

an application for a building permit (with CDs) is submitted prior to CUP approval. Because the applicant submitted early for the building permit, the updated CD sheets are available. This minor relocation of the access road would not result in any new or significant impacts as addressed in the IS/MND or Staff Report.

Sheet A-2

Subsequent to submittal of the Conditional Use Permit (CUP) application and accompanying Zoning Drawings (ZDs), the applicant made modifications to equipment placement within the proposed fenced equipment lease area. These changes are reflected in the Construction Drawings (CDs) that were submitted for the building permit on May 8, 2020. As discussed above, the applicant submitted early for the building permit so the updated CD sheets are available.

CD Sheets A-1, A-1.1, and A-2 are attached to this memo as Exhibit B.

Item 3. Correction to Oak Woodland Impacts and In-lieu Fee, and Addition of Condition of Approval Relative to In-Lieu Fee Payment

The discussion of oak woodland impacts in the IS/MND includes acreage and in-lieu fee information based on the original Oak Resources Technical Report (July 2019). Based on the July 2109 report, the IS/MND and the Findings indicate that the proposed project would result in impacts 0.07 acre of oak woodlands, or 37% of oak woodlands in the biological study area, and an in-lieu fee of \$579.95. Based on feedback from Planning staff that the oak woodland impact assessment be expanded to cover the entire aerial canopy of impacted oak trees within the project footprint, the applicant submitted a revised Oak Resources Technical Report (March 2020) in April 2020. The March 2020 report indicates that 0.38 acre of oak woodlands, or 49% (0.487) of oak woodlands in the biological study area, and an in-lieu fee of \$3,148. The March 2020 Oak Resources Technical Report is attached to this memo as Exhibit C. Information from the July 2019 Oak Resources Technical Report was included in the IS/MND by reference and the report was not included as an exhibit.

The significance determination in the IS/MND is correct. The IS/MND concludes that impacts to oak woodlands would be less than significant with payment of the in-lieu fee. The change in acreage of oak woodland that would be affected (+0.31 acre), based on the revised Oak Resources Technical Report (March 2020), does not constitute a change in the significance determination in the IS/MND. The in-lieu fee would be applied at the higher amount determined in the most recent report.

This correction can be implemented by updating the following language in the Findings (additions shown as underlined text and deletions shown as strikethrough font):

Page 2, fourth full paragraph, second sentence:

The proposed project would result in the removal of ~~0.070~~.38-acre impact to oak woodland, subject to the in-lieu fee as specified in the County Oak Resources Management Plan.

Page 3, General Plan Finding 2.7 (relative to General Plan Policy 7.4.4.4):

Rationale: The proposed project would require the removal of ~~0.070~~.38 acre of oak woodland. None of the trees to be removed are considered heritage trees (as defined in the El Dorado County Zoning Ordinance Section 130.39.030). The proposed project would be conditioned to mitigate for impacts to oak woodlands through payment of the County's in-lieu fee. The current in-lieu fee is \$8,285 per acre, as specified in the County Oak Resources Management Plan (ORMP). The in-lieu fee cost for a ~~0.070~~.38-acre impact to oak woodland is ~~\$579,953~~,148.

In addition, the following Condition of Approval should be added to the Staff Report:

Payment of Oak Woodland In-lieu Fee: The applicant shall make the actual and full payment of the Oak Woodland In-lieu Fee to mitigate for impacts to oak woodland prior to issuance of a building permit.

Item 4. Transportation Policies and Findings

The following Findings language was provided to Planning staff by Department of Transportation staff for the proposed project. This correction can be implemented by adding the following language, as presented in Items 1.a and 1.b. below, to the Findings in the Staff Report.

1.a. The following language in the Staff Report will be modified as shown below. The underlined text shall be added to the General Plan Consistency discussion:

Page 4, General Plan Consistency discussion

General Plan Consistency: Staff has reviewed the project for consistency with all applicable General Plan policies including Policy 2.2.1.2 (appropriate land use types and density), Policy 5.1.2.1 (adequacy of public services and utilities), Policies TC-Xa through TC-Xi (Transportation and Circulation Element), Policy 5.1.2.2 (adequate public services for new discretionary development), Policy 5.7.2.1 (adequate fire protection services), Policy 6.2.3.2 (adequate emergency access), and Policy 7.4.4.4 (impacts to oak resources). Staff has determined that the project is consistent with these policies and related requirements in the El

Dorado County General Plan, as discussed in more detail in Section 2.0 of the Findings.

1.b. The following Transportation-related Findings will be added to the Findings section of the Staff Report:

2.x The project is consistent with General Plan Policy TC-Xa

Except as otherwise provided, the following TC-Xa policies shall remain in effect indefinitely, unless amended by voters:

1. Traffic from residential development projects of five or more units or parcels of land shall not result in, or worsen, Level of Service F (gridlock, stop-and-go) traffic congestion during weekday, peak-hour periods on any highway, road, interchange or intersection in the unincorporated areas of the county.

Rationale: The project is not a residential development; therefore this Policy does not apply.

2. The County shall not add any additional segments of U.S. Highway 50, or any other highways and roads, to the County's list of roads from the original Table TC-2 of the 2004 General Plan that are allowed to operate at Level of Service F without first getting the voters' approval.

Rationale: This is not applicable as the Project is not requesting any modifications to Table TC-2.

3. intentionally blank (Resolution 125-2019, August 6, 2019)
4. intentionally blank (Resolution 159-2017, October 24, 2017)
5. The County shall not create an Infrastructure Financing District unless allowed by a 2/3rds majority vote of the people within that district.

Rationale: This is not applicable as the Project is not requesting the County create an Infrastructure Financing District.

6. intentionally blank (Resolution 159-2017, October 24, 2017)
7. Before giving approval of any kind to a residential development project of five or more units or parcels of land, the County shall make a finding that the project complies with the policies above. If this finding cannot be made, then the County shall not approve the project in order to protect the public's health and safety as provided by state law to assure that safe and adequate roads and highways are in place as such development occurs.

Rationale: The project is not a residential development; therefore this Policy does not apply.

2.x The project is consistent with General Plan Policy TC-Xb

To ensure that potential development in the County does not exceed available roadway capacity, the County shall:

- A. Every year prepare an annual Capital Improvement Program (CIP) specifying expenditures for roadway improvements within the next 10 years. At least every five years prepare a CIP specifying expenditures for roadway improvements within the next 20 years. Each plan shall contain identification of funding sources sufficient to develop the improvements identified;
- B. At least every five years, prepare a Traffic Impact Mitigation (TIM) Fee Program specifying roadway improvements to be completed within the next 20 years to ensure compliance with all applicable level of service and other standards in this plan, and;
- C. Annually monitor traffic volumes on the county's major roadway system depicted in Figure TC-1.

Rationale: This policy is not applicable as this policy refers to the County preparing a Capital Improvement Program (CIP), preparing a Traffic Impact Mitigation (TIM) Fee Program, and monitoring traffic volumes.

2.x The project is consistent with General Plan Policy TC-Xc

Developer paid traffic impact fees combined with any other available funds shall fully pay for building all necessary road capacity improvements to fully offset and mitigate all direct and cumulative traffic impacts from new development during peak hours upon any highways, arterial roads and their intersections during weekday, peak-hour periods in unincorporated areas of the county. (Resolution 201-2018, September 25, 2018)

Rationale: This policy is not applicable as this policy directs how the County will pay for building the necessary road capacity.

2.x The project is consistent with General Plan Policy TC-Xd

Level of Service (LOS) for County-maintained roads and state highways within the unincorporated areas of the county shall not be worse than LOS E in the Community Regions or LOS D in the Rural Centers and Rural Regions except as specified in Table TC-2. The volume to capacity ratio of the roadway segments listed in Table TC-2 shall not exceed the ratio specified in that table. Level of Service will be as defined in the latest edition of the Highway Capacity Manual (Transportation Research Board, National Research Council) and calculated using the methodologies contained in that manual. Analysis periods shall be based on the professional judgement of the Department of Transportation which shall consider periods including, but not limited to, Weekday Average Daily Traffic (ADT), AM Peak Hour, and PM Peak hour traffic volumes.”

Rationale: This project will not worsen (as defined by General Plan Policy TC-Xe) Level of Service (LOS) for any county- maintained road or state highway.

2.x The project is consistent with General Plan Policy TC-Xe

For the purposes of this Transportation and Circulation Element, “worsen” is defined as any of the following number of project trips using a road facility at the time of issuance of a use and occupancy permit for the development project:

- A. A 2 percent increase in traffic during the a.m. peak hour, p.m. peak hour, or daily, or
- B. The addition of 100 or more daily trips, or
- C. The addition of 10 or more trips during the a.m. peak hour or the p.m. peak hour.

Rationale: This project will generate fewer than 10 trips in the peak hour, and fewer than 100 daily trips. The thresholds in criteria A, B or C of this policy are not met.

2.x The project is consistent with General Plan Policy TC-Xf

At the time of approval of a tentative map for a single family residential subdivision of five or more parcels that worsens (defined as a project that triggers Policy TC-Xe [A] or [B] or [C]) traffic on the County road system, the County shall do one of the following: (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element based on existing traffic plus traffic generated from the development plus forecasted traffic growth at 10-years from project submittal; or (2) ensure the commencement of construction of the necessary road improvements are included in the County’s 10-year CIP.

For all other discretionary projects that worsen (defined as a project that triggers Policy TC-Xe [A] or [B] or [C]) traffic on the County road system, the County shall do one of the following: (1) condition the project to construct all road improvements necessary to maintain or attain Level of Service standards detailed in this Transportation and Circulation Element; or (2) ensure the construction of the necessary road improvements are included in the County’s 20-year CIP.

