

# MONTEREY COUNTY

## RESOURCE MANAGEMENT AGENCY

### PLANNING

1441 SCHILLING PLACE 2<sup>nd</sup> FLOOR, SALINAS, CA 93901

PHONE: (831) 755-5025/FAX: (831) 757-9516



## *INITIAL STUDY*

### *BACKGROUND INFORMATION*

<b>Project Title:</b>	EATON ROBERT W (AT&T MOBILITY) WIRELESS COMMUNICATION FACILITY (WCF)
<b>File No.:</b>	PLN180362
<b>Project Location:</b>	37501 TASSAJARA RD CARMEL VALLEY
<b>Name of Property Owner:</b>	ROBERT EATON
<b>Name of Applicant:</b>	AT&T MOBILITY
<b>Assessor's Parcel Number(s):</b>	418-293-006-000
<b>Acreage of Property:</b>	41.2 acres
<b>General Plan Designation:</b>	RESOURCE CONSERVATION – MINIMUM ACREAGE 40
<b>Zoning District:</b>	RC/40-D
<b>Lead Agency:</b>	County of Monterey, Resource Management Agency – Planning
<b>Prepared By:</b>	Jaime Scott Guthrie, AICP, Associate Planner
<b>Date Prepared:</b>	August 6, 2020
<b>Contact Person:</b>	Jaime Scott Guthrie, AICP, Associate Planner
<b>Phone Number:</b>	831-796-6414

## ***II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING***

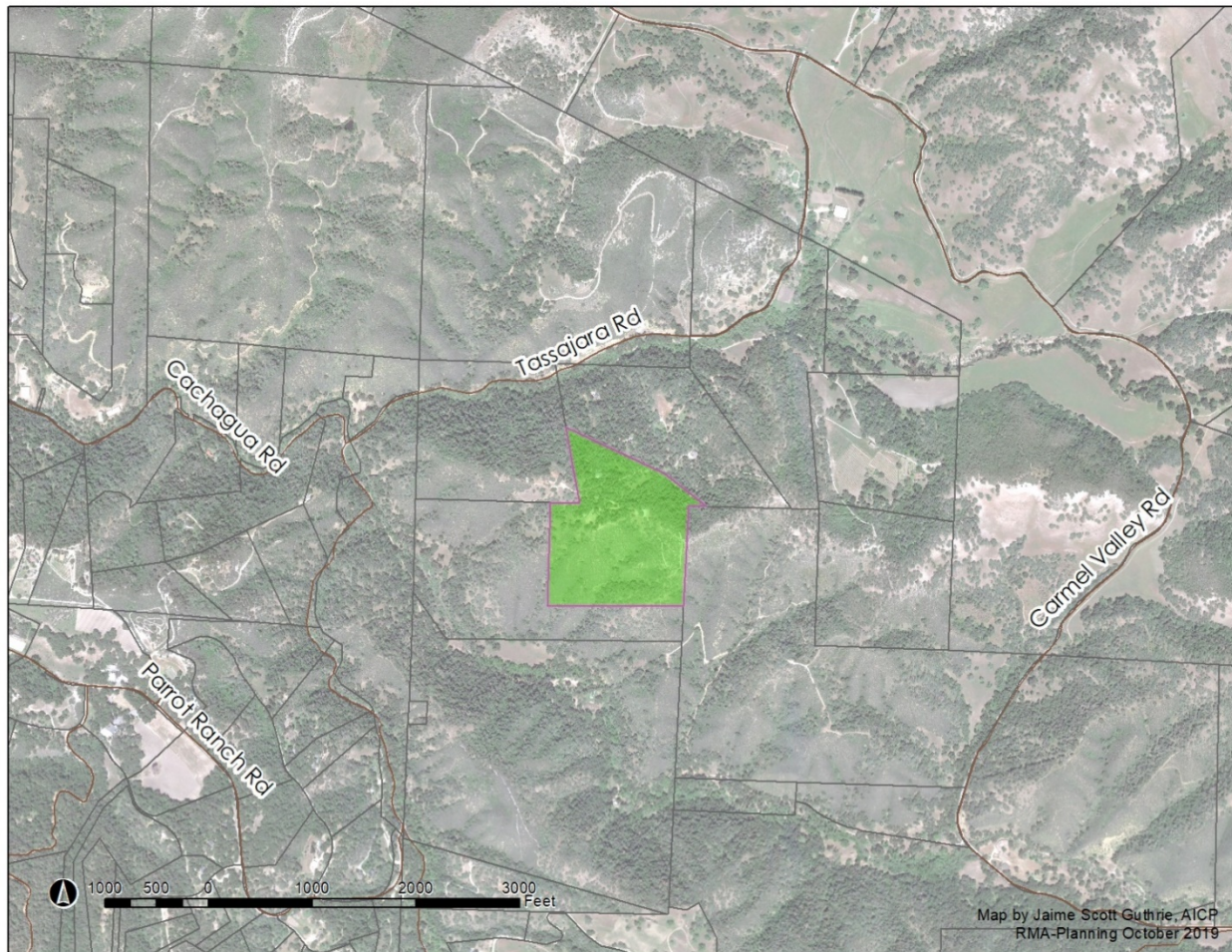
### **A. Description of Project:**

The purpose of the proposed project is for AT&T to construct a communication tower that would facilitate wireless cellular service to the Cachagua community. **(Figure 1)** The proposed unmanned wireless communication facility (WCF) **(Figure 2)** is intended to provide coverage to approximately 123 residential units as well as enhance the area's public safety infrastructure by facilitating wireless communication for the community's police, fire fighters, and other emergency personnel. The project application, proposes installation of a 60-foot monopole disguised as a pine tree (monopine), within a 527 square foot (sf) equipment enclosure. Equipment located on the monopine would be the following: twelve (12) panel antennas on antenna arrays, four surge suppressors, twenty-two remote radio units (RRU), and one microwave dish **(Figure 3)**. The proposed equipment enclosure will contain a walk-in cabinet, GPS unit, and diesel generator on a concrete slab. The walk-in cabinet will be connected to the monopine with a cable bridge. An existing power pole will be replaced for connection of overhead power line to a new pole adjacent to and outside of the west enclosure fence. No more than 20 cubic yards of grading is anticipated for implementation of the entire 527 sf facility **(Figure 4)**.

The original project proposal included a 100 foot tall monopole. The applicant has revised the project proposal in response to public comments during community meetings to include a 60 foot monopine. This Initial Study analyzes the 60 foot monopine proposal. See Section VI – Environmental Checklist of this Initial Study for discussion.

### **B. Surrounding Land Uses and Environmental Setting:**

The subject property is a 41-acre parcel located at 37501 Tassajara Road (Assessor's Parcel Number 418-293-006-000). Zoning on the property is Resource Conservation with a 40 acre minimum parcel size and Design Control overlay (RC/40-D) (see **Figures 1 and 2**). The project site is within the rural community of Cachagua situated south and east of Tassajara Road and west of East Carmel Valley Road. The location of the 527 square foot WCF lease area on the parcel is along the eastern boundary approximately 680 feet north of the southeast corner of the property **(Figure 2)**. The monopine and equipment enclosure would be atop a hill approximately 2,000 feet above mean sea level and surrounded by undeveloped steeply sloped lands with a few residences to the north. Structures nearest to the lease area are two water storage tanks approximately 10 feet north, a 1,400 sf storage building and a 130 sf metal storage container that are approximately 620 feet northwesterly. Access to the unmanned WCF location for periodic maintenance and repairs is from Tassajara Road via an existing dirt road that extends southeast from the eastern edge of the property line for approximately 1,250 feet past the existing storage structures and turns sharply northward for approximately 475 feet to the lease area. The vegetation is dominated by Coast live oak woodland habitat, and brush and grasses. (Source: 1, 3, 6, 7, & 9)



**Figure 1. Vicinity Map** – Location of 37501 Tassajara Road in Cachagua Area Plan of Monterey County. (Source: 1, 3, 6, 9, 10)

### **C. Project Approvals Required:**

The subject property is governed by policies and regulations contained in the 2010 Monterey County General Plan (General Plan), the Cachagua Area Plan (CAP), and the Monterey County Inland Zoning Ordinance (Title 21). Implementation of the project requires approval of a Use Permit to allow construction of a wireless communication facility.

