ENVIRONMENTAL INITIAL STUDY & NEGATIVE DECLARATION

Amendment 22-0003 to amend Use Permit 166-84 Vertical Bridge REIT, LLC

May 5, 2022

ENVIRONMENTAL INITIAL STUDY & NEGATIVE DECLARATION WITH References and Documentation

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

SHASTA COUNTY ENVIRONMENTAL CHECKLIST FORM INITIAL STUDY & NEGATIVE DECLARATION

1. Project Title:

Amendment 22-0003 to amend Use Permit 166-84 (Vertical Bridge REIT, LLC)

2. Lead agency name and address:

Shasta County Department of Resource Management, Planning Division 1855 Placer Street, Suite 103 Redding, CA 96001-1759

3. Contact Person and Phone Number:

David Schlegel, AICP, Senior Planner (530) 225-5532

4. **Project Location:**

The project is located in the Montgomery Creek area on a 631-acre parcel situated on Hatchet Ridge owned by Sierra Pacific Land and Timber Company and is accessed from an unnamed spur road on the south side of Bunchgrass Lookout Road and intersects Bunchgrass Lookout Road approximately 5.6 miles northwest of the Bunchgrass Lookout Road/California State Highway 299 East intersection. Assessor's Parcel Number: 027-120-007

5. Applicant Name and Address:

Vertical Bridge REIT, LLC 750 Park of Commerce Drive Boca Raton, FL 33487

6. General Plan Designation:

Timber (T)

7. Zoning:

Timber Production (TP)

8. Description of Project:

The request is to construct 93-foot-long by 27-foot-wide photovoltaic solar array, six (6) 35.42-foot-tall ground-mounted small wind turbines (43.42-foot tip height as measured from finished grade to vertical tip of the blade), wind and solar energy inverters and eleven (11) lithium batteries to be located in the existing utility building which serves an existing commercial wireless telecommunications facility on the site. The solar array, wind turbines, and batteries are proposed to serve as an unmanned standby generator for the purpose of providing backup power for the commercial wireless telecommunications facility in the event that energy from the electric grid is not available. The system components would generate 36 kilowatts (turbines) and 30 kilowatts (solar array) for a total of 66 kilowatts of generating capacity and incorporate a battery system with 30 kilowatts of capacity for energy storage. A 5,000-gallon water storage tank would be installed to provide fire protection water for the project. Portions of the project site are currently developed with large turbines that are part of the Hatchet Ridge Wind Project. In addition, the project site includes two radio towers and two wireless telecommunication facilities that are not a part of this project. The existing lattice radio tower includes an adjacent 1,986-square-foot building approved under Use Permit 166-84. The proposed use would utilize the existing access from Bunchgrass Lookout Road.

9. Surrounding Land Uses and Setting:

The project site spans a flat top spur ridge of Hatchet Ridge with steady downward slope on the northwest, southwest and southeast sides of the spur ridge. The spur ridge top is developed with several other wireless communication towers near the project lease area. A major wind energy project exists on Hatchet Ridge. Wind turbines associated

with that project are located near and east, south, and west of the proposed project. The greater surrounding area is actively managed timber production lands. Seasonal creeks exist within the project site, including Little Hatchet Creek and Bear Spring. The project does not propose to modify any water features.

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

N/A

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Public Resources Code (PRC) Section 21080.3.1, the Pit River Tribe (Tribe) filed and Shasta County received a request for formal notification of proposed projects within an area of Shasta County that is traditionally and culturally affiliated with the Tribe. Pursuant to PRC §21080.3.1, the Department of Resource Management contacted the Tribe to facilitate a project notification by certified mail to notify the Tribe that the project was under review and to provide the Tribe 30 days from the receipt of the letter to request consultation on the project in writing. The letter was sent on March 8, 2022 and the 30 days after receiving the request for consultation ended on April 13, 2022. To date, no response to the project notification has been received. A notice of the availability of this document and public hearing for the project has been sent to the Tribe.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

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

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

David Schlegel, AICP

Senior Planner

Date Date

Paul A. Hellman

Director of Resource Management

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A "No Impact" answer is adequately supported if all the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more, "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less-than-significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVIII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures: For effects that are "Less-than-significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. General Plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify the following:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less-than-significant.