Rationale: The project does not meet any of the thresholds specified in General Plan Policy TC-Xe: Therefore, the project is consistent with this Policy.

2.x The project is consistent with General Plan Policy TC-Xg

Each development project shall dedicate right-of-way, design and construct or fund any improvements necessary to mitigate the effects of traffic from the project. The County shall require an analysis of impacts of traffic from the development project, including impacts from truck traffic, and require dedication of needed right-of-way and construction of road facilities as a condition of the development. This policy shall remain in effect indefinitely unless amended by voters.

Rationale: This policy is not applicable as this project does not worsen traffic conditions, and no mitigating improvements are required.

2.x This project is consistent with General Plan Policy TC-Xh

All subdivisions shall be conditioned to pay the traffic impact fees in effect at the time a building permit is issued for any parcel created by the subdivision

Rationale: This project will pay TIM fees at the time a building permit is issued.

2.x The project is consistent with General Plan Policy TC-Xi

The planning for the widening of U.S. Highway 50, consistent with the policies of this General Plan, shall be a priority of the County. The County shall coordinate with other affected agencies, such as the City of Folsom, the County of Sacramento, and Sacramento Area Council of Governments (SACOG) to ensure that U.S. Highway 50 capacity enhancing projects are coordinated with these agencies with the goal of delivering these projects on a schedule agreed to by related regional agencies.

Rationale: This policy is not applicable to the project as it is direction to the County to coordinate with other agencies.

Item 5. Public Comments Received

As of Thursday, August 7, 2020, Planning Staff has received one phone call from a member of the public and two emails regarding the proposed project.

Phone call

The caller expressed that he thought the height of the tower seemed “pretty tall” and indicated that he had a view of the project area from his house. The caller asked if the project site is in an Important Biological Corridor (IBC), and mentioned that he thought one of the neighbors had some type of protected habitat on their property but did not have more information about that. Lastly, the caller did not express opposition to or support for the project. Staff asked if the caller wanted to submit a formal comment and he responded that he would, instead, attend the Planning Commission hearing.

Mr. Ken Greenwood (email) (Exhibit D)

Comments in Mr. Greenwood’s email focused on aesthetics, the alternative sites analysis, hazards (fallover setbacks), public noticing and participation, and impacts to oak woodland. Mr. Greenwood expressed opposition to the proposed project.

Ms. Lisa Vancil (email) (Exhibit E)

Ms. Vancil lives on Saint Garth Way, about 0.75 miles south of the project site. She expressed support for the proposed project. Comments in Ms. Vancil’s email focused on the need for

improved internet and cell phone service in the area for the community. Ms. Vancil indicated that she works from home and has struggled with the services in the area for three years. She also indicated that when the power in the area goes out, her landline at home does not work. She has an elderly person in her home and is concerned about getting the quickest response if that person needs help.

Aesthetic/Visual Simulations

The project site is not located within an identified scenic corridor or scenic vista. The photo simulations provided by the applicant comply with the visual simulation standards set forward by Section 130.40.130.C.

Alternative Sites Analysis

The Alternative Sites Analysis provided by the applicant complies with the siting standards set forward by Section 130.40.130.A.1.

Hazards

The towers would be engineered and constructed to current building code minimizing the potential for “fallover”. Additionally, the tower site is approximately 400 feet from the nearest public roadway (Big Canyon Road to the east) and approximately 730 feet from the nearest residence, located northeast of the tower site.

Important Biological Corridor

As indicated in the Biological Resources Evaluation prepared for the proposed project, the project site is located within an Important Biological Corridor (IBC). Per the Biological Resources Evaluation, the project would not impede wildlife movement or migration since there are no barriers installed that wildlife cannot easily circumvent.

Oak Woodland

Oak woodland impacts were reassessed in an updated Oak Resources Technical Report (March 2020). See discussion under Item 3, Correction to Oak Woodland Impacts and In-lieu Fee, and Addition of Condition of Approval Relative to In-Lieu Fee Payment, above.

Potential Effects to Habitat on Other Properties

As analyzed in the IS/MND, the project site is not located on private property under separate ownership from the project parcel. The project site is located in El Dorado County Rare Plant Mitigation Area 2 and would proposed payment of an in-lieu fee or participation in off-site rare plant mitigation.

Public Noticing and Participation

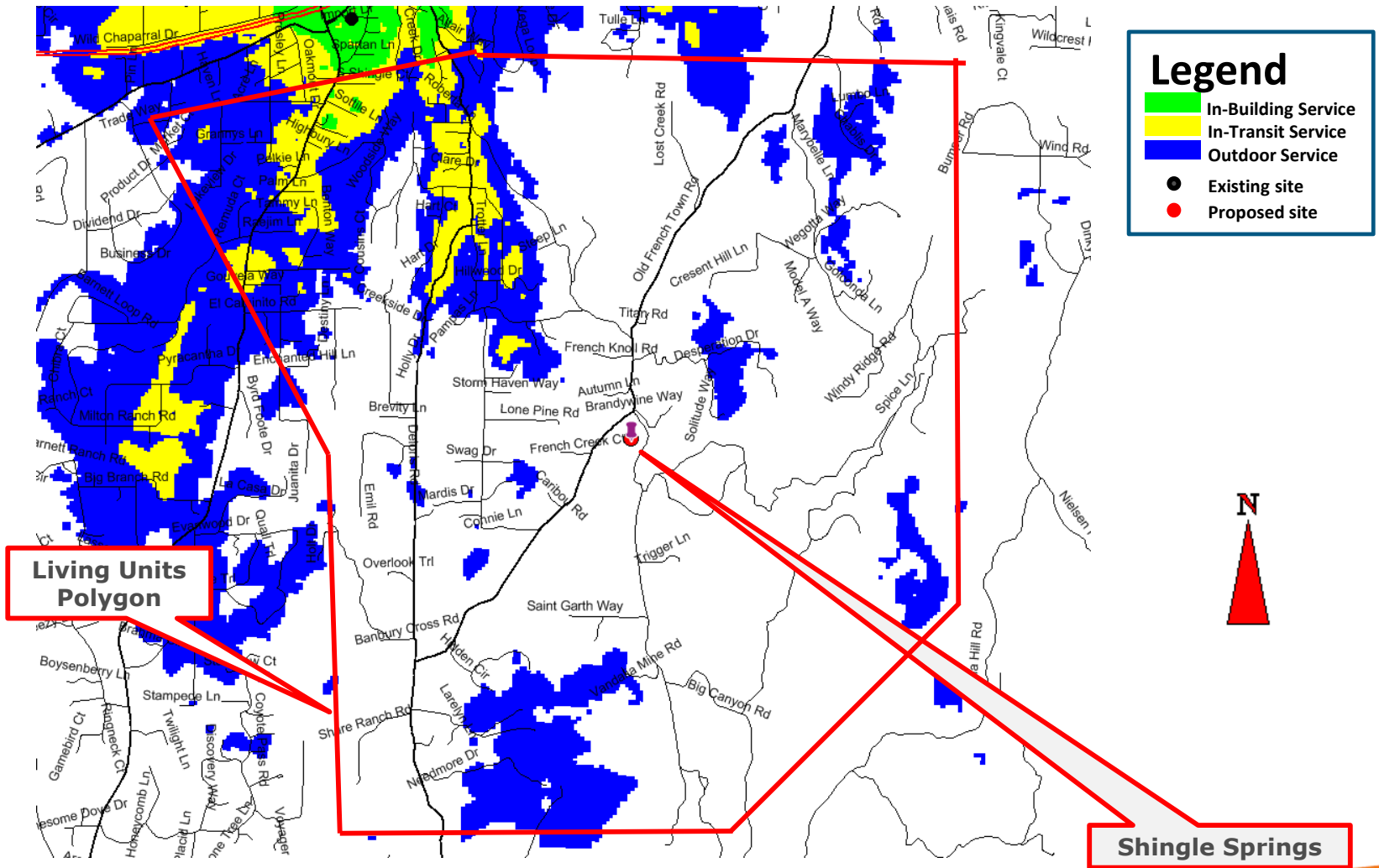
Notwithstanding the notification map, public noticing for the hearing of this item and notice of availability to review the IS/MND was performed in compliance with County noticing practice for Conditional Use Permits. Additionally, in compliance with the County's Environmental Manual (Resolution No. 61-87) and in exceedance of California Environmental Quality Act (CEQA) Guidelines Section 15105 – which requires that the public review period for a negative declaration be not less than 20 days – the public review period for the IS/MND started on July 14, 2020 and ends on August 12, 2020. In addition, the Planning Commission hearing for consideration to adopt the Mitigated Negative Declaration and to approve the proposed project is open to the public.

