

Section I	Description Of Project.
DATE: November 5, 2026 CASE#: U_2017-0034 DATE FILED: 12/22/2017 OWNER: LORDS LAND MINISTRIES APPLICANT: T-MOBILE USA, INC PROJECT COORDINATOR: ROB FITZSIMMONS REQUEST: Coastal Development Use Permit Modification to authorize an Eligible Facilities Request to extend an existing monopine wireless tower by 20 feet. Additions to the tower will include six new antennas, six new radios, two new cables, one new collar mount and three new antenna section mounts. New ground equipment additions include a new concrete equipment pad, ice bridge, H frame with one new ciena, a new telco box, a new 200 AMP PPC cabinet, a new GPS antenna, a new 200 ANP meter, a new equipment cabinet, a new battery and a new cable. All development proposed under this request will be located within the existing fenced equipment enclosure. ENVIRONMENTAL DETERMINATION: Mitigated Negative Declaration LOCATION: In the Coastal Zone, 4± miles southeast of the town of Albion, on the north side of Navarro Ridge Road (CR 518), 3± miles east of its intersection with Highway 1, at 30660 Navarro Ridge Road, Albion (APN: 126-230-33).	
Section II	Environmental Checklist.
<i>"Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change, may be considered in determining whether the physical change is significant (CEQA Guidelines, Section 15382).</i> <i>Accompanying this form is a list of discussion statements for <u>all</u> questions, or categories of questions, on the Environmental Checklist (See Section III). This includes explanations of "no" responses.</i>	

1. INTRODUCTION

As Lead Agency, the County of Mendocino prepared a Mitigated Negative Declaration (herein referred to as the "2019 MND") for U_2017-0034, a Coastal Development Use Permit to authorize construction and operation of a wireless communication facility at 30660 Navarro Ridge Road, Albion (APN: 126-230-33). On May 16, 2019, the County of Mendocino Planning Commission adopted the 2019 MND (Resolution No. PC_2019-0007) and approved the Conditional Use Permit. This MND and Permit established a maximum height for the tower, inclusive of equipment and faux branches, of 135 feet.

The applicant has requested to amend the Coastal Development Use Permit to install additional equipment, resulting in a colocation of T-Mobile equipment on the AT&T tower. This involves expanding the tower's height beyond the 2019 limit. Although this defeats a mitigation measure deemed necessary in the 2019 MND, it is an accommodation required by current Federal statute, as the amendment qualifies as an "eligible facilities request." This Subsequent Mitigated Negative Declaration (MND) has been prepared to determine whether the proposed expansion will result in new or significant environmental impacts under the meaning of CEQA when compared with the potential impacts analyzed in the 2019 MND. This analysis factors in impact areas and discusses questions not considered in the 2019 MND but now considered standard for CEQA analyses per the 2025 CEQA Guidelines Appendix G. It also factors in new information, including the fact that since 2019 CalFire has reclassified the project site from High Fire Hazard to Moderate.

According to the Mendocino County Code (MCC) Section 20.536.025(D), an amendment to a permit such as U_2017-0034 involving a material change, as this request does, shall be referred to the approving authority having original jurisdiction over the coastal development permit – in this case, the Planning Commission. However, local discretionary review is limited in this case by the Federal Spectrum Act. Pursuant to 47 CFR § 1.6100, the County must approve projects that qualify as "eligible facilities requests," as this project does. Local jurisdictions retain the ability to place conditions on such approvals, but only within certain limitations. Capping the tower height to the maximum established in the 2019 MND is no longer something the County has the ability to do.

2. STATUTORY BACKGROUND

In accordance with the California Environmental Quality Act (CEQA), when a Lead Agency considers further discretionary approval on a previously approved project, the Lead Agency is required to consider if the previously certified CEQA document provides an adequate basis for rendering a decision on the proposed discretionary action.

In summary, when making such a decision, the Lead Agency must consider any changes to the project or its circumstances that have occurred and any new information that has become available since the project's CEQA document was certified.

In accordance with State CEQA Guidelines Sections 15162–15164, prior to approving further discretionary action, and depending on the situation, the Lead Agency must either: (1) prepare a Subsequent EIR; (2) prepare a Supplemental EIR; (3) prepare a Subsequent Negative Declaration; or (4) prepare an Addendum to the EIR or Negative Declaration. More specifically, Cal. Code Regs. Tit. 14, § 15162 states:

(a) When an EIR has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

(1) Substantial changes are proposed in the project which will require major revision of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

(c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.