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

- a) The project would not result in any adverse effect on a scenic vista. The proposed wind turbines are not tall enough as to be visible from any public vantage point and the aesthetic quality of the project as viewed from any other vantage point would not be significantly impacted because of the existing visual quality of the site which is characterized by the presence of the existing wireless telecommunications towers and exiting wind turbines on spur ridge and Hatchet Ridge.
- b) The project would not substantially damage any scenic resource. The project site is not visible from a designated scenic highway and no vegetation is proposed to be removed in order to construct the solar array and wind turbines. All other aspects of the project would be installed on or inside existing structures and buildings.
- c) The area adjacent to the existing wireless telecommunications facility where the wind turbines and solar array would be constructed is disturbed with no vegetation present. The wind turbines and solar array are consistent with the existing visual character and quality of the site. The spur ridge top on which the project is proposed has been cleared for the existing wireless telecommunications facilities and Hatchet Ridge Wind project which include towers, antennas, 328-foot-tall wind turbines, and various one-story buildings and ancillary structures. The proposed 35 feet tall wind turbines are substantially smaller in size than the existing 328 feet tall turbines and would not degrade the existing visual character or quality of the site and its surroundings.
- d) The project would include photovoltaic solar arrays that are intended to absorb light and minimize reflection or glare. The metal frame of the 93-foot-long by 27-foot-wide ground-mounted solar array and white paint on the proposed wind turbines may have some reflective properties but, based on the small scale of the proposed structures and the remote location, any light or glare attributable to the project that could adversely affect day or nighttime views in a non-urbanized area would be less-than-significant.

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

- a) The subject property is not identified as Prime Farmland, Unique Farmland, or Statewide Importance on the map titled Shasta County Important Farmland 2016.
- b) Neither this property nor the surrounding properties are zoned for agricultural use nor are they in a Williamson Act Contract.
- c) The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). The project site is located in a Timberland Production zone district. However, the proposal does not involve the conversion of timberland to another use and does not propose removal of any vegetation.
- d) The project would not result in the conversion of Farmland to non-agricultural use or loss of forest land or conversion of forest land to non-forest use. The existing site has an approved use permit for a wireless telecommunications facility and no expansion of the existing lease area is proposed. The area where construction would occur is already disturbed land and there are no agricultural or forest resources in the area nor is the site located in an area of significant agricultural soils.

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

- a) The project would not conflict with or obstruct implementation of the Northern Sacramento Valley Planning Area (NSVPA) 2018 Triennial Air Quality Attainment Plan for Northern Sacramento Valley Air Basin as adopted by Shasta County, or any other applicable air quality plan. The project would generate a nominal number of vehicle trips during construction and even less during operations. Unlike diesel fueled backup generators that typically provide backup power for wireless telecommunication facilities, the proposed battery storage for backup power would not involve any air emissions during its operation and would therefore not conflict with the 2018 Attainment Plan.
- b) The project would not result in a cumulatively considerable net increase of any criteria pollutant, including ozone, ozone precursors or PM10 (particulate matter), the pollutants for which the Northern Sacramento Valley Air Basin is in non-attainment under the applicable State ambient air quality standard. During construction the project would generate nominal volumes of air emission from dust and vehicle and construction equipment exhaust. The project would not emit any criteria pollutant whatsoever during its operation.
- c) No sensitive receptors have been identified adjacent to or near the project area and no substantial pollutant concentrations are anticipated as a result of the project.
- d) The project would not cause air emissions which would create objectionable odors affecting a substantial number of people. The project may generate negligible odorous emissions from exhaust fumes, sealants, or coatings use during construction and even less during operation and maintenance, but there is not a substantial number of people living or working in the vicinity of the project and odorous emissions from the project area likely to dissipate long before reaching any sensitive receptor.

