

**COUNTY OF SACRAMENTO**  
**OFFICE OF PLANNING AND ENVIRONMENTAL REVIEW**  
**INITIAL STUDY**

**PROJECT INFORMATION**

---

**CONTROL NUMBER:** PLNP2019-00230

**NAME:** Gonzales Farms AT&T Cell Tower

**LOCATION:** 14111 Joy Drive, Galt, CA 95632

**ASSESSOR'S PARCEL NUMBER:** 150-0371-010-0000

**OWNER:** Jose Gonzales

**APPLICANT:** AT&T Mobility  
5000 Executive Parkway  
San Ramon, CA 94583  
Contact: Bradley Head

**PROJECT DESCRIPTION**

---

The project consists of a Use Permit to allow a 55-foot wireless telecommunication facility equipped with 12 antennas. The tower has been designed to resemble a water tower with antennas housed internally. Ground level ancillary equipment (30KW generator, HVAC system, DC power trunk, power plants, racks, equipment boxes, etc.) will be located upon two concrete foundations totaling approximately 140 square feet. All equipment will be enclosed within a fenced area of approximately 1,750 square feet. The project also consists of a Design Review to comply with Countywide Design Guidelines.

**ENVIRONMENTAL SETTING**

---

The project site is located on a 5.35-acre parcel within the unincorporated area of Galt. The parcel is bordered by a suburban community of single-family homes to the south, two 2.5-acre parcels to the east, and a 9.89-acre parcel with a large church to the north (reference Plate IS-1).

Improvements on-site include a single-family residence, swimming pool, and multiple agricultural accessory structures, with nearly all the improvements in the southern half of the property. The proposed telecommunication facility would be located at the northeast corner of the large pole barn (reference Plate IS-2).

Plate IS-1: Vicinity Map

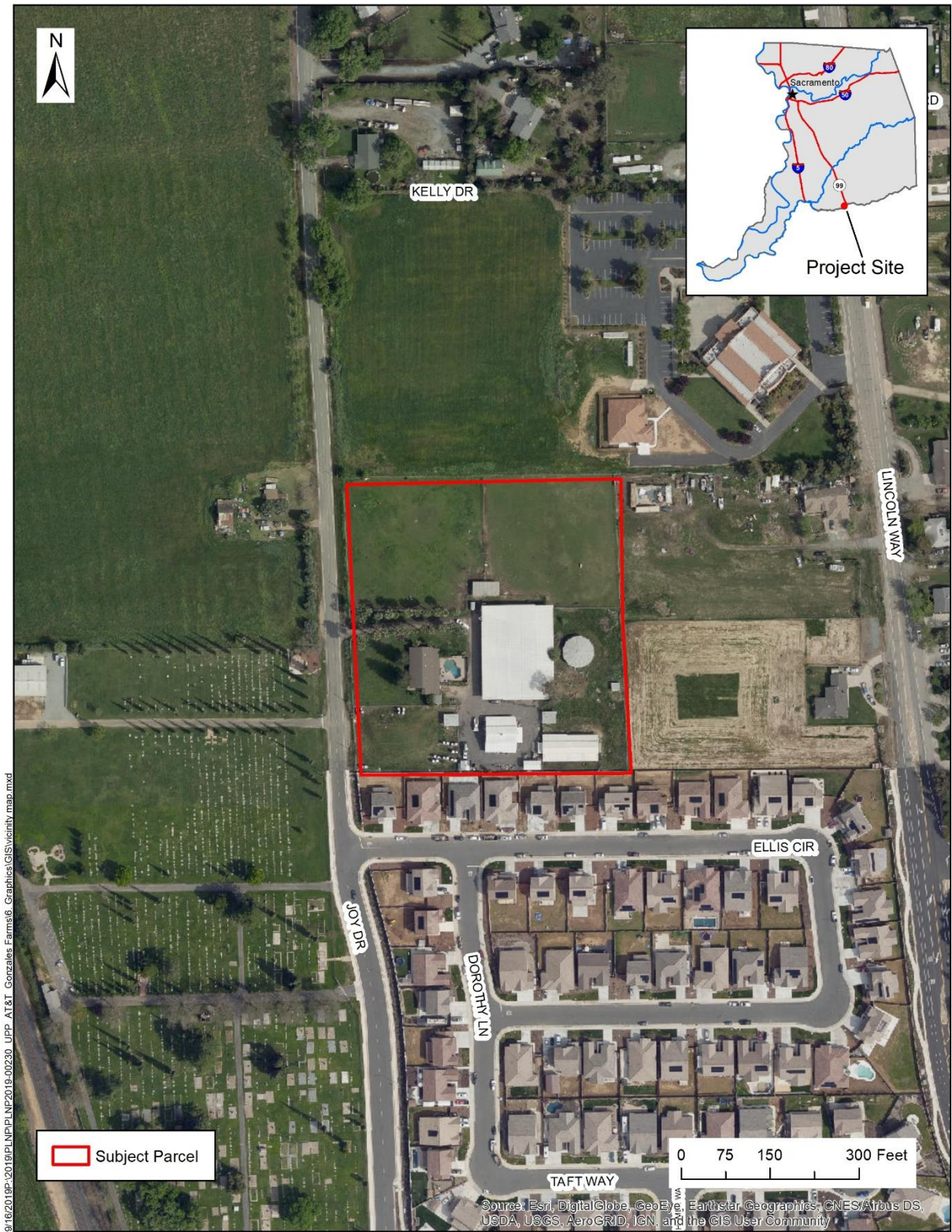
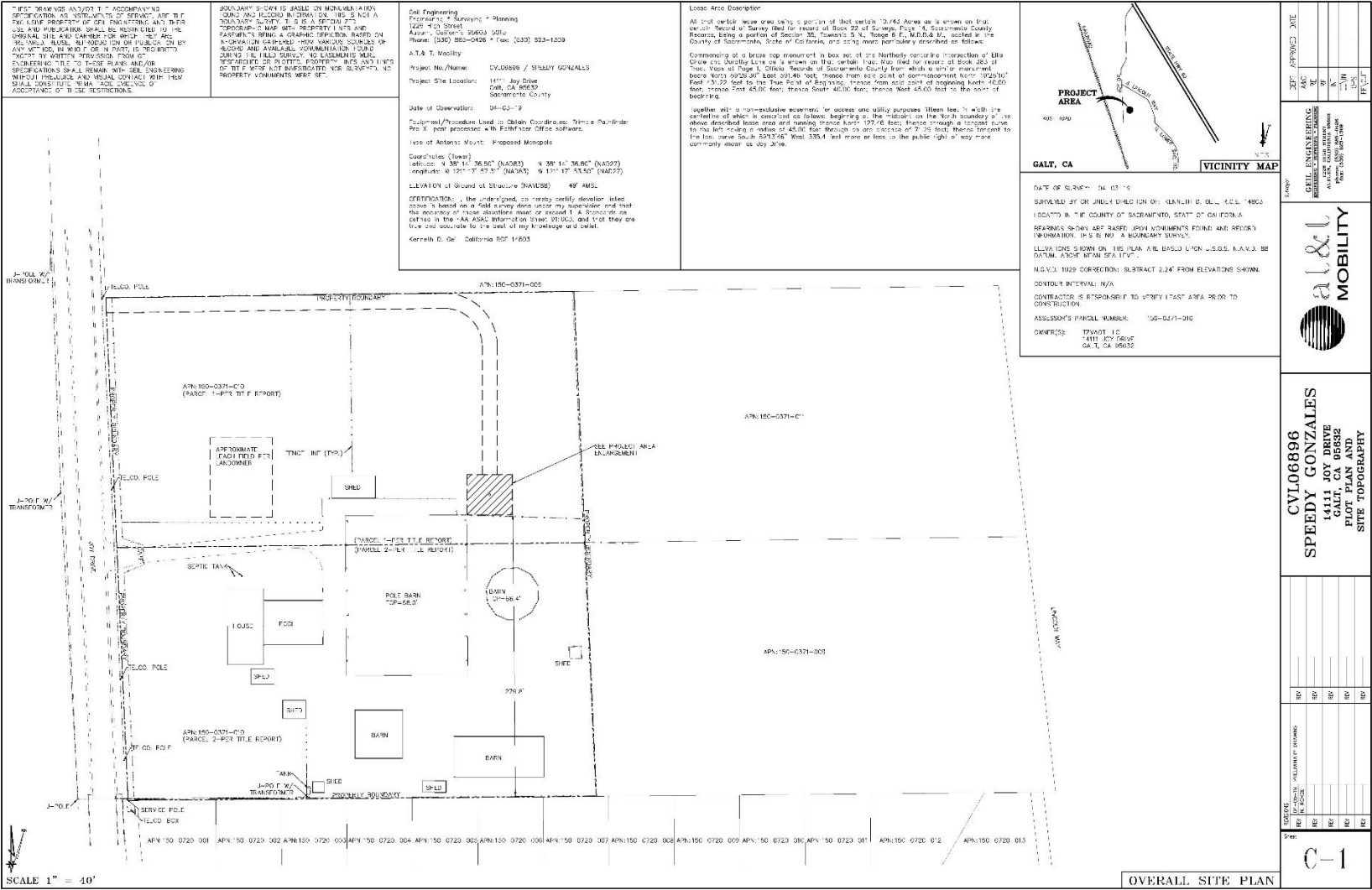