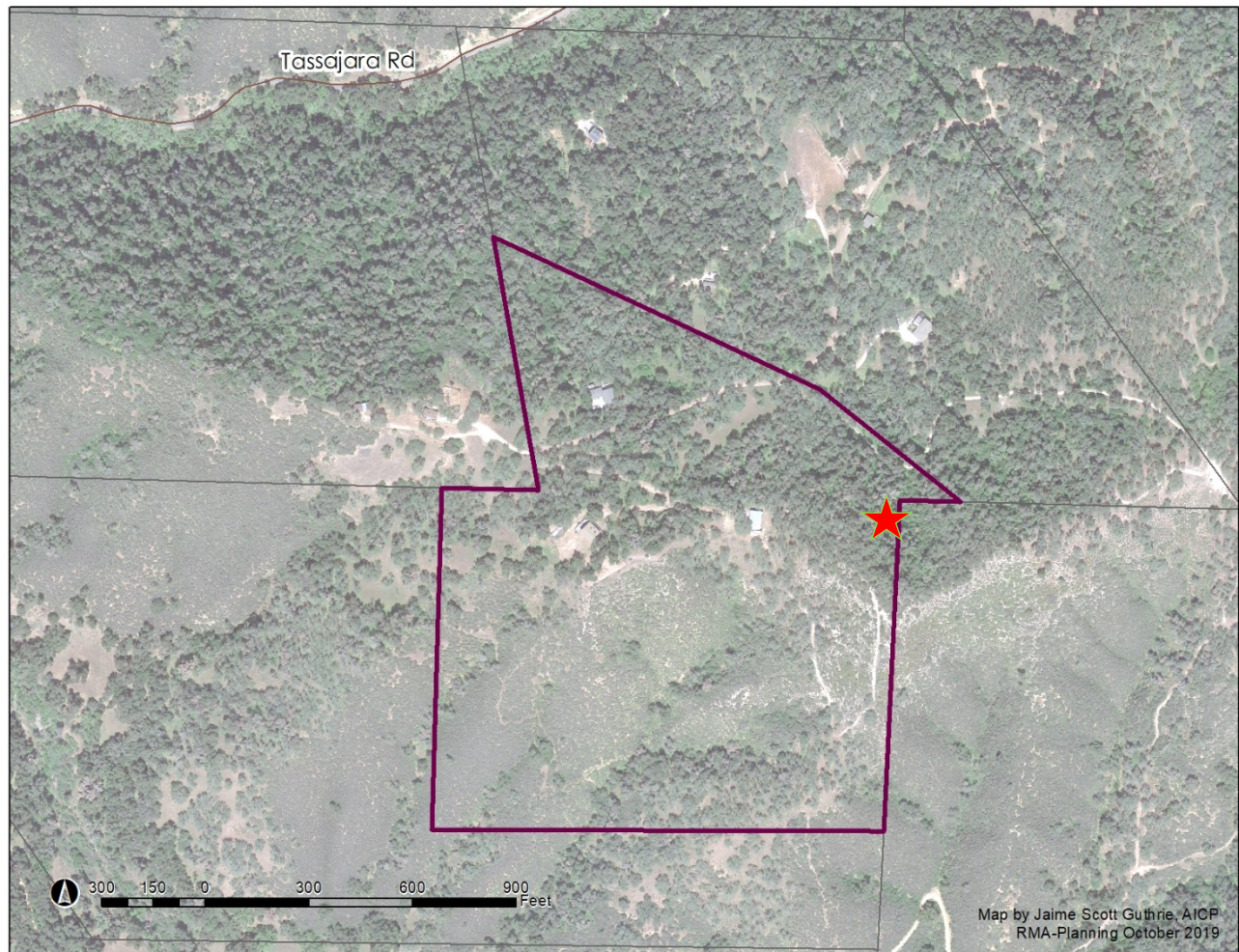
Subsequent to obtaining the above discretionary permit approval, the project would require ministerial approval from the Environmental Health Bureau, RMA-Public Works and Facilities, RMA-Environmental Services, and Cachagua Fire Protection District through the County's building permit process. In addition, any conditions of approval required by the reviewing agencies would require compliance prior to issuance and/or final of ministerial permits.

### **D. Potential Impacts Identified:**

The subject property does not contain Prime or Unique Farmlands or state protected forest land; does not contain environmentally sensitive habitat; has no evidence of historic, cultural, or tribal cultural resources; does not contain factors that would result in adverse impacts to geology or soils; is not in an area that poses a threat caused by flooding; and is not a mineral resource recovery site. Project implementation would not consume energy resources wastefully; does not



include residents or visitors who would require public services or recreation facilities; would not cause reduction of the existing level of services for fire, police, public schools, or parks; and would not require large amounts of potable water or create large amounts of wastewater. Therefore, the project would have no impact on agriculture and forest resources, biological resources, cultural resources, energy, geology/soils, hydrology/water quality, mineral resources, public services, recreation, tribal cultural resources, or utilities/service systems.



**Figure 2. Site Map** – Location of the WCF (red star) at 37501 Tassajara Road in Cachagua Area Plan of Monterey County. (Source: 1, 3, 10)

Potential impacts have been identified for aesthetics, hazards and hazardous materials, and wildfires. Conditions of approval have been incorporated to assure compliance with County requirements to the extent that they reduce to less than significant the identified potential impacts. See Section VI – Environmental Checklist of this Initial Study for discussion of aesthetics, hazards and hazardous materials and wildfires.

Potential impacts to air quality, greenhouse gas emissions, noise, and transportation are likely to result from temporary construction activities. These impacts have been analyzed and discussed in Section VI – Environmental Checklist of this Initial Study.