IV. <u>BIOLOGICAL</u> F	RESOURCES: Would the project:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
modifications, or or special-status regulations, or by	tial effect, either directly or through habitat any species identified as a candidate, sensitive, species in local or regional plans, policies, or the California Department of Fish and Wildlife Wildlife Service?			√	
sensitive natural	al adverse effect on any riparian habitat or other community identified in local of regional plans, alations or by the California Department of Fish				✓

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

- a) The California Natural Diversity Database 2021 identifies the project site to be located within an area with potential to include *Calystegia Atripilicifolia* ssp. *Buttensis* (Butte County Morning Glory), which is identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service have been identified in the project area. However, the project would not involve removal of any vegetation or other significant habitat. The project was referred to the California Department of Fish & Wildlife (CDFW) for review of impacts to listed species and other biological impacts. Due to the fact that no vegetation removal is proposed CDFW had no comment on the project. Based on the *Permitting Small Wind Turbines Handbook*, 2003, the six wind turbines are of a height and size that has shown little to no evidence of having an impact on animals. The six (6) turbines are of a similar height and cumulative width of a typical two-story single-family home. Turbines of this size are not considered to have a significant impact to migratory or predatory birds. The photovoltaic array would stand 3 6 feet off the ground and would not impact any sensitive habitat. Any other impacts to animal species which might travel through the project area would not be considered to be significant.
- b-c) There is no riparian habitat or other sensitive natural community on the project site or in the project area. There are no wetlands on the project site or in the immediate vicinity. There are no vernal pools or wetlands identified on the subject property based on the Vernal Pools, Wetlands, and Waterways Map of Shasta County prepared by the Geographic Information Center, California State University, Chico, on August 24, 1996.
- d) The creeks and stream tributaries present within the project stie do not flow through the area within which construction is proposed. The project is not in the vicinity of a wildlife nursery site. Therefore, the project would not interfere with any native resident or migratory fish or wildlife species, nor impede the use of native wildlife nursery sites.
- e) The project would not conflict with any ordinances or policies which protect biological resources. Shasta County Board of Supervisors Resolution No. 95-157 provides guidance regarding use and protection of oak trees on a voluntary basis The project site is not an oak woodland and no removal of trees is proposed as part of project.
- f) The Hatchet Ridge Wind Project includes a mitigation monitoring program through the adopted EIR which focuses on impacts to migratory and predatory birds. The proposed project would not conflict with any of the mitigation monitoring which is occurring for the Hatchet Ridge Wind Project and there is no other habitat conservation plan or similar plan adopted for the project site or project area.

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

- a) The project would not cause a substantial adverse change in the significance of an historical resource. There are no known historical resources in any areas of the project site which is proposed to be utilized or developed upon nor in the immediate vicinity.
- b) The project would not cause a substantial adverse change in the significance of an archaeological resource (see discussion below).
- c) The project site is not on or adjacent to any known cemetery or burial area. Therefore, there is no evidence to suggest that the project would disturb any human remains.

The project scope was carefully considered for its potential to impact any archaeological resources and to determine whether additional screening for archaeological resources would be necessary. Previous archaeological reconnaissance has been completed for various projects in the vicinity and results of the locations of sacred sites for the Pit River Tribe were kept confidential in most cases. A request for consultation was sent to the Pit River Tribe to ensure that archaeological resources would not be adversely impacted pursuant to 15064.5. No consultation was requested. Ultimately, the project proposal is such that no additional areas outside of those that have been previously disturbed would be impacted by the project. Based on these facts, the proposed changes are not considered to cause a substantial change in the significance of an archaeological resource or disturb any human remains.

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

Mitigation/Monitoring: None proposed.

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

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

a) The project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The project proposes renewable energy to serve the site for ongoing and backup energy purposes – making the project site more energy efficient.

b) The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The project is consistent with State goals for increasing zero-emission energy.

Mitigation/Monitoring: None proposed.

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

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

- a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault;

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

ii) Strong seismic ground shaking;

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

All structures shall be constructed according to the seismic requirements of the currently adopted Building Code.

iii) Seismic-related ground failure, including liquefaction;

The extent of the construction involves footings for 6 wind turbines and a 93-foot-long by 27-foot-wide solar array would not cause a significant ground failure. Soils at the project site are not prone to liquefaction and are able to support standard and engineered structural footings for the wind turbines and solar array.

iv) Landslides.

