Exhibit L

MITIGATED NEGATIVE DECLARATION

FILE: CUP18-0007

PROJECT NAME: AT&T Tower, Gold Hill/Coloma

NAME OF APPLICANT: AT&T Mobility, c/o Complete Wireless Consulting, Inc.

ASSESSOR'S PARCEL NOs.: 089-010-75

SECTION: 30 **T:** 11N **R:** 10E,

LOCATION: Approximately 1,500 feet north of Thompson Hill Road near the intersection with Los Robles Road, in the Gold Hill/Coloma area.

☐ **GENERAL PLAN AMENDMENT:** **FROM:** **TO:**

☐ **REZONING:** **FROM:** **TO:**

☐ **TENTATIVE PARCEL MAP** ☐
SUBDIVISION (NAME):

☒ **SPECIAL USE PERMIT TO ALLOW:** Construction and operation of a telecommunication tower.

☐ **OTHER:**

REASONS THE PROJECT WILL NOT HAVE A SIGNIFICANT ENVIRONMENTAL IMPACT:

☐ **NO SIGNIFICANT ENVIRONMENTAL CONCERNS WERE IDENTIFIED DURING THE INITIAL STUDY.**

☒ **MITIGATION HAS BEEN IDENTIFIED WHICH WOULD REDUCE POTENTIALLY SIGNIFICANT IMPACTS.**

☐ **OTHER:**

In accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), State Guidelines, and El Dorado County Guidelines for the Implementation of CEQA, the County Environmental Agent analyzed the project and determined that the project will not have a significant impact on the environment. Based on this finding, the Planning Department hereby prepares this MITIGATED NEGATIVE DECLARATION. A period of thirty (30) days from the date of filing this mitigated negative declaration will be provided to enable public review of the project specifications and this document prior to action on the project by COUNTY OF EL DORADO. A copy of the project specifications is on file at the County of El Dorado Planning Services, 2850 Fairlane Court, Placerville, CA 95667.

This Mitigated Negative Declaration was adopted by the Planning Commission on May 23, 2019.

_____
Executive Secretary

COMMUNITY DEVELOPMENT SERVICES
PLANNING AND BUILDING DEPARTMENT

EL DORADO COUNTY

INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION FOR CONDITIONAL USE PERMIT CUP18-0007 AT&T TOWER, GOLD HILL/COLOMA

EL DORADO COUNTY
COMMUNITY DEVELOPMENT SERVICES, PLANNING AND BUILDING DEPARTMENT
INITIAL STUDY & PROPOSED MITIGATED NEGATIVE DECLARATION FOR CONDITIONAL USE PERMIT CUP18-0007
(AT&T Mobility, c/o Maria Kim, Complete Wireless Consulting, Inc.)

1.0 PROJECT INFORMATION

A. **Applicant: AT&T Mobility, c/o Maria Kim, Complete Wireless Consulting, Inc.**

B. **Owner:** Jason and Jennifer Bloxsom

C. **Staff Contact:** Tom Purciel, El Dorado County Planning and Building Department, 2850 Fairlane Court, Placerville, CA 95667, email: tom.purciel@edcgov.us

D. **Project Name:** Conditional Use Permit CUP18-0007 (AT&T Tower, Gold Hill/Coloma)

E. **Project Location:** Approximately 1,500 feet north of Thompson Hill Road near the intersection with Los Robles Road in the Gold Hill/Coloma area, Supervisory District 4

F. **Type of Application**: Conditional Use Permit

G. **Assessor's Parcel Number**: 089-010-75

H. **Parcel Size**: 50.0 Acres

I. **Lease area size:** Approximately 2,500 square feet (SF).

J. **Zoning:** Agricultural Grazing, 40-Acre (AG-40)

K. **General Plan Designation**: Agricultural Lands (AL)

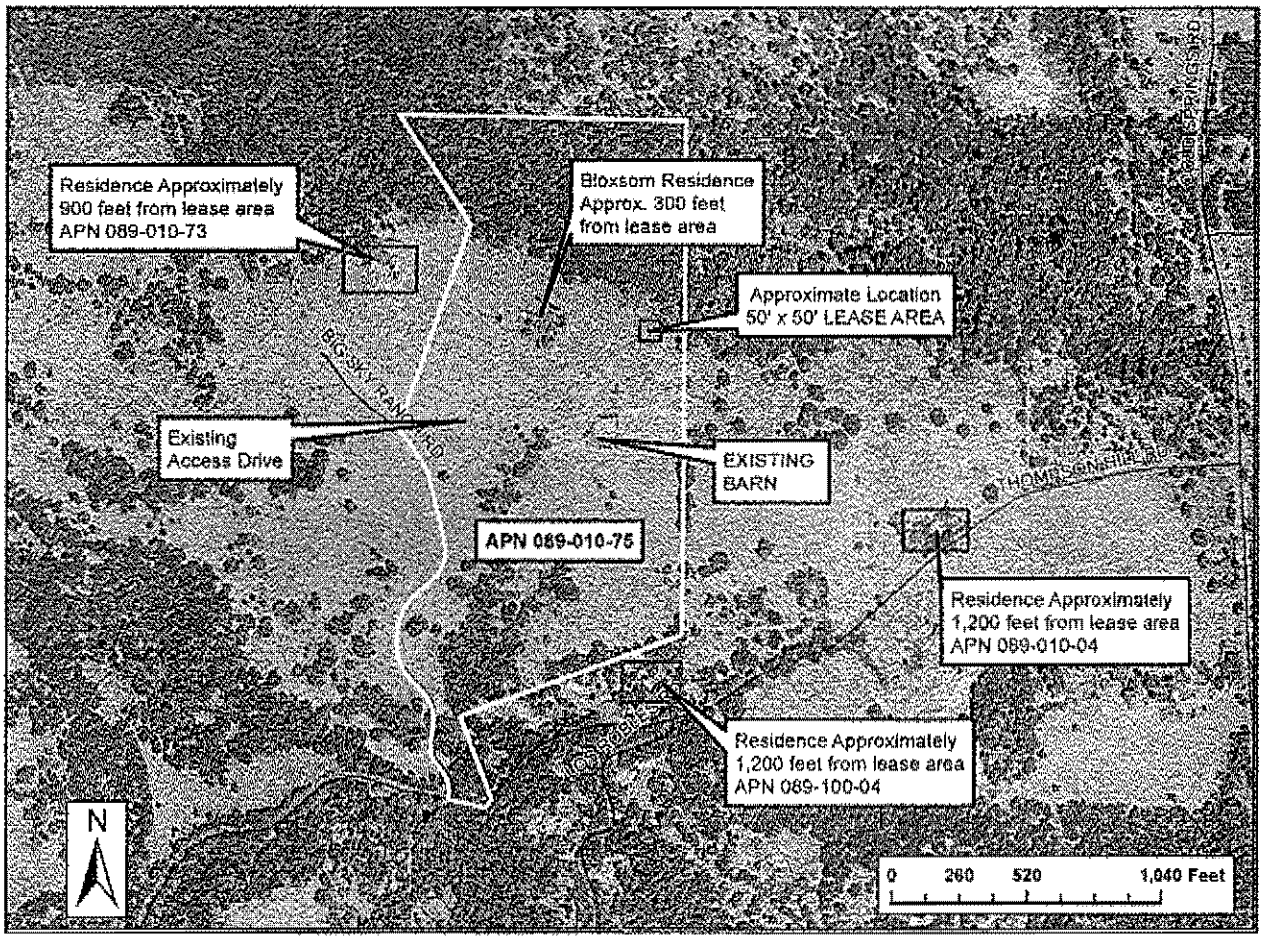
L. **Environmental Setting:** The project is located approximately 1,500 feet north of Thompson Hill Road near the intersection with Los Robles Road in the Gold Hill/Coloma area. The project lease area is located in the north central portion of a 50.0 acre parcel, approximately 123 feet from the east property line and accessed from Big Sky Ranch Road via an existing paved driveway. Interior site access will be provided via a separate existing gravel driveway. The area consists of gently rolling topography with non-native grassland, native oaks and grey pines. The site location's elevation is approximately 1,370 feet above sea level, with slopes ranging from 0 percent to 15 percent. No oak trees are proposed to be impacted by the project. Views of the proposed facility will be screened by existing native oaks and grey pines in the vicinity of the lease area and all equipment will be located within a 2,500 square foot fenced compound. Existing uses