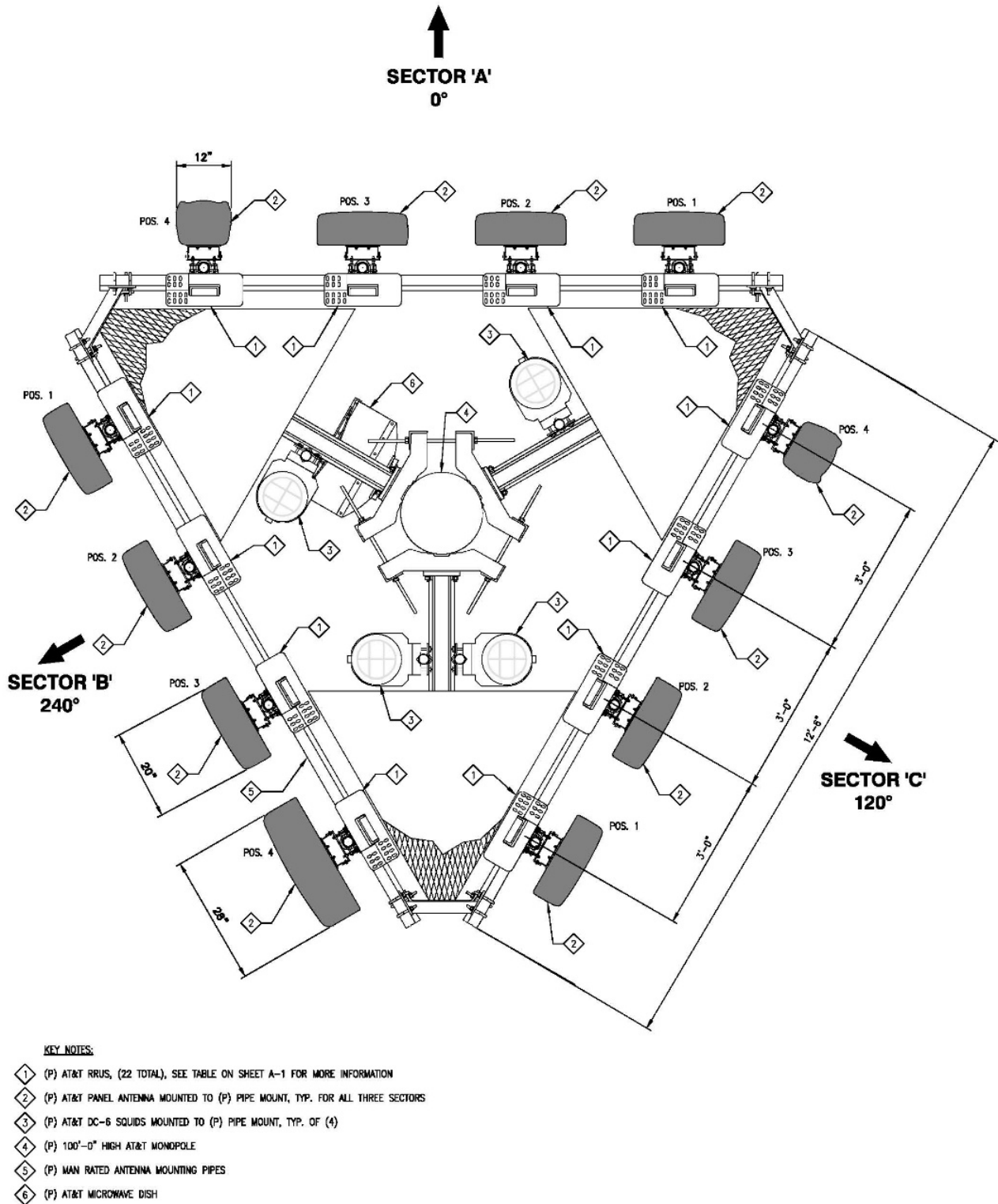


Figure 3. Plan View – Equipment located on the monopole. (Source: 1)

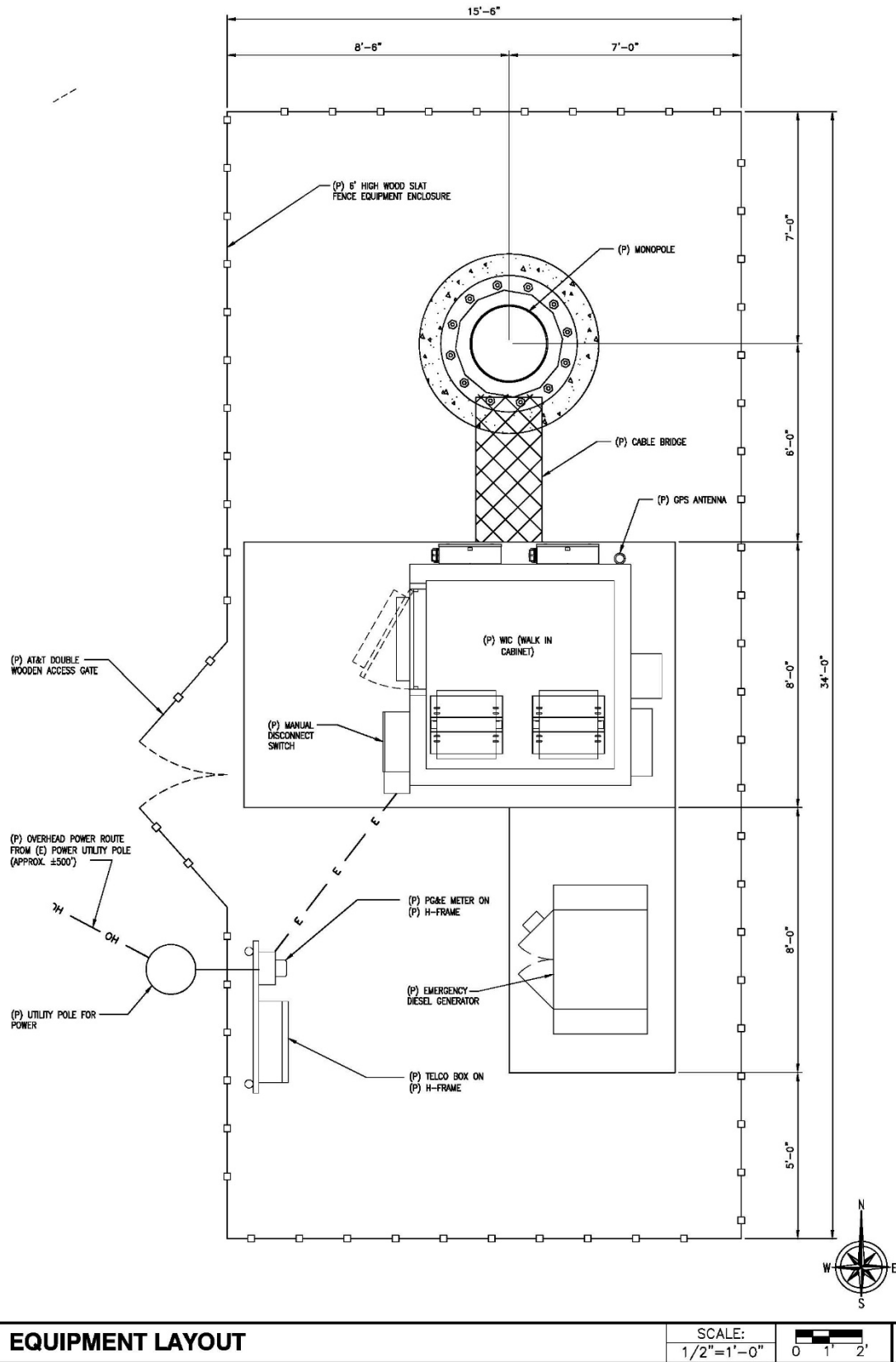


Figure 4. Plan View – Equipment located within the enclosure. (Source: 1)

### ***III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS***

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan	<input checked="" type="checkbox"/>	Air Quality Mgmt. Plan	<input checked="" type="checkbox"/>
Specific Plan	<input type="checkbox"/>	Airport Land Use Plan	<input type="checkbox"/>
Water Quality Control Plan	<input checked="" type="checkbox"/>	Groundwater Management Plan	<input type="checkbox"/>

#### ***2010 Monterey County General Plan***

The project site is subject to the *2010 Monterey County General Plan* (General Plan) which provides regulatory framework, through goals and policies, for physical development. The proposed project is consistent with the resource conservation land use designation of this site and with policies of the Open Space Element that regulate development for the protection of scenic resources. As proposed and conditioned, the Project is consistent with the General Plan. The General Plan and the zoning ordinance allow wireless communication facilities in all zoning districts subject to a permit in each case (Source: 2). **CONSISTENT.**

#### ***Air Quality Management Plan***

The Air Quality Management Plan (See Source 11) for the Monterey Bay Region addresses attainment and maintenance of state and federal ambient air quality standards within the North Central Coast Air Basin (NCCAB), including the Cachagua and Tassajara areas. No residential development is proposed; therefore, no population increase would occur that is not already accounted for in the AQMP. Construction emissions that would temporarily emit precursors of ozone are accommodated in the emission inventories of state- and federally-required air plans. The Project would not cause an increase of stationary emissions than what currently exists. (Source: 11) **CONSISTENT.**

#### ***Water Quality Control Plan***

The subject property lies within Region 3 of the Central Coast Regional Water Quality Control Board (CCRWQCB) which regulates sources of water quality related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. Operation of the unmanned facility would not generate pollutant runoff in amounts that would cause degradation of water quality, does not include implementation of a septic system, and does not require sewage disposal. **CONSISTENT.**

#### ***IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION***

##### **A. FACTORS**

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

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

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

- ☐ Check here if this finding is not applicable

**FINDING:** For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

**EVIDENCE:** VI.02 Agricultural and Forest Resources – Data contained within the Monterey County Geographic Information System (GIS) indicates that the subject property does not contain farmland that is Prime, Unique, or of Statewide or Local Importance; nor is it encumbered by a Williamson Act contract. There are no ongoing agricultural uses either on the property or in the immediate vicinity. The



subject property is not considered a forest or timber resource inventoried with the State of California as a “Demonstration State Forest”. Therefore, the Project would not result in conversion of prime agricultural lands to non-agricultural uses or impact agricultural resources and would have no impact on forest resources. (Source: 1, 2, 3, and 6) **NO IMPACT**