The project is on a level area of a ridge top and the soil type is not listed as being prone to landslide. Furthermore, the project does not propose any new development or construction that would cause potential substantial adverse effects.

- b) The project would not result in substantial soil erosion or the loss of topsoil. The amount of earth material to be moved is not likely to require a grading permit since the area is already clear of vegetation and is relatively flat. With minimal grading and erosion control being included in the provisions of any building there would not be loss of topsoil or substantial erosion.
- c) The project is located on the Obie-Mounthat complex soil type with 5-15 percent slopes. This soil type is well-drained and would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The topography of the site is predominantly level, with small undulations. The threat of landslides, lateral spreading, subsidence, liquefaction, or collapse is insignificant as the geology of the area demonstrates great stability.
- d) The project would not be located on expansive soil creating substantial direct or indirect risks to life or property. The site soils are not described as expansive soils in the "Soil Survey of Shasta County."
- e) The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems were onsite wastewater to be proposed in the future.
- f) The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There is no paleontological resource or unique geologic feature on the project site.

Mitigation/Monitoring: None proposed.

VIII. GI	REENHOUSE GAS EMISSIONS: Would the project:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
	enerate greenhouse gas emissions, either directly or indirectly, at may have a significant impact on the environment?				>
b) Con the	onflict with an applicable plan, policy or regulation adopted for e purpose of reducing the emissions of greenhouse gases?				√

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

a, b) In 2005, the Governor of California signed Executive Order S-3-05, establishing that it is the State of California's goal to reduce statewide greenhouse gas (GHG) emission levels. Subsequently, in 2006, the California State Legislature adopted Assembly Bill AB 32, the California Global Warming Solutions Act. In part, AB 32 requires the California Air Resources Board to develop and adopt regulations to achieve a reduction in the State's GHG emissions to year 1990 levels by year 2020.

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

The City of Redding currently utilizes a quantitative non-zero project-specific threshold based on a methodology recommended by the California Air Pollution Officers Association (CAPCOA) and accepted by the California Air Resources Board. According to CAPCOA's Threshold 2.3, CARB Reporting Threshold, 10,000 metric tons of carbon-dioxide equivalents per year (mtC02eq/yr) is recommended as a quantitative non-zero threshold. This threshold would be the operational equivalent of 550 dwelling units, 400,000 square feet of

office use, 120,000 square feet of retail, or 70,000 square feet of supermarket use. This approach is estimated to capture over half the future residential and commercial development projects in the State of California and is designed to support the goals of AB 32 and not hinder it. The use of this quantitative non-zero project-specific threshold by Shasta County, as lead agency, would be consistent with certain practices of other lead agencies in the County and throughout the State of California.

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

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

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

The project would generate negligible amounts of greenhouse gas during construction and operations, primarily from the use of vehicles during construction and maintenance. The project proposes no new ongoing emissions as the energy used to provide backup power is emission-free. The zero-emission energy is also likely serving as a replacement for existing power to the project site, some percentage of which come from electricity sources which emit GHGs. The project would not have an impact on GHG emissions based on the proposal to provide 100% renewable power for the site, both during regular consumption and in through battery storage.

Mitigation/Monitoring: None proposed.

IX.	HAZARDS AND HAZARDOUS MATERIALS: Would the ect:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				√
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				✓
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				√
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				>
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				√
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				√
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?			✓	

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

- a) The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Routine transportation, use or disposal of hazardous materials in not anticipated during construction and for maintenance during operation of the project. In the event that hazardous materials might be handled or stored on site in excess of certain thresholds, the project is conditioned to require that a Hazardous Materials Business Plan provided.
- b) The project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Lithium ion batteries are self-contained and would be installed subject to all Fire and Building Code requirements. The project proposes 11 small batteries on two battery racks. Based on the scale of the proposal and the location of the project site not being in close proximity to sensitive environmental resources and far from the public, any hazard to the environment or public under accident conditions would less-than-significant.
- c) The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The project site is not within one-quarter mile of a school. The nearest school is greater than 6 miles away.
- d) The project site is not included on the list of hazardous materials sites compiled by the California Department of Toxic Substances Control. There is no historical evidence of any commercial activity on the site that would have used hazardous materials.
- e) The project is not located within an airport land use plan or within two miles of a public airport or public use airport.
- f) A review of the project and the Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan indicates that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project proposal does not obstruct ingress or egress routes nor does it propose any aspects that could impair emergency response.
- g) The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The proposal would not increase the number of people on the project site and is proposed to be developed in an unvegetated location. The project intends to allow for the wireless telecommunication facility to remain in operation at times where power can be shut off or out due to events such as a wildland fire.