Plate IS-2: Site Plan



## ENVIRONMENTAL EFFECTS

---

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

### LAND USE

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

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to a general plan, specific plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, or;
- Physically disrupt or divide an established community.

Pursuant to Sacramento County Zoning Code (SZC) Section 3.6.7.A, wireless communication facilities are permitted in any zone, subject to the terms of a Conditional Use Permit issued by the appropriate authority. The SZC contains specific provisions for wireless facilities depending upon whether the facility is mounted on a building façade, on a building roof, collocated on an existing wireless facility, a tower fixed to the ground, or on a tower on a non-building structure or publicly owned facility (e.g. light poles). The proposed wireless facility is a new monopole, designed to be fixed to the ground, which falls within the Group I zoning district designation and is, therefore, regulated with the following SZC Sections:

**Section 3.6.7.A, Wireless Communication Facility.** Wireless communication facilities may be permitted in any zoning district, subject to the minimum standards and criteria of this Section. For the purposes of this use standard, zoning district designations are organized into the following: Group I: RD, AR, O, C-O, RM-2, DW, RR, and SPA zoning districts (unless otherwise specified in the particular SPA ordinance); Group II: BP, LC, and GC zoning districts; Group III: M-1, M-2, MP, AG, IR, and UR zoning districts.

#### 4. New Monopoles

##### a. Appropriate Authority

- (i) Any wireless facilities on new monopoles, including ancillary equipment buildings that are to be located in Group I zoning districts or do not meet the development standards of this Section are subject to the issuance of a Conditional Use Permit by the

Planning Commission pursuant to Section 6.4.3, "Conditional Use Permits, and that meet the development standards in Section 3.6.7.A.4.c, the Planning Commission may also impose conditions pursuant to Section 3.6.7.A.4.e.

(iii) All applications shall be referred to the Planning Director for a recommendation based upon the criteria listed in this use standard.

c. Development Standards for antenna(s) affixed to towers located on the ground in Group I zoning districts:

(i) The facility shall be separated from any adjacent interior property boundary or public right-of-way by 25 feet or public right-of-way by 25 feet or more. For rights-of-way with public utilities public facilities easements, the facility shall be separated from any adjacent interior property boundary by 25 feet or public right-of-way by 29 feet or more.

(ii) The height of any tower shall not exceed 55 feet in a Group I zoning district.

(iii) Deviations from setback and height requirements for towers in the Group I zoning districts may be permitted in conjunction with a Conditional Use Permit hearing if the final hearing body finds at least of the following criteria can be met.

(1) The tower will be located adjacent to a nonresidential use.

(2) The tower will be a co-location site, either with an existing or proposed tower.

(3) The size, shape, topography, or existing development of the site would restrict the installation of a wireless facility in compliance with the standards of this Section.

Additional Zoning Code requirements regarding installation of wireless facilities are found in Section 3.6.7.A (4)(e)01-13.5(f), which states the following:

e. Wireless facilities should be integrated into existing structures or co-located with existing wireless facilities to reduce the visual and potential visual intrusion of such facilities on the surrounding area, residents, and general populace of this County; and therefore:

(i) Utility providers are therefore encouraged to:

(1) Employ all reasonable measures to site their antenna equipment on existing structures as facade mounts, roof mounts, or collocation on existing towers prior to applying for new towers.

(2) Whenever possible avoid locating towers on sites that require painting or lighting per Federal Aviation Administration Standards.

(3) All County agencies, dependent and independent districts, and utility providers shall be encouraged to permit and streamline collocation of cellular facilities on appropriate existing structures subject to reasonable engineering requirements.

(ii) In order to achieve these objectives and to protect the purposes of the Code, the following conditions shall be considered by the appropriate authority:

(1) The use of screening, stealthing, use of setbacks, and use of architectural features on the subject site.

(2) The use of mono-pines and mono-palms should be used only when it fits in with existing vegetation. Any use of tree features shall be maintained.

(3) The use of close proximity designs when new antennas are placed on poles.

(4) The use of materials that blend the tower or wireless facility in with the skyline, prevalent architectural or natural features of the subject site.

(5) All unused or obsolete wireless facilities, towers or equipment shall be removed from their respective sites within six (6) months after operation has ceased.

(6) Identification signs, including emergency phone numbers of the utility provider, shall be posted at all tower and equipment sites.

(7) In addition to the requirements listed in this Section, wireless communication facilities are subject to all other applicable regulations and permits, including those of the Public Utilities Commission of the State of California and the Federal Communication Commission.

### **DISCUSSION OF PROJECT IMPACTS**

The proposed tower will have a height of 55 feet and is separated from any adjacent interior property boundary or public right-of-way by more than 25 feet and therefore meets SZC standards. The proposed tower height is equivalent to the 55-foot standard for Group I zoning districts.



## **CONCLUSION**

The proposed project will not significantly alter current land uses or create a use that is incompatible with current designations; nor will it divide an established community or conflict with any policy adopted for the protection of the environment. Potential land use related impacts are considered ***less than significant***.