VI.04 Biological Resources – The 527 sf lease area does not encroach upon or modify a habitat for any riparian community, sensitive or special status species, or state or federally protected wetlands. There is no known migratory path for movement of any native resident or wildlife species, nor is there an existing native wildlife nursery at or near the site. The project would not conflict with any local policies or ordinances protecting biological resources or with provisions of any local, regional, or state adopted or approved habitat conservation plan. Therefore, the project would neither directly nor indirectly adversely affect any biological resources. (Source: 1, 2, 3, 6, 29, and 30 ) **NO IMPACT**

VI.05 Cultural Resources – Data contained within the Monterey County Geographic Information System (GIS) indicates the property is high status for archaeological sensitivity, theretofore requiring an archaeological report pursuant to Section 21.66.050.C of Title 21. Phase 1 Cultural Assessment was prepared by Carrie D. Wills, M.A., RPA of Helix Environmental Planning, Inc. on 16 November 2018 and concludes there is no evidence of cultural resources at the site. No historical resources or human remains are located at the proposed site for development of the lease area. Therefore, no cultural resources would undergo substantial adverse change in the significance as a result of the project. (Source: 1, 6, 12, and 13) **NO IMPACT**

VI.06 Energy – A new power pole will be connected to an existing power pole on the property approximately 500 feet from the 527 sf lease area and monopole. Although no renewable energy source is proposed, implementation of the project would require no more energy than that expected for the WCF from conventional means of providing energy to the project. The project will be required to operate in accordance with the 2019 Building Energy Efficiency Standards of Title 24, Part 6 California Energy Code which is the County’s adopted Energy Code (Chapter 18.06). Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and would not conflict with a state or local plan for energy efficiency. (Source: 1, 5, 6, and 21) **NO IMPACT**

VI.07 Geology/Soils – The project does not include residential development, septic tanks or wastewater disposal systems, and the nearest existing residence is over 800 feet west of the WCF location. Review of the project by RMA-Environmental Services (ES) did not indicate the potential for substantial soil erosion, destabilized soil or geologic unit, or expansive soils that might be a risk to life or property. The project would not expose people or structures to the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides. The project is not subject to the *Alquist-Priolo Earthquake Fault Zoning Act (A-P Act)* and the site is located at

least half a mile from the locally identified Tularcitos fault. Therefore, the project would not result in adverse impacts to geology or soils. (Source: 1, 3, 6, 16, and 20) **NO IMPACT**

VI.10 Hydrology/Water Quality – The application and plans were distributed to RMA-ES and Environmental Health Bureau (EHB) during the project review period and neither department indicated the unmanned WCF would substantially contribute pollutants to degrade runoff water quality or volume to stormwater drainage systems. The project does not include housing and would not expose people or structures to hazards due to flooding. The site is not susceptible to inundation by seiche or tsunami, and location atop steep hill precludes mudflow hazard. Therefore, the project would not result in adverse impacts to hydrology or water quality. (Source: 1, 6, 17, and 18) **NO IMPACT**

VI.12 Mineral Resources – Based on the data contained in the Monterey County Geographic Information System (GIS), it has been verified that there are no mineral resources for commercial use on the site, and the project does not include mining of mineral resources. Therefore, the project would not result in the loss of availability of mineral resources. (Source: 1 and 6) **NO IMPACT**

VI.15 Public Services – The unmanned WCF would not substantially increase the need for public services or facilities provided by Cachagua Fire Protection District, Monterey County Sheriff Department, schools within the Carmel Unified School District, or public parks. Therefore, no adverse impacts would occur to public services as a result of implementation or operation of the WCF in this location. (Source: 1, 3, 6 and 7) **NO IMPACT**

VI.16 Recreation – Implementation of the WCF does not trigger the need to provide park or recreation land and/or in-lieu fees established by the 1975 Quimby Act, nor would the project result in any increase of the use of existing neighborhood and regional parks or other recreational facilities, causing substantial physical deterioration. No construction or expansion of recreation facilities is included or required nor would the unmanned WCF create significant recreational demands. (Source: 1, 3, 6, and 7) **NO IMPACT**

VI.18 Tribal Cultural Resources – The project is on a parcel identified in County GIS records as being in an area of high sensitivity for potential cultural resources. In accordance with Public Resources Code Section 21080.3.1, formal notification of application for this planning permit was sent to the Esselen Tribe of Monterey County and to the Salinan Tribe on 30 September 2019. Neither tribe requested a tribal consultation. Therefore, no tribal consultation was conducted for this project. (Source: 1, 6, 12, and 13) **NO IMPACT**

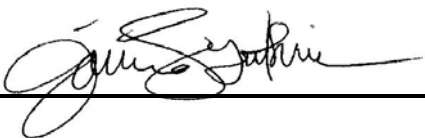
VI.19 Utilities and Service Systems – The proposed WCF is unmanned and operation will require periodic maintenance and repair that would not substantially increase the need for wastewater treatment, municipal water, stormwater drainage, or landfill capacity. Implementation of the WCF would require insubstantial

amounts of solid waste disposal and temporary portable restroom facilities, removed upon construction completion of the project. Therefore, the project would not increase demands on utility services or systems capacity. (Source: 1 and 6) **NO IMPACT**

**B. DETERMINATION**

On the basis of this initial evaluation:

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

  
\_\_\_\_\_  
Signature  
Jaime Scott Guthrie, AICP, Associate Planner

9/14/20  
\_\_\_\_\_  
Date

## ***V. EVALUATION OF ENVIRONMENTAL IMPACTS***

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).
- 2) All answers must take into account the whole action involved, including offsite as well as onsite, 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 XVII, "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) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

## VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Have a substantial adverse effect on a scenic vista? (Source: 1, 2, 3, 6, 7, 8, & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Source: 1, 2, 3, 6, 7, 8, 9, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	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? (Source: 1, 2, 3, 6, 7, 8, 9 & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (Source: 1, 3, 4, 6, 7, 8, 9, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion:

The 60-foot WCF monopole is proposed on a hilltop near Carmel Valley Road and Tassajara Road. General Plan Policy OS-1.3 prohibits “ridgeline development,” defined as development on the crest of a hill which has the potential to create a silhouette against the sky or other substantial adverse impact when viewed from a common public viewing area. A “common public viewing area” is defined as an area (e.g., public street or road, designated vista point, commonly utilized area of a public park) from which the general public ordinarily views the surrounding viewshed. A “substantial adverse visual impact” is defined as the material degradation of an existing visual experience, considering the condition of the existing viewshed, and the proximity and duration of view when observed with normal unaided vision. The 60-foot tall monopole would be visible from segments of Carmel Valley Road, which is designated “highly sensitive” in Figure #12 that shows Scenic Highway Corridors & Visual Sensitivity within the Cachagua Area Plan (CAP) of the 2010 Monterey County General Plan (General Plan). Policy CACH-3.1 of the CAP provides that landscaping and new development within areas designated as “sensitive” or “highly sensitive” may be permitted if located and designed in such a manner that public views are not disrupted. (Source: 1, 2, and 3)

The application first came in requesting approval of a 100-foot monopole disguised as a pine tree. The applicant provided a balloon viewing during the late morning on 21 August 2019 by floating a 4-foot diameter red balloon at the proposed 100-foot height, and at 75- and 50-foot heights at the proposed WCF lease area. The Cachagua Land Use Advisory Committee (LUAC) mobilized the community, inviting citizens to strategically place themselves at public viewing areas along Carmel Valley Road where the balloon could be seen potentially. A community member flagged stations at intervals along Carmel Valley Road for potential sighting of the

balloon. The balloon was kept in the air for each of the three heights (100, 75, and 50 feet, respectively) for ten minutes each. The project was placed on the 28 August 2019 meeting agenda of the Cachagua LUAC which was attended by thirty or so citizens. At the end of the meeting, the Cachagua LUAC requested the applicant implement a 50-foot monopole disguised as an elm tree. (Source: 1, 7, and 9)

**1(b). Conclusion: No Impact.**

The proposed location of the WCF lease area is not within view of a state scenic highway. Therefore, no scenic resources within view of a state scenic highway would be impacted due to project implementation at the proposed location. (Source: 1, 2, 3, 6, 7, 8, 9, and 19)

**1(a), (c), and (d). Conclusion: Less Than Significant Impact**

Implementation of the WCF project could be a potential new source of substantial light or glare. However, the facility will be unmanned and humans will be onsite only for periodic maintenance and repair. Further, Condition No. 7 – Reduce Visual Impacts requires that to avoid potential for the facility to create a new source of substantial light or glare, maintenance and repair visits are scheduled during daylight hours and no beacon lighting be allowed. This condition also requires that all colors and materials used at the facility be non-reflective. Therefore, as conditioned, the project's environmental impact due to adverse effect of day or nighttime views is reduced to less than significant.