Exhibit A to Staff Memo (08-07-2020)
Revised Coverage Maps
Project CUP19-0007
AT&T CAF II, Frenchtown 2 (Shingle Springs)

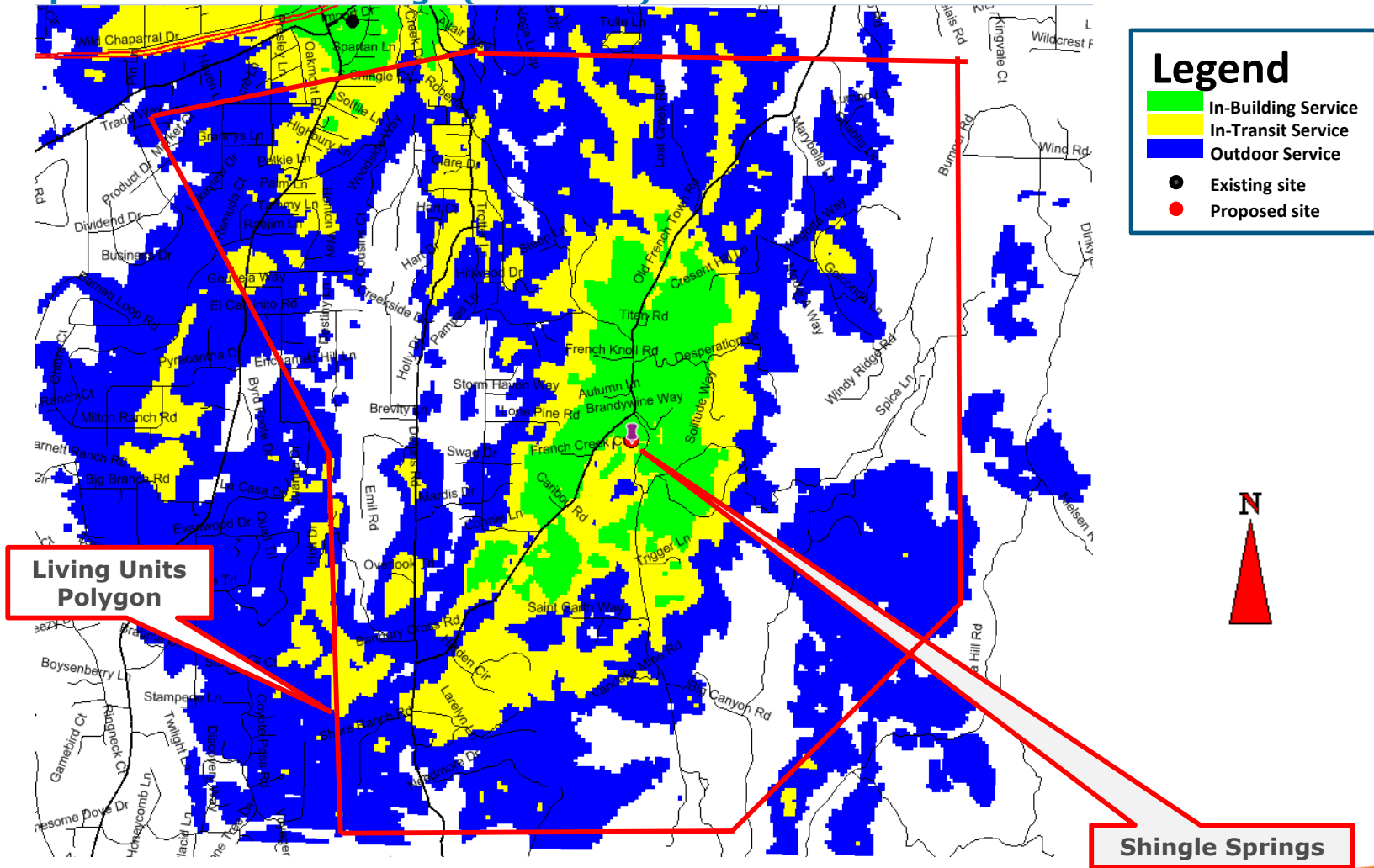
CVL02082 Zoning Propagation Map

July 1, 2019

Existing LTE 700 Coverage



Proposed LTE 700 Coverage (RC = 150')



**Exhibit C to Staff Memo (08-07-2020) Updated
Oak Resources Technical Report Project
CUP19-0007
AT&T CAF II, Frenchtown 2 (Shingle Springs)**

DRAFT

**Oak Resources Technical Report
for the
AT&T Frenchtown 2/Butte Meadows CVL02082 Project**

El Dorado County, CA

Prepared by:

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March 2020

Oak Resources Technical Report
for the
AT&T Frenchtown 2/Butte Meadows CVL02082 Project

El Dorado County, CA

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I. INTRODUCTION

A. Purpose of Report

The purpose of this report is to quantify oak resources and impacts, and recommend preservation and mitigation methods for the AT&T Frenchtown 2/Butte Meadows Site CVL02082 Project (Project) based on the specifications of the El Dorado County Oak Resources Management Plan (ORMP; El Dorado County 2017a) and the Oak Conservation Ordinance (No. 5061). An oak woodland removal permit is required to authorize removal of oak woodlands (El Dorado County 2017a). This report is to be submitted with the oak woodland removal permit application.

B. Project Background

The Project is located approximately two miles south of the community of Shingle Springs, in El Dorado County, CA on APN 091-070-022. Natural communities were previously mapped and evaluated during a biological resource evaluation (BRE) conducted by Sycamore Environmental Consultants in June 2019 (Sycamore Environmental 2019). Oak woodlands classified as Interior Live Oak Forest Alliance (71.080.00) (CDFW 2019, Sawyer et al. 2009) were identified within the BSA during the June field survey. The oak woodlands are not located within a Priority Conservation Area (El Dorado County 2017a).

A draft oak resources technical report for this Project was submitted September 2019 to El Dorado County. Comments were received from the County in January 2020 that requested expansion of oak woodland impacts to cover the entire aerial canopy of impacted oak trees within the project footprint. This revised report addresses expansion of oak woodland impacts within the project footprint.

C. Project Applicant

Applicant:

AT&T Mobility
5001 Executive Parkway
San Ramon, CA 94583

Consulting Planner

Epic Wireless
605 Coolidge Drive, Suite 100,
Folsom, CA 95630
Phone: 209/ 968-4315

Contact: Jared Kearsley

II. COUNTY OAK ORDINANCE & MANAGEMENT PLAN

El Dorado County regulates impacts to oak trees and woodlands through the ORMP (El Dorado County 2017a) and the Oak Conservation Ordinance (No. 5061) (El Dorado County 2017b). The purpose of the ORMP is to define mitigation requirements for impacts to oak resources (oak woodlands, individual native oak trees, and Heritage Trees) and to outline strategies for oak woodland conservation. Section 2.5 of the ORMP provides guidelines for preparation of Oak Resources Technical Reports. Native oak trees are defined as any live native oak tree of the genus *Quercus*, including blue oak (*Quercus douglasii*), valley oak (*Quercus lobata*), California black oak (*Quercus kelloggii*), interior live oak (*Quercus wislizeni*), canyon live oak (*Quercus chrysolepis*), Oregon oak (*Quercus garryana*), oracle oak (*Quercus x morehus*), or hybrids thereof. ORMP specifications include mapping of oak woodlands at the site and collecting data for individual native oak trees and Heritage Trees.

Oak woodland is defined by the California Fish and Game Code (Section 1361) as an oak stand with a greater than 10 percent canopy cover or that may have historically supported greater than 10 percent canopy cover. An oak woodland removal permit is required for discretionary or ministerial projects that will remove any trees that are a component of an oak woodland. Mitigation is based on the percent of oak woodland impacted by the Project. The ORMP defines Heritage Trees as any live native oak tree with a single main trunk measuring 36 inches diameter breast height (dbh) or greater, or with a multiple trunk and an aggregate trunk dbh measuring 36 inches or greater. Dbh is the measurement of a tree in inches at 4.5 feet above natural grade on the uphill side of a tree. The ORMP requires mitigation for the removal of Heritage trees, regardless of whether the Heritage tree is located inside or outside an oak woodland.

Individual oak trees are native oaks located outside an oak woodland; and include any live native oak tree with a single trunk measuring greater than 6 inches dbh or with a multiple trunk and aggregate trunk diameter measuring greater than 10 inches dbh that is not a Heritage tree. In the case of trees with multiple trunks, the dbh of all stems shall be combined. The County's "Summary Data Sheet of Oak Resources Impacts for Oak Tree/Oak Woodland Removal Permits" also requests individual tree data for trees between 24 inches and less than 36 inches dbh. Data for individual trees between 24 and less than 36 inches dbh are used not for impact and mitigation calculations, but for future County evaluation of the threshold for heritage trees.

The Oak Resource Conservation Ordinance defines impacts to individual trees and oak woodlands as follows:

For individual native oak trees, the physical destruction, displacement or removal of a tree or portions of a tree caused by poisoning, cutting, burning, relocation for transplanting, bulldozing or other mechanical, chemical, or physical means. For oak woodlands, tree and land clearing associated with land development, including, but not limited to, grading, clearing, or otherwise modifying land for roads, driveways, building pads, landscaping, utility easements, fire-safe clearance and other development activities (El Dorado County Code §130.30.39).

III. STUDY METHODS

Kate Gazzo, M.S., Ecologist and Nicole Ibanez, Biologist collected data on oak woodlands within the BSA during a June 2019 biological survey. Data on trees and oak woodlands within the BSA were recorded using a handheld Nomad 5 Global Positioning System (GPS) unit. All oak trees surveyed within the BSA were considered part of an oak woodland. There were no individual oak trees outside the oak

woodland. Trees visually assessed to be greater than 6 inches dbh were measured in the field to determine if the tree met the County's size requirements for data collection, or if it met the definition of a Heritage Tree.

For each tree included in the survey, the species, dbh, dripline (canopy radius), height, and a general assessment of health and structure condition was recorded (Appendix A). Dbh was measured at 4.5 feet above the ground, unless a tree characteristic, such as a branch attachment, interfered with the measurement at that height. In such cases, the diameter was measured at the narrowest point in the trunk between the ground and 4.5 ft, or above the point of interference (Council of Tree and Landscape Appraisers 2000). The location of trees included in the survey were recorded with a GPS.

Tree condition was judged in five categories with respect to structure, health, vigor, defects, conformance to generally accepted arboricultural standards of care, disease, general health, damage, danger of falling, and suitability for retention in a developed area. The five categories were good (G; no defects or minor defects), fair to good (F-G; defects), fair (F; obvious defects), fair to poor (F-P; severe defects), and poor (P; severe defects, and short-term death or structural failure of the tree is expected). Condition was judged based on an external inspection of each tree from the ground.

