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 19-0012 (AT&T Mobility)

Lead Agency: Shasta County Department of Resource Management – Planning Division Contact Person: Lio Salazar, Senior 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: Johnson Park

Cross Streets: State Highway 299 E/Rocky Ridge Road Zip Code: 96013

Lat. / Long.: 40° 55′ 28″ N/ 121° 37′ 8″ W Total Acres: 50.5

Assessor's Parcel No.: 030-140-014 Section: 3 Twp.: T.35N Range: R.3E Base: MDBM

Within 2 Miles: State Hwy #: 299 E Waterways: Burney Creek

Airports: N/A Railways: N/A Schools: N/A

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 Telecommunication Facility

Project Issues Discussed in Document:

- ☒ Aesthetic/Visual
- ☐ Agricultural Land
- ☒ Air Quality
- ☒ Archeological/Historical
- ☒ Biological Resources
- ☐ Coastal Zone
- ☒ Drainage/Absorption
- ☐ Economic/Jobs
- ☐ Fiscal
- ☐ Flood Plain/Flooding
- ☒ Forest Land/Fire Hazard
- ☒ Geologic/Seismic
- ☐ 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:

Convenience Market and Fuel Station/ Community Commercial-Design Review (C-2-DR)/ Commercial (C)

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

The project is a use permit application to construct, operate, and maintain a wireless telecommunication facility within a 30-foot by 40-foot lease area. The lease area would be surfaced with gravel and surrounded by a six-foot tall screen fence topped with a three-strand barbed wire anti-climb barrier. Proposed improvements consist of a 110-foot-tall monopine tower with a single tri-sector antenna mount outfitted with 3 panel antennas per sector, two microwave dishes, and ancillary equipment; an 8-foot by 8-foot pre-fabricated concrete equipment shelter; a 30-kilowatt diesel

generator mounted on a 5-foot by 10-foot concrete slab with a level 2 sound enclosure and integrated 190-gallon fuel tank; and an ancillary equipment pedestal. Landscaping would consist of 5-gallon holly bushes planted 15 feet on center within an 8-foot-wide landscaping easement surrounding the lease area. The proposal also includes the improvement of an approximately 350-foot gravel access road within a 15-foot access and utility easement (approximately 310 feet of the access road would be constructed over an existing dirt driveway); an approximately 360-foot underground utility run from an existing power pole and transformer; and an approximately 760-foot fiber-optic cable run from an existing telecommunications point of connection. Construction would consist of site preparation activities, including clearing, grubbing, and grading, including the removal of an 18-inch diameter pine tree and 6-inch diameter oak tree; trenching, excavation and backfilling for installation of all facility structures, ancillary equipment, fencing, utilities (electricity and fiber optic), and landscaping; application of a gravel surface over the access road and within the lease area; and re-application of paving over a portion of the gas station paved parking area that would have to be saw cut to excavate the trench for the fiber-optic run.

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
_____ Boating & Waterways, Department of
_____ California Highway Patrol
_____ CalFire
S Caltrans District # 2
_____ Caltrans Division of Aeronautics
_____ Caltrans Planning (Headquarters)
_____ Central Valley Flood Protection Board
_____ Coachella Valley Mountains Conservancy
_____ Coastal Commission
_____ Colorado River Board
_____ Conservation, Department of
_____ Corrections, Department of
_____ Delta Protection Commission
_____ Education, Department of
_____ Energy Commission
S Fish & Game Region # 1
_____ Food & Agriculture, Department of
_____ General Services, Department of
_____ Health Services, Department of
_____ Housing & Community Development
_____ Integrated Waste Management Board
_____ Native American Heritage Commission

_____ Office of Emergency Services
_____ Office of Historic Preservation
_____ Office of Public School Construction
_____ Parks & Recreation
_____ Pesticide Regulation, Department of
_____ Public Utilities Commission
S Regional WQCB # 5
_____ Resources Agency
_____ S.F. Bay Conservation & Development Commission
_____ San Gabriel & Lower L.A. Rivers and Mtns Conservancy
_____ San Joaquin River Conservancy
_____ Santa Monica Mountains Conservancy
_____ State Lands Commission
_____ SWRCB: Clean Water Grants
_____ SWRCB: Water Quality
_____ SWRCB: Water Rights
_____ Tahoe Regional Planning Agency
_____ Toxic Substances Control, Department of
_____ Water Resources, Department of

_____ Other _____
_____ Other _____

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

Starting Date October 9, 2020 Ending Date November 9, 2020

Lead Agency (Complete if applicable):

Consulting Firm: _____
Address: _____
City/State/Zip: _____
Contact: _____
Phone: _____

Applicant: AT&T Mobility
Address: 5001 Executive Parkway
City/State/Zip: San Ramon, CA 94583
Phone: (916) 834-0834