Mitigation/Monitoring: None proposed.

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

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the Initial Study – Amendment 22-0003 – Vertical Bridge REIT, LLC 14

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

- a) The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Through adherence to construction standards, including erosion and sediment control measures, water quality and waste discharge standards will not be violated. Nor would surface or ground water quality be otherwise substantially degraded. The Grading needed for this project is very minimal due to the fact that the existing ground is flat and does not contain any vegetation. A building permit will be required and provisions of the permit will address erosion and siltation containment on- and off-site.
- b) The project would not substantially deplete decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Water is not currently provided for the site. A 5,000-gallon surface mounted storage tank would be installed to provide fire protection water for the project. The tank would likely be and maintained by a water truck from an off-site source. However, if it were necessary to drill an on-site well to service the tank, it would not require a substantial amount of water to fill periodically and/or make-up for evaporation from the tank, therefore any impact on groundwater supplies would not be substantial.
- c) The project would not substantially alter the existing drainage pattern of the site or area, or add substantial impervious surface area, in a manner which would (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; and or (iv) impede or redirect flows.
 - The drainage pattern will not be altered. The increased impervious surface from the solar arrays over top of the soil is not considered to be significant. Drainage will be dispersed to either the unimproved areas or existing vegetated areas adjacent to the solar array and buildings. The runoff will sheet flow into the existing drainage channels on the site. This will preserve the existing drainage pattern and not require alteration of the natural drainage courses.
- d) The project would not risk release of pollutants in flood hazard, tsunami, or seiche zones due to project inundation, The project would not conflict with or obstruct implementation of a water quality control plan or sustainable management plan. The areas to be constructed upon are not in the vicinity of a flood plain or at risk of inundation.
- e) The project was referred to the California Regional Water Quality Control Board. No comments were received. The project proposal is not significant enough in size nor its location to cause a conflict with or obstruct any water quality control plan for the area.

Mitigation/Monitoring: None proposed.

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

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

- a) The project would not physically divide an established community. The project is not located in any established community.
- b) The project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

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

- a) The project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. A review of the Minerals Element of the Shasta County General Plan resulted in no known mineral resources of regional value located on or near the project site.
- b) The project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The project site is not identified in the General Plan Minerals Element as containing a locally-important mineral resource. There is no other land use plan which addresses minerals.

Mitigation/Monitoring: None proposed.

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

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

a) The project includes inverters which are equipped with cooling fans that would generate some temporary or permanent increases in ambient noises. However, due to the fact that these features are proposed to be located within a building, the noise from the equipment would not exceed standards established in the General Plan.

The General Plan Noise Standard is 55 decibels (dB) hourly L_{eq} daytime, and 50 dB hourly L_{eq} nighttime. The inverters would generate 51 dB(A) from 3 meters away and would be located within the existing building. Noise levels would be reduced to less than the levels identified in the General Plan Noise.

The project will result in temporary and periodic increases in ambient noise levels in the existing building but that impact would not extend to the project vicinity. This is not considered to be a significant impact. There will be increased noise levels during construction. However, none of these increases are expected to be significant and there are no sensitive noise receptors in the project vicinity.

b) The project would not result in generation of excessive groundborne vibration or groundborne noise levels. The wind turbines and solar array along with the associated utility infrastructure causes very low vibrations and are typically undetectable without the use

of electric meters or other similar tools. Any vibrations from the inverters or cooling fans would also be located within the existing unmanned building and would therefore cause no impact.

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

Mitigation/Monitoring: None proposed.