GPS data on biological communities collected during the June 2019 field survey and the most recent aerial images from Google Earth (26 August 2018) were used to create a shapefile of the oak woodland boundary within the BSA in ArcGIS. One-hundred percent (100%) project plans were overlaid with the oak woodland boundary to calculate the acreage of project impacts to oak woodlands in ArcGIS.

To address January 2020 comments from the County, oak woodland impacts have been expanded to capture the entire aerial canopies of oak trees potentially impacted by the project. Acreages of oak woodlands, impacts to oak woodlands, and the BSA were recalculated in ArcGIS for this report.

The Oak Resource Conservation Ordinance (No. 5061) and the ORMP were referenced to determine impacts and current in-lieu fees for oak woodlands.

IV. OAK RESOURCES WITHIN THE BSA

There is 0.78 acre of interior live oak woodland in the BSA (Figure 1). Oak woodland occurs around the edges of the proposed tower footprint and along the existing access road. The oak woodland canopy is mostly continuous and dominated by interior live oak (*Quercus wislizeni*). The shrub layer is absent within the oak woodland community, except toward the northernmost portion of the BSA where toyon (*Heteromeles arbutifolia*) and poison oak (*Toxicodendron diversilobum*) comprise the shrub layer. Oak trees within the BSA range from 6 to 32 inches dbh (Appendix A). There are no oak trees within the BSA greater than 36 inches dbh. Three multi-stem oak trees in the BSA have an aggregate trunk dbh between 24 and 35 inches dbh. Data were not collected for oak trees that did not meet the County's size criteria for protection (less than 24 inches dbh). Previously cleared areas consisting of annual grassland exist at the proposed tower location and along the existing access road.

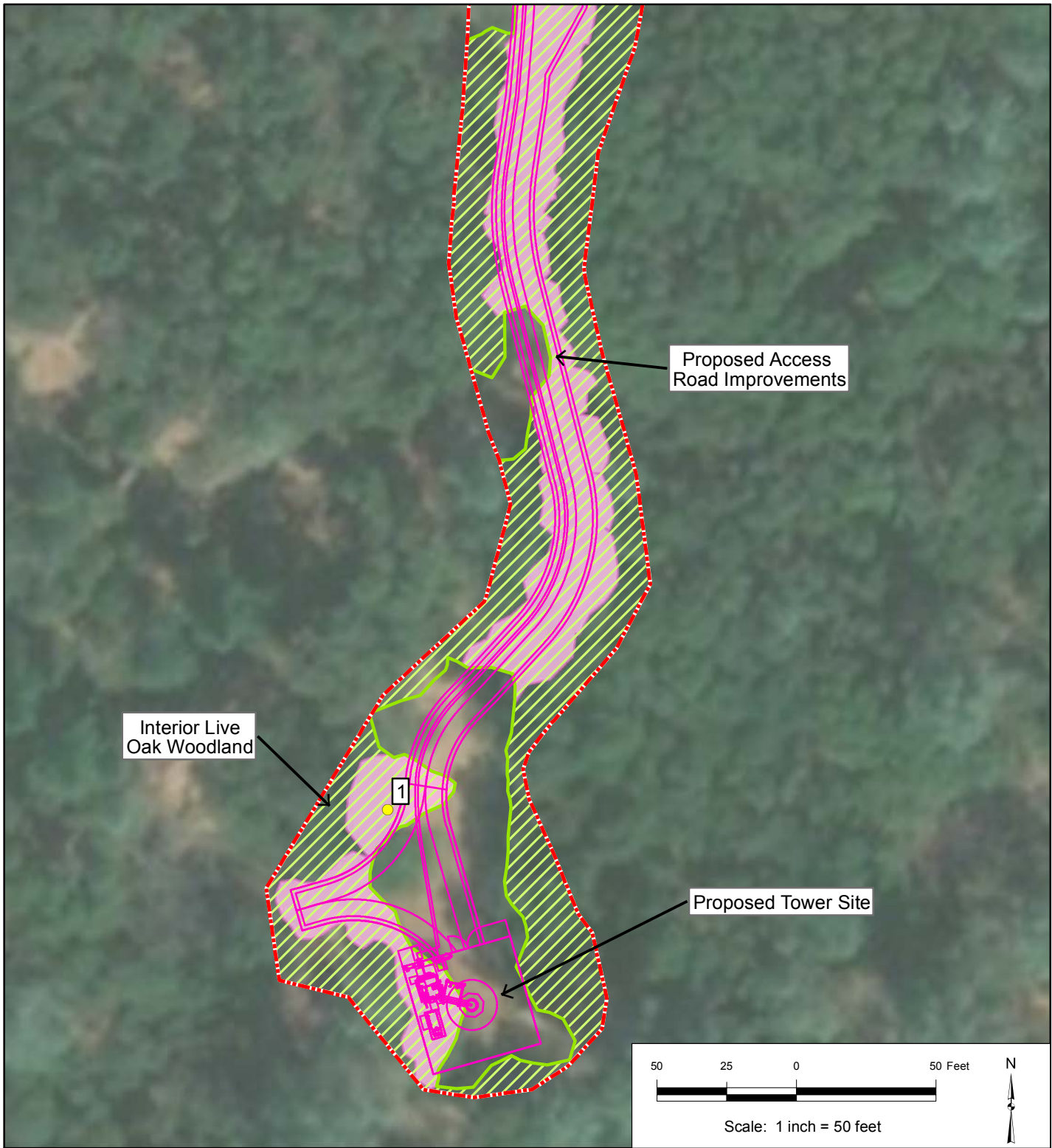
V. PROJECT IMPACTS TO OAK RESOURCES

Oak woodlands comprise 0.78 acre of the BSA. The Project will impact 0.38 acre of oak woodlands or 49% (0.487) of oak woodlands within the BSA (impacted oak woodlands [0.38 acre]/total oak woodlands in BSA [0.78 acre]).

Project activities that will impact oak woodlands include grading and graveling a 12-foot-wide access road that spans the length of the BSA (709 feet) and a hammerhead turn-around, and excavating two parallel 771-foot long, 24-inch deep utility trenches within the center of the access road. One trench is for power and the second is for telecommunications. The powerline trench will be 3 inches wide and the telecommunications trench will be 4 inches wide. The proposed road, turn-around, and utility trench are located under the canopy of oak trees within approximately 10 feet of the base of some trees. Depending on vehicle clearance along the access road, some trees may need to be entirely removed or simply pruned for access to the site. “Impacts to oak woodlands” indicated in Figure 1 cover both tree removal (felling) and indirect impacts to tree trunks, branches, or roots from equipment.

The ORMP defines the Root Protection Zone (RPZ) as “roughly one-third larger than the drip line (or outermost edge of the foliage based on the longest branch).” Project activities that occur within the RPZ may impact tree roots in two ways. First, loss of small, fine, absorbing roots [from activities such as grading] results in a reduced capacity to acquire water and nutrients, which can lead to a relatively slow decline and/or death of a tree. Second, the loss of larger, structural roots [from activities such as trenching] may result in sudden tree failure (Matheny and Clark 1998). How the tree responds to construction impacts depends on the current health of the tree, tree species, the amount of root loss, and how it is impacted during construction. Healthy trees can tolerate a loss of about a third of their root systems (Matheny and Clark 1998).

Tree preservation measures are identified in Section VI below that will minimize impacts to oak woodlands within the BSA.