## **AESTHETICS**

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

- Substantially degrade the existing visual character or quality of the site and its surroundings, or;
- Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.

It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals.

## **DISCUSSION OF PROJECT IMPACTS**

The wireless facility has been designed to resemble a water tower, with the antennas housed within the tank. The facility will slightly alter the aesthetic of the area; however, the water tank would not appear out of place within the rural agricultural setting. Plate IS-3, Plate IS-4, Plate IS-5, and Plate IS-6 show the existing views along with proposed photo-simulations of the proposed water tank design.

Safety lighting on and around the facilities would introduce new sources of light.

## **CONCLUSION**

Aesthetic impacts are subjective and may be perceived differently by various affected individuals. Given the rural agricultural setting and the water tank design, the project would not substantially degrade the visual character or quality of the project site or vicinity.

The project has the potential to create new sources of light or glare associated with safety lighting; however, it would be innocuous given the scale of the facilities and limited generation of light and glare associated with cell towers.

Impacts related to aesthetics are ***less than significant***.

Plate IS-3: View from Joy Drive (looking southeast)





Plate IS-4: View from Ellis Circle (looking northwest)



Plate IS-5: View from Dorothy Lane (looking northeast)





Plate IS-6: View from South Lincoln Way (looking southwest)



## HYDROLOGY AND WATER QUALITY

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

- Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality

### **CONSTRUCTION WATER QUALITY: EROSION AND GRADING**

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

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

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

In addition to complying with the County's ordinances and requirements, construction sites disturbing one or more acres are required to comply with the State's General Stormwater Permit for Construction Activities (CGP). CGP coverage is issued by the State Water Resources Control Board (State Board) [http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/construction.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml) and enforced by the Regional Water Board. Coverage is obtained by submitting a Notice of Intent (NOI) to the State Board prior to construction and verified by receiving a WDID#. The CGP requires preparation and implementation of a site-specific

Stormwater Pollution Prevention Plan (SWPPP) that must be kept on site at all times for review by the State inspector.

Applicable projects applying for a County grading permit must show proof that a WDID # has been obtained and must submit a copy of the SWPPP. Although the County has no enforcement authority related to the CGP, the County does have the authority to ensure sediment/pollutants are not discharged and is required by its Municipal Stormwater Permit to verify that SWPPPs include the minimum components.

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

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

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

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

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

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



**OPERATION: STORMWATER RUNOFF**

Development and urbanization can increase pollutant loads, temperature, volume and discharge velocity of runoff over the predevelopment condition. The increased volume, increased velocity, and discharge duration of stormwater runoff from developed areas has the potential to greatly accelerate downstream erosion and impair stream habitat in natural drainage systems. Studies have demonstrated a direct correlation between the degree of imperviousness of an area and the degradation of its receiving waters. These impacts must be mitigated by requiring appropriate runoff reduction and pollution prevention controls to minimize runoff and keep runoff clean for the life of the project.

The County requires that projects include source and/or treatment control measures on selected new development and redevelopment projects. Source control BMPs are intended to keep pollutants from contacting site runoff. Examples include “No Dumping-Drains to Creek/River” stencils/stamps on storm drain inlets to educate the public, and providing roofs over areas likely to contain pollutants, so that rainfall does not contact the pollutants. Treatment control measures are intended to remove pollutants that have already been mobilized in runoff. Examples include vegetated swales and water quality detention basins. These facilities slow water down and allow sediments and pollutants to settle out prior to discharge to receiving waters. Additionally, vegetated facilities provide filtration and pollutant uptake/adsorption. The project proponent should consider the use of “low impact development” techniques to reduce the amount of imperviousness on the site, since this will reduce the volume of runoff and therefore will reduce the size/cost of stormwater quality treatment required. Examples of low impact development techniques include pervious pavement and bioretention facilities.

The County requires developers to utilize the *Stormwater Quality Design Manual for the Sacramento Region, 2018* (Design Manual) in selecting and designing post-construction facilities to treat runoff from the project. Regardless of project type or size, developers are required to implement the minimum source control measures (Chapter 4 of the Design Manual). Low impact development measures and Treatment Control Measures are required of all projects exceeding the impervious surface threshold defined in Table 3-2 and 3-3 of the Design Manual. Further, depending on project size and location, hydromodification control measures may be required (Chapter 5 of the Design Manual).

Updates and background on the County’s requirements for post-construction stormwater quality treatment controls, along with several downloadable publications, can be found at the following websites:

<http://www.waterresources.saccounty.net/stormwater/Pages/default.aspx>

<http://www.beriverfriendly.net/Newdevelopment/>

The final selection and design of post-construction stormwater quality control measures is subject to the approval of the County Department of Water Resources; therefore, they should be contacted as early as possible in the design process for guidance. Project compliance with requirements outlined above will ensure that project-related stormwater pollution impacts are ***less than significant***.

## **PUBLIC SAFETY**

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

### ***MICROWAVE EMISSIONS***

Three of the major types of personal wireless communication services currently in use are described below (information from the Federal Communications Commission (FCC) website at: [http://wireless.fcc.gov/services/index.htm?job=wtb\\_services\\_home](http://wireless.fcc.gov/services/index.htm?job=wtb_services_home)).

### ***CELLULAR TELEPHONE SERVICE***

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

### ***PERSONAL COMMUNICATIONS SERVICES (PCS)***

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

### ***WIRELESS COMMUNICATIONS SERVICE (WCS)***

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

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

### ***ELECTROMAGNETIC FIELDS (EMFs) AND SAFETY STANDARDS***

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

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

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

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

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

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

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

The 1996 FCC limits for maximum permissible exposure specifies two tiers of exposure criteria, one tier for “controlled environments” (usually involving occupational environments) and a second, more stringent tier for “uncontrolled environments” (usually involving the general public). The FCC limits set the allowable specific absorption rate (SAR) level from *localized* exposure (e.g., hand-held devices) at 1.6 watts per kilogram (W/kg) for the general public (uncontrolled environments), as averaged over 1 gram of tissue. The FCC recommended exposure limits for generalized exposure are summarized in Table 1 of Bulletin 56, which includes maximum power density levels for RF energy originating from communication sites (as well as other sources). The levels are determined based on continuous exposure, are dependent on the frequency which is transmitted from the site, and are usually expressed in milliwatts per square centimeter (mW/cm<sup>2</sup>).

Generally, personal wireless services such as cellular, PCS, and WCS transmit in a frequency range of 300 – 3000 MHz (megahertz). Power density limits for uncontrolled environments (i.e., general public) from transmitters in this range are calculated by dividing the frequency by 1500 (f/1500). Therefore, a facility transmitting at a frequency of 870 MHz would have a maximum recommended power density of 0.58 mW/cm<sup>2</sup>. At frequencies of 1500 – 100,000 MHz the maximum power density is set at 1.0 mW/cm<sup>2</sup>.