Signature of Lead Agency Representative: _____ **Date:** 10/8/2020

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

ENVIRONMENTAL INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

Use Permit 19-0012
AT&T Mobility

October 8, 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 19-0012 (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:
Lio Salazar, Senior Planner (530) 225-5532

4. Project Location:
The project is located in the community of Johnson Park at 38389 State Highway 299 East, Burney, CA. (Assessor Parcel Number 030-140-014)

5. Applicant Name and Address:
AT&T Mobility
5001 Executive Parkway
San Ramon, CA 94583

6. General Plan Designation:
Commercial (C) and Interim Residential (I-R)

7. Zoning:
Community Commercial-Design Review (C-2-DR) & Suburban Residential (SR)

8. Description of Project:
The project is a use permit application to construct, operate, and maintain a wireless telecommunication facility within a 30-foot by 40-foot lease area. The lease area would be surfaced with gravel and surrounded by a six-foot tall screen fence topped with a three-strand barbed wire anti-climb barrier and a 12-foot wide access gate. Proposed improvements consist of a 110-foot-tall monopine tower with a single tri-sector antenna mount outfitted with 3 panel antennas per sector, two microwave dishes, and ancillary equipment; an 8-foot by 8-foot pre-fabricated concrete equipment shelter; a 30-kilowatt diesel generator mounted on a 5-foot by 10-foot concrete slab with a level 2 sound enclosure and integrated 190-gallon fuel tank; and an ancillary equipment pedestal. Landscaping would consist of 5-gallon holly bushes planted 15 feet on center within an 8-foot wide landscaping easement surrounding the lease area. The proposal also includes the improvement of an approximately 350-foot gravel access road within a 15-foot access and utility easement (approximately 310 feet of the access road would be constructed over an existing dirt driveway); an approximately 360-foot underground utility run from an existing power pole and transformer; and an approximately 760-foot fiber-optic cable run from an existing telecommunications point of connection. Construction would consist of site preparation activities, including clearing, grubbing, and grading, including the removal of an 18-inch diameter pine tree and 6-inch diameter oak tree; trenching, excavation and backfilling for installation of all facility structures, ancillary equipment, fencing, utilities (electricity and fiber optic), and landscaping; application of a gravel surface over the access road and within the lease area; and re-application of paving over a portion of the gas station paved parking area that would have to be saw cut to excavate the trench for the fiber-optic run.

9. Surrounding Land Uses and Setting:
The project site is an approximately 50.5-acre property located in the community of Johnson Park at 38389 State

Highway 299 East, Burney, CA. An approximately 1.25-acre area near the southwest corner of the property is occupied by an existing gas station with diesel service, convenience market, and storage building. The 30-foot by 40-foot project lease area proposed is located on an undeveloped area of the property approximately 60-feet northeast of the area occupied by the gas station, convenience market, and storage building. The lease area is immediately adjacent to and west of a 100-foot wide Pacific Gas & Electric (PG&E) powerline easement that runs north to south through the project site.

The property is in the Pit River watershed and Burney Creek sub-watershed. The portion of the property west of the PG&E powerline easement is approximately 3,200 feet above mean sea level (A.M.S.L). The portion of the property that lies eastward ranges upward from 3,200 feet A.M.S.L to 3,300 feet A.M.S.L. The terrain west of the powerline easement is generally flat with a slight aspect that faces generally to the northwest toward State Highway 299 East. The project site drains to State Highway 299 East roadside drainage facilities. Three vegetation communities were observed within the project site, including the Ponderosa Pine-Incense Cedar Forest and Woodland Alliance; Brome Grass Herbaceous Semi-Natural Alliance; and ruderal disturbed vegetation.

The project site is situated near the northern extent of the Johnson Park rural community center. Surrounding land uses consist primarily of undeveloped vacant land zoned and/or designated low density residential development, moderate density suburban development, timberland, and public uses. Properties south of the project site are located within the Johnson Park rural community center commercial corridor and are zoned and/or designated for commercial and suburban residential use. Many of these properties are developed with commercial and residential uses, including higher density single family residences and mobile home parks.

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

Federal Communications Commission
California Central Valley Regional Water Quality Control Board

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 Pit River 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. Certified mail records indicate that the notification letter was received by the Pit River Tribe on Monday, August 3, 2020. As of Thursday, September 3, 2020, no request for consultation on the project was received from the Pit River Tribe. Therefore, the requirements of AB52 have been met and no AB52 project consultation with the Pit River Tribe is required.

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 Lio Salazar, Senior Planner at (530) 225-5532.