The visibility of the monopole from Carmel Valley Road could have a potentially substantial adverse effect on a scenic vista (**Figure 5**), particularly at the original height proposal of 100 feet. During the balloon viewing at each of three heights (100, 75, and 50 feet, respectively) at the proposed WCF lease area, the balloon (monopine) was visible with the naked eye. (See **Figures 6-8**) The 50-foot height (**Figure 8**) had the least imposing visual impact of the three heights. However, at 50 feet, the monopine would still create a silhouette against the sky, which defines ridgeline development.

Condition of the existing viewshed:

Much of the area along Carmel Valley Road near the intersection of Tasajara Road is cattle grazing land surrounded by hills and natural vegetation. Fences, gates, and some development including a residence and barn are visible from Carmel Valley Road. Existing vegetation is mostly oaks and grasslands which are not taller than 30-40 feet adjacent to the monopine. The 100-foot monopine would be 70 feet taller than the surrounding vegetation. The 75-foot monopine would be 45 feet taller, and the 50-foot monopine 10-20 feet taller, than the surrounding vegetation.

Proximity and duration of view:

The public viewing area in question would be the designated visually sensitive Carmel Valley Road. The proposed tower location is approximately 0.66 mile from the closest point of visibility along Carmel Valley Road and the extent of sight of the tower with normal unaided vision is shown in **Figures 6-8** of this initial study. The figures show that material degradation of the visual experience is least impactful at the 50-foot height (**Figure 8**). The duration of tower visibility is for about half a mile distance along Carmel Valley Road. In summary, a 60-foot tower would likely be visible for half a mile at or greater than 0.66 mile distance from Carmel Valley Road.

### Visual Experience:

Carmel Valley Road contains a variety of visual experiences from the western terminus with Highway 1 (which is more populated) to the eastern terminus with Arroyo Seco Road (which is very rural in nature). This project would be located east of Carmel Valley village in a sparsely populated stretch of the narrow and winding road, near the intersection of Tassajara Road. In this location Carmel Valley Road terrain becomes flat near the road with grasslands and scattered oaks. Cattle grazing, fencing, barns, and structures are visible in this location. Grass and Oak covered hills and hillsides are visible to both the North and South of Carmel Valley Road in this location. The intersection with Tassajara Road is an area of Carmel Valley Road where man made features are present.

The proposed monopine would be located on top of a ridge setback over half a mile from Carmel Valley Road. The monopine would protrude above the existing vegetation line and would be visible with unaided vision from a half mile stretch of Carmel Valley Road, east of the intersection with Tassajara Road. At 60 feet in height, with non-reflective elm or pine visual treatments, at a distance of 0.66 miles south of Carmel Valley Road, and given the nature of the viewing experience in the Tassajara/Carmel Valley Road intersection area, the proposed impact on the viewing experience would not be substantial. The monopine would introduce a new feature on a distant hillside at a sufficient distance to attenuate the severity of the impact on the viewing experience. Natural terrain and vegetation along with human development will remain visible in this location after construction of the monopine.

### Alternative Locations:

An alternate site that was considered on the same property would not have been visible at any height from Carmel Valley Road or any other public viewing area, even at the proposed 100 feet; however, the applicant has indicated this alternate location would provide minimal coverage to the community. One other communication tower in the Cachagua area and currently collocated with AT&T equipment, is located approximately 6.88 miles, as the crow flies along Tularcitos Ridge, from this proposed tower location. The height of the pole is 51 feet above an elevation of 1,469.5 feet within the Sleepy Hollow community northwest of the subject property. Communication coverage from the Sleepy Hollow WCF to the Cachagua community, nearly seven miles away, would require signals to climb through or around hills up to and above 2,100 feet. Therefore, no feasible alternative location exists to accommodate the proposed project.

The WCF is being proposed to provide communication infrastructure where none exists for the residents or police, firefighters, and other emergency personnel in the Cachagua community. Provision of the WCF on the subject property best achieves the policy objective of the Cachagua Area Plan Section 4.0 – Safety to assist the community in ensuring a minimum level of fire protection and related services for the area residents (Policy CACH-4.3). A member of the Cachagua FPD attended the community meeting and expressed support for implementation of the WCF. The current inability to communicate to emergency service providers isolates the community in times of danger or accidents, and delays call and response times.  
(Source: 1, 2, 3, 4, 6, 7, 8, 9, and 19)





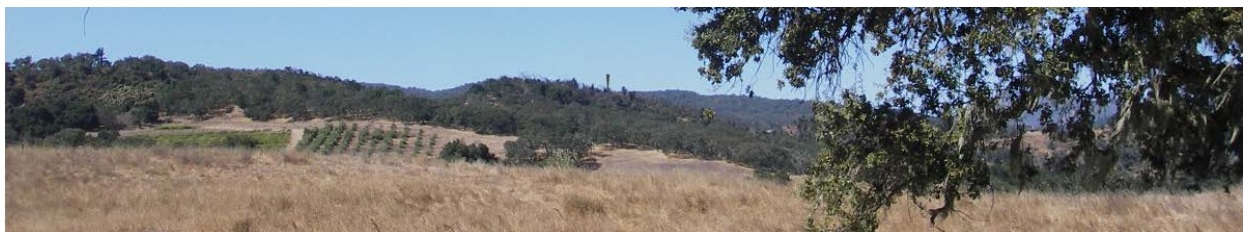
**Figure 5. Site Photo** – Scenic view from Carmel Valley Road with no red balloon aloft at proposed location of the WCF at 37501 Tassajara Road. (Source: 1 and 7)



**Figure 6. Site Photo** – Red balloon aloft 100 feet at proposed location of the WCF at 37501 Tassajara Road. Scenic view from Carmel Valley Road. (Source: 1 and 7)



**Figure 7. Site Photo** – Red balloon aloft 75 feet at proposed location of the WCF at 37501 Tassajara Road. Scenic view from Carmel Valley Road. (Source: 1 and 7)



**Figure 8. Site Photo** – Red balloon aloft 50 feet at proposed location of the WCF at 37501 Tassajara Road. Scenic view from Carmel Valley Road. (Source: 1 and 7)

## 2. AGRICULTURAL AND FOREST 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 Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion/Conclusion:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

### 3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan? (Source: 1 & 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality? (Source: 1 & 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in significant construction-related air quality impacts? (Source: 1 & 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations? (Source: 1, 6, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Source: 1, 6, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion:

The California Air Resources Board (CARB) coordinates and oversees both state and federal air quality control programs in California. The CARB has established 14 air basins statewide and the project site is located in the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of the Monterey Bay Air Resources District (MBARD). The MBARD is responsible for producing an Air Quality Management Plan (AQMP) that reports air quality and regulates stationary sources throughout the NCCAB. The *2008 Air Quality Management Plan for the Monterey Bay Region (AQMP)* and the *2012-2015 Air Quality Management Plan (AQMP)* are referenced for discussion of air quality. Monterey County is within the federal and state attainment standards for carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), lead, and fine particulates (PM<sub>2.5</sub>), and within the federal attainment standards for ozone (O<sub>3</sub>) and respirable particulates (PM<sub>10</sub>). The *2012-2015 Air Quality Management Plan (AQMP)* addresses only attainment of the State ozone standard. (Source: 11)