(d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

The County prepared a Mitigated Negative Declaration for the original iteration of the project, adopting it on May 16, 2019 (the 2019 MND). It was not filed with the State Clearinghouse - at the time, this was not required of MNDs prepared by local agencies. A copy of the original MND is available upon request from the Mendocino County Department of Planning and Building Services, under the permit number U_2017-0034, and will also be made available on the Department's website as part of the review packet for UM_2025-0003 for the duration of the legally-required public review period.

Changes have been proposed to the project which conflict with mitigation measures deemed necessary to mitigate the Aesthetic Impacts of the project as originally approved in 2019, and Federal law has rendered these mitigation measures unenforceable and thus infeasible. These changes also require a new discretionary approval by the County of Mendocino. As discussed below, none of the conditions described in § 15162 calling for preparation of

subsequent Environmental Impact Report review have occurred. This Subsequent MND, prepared pursuant to § 15162(c), supports the conclusion that despite conflicting with the mitigations prescribed in the 2019 MND, the proposed project modifications are minor and do not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

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.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" as indicated by the checklist on the following pages.

- | | | |
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| ☐ Aesthetics | ☐ Ag and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards/Hazardous Materials |
| ☐ 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

An explanation for all checklist responses is included, and all answers take into account 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. The explanation of each issue identifies (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. In the checklist the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

"Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the Project, or clearly will not impact nor be impacted by the Project.

INITIAL STUDY/ENVIRONMENTAL REVIEW: This section assesses the potential environmental impacts which may result from the project. Questions in the Initial Study Checklist are stated and answers are provided based on analysis undertaken.

<u>I. AESTHETICS.</u> 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 nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public	☐	☒	☐	☐

<u>I. AESTHETICS.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
views are those that are experienced from 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) Discussion: The site is not designated as a scenic vista and due to the fact that the site is already a developed parcel and most of the parcel is not visible from public vantage points there will be no impact on any scenic vistas as a result of the project.
- b) Discussion: State Route 1, which is the nearest State Highway to the project location, is not designated as a state scenic highway. Scenic resources such as trees and rock outcroppings will not be damaged as a result of the project given that the site is already developed and proposed new development will not require tree removal. Therefore, there will be no impact on scenic resources as a result of the project.
- c) Discussion: The project's potential to substantially degrade the existing visual character or quality of the site and its surroundings is limited by the fact that the parcel is already developed and the proposed new development will not be visible from public vantage points. Additionally, the proposed wireless communications facility will be a stealth facility that will have the appearance of a pine tree. The location is surrounded by foliage which will naturally stealth the facility from the public right-of-way. With the imposition of mitigation measures, the project's impact on aesthetics will be reduced to a less than significant level.

The 2019 MND for the original iteration of the project included Mitigation Measures to address this impact area, but did so in an unorthodox way, where the Initial Study/MND itself only stated "Several mitigation measures are recommended¹ to ensure that the facility is constructed in a manner consistent with Mendocino County Code requirements for the protection of visual resources within the coastal zone." The actual Mitigation Measures were not included in the 2019 MND itself, but instead were included in the Resolution approving the project and establishing the Conditions of Approval. These Mitigation Measures were as follows:

- The total height of tower including antennas and faux branches shall not exceed 135 feet in height above ground level. Within sixty (60) days of completion of the installation of the facility, the applicant shall confirm that the height is no greater than approved, and shall submit a written certification to the County of the actual height.*
- No trees that provide visual screening of the communications facility shall be removed after project completion except to comply with fire safety regulations or to eliminate safety hazards. Tree trimming shall be limited to the minimum necessary for operation of the facility. Any future tree removal at the site shall require either a Coastal Development Permit or modification to this permit to ensure that local policies and ordinances are adhered to.*
- If use of any portion of the proposed facility is discontinued for more than one year, all parts of the facility not in use, above grade, shall be completely removed from the site, and the site shall be restored to a natural-appearing condition.*
- Prior to issuance of a building permit, the applicant shall provide an irrevocable letter of credit, bond, certificate of deposit, or other reasonable form of security satisfactory to County Counsel, sufficient to*

¹ The reference to the mitigation measures being *recommended* rather than *required* is understood to be a clerical error. Upon certifying the 2019 MND, the County found all referenced mitigation measures were necessary to mitigate the Aesthetic impacts to a less than significant level and so made them Conditions of Approval of the initial version of the project.

fund the removal of the facility and restoration of the site in the event that the applicant abandons operations or fails to comply with requirements for removal of facilities and restoration of the site.