### **REGULATORY BACKGROUND**

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

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

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

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

### **DISCUSSION OF PROJECT IMPACTS**

There are no known significant biological effects associated with cellular facilities when they are operated at or below FCC-adopted standards. The project site will be leased to a specific carrier (AT&T) which is proposing a 55-foot monopole that will accommodate 12 antennas. The applicant provided a RF-EME (Radio Frequency- Electromagnetic Energy) Emissions Compliance Report prepared by Waterford Consultants, LLC, which included an engineering statement confirming compliance with radiofrequency radiation exposure limits.

The technical report concluded that for a person anywhere at ground, the maximum RF exposure level due to the proposed operation is calculated to be 0.54% of the applicable public exposure limit. The maximum calculated level at the nearest adjacent building's rooftop is 1.86% of the public exposure limit.

### **CONCLUSION**

No significant environmental impacts related to EMF emissions are expected as a result of this project; impacts are ***less than significant***.

### ***TOWER FAILURE***

Due to standards for construction and distance from other structures, any impact related to potential tower failure is anticipated to be less than significant.



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

Accredited by the American National Standards Institute (ANSI), a Standard entitled "Structural Standards for Antenna Supporting Structures and Antennas" has been established for the design, superstructure, and foundation of telecommunication towers. This standard is designated as ANSI/TIA-222, provisions F and G, and is the governing document for telecommunication towers in the United States. The development of the standard was sponsored by the *Telecommunication* Industry Association (TIA) subcommittee TR-14.7. The key aspects discussed in the document are modernization of the design of new towers and existing towers, definition of wind and ice load, and applicable requirements in the case of seismic activity.

### **DISCUSSION**

The "fall drop zone" (radius of tower failure) for the proposed project is estimated to be within a 55± foot radius of the tower center. The area that would be affected by potential tower collapse would be the underlying ancillary equipment or an open grass field. No residential structures occur within the potential fall zone of the tower. The tower is an engineer-designed structure that will comply with the safety factors specified in the Uniform Building Code, monopole failure is considered extremely unlikely.

### **CONCLUSION**

Potential impacts as a result of tower collapse are therefore considered ***less than significant***.

### **BIOLOGICAL RESOURCES**

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

- Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- Have a substantial adverse effect on riparian habitat or other sensitive natural communities.
- Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies.

An evaluation of natural and biological resources was conducted to determine whether any special status plant, wildlife species or their habitat, or other sensitive habitats occur in or near the project site. The United States Fish and Wildlife Service's (USFWS) Information for Planning and Conservation was used to obtain a list of special status and endangered species that had the potential to exist in the study areas. The parcel is located within the Galt, Lodi North, Clay, & Lockeford USGS 7.5-minute Quadrangle Maps. The California Natural Diversity Database (CNDDDB) occurrence records and the California Department of Fish and Wildlife's (CDFW) Biogeographic Information and Observation System website were then used to review critical habitat, range, and distribution data.

Based on examination of natural resources and the presence of sensitive habitats in proximity to the project site, it was determined that several special status species, their habitat, and overall sensitivity of the surrounding area warranted further analysis and discussion. Special status species with the potential to occur in or near the project area are discussed below.

### **SPECIAL STATUS SPECIES**

The United States Congress passed the Federal Endangered Species Act (FESA) in 1973 to protect those species that are endangered or threatened with extinction. In 1984, the State of California enacted a similar law, the California Endangered Species Act (CESA), to protect species identified and listed by the California Fish and Game Commission as endangered or threatened with extinction.

CESA and FESA are intended to operate in conjunction with CEQA and the National Environmental Policy Act (NEPA) to help protect ecosystems that endangered and threatened species depend upon. USFWS is responsible for implementation of the FESA while the CDFW implements the CESA.

Accidental or intentional killing of a threatened or endangered species is labeled "take." "Take" is defined by the FESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect" any threatened or endangered wildlife species. Take may include significant habitat modification or degradation and is applied to threatened or endangered plant species as well.

Take, incidental to an otherwise lawful activity, may be authorized by one of two procedures. If a federal agency is involved with the permitting, funding, or carrying out of the project, then initiation of formal consultation between that agency and USFWS pursuant to Section 7 of the FESA is required if a proposed project may affect a federally listed species. Such consultation would result in a biological opinion that addresses the anticipated effects of the project to listed species and may authorize a limited level of incidental take. If a federal agency is not involved with the project, and federally listed species may be taken as part of the project, then an incidental take permit pursuant to Section 10(a) of the FESA must be obtained. USFWS may issue such a permit upon completion of a satisfactory conservation plan for any listed species that would be affected by the project.

Under CEQA, species of animals or plants presumed to be endangered, rare, or threatened as listed in the California Code of Regulation or Federal Code of Regulation;

those officially proposed for listing (federal classification), candidate species (federal and state classification), and species of special concern (State of California classification) are given similar treatment as protected animal species. Plants identified as 1A, 1B, and 2A, 2B by the California Native Plant Society are also treated similarly under CEQA.

### **SPECIAL-STATUS PLANTS**

Table IS-1 provides a list of the special-status plant species that have been documented in the CNDDDB search (Galt, Lodi North, Clay, & Lockeford) and describes their regulatory status, habitat, and potential for occurrence on the project site.

**Table IS-1: Special-Status Plant Species & Potential for Occurrence**

Species	Status <sup>1</sup>			Habitat and Blooming Period	Potential for Occurrence <sup>2</sup>
	USFWS	CDFW	CRPR		
Dwarf downingia <i>Downingia pusilla</i>	–	–	2B.2	Typically occurs in vernal pools or other shallow, fresh water conditions (CNDDDB 2019); 0 to 1,460 feet elevation. Blooms March-May.	Not expected to occur. Suitable habitat for this species is not present on the project site. Nearest occurrence is located over 8 miles to the east.
Legenere <i>Legenere limosa</i>	–	–	1B.1	Relatively deep and wet vernal pools (Witham 2006:39); below 3,000 feet elevation. Blooms April–June.	Not expected to occur. Suitable habitat not present on site. Known occurrences are located within 5 miles of the project site.
Sanford's arrowhead <i>Sagittaria sanfordii</i>	–	–	1B.2	Shallow freshwater marshes and swamps; below 2,200 feet elevation. Blooms May–October.	Not expected to occur. The project site does not provide potential habitat. Nearest known occurrence six miles northwest of project site.
Succulent owl's clover <i>Castilleja campestris</i> ssp. <i>succulenta</i>	T	E	1B.2	Vernal pools and swales; 165 to 2,460 feet elevation. Blooms April – May.	Not expected to occur. The project site is well below the expected elevation range for this species and suitable habitat not present on site. Nearest occurrence nearly 4 miles to the southeast of the site.

Notes: USFWS = U.S. Fish and Wildlife Service; CDFW = California Department of Fish and Wildlife; CRPR = California Rare Plant Rank; CNDDDB = California Natural Diversity Database; ESA = Federal Endangered Species Act; CESA = California Endangered Species Act

#### <sup>1</sup> Legal Status Definitions

U.S. Fish and Wildlife Service:

E Endangered (legally protected)

T Threatened (legally protected)

California Department of Fish and Game:

E Endangered (legally protected)

California Rare Plant Ranks:

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

2 Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA)

CRPR Extensions:

.1 Seriously endangered in California (>80% of occurrences are threatened and/or high degree and immediacy of threat)

.2 Fairly endangered in California (20 to 80% of occurrences are threatened)

#### <sup>2</sup> Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or species not detected by surveys during blooming period.