#### 3(a), (d) and (e). Conclusion: No Impact

As previously discussed in Section III of this Initial Study, the project has been found to be consistent with the AQMP. Therefore, there would be no impact caused by conflict or obstruction of the AQMP. At present, Monterey County is in attainment for all federal and state air quality standards for Carbon monoxide (CO), Nitrogen dioxide (NO<sub>2</sub>), Sulfur Dioxide (SO<sub>2</sub>), lead, and fine particulates (PM<sub>2.5</sub>). Implementation of the project would result in temporary emissions of CO, NO<sub>2</sub>, SO<sub>2</sub>, lead, and PM<sub>2.5</sub> during construction and grading activities; however, these would be well within the emittance levels accommodated within the AQMP; therefore, there would be no impact. The subject property is an existing industrial site and is not

in an area where sensitive receptors, such as housing or schools, would be affected by construction and/or grading activities. Furthermore, the production of objectionable odors during construction activities and the operational component of the project have not been identified. The project does not include residential development and would not result in a population increase not already accounted for in the AQMP. The project would not result in a change to current stationary emissions. (Source: 1, 6, 11 and 19)

### 3(b) and (c). Conclusion: Less Than Significant Impact.

The NCCAB is in nonattainment status of state standards for Ozone (O<sub>3</sub>) and respirable particulates (PM<sub>10</sub>) (See Source 10, p. 9). Therefore, projects resulting in a substantial increase in PM<sub>10</sub> emissions would cause a significant impact to air quality. In addition, ambient ozone levels depend largely on the amount of precursors, nitrogen oxide (NO<sub>x</sub>) and reactive organic gases (ROG), emitted into the atmosphere. Implementation of the project would result in temporary impacts resulting from construction and grading activities caused by dust generation and fuel combustion of construction vehicles (major sources of primary PM<sub>10</sub>) and NO<sub>x</sub> and ROG emittance. Typical construction equipment would be used for the project and no more than 20 cubic yards of grading is anticipated for implementation of the entire 527 sf facility. Therefore, these emissions would have a less than significant impact to air quality. Construction-related air quality impacts would be controlled by implementing Monterey County Code Chapter 16.12. standard conditions for erosion control that require plans for control measures of runoff, dust, and erosion. Therefore, implementation of the proposed project, would result in less than significant impacts to air quality caused by pollutants currently in non-attainment for NCCAB and construction-related activities. (Source: 1 and 11)

4. BIOLOGICAL RESOURCES	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Source: 1, 2, 3, 6, & 30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Source: 1, 2, 3, 6, & 30)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? (Source: 1, 2, 3, 6, & 32)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



<b>4. BIOLOGICAL RESOURCES</b>				
<b>Would the project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Source: 1, 2, 3, & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

<b>5. CULTURAL RESOURCES</b>				
<b>Would the project:</b>	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? (Source: 1, 3, 5, 7, 14, 15, 16, 17 & 20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Source: 3, 5, 7, 14, 15, 16 & 17)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries? (Source: 3, 5, 7, 14, 15, 16, & 17)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

<b>6. ENERGY</b>		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>					
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Source: 1, 3, 4 & 23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Source: 1, 3, 4 & 23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion/Conclusion:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

<b>7. GEOLOGY AND SOILS</b>		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>					
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? (Source: 1 and 7) Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii)	Strong seismic ground shaking? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii)	Seismic-related ground failure, including liquefaction? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv)	Landslides? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in substantial soil erosion or the loss of topsoil? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

7. GEOLOGY AND SOILS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
d)	Be located on expansive soil, as defined in Chapter 18A of the 2016 California Building Code, creating substantial risks to life or property? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? (Source: 1, 3, 5 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion/Conclusion:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

8. GREENHOUSE GAS EMISSIONS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Source: 1 & 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Source: 1 & 11)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion:

Greenhouse gases (GHG) are emitted by natural processes and human activities such as electricity production, motor vehicle use, and agricultural uses. To reduce the statewide level of GHG emissions, the State Legislature adopted California Assembly Bill 32 (AB 32) California Global Warming Solutions Act of 2006. AB 32 established a comprehensive statewide program of regulatory and market mechanisms to achieve reductions in GHG emissions, thereby reducing the State's vulnerability to global climate change. As in the discussion of VI.3 Air Quality of this Initial Study, the *2008 Air Quality Management Plan for the Monterey Bay Region (AQMP)* and the *2012-2015 Air Quality Management Plan (AQMP)* are referenced for discussion of greenhouse gases (GHGs). The *2012-2015 Air Quality Management Plan (AQMP)* only addresses attainment of the State ozone standard and builds on information developed in past AQMPs. The Monterey Bay Air Resources District (MBARD) is responsible for the monitoring of air quality and the regulation of stationary sources throughout the North Central Coast Air Basin (NCCAB) where the proposed project site is located. The MBARD produces the AQMP and all subsequent revisions.

**8(b). Conclusion: No Impact.**

Implementation of the proposed project would not conflict with any *AQMP* goals or policies for reducing emissions of greenhouse gases.

**8(a). Conclusion: Less Than Significant.**

As previously discussed, ambient ozone levels depend largely on the amount of precursors, nitrogen oxide (NO<sub>x</sub>) and reactive organic gases (ROG), emitted into the atmosphere.

Implementation of the project would result in temporary impacts resulting from construction and grading activities that require fuel combustion of construction vehicles, a primary source of NO<sub>x</sub> and ROG emittance. Typical construction equipment would be used for the project and ROG and NO<sub>x</sub> emitted from that equipment have already been accommodated within the *AQMP*.

Therefore, these precursor emissions would have a less than significant impact on GHGs. No more than 20 cubic yards, or approximately 0.01 acre-foot, of grading is anticipated for implementation of the entire 527 sf facility, during a finite period of time. This temporarily generated amount is well under the recommended 2.2 acres per day, or 82 lb/day, threshold of significance of grading and excavation during construction phases. Therefore, the proposed project would have less than significant impact on GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS	Less Than Significant			
	Potentially Significant Impact	With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Source: 1, 6, 7, 9 & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Source: 1, 6, 7, 9, 14 & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Source: 1, 6, 7, 9, 14 & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Source: 1, 6, 7, 9, 14 & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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? (Source: 1, 6, 7, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



9. HAZARDS AND HAZARDOUS MATERIALS				
	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>				
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Source: 1, 15, & 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Source: 1 & 24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion:

The Federal Communications Commission (FCC) requires of each wireless communication facility (WCF) compliance with limits set for human safety in exposure to radiofrequency energy. An Electromagnetic Energy (EME) Exposure Report was prepared by OSC Engineering for the 100-foot tower that was originally proposed. The applicant reduced the height of the tower proposal to 60 feet after considerable public input and requests that were analyzed by the applicant for feasibility. An updated EME report will be required prior to issuing a building permit for the construction of the 60 foot tower.

### 9(a), (b), (d), (e), (f), and (g). Conclusion: No Impact.

The application and plans were distributed to Cachagua Fire Protection Department (FPD) and Environmental Health Bureau (EHB) during the project review period and neither department indicated the unmanned WCF would include the transport or disposal of hazardous materials or interfere with an adopted emergency response or evacuation plan. No demolition will take place, no existing or proposed school is within a quarter mile of the site, nor is the site within two miles of a public airport. The unmanned WCF at a distance of 800 feet to the nearest residence, would not expose people to significant risk of loss, injury, or death involving wildland fires.