5. *Exterior surfaces of structures and equipment shall have subdued colors and non-reflective materials selected to blend with their surroundings. Color samples shall be submitted to the Department of Planning and Building for approval.*
6. *The antenna array and faux tree branches shall not extend greater than the 13-foot diameter ring around the center of the monopine unless an amendment to this permit or a new Use Permit is granted for such an expansion.*
7. *An evaluation of the facility's stealth capability shall be submitted for review and approval by the Department of Planning and Building Services after the initial construction, one year following construction and every five years thereafter. The report shall assess surrounding vegetation growth, including height and density in the vicinity, and a color assessment to assess fading of material. Replacement or remediation of the wireless facility shall be performed by the applicant if required by the Department of Planning and Building Services.*
8. *Branches of the "monopine" shall extend beyond the antennas and fully conceal the supporting structure and antennas. The branches must:*
 - a. *Be constructed to a density of 2.5 branches for each one vertical foot of pole, and*
 - b. *Start attachment at no greater than twenty-five (25) feet above finished grade and continue to the top of the pole, and*
 - c. *Be a minimum of eight (8) feet long around the circumference of the lower level and shall taper appropriately as the branches progress upwards.*

The County does not have an established threshold of significance for the Aesthetic impacts of cell towers, so determinations of significant impacts and adequate mitigations are based solely on the facts of the case available at the time.

The modified project involves increasing the height of the tower as originally constructed by 20 feet, a direct conflict with Measure 1. Measure 1 may have been enforceable at the time it was imposed, but is no longer pursuant to Federal law. Pursuant to 47 CFR § 1.6100, local jurisdictions must approve collocations of new transmission equipment on existing towers even if they involve an increase in height of up to increase of 20 feet plus the height of an additional array, or up to 10% of the height of the base tower, whichever is higher.

Given that expansion of the tower's height within these bounds is not something the Lead Agency has denial authority over, the height of the tower in and of itself cannot be made a threshold of significance for determining environmental impacts under CEQA.

LIDAR analysis of the site did not show that the surrounding tree canopy height has grown significantly since the initial iteration of the project was approved in 2019. The current "monopine" stealthing method, disguising the antenna as a tree, appears to adequately mitigate the potential aesthetic impact to a less than significant level, and there is no reason to presume that it will cease to be adequate once the tower is extended to the statutorily-allowable height, provided the faux branches are extended congruently.

It does not seem that the ongoing submittal and PBS review of periodic site stealth capability reports required by Mitigation Measure 7 have occurred. However, PBS Staff viewed the site from the County Right of Way on August 8, 2025 and determined the level of stealthing at the time was adequate.

Upon review, and in light of the limitations imposed on local review of Eligible Facilities Requests by Federal statute, the Lead Agency has determined the following Mitigation Measures, numbered AES-1 through AES-6, are necessary and adequate to reduce the Aesthetic Impacts of the project to a less than significant level. References to procedural requirements included in the 2019 MND's Mitigation Measures were simply

clarifying points and do not have a clear mitigating effect, so these references removed. Measure 6 of the 2019 MND only served to clarify a procedural requirement, so it has been removed entirely.