Could occur: Suitable habitat is available on the project site; however, there are little to no other indicators that the species might be present.

Sources: USFWS 2019, CDFW 2019, CNDDDB 2019, CNPS 2019

No special-status plant species are expected to occur on the project site.

### **SPECIAL-STATUS WILDLIFE**

Table IS-2 provides a list of the special-status wildlife species that have been documented within the CNDDB search area (Galt, Lodi North, Clay, & Lockeford) and USFWS IPaC results for Sacramento County and Northern San Joaquin County. The table describes their regulatory status, habitat, and potential for occurrence on the project site.

**Table IS-2: Special-Status Wildlife and Potential for Occurrence**

Species	Listing Status <sup>1</sup>		Habitat	Potential for Occurrence <sup>2</sup>
	Federal	State		
Invertebrates				
Valley elderberry longhorn beetle <i>Desmocerus californicus dimorphus</i>	T	–	Elderberry shrubs below 3,000 feet in elevation, typically in riparian habitats. Found in stems measuring 1 inch or greater at ground level.	Not expected to occur. The project site does not contain elderberry shrubs, which are the sole hosts for this species.
Vernal pool fairy shrimp <i>Branchinecta lynchi</i>	T	–	Vernal pools and other seasonal wetlands in valley and foothill grasslands. Tends to occur in smaller wetland features (less than 0.05 acre in size) (USFWS 1994).	Not expected to occur. The project site does not contain vernal pools or other seasonal wetlands. Nearest known occurrence located approximately 2.25 miles north of the project site.
Vernal pool tadpole shrimp <i>Lepidurus packardii</i>	E	–	Vernal pools and other seasonal wetlands in valley and foothill grasslands that pond for sufficient duration to allow the species to complete its life cycle. Typically found in ponds ranging from 0.1 to 80 acres in size (USFWS 1994).	Not expected to occur. The project site does not contain vernal pools or other seasonal wetlands. Nearest known occurrence located approximately 1.8 miles north of the project site.
Amphibians and Reptiles				
California red-legged frog <i>Rana draytonii</i>	T	SC	Inhabits ponds, slow-moving creeks, and streams with deep pools that are lined with dense emergent marsh or shrubby riparian vegetation. Submerged root masses and undercut banks are important habitat features for this species.	Not expected to occur. No breeding habitat for this species is present on the project site The site is surrounded by suburban development and the species is considered extirpated from the Sacramento Valley floor.
California tiger salamander <i>Ambystoma californiense</i>	T	T	Vernal pools and seasonal wetlands with a minimum 10-week inundation period and surrounding uplands, primarily grasslands, with burrows and other belowground refugia (e.g., rock or soil crevices).	Not expected to occur. No suitable habitat occurs on or immediately adjacent to the project site.
Giant garter snake <i>Thamnophis gigas</i>	T	T	Slow-moving streams, sloughs, ponds, marshes, inundated floodplains, rice fields, and irrigation/drainage ditches on the Central Valley floor with mud bottoms, earthen banks, emergent vegetation, abundant small aquatic prey and absence or low numbers of large predatory fish. Also require upland refugia not subject to flooding during the snake's inactive season.	Not expected to occur. No suitable habitat occurs on or immediately adjacent to the project site.

Species	Listing Status <sup>1</sup>		Habitat	Potential for Occurrence <sup>2</sup>
	Federal	State		
Western pond turtle <i>Emys marmorata</i>	–	SC	Forage in ponds, marshes, slow-moving streams, sloughs, and irrigation/drainage ditches; nest in nearby uplands with low, sparse vegetation.	Not expected to occur. The project site does not provide suitable aquatic or upland habitat for this species; no suitable habitat occurs on or immediately adjacent to the project site. The nearest occurrence is located 6 miles to the northwest.

**Birds**

Yellow-billed cuckoo <i>Coccyzus americanus</i>	T	E	Dense large tracts of riparian woodlands with well-developed understories. Also, utilizes orchards adjacent to streams in the Sacramento Valley.	Not expected to occur. The project site does not provide suitable habitat. Nearest riparian corridor occurs 0.3 miles to the south of the site.
Swainson's hawk <i>Buteo swainsoni</i>	–	T	Forages in grasslands and agricultural lands; nests in riparian and isolated trees.	Not expected to occur. Foraging habitat does not occur on-site. Similarly, nesting habitat not present- mostly palm trees on-site. A few smaller ornamental trees located immediately adjacent to the residence and pole barn. Project site located next to highly developed suburban community. There are 25+ known occurrences within 5 miles of the project site. Further discussion below.
Tricolored blackbird <i>Agelaius tricolor</i> (nesting colony)	–	SC	Forages in agricultural lands and grasslands; nests in marshes, riparian scrub, and other areas that support cattails or dense thickets of shrubs or herbs. Requires open water and protected nesting substrate, such as flooded, spiny, or thorny vegetation (Schuford and Gardali 2008: 439).	Not expected to occur. The site does not contain suitable habitat. The nearest occurrence is located 2 miles to the north.

**Mammals**

Riparian brush rabbit <i>Sylvilagus bachmani riparius</i>	E	E	Forages on herbaceous vegetation close to brushy cover, along trails and firebreaks near riparian habitat. They seldom venture more than several yards from brushy cover, and do not forage in large open areas (Larson 1993). Brushy clumps smaller than 400 square yards are rarely occupied (Basey 1990).	Not expected to occur. The site does not contain suitable habitat. Nearest riparian habitat is located approximately 0.3 miles south.
--	---	---	--	---

Note: CNDDDB = California Natural Diversity Database; USFWS = U.S. Fish and Wildlife Service

<sup>1</sup> Legal Status Definitions

Federal:	State:
E Endangered (legally protected)	D Delisted
T Threatened (legally protected)	FP Fully protected (legally protected)
D Delisted	SC Species of special concern (no formal protection other than CEQA consideration)
	E Endangered (legally protected)
	T Threatened (legally protected)

<sup>2</sup> Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present on the project site due to poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

Could occur: Suitable habitat is available on the project site; however, there are little to no other indicators that the species might be present.



Species	Listing Status <sup>1</sup>		Habitat	Potential for Occurrence <sup>2</sup>
	Federal	State		
Known to occur: The species, or evidence of its presence, was observed on the project site during project surveys, or was otherwise documented.				
Sources: USFWS 2019, CDFW 2019, CNDDDB 2019, CNPS 2019				

As indicated in Table IS-2, no special-status wildlife are expected to occur on the project site. The project site is located south of the city of Galt and is in a developing suburban area. Although, Swainson's hawk are not expected to occur, the number of past occurrences recorded in CNDDDB warrants additional discussion.

### **SWAINSON'S HAWK**

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

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

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

### **NESTING HABITAT IMPACT METHODOLOGY**

For determining impacts to and establishing mitigation for nesting Swainson's hawks in Sacramento County, CDFW recommends implementing the measures set forth in the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California (November 1, 1994). These state that no intensive new disturbances, such as heavy equipment operation associated with

construction, should be initiated within ¼-mile of an active Swainson's hawk nest in an urban setting or within ½-mile in a rural setting between March 1 and September 15.