include a single-family residence permitted in 1985, a barn permitted in 2010 and large animal grazing.

The Study Area is located in the North Fork American Hydrologic Unit (Hydrologic Unit Code 18020129). There are no potentially jurisdictional waters on site. The project parcel and proposed lease area is identified as flood zone "X (Unshaded)." The parcel is not within an Airport Compatibility Zone. The site is not located within an earthquake fault zone.

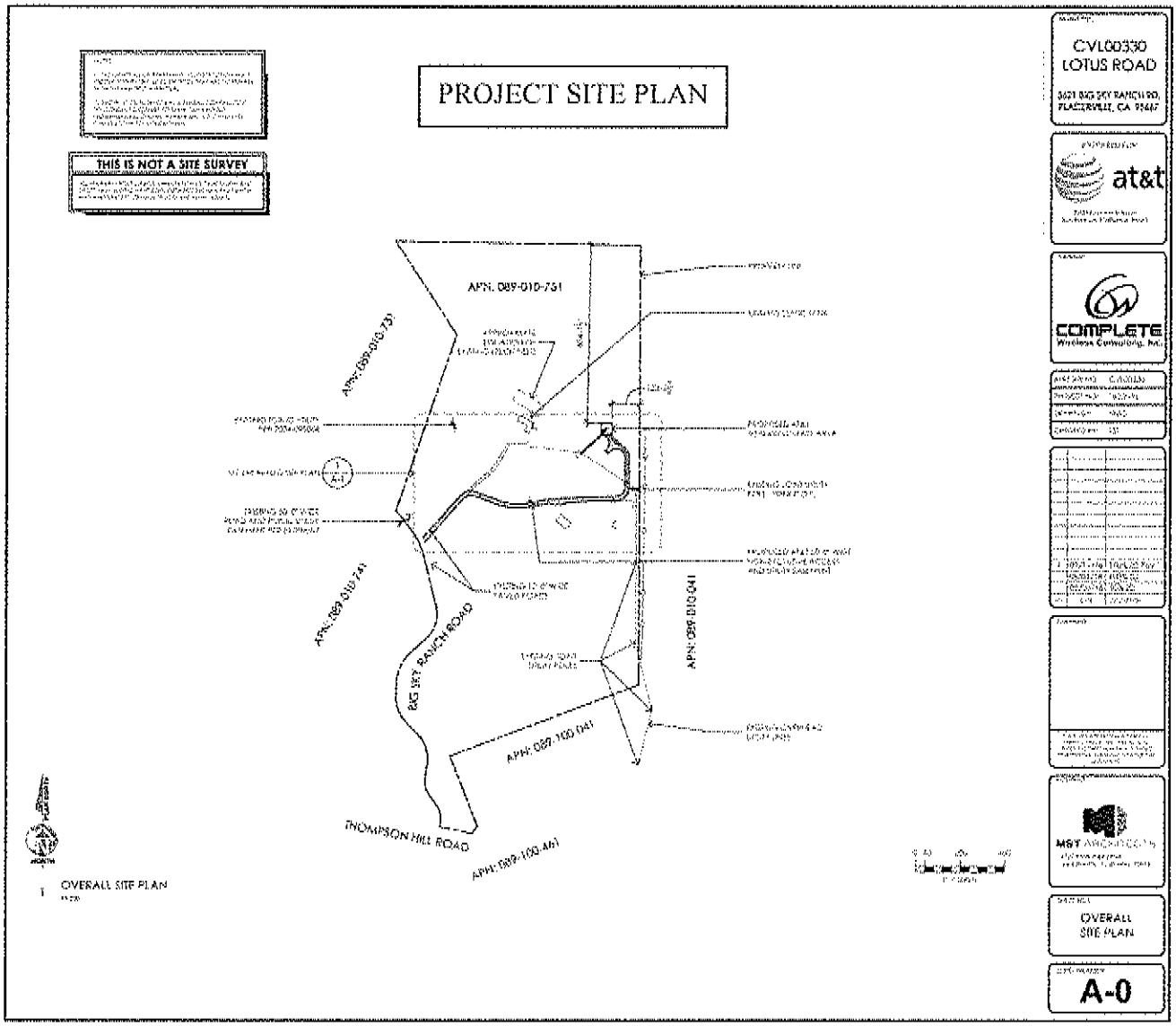
M. **Surrounding Land Uses**:

There is one rural residence located approximately 900 feet west of the project lease area. The onsite residence (Bloxsom) is located approximately 300 feet west of the lease area. While not in the immediate vicinity of the project, two additional rural residences are located more than 1,200 feet to the south and east of the project lease area.