Lio Salazar, AICP
Senior Planner

10/08/2020
Date

Paul A. Hellman
Director of Resource Management

10/8/20
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, the following findings can be made:

a) The proposed tower is a 110-foot tall monopole structure. Photo simulations of the proposed structure (prepared by AdvanceSim) were provided from four public vantage points: first from State Highway 299 East approximately 500 feet southwest of the lease area looking northeast; second from State Highway 299 East approximately 400 feet north of the lease area looking south; third from the end of Presidents Way approximately 920 feet north of the lease area looking to the south; and fourth from State Highway 299 East approximately 1,200 feet northeast of the lease area looking southwest. The visual character of the proposed monopine is generally consistent with the visual character of the existing viewshed which is characterized by mixed conifer forest interspersed with light-industrial, commercial, and residential development, and utility infrastructure. The proposed wireless telecommunication facility and monopine structure would be set back approximately 150 feet from State Highway 299 East. Due to the proposed monopine design and existing tree canopy, the proposed wireless facility would not have a substantial adverse effect on a scenic vista. Therefore, potential impacts of the project on a scenic vista would be less-than-significant.

b) The project would not substantially damage any scenic resource. The project site is not visible from a designated scenic highway.

c) Shasta County Zoning Plan Section 17.88.282.D establishes standards that are protective of 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 telecommunication facilities to be placed within one thousand five hundred feet 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 proposed monopole would not be located within 1,500 feet of an existing wireless telecommunication facility. As proposed, the monopine tower complies with the minimum setback requirements and the ground structures and equipment would be screened by fencing and landscaping around the perimeter of the lease area. Due to the proposed monopine design of the tower, existing tree canopy, and general standards for wireless telecommunication facilities in the Shasta County Zoning Plan, the proposed wireless facility would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, potential impacts of the project on the existing visual character or quality of public views of the site and its surroundings would be less-than-significant.

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 applicant proposes two shielded and down-directed LED security lights, one at the front and one at the back of the concrete walk-in cabinet. The conditions of approval for the project would include a standard condition requiring compliance with Section 17.88.282.D.5 of the County Zoning Plan, requiring external structure and area lighting to be activated and controlled by motion sensors. No other lighting is proposed. Therefore, potential impacts of the project from new sources of substantial light or glare on day or nighttime views in a non-urbanized area would be less-than-significant.

Mitigation/Monitoring: None proposed.

II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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 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 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 may not qualify as forest land as defined in as defined in Public Resources Code section 12220(g) because the C-2 zone district does not allow for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. It the event that the California Department of Forestry and Fire Protection determines that the project site is forest land and the project would as a consequence result in the conversion of forest land, the project may qualify for a less-than-3 acre conversion permit exemption or would otherwise represent a negligible conversion of forest land currently present within Shasta County. Therefore, potential impacts of the project resulting from the loss forest land or conversion to non-forest use would be less-than-significant.

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. The proposed 30kW would be subject to this rule if its engine exceeds a 50-brake horsepower (bhp) engine rating.

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-d) The facility would not be located in an area where substantial numbers of people live or work. The nearest sensitive receptors would be residences located on an adjacent property to the southeast and a property across the highway to the southwest. These residences would be approximately 650 to 775 feet away from the facility, respectively. Trenching and backfilling for the electric utility and fiber optic cable would occur within approximately 200 to 425 feet away from these residences, respectively.

Substantial pollutant and odor 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 30-kilowatt diesel generator would be used only in the event of power failure to ensure continued operations. As a result, exposure of sensitive receptors or a substantial number of people to substantial pollutant concentrations and/or other emissions would be less-than-significant.

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 of 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 Resource Assessment prepared by Geist Engineering and Environmental Group, Inc., the following findings can be made:

a) Project related construction activities include the removal of an 18-inch diameter pine tree and 6-inch diameter oak tree and ground disturbing grading and trenching. A records search conducted as part of the Biological Resources Assessment (BRA) determined that 41 listed plant species and species of concern have potential to occur onsite or in the general project area. On the same basis, it was determined that potential habitat for 8 special-status bird and mammal species is present on-site, including potential habitat for osprey (*Pandion haliaetus*), northern goshawk (*Accipiter gentilis*), purple martin (*Pronge subis*), northern spotted owl (*Strix occidentalis caurina*), Townsend's big-eared bat (*Corynorhinus townsendii)*, fisher (*Pekania pennani*), american badger (*Taxidea taxus*), and California Wolverine (*Gulo gulo)*; and that potential habitat for 10 special status plant species is also present on-site, including potential habitat for Susanville milk-vetch (*Lavinia symmetricus mitrulus),* Lassen paintbrush (*Castilleja lassenensis*), Tracy's eriastrum (*Eriastrum tracyi*), Slender cottongrass (*Eriophorum gracile*), Wooly meadowfoam (*Limanthes floccosa ssp. floccosa*), Marsh skullcap (*Scutellaria galericulata*), Long-stiped campion (*Silene occidentalis ssp. longistpitata*), English Peak greenbriar (*Smilax jamesii*), Silvery false lupine (*Thermopsis californica var. argentata*), and Giant checkerbloom (*Sidalcea Gigantea*). Biological and botanical surveys of the project site and buffer area, including floristic surveys within the blooming period for all 10 special status plant species with potential to occur, were conducted on April 10 and June 2, 2020. No 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 the U.S. Fish and Wildlife Service have been identified on the project site or in the project area.