XIV	7. POPULATION AND HOUSING: Would the project:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				>
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				√

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

- a) The project would not induce substantial unplanned population growth in an area, either directly or indirectly. The project does not include the development of new homes or businesses, nor does it include the extension of any permanent roads or other infrastructure. Therefore, it is not expected to induce substantial growth in the area.
- b) The project would not displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere. The project does not include destruction of any existing housing.

Mitigation/Monitoring: None proposed.

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

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

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

Fire Protection:

The project is located in a "VERY HIGH" fire hazard severity zone. However, no significant additional level of fire protection is necessary. The facility is unmanned and the backup generator is servicing the existing telecommunications tower.

Police Protection:

The County employs a total of 165 sworn and 69 non-sworn County peace officers (Sheriff's deputies) to serve a population of 66,850 persons that reside in the unincorporated area of the County (United States Census Bureau April 1, 2020). This level of staffing equates to a ratio of approximately one officer per 286 persons. The project will not result in additional residences or uses that would significantly increase the need of police protection and the project would not warrant any additional Sheriff's deputies.

Schools:

The resultant development from the project would not involve any new floor area which would have an impact on schools.

Parks:

The County does not have a neighborhood parks system.

Other public facilities:

Mitigation/Monitoring: None proposed.

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

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

- a) The project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The County does not have a neighborhood or regional parks system or other recreational facilities and the project would not cause an increase in use of any such facilities either.
- b) The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The project does not propose new housing or significant numbers of new employment in the area.

Mitigation/Monitoring: None proposed.

XV	II. TRANSPORTATION: Would the project:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				√
b)	Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?			✓	
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				√
d)	Result in inadequate emergency access?				√

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

- a) The project would not conflict with a program, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project proposes little to no change in vehicle trips per day since the equipment at the unmanned facility is and would currently be maintained regularly.
- b) CEQA Guidelines Section 15064.3 subdivision (b) requires that lead agencies consider whether a project would increase vehicle miles traveled (VMT) to the extent that impacts on the environment, primarily from vehicle emissions, would result. Based on the Office of Planning and Research's (OPR) technical advisory regarding VMT analysis, only vehicle trips for light-duty vehicles shall be considered in VMT analysis. The project would increase light-duty vehicle trips only during construction of the project and would not increase any light-duty vehicle trips to and from the project site on an ongoing basis as maintenance would follow the regular maintenance schedule that serves the existing facility. Vehicle trips during the construction period would not be substantial in number.
- c) The project would not substantially increase hazards due to a geometric design feature or incompatible uses. All existing vehicle access roads are intended to remain.
- d) The project would not result in inadequate emergency access. The project has been reviewed by the Shasta County Fire Department which has determined that there is adequate emergency access.

Mitigation/Monitoring: None proposed.

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

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

a) The project site has been developed and the area where improvements are proposed has previously been disturbed by construction and vehicular access and for fuel break for the site. While the general area is considered to have Tribal cultural significance, no sacred sites have been identified in the area where development is proposed. A request for consultation was made for the project with the Pit River Tribe and no response was provided. There is no evidence of historical resources at the site that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources; or a resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. Due to these facts,, any impacts to tribal cultural resources are considered to be less-than-significant.

XIX proj	K. <u>UTILITIES AND SERVICE SYSTEMS</u> : Would the ect:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects?				√
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				√
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				√
e)	Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				√

- a) The project would not require or result in the relocation or construction of new or expanded water or, wastewater treatment facilities or expansion of existing storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects. The project is not and will not be serviced with water or wastewater treatment systems.
- b) The project is not currently serviced with water and would require that a 5,000-gallon water storage tank be added to the site to supply fire protection water. The tank would be filled initially, maintained to off-set evaporation from the tank, and, if necessary, filled if drained. The facility is unmanned, and additional water would not be needed unless an emergency were to take place; in which case, a quantity of 5,000 gallons is considered to be less-than-significant
- c) The project proposes no liquid waste and is not currently provided with any onsite wastewater treatment system. The facility is unmanned.
- d) The project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The project would is intended to be unmanned with maintenance on equipment occurring with regularity and as needed. Because no employees are expected to remain at the site after conducting maintenance, the project's solid waste disposal needs are not significant, and the West Central Landfill has sufficient capacity to accommodate the continued use of the site and is in compliance with Federal, State, and local statutes and regulations related to solid waste.
- e) The project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste. The unmanned facility is not anticipated to generate any solid waste with any regularity.