N. **Project Description:** A request for a Conditional Use Permit to construct an unmanned wireless telecommunication facility located at 5621 Big Sky Ranch Road (APN 089-010-75) in the Gold Hill/Coloma area. The facility consists of a 115-foot high

stealth mono-broadleaf wireless communication facility, enclosed walk-in equipment shelter and emergency backup power generator located within a 50-foot x 50-foot, 2,500 square foot fenced lease area. The project lease area is located in the north central portion of a 50.0 acre parcel, approximately 123 feet from the east property line and accessed from Big Sky Ranch Road via an existing paved driveway. A proposed 6-foot wide AT&T utility easement consisting of a 128-foot long underground trench will connect the lease area to an existing electrical pole with overhead utilities. Access to the lease area and operation of the facility will not interfere with existing uses. Planning Commission approval of this facility is being requested pursuant to the requirements of Section 130.40.130 of the Zoning Ordinance (Communication Facilities).



The unmanned facility will provide wireless high speed internet and enhanced wireless network coverage 24 hours a day, 7 days a week. Maintenance workers will visit the site approximately twice per month. There will be minimal noise from the emergency backup

power generator and temporary construction noise associated with development of the facility and will not exceed noise thresholds established in the Zoning Ordinance. The generator will be operated once per week on weekdays between the hours of 8:00 a.m. and 7:00 p.m. for approximately 15 minutes for maintenance purposes and during emergency power outages.

Required fire protection services will be provided to the project site by the El Dorado County Fire Protection District (District) via an Out of Agency Service Agreement between AT&T and the District, as the project parcel is not located within District boundaries. To ensure fire protection services from the District are maintained in perpetuity, the property owner will be conditioned to obtain approval of an annexation of the project parcel into the District from El Dorado Local Agency Formation Commission (El Dorado LAFCO) within five years of project approval.

Co-Location: The tower will be built to allow for a maximum of two co-location opportunities. An alternative site (Attachment 3) located at 1242 Oro Loma Drive (APN 089-110-31) was initially considered for this project since it contains an existing communications facility previously authorized by the County under Special Use Permit No. S04-0041. This Special Use Permit authorized a 55-foot stealth monopole with enclosed antennas and a screened equipment shelter. However, use of this site was not chosen due to its proximity to several existing residences and residential accessory structures. Increasing the tower height to the minimum 100' height necessary to meet cell coverage objectives and modifying the facility from a stealth monopole to a stealth mono-broadleaf with external antennas could create significant visual impacts from public roadways and adjacent residences. This current site was identified as the most optimum in providing additional services and capacity to the area. It will also have the capacity to serve as a co-location site for additional future carriers.

Site Selection Process: The selection of a location for a wireless telecommunication facility that is needed to improve service and provide reliable coverage is dependent upon many factors, such as: topography, zoning regulations, existing structures, co-location opportunities, available utilities, access, and the existence of a willing landlord. Wireless communication utilizes line-of-sight technology that requires facilities to be in relative close proximity to the wireless handsets to be served. Each site is unique and must be investigated and evaluated on its own terms.

After establishing the need for the proposed facility, AT&T set out to identify the least intrusive means of achieving the necessary service objective. Upon review of the region AT&T found no existing wireless facility locations that would provide co-location within the search ring (Attachment 2). The majority of the search ring region is rural residential, so a new build tower was deemed essential.

Alternative Sites Analysis: In addition to the potential co-location opportunity discussed above, three alternative sites for a new build tower were identified that could potentially meet AT&T goals for service standards in the vicinity (Attachment 4). However, none of the three sites were selected due to significant constraints with each site including but not limited to

unwilling/unresponsive landowners, lack of serviceable road access and local topography (e.g. valleys/basins) requiring unreasonable tower height.

RF Emissions: An EMF/RF Report (Electromagnetic Fields/Radio Frequency) for the proposed wireless facility was prepared and submitted to the El Dorado County Planning Services. It demonstrates compliance with the latest FCC Wireless Facility Standards for emissions and exposure levels (Attachment 7).

Construction Schedule: The construction of the facility will be in compliance with all local rules and regulations, and will be limited to 8:00 am – 5:00 pm. The crew size will range from two to ten individuals. The construction phase of the project is anticipated to last approximately two to three months and will not exceed acceptable construction noise levels.

Lighting: The only lighting on the facility will be located by the entry door to the pre-fabricated shelter. The light will be shielded, down-tilted, and include a motion sensor.

Compliance with FCC standards: The proposed project will not interfere with any TV, radio, telephone, satellite, or other signals. Any interference would be against federal law and a violation of AT&T Wireless's FCC license (Attachment 6).

O. **Public Agency Approvals:** El Dorado County Community Development Services, El Dorado County Planning and Building Department, El Dorado County Fire District.

POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST SETTING

P. Environmental Factors Potentially Affected:

The environmental factors checked below could 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.

[ ] 4.1 Aesthetics	[ ] 4.2 Agriculture Resources	[ ] 4.3 Air Quality
[X] 4.4 Biological Resources	[ ] 4.5 Cultural Resources	[ ] 4.6 Geologic Processes
[ ] 4.7 Greenhouse Gas Emissions	[ ] 4.8 Hazards/Hazardous Material	[ ] 4.9 Hydrology/Water Quality
[ ] 4.10 Land Use	[ ] 4.11 Mineral Resources	[ ] 4.12 Noise
[ ] 4.13 Housing	[ ] 4.14 Public Services	[ ] 4.15 Recreation
[ ] 4.16 Transportation/Traffic	[ ] 4.17 Tribal Cultural Resources	[ ] 4.18 Utilities/Service Systems
[X] 4.19 Mandatory Findings of Significance		

2.0 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 in attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects: a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to applicable standards; and b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or Mitigation Measures that are imposed upon the proposed project, nothing further is required.

Signature: Tom Purciel Date: 4-17-19

Printed Name: Tom Purciel For: El Dorado County

Signature: Date: 4/17/19

Printed Name: Planner Pro Tem For: El Dorado County

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:

The project site area is characterized as primarily rural residential and agricultural. The 50.0 - acre project parcel is developed with limited agricultural uses and a single-family residence. The project site has an approximate elevation of approximately 1,370 feet above sea level. The site is not located within, or in the vicinity of, a scenic corridor or highway.