While no special status species were observed during reconnaissance level and specific floristic surveys conducted at the project site, due to the presence of potential habitat within the project site for those species described above several measures are proposed to mitigate potential significant impacts on these species during construction to a less-than significant level. Due to the small scope

of the proposed project, long-term operational and cumulative impacts to these species through habitat modification, either on site or within the region, is considered less-than significant. In addition, the applicant has proposed the incorporation of several general best management practices (BMPs) for staging areas, fueling, and general construction that are protective of wildlife terrestrial and aquatic wild habitat or species. These BMPs will be incorporated in the recommended use permit conditions of approval for the project.

The proposed measures to minimize potentially significant impacts on certain species identified in the BRA, including special status plant species, fishers, American badger, Thompson's big-eared bat, and nesting and special status avian species are described in the Mitigation/Monitoring section below. 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. In addition, no 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 the U.S. Fish and Wildlife Service have been identified on the project site or in the project area.

b) The BRA indicated that based on field observations, published information, and literature review, 3 vegetation communities and wildlife habitats are present within the project site, including the *Pinus ponderosa* – Calocedrus decurrens Forest and Woodland Alliance, *Avena* spp. – *Bromus* spp. Herbaceous Semi – Natural Alliance, and Ruderal-disturbed. None of these are considered a sensitive natural community. There is no riparian habitat on the project site or immediate vicinity.

c) A delineation of wetlands and watercourses was conducted within the project site on April 10, 2020. The BRA states the no wetland habitat was identified on the project site or in the immediate vicinity. Nonetheless, the applicant has proposed the incorporation of general best management practices (BMPs) for construction that are protective of water quality and aquatic wild habitat or species. These BMPs will be incorporated in the recommended conditions of approval for the project.

d) The project would not interfere with any native resident or migratory fish or wildlife species, nor impede the use of native wildlife nursery sites (see also section a) above.

e) The project would not conflict with any ordinances or policies which protect biological resources.

f) No habitat conservation plans or other similar plans have been adopted for the project site or project area.

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

IV.a.1) If construction of the project is not commenced prior to the 2021 blooming season and/or or halts prior to subsequent blooming seasons with construction to resume during or after said subsequent blooming seasons, the project proponent shall implement the following mitigation measures to avoid significant impacts to special status plant species:

A. Special-status plant surveys shall be conducted by a qualified botanist/biologist within the appropriate identification period to determine whether special status species with potential to occur within the biological survey area, as determined in the Biological Resource Assessment prepared by Geist Engineering and Environmental Group, Inc. dated June 2020, are present. The surveys shall be carried out within the project disturbance area and 200-foot buffer area.

i. 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, County, and the California Department of Fish and Wildlife for their records.

ii. 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.

ii. 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) The project proponent shall implement the following mitigation measures to avoid significant impacts to fishers:

A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to initiation of the proposed project and ground disturbing activities to determine if potentially active or known active den sites are present. The survey shall extend 0.5 miles to the south of the proposed project site. If development does not commence within 14 days of the pre-construction surveys or subsequent surveys, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

If potential dens are found during pre-construction surveys or subsequent surveys, a qualified biologist shall flag these dens. No work activities will be allowed to take place within 0.5 miles of an active den until juvenile fishers have left the den.

IV.a.3) The project proponent shall implement the following mitigation measures to avoid significant impacts to American badgers:

A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to implementation of the proposed project and/or ground disturbing activities to determine if potentially active or known active den sites are present. If development does not commence within 14 days of the preconstruction surveys or subsequent surveys, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work.

B. If potential dens are found during pre-construction surveys or subsequent surveys, but no evidence of active use is observed, a qualified biologist shall excavate these dens by hand with a shovel to prevent badgers from re-using them during construction.

C. If the qualified biologist determines that potential dens may be active, the entrances of the dens shall be blocked with soil, sticks, and debris for three (3) to five (5) days to discourage the use of these dens prior to project disturbance activities. The den entrances shall be blocked to an incrementally greater degree over the three (3) to five (5)-day period. After the qualified biologist determines that badgers have stopped using active dens, the dens shall be hand excavated with a shovel to prevent re-use during construction.

IV.a.4) The project proponent shall implement the following mitigation measures to avoid significant impacts to Townsend's big-eared bat and other bat species:

A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to implementation of the proposed project to determine whether bat species and their roosting/maternity/hibernation sites are present. If development does not commence within 14 days of the pre-construction surveys or subsequent surveys, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. If a bat roosting/maternity/hibernation site is identified during these surveys or is suspected to be present, a buffer area will be established to avoid impacts on the burrow/maternity site, and subsequently the bat species. The following buffer zone will apply:

A 300-foot buffer shall be established for known or potential maternity roosting site. If maintenance of a 300-foot buffer is infeasible, the project proponent shall consult with Shasta County and the appropriate state (California Department of Fish and Wildlife) and Federal (U.S. Fish and Wildlife Service) regulatory agencies to work out a plan to avoid impacts to the species before work commences.