- AES-1.** No trees that provide visual screening of the communications facility shall be removed after project completion except to comply with fire safety regulations or to eliminate safety hazards. Tree trimming shall be limited to the minimum necessary for operation of the facility.
- AES-2.** If use of any portion of the proposed facility is discontinued for more than one year, all parts of the facility not in use, above grade, shall be completely removed from the site, and the site shall be restored to a natural-appearing condition.
- AES-3.** Prior to issuance of a building permit, the applicant shall provide an irrevocable letter of credit, bond, certificate of deposit, or other reasonable form of security satisfactory to County Counsel, sufficient to fund the removal of the facility and restoration of the site in the event that the applicant abandons operations or fails to comply with requirements for removal of facilities and restoration of the site.
- AES-4.** Exterior surfaces of structures and equipment shall have subdued colors and non-reflective materials selected to blend with their surroundings. Color samples shall be submitted to the Department of Planning and Building for approval.
- AES-5.** An evaluation of the facility's stealth capability shall be submitted for review and approval by the Department of Planning and Building Services after the initial construction, one year following construction and every five years thereafter. The report shall assess surrounding vegetation growth, including height and density in the vicinity, and a color assessment to assess fading of material. Replacement or remediation of the wireless facility shall be performed by the applicant if required by the Department of Planning and Building Services.
- AES-6.** Branches of the "monopine" shall extend beyond the antennas and fully conceal the supporting structure and antennas. The branches must:
- Be constructed to a density of 2.5 branches for each one vertical foot of pole, and
 - Start attachment at no greater than twenty-five (25) feet above finished grade and continue to the top of the pole, and
 - Be a minimum of eight (8) feet long around the circumference of the lower level and shall taper appropriately as the branches progress upwards.
- d) Discussion: Two lights are proposed for the wireless communications facility. The proposed lights are shielded down tilt lights with motion sensors and automatic shutoff timer located on the walk-in equipment cabinet. The proposed two additional lights will not cause a substantial amount of new light or glare that will affect nighttime views in the area. Therefore, impacts will be less than significant.

<u>II. AGRICULTURE AND FORESTRY RESOURCES.</u> 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

<u>II. AGRICULTURE AND FORESTRY RESOURCES.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Discussion: The proposed project will take place on land that is not designated as Prime or Unique Farmland. The site is designated as Grazing Land (G) and Rural Residential and Rural Commercial (R), as shown on the Important Farmland Map in the attachments to the Staff Report for this case. The project site is already developed with existing residential and recreational/retreat use and the proposed development is located within the already developed area of the parcel. Therefore, there will be no impact on Prime, Unique or Farmland of Statewide Importance as a result of the project.
- b) Discussion: The site is zoned Remote Residential, Forest Land and Timber Production. There are Williamson Act contracted lands adjacent to the project site on the western parcel boundary, furthest away from the proposed development. The proposed project will not conflict with any existing zoning or policies protecting agricultural resources. Therefore, there will be no impact as a result of the project.
- c) – d) Discussion: The site is zoned Remote Residential, Forest Land and Timber Production. The proposed development is located entirely within the Remote Residential zoning district. Timber Production Zones are located adjacent to the parcel boundaries but the proposed project will not encroach upon these designated resource areas. Therefore, there will be no impact.
- e) Discussion: As noted in the above answers to a) through d) the project will not result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use. The site has an existing residential and recreational/retreat use, is zoned Remote Residential and this application will not encroach upon any resource designated lands.

<u>III. AIR QUALITY.</u> 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 any 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?	☐	☐	☐	☒
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- a) Discussion: No component of the project will conflict with or obstruct implementation of any existing air quality plan. Additionally, Conditions of approval are recommended that will ensure that the project will achieve compliance with Mendocino County Air Quality Management District (AQMD) standards.
- b) Discussion: The AQMD is in attainment for all State standards with the exception of particulate matter less than 10 microns in size (PM10). The most common source of PM10 is wood smoke from home heating or brush fires, and dust generated by vehicles traveling over unpaved roads. A PM10 attainment plan was finalized in 2005 that provides regulations for construction and grading activities and unpaved roads. The proposed project has the potential to increase PM10 in the immediate vicinity of the site during access road construction. The proposed construction of internal access roads, if constructed in conformance with the conditions of approval, is not expected to contribute substantially to PM10 levels such that a significant impact would result. Local impacts to the area during construction would be less than significant using standard dust control measures. Conditions of Approval are recommended that will ensure that the project will achieve compliance with AQMD standards.
- c) – d) Discussion: Sensitive receptors can include schools, parks, playgrounds, day care centers, nursing homes, hospitals, and residential dwellings. The project is located within a primarily low density residential area. The project will not result in substantial pollutant concentrations and will not generate objectionable odors that would affect a substantial number of people.