Impact Discussion:

(a) & (b) **Less Than Significant Impact.** The project parcel is located at Big Sky Ranch Road in the Gold Hill/Coloma area, California. The tower will be located in a portion of the parcel adjacent to a thicket of native oak and grey pine trees. The project site is not located along a designated state scenic-highway or an identified scenic area. The tower itself will be painted with flat brown non-glare paint and has been designed as a stealth mono-broadleaf, and will blend into its surrounding environment. The antenna and tower will be concealed by 13-foot diameter branches with broadleaf-style antenna socks. Antenna socks will be painted with flat green, non-glare paint. Supporting ground equipment within the lease area, including a walk-in equipment shelter and emergency backup generator, will be concealed from view by a combination of local

topography and an existing tree thicket adjacent to the site. To further ensure screening of supporting ground equipment, the project will be conditioned to require earth-tone slats be placed within the chain link fencing surrounding the lease area.

The nearest off-site residential dwelling from the proposed communication tower is approximately 900 feet west of the proposed lease area. The applicant supplied photo simulations of the proposed stealth mono-broadleaf tower as seen from different locations in the project area (Attachment 5).

(c) **Less Than Significant Impact.** The project site area and immediate vicinity is of rolling hills with thickets of native oaks and grey pine trees. A stealth mono-broadleaf is designed to resemble a tall broadleaf tree to blend in better with the surrounding environment. In this case, there are various broadleaf and conifer trees on the property. The stealth mono-broadleaf would be similar in size and shape to the surrounding trees. The location proposed will not substantially degrade the existing visual character of the site and is not expected to result in a significant impact to scenic vistas and to the area's visual aesthetics for the purpose of CEQA.

(d) **Less Than Significant Impact.** The tower will not be lighted, and the County discourages additional lighting in the area. Further, any future lighting would be subject to section 130.34.020 of the El Dorado County Zoning Code, which requires that all outdoor lighting shall be located, adequately shielded, and directed such that no direct light falls outside the property line, or into the public right-of-way. Proposed lighting for the equipment shed will meet these requirements. With the implementation of outdoor lighting regulations at the time of development, the proposed project would not create new sources of substantial lighting or glare that would generate a significant impact.

Mitigation Measure: None required.

3.2 AGRICULTURE RESOURCES:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Discussion:

(a) **No Impact.** The project site is zoned Agricultural Grazing (AG). The AG zone allows wireless communications facilities, with approval of a Conditional Use Permit pursuant to El Dorado County Zoning Code section 130.40.130.6.b (New Towers or Monopoles).

The site is not on "Farmland in El Dorado County" or "Choice Agricultural Land in El Dorado County" per General Plan Figure AF-1 and AF-2. The project site and adjacent parcels to the east and west are zoned Agricultural Grazing, 40-Acre (AG-40) which allows both residential and agricultural uses by right. Other adjacent zones include Estate Residential, 5-Acre (RE-5), Rural Lands, 20-Acre (RA-20) and Limited Agricultural, 20-Acre (LA-20). All of these adjacent zones allow residential uses and varying intensities of agricultural uses by right. The Project is compatible with and would not interfere with adjacent agricultural or residential uses.

(b) **No Impact.** The project site and surrounding parcels are zoned to allow varying intensities of agricultural uses. The Project would not conflict with any allowed agricultural uses. During a project hearing on April 10, 2019, the Agricultural Commission reviewed the project and confirmed that the project parcel is under a Williamson Act Contract. However, the Agricultural Commission found that the project would have no impact on this Williamson Act Contract.

(c) **No Impact.** The project site is not located in a timber resource zoning category such as Timber Mountain (TM), Timber Production (TPZ), or Resource Conservation (RC). The project site is also not classified as forest land, pursuant to California Public Resources Code Section 12220(g). Therefore, the proposed project would not conflict with, or cause the rezoning of, a timber resource zoning designation.

(d) **No Impact.** The project site is not considered forest land and therefore, the proposed project would not result in loss or conversion of forest land to a non-forest use.

(e) **No Impact.** The project site is not considered forest land. Although the site is zoned to allow agricultural uses, including animal grazing, the Project is compatible with and would not

interfere with existing or future agricultural uses. The Project would not result in loss or conversion farmland to a non-agricultural use or the loss or conversion of forest land to a non-forest use.

Mitigation Measure: None required.

FINDING: For this Agricultural category, the thresholds of significance have not been exceeded and no impacts would be anticipated to result from the project.

3.3 AIR QUALITY:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Setting:

El Dorado County's air pollution management is the responsibility of the El Dorado County Air Quality Management District (EDCAQMD), and the project is subject to federal, state, and local regulations. The wider Sacramento Region, including portions of El Dorado County, is currently designated nonattainment for federal 8-hour ozone and PM2.5, while it currently meets the National Ambient Air Quality Standards (NAAQS) for carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead.

The federal Clean Air Act (CAA) requires plans which identify how nonattainment areas will attain and/or maintain the NAAQS. The CAA requires the US EPA to review each plan and any plan revisions and to approve the plan or plan revisions if consistent with the CAA. Key elements of these plans include emission inventories, emission control strategies and rules, air quality data analyses, modeling, air quality progress and attainment or maintenance demonstrations. The Sacramento Air Quality Management District has a prepared attainment plans, available at: http://www.airquality.org/air-quality-health/air-quality-plans/federal-planning.

The CARB also prepares and submits to the EPA a State Implementation Plan (SIP) explaining how the state will attain compliance with Federal clean air standards. The EDCAQMD rules are federally enforceable as parts of the SIP, and are available at: https://www.arb.ca.gov/drdb/ed/cur.htm.

Impact Discussion:

(a) – (d) Less Than Significant Impact. Construction activities, a source of organic gas emissions, will be limited to the Stealth mono-broadleaf, related ground equipment, utilities and access drive. During construction, various diesel-powered vehicles and equipment would be in use. Construction diesel emissions are temporary, affecting an area for a period of days or perhaps weeks. Additionally, construction-related sources are mobile and transient in nature. Because of its temporary duration and the limited area of disturbance, health risks from construction emissions of diesel particulate would be less-than-significant impact. The project is not expected to create any significant amounts of fugitive dust, oxides of nitrogen, or reactive organic gases emissions.