B. The two trees to be removed shall be clearly marked prior to conduct of the preconstruction survey. If these trees are determined to have roost structure and removal will occur during the bat maternity season, when young are non-volant (March 1 – Aug 31), or during the bat hibernacula (November 1 – March 1), when bats have limited ability to safely relocate roosts measures in addition to the buffer described above may be necessary and the project proponent shall consult with Shasta County and the appropriate state regulatory agencies (California Department of Fish and Wildlife) and Federal (U.S. Fish and Wildlife Service) to determine whether additional measures are warranted and, if so, to identify and implement such measures before work commences. Additional measures could include, but not be limited to providing replacement or alternate roost habitat, and/or humane evictions. In the event humane evictions are identified as a measure to be implemented, the humane evictions should be conducted during appropriate seasonal periods of bat activity, which may vary by year, location, or species and must be conducted by or under the supervision of a biologist with specific experience conducting exclusions. Humane exclusions could consist of a two-day tree removal process whereby the non-habitat trees and brush are removed along with certain tree limbs on the first day and the remainder of the tree on the second day or other methods as may be determined in consultation with the regulatory agencies.

IV.a.5) The project proponent shall implement the following mitigation measures to avoid significant impacts avoid impacts to nesting

birds and/or raptors protected under FGC sections 3503 and 3503.5:

A. Conduct vegetation removal and other ground-disturbance activities associated with construction from September 1 through January 31, when birds are not nesting; or

B. Conduct pre-construction surveys within the project disturbance area and 200-foot buffer area for nesting birds if vegetation removal or ground disturbing activities are to take place during the nesting season (February 1 through August 31). These surveys shall be conducted by a qualified biologist within two (2) weeks prior to vegetation removal or construction activities during the nesting season. If development does not commence within 14 days of the pre-construction surveys or subsequent surveys, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. If an active nest is located during the preconstruction surveys or subsequent surveys, a non-disturbance buffer shall be established around the nest by a qualified biologist in consultation with the California Department of Fish and Wildlife. No vegetation removal or construction activities shall occur within this non-disturbance buffer until the young have fledged, as determined through additional monitoring by the qualified biologist. The results of the pre-construction surveys shall be sent electronically to the California Department of Fish and Wildlife at R1CEQARedding@wildlife.ca.gov.

C. If a migratory avian or raptor species is observed and suspected to be nesting, a buffer area will be established to avoid impacts to the active nest site. Identified nests should be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed. If active nesting sites are found, the following exclusion buffers will be established, and no project activities will occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest or parental care for survival.

   i. Minimum no disturbance of 250 feet around active nest of non-listed bird species and 250-foot no disturbance buffer around migratory birds;

   ii. Minimum no disturbance of 500 feet around active nest of non-listed raptor species;

   iii. and 0.5-mile no disturbance buffer from listed species and fully protected species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

D. Once work commences, all nests should be continuously monitored to detect any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change should cease and the appropriate regulatory agencies (i.e. CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures.

E. A variance from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and is recommended that CDFW and USFWS be notified in advance of implementation of a no disturbance buffer variance.

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 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, and observations on the project site and in the vicinity, the following findings can be made:

a) Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and commented that the project area is moderately sensitive for cultural resources. No cultural resources have been recorded within a half mile and no historical resources were inadvertently discovered during the development of the existing convenience market and fuel station that currently occupies the property. Therefore, the project would not cause a substantial adverse change in the significance of an historical resource.

b) Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and commented that the project area is moderately sensitive for cultural resources. No prehistoric resources have been recorded within a half mile and no historical resources were inadvertently discovered during the development of the existing convenience market and fuel station that currently occupies the property. Therefore, the project would not cause a substantial adverse change in the significance of an historical resource.

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.

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, if, in the course of development, any archaeological, historical, or paleontological resources are uncovered, discovered or otherwise detected 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 County'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, ii, iii) Rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction;

According to the Alquist-Priolo Earthquake Fault Zoning Maps for Shasta County, the project site is located within 1/2-mile of an earthquake fault. Shasta County General Plan policy SG-A requires that a geologic study of potential fault rupture be prepared by a registered geologist and a site-specific seismic hazards evaluation, including ground motion criteria for the design of new structures proposed within the study area for development proposals that include critical structures. Wireless telecommunications towers are not specifically designated as a critical or high-risk facility in the Uniform Building Code, nor are they defined as such by the Shasta County zoning code. The wireless telecommunication facility would be constructed in accordance with the seismic standards and requirements of the UBC, including preparation of a soils report, if deemed necessary based on site specific soil condtisions. Therefore, the potential impacts due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, would be less-than-significant.

iv) Landslides.