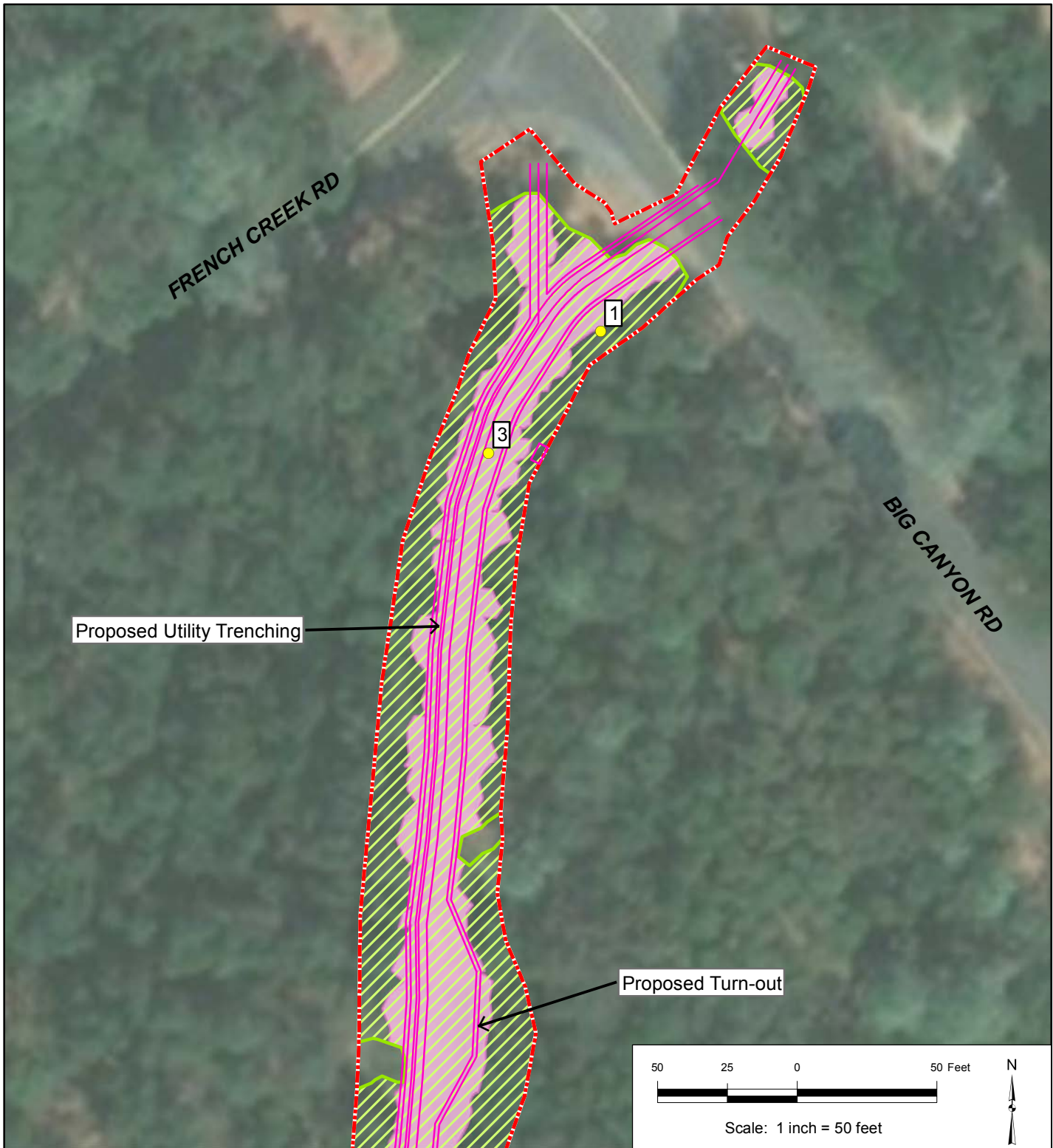


AT&T Frenchtown 2 - Butte Meadows Site
 CVL02082 Project
 El Dorado County, CA
 26 February 2020

- Biological Study Area (BSA; 0.99 ac)
- Oak Tree (24-35 inch DBH)
- Proposed Project
- Interior Live Oak Woodland (0.78 ac)
- Impacts to Oak Woodland (0.38 ac)

Aerial Photograph: 26 August 2018
 NAIP2017 USDA FSA Imagery
 ESRI ArcGIS Basemap Layer

Figure 1. Oak Resource Map
 Sheet 1 of 2



AT&T Frenchtown 2 - Butte Meadows Site
 CVL02082 Project
 El Dorado County, CA
 26 February 2020

- Biological Study Area (BSA; 0.99 ac)
- Oak Tree (24-35 inch DBH)
- Proposed Project
- Interior Live Oak Woodland (0.78 ac)
- Impacts to Oak Woodland (0.38 ac)

Aerial Photograph: 26 August 2018
 NAIP2017 USDA FSA Imagery
 ESRI ArcGIS Basemap Layer

Figure 1. Oak Resource Map
 Sheet 2 of 2

VI. AVOIDANCE AND MINIMIZATION MEASURES

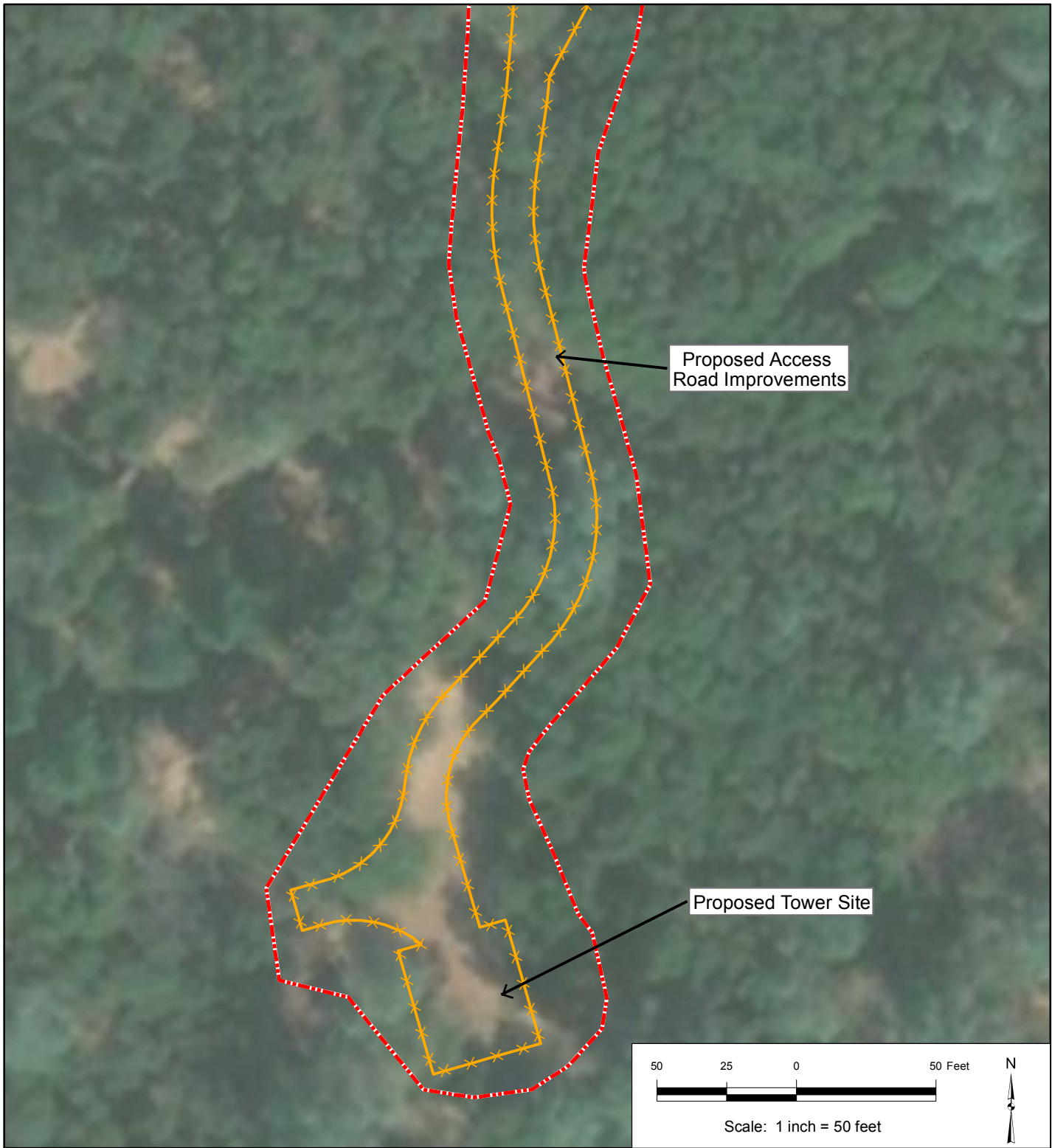
Oak woodlands occur on 80 acres of the 85-acre parcel. Trees will be retained outside the project limits on the parcel. Adequate buffer (the impacted oak woodland or existing cleared land) exists around retained trees to prevent construction impacts. The tree preservation measures below are recommended for further preservation of retained trees and should be initiated prior to and during construction. Oak preservation measures were developed for the project based on Matheny and Clark (1998).

Pre-construction

- The construction limits/RPZ shall be clearly defined with bright colored flagging or orange construction fencing prior to construction. Flagging and/or the fence shall remain in place until construction is complete. If fencing is infeasible due to the thick oak understory, brightly-colored flagging hung every 20 feet at eye-level is appropriate. The construction limits where flagging and/or fencing is to occur is shown in Figure 2. No construction activities shall occur outside the construction limits. Flagging or fencing shall be removed upon completion of the project to prevent wildlife entrapment and refuse left onsite.
- There shall be no driving, parking, or storage of supplies or equipment outside the construction limits in the RPZ.
- The canopy of trees to be removed shall be pruned where it is intertwined with the canopy of retained trees, or wherever felling of trees to be removed may damage the canopy of retained trees outside the construction limits. The canopy of retained trees that overhangs the area to be graded shall be pruned to the minimum height required for construction.
- Limb pruning of retained trees should be conducted by an arborist or tree worker that is ISA certified and licensed by the State of California for tree service. Pruning shall be conducted in accordance with American National Standard Institute (ANSI) A300 Pruning Standard and adhere to the most recent edition of ANSI Z133.1.
- Do NOT thin out the canopy or do any additional pruning outside the limits of construction/RPZ (Figure 2). It is more beneficial for a tree to have the most amount of foliage possible in order to promote new root growth.

During Vegetation Clearing

- Trees shall be felled inside the construction limits (Figure 2).