<u>IV. BIOLOGICAL RESOURCES.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial 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 Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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?	☐	☐	☐	☒
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- a) Discussion: The proposed project will not 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 Wildlife or U.S. Fish and Wildlife Service as none have been identified on the parcel. The subject application was referred to both agencies but no comments were received from either agency.
- b) Discussion: There is no riparian habitat or other sensitive natural community identified on the parcel; therefore there will be no substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. The subject application was referred to both agencies but no comments were received from either agency.
- c) Discussion: There are no wetlands located on the parcel; therefore, there will be no impact.
- d) Discussion: The proposed project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species as the site is already developed with the existing use and the proposed application proposes limited new development in disturbed areas. No wildlife species of concern have been identified within the project area. Therefore, there will be no impact.
- e) Discussion: The proposed project does not conflict with any local policies or ordinances protecting biological resources or tree preservation policies. The project requires no tree removal; any future tree removal at the site will require a Coastal Development Permit or modification to this permit to ensure that local policies and ordinances are adhered to.
- f) Discussion: The proposed project will not conflict with any adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved habitat conservation plan as there are none that exist that would be applicable to the resources identified on the project site. Therefore, there will be no impact.

<u>V. CULTURAL RESOURCES.</u> 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) – b) Discussion: The Mendocino County Archaeological Commission accepted the submitted Revised Cultural Resources Investigation prepared by Archaeological Resources Technology dated November 25, 2018 at its February 13, 2019 meeting and recommended that only the standard discovery clause condition be applied to the proposed project as no sites were identified in the Investigation. The proposed modifications to the project site involve no new ground disturbance and so do not necessitate further archeological review. A Standard Condition advises the property owner of the Discovery Clause, which prescribes the procedures subsequent to the discovery of any cultural resources during construction of the project.
- c) Discussion: The proposed project will not disturb any known human remains as no remains or cemeteries have been documented on the project site. Therefore, there will be no impact.

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

a) Discussion: The project will rely on grid power, and will only use backup diesel generator power in emergencies, to ensure wireless service remains online during interruptions in grid power. No evidence has been provided to suggest that project construction will occur in an unnecessary or inefficient way. Less than Significant Impact.

b) Discussion: The project would not conflict with or obstruct any existing State plan for renewable energy or energy efficiency. There is no such plan currently at the local level. No Impact.

<u>VII. GEOLOGY AND SOILS.</u> 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 Publication 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 Section 1803.5.3 of the California Building Code (2022), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water 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?	☐	☐	☐	☒

- a) Discussion: Mendocino County Coastal Element Chapter 3.4 titled Hazards Management, addresses seismic, geologic, and natural forces within the Coastal Zone. Mapping does not associate the following with the subject site: faults, bluffs, landslides, or erosion. The property neither lies within, nor does it adjoin a mapped Alquist-Priolo Earthquake Fault Zone. The San Andreas fault is located approximately 10 miles west of the project site and is the nearest active fault. The site is designated on the Mendocino County Local Coastal Program Land Capabilities and Natural Hazards Map as having potential intermediate shaking levels in terms of seismicity. This project does not conflict with any state or local seismic hazard policy or plan.
- b) Discussion: Potential development impacts will be kept to a minimum with the uniform application of standard construction site erosion control requirements recommended in the conditions of approval, and those regulations found in MCC Chapter 16.30 Stormwater Runoff Pollution Prevention Procedure. Additionally, conditions of approval are recommended to ensure that disturbed areas are re-seeded after disturbance to reduce potential soil loss.
- c) Discussion: The soils present on the property do not comprise of soils that are unstable or would become unstable and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse as a result of the project. The site is not designated as an area with potential for liquefaction and is not located on an active fault.
- d) Discussion: The proposed site does not contain soils meeting the criteria of expansive soils as defined in Section 1803.5.3 of the California Building Code (2022). Therefore, there will be no impact as a result of the project.
- e) Discussion: The site contains an existing septic system that has been determined by the Mendocino County Division of Environmental Health to be adequate to serve the existing development and the proposed development of a wireless communications facility will not require any additional sewage disposal. Therefore, the soils at the site are capable of supporting on-site sewage disposal.
- f) Discussion: There are no known unique paleontological resources or sites or unique geologic features at the project site. No Impact.

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

- a) Discussion: The primary source of potential greenhouse gas emissions from the project is the back-up generator that is proposed, which will only be turned on in case of power outage or emergency situations. These potential emissions are not considered significant.
- b) Discussion: There is no applicable plan or policy that this project will conflict with as the project will not result in a significant increase in greenhouse gas emissions given that there is minimal additional development proposed. The primary source of potential greenhouse gas emissions from the project is the back-up generator that is proposed, which will only be turned on in case of power outage or emergency situations.