The applicant is proposing a diesel back-up generator as part of the project. The standby generator is for emergency use only, therefore the project would not create on-going emissions. The ongoing project is not expected to generate any significant amounts of fugitive dust because the only soil disturbance would be some very minor excavation for the facility.

The effects of construction activities would be an increase in dust fall, and locally elevated levels of particulates downwind of construction activity. However, due to its limited construction and operational scope, the project would not conflict with or obstruct implementation of the applicable air quality plan.

Negligible amounts of emissions would be generated by construction equipment during site development activities, because of the limited amount of construction equipment and time needed to install the facility.

(e) Less Than Significant Impact. Potential standby generators are for emergency use only and will not result in objectionable odors affecting a substantial number of people. Otherwise, the proposed Stealth mono-broadleaf and ground related equipment will not use anything that will generate objectionable odors to the surrounding properties or area.

Mitigation Measure: None Required.

FINDING: The proposed project would not affect the implementation of regional air quality regulations or management plans. The proposed project would not be anticipated to cause substantial adverse effects to air quality, nor exceed established significance thresholds for air quality impacts.

3.4 BIOLOGICAL 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, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 or 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 and 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 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?	☐	☐	☐	☒

Impact Discussion:

The 50.0-acre project parcel consists of annual grassland, mixed oak woodland and mixed pine-chaparral. Although the general topography of the project parcel is moderate to steeply sloped, the lease area is located on gently rolling topography approximately 1,370 feet above sea level with slopes ranging from 0 percent to 15 percent.

Jurisdictional Waters of the United States, including Wetlands

Waters of the United States (U.S.), including wetlands, are broadly defined to include navigable waterways, and tributaries of navigable waterways, and adjacent wetlands. Although definitions vary to some degree, wetlands are generally considered to be areas that are periodically or permanently inundated by surface water or groundwater, supporting vegetation adapted to life in saturated soil. Jurisdictional wetlands are vegetated areas that meet specific vegetation, soil, and hydrologic criteria defined by the U.S. Army Corps of Engineers (USACE). The USACE holds sole authority to determine the jurisdictional status of waters of the U.S., including wetlands. Jurisdictional wetlands and Waters of the U.S. include, but are not limited to, perennial and intermittent creeks and drainages, lakes, seeps, and springs; emergent marshes; riparian wetlands; and seasonal wetlands. Wetland and waters of the U.S. provide critical habitat components, such as nest sites and reliable source of water for a wide variety of wildlife species.

The general topography of the project lease area is gently sloping from approximately 1,360 to 1,370 above mean sea level (MSL). The Project site is located on the north central portion of the parcel in an area of annual non-native grassland. The area is located in the North Fork American Hydrologic Unit (Hydrologic Unit Code 18020129). There are no wetlands or waters on the site.

Special-Status Species

Many species of plants and animals within the State of California have low populations, limited distributions, or both. Such species may be considered "rare" and are vulnerable to extirpation as the state's human population grows and the habitats these species occupy are converted to agricultural and urban uses. A sizable number of native species and animals have been formally designated as threatened or endangered under State and Federal endangered species legislation. Others have been designated as "Candidates" for such listing; still others have been designated as "Species of Special Concern" by the California Department of Fish and Wildlife (CDFW). The California Native Plant Society (CNPS) has developed its own set of lists of native plants considered rare, threatened or endangered. Collectively, these plants and animals are referred to as "special status species."

Limited, direct and indirect impacts to biological resources may result from the small amount of development enabled by the project, including the loss and/or alteration of existing undeveloped open space that may serve as habitat. California Environmental Quality Act Guidelines Section 15065 requires a mandatory finding of significance for projects that have the potential to substantially degrade or reduce the habitat of a threatened or endangered species, and to fully disclose and mitigate impacts to special status resources.

(a) Less Than Significant Impact with Mitigation Incorporated. The 2018 California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB: Coloma US Geological Survey [USGS] 7.5-minute series quadrangle and nine surrounding quadrangles) was reviewed to determine if any special status animal and plant species or habitats occur on the project site or in the project area.

According to a 2018 records search, 10 special-status plant species have a potential to occur on the project site. Based on literature review and field observations, only three of these identified species were determined to have a high potential to exist on the project site. However, no special-status plants were observed in the study area during a biological field survey conducted on August 13, 2018. The project is also not located in a Rare Plant Mitigation Area.

Biological Resources Mitigation Measure #1, below, requires a pre-construction botanical survey to confirm absence from the site and the implementation of avoidance or relocation measures in the event identified special-status plant species are detected. With this mitigation incorporated, impacts would be less than significant.

According to a 2018 records search, there is potential habitat for 12 listed and special-status wildlife species on or near the project site. While none of these species were observed during the on-site biological survey, based on literature review and field observations, two listed wildlife species could potentially occur on the project site.

Biological Resources Mitigation Measures #2 and #3, below, require pre-construction surveys to confirm absence of identified special status animal species from the site. These measures also require appropriate avoidance and/or relocation measures in the event special-status animal species are found. With incorporation of these mitigation measures, impacts would be less than significant.

The site provides habitat for birds listed under the Migratory Bird Treaty Act (MBTA) and/or regulated by the CA Fish and Game Code. Birds may nest in trees, shrubs, on the ground, and on structures within and adjacent to the site. The nests of raptors and most other birds are protected under the MBTA. Raptors are also protected by Section 3503.5 of the California Fish and Game Code, which makes it illegal to destroy any active raptor nest. Additionally, the USFWS and CDFW identified a number of avian species of conservation concern that do not have specific statutory protection. Avian species forage and nest in a variety of habitats throughout El Dorado County. While the trees and vegetation on and surrounding the site may provide nesting and foraging habitat for raptors and other protected birds, according to a records search and a biological field survey conducted on October 9, 2017, no active bird nests were observed on the site.

Biological Resources Mitigation Measure #4, below, requires pre-construction bird surveys to confirm absence from the site and the implementation of avoidance measures in the event these bird species are detected. With this mitigation incorporated, impacts would be less than significant.

(b) and (c) No impact. The project site is located in a rural residential and agricultural area and does not have any streams, creeks or riparian habitat in the area of the project footprint. Granite Creek is approximately 0.25 miles south of the project site and the project will not affect the Creek or associated riparian habitat. Although the project parcel contains potentially jurisdictional waters of the U.S as defined by Section 404 of the Clean Water Act, the project footprint is not located within proximity of federally protected wetlands.