### 9(c). Conclusion: Less Than Significant.

The project is not within a quarter mile of an existing or proposed school. However, the project would emit radio frequency (RF) that is monitored by the Federal Communications Commission (FCC) for safe levels of exposure. Therefore, the County required submittal of a technical report for analysis of the proposed project modeled for equipment emissions in relation to relevant FCC RF compliance standards. The Electromagnetic Energy Exposure (EME) Report prepared by OSC Engineering on September 10, 2018 modeled the project as if operating at one hundred percent capacity at the original 100-foot height proposal. Although communication facilities do not generally always operate at full capacity, simulating maximum operational power yields the maximum potential exposure levels. Report results show that at the maximum operational scenario, the project would be 3.8% of the FCC Maximum Permissible Exposure (MPE) Limit for the general population. General population MPE limits are applied to situations in which people who may not be aware of potential exposure to RF electromagnetic field (EMF) radiation cannot exercise control over their exposure (e.g., residents of a nearby neighborhood, employees occupying a nearby office building). The project would comply with FCC regulations limiting people to RF EMF radiation.

A factor in determining the MPE level within FCC regulations is the distance from the height of the antenna center (maximum radiation) on the tower to the height of the object of interest, such as a person or building. The antenna center will be lower on a 60-foot tower (50 feet high) than on a 100-foot tower (90 feet high), the distance from the antenna to the object of interest will be shorter. This shorter distance indicates closer proximity to the source of radiation on a 60-foot tower than on a 100-foot tower. The 100-foot tower operating at full capacity was shown to be 3.8% FCC MPE Limit for the general population. Conservatively, the lower tower height may indicate greater exposure. Therefore, a condition is applied to the project that requires a new technical report be submitted that quantitatively analyzes the RF EMF radiation exposure potential of the 60-foot tower prior to allowing construction permits. All WCFs are mandated to comply with and conduct annual performance evaluations for compliance with FCC regulations governing human exposure to radiation from communication tower equipment. Project implementation, as proposed and conditioned, would reduce potential impacts to less than significant.

<b>10. HYDROLOGY AND WATER QUALITY</b>					
		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>					
a)	Violate any water quality standards or waste discharge requirements? (Source: 1, 2, 7 & 25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (Source: 1, 2, 7 & 25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial <u>erosion or siltation</u> on- or off-site? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in <u>flooding</u> on- or off-site? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	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? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Otherwise substantially degrade water quality? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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**10. HYDROLOGY AND WATER QUALITY**

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (Source: 1, 2 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (Source: 1, 2, 7 & 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow? (Source: 1, 2, 7 & 26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

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**11. 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? (Source: 1, 2, 3, & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Source: 1, 2, 3, 4 & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (Source: 1, 2, 3, & 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

The proposed project is subject to the goals and policies set forth in the Cachagua Area Plan (CAP) within the *2010 Monterey County General Plan* (General Plan). Figure #12 exhibits Scenic Highway Corridors & Visual Sensitivity in the CAP. Policy CACH-3.1 requires that landscaping and new development within areas designated as “sensitive” or “highly sensitive”

may be permitted if located and designed in such a manner that public views are not disrupted. The General Plan Policy OS-1.2 requires that development in designated visually sensitive areas be subordinate to the natural features of the area. Policy OS-1.3 prohibits “ridgeline development,” defined as development on the crest of a hill which has the potential to create a silhouette against the sky or other substantial adverse impact when viewed from a common public viewing area. Policies in the Conservation and Open Space (OS) Element of the General Plan support Goal OS-1 to retain the character and natural beauty of Monterey County by preserving, conserving, and maintaining unique physical features and natural resources. Chapter 21.64.310 of Title 21 (WCF ordinance) regulates the siting, design, and construction of wireless communication facilities in Monterey County.

**11(a) and (c) Conclusion: No Impact.**

Location of the WCF lease area at the proposed site would not cause a divisional barrier to an established community. There is no habitat conservation plan (HCP) or natural community conservation plan (NCCP) approved on the subject property or within the area. Therefore, the project would have no impact on either an established community or a conservation plan.

**11(b). Conclusion: Less Than Significant**

The monopole at the proposed location is ridgeline development that is visible from segments of Carmel Valley Road, which is designated “highly sensitive” in Figure #12 that shows Scenic Highway Corridors & Visual Sensitivity within the CAP. The 60-foot WCF monopole is proposed on a hilltop at approximately 2,000 feet elevation which could potentially disrupt public views from Carmel Valley Road (See Figures 5, 6, & 7 in VI.1 – Aesthetics). As previously discussed in VI.1 – Aesthetics, the combination of blue sky background and the height of surrounding vegetation provides no camouflage to subordinate the monopine in the viewshed of the designated visually sensitive Carmel Valley Road. Therefore, the project is in potential conflict with Policy CACH-3.1 of the CAP and with General Plan Policies OS-1.2 and OS-1.3 that require: 1) landscaping and new development within areas designated as “sensitive” or “highly sensitive” may be permitted if located and designed in such a manner that public views are not disrupted, 2) development in designated visually sensitive areas be subordinate to the natural features of the area, and 3) prohibits “ridgeline development,” defined as development on the crest of a hill which has the potential to create a silhouette against the sky or other substantial adverse impact when viewed from a common public viewing area.

Policy OS-1.3 of the General Plan, prohibits ridgeline development with exceptions to include consideration at a publicly noticed hearing, of findings that:

- 1) the development does not create a substantially adverse visual impact when viewed from a common public viewing area, and either
- 2) goals, policies, and objectives of the General Plan and Cachagua Area Plan are better achieved with the proposed plan than other alternatives, or
- 3) there is no feasible alternative to the ridgeline development.

In this case, the development will have a less than substantial visual impact (See Section VI.1 – Aesthetics). Alternatives to the height and location of the proposed development have been considered and were found to be infeasible because they would not provide service to the areas that have coverage gaps or because permissions from property owners could not be obtained. The Planning Commission will need to consider specific findings with supporting evidence to

permit the ridgeline development before the project is approved. Other than the visual impact, no other significant issues or potential conflicts have been identified. As described herein, the ridgeline development may be allowed provided the Planning Commission makes findings required by the General Plan and zoning.

<b>12. MINERAL RESOURCES</b>			Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project:</b>		Potentially Significant 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? (Source: 1, 7 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Source: 1, 7 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

<b>13. NOISE</b>			Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>Would the project result in:</b>		Potentially Significant Impact			
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

13. NOISE		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:					
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 expose people residing or working in the project area to excessive noise levels? (Source: 1, 7 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Source: 1, 7 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion/Conclusion:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

14. POPULATION AND HOUSING		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Induce substantial 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)? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion:

Operation of the unmanned facility will require periodic visits for maintenance and repair, and will not accommodate the needs of residents, visitors, or employees. The operational aspect of the project requires implementation of a new power pole connecting with overhead lines to an existing power pole approximately 500 feet from the WCF lease area.

#### 14(b) and (c). Conclusion: No Impact.

The project does not include housing or people who need housing. Therefore, implementation of the project would displace neither substantial numbers of people nor existing housing.



**14(a) Conclusion: Less Than Significant Impact.**

Implementation of the project is intended to bring wireless phone service to approximately 132 residents of the Cachagua area who do not currently have access to wireless phone service. The sparsely populated community would benefit from a wider network of wireless phone service, especially to accommodate citizen contact and emergency response of the Cachagua FPD and other first responders throughout the County. Wireless communication infrastructure in the Cachagua community could provide indirect incentive to move to the area. However, availability of housing and amenities does not support population growth in the area and cellular service is not a significant growth factor on its own. Therefore, the project has potential for less than significant impact on population growth.

15. PUBLIC SERVICES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:					
a)	Fire protection? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Police protection? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Schools? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Parks? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e)	Other public facilities? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

16. RECREATION		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	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? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? (Source: 1 & 9)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion/Conclusion:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

17. TRANSPORTATION/TRAFFIC		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b)	Conflict with the goals, objectives, and policies of the 2018 Regional Transportation Plan for Monterey County, including, but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Agency for Monterey County (TAMC) for designated roads or highways? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

17. TRANSPORTATION/TRAFFIC		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
e)	Result in inadequate emergency access? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Source: 1, 2, 3, 4, 5 & 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Discussion:

The subject parcel location is accessed via Tassajara Road for which Level of Service has not been rated. (See Source 3). Construction activities for implementation of the project at the 527 sf lease area would cause temporary increase in truck traffic along Carmel Valley Road and continuing onto Tassajara Road.