### **DISCUSSION OF PROJECT IMPACTS**

The project site is located in the unincorporated area of the city of Galt, immediately north of a newly developed suburban neighborhood. The project site does not contain suitable nesting habitat for Swainson's hawk, as most of the trees on site are palms. The only other trees on site are small ornamental trees, which are located next to the residence and barns. It is unlikely that these trees would be used for nesting for the species, given the close proximity to actively used structures.

It is unlikely that the species would use trees located along Joy Drive as the road is utilized by residents in the surrounding suburban neighborhoods. Additionally, Union Pacific's railway is located 750 feet to the west of the project site. It is unlikely that Swainson's hawk would choose trees along or near the railway given the associated noise.

The nearest recorded occurrence within the CNDDDB database is located in San Joaquin County, along the Dry Creek channel, approximately 0.4 miles to the south. Since this occurrence a large subdivision of more than 100 homes has been constructed immediately north of Dry Creek. This subdivision would likely serve as an urban buffer between the project and riparian area to the south. The month to two-month timeframe associated with the construction of a cell tower would not be any more obtrusive to the species than the daily activities in the area. It is unlikely that trees along the busy rail and road corridors would be chosen over the preferable riparian forest to the south. There is no suitable habitat within a ¼-mile of the project site; no mitigation is required.

### **CONCLUSION**

No special-status plants or wildlife are expected to occur on the site. Potential impacts are *less than significant*.

### ***MIGRATORY NESTING BIRDS***

The Migratory Bird Treaty Act of 1918, which states "unless and except as permitted by regulations, it shall be unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, kill, attempt to take, capture, or kill" a migratory bird. Section 3(18) of FESA defines the term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Causing a bird to abandon an active nest may cause harm to egg(s) or chick(s) and is therefore considered "take." To avoid take of nesting migratory birds, minimization measures have been included to require that activities either occur outside of the nesting season, or to require that nests be buffered from construction activities until the nesting season is concluded.

### **DISCUSSION OF PROJECT IMPACTS**

The facility is to be constructed in an open field lacking tree canopy. Suitable tree habitat is present on the adjacent residential property line, less than 100 feet south of

the proposed facility location. Preconstruction surveys will be required if work is to commence between February 1 and August 31. The purpose of the survey requirement is to ensure that construction activities do not agitate or harm nesting migratory birds, potentially resulting in nest abandonment or other harm to nesting success.

### **CONCLUSION**

With the recommended mitigation measures, impacts to migratory birds will be ***less than significant***.

### **CULTURAL RESOURCES**

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

- Have a substantial adverse effect on an archaeological resource.
- Disturb any human remains, including those interred outside of formal cemeteries.
- Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074.

The California Environmental Quality Act (CEQA) defines cultural resources as historical and unique archaeological resources that meet significance criteria of the California Register of Historical Resources. The eligibility criteria of the California Register include the following:

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Has yielded, or may be likely to yield, information important in prehistory or history. (Public Resources Code SS5024.1, Title 14 CCR, Section 4852).

Under CEQA, lead agencies must consider the effects of their projects on cultural resources.

### ***AB-52 CONSULTATION***

Pursuant to Public Resources Code 21090.3.1(b)(1), tribal notifications were sent out to participating tribes on September 19, 2019. Correspondence sent to the tribes included a project description, non-confidential letter with from the California Historical Resources Information System's Northern Central Information Center indicating that the

project area is not sensitive with respect to cultural resources, and supporting map graphics. Written correspondence was received from the United Auburn Indian Community (UAIC) on October 16, 2019. The correspondence identified the project as potentially sensitive and requested consultation under AB-52. UAIC requested that a worker awareness training pamphlet, avoidance, inadvertent discovery, and post ground disturbance site visit mitigation language be incorporated. In the event that tribal cultural resources are discovered, UAIC's policy is that tribal monitors be present for all further ground-disturbing activities.

### **CONCLUSION**

With the recommended mitigation, potential impacts to cultural resources will be ***less than significant***.

## **ENVIRONMENTAL MITIGATION MEASURES**

---

### **MITIGATION MEASURE A: MIGRATORY BIRD NEST PROTECTION**

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

1. If construction activity (which includes clearing, grubbing, or grading) is to commence within 50 feet of nesting habitat between February 1 and August 31, a survey for active migratory bird nests shall be conducted no more than 14 day prior to construction by a qualified biologist.
2. Trees slated for removal shall be removed during the period of September through January, in order to avoid the nesting season. Any trees that are to be removed during the nesting season, which is February through August, shall be surveyed by a qualified biologist and will only be removed if no nesting migratory birds are found.
3. If active nest(s) are found in the survey area, a non-disturbance buffer, the size of which has been determined by a qualified biologist, shall be established and maintained around the nest to prevent nest failure. All construction activities shall be avoided within this buffer area until a qualified biologist determines that nestlings have fledged, or until September 1.

### **MITIGATION MEASURE B: CULTURAL RESOURCES AWARENESS TRAINING**

A consultant and construction worker tribal cultural resources awareness brochure and training program for all personnel involved in project implementation will be developed in coordination with interested Native American Tribes. The brochure will be distributed and the training will be conducted in coordination with qualified cultural resources specialists, Native American Representatives, and Monitors from culturally affiliated Native American Tribes before any stages of project implementation and construction activities begin on the project site. The program will include relevant information regarding sensitive tribal cultural resources, including applicable regulations, protocols

for avoidance, and consequences of violating state laws and regulations. The worker cultural resources awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the project site and will outline what to do and whom to contact if any potential archaeological resources or artifacts are encountered. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any find of significance to Native Americans and behaviors, consistent with Native American Tribal values.

### **MITIGATION MEASURE C: INADVERTENT DISCOVERIES**

If potential tribal cultural resources (TCRs), archaeological resources, other cultural resources, articulated, or disarticulated human remains are discovered during construction activities, work will cease within 100 feet of the find (based on the apparent distribution of cultural resources), whether or not a Native American Monitor from a traditionally and culturally affiliated Native American Tribe is present. The Office of Planning and Environmental Review shall be immediately notified at (916) 874-6141. A qualified cultural resources specialist and Native American Representatives and Monitors from traditionally and culturally affiliated Native American Tribes will assess the significance of the find and make recommendations for further evaluation and treatment as necessary. Culturally appropriate treatment may be, but is not limited to, processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, returning objects to a location within the project area where they will not be subject to future impacts. The Tribe does not consider curation of TCRs to be appropriate or respectful and request that materials not be permanently curated, unless requested by the Tribe.

Treatment that preserves or restores the cultural character and integrity of a Tribal Cultural Resource may include Tribal Monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. These recommendations will be documented in the project record. For any recommendations made by traditionally and culturally affiliated Native American Tribes that are not implemented, a justification for why the recommendation was not followed will be provided in the project record.

If adverse impacts to tribal cultural resources, unique archeology, or other cultural resources occurs, then consultation with UAIC, Wilton Rancheria, Lone Band of Miwoks, and other traditionally and culturally affiliated Native American Tribes regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 should occur, in order to coordinate for compensation for the impact by replacing or providing substitute resources or environments.