(d) Less Than Significant with Mitigation Incorporated. The proposed ground equipment of the communication facility and the Stealth mono-broadleaf will be located within a 2,500 square foot fenced area and include a 20-foot wide access drive off of Big Sky Ranch Road. The fenced area will not substantially interfere with native wildlife migration in the area. The project site area is characterized as primarily rural residential and agricultural, with disturbed and vegetated areas. It is not considered a wildlife migration corridor, and therefore is not expected to result in impacts to wildlife migration corridors. The site is not located within an Important Biological Corridor identified by the El Dorado County General Plan. The proposed project will not cause significant reduction in the ecological functions of the site because the habitat in the area are already disturbed by human activities.

The construction of new communication towers creates a potentially significant impact on migratory birds covered by the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and related Code of Federal Regulations designed to implement the MBTA, the Endangered Species Act and Bald and Golden Eagle Act. The guidelines are based on the best information available at this time, and are the most prudent and effective measures for avoiding bird strikes at monopoles. Some of the guidelines are:

a. New facilities should be collocated on existing towers or other existing structures.
b. Towers should be less than 200 feet above ground level
c. Towers should be freestanding (i.e., no guy wires)
d. Towers and attendant facilities should be sited, designed and constructed so as to avoid or minimize habitat loss within and adjacent to the monopole "footprint".
e. New towers should be designed structurally and electrically to accommodate the applicant/licensee's antennas and antennas for at least two additional users (minimum of three users for each monopole structure.
f. Security lighting for on-ground facilities and equipment should be down-shielded to keep light within the boundaries of the site.
g. Monopoles no longer in use or determined to be obsolete should be removed within 12 months of cessation of use.

The project is consistent with the U.S. Fish and Wildlife Service interim guidelines above. The footprint of the proposed lease area would not encroach onto any environmentally sensitive habitat.

Although the proposed project will be in a relatively small area of the project site, there is the potential for impact to the nesting of migratory and raptors in the project area. Biological Resources Mitigation Measure #4, below, is therefore included to avoid potential impacts.

(e) Less than Significant Impact. The 50.0-acre parcel containing the lease site and access drive contains 0.49 acres of mixed oak woodland habitat located along Big Sky Ranch Road, near the intersection with Thompson Hill Road. No oak trees are proposed for removal and there is no proposed construction or soil disturbance along Big Sky Ranch Road. However, some lower limb pruning may be needed for vehicular access to the site. There will be a less than significant impact.

(f) No Impact. This site is not located within an approved habitat conservation plan area.

Mitigation Measure #1 (Biological Resources):

Rare Plant Survey:

Prior to issuance of grading or building permits, a qualified biologist shall conduct a botanical survey during the blooming period of identified rare plant species having the potential to occur on the project site (approximately May-June). If no special-status plants are observed, a letter report shall be prepared to document the survey.

If special-status plants are identified within areas of proposed soil disturbance, the biologist shall prescribe methods of avoidance during project construction to the greatest extent feasible. If the plants cannot be avoided, the biologist shall prescribe methods of relocating the plants and/or the seedbank to a suitable habitat near the project site.

Pre-construction worker awareness training shall be conducted alerting workers to the presence and protections for special-status plants.

Monitoring Requirement: This mitigation measure shall be noted on grading and construction plans. The Planning and Building Department shall verify the completion of survey prior to issuance of grading and building permits.

Monitoring Responsibility: El Dorado County Planning and Building Department.

Mitigation Measure #2 (Biological Resources):

Special-Status Bat Species:

A qualified biologist shall conduct a pre-construction survey within 14 days prior to clearing or grading operations and removal of trees. If no bats are observed, a letter report shall be prepared

to document the survey. If construction does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to starting work.

If special-status bat species are present and roosting on or within 100 feet of the Study Area, then the biologist shall establish an appropriate buffer around the roost site. At minimum, no trees shall be removed until the biologist has determined that the bat is no longer roosting in the tree. Additional mitigation measures for bat species, such as installation of bat boxes or alternate roost structures, would be recommended only if special-status bat species are found to be roosting within the project area.

Pre-construction worker awareness training shall be conducted alerting workers to the presence of and protections for various bat species.

Monitoring Requirement: This mitigation measure shall be noted on grading and construction plans. The Planning and Building Department shall verify the completion of survey prior to issuance of grading and building permits.

Monitoring Responsibility: El Dorado County Planning and Building Department.

Biological Resources Mitigation Measure #3 (Biological Resources):

Western Pond Turtle:

A qualified biologist shall conduct a pre-construction survey within 14 days prior to ground disturbing activities, including vegetation clearing. If no western pond turtles are observed, a letter report shall be prepared to document the survey. If construction does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to starting work.

If western pond turtles are found, a qualified biologist shall conduct an environmental awareness training to all construction personnel including but not limited to identification of the western pond turtle, required practices before the start of construction, general measures to conserve the species as they relate to the project, penalties for non-compliance and boundaries of the project site and permitted disturbance zones. Supporting materials containing training information should be prepared and distributed. Upon completion of training, all construction personnel shall sign a form stating they have attended the training and understand required protection measures. Evidence of this instruction shall be kept on-site during project construction activities.

If western pond turtles are found, a qualified biologist shall also be present on site when increased traffic is occurring in the southern portion of the site, especially in the vicinity of the Granite Creek road crossing, for the purpose of relocating any western pond turtles found within the construction footprint to a suitable adjacent habitat outside the construction zone.

Monitoring Requirement: This mitigation measure shall be noted on grading and construction plans. The Planning and Building Department shall verify the completion of survey prior to issuance of grading and building permits.

Monitoring Responsibility: El Dorado County Planning and Building Department.

Mitigation Measure #4 (Biological Resources):

Migratory and Special-Status Bird Species:

All vegetation clearing including removal of trees and shrubs shall be completed between September 1 and February 14, if feasible. If vegetation removal and grading activities begin during the nesting season (February 15 to August 31), a qualified biologist shall conduct a pre-construction survey of the project footprint for active nests. Additionally, the surrounding 500 feet shall be surveyed for active raptor nests where accessible. The pre-construction survey shall be conducted within 14 days prior to commencement of ground-disturbing activities. If the pre-construction survey shows that there is no evidence of active nests, a letter report shall be prepared to document the survey. If construction does not commence within 14 days of the pre-construction survey, or halts for more than 14 days, an additional survey is required prior to starting work.

