers, Trip Generation Rates.

XVIII. TRIBAL CULTURAL RESOURCES

1. Tribal Consultation in accordance with Public Resources Code section 21080.3.1

XIX. UTILITIES AND SERVICE SYSTEMS

1. Records of, or consultation with, the following:
   a. Pacific Gas and Electric Company.
   b. Pacific Power and Light Company.
   c. Pacific Bell Telephone Company.
   d. Citizens Utilities Company.
   e. T.C.I.
   f. Marks Cablevision.
   g. Shasta County Department of Resource Management, Environmental Health Division.

h. Shasta County Department of Public Works.

XX. WILDFIRE

1. Office of the State Fire Marshall-CALFIRE Fire Hazard Severity Zone Maps

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

None

MITIGATION MONITORING PROGRAM (MMP)
FOR USE PERMIT 19-0010 – AT&T MOBILITY

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
Section I. Aesthetics I.a.1) The entire monopine structure (including the top portion) shall replicate, to the maximum extent possible, the form of an evergreen tree in terms of shape (conical rather than symmetrical), foliage density, and branch structure and will have no less than 3 branches per lineal foot starting at not less than 15 feet above ground. The length of the artificial branches shall exceed that of the antenna arrays by a minimum of one foot and the density of the artificial foliage shall be such that the visibility of the antenna arrays are secondary to that of the monopine. Antennas and associated hardware shall be entirely screened from view by utilizing pine needle socks and other necessary methods. The pole shall be round and covered with simulated bark. The permittee shall provide samples of the bark, branches, and pine needles to the Planning Division. Building plans for the monopine facility shall include details and specifications pertaining to the appearance of the monopine. Both samples and plans are to be reviewed and approved by the Planning Director prior to building permit issuance.	Prior to Issuance of Building Permit Final Inspection of Building Permit	Resource Management, Planning Division	
I.a.2) All ancillary equipment and hardware attached to the monopine structure shall have a non-reflective finish and colored to blend in with the monopine designed structure. The ground equipment shall have a non-reflective finish and the fence or wall shall have an earth-tone color. The proposed colors shall be submitted to and approved by the Planning Director prior to building permit issuance.	Prior to Issuance of Building Permit Final Inspection of Building Permit	Resource Management, Planning Division	
I.a.3) The monopine structure (branches and bark, antennas and associated equipment), shall be maintained in good condition in terms of color, texture, and overall natural appearance. The permittee shall agree to reasonable repairs and replacement of equipment and structural and aesthetic components, due to damage caused by outdoor exposure and/or inclement weather. Under this condition, the permittee shall replace such components within 60 days of written notice by the County.	For the Life of the Use Permit	Resource Management, Planning Division	
Section IV. Biological Resources *Special-Status Plants* IV.a.1) A qualified botanist/biologist shall conduct special-status plant surveys within the appropriate identification period for species with potential to occur within the study area. The survey shall take place prior to the initiation of any ground disturbing activities.	Prior to Issuance of Building Permit Final Inspection of Building Permit	Resource Management, Planning Division / California Department of Fish and Wildlife / United States Fish and Wildlife Service	

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a. If no special-status plants are observed within the study area, then a letter report documenting the survey results shall be prepared and provided to the project proponent and County for their records. b. If special-status plants are observed within the study area, then the location of the special status plants shall be marked with pin flags or other highly visible markers and may also be marked by GPS. All special status plants to be avoided within the study area shall have exclusion fencing or other highly visible material marking the avoidance area and the avoidance area shall remain in place throughout the entire construction period. c. If the special-status plants cannot be avoided by construction, then the project proponent shall consult with the California Department of Fish and Wildlife and/or the United States Fish and Wildlife Service as appropriate, and depending on the status of the species in question, to determine appropriate measures to mitigate for the loss of special-status plant populations within the study area. These measures may include gathering seed from impacted populations for planting within nearby appropriate habitat, preserving or enhancing existing offsite populations of the plant species affected by the project, or restoring suitable habitat for special-status plant species habitat as directed by the regulatory agencies.			
IV.a.2) Prior to commencement of work activities, a designated botanist/biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include information on identifying special-status plant species, their ecology and habitat requirements, the project boundaries, and the avoidance and minimization measures to be followed to avoid documented populations of special-status plant species within the project footprint. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County.	Prior to Issuance of Building Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
Special-Status Birds and Other Birds and Raptors IV.a.3) To avoid impacts to nesting migratory birds and/or raptors, all vegetation removal and other ground disturbing activities should occur between September 1 and January 31 when birds are not nesting, if feasible; or	For the Life of the Use Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
IV.a.4) If construction activities occur during the nesting season, a qualified biologist	Prior to Issuance of Building Permit	Resource Management,	