In addition, pursuant to Section 5097.97 of the State Public Resources Code and Section 7050.5 of the State Health and Safety Code, in the event of the discovery of human remains, all work is to stop and the County Coroner and Office of Planning and Environmental Review shall be immediately notified. If the remains are determined to



be Native American, guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains.

#### **MITIGATION MEASURE D: POST-GROUND DISTURBANCE SITE VISIT**

At a minimum of seven (7) days prior to beginning earthwork or other substantial soil disturbing activities, the applicant shall contact UAIC and provide them with the contractor's contact information and the proposed date of earthwork. A UAIC representative shall be invited to inspect the project site, including any soil piles, trenches, or other disturbed areas, within the first five days of groundbreaking activity, or as appropriate for the type and size of the project.

The contractor shall implement any measures deemed necessary by PER to be necessary and feasible to preserve in place, avoid, or minimize significant effects to the resources, including the use of a Native American monitor whenever work is occurring within 100 feet of a find(s).

#### **MITIGATION MEASURE COMPLIANCE**

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

1. The proponent shall comply with the MMRP for this project, including the payment of a fee to cover the Office of Planning and Environmental Review staff costs incurred during implementation of the MMRP. The MMRP fee for this project is **\$1,834.00**. This fee includes administrative costs of \$934.00.
2. Until the MMRP has been recorded and the administrative portion of the MMRP fee has been paid, no final parcel map or final subdivision map for the subject property shall be approved. Until the balance of the MMRP fee has been paid, no encroachment, grading, building, sewer connection, water connection or occupancy permit from Sacramento County shall be approved.

## INITIAL STUDY CHECKLIST

---

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

- 1 Potentially Significant indicates there is substantial evidence that an effect MAY be significant. If there are one or more "Potentially Significant" entries an Environmental Impact Report (EIR) is required. Further research of a potentially significant impact may reveal that the impact is actually less than significant or less than significant with mitigation.
- 2 Less than Significant with Mitigation applies where an impact could be significant but specific mitigation has been identified that reduces the impact to a less than significant level.
- 3 Less than Significant or No Impact indicates that either a project will have an impact but the impact is considered minor or that a project does not impact the particular resource.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
<b>1. LAND USE - Would the project:</b>					
a. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to a general plan, specific plan or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X		The project is consistent with environmental policies of the Sacramento County General Plan, Southeast Area Community Plan, Plan and Sacramento County Zoning Code.  Please refer to the Land Use section of the Initial Study for a further discussion of Zoning Code requirements.
b. Physically disrupt or divide an established community?				X	The project will not create physical barriers that substantially limit movement within or through the community.
<b>2. POPULATION/HOUSING - Would the project:</b>					
a. Induce substantial unplanned population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of infrastructure)?				X	The proposed infrastructure project is intended to service existing or planned development and will not induce substantial unplanned population growth.
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?				X	The project will not result in the removal of existing housing, and thus will not displace substantial amounts of existing housing.
<b>3. AGRICULTURAL RESOURCES - Would the project:</b>					
a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance or areas containing prime soils to uses not conducive to agricultural production?				X	The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the current Sacramento County Important Farmland Map published by the California Department of Conservation.
b. Conflict with any existing Williamson Act contract?				X	No Williamson Act contracts apply to the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
c. Introduce incompatible uses in the vicinity of existing agricultural uses?				X	Though in an area where agricultural uses occur, the project will not substantially interfere with agricultural operations because the project consists of the construction of a telecommunication facility to be located on a residential property.
<b>4. AESTHETICS - Would the project:</b>					
a. Substantially alter existing viewsheds such as scenic highways, corridors or vistas?				X	The project does not occur in the vicinity of any scenic highways, corridors, or vistas.
b. Substantially degrade the existing visual character or quality of the site and its surroundings?			X		Construction will not substantially degrade the visual character or quality of the project site. It is acknowledged that aesthetic impacts are subjective and may be perceived differently by various affected individuals. Nonetheless, given the urbanized environment in which the project is proposed, it is concluded that the project would not substantially degrade the visual character or quality of the project site or vicinity.
c. Create a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area?			X		The project will result in a new source of substantial light, glare, or shadow that would result in safety hazards or adversely affect day or nighttime views in the area.
<b>5. AIRPORTS - Would the project:</b>					
a. Result in a safety hazard for people residing or working in the vicinity of an airport/airstrip?				X	The project occurs outside of any identified public or private airport/airstrip safety zones.
b. Expose people residing or working in the project area to aircraft noise levels in excess of applicable standards?				X	The project occurs outside of any identified public or private airport/airstrip noise zones or contours.
c. Result in a substantial adverse effect upon the safe and efficient use of navigable airspace by aircraft?				X	The project does not affect navigable airspace.

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

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
h. Result in substantial adverse physical impacts associated with the provision of public school services?				X	The project will not require the use of public school services.
i. Result in substantial adverse physical impacts associated with the provision of park and recreation services?				X	The project will not require park and recreation services.
<b>7. TRANSPORTATION/TRAFFIC</b> - Would the project:					
a. Result in a substantial increase in vehicle trips that would exceed, either individually or cumulatively, a level of service standard established by the County?				X	The project will not increase vehicle trips.
b. Result in a substantial adverse impact to access and/or circulation?				X	No changes to existing access and/or circulation patterns would occur as a result of the project. The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
c. Result in a substantial adverse impact to public safety on area roadways?				X	No changes to existing access and/or circulation patterns would occur as a result of the project; therefore no impacts to public safety on area roadways will result. The project will be required to comply with applicable access and circulation requirements of the County Improvement Standards and the Uniform Fire Code. Upon compliance, impacts are less than significant.
d. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X	The project does not conflict with alternative transportation policies of the Sacramento County General Plan, with the Sacramento Regional Transit Master Plan, or other adopted policies, plans or programs supporting alternative transportation.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
<b>8. AIR QUALITY - Would the project:</b>					
a. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?			X		The project does not exceed the screening thresholds established by the Sacramento Metropolitan Air Quality Management District and will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment.
b. Expose sensitive receptors to pollutant concentrations in excess of standards?				X	There are no sensitive receptors (i.e., schools, nursing homes, hospitals, daycare centers, etc.) adjacent to the project site. See Response 8.a.
c. Create objectionable odors affecting a substantial number of people?				X	The project will not generate objectionable odors.
<b>9. NOISE - Would the project:</b>					
a. Result in exposure of persons to, or generation of, noise levels in excess of standards established by the local general plan, noise ordinance or applicable standards of other agencies?				X	The project consists of the construction of a telecommunication facility and will not result in exposure of persons to, or generation of, noise levels in excess of applicable standards.
b. Result in a substantial temporary increase in ambient noise levels in the project vicinity?			X		Project construction will result in a temporary increase in ambient noise levels in the project vicinity. This impact is less than significant due to the temporary nature of the these activities, limits on the duration of noise, and evening and nighttime restrictions imposed by the County Noise Ordinance (Chapter 6.68 of the County Code).
<b>10. HYDROLOGY AND WATER QUALITY - Would the project:</b>					
a. Substantially deplete groundwater supplies or substantially interfere with groundwater recharge?				X	The project will not rely on groundwater supplies and will not substantially interfere with groundwater recharge.