If nests are found and considered to be active, the project biologist shall establish buffer zones to prohibit construction activities and minimize nest disturbance until the young have successfully fledged. Buffer width will depend on the species in question, surrounding existing disturbances, and specific site characteristics, but may range from 20 feet for some songbirds to up to 500 feet for raptors. If active nests are found within any trees slated for removal, then an appropriate buffer shall be established around the trees and the trees shall not be removed until a biologist determines that the nestlings have successfully fledged or until the nest is no longer active. In addition, a pre-construction worker awareness training shall be conducted alerting workers to the presence of and protections for the active avian nests. If construction activities are proposed to begin during the non-breeding season (September 1 through January 31), a survey is not required and no further studies are necessary.

Monitoring Requirement: This mitigation measure shall be noted on grading and construction plans. The Planning and Building Department shall verify the completion of survey prior to issuance of grading and building permits.

Monitoring Responsibility: El Dorado County Planning and Building Department.

Finding: With mitigation measures incorporated, impacts to biological resources will be less than significant.

3.5 CULTURAL RESOURCES:

Would the proposal:	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 as defined in §15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Impact Discussion:

(a) – (d) Less Than Significant Impact. Cultural resources include prehistoric and historic period archaeological sites; historical features, such as rock walls, water ditches and flumes, and cemeteries; and architectural features. Cultural resources consist of any human-made site, object (i.e., artifact), or feature that defines and illuminates our past. A complete records search of the California Historic Resources Information System (CHRIS) maps for cultural resource site records and survey reports in El Dorado County within the proposed project area revealed that the proposed area contains zero (0) prehistoric-period resource(s) and one (1) historic-period cultural resource(s). Additionally, two (2) cultural resources study reports were on file for a portion of the proposed project area. However, a 2018 project-specific cultural resources investigation, based on archival document review and a field survey completed on July 6, 2018 by Archaeological Resources Technology found that the project site contained no historic, prehistoric or tribal cultural resources and that there is a low likelihood of discovering such resources on the project site.

Mitigation Measures: None Required.

FINDING: As conditioned and with adherence to El Dorado County Code of Ordinances (County Code), for this Cultural Resources category, impacts would be anticipated to be less than significant.

3.6 GEOLOGIC PROCESSES:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☒	☐
1. 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.	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal system where sewers are not available for the disposal or wastewater?	☐	☐	☐	☒

Impact Discussion:

a.1) - a.4) Less Than Significant Impact. No seismic impacts, including seismic-related ground failure impacts are anticipated since no rupture of a known earthquake fault exists in the project area. Further, the proposed project would be consistent with El Dorado County General Plan Objective 6.3.2, to address county-wide seismic hazards.

Like most of north central California, the site can be expected to be subjected to strong seismic ground shaking at some future time. Accordingly, the proposed wireless communications facility extension would be designed and installed in accordance with building code requirements. Because the project appears to be located such that the probability of significant ground shaking is low, and because any structures that are built during the course of the project will be designed and installed in accordance with building code standards for the appropriate Seismic Hazard Zone, potential geologic impacts would be less than significant. Due to the relatively level proposed project area, minimum disturbance of the project and existing vegetation on the site, the potential for a land slide is unlikely.

(b) – (d) Less Than Significant Impact. The project does not involve large amounts of soil disturbance that could result in significant soil erosion impacts. The construction activities would result in a land disturbance of less than one acre and therefore are not expected to require a Storm water Pollution Prevention Permit (SWPPP) from State Water Resources Control Board prior to construction. Due to the relatively small amount of soils disturbance required for construction, erosion potential will be minimal. Due to the relatively small amount of soils disturbance required for construction, the potential for unstable soils, liquefaction, and expansion is minimal. Further, the project would be required to comply with applicable portions of the building code, which would offset potential impacts resulting from expansive soils.

(e) No Impact. The project does not require the use of septic systems.

Mitigation Measure: None required.

FINDING: A review of the soils and geologic conditions on the project site determined that the project would not result in a substantial adverse effect. All grading activities would be required to comply with the El Dorado County Grading, Erosion Control and Sediment Ordinance which would address potential impacts related to soil erosion, landslides and other geologic impacts. Future development would be required to comply with the UBC which would address potential seismic related impacts. For this Geology and Soils category, impacts would be less than significant.

3.7 GREENHOUSE GAS EMISSIONS:

Would the proposal:	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?	☐	☐	☒	☐

Impact Discussion:

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other significant changes in climate (such as precipitation or wind) that last for an extended period of time. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. Global surface temperatures have risen by 0.74°C ± 0.18°C over the last 100 years (1906 to 2005). The rate of warming over the last 50 years is almost double that over the last 100 years.[1] The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO2) and other greenhouse gases (GHGs) are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.[2]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The following are the gases that are widely seen as the principal contributors to human-induced global climate change:[3]

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur Hexafluoride (SF_6)

[1] Intergovernmental Panel on Climate Change (IPCC), 2007. *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the IPCC.*

[2] The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse allows heat from sunlight in and reduces the amount of heat that escapes, greenhouse gases like carbon dioxide, methane, and nitrous oxide in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of greenhouse gas results in global warming, the *naturally occurring* greenhouse effect is necessary to keep our planet at a comfortable temperature.

[3] The greenhouse gases listed are consistent with the definition in Assembly Bill (AB) 32 (Government Code §38505).

Over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming, while manmade GHGs include naturally-occurring GHGs such as CO_2, methane, and N_2O, some gases, such as HFCs, PFCs, and SF_6 are completely new to the atmosphere.

Section 15064.4 of the CEQA Guidelines sets forth guidance for determining the significance of Impacts from Greenhouse Gas Emissions. The guidelines allow impacts from a particular project to be described quantitatively or qualitatively and direct that impacts should be evaluated in consideration of existing environmental setting, applicable thresholds of significance, and compliance with regulations and requirements adopted to implement the mitigation of greenhouse gas emissions.

Section 15064 (h)(3) of the CEQA Guidelines specifies that a project's contribution to a cumulative effect may be found 'not cumulatively considerable' if the project will comply with the requirements in a previously approved plan or mitigation program, including plans or regulations for the reduction of greenhouse gas emissions. El Dorado County has not adopted a plan or mitigation program for the reduction of greenhouse gases as of the publication of this study. Likewise, it has not adopted thresholds of significance for evaluating greenhouse gas emissions. However, the General Plan provides applicable county-wide goals and policies aimed at improving energy efficiency, improving transportation efficiency, and reducing air emissions, which could reduce or sequester GHGs, including Goal TC-1, Policies TC-1p and TC-1q, Goal 5.6, Objective 5.6.2, and Policies 5.6.2.1 and 5.6.2.2.