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

- a) Discussion: The applicant is proposing to install a 15-kilowatt generator, to be used solely for providing emergency power during periods of energy transmission interruption and for routine testing along with a 54-gallon diesel storage tank. Fuel trucks will need to access the site to refuel diesel and the number of trips will depend on the number and length of primary line power outages. The periodic transport of diesel fuel to the site is not expected to create a significant hazard to the public or the environment.
- b) Discussion: Materials such as oil and diesel fuel used for the generator are subject to a Hazardous Materials Management Plan (HMMP) as approved by the County Department of Public Health, Environmental Health Division (DEH). The plan identifies actions to be taken should a fuel or oil spill occur on site, including cleanup methods and appropriate agencies to contact in an emergency situation. Utilization of a generator as a back-up power source for wireless telecommunication facilities is common and staff is unaware of any fuel spill associated with any existing facilities in the County. An HMMP may not be required for this site given the small amount of fuel storage proposed; however, staff has included a condition of approval to ensure that one is prepared if it is in fact required by DEH. No mitigation required.
- c) Discussion: The proposed project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Additionally, the site is located approximately 4 miles south of the town of Albion, which is the location of the nearest school. Therefore, there will be no impact as a result of the project.
- d) Discussion: The project site is not listed as a hazardous materials site on any list compiled pursuant to Government Code Section 65962.5; therefore, there will be no impact as a result of the project.

- e) Discussion: The project site is not located within an airport zone and there are no airports within close proximity; therefore, there will be no impact to safety for people residing or working in the project area.
- f) – g) Discussion: The proposed project will not impair the implementation nor physically interfere with an adopted emergency response plan or emergency evacuation plan. The parcel is located in an area classified with a "Moderate Fire Hazard" severity rating. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (CalFire) and the Albion Little River Fire District for structural protection. The project application was referred to the CalFire for input. CalFire responded stating that the applicant is required to adhere to 4290 Regulations (CalFire #532-17). Albion Little River Fire District did not provide any comments on the project. The modified project was re-referred to both agencies; no additional comments were received. A Condition of Approval is recommended to ensure compliance with recommendations provided by CalFire. The proposed development consists of a wireless communications tower and accessory equipment and will not cause the exposure of people or structures to a significant risk of loss, injury or death involving wildland fires than that existing at the site today.

X. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
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?	☐	☐	☒	☐
iv) impede or redirect flood 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 groundwater management plan?	☐	☐	☐	☒

- a) Discussion: The proposed project will not violate any water quality standards or waste discharge requirements. The project application was referred to pertinent agencies for comment and no response as received expressing concerns with violation of water quality or waste discharge requirements, or that the project would otherwise pose a threat to surface or groundwater quality. Therefore, there will be no impact as a result of the project.
- b) Discussion: The proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The site has existing water facilities and no concern was expressed by the Mendocino County Division of Environmental Health as to potential for interference or depletion of groundwater supplies.

- c) i-iv) Discussion: The proposed project will not substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation or flooding on- or off-site. The property is already host to existing development and the proposed grading activities will not alter existing drainage patterns. The proposed development will not substantially alter the existing drainage pattern of the site or area, no stream or river alteration will result from the project, nor will the project substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The proposed project will not 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. There are no existing or planned storm drainage systems that the proposed project would impact. Runoff from the site will not be significantly increased no be polluted as there is minimal additional areas of development proposed under the project. The proposed project would not result in any degradation of water quality within the vicinity of the project. Less than significant impact.
- d) Discussion: The project site is not mapped to be located within a Flood Hazard zone. There is no levee or dam within proximity to the project site; therefore, the proposed project will not expose people or structures to any hazard associated with the failure of a levee or dam. The site is not mapped to be located within a seiche, tsunami, or mudflow hazard area. No impact.
- e) Discussion: The project would not conflict with or obstruct any existing water quality control plan or sustainable groundwater management plan. No impact.

<u>XI. LAND USE AND PLANNING.</u> 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?	☐	☐	☐	☒

- a) Discussion: The proposed development will be located on an existing parcel in a low density residential area and will not physically divide an established community.
- b) Discussion: The proposed project is in conformance with all local regulations.