The project is not located at the top or toe or in the vicinity of any significant topographic feature that may be susceptible to landslides.

b) The United States Department of Agriculture, Natural Resources Soil Conservation Service Web Soil Survey, identified the soils in the project site as Burney-Arkright complex 2 to 9 percent slopes. This soil type has hazard of erosion ranging from low to moderate. The project site is flat. A grading permit is required prior to any grading activities. The grading permit includes requirements for erosion and sediment control, including retention of topsoil. Therefore, potential impacts of the project on soil erosion or with respect to the loss of topsoil would be less-than-significant.

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 property is relatively flat. The project site is not located at the top or toe of any significant slope. Based on records of construction in the area, there is no evidence to support a conclusion that the project is on a geologic unit or soil that is unstable.

d) The United States Department of Agriculture, Natural Resources Soil Conservation Service Web Soil Survey, identified the soils in the project site as Burney-Arkright complex 2 to 9 percent slopes. This soil type has is moderately expansive. The uniform building code requires a geotechnical report for commercial structures. The geotechnical report would recommend appropriate construction methods and/materials to address the effect of expansive soils.

e) The project does not require the use of septic tanks or alternative wastewater disposal systems.

f) The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

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 (QPR) 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 emissions are significantly less than the quantitative non-zero project-specific thresholds described above. The proposed 30-kilowatt diesel 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. HAZARDS AND HAZARDOUS MATERIALS: 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 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, the following findings can be made:

a) The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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 monopine 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. Therefore, potential impacts of the project from RF energy would be less-than-significant.

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 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 would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest schools are in the Town of Burney located approximately three miles away.

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 a "Very High" fire hazard severity zone. All improvements will be required to be constructed in accordance with 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. <u>HYDROLOGY AND WATER QUALITY</u>: 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?				✔

X. **HYDROLOGY AND WATER QUALITY:** Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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. Therefore, potential impacts of the project from violation of water quality standards, waste discharge, or other potential causes of water degradation would be less-than-significant.

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. The proposed project features a 30-foot by 40-foot equipment compound and lease area that would be and developed on relatively flat ground that would not require any significant recontouring and would be graveled throughout. The project would also include grading and trenching to construct an approximately 350-foot gravel access road within a 15-foot access and utility easement (approximately 310 feet of the access road would be constructed over an existing dirt driveway), an approximately 360-foot underground utility run from an existing power pole and transformer, and an approximately 760-foot fiber optic cable run from an existing telecommunications point of connection. The driveway would also be constructed on flat ground and not require any significant recontouring or drainage facilities that would significantly alter the existing drainage pattern or concentrate and direct storm water run-off that would significantly increase potential erosion or siltation on or off-site. New impervious surfaces would include the monopine and foundation for, backup generator pad, a meter pedestal and concrete stoop for the equipment shelter. Drainage from impervious surfaces, the graveled equipment compound and lease area, and the graveled driveway will be dispersed to adjacent unimproved areas and landscape areas adjacent to the equipment compound and lease area. Compliance with all provisions of the grading permit would be required.

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, the following findings can be made:

a) The project would not physically divide an established community. The project is not located in any 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 C General Plan land use designation, the C-2-DR zone district of the portion of the project site within which it is proposed, and is also consistent with Chapter 17.88.282 of the Shasta County Code, "Wireless Telecommunication Facilities."

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. Therefore, 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 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. Therefore, 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.

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, 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 Leq for daytime (7:00 a.m. to 10:00 p.m.) hours and 50dB hourly Leq for nighttime (10:00 p.m. to 7:00 a.m.) hours. The proposed backup generator would be enclosed with a Level 2 acoustical enclosure which would attenuate sound to 62.8dBA at a distance of 23 feet from the generator. The generator would operate intermittently either during a power outage or as part of its maintenance cycle. The sound intensity in decibels (dB) during operation would drop to 45 dB at the nearest property line located approximately 180 feet from the proposed location of the generator. Thus, the Shasta County General Plan noise level performance standards for non-transportation sources at all property lines would not be exceeded. There would also be increased noise levels during the construction phase of the project. However, due to the short duration of construction, the temporary increase in ambient noise levels in the vicinity of the project 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 and other ancillary structures 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 would not induce substantial unplanned population growth in the area, either directly or indirectly. The project does not include the development of new homes or businesses, nor would any new jobs be created as a result of the project. The project would include the development of an access driveway and extensions of utilities solely to serve the proposed wireless telecommunication facility. There would be no extension of other infrastructure. 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 barbed wire. 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 resultant development from the project will be required to pay the amount allowable per square foot of construction to mitigate school impacts.

Parks:

The County does not have a neighborhood parks system.