AT&T Frenchtown 2 - Butte Meadows Site
 CVL02082 Project
 El Dorado County, CA
 26 February 2020



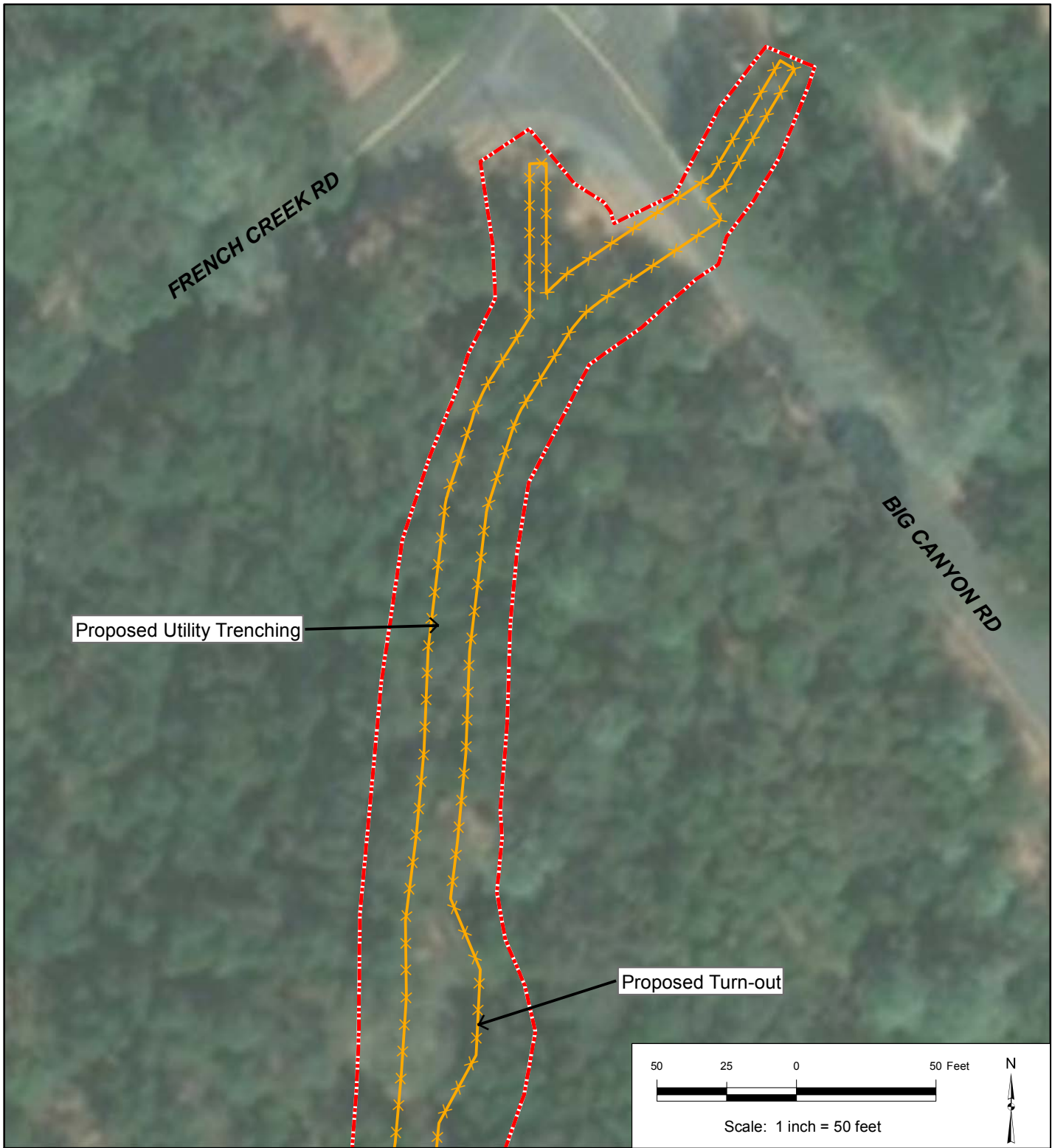


-  Biological Study Area (BSA; 0.99 ac)
-  Construction Limits (0.34 ac)

Figure 2. Project Limits
 Sheet 1 of 2

Aerial Photograph: 26 August 2018
 NAIP2017 USDA FSA Imagery
 ESRI ArcGIS Basemap Layer



AT&T Frenchtown 2 - Butte Meadows Site
 CVL02082 Project
 El Dorado County, CA
 26 February 2020

-  Biological Study Area (BSA; 0.99 ac)
-  Construction Limits (0.34 ac)

Aerial Photograph: 26 August 2018
 NAIP2017 USDA FSA Imagery
 ESRI ArcGIS Basemap Layer

Figure 2. Project Limits
 Sheet 2 of 2

VII. PROPOSED MITIGATION

The El Dorado County Oak Conservation Ordinance (No. 5061) and ORMP encourage on-site retention and discourages any unnecessary removal of oak trees by charging an in-lieu mitigation fee for the removal of oak trees and oak woodlands (El Dorado County 2017). The Project intends to mitigate for impacts to oak woodlands through payment of the in-lieu fees to the Oak Woodland Conservation Fund. The County ORMP and oak ordinance require a 1:1 mitigation ratio of impacted oak woodland for projects that impact up to 50% of onsite oak woodland. The Project will impact 0.38-acre of oak woodlands or, 49 % of the total oak woodlands within the BSA (0.01 % of oak woodlands within the entire parcel). The Project requires a 1:1 mitigation ratio for the loss of oak woodlands onsite at \$8,285 per acre impacted.

Table 1 below estimates in-lieu fees for impacts to oak woodlands onsite.

Table 1. Estimated ORMP In-Lieu Fees for Oak Woodlands

Oak Woodland Impacts (acres)	0.38
Oak Woodland Mitigation Ratio	1:1
Oak Woodland Fee Per Acre	\$8,285
Oak Woodland In-lieu Fee Total¹:	\$3,148

¹The ultimate fee determination will be made by El Dorado County.

VIII. LITERATURE CITED

- California Department of Fish and Wildlife (CDFW). 15 August 2019. California natural community list. Biogeographic Data Branch, CNDDDB, Sacramento, CA.
<https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>
- Council of Tree and Landscape Appraisers. 2000. Guide for Plant Appraisal. 9th ed. International Society of Arboriculture, Champaign, IL.
- El Dorado County. September 2017 (2017a). El Dorado County oak resources management plan. El Dorado County Community Development Agency, Long Range Planning Division.
- El Dorado County. October 2017 (2017b). Oak Resource Conservation Ordinance (No. 5061). El Dorado County Code of Ordinances, Section 130.39. Adopted by the Board of Supervisors October 24, 2017.
- Matheny, N. and J. R. Clark. 1998. Trees and development: A technical guide to preservation of trees during land development. International Society of Arboriculture, Champaign, IL.
- Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California vegetation, 2nd ed. California Native Plant Society, Sacramento, CA.
- Sycamore Environmental Consultants, Inc. 2019. Biological Resources Evaluation for the AT&T Frenchtown 2/Butte Meadows Project (CVL02082). Sacramento, CA.

IX. PREPARERS

Jeffery Little, Vice President, Sycamore Environmental. Sacramento City College, Sacramento, CA. Principal with over 26 years experience working with environmental review, permitting, biological, and cultural issues. Mr. Little serves as project manager during all phases of project development. He evaluates environmental and regulatory constraints to assist his clients determine realistic schedules of permits and entitlements. He prepares and manages CEQA/ NEPA documents and identifies the necessary technical studies during project evaluation. He develops project design recommendations to achieve regulatory compliance with the numerous applicable local, state, and federal environmental laws and regulations.

Responsibilities: Principal-in-Charge

Jessie Quinn, Ph.D., Ecology, University of California, Davis, CA. Over 20 years of experience in ecological and wildlife research, including over 7 years of experience as an environmental consultant. She serves as project manager and assistant project manager. She conducts botanical and wildlife surveys and provides technical support for wetland delineations. She prepares reports used in the CEQA/NEPA process that document resources, identify impacts, and recommends mitigation measures. She has managed and conducted wetland functional analyses, environmental risk assessments, and restoration design evaluations, and has received training for CA red-legged frog, NEPA, and habitat conservation planning. Her research has focused on the ecology and management of mammals, birds, and grasslands.

Responsibilities: Report preparation and review.

Kate J. Gazzo, M.S., Environmental Management, University of San Francisco, San Francisco, CA. Over 9 years of experience as an ecologist. Ms. Gazzo conducts habitat assessments, natural resource inventories, surveys for special-status wildlife, and wetland delineations. She assists with preparation of biological resource reports, permit applications, mitigation plans, and other documents used in CEQA/NEPA review. She has experience with ecological functional assessments, restoration and mitigation planning, land conservation, ecosystem service valuations, invasive species management, and water quality assessments.

Responsibilities: Fieldwork and report preparation.

Aramis Respoll, GIS Analyst/ CAD Operator. Over 20 years experience in drafting and spatial analysis using AutoCAD map and ArcGIS for public and private projects. He prepares figures for biological and permitting documents such as project location maps, aerial photograph exhibits, biological resource maps, wetlands/waters delineation maps, project impact maps, and other supporting graphics. Mr. Respoll provides geospatial analysis and support for projects involving geodesy, hydrology, watershed studies, project impact and mitigation analyses, listed species, and designated critical habitat. Primary experience evolved from conventional surveying and civil engineering practices to advanced GPS and GIS based technology.

Responsibilities: Figure preparation, spatial analysis.

APPENDIX A

Tree Table

Tree	Common Name	Scientific Name	DBH (Each Trunk in Inches)	Total DBH (Total Inches) ¹	Dripline	Height	Condition	Retained/ Impacted ²
1	Interior live oak	<i>Quercus wislizeni</i>	16, 15	31	14	16	Good	Retained
2	Interior live oak	<i>Quercus wislizeni</i>	15, 15	30	15	19	Good	Impacted
3	Interior live oak	<i>Quercus wislizeni</i>	15, 9, 8	32	20	22	Good	Impacted

¹ Data in this table is only presented for trees greater than 24 inches dbh. Trees greater than 6 inches were visually assessed during the field survey and measured to see if trees met size requirements for data collection.

² Retained trees will be left in place and shall be protected with proposed avoidance and minimization measures listed in Section VI of this report. Impacted trees will be impacted through construction activities such as grading and possibly removal.

APPENDIX B

Photographs



Photo 1. View looking southwest toward southern end of BSA/proposed tower location which is surrounded by interior live oak woodland. 19 June 2019.



Photo 2. View looking north from proposed access road at interior live oak trees located on the edges of the road. 19 June 2019.



Photo 3. View looking north from southern end of BSA. Proposed access road is located on the right side of photo. Interior live oak woodland dominates the edges of the access road. June 19 2019.



Photo 4. View looking east from northeast end of BSA toward Big Canyon Rd. Interior live oak woodland is present along the northeastern end of BSA. 19 June 2019.