<u>XII. MINERAL RESOURCES.</u> 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) Discussion: There are no known mineral resources within the project area; therefore, there will be no loss of availability of a known mineral resource as a result of the project.
- b) Discussion: There are no delineated locally-important mineral resources within the project boundaries; therefore, there will be no loss in locally-important mineral resource recovery sites.

<u>XIII. NOISE.</u> 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 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?	☐	☐	☐	☒

- a) – b) Discussion: The existing wireless communications facility and associated generator and grading to accommodate the improvements, along with the proposed modifications and additions will result in noise that may expose people to noise. Noise levels at the project site are not anticipated to permanently increase as a result of the proposed project. No excessive noise or excessive groundborne vibration will result from the project that would violate a local general plan or noise ordinance as all development within the Mendocino County Coastal Zone is subject to Exterior Noise Limit Standards specified in Appendix B of Title 20, Division II of Mendocino County Code. Therefore, potential impacts will be less than significant.
- c) Discussion: The site is not located within an airport zone and there are no private airstrips within close proximity to the project that would subject people residing or working in the project area to excessive noise levels; therefore, there will be no impact.

<u>XIV. POPULATION AND HOUSING.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

- a) Discussion: The proposed project consists of construction of a wireless communications facility and associated internal access roads and related equipment. The proposed project will not induce substantial population growth as the project is not residential or commercial in nature nor does it extend major infrastructure that would induce population growth. Therefore, there will be no impact.
- b) – c) Discussion: The proposed project does not displace any existing housing. Solely a shed is required to be removed to accommodate the project. The project does not displace any people and therefore would not necessitate construction of replacement housing elsewhere. Therefore, there will be no impact.

<u>XV. PUBLIC SERVICES.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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:	☐	☐	☐	☒
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

- a) Discussion: The proposed project will not result in adverse impacts associated with provision of governmental facilities or need for new or physically altered governmental facilities that may result in environmental impacts in order to maintain acceptable service ratios and response times for public services. This is primarily due to the fact that the property already contains an existing residential and recreational/retreat use type that has existed for many years and the proposed application will not result in an increase in use of the property beyond existing levels; therefore, there will be no impact to public services. The tower will be built to provide co-location opportunities for future carriers or public safety entities and so the project will be beneficial for public services in the area.

The parcel is located in an area classified with a "Moderate Fire Hazard" severity rating. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (CalFire) and the Albion Little River Fire District for structural protection. The project application was referred to the CalFire for input. CalFire responded stating that the applicant is required to adhere to 4290 Regulations (CalFire #532-17). Albion Little River Fire District did not provide any comments on the project.

<u>XVI. RECREATION.</u>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

- a) – b) Discussion: The site is already developed with the existing residential and recreational/retreat use and this application does not seek to change any of the existing use but solely is to add a wireless communication facility to the parcel. Therefore, there will be no increase in the use of existing neighborhood and regional parks and recreational facilities as a result of the project and no recreational facilities are required that may adversely affect the environment.

<u>XVII. TRANSPORTATION.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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?	☐	☐	☐	☒

- a) – b) Discussion: The proposed project, which consists of construction of a new wireless communications facility and associated equipment, will not conflict with any plan, ordinance or policy that establishes measures of effectiveness for the performance of the circulation system. After construction is complete, maintenance workers are anticipated to visit the site approximately once per month, resulting in few additional vehicle trips per day than what presently exists from existing uses on the parcel.
- c) Discussion: The proposed project will not increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses, as the site is already developed with an existing use and this application proposes additional development that utilizes the existing access point onto Navarro Ridge Road (CR 518), none of which will create a traffic hazard.
- d) Discussion: The proposed project will not result in inadequate emergency access. The primary concern for emergency access is remote areas is for wildland fires. Fire protection services for wildland areas are provided by the California Department of Forestry and Fire Protection (CalFire) and the Albion Little River Fire District for structural protection. The project application was referred to the CalFire for input. CalFire responded stating that the applicant is required to adhere to 4290 Regulations (CalFire #532-17). Turnouts and hammerheads are shown on the application site plan to ensure adequate emergency access is provided. Albion Little River Fire District did not provide any comments on the project. A Condition of Approval is recommended to ensure compliance with recommendations provided by CalFire.

In addition, Mendocino County Department of Transportation commented that the applicant shall construct a commercial driveway approach onto the County Road. This will ensure that the access point meets current standards furthering the ability for emergency responders to access the site.