Other public facilities:

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) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			✔	
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 299 East. 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) Vehicle miles traveled within the County would temporarily increase during construction. The temporary increase would be attributable to employee and inspector travel and deliveries of materials and equipment. This temporary increase is not anticipated to be substantial due to the limited scope and duration of construction. The wireless communications facility would be unmanned and require only infrequent maintenance visits. Vehicle miles traveled in support of facility operations would be negligible. Therefore, potential impacts of the project attributable to conflicts or inconsistencies with CEQA Guidelines section 15064.3, subdivision (b) would be less-than-significant.

c) The project would not substantially increase hazards due to a geometric design feature or incompatible uses. The proposed graveling of an existing dirt path for a new 20-foot wide access road does not have geometric design features that would lead to an increase in hazards. There are no land uses occurring on the property that would be considered incompatible with a wireless telecommunications facility.

d) The project site is accessed from State Highway 299 East. The project has been reviewed by the Burney Fire Protection District who did not raise any concerns regarding inadequate emergency access. The project would not result in inadequate 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) Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and commented that the project area is moderately sensitive for cultural resources. No prehistoric resources have been recorded within a half mile and no historical resources were inadvertently discovered during the development of the existing convenience market and fuel station that currently occupies the property.

In accordance PRC §21080.3.1 the Department of Resource Management sent a certified letter to notify the Pit River 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. Certified mail records indicate that the notification letter was received by the Pit River Tribe on Monday, August 3, 2020. As of Thursday, September 3, 2020, no request for consultation on the project was received from the Pit River Tribe.

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.

Although there is no evidence to suggest that the project would result in any significant effect to tribal cultural resources, there is always the possibility that such resources or remains could be encountered. Therefore, if, in the course of development, any archaeological, historical, or paleontological resources are uncovered, discovered or otherwise detected 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.

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				✓

XIX. UTILITIES AND SERVICE SYSTEMS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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 adequate capacity to serve the projects projected demand in addition to the providers 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 underground conduit and telecommunications. 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 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				✓

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
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:

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.

XIX. 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 IV. Biological Resources, there is evidence to support a finding that the project would 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, or substantially 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 IV. Biological Resources the potential impacts

would be less-than-significant.

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

c) Based on the discussion and findings in all Section VII 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. With the incorporation of mitigation measures into the project specified in Section VII. Geology and Soils the potential impacts would be less-than-significant.

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

INITIAL STUDY COMMENTS

PROJECT NUMBER Use Permit 19-0012 – 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 Negative Declaration. These studies are available for review through the Shasta County Planning Division.

1. Photo Simulations, AdvanceSim, November 2019
2. Radio Frequency Emissions Compliance Report, Waterford Consultants, January 23, 2020
3. Noise Compliance Report, Waterford Consultants, January 16, 2020
4. Biological Resources Assessment, prepared by Geist Engineering and Environmental Group, Inc., June 2020

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 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. California Regional Water Quality Control Board
2. California Department of Fish and Wildlife

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

1. None

MITIGATION MONITORING PROGRAM (MMP)
FOR USE PERMIT 19-0012 (AT&T Mobility)

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
<u>IV. Biological Resources</u> IV.a.1) If construction of the project is not commenced prior to the 2021 blooming season and/or or halts prior to subsequent blooming seasons with construction to resume during or after said subsequent blooming seasons, the project proponent shall implement the following mitigation measures to avoid significant impacts to special status plant species: A. Special-status plant surveys shall be conducted by a qualified botanist/biologist within the appropriate identification period to determine whether special status species with potential to occur within the biological survey area, as determined in the Biological Resource Assessment prepared by Geist Engineering and Environmental Group, Inc. dated June 2020, are present The surveys shall be carried out within the project disturbance area and 200-foot buffer area. i. 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, County, and the California Department of Fish and Wildlife for their records. ii. 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. ii. 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.	Prior to issuance of a building permit. Prior to commencement of activity at the site. Prior to final building inspection.	Planning Division	

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
IV.a.2) The project proponent shall implement the following mitigation measures to avoid significant impacts to fishers: A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to initiation of the proposed project and ground disturbing activities to determine if potentially active or known active den sites are present. The survey shall extend 0.5 miles to the south of the proposed project site. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. If potential dens are found during the pre-construction survey or subsequent surveys, a qualified biologist shall flag these dens. No work activities will be allowed to take place within 0.5 miles of an active den until juvenile fishers have left the den.	Prior to issuance of a building permit. Prior to commencement of activity at the site.	Planning Division	
IV.a.3) The project proponent shall implement the following mitigation measures to avoid significant impacts to American badgers: A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to implementation of the proposed project and/or ground disturbing activities to determine if potentially active or known active den sites are present. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. B. If potential dens are found during the pre-construction survey or subsequent surveys, but no evidence of active use is observed, a qualified biologist shall excavate these dens by hand with a shovel to prevent badgers from re-using them during construction. C. If the qualified biologist determines that potential dens found during the pre-construction survey or subsequent surveys may be active, the entrances of the dens shall be blocked with soil, sticks, and debris for three (3) to five (5) days to discourage the use of these dens prior to project disturbance activities. The den entrances shall be blocked to an incrementally greater degree over the three (3) to five (5)-day period. After the qualified biologist determines that badgers have stopped using active dens, the dens shall be hand excavated with a shovel to prevent re-use during construction.	Prior to issuance of a building permit. Prior to commencement of activity at the site.	Planning Division	
IV.a.4) The project proponent shall implement the following mitigation			