APPENDIX C

Oak Resources Technical Report Checklist



COMMUNITY DEVELOPMENT SERVICES PLANNING AND BUILDING DEPARTMENT

2850 Fairlane Court, Placerville, CA 95667

Phone: (530) 621-5355 www.edcgov.us/Planning/

OAK RESOURCES TECHNICAL REPORT CHECKLIST

The following information is required for all Oak Resources Technical Reports consistent with Section 2.5 (Oak Resources Technical Reports) of the Oak Resources Management Plan (ORMP):

FORMS AND MAPS REQUIRED

Place a check (√) on the "Applicant" lines for those items completed. The planner receiving the application will check (√) the "County" line.

Check

(√)

Applicant County

1) Identify, locate, and quantify all oak resources on the property, as applicable:

a) Oak woodlands shall be mapped and assessed in accordance with the CDFG 2009 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* and subsequent updates, and the *List of Vegetation Alliances and Associations* (CDFG 2010) and subsequent updates;

b) Data collected for individual native oak trees and Heritage Trees shall include: location, species, trunk diameter (dbh), height, canopy radius, and general health and structural condition.

[See Appendix A and Figure 1](#)

2) Identify and quantify project-related impacts to oak resources

3) Measures identifying how specific trees and woodlands (or retained portions thereof) shall be protected during development and related work

[See Section VI. Proposed avoidance and minimization measures](#)

Check
(√)

Applicant County

4) Proposed actions to mitigate impacts to oak resources, consistent with the requirements included in the ORMP:

- a) For replacement planting, the report shall provide detail regarding the quantity, location, planting density, replacement tree size(s), and acorn/seedling source consistent with the definition of Replacement Planting included in the ORMP;
- b) For conservation easement placement/acquisition and/or land acquisition in fee title, the report shall provide documentation of easement placement on-site and/or documentation of easement or land acquisition off-site to the satisfaction of the County;
- c) For in-lieu fee payment, the report shall document the quantity of impacts (acreage of oak woodlands and/or total diameter inches of individual native oak trees/Heritage Trees) and the total in-lieu fee payment necessary (presented separately for oak woodlands, individual native oak trees, and Heritage Trees, where applicable).

5) Identification of responsible parties

n/a

6) Identification of maintenance, monitoring, and reporting requirements

n/a

7) Analysis of non-PCA conservation easement areas, where applicable

8) Site map(s) depicting:

[See Figure 1](#)

- a) location of all oak woodlands, individual native oak trees, and Heritage Trees;
- b) location of all proposed project-related improvements (including, but not limited to, the limits of grading, fuel modification/defensible space areas, and above- and below-ground infrastructure);
- c) Site map(s) shall also clearly identify impacted oak resources.

9) Planning and Building Department Summary Data Sheet of Oak Resources Impacts for Oak Tree/Oak Woodland Removal Permits.

[See next page](#)

SUPPLEMENTAL DATA FOR INDIVIDUAL NATIVE OAK TREES WITHIN OAK WOODLANDS:

The ORMP and Oak Resources Conservation Ordinance (No. 5061) was adopted on October 24, 2017 and the Board of Supervisors will review implementation within 12 months after adoption. The Board requested the following supplemental information:

10) Provide an inventory (species and size) of impacted Individual Native Oak Trees greater than 24 inches and less than 36 inches (dbh) in oak woodlands.

[See Appendix A.
Tree table](#)



COMMUNITY DEVELOPMENT SERVICES PLANNING AND BUILDING DEPARTMENT

2850 Fairlane Court, Placerville, CA 95667

Phone: (530) 621-5355 www.edcgov.us/Planning/

Summary Data Sheet of Oak Resources Impacts for Oak Tree/Oak Woodland Removal Permits

Description	Blue (<i>Quercus douglasii</i>)	California Black (<i>Quercus kelloggii</i>)	Canyon Live (<i>Quercus chrysolepis</i>)	Interior Live (<i>Quercus wislizeni</i>)	Oregon White (<i>Quercus garryana</i>)	Valley (<i>Quercus laobata</i>)	Oracle (hybrid) (<i>Quercus x morehus</i>)
Individual Native Oak Trees							
Quantity (number of trees) of individual native oak trees to be removed, by species	n/a	No oaks outside of oak woodland					
Quantity (number of trees) of individual native oak trees to be removed, greater than 24 inches and less than 36 inches (dbh), by species							
Total trunk diameter inches (dbh) to be removed*	n/a						
Heritage Trees							
Quantity (number of trees) of Heritage Trees to be removed, by species	0						
Total trunk diameter inches (dbh) to be removed*	0						
Oak Woodlands							
Total Acreage of existing oak woodlands**	0.78						
Acreage of existing oak woodlands to be removed	0.38						
Percentage of existing oak woodlands to be removed*	49%						

* Information used for purposes of calculating in-lieu mitigation fee payment.

** If Heritage Trees occur within oak woodlands, the area of impacted Heritage Tree(s) should be included in oak woodland acreage calculations.



Exhibit D to Staff Memo (08-07-2020)
K. Greenwood Email Comments
Project CUP19-0007
AT&T CAF II, Frenchtown 2 (Shingle Springs)

Gina Hamilton <gina.hamilton@edcgov.us>

Re: CUP19-0007 Frenchtown ATT Comments. Please DENY this project and demand BOS redo the Wireless Ordinance

Julie Saylor <julie.saylor@edcgov.us>

Thu, Aug 6, 2020 at 8:18 AM

To: krg@d-web.com

Cc: EDC COB <edc.cob@edcgov.us>, Robert Peters <robert.peters@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Jeanette Salmon <jeanette.salmon@edcgov.us>, Gina Hamilton <gina.hamilton@edcgov.us>, Debra Ercolini <debra.ercolini@edcgov.us>, Patricia Soto <patricia.soto@edcgov.us>, Rommel Pabalinas <rommel.pabalinas@edcgov.us>, Breann Moebius <breann.moebius@edcgov.us>

Your public comment sent on Aug 6, 2020 at 4:54 AM has been received for the AT&T CAF II, Frenchtown 2 (Shingle Springs) project (CUP19-0007) that is on the agenda for the Planning Commission's August 13, 2020 Meeting. Thank you.

--

Julie Saylor

Clerk of the Planning Commission

County of El Dorado

Planning and Building Department

2850 Fairlane Court

Placerville, CA 95667

(530) 621-5351

julie.saylor@edcgov.us

On Thu, Aug 6, 2020 at 8:07 AM EDC COB <edc.cob@edcgov.us> wrote:

FYI

Office of the Clerk of the Board

[El Dorado County](#)

[330 Fair Lane, Placerville, CA 95667](#)

530-621-5390

CONFIDENTIALITY NOTICE: This electronic communication with its contents may contain confidential and/or privileged information. It is solely for the use of the intended recipient(s), except as otherwise permitted. Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, or authorized to receive for the intended recipient, please contact the sender and destroy all copies of the communication. Thank you for your consideration.

----- Forwarded message -----

From: **Ken Greenwood** <krg@d-web.com>

Date: Thu, Aug 6, 2020 at 4:54 AM

Subject: CUP19-0007 Frenchtown ATT Comments. Please DENY this project and demand BOS redo the Wireless Ordinance

To:

Cc: edc cob <edc.cob@edcgov.us>, Brian Veerkamp <bosthree@edcgov.us>, John Hidahl <bosone@edcgov.us>, Lori Parlin <bosfour@edcgov.us>, Shiva Frentzen <bostwo@edcgov.us>, Sue Novasel <bosfive@edcgov.us>

Project CUP19-0007 ATT Frenchtown Wireless Telecommunication Facility (WTF) Tower

Dear Planning Commission and Planning Staff,

This WTF is another Gem from ATT to provide service to "Underserved Areas" and has once again been poorly reviewed by Planning Staff (even without the failures in the WTF Ordinance).

- The Project does not meet the required Findings for the CUP process as it is NOT compatible with and is in fact DETRIMENTAL to the rural nature of the neighborhood due to Aesthetic impacts on the surrounding developed (and undeveloped) parcels. It is too high above the surrounding vegetation and will be a "Life Sentence" eyesore to the neighbors.

Additionally, the El Dorado County WTF Ordinance (130.40.130) by which this Project is reviewed is outdated and does not have adequate minimum requirements to protect the Public Interest, particularly:

- minimum "fallover" setbacks (this WTF almost makes it, but not quite!),
- meaningful alternative site analysis,
- mandated third Party Review of applicant's Alternative Site Analysis
- inadequate noticing for interested and benefited parties.
- lack of meaningful visual simulation from adjacent residential structures within 1/2 mile (as those are Served and Impacted by the WTFs).
- No requirements to CLEARLY show setbacks on site plans, Noticing Maps and all illustrations (DISTANCE MATTERS!).

You cannot approve a Project using it as a STANDARD as it is inadequate for the above and other reasons described below.

For instance, the Staff Report: Public Comments/Outreach on Page 5 says:

Public Comments/Outreach: No formal public outreach was conducted by the County, and a public outreach plan was not required for this project pursuant to the County Zoning Ordinance. However, the project was duly noticed for a Planning Commission public hearing with a public notification range of 1,000 feet and a legal advertisement was published in applicable local newspapers. In addition, project notification was also posted on the Planning Department Planning Commission webpage. No physical sign posting is required for Conditional Use Permits.

Why didn't staff go "out of their way" to adequately Notice those impacted (or benefited) by this project? It really wouldn't be that tough to draw a line on a CAD and generate a mailing list and send them out. Big deal! How difficult is it to put a sign on the property along the Public (or Private) road that serves the area? Especially if the so-called "Benefit" is good for the huddled masses and reason ATT is getting a substantial Federal Subsidy to construct these WTFs? I would imagine you would want as many people to know about the proposal so they can support it if it is so beneficial and needed.