	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Substantially alter the existing drainage pattern of the project area and/or increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?				X	The project does not involve any modifications that would substantially alter the existing drainage pattern and or/increase the rate or amount of surface runoff in a manner that would lead to flooding.  Compliance with applicable requirements of the Sacramento County Floodplain Management Ordinance, Sacramento County Water Agency Code, and Sacramento County Improvement Standards will ensure that impacts are less than significant.
c. Develop within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map or within a local flood hazard area?				X	The project is not within a 100-year floodplain as mapped on a federal Flood Insurance Rate Map, nor is the project within a local flood hazard area.
d. Place structures that would impede or redirect flood flows within a 100-year floodplain?				X	The project site is not within a 100-year floodplain.
e. Develop in an area that is subject to 200 year urban levels of flood protection (ULOP)?				X	The project is not located in an area subject to 200-year urban levels of flood protection (ULOP).
f. Expose people or structures to a substantial risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X	The project will not expose people or structures to a substantial risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.
g. Create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems?				X	The project does not propose any physical changes that would affect runoff from the site.
h. Create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality?			X		Compliance with the Stormwater Ordinance and Land Grading and Erosion Control Ordinance (Chapters 15.12 and 14.44 of the County Code respectively) will ensure that the project will not create substantial sources of polluted runoff or otherwise substantially degrade ground or surface water quality.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
<b>11. GEOLOGY AND SOILS</b> - Would the project:					
a. Expose people or structures to substantial risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				X	Sacramento County is not within an Alquist-Priolo Earthquake Fault Zone. Although there are no known active earthquake faults in the project area, the site could be subject to some ground shaking from regional faults. The Uniform Building Code contains applicable construction regulations for earthquake safety that will ensure less than significant impacts.
b. Result in substantial soil erosion, siltation or loss of topsoil?				X	Compliance with the County's Land Grading and Erosion Control Ordinance will reduce the amount of construction site erosion and minimize water quality degradation by providing stabilization and protection of disturbed areas, and by controlling the runoff of sediment and other pollutants during the course of construction.
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, soil expansion, liquefaction or collapse?				X	The project is not located on an unstable geologic or soil unit.  Pursuant to Title 16 of the Sacramento County Code and the Uniform Building Code, a soils report will be required prior to building construction. If the soils report indicates that soils may be unstable for building construction then site-specific measures (e.g., special engineering design or soil replacement) must be incorporated to ensure that soil conditions will be satisfactory for the proposed construction.
d. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available?				X	The project consists of new telecommunication facilities and will not require wastewater disposal facilities.
e. Result in a substantial loss of an important mineral resource?				X	The project is not located within an Aggregate Resource Area as identified by the Sacramento County General Plan Land Use Diagram, nor are any important mineral resources known to be located on the project site.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
f. Directly or indirectly destroy a unique paleontological resource or site?				X	No known paleontological resources (e.g. fossil remains) or sites occur at the project location.
<b>12. BIOLOGICAL RESOURCES</b> - Would the project:					
a. Have a substantial adverse effect on any special status species, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community?			X		No special status species are known to exist on or utilize the project site, nor would the project substantially reduce wildlife habitat or species populations. Refer to the Biological Resources section of this document.
b. Have a substantial adverse effect on riparian habitat or other sensitive natural communities?			X		No sensitive natural communities occur on the project site, nor is the project expected to affect natural communities off-site. Refer to the Biological Resources section of this document.
c. Have a substantial adverse effect on streams, wetlands, or other surface waters that are protected by federal, state, or local regulations and policies?				X	No protected surface waters are located on or adjacent to the project site.
d. Have a substantial adverse effect on the movement of any native resident or migratory fish or wildlife species?					The project site is already developed. Project implementation would not affect native resident or migratory species.
e. Adversely affect or result in the removal of native or landmark trees?				X	No native and/or landmark trees occur on the project site, nor is it anticipated that any native and/or landmark trees would be affected by off-site improvement required as a result of the project.
f. Conflict with any local policies or ordinances protecting biological resources?				X	The project is consistent with local policies/ordinances protecting biological resources.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
g. Conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, state or federal plan for the conservation of habitat?				X	There are no known conflicts with any approved plan for the conservation of habitat.  The project is within the Urban Development Area of the South Sacramento Habitat Conservation Plan (SSHCP); however, the project will occur within an area with a "Disturbed" land cover type.
<b>13. CULTURAL RESOURCES</b> - Would the project:					
a. Cause a substantial adverse change in the significance of a historical resource?				X	No historical resources would be affected by the proposed project.  Historical resources have been identified on the project site. Refer to the Cultural Resources discussion in the Environmental Effects section above.
b. Have a substantial adverse effect on an archaeological resource?				X	No known archaeological resources occur on-site.  The Northern California Information Center was contacted regarding the proposed project. A record search indicated that the project site is not considered sensitive for archaeological resources.
c. Disturb any human remains, including those interred outside of formal cemeteries?			X		No known human remains exist on the project site. Nonetheless, mitigation has been recommended to ensure appropriate treatment should remains be uncovered during project implementation.
d. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X		Notification pursuant to Public Resources Code 21080.3.1(b) was provided to the tribes and request for consultation was received. Refer to the Cultural Resources discussion in the Environmental Effects section above.
<b>14. HAZARDS AND HAZARDOUS MATERIALS</b> - Would the project:					
a. Create a substantial hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.

	Potentially Significant	Less Than Significant with Mitigation	Less Than Significant	No Impact	Comments
b. Expose the public or the environment to a substantial hazard through reasonably foreseeable upset conditions involving the release of hazardous materials?				X	The project does not involve the transport, use, and/or disposal of hazardous material.
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				X	The project does not involve the use or handling of hazardous material.
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, resulting in a substantial hazard to the public or the environment?				X	The project is not located on a known hazardous materials site.
e. Impair implementation of or physically interfere with an adopted emergency response or emergency evacuation plan?				X	The project would not interfere with any known emergency response or evacuation plan.
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to or intermixed with urbanized areas?				X	The project is within the urbanized area of the unincorporated County. There is no significant risk of loss, injury, or death to people or structures associated with wildland fires.
<b>15. GREENHOUSE GAS EMISSIONS – Would the project:</b>					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		The project will not have the potential to interfere with the County meeting the goals of AB 32 (reducing greenhouse gas emissions to 1990 levels by 2020); therefore, the climate change impact of the project is considered less than significant.

**SUPPLEMENTAL INFORMATION**

---

LAND USE CONSISTENCY	Current Land Use Designation	Consistent	Not Consistent	Comments
General Plan	Low Density Residential	X		
Community Plan	N/A			Not in a Community Plan Land Use Area
Land Use Zone	AR-5 (Agricultural-Residential -- 5 acres)	X		

## **INITIAL STUDY PREPARERS**

---

Environmental Coordinator: Tim Hawkins

Section Manager: Joelle Inman

Project Leader: Kimber Gutierrez

Environmental Document Preparer: Josh Greetan

Initial Review: Josh Greetan

Office Manager: Belinda Wekesa-Batts

Administrative Support: Justin Maulitp