### 16(b), (c), (d), (e), and (f) Conclusion: No Impact.

Development of the proposed project on the subject parcel would not have an impact on air traffic patterns, increase of hazards or incompatible uses, or adequate emergency access. The project would not conflict with any Complete Streets policies, plans, or programs; therefore, implementation of this project would have no impact on public transit, bicycle, and pedestrian facilities. Development of the WCF would not conflict with the 2018 Regional Transportation Plan goals, objectives, or policies for Monterey County; therefore, no adverse impacts are likely to occur on standards established by the Transportation Agency for Monterey County (TAMC) for any designated roads or highways. (See Source 21)

### 16(a) Conclusion: Less Than Significant Impact.

Minor increase in traffic during construction of the project would be temporary; therefore, impacts due to a temporary increase in construction traffic would be less than significant.

18. TRIBAL CULTURAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
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 (Source: 1, 2, 3, 4, 5, 7, 12, 13, 14, & 17)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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. Source: 1, 2, 3, 4, 5, 7, 12, 13, 14, & 17)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:** See previous Sections II.A (Project Description), II.B (Environmental Setting), IV.A (Environmental Factor Potentially Affected), as well as sources listed in Section IX.

19. UTILITIES AND SERVICE SYSTEMS		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Source: 1)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Source: 1 & 25)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Source: 1)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<b>19. UTILITIES AND SERVICE SYSTEMS</b>				
<b>Would the project:</b>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Source: 1 & 25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion/Conclusion:**

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

<b>20. WILDFIRE</b>				
<b>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</b>	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? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? (Source: 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

Hazardous materials may comprise those that are flammable, including forest, brush and grasslands, which are present throughout the subject parcel. California Public Resources Code (PRC) Section 4291 regulates the fire protection mechanisms for fuel conditions in forested and wildland areas. The subject parcel is classified as a State Responsibility Area (SRA) for fire protection with a “very high” hazard for fire occurrence. Cachagua Fire Protection District (CFPD) has reviewed the project for design features adherent to PRC Section 4291 including the maintenance of a 100-foot buffer of defensible space and the use of non-flammable construction materials. There is no indication from CFPD that the plans for the proposed project would not comply with requirements of PRC Section 4291. (See Source 24)

**20(a). Conclusion: No Impact.**

The Jamesburg-Cachagua community is included in the *Monterey County Community Wildfire Protection Plan (MCCWPP)* as an area within the wildland urban interface (WUI) of the Ventana Wilderness that is at risk of fire hazard. The MCCWPP is an advisory document that was developed in 2010, with an update in 2016, in a multi-strata multi-agency collaboration with property owners and citizens, comprising the Monterey Fire Safe Council. No components of the project would substantially impair any strategies of the adopted *Monterey County Emergency Operations Plan* prepared by the County of Monterey Office of Emergency Services (OES) in 2014. (See Sources 14 and 23)

**20(b), (c), and (d). Conclusion: Less Than Significant Impact.**

The siting of the WCF lease area on the parcel is located on a small plateau 2,000 feet above mean sea level atop a steep slope. Outside the enclosure fence, a new power pole will be connected with overhead lines to an existing power pole on the property approximately 500 feet from the lease area. This additional infrastructure, along with slope and prevailing wind, could be combined factors that exacerbate wildfire risk. However, the equipment enclosure will be laid with concrete and surrounded by a gravel road. Further, two water storage tanks are located approximately 10 feet north of the relatively isolated location of the unmanned WCF lease area where homes and people are sparsely distributed throughout the properties toward Tassajara Road to the north. Given the unmanned operations of the project and the small area of impervious footprint along with the nearest residence approximately 800 feet away, the project is not likely to expose people or structures to significant risks, neither onsite nor downslope. Failure of equipment and infrastructure combined with weather events could produce circumstances that would be ameliorated with regular maintenance and repair of equipment at the facility and of supporting infrastructure. Therefore, Condition No. 12 requires recordation of a Deed Restriction mandating that equipment and infrastructure be maintained and repaired for deterioration or damage. The project, as conditioned, would have a less than significant effect on the environment due to wildfire.

**VII. MANDATORY FINDINGS OF SIGNIFICANCE**

NOTE: If there are significant environmental impacts which cannot be mitigated, and no feasible project alternatives are available, then complete the mandatory findings of significance and attach to this initial study as an appendix. This is the first step for starting the environmental impact report (EIR) process.

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Source: 1, 2, 3, 6, 7, 8, 9, and 19)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? (Source: 1, 2, 3, 4, 6, 7, 8, 9, and 19) ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Source: 1, 6, 9, 11, & 19)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Discussion:

Pursuant to Section 21083 of the Public Resources Code and Section 15065 of the CEQA Guidelines, a project would be considered to have a significant effect on the environment and an Environmental Impact Report shall be prepared, if impacts identified cannot be avoided or mitigated to a point where no significant effect on the environment would occur. Analysis provided in this Initial Study supports that implementation of the WCF at this location could have less than significant effect on the environment.

### VII(a), (b), and (c). Conclusion: Less Than Significant Impact.

Construction and grading activities during implementation of the project would cause temporary adverse environmental impacts for air quality, greenhouse gas emissions, noise, and transportation. However, these temporary impacts would discontinue during operational components of the project. Therefore, environmental effects on air quality, greenhouse gas emissions, noise, and transportation would cause less than significant adverse impacts on human beings.

One other WCF co-located with AT&T equipment serves the Sleepy Hollow community in the Cachagua area and is located almost seven miles from the proposed project. Staff is not aware of any similar projects that were implemented in the past, are being currently implemented, or will probably be implemented in the future with ridgeline location to serve the Cachagua community. Companies that propose communication towers in the County are required to make allowance for co-location of equipment from other companies that may propose future projects. Therefore, incremental contribution of similar projects with potential to degrade the aesthetic quality of the environment that conflict with the adopted area plan, General Plan, or zoning are not likely to



have cumulatively considerable impact on the environment. Persistently and consistently monitoring the potential for proliferation of similar projects in the Cachagua and Tassajara area is essential to preventing aesthetic quality degradation in the future.

## ***VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES***

### **Assessment of Fee:**

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a “de minimis” (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a “de minimis” effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of “de minimis” effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of “no effect” on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department’s website at [www.wildlife.ca.gov](http://www.wildlife.ca.gov).

**Conclusion:** The project will be required to pay the fee.

**Evidence:** Based on the record as a whole as embodied in the RMA-Planning files pertaining to PLN180362 and the attached Initial Study / Proposed Negative Declaration.

## ***IX. SOURCES***

1. Project Application/Plans for Planning File No. PLN180362
2. *2010 Monterey County General Plan*
3. Cachagua Area Plan
4. Title 21 (Zoning) of the Monterey County Code
5. Title 18 (Energy) of the Monterey County Code
6. Monterey County Geographic Information System (GIS)
7. Staff Site Visit on 21 August 2019.
8. *2019 CEQA Statute and Guidelines*
9. Accela Public Information Portal 2019-2020.
10. ArcGIS for Desktop 10.2.2.
11. The 2012-2015 Air Quality Management Plan (AQMP), including the 1991 AQMP and the 2009-2011 Triennial Plan Revision
12. California AB-52 Native Americans: California Environmental Quality Act 2014.  
Available from:  
[https://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB52](https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB52)
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25. California Public Resources Code. PRC Section 4291 of Division 4, Part 2, Chapter 3.
26. Cal-Fire. (2019). "Wildland Hazards & Building Codes." Accessed 5 November 2019. Available from: <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/>
27. California Building Standards Commission. (2018). *California Building Standards Code (CCR Title 24): 2019 Triennial Edition*. Accessed 5 November 2019. Available from: <http://www.bsc.ca.gov/Codes.aspx>
28. California Department of Water Resources. (2019). *SGMA Portal*. Accessed 3 December 2019. Available from: <http://sgma.water.ca.gov/portal/>
29. California Native Plant Society. (2010-2018). "Rare and Endangered Plant Inventory." Accessed 18 January 2018. Available from: <http://www.rareplants.cnps.org/glossary.html>
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