As this will be starkly visible (+/- 100 feet above the Oak canopy!!) to numerous neighbors greater than 1000 feet away and the useful service area is one mile, all those potentially benefiting or being impacted by the project should be notified. Therefore this project has not been thoroughly vetted by nearby residents and does not meet the intent of CEQA nor does it give people the ability to reasonably participate in the approval, environmental review or hearing process.

Solution? DENY this project, revise the WTF Ordinance and start over! The WTF Industry knows how to better design and review projects, but they thoroughly enjoy that our WTF

Ordinance doesn't force them to do so as it does cost just a bit more to do it right and let the Public see what the true extent of the Project is (as required by Law).

Additionally, the 1000' Notice Map (Exhibit F) is poorly done and does not clearly explain/illustrate a number of important factors important to full disclosure of the nature and extent of the Project (kind of a problem with CEQA Consistency). The 1000' zone goes off the borders and seems to not illustrate the Project Parcel correctly and/or consistent with the rest of the exhibits. Exhibit F does not show the approximate location of the Tower on the parcel so the Public can better understand the location of the actual tower to assist their understanding and evaluation of the project.

ENVIRONMENTAL REVIEW is inadequate as follows:

Alternative Analysis:

P 6. of Initial Study

Alternative Sites Analysis: AT&T considered six alternative sites for facilities to fill the identified coverage gap in this portion of El Dorado County. AT&T searched for, but did not find, feasible co-location opportunities in and around the coverage objective (Attachment 6). Property owners for three candidate sites did not respond to AT&T's letters of interest. Three property owners indicated interest in leasing space for the facility. However, based on viability, siting needs, and/or high visibility, parties were unable to determine an appropriate facility location on two of these properties. The third property was initially identified as the preferred site; however, after further discussion with the property owner, they elected not to encumber their property and passed on leasing the site to AT&T. AT&T's alternative sites analysis is included in Attachment 6.

This explanation DOES NOT protect the Public Health, Safety and Welfare as "shucks gee whiz, we really tried but they wouldn't answer our letters, so we didn't bother to call them, so guess it just doesn't work for us at this time..." What?? Seriously?? that's NOT and Alternative Analysis.

If El Dorado County truly wants "Broadband Access" for our residents, then we should be looking at EVERY site that shows promise and facilitate these "Needed for Public Safety" WTF's up to and including condemning the properties in the name of the "Public Good." Let's face it, that's what we are doing to the neighbors who will be facing a "Life Sentence" of looking at this Tower for the rest of their lives WITHOUT any monetary compensation from ATT or El Dorado County. Whereas the applicant in this and other projects receives a monthly lease payment and this person doesn't even have to live with the consequences he or she has poured upon his neighbors.

Sound absurd? Why yes it does, but that basically is the end product of these projects and the manner which El Dorado County processes these applications for WTF's.

Aesthetics:

P 8 of Initial Study (NOT CHECKED AS SIGNIFICANT??)

3.0 ENVIRONMENTAL IMPACTS: 3.1 AESTHETIC/VISUAL RESOURCES:

Would the proposal: 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. Substantially degrade the existing visual character or quality of the site and its surroundings?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? Setting:

Really? Minimally "a-c" and certainly "a" for the neighbors. You honestly determine these have no SIGNIFICANT impact on Aesthetics?

How can a "MONOPINE" be compatible with the "Oak Woodland" as it sticks out like a "SORE TREE" from the significantly smaller Oaks?

The Visual Simulations are adequate for traveled routes, but in no way demonstrate the visual impacts on adjacent and nearby Residential parcels. These are the people impacted the most by these "Stealth Monopines" that "no one will notice" (that are so "in your face" visible).

- Solution: Visual Simulations to illustrate how each nearby neighbor's views and vistas will be impacted. As of now, we have NO IDEA how the will dominate the Aesthetics of the residents nearby.

Another discussion from the "Alternative Site Analysis" is disturbing and absolutely untrue: The Monopine Tower design has been chosen to blend into the tree line and skyline and This site is the least intrusive location while filling AT&T's gap in coverage

This is equally absurd and is wishful thinking. The 100' portion of the tower ABOVE THE OAK CANOPY will be visible from adjacent residential properties!

P 16 Initial Study: Biological Resources:

(e) Conflict With Policies Protecting Biological Resources: Less Than Significant with Mitigation Incorporated. The proposed project would require the removal of 0.07 acre of oak woodland. None of the trees to be removed are considered heritage trees (as defined in the El Dorado County Zoning Ordinance Section 130.39.030). According to El Dorado County Ordinance Section 130.39.070.C, Oak Tree and Oak Woodland Removal Permits (Discretionary Development Projects), identifies mitigation options for development projects, including an inlieu fee payment based on the percent of on-site Oak Woodland impacted by the development. The proposed project would be conditioned to mitigate for impacts to oak woodlands through payment of the County's in-lieu fee. The current in-lieu fee is \$8,285 per acre, as specified in the County Oak Resources Management Plan (ORMP). The in-lieu fee cost for a 0.07-acre impact to oak woodland is \$579.95. In addition, the proposed project would incorporate Biological Resources Mitigation Measure BIO-2, below, to avoid potential impacts to oak trees in oak woodlands bordering the project site, which may be affected by project operation and project construction activities such as clearing, grading, and pruning for clearance requirements.

Seems the 0.07 Acre of Oak Woodland is a bit LOW as the minimum footprint of the 12' X 790' ROAD will be 0.19 Acre and will NEVER be "Oak Woodland" for at least the life of the project (which is how long?? Can't see info on that in the materials). Also wondering how is the 0.42

P 93 Alternative review: (ATT Study) (My underlines for emphasis)

Conclusion: Candidate Lippman, meets the FCC's mandated objectives for the targeted area of Frenchtown 2 and is the best choice for the surrounding area. The chosen location will meet and exceed the FCC's mandated coverage objectives with providing hi-speed broadband internet to homes in the Shingle Spring's Targeted area of El Dorado County. The Monopine Tower design has been chosen to blend into the tree line and skyline and the lower portion of the tower will be totally stealthed by the surrounding trees from all nearby dwellings. This site is the least intrusive location while filling AT&T's gap in coverage. Significant Coverage Gaps will be filled along all of the main corridors and the surrounding community. Impacts of oak woodlands will be impacted/removed for this location which AT&T intends to mitigate for impacts to oak woodlands through payment of an in-lieu fee. No special species or protected animals will be impacted per the completed BRE by Sycamore Environmental Consultants, Inc.

So the landowners NEVER responded to what probably looks like Junk Mail?? WOW, there's a surprise!!!! Perhaps another letter (via El Dorado County?? or a phone call or two could have made a difference. But I guess ONE letter is to be sufficient to deem a site infeasible. REALLY!! I don't think that meets anyone's definition of "Adequate Effort" to find out if they are truly interested. This is why I am suggesting an independent 3rd Party review of these poorly done "Alternative Locations" reports. They are a complete farce!

And the suggestion that The Monopine Tower design has been chosen to blend into the tree line and skyline and This site is the least intrusive location while filling AT&T's gap in coverage is equally absurd and is a discussion for the Aesthetics section. The 100' portion of the tower will be visible from adjacent

So please send the appropriate message to the WTF Industry and deny this project (due to inadequate Environmental Review, Failure to make CUP Findings regarding Aesthetics and incompatibility with the Neighborhood, and recognizing the inadequacy of the existing WTF Ordinance) and do the RIGHT THING! Too much time has gone by since 2016 and 2018 when all of these issues were identified, and have STILL not been resolved by the Planning Department upon direction by the Board of Supervisors.

Start today!

Thank you,

Ken Greenwood
Citizens for a New WTF Ordinance (CNNWTFO)
530-306-6390 (C) krg@d-web.com



Exhibit E to Staff Memo (08-07-2020)
L. Vancil Email Comments
Project CUP19-0007
AT&T CAF II, Frenchtown 2 (Shingle Springs)

Gina Hamilton <gina.hamilton@edcgov.us>

Re: Use Permit 20-0987/AT&T Frenchtown 2

Planning Department <planning@edcgov.us>

Fri, Aug 7, 2020 at 8:55 AM

To: Lisa Leatham-Vancil <lisa.vancil12@gmail.com>

Cc: Julie Saylor <julie.saylor@edcgov.us>, Robert Peters <robert.peters@edcgov.us>, Tiffany Schmid <tiffany.schmid@edcgov.us>, Jeanette Salmon <jeanette.salmon@edcgov.us>, Gina Hamilton <gina.hamilton@edcgov.us>, Patricia Soto <patricia.soto@edcgov.us>, Rommel Pabalinas <rommel.pabalinas@edcgov.us>, Breann Moebius <breann.moebius@edcgov.us>

Your public comment sent on Aug 7, 2020 at 8:28 AM has been received for the AT&T CAF II, Frenchtown 2 (Shingle Springs) project (CUP19-0007) that is on the agenda for the Planning Commission's August 13, 2020 Meeting. Thank you.

On Fri, Aug 7, 2020 at 8:28 AM Lisa Leatham-Vancil <lisa.vancil12@gmail.com> wrote:

Dear Planning Commissioners

I live at [1701 Saint Garth Way](#), which is right off of Big Canyon where this tower plans on being built. iThis would be a huge improvement to our community due to the lack of internet or use of cell phones in this area. I work from home and have struggled for 3 years with internet services for my job. When the power goes out we have no way to dial 911 if we have an emergency, as our landline phones do not work. We have an elderly person living with us and need these services so that we can get the quickest response here if needed. Please sincerely consider passing this use permit Frenchtown 2

Lisa Vancil