lan	A. WILDFIRE: If located in or near state responsibility areas or ds classified as very high fire hazard severity zones, would the ject:	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?				√

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

- a) The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The proposed backup power is intended to maintain power for the site and maintain operation of the site in the event that wildfire would cause power to go out or be shut off. Rather than impair an adopted emergency response plan or emergency evacuation plan, the project would enhance implementation of those plans by ensuring communication services remain in operation.
- b) The project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project site is located on relatively flat land with enough distance from sloped areas to maintain defensible space and would not include permanent project occupants whom could be exposed to risk from wildfire. Maintenance of the project site is expected to be intermittent.
- c) The project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The project proposes to utilize existing roads, fuel breaks and other utilities and the additional infrastructure associated with the wind turbines, solar array and batteries would be subject to all Fire and Building Code construction requirements and are not considered to cause any significant increase in fire risks either temporarily or permanently.
- d) The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The project is not considered to be one that would exacerbate fire risks due to its size, scale and location.

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

XIX. MANDATORY FINDINGS OF SIGNIFICANCE:	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporated	Less-Than- Significant Impact	No Impact
future projects)?				
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				√

- a) Based on the discussion and findings in Section IV. Biological Resources, there is no evidence to support a finding that the project would have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below the self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal.
 - Based on the discussion and findings in Section V. Cultural Resources, there is no evidence to support a finding that the project would have the potential to eliminate important examples of the major periods of California history or prehistory.
- b) Based on the discussion and findings in all Sections above, there is no evidence to suggest that the project would have impacts that are cumulatively considerable.
- c) Based on the discussion and findings in all Sections above, there is no evidence to support a finding that the project would have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

INITIAL STUDY COMMENTS

PROJECT NUMBER Amendment 22-0003 to amend Use Permit 166-84 – Vertical Bridge REIT, LLC

GENERAL COMMENTS:

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

1. N/A

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

1. N/A

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

SOURCES OF DOCUMENTATION FOR INITIAL STUDY CHECKLIST

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

GENERAL PLAN AND ZONING

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

ENVIRONMENTAL IMPACTS

I. AESTHETICS

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

II. AGRICULTURAL AND FORESTRY RESOURCES

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

III. AIR QUALITY

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

IV. BIOLOGICAL RESOURCES

- 1. Shasta County General Plan, Section 6.2 Timberlands, and Section 6.7 Fish and Wildlife Habitat.
- 2. Designated Endangered, Threatened, or Rare Plants and Candidates with Official Listing Dates, published by the California Department of Fish and Wildlife.
- 3. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.
- 4. Federal Listing of Rare and Endangered Species.
- 5. Shasta County General Plan, Section 6.7 Fish and Wildlife Habitat.
- 6. State and Federal List of Endangered and Threatened Animals of California, published by the California Department of Fish and Wildlife.
- 7. Permitting Small Wind Turbines: A Handbook, September 2003

V. CULTURAL RESOURCES

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

VI. ENERGY

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

VII. GEOLOGY AND SOILS

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

VIII. GREENHOUSE GAS EMISSIONS

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

IX. HAZARDS AND HAZARDOUS MATERIALS

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

X. HYDROLOGY AND WATER QUALITY

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

XI. LAND USE AND PLANNING

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

XII. MINERAL RESOURCES

3. Shasta County General Plan Section 6.3 Minerals.

XIII. NOISE

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

XIV. POPULATION AND HOUSING

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

XV. PUBLIC SERVICES

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

XVI. RECREATION

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

XVII. TRANSPORTATION/TRAFFIC

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

XVIII. TRIBAL CULTURAL RESOURCES

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

XIX. UTILITIES AND SERVICE SYSTEMS

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

XX. WILDFIRE

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

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

None



