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shall conduct a nesting bird survey to determine the presence of any active nests within the study area. Additionally, the surrounding 500 feet of the study area shall be surveyed for active raptor nests, where accessible, and with binoculars as necessary. The nesting bird survey shall be conducted within 14 days prior to commencement of ground-disturbing or other development activities. a. If the nesting bird survey shows that there is no evidence of active nests, then a letter report shall be prepared to document the survey and be provided to the project proponent and County. If development does not commence within 14 days of the nesting bird survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. b. If active nests are found, then the qualified biologist shall establish a species-specific buffer to prohibit development activities near the nest and to minimize nest disturbance until the young have successfully fledged or the biologist determines that the nest is no longer active. Buffer distances may range from 30 feet for some songbirds and up to 250 to 500 feet for most raptors. Nest monitoring may also be warranted during certain phases of development to ensure nesting birds are not adversely impacted. c. If active nests are found within any trees slated for removal or pruning, then an appropriate buffer shall be established around the tree and all trees within the buffer shall not be removed until a qualified biologist determines that the nest has successfully fledged and/or is no longer active.	Final Inspection of Building Permit For the Life of the Use Permit	Planning Division / California Department of Fish and Wildlife	
IV.a.5) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special status bird species and nests, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the nesting bird season (September 1 to January 31) a nesting bird survey and environmental training for nesting birds would not be required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.	Prior to Issuance of Building Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	

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Special-Status Bats IV.a.6) Any vegetation removal or construction on the property should occur between September 1 - October 15 and between March 1 - March 31 to avoid the bat maternity season as well as the winter season when bats are torpor and are inactive; or	For the Life of the Use Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
IV.a.7) If vegetation removal or construction activities occur during the bat maternity season (April 1 - August 31) or the bats torpor period (October 16 - February 28) then a preconstruction bat roost survey shall be conducted by a qualified biologist within 14 days prior to development or ground disturbing activities including grading, vegetation clearing, tree removal or trimming, or construction. The surrounding 100 feet of the study area shall also be surveyed for roosting bats, where accessible. a. If no signs of bats are observed, then a letter report shall be prepared to document the survey and provided to the project proponent and County. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to resuming or starting work. b. If special-status bats are present and roosting in the study area or the surrounding 100 feet of the study area, the qualified biologist shall establish an appropriate no disturbance buffer around the roost site prior to the commencement of ground disturbing activities or development. At a minimum, no trees shall be removed or trimmed until the biologist has determined that a roost site is no longer active and no bats are present. Additional mitigation measures for bat species, such as installation of bat boxes or alternate roost structures, may be recommended if special-status bat species are found to be roosting within the study area.	Prior to Issuance of Building Permit Final Inspection of Building Permit For the Life of the Use Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
IV.a.8) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special-status bat species, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the bat maternity season (April 1 - August 31) or	Prior to Issuance of Building Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	

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the bats torpor period (October 16 - February 28) then a preconstruction bat roost survey and environmental training for special status bat species would not be required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.			
Special-Status Bumblebees IV.a.9) To avoid impacts to special-status bumblebees, all vegetation removal and other ground disturbing activities should occur during the dormant season (generally November through February) to the extent feasible; or	For the Life of the Use Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
IV.a.10) If ground disturbing activities cannot be completed during the dormant season, a qualified biologist shall conduct a pre-construction survey for bumblebee colonies within 14 days prior to ground disturbing activities including grading, vegetation clearing, tree removal or trimming, or construction. a. If no bumblebee colonies are observed, then a letter report shall be prepared to document the survey and provided to the project proponent and County. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to resuming or starting work. b. If a special-status bumblebee colony is observed, a qualified biologist shall establish a no disturbance buffer around the colony site prior to the commencement of ground disturbing activities and agency consultation may be required. If agency consultation is required, all agency recommendations and mitigation requirements should be followed.	Prior to Issuance of Building Permit Final Inspection of Building Permit For the Life of the Use Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	
IV.a.11) Prior to commencement of work activities, a qualified biologist shall provide a worker environmental awareness training to all project-related personnel. The training shall include identification of special-status bumblebees, required practices before the start of construction, general measures that are being implemented to protect the species as they relate to the project, penalties for noncompliance, and boundaries of the permitted disturbance zones. Upon completion of the training, all construction personnel shall sign a form stating that they have attended the training and understand all the measures. Proof of this instruction shall be kept on file with the project proponent and County. If construction occurs outside of the bumblebee dormant season (generally November through February) then a preconstruction special-status bumblebee survey and environmental training for special status bumblebees would not be	Prior to Issuance of Building Permit	Resource Management, Planning Division / California Department of Fish and Wildlife	

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required. As applicable, the pre-construction survey and environmental training may be combined with other recommended surveys and trainings.			