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
measures to avoid significant impacts to Townsend's big-eared bat and other bat species: A. A pre-construction survey within the project disturbance area and 200-foot buffer area shall be conducted within two (2) weeks prior to implementation of the proposed project to determine whether bat species and their roosting/maternity/hibernation sites are present. If development does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. If a bat roosting/maternity/hibernation site is identified during the pre-construction survey or subsequent surveys, or is suspected to be present, a buffer area will be established to avoid impacts on the burrow/maternity site, and subsequently the bat species. The following buffer zone will apply: A 300-foot buffer feet shall be established for a known or potential maternity roosting site. If maintenance of a 300-foot buffer is infeasible, the project proponent shall consult with Shasta County and the appropriate state (California Department of Fish and Wildlife) and Federal (U.S. Fish and Wildlife Service) regulatory agencies to work out a plan to avoid impacts to the species before work commences. B. The two trees to be removed shall be clearly marked prior to conduct of the preconstruction survey. If these trees are determined to have roost structure and removal will occur during the bat maternity season, when young are non-volant (March 1 – Aug 31), or during the bat hibernacula (November 1 – March 1), when bats have limited ability to safely relocate roosts, measures in addition to the buffer described above may be necessary and the project proponent shall consult with Shasta County and the appropriate state regulatory agencies (California Department of Fish and Wildlife) and Federal (U.S. Fish and Wildlife Service) to determine whether additional measures are warranted and, if so, to identify and implement such measures before work commences. Additional measures could include, but not be limited to providing replacement or alternate roost habitat, and/or humane evictions. In the event humane evictions are identified as a measure to be implemented, the humane evictions should be conducted during appropriate seasonal periods of bat activity, which may vary by year, location, or species and must be conducted by or under the supervision of a biologist with specific experience conducting exclusions. Humane exclusions could consist of a two-day tree removal process whereby the non-habitat trees and brush are removed along with certain tree limbs on the first day and the remainder of the tree on the second day or other methods as may be determined in consultation with the regulatory agencies.	Prior to issuance of a building permit. Prior to commencement of activity at the site. Through completion of construction.	Planning Division	
IV.a.5) The project proponent shall implement the following mitigation	Prior to issuance of a building permit.	Planning Division	

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
measures to avoid significant impacts avoid impacts to nesting birds and/or raptors protected under FGC sections 3503 and 3503.5: A. Conduct vegetation removal and other ground-disturbance activities associated with construction from September 1 through January 31, when birds are not nesting; or B. Conduct pre-construction surveys within the project disturbance area and 200-foot buffer area for nesting birds if vegetation removal or ground disturbing activities are to take place during the nesting season (February 1 through August 31). These surveys shall be conducted by a qualified biologist within two (2) weeks prior to vegetation removal or construction activities during the nesting season. If development does not commence within 14 days of the pre-construction surveys or subsequent surveys, or halts for more than 14 days, then an additional survey is required prior to starting or resuming work. If an active nest is located during the preconstruction surveys or subsequent surveys, a non-disturbance buffer shall be established around the nest by a qualified biologist in consultation with the California Department of Fish and Wildlife. No vegetation removal or construction activities shall occur within this non-disturbance buffer until the young have fledged, as determined through additional monitoring by the qualified biologist. The results of the pre-construction surveys shall be sent electronically to the California Department of Fish and Wildlife at R1CEQARedding@wildlife.ca.gov.. C. If a migratory avian or raptor species is observed and suspected to be nesting, a buffer area will be established to avoid impacts to the active nest site. Identified nests should be continuously surveyed for the first 24 hours prior to any construction-related activities to establish a behavioral baseline. If no nesting avian species are found, project activities may proceed. If active nesting sites are found, the following exclusion buffers will be established, and no project activities will occur within these buffer zones until young birds have fledged and are no longer reliant upon the nest or parental care for survival. i. Minimum no disturbance of 250 feet around active nest of non-listed bird species and 250 foot no disturbance buffer around migratory birds; ii. Minimum no disturbance of 500 feet around active nest of non-listed raptor species; iii. and 0.5-mile no disturbance buffer from listed species and fully protected species until breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. D. Once work commences, all nests should be continuously monitored to detect	Prior to commencement of activity at the site. Through completion of construction.		

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
any behavioral changes as a result of project activities. If behavioral changes are observed, the work causing that change should cease and the appropriate regulatory agencies (i.e. CDFW, USFWS, etc.) shall be consulted for additional avoidance and minimization measures. E. A variance from these no disturbance buffers may be implemented when there is compelling biological or ecological reason to do so, such as when the project area would be concealed from a nest site by topography. Any variance from these buffers is advised to be supported by a qualified wildlife biologist and is recommended that CDFW and USFWS be notified in advance of implementation of a no disturbance buffer variance.			