<u>XVIII. TRIBAL CULTURAL RESOURCES.</u> 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 §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 §5020.1(k)?	☐	☐	☐	☒
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 §5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the lead agency shall consider the	☐	☐	☐	☒

significance of the resource to a California Native American tribe.				
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- a) – ii) Discussion: The Mendocino County Archaeological Commission accepted the submitted Revised Cultural Resources Investigation prepared by Archaeological Resources Technology dated November 25, 2018 at its February 13, 2019 meeting and recommended that only the standard discovery clause condition be applied to the proposed project as no sites were identified in the Investigation. A Standard Condition advises the property owner of the Discovery Clause, which prescribes the procedures subsequent to the discovery of any cultural resources during construction of the project.

Additionally, the project application was referred to various tribes that requested consultation on planning projects under Assembly Bill (AB) 52 and no additional comments or concerns were expressed by the tribes receiving the referral.

<u>XIX. UTILITIES AND SERVICE SYSTEMS.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation 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) Discussion: The project would not require or result in expanded wastewater, power, or gas facilities. The project is a telecommunications facility and as such represents an expansion of the region's telecommunications network, but as demonstrated by the rest of this document it does not pose a significant environmental impact as mitigated.
- b) Discussion: No water supply is necessary for the proposed project; therefore, water supplies are found to be sufficient and no new or expanded entitlements are needed.
- c) Discussion: The project site is not served by a wastewater treatment provider and there is no district nearby that would feasibly be extending service to the parcel in the future. Additionally, no septic infrastructure is necessary to accommodate the proposed development.
- d) – e) Discussion: Curbside pick-up is available to the parcel, additionally several Solid Waste Transfer Stations are located within 15 miles of the project site and can accommodate the solid waste disposal needs of the site. No projected long-term increase in solid waste generation is anticipated as a result of the project, but there will be short-term increases associated with construction materials during construction of the proposed new development. Construction debris will be properly disposed of after completion of the

proposed development. There will be no impact to capacity as a result of the project and the proposed project is in compliance with federal, state, and local statutes for solid waste disposal. No impact.

<u>XX. WILDFIRE.</u> Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage challenges?	☐	☐	☒	☐

- a) Discussion: The project would not affect an adopted emergency response or evacuation plan. No impact.
- b) Discussion: The height of the tower may place it at risk of falling in the event of highwinds, which could conceivably pose an ignition hazard or an obstacle to firefighting efforts. However, the engineering required for a building permit limits this risk to a less than significant level. No other factors would seem to increase pollutant or wildfire risk to occupants of the subject property. The project itself shall be unmanned on a day to day basis. Less than significant impact.
- c) Discussion: Limited vegetation removal, including trimming but not removal of nearby trees, may be required to minimize wildfire hazard and comply with CalFire requirements. Mitigation Measure AES-1 requires that any such vegetation removal be kept to the minimum necessary. Less than significant impact.
- d) Discussion: The project will involve some grading, but will not have a significant effect on soil stability or runoff/drainage patterns. Less than significant impact.

<u>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</u>	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 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 with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	☐	☐	☒	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

- a) Discussion: Based on the discussion in Section IV Biological Resources and throughout the report, there is no evidence that the project has the potential to degrade the quality of the environment.

Based on discussion in Section V Cultural Resources and throughout the report, 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) Discussion: The nearest wireless telecommunication facilities that staff is aware of are located approximately 3 miles to the west of the project site near the intersection of Navarro Ridge Road (CR 518) and State Route 1. There are no impacts associated with the current project that become significant when considered in conjunction with other existing or planned facilities in the vicinity. Less than significant impact.
- c) Discussion: Staff is aware of public concerns regarding potential health effects based on environmental effects of radio frequency emissions from these types of wireless telecommunication facilities. The Federal Communications Commission (FCC) has set maximum permissible exposure limits for radio frequency transmitters, and the Telecommunications Act of 1996 prohibits local governments from regulating wireless service facilities based on environmental effects of radio frequency emissions as long as the facilities comply with FCC regulations for emissions.

The wireless communications facility will be within a compound that is surrounded by a locked chain link fence is not in a location likely to be accessed by anyone other than maintenance personnel. Appropriate signage will be posted disclosing that the facility is not to be accessed by anyone other than maintenance personnel.

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.

October 2, 2026

DATE

Rob Fitzsimmons

ROB FITZSIMMONS
PLANNER III