(a) **Less Than Significant Impact.** The proposed project is a communication tower that would not significantly contribute to the existing greenhouse gas inventory for El Dorado County. Short term construction GHG emissions will occur during installation of the tower and ground equipment. Standby generators will only be used during power outages and for short duration during testing. Vehicle trips will be associated with very limited construction and routine maintenance. GHG emissions generated by the development and vehicle trips would be of an extremely limited scope and duration. The GHG emissions would be negligible and the impact would therefore be less than significant.

(b) **Less Than Significant Impact.** The El Dorado County General Plan establishes numerous policies relative to greenhouse gases. The everyday operation of the proposed communication facility would not generate greenhouse gas emissions. Due to the short term construction, limited vehicle trips to the site and monthly testing of the standby generator, the anticipated increase in emissions would not conflict with the applicable with policies adopted for the purpose of reducing GHG emissions.

Mitigation Measure: None required.

FINDING: The project would result in less than significant impacts to greenhouse gas emissions. For this Greenhouse Gas Emissions category, there would be no significant adverse environmental effect as a result of the project.

3.8 HAZARDS AND HAZARDOUS MATERIALS:

Would the proposal:	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 environmental 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 schools?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites complied 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 for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h. Expose people or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

Impact Discussion:

a) Less Than Significant Impact. The project is proposed to utilize a standby diesel generator for back-up power, and would include a separate diesel tank. The storage of diesel fuel is required only for emergency purposes during a power outage and will not be routinely used or transported. The amount of diesel fuel stored would be similar to that for a residential use. Storage and handling of diesel fuel, or any other chemicals or hazardous materials, would be subject to a Hazardous Materials Business Plan, administered by the El Dorado County Public Health Department at the time of development of the project. The plan would include an inventory of hazardous materials and chemicals handled or stored on the site, an emergency response plan, and a training program in safety procedures.

Construction activities associated with the development of the proposed project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. In the event of an accidental release, construction personnel who are experienced in containing accidental releases of hazardous materials will likely be present to contain and treat affected areas in the event a spill occurs. If a larger spill were to occur, construction personnel would generally be on-hand to contact the appropriate agencies. Hazardous materials used during construction would ultimately be disposed of by a licensed hazardous waste transporter at an authorized and licensed disposal facility or recycling facility.

Radiofrequency (RF) Emissions

Radiofrequency (RF) radiation emanates from antenna on cellular towers and is generated by the movement of electrical charges in the antenna. The energy levels it generates are not great enough to ionize, or break down, atoms and molecules, so it is known as "non-ionizing" radiation.

The Federal Communications Commission (FCC) is the government agency responsible for the authorization and licensing of facilities such as cellular towers that generate RF radiation. For guidance in health and safety issues related to RF radiation, the FCC relies on other agencies and

organizations for guidance, including the EPA, FDA, the National Institute for Occupational Safety and Health (NIOSH) and OSHA, which have all been involved in monitoring and investigating issues related to RF exposure. The FCC has developed and adopted guidelines for human exposure to RF radiation using the recommendations of the National Council on Radiation Protection and Measurements (NCRP) and the Institute of Electrical and Electronics Engineers (IEEE), with the support of the EPA, FDA, OSHA and NIOSH. According to the FCC, both the NCRP exposure criteria and the IEEE standard were developed by expert scientists and engineers after extensive reviews of the scientific literature related to RF biological effects. The exposure guidelines are based on thresholds for known adverse effects, and they incorporate wide safety margins. In addition, under the National Environmental Policy Act (NEPA) the FCC is required to evaluate transmitters and facilities for significant impacts on the environment, including human exposure to RF radiation. When an application is submitted to the FCC for construction or modification of a transmitting facility or renewal of a license, the FCC evaluates it for compliance with the RF exposure guidelines, which were previously evaluated under NEPA. Failure to show compliance with the FCC's RF exposure guidelines in the application process could lead to the additional environmental review and eventual rejection of an application. The proposed telecommunication facility is subject to the FCC exposure guidelines, and must fall under the FCC's American National Standards Institute (ANSI) public limit standard of .58 mW/cm2.

Finally, it should be noted that Section 704 of the Telecommunication Act of 1996 states that "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions." Because the proposed facility would operate under federally mandated limits on RF radiation for cellular towers and is regulated by the FCC in this respect, the County may not regulate the placement or construction of this facility based on the RF emissions.

An EMF/RF Report (Electromagnetic Fiels/Radio Frequency) has been prepared and submitted for the project. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields. It demonstrates compliance. Should the facility's emissions exceed FCC standards, the applicant would be responsible for the cost of additional tests and corrective measures to establish compliance with FCC standards. These County development standards would be reflected as conditions of approval in the use permit.

The applicant has also provided a Hazardous Materials and Emissions Questionnaire to the County If materials exceed applicable thresholds outlined in the Hazardous Materials Release Response Plans and Inventory Law of 1985 (The Business Plan Act), a Hazardous Materials Business Plan would need to be obtained. The plan, when implemented, would address potential impacts associated with the accidental spill or release of chemicals and/or hazardous materials used during operations.

b) Less Than Significant Impact. See discussion under 3.8(a), above.

c) Less Than Significant Impact. There are no schools within one-quarter mile of the project site. As discussed above, the proposed project may require the use of potentially hazardous materials during construction and operation of the telecommunication facility, including the storage of diesel fuel. Standard construction practices and implementation of the Business Plan Act, would minimize the potential for accidental release of hazardous materials within proximately to or on the school site to a less than significant level.

d) Less Than Significant Impact. A review of regulatory agency databases, which included lists of hazardous materials sites compiled pursuant to California Government Code Section 65962.5, did not identify contamination sites as being located within, or in the vicinity of, the project site.

e) No Impact. No public use airports have been identified to be located within the vicinity of the project site. The proposed project is located outside the compatibility zones for the area airports, and therefore, would not result in a safety hazard to people working and residing on the project site.

f) No Impact. No known private airstrips have been identified within two miles of the project site. As a result, no safety hazards associated with airport operations are anticipated to affect people working or residing within the project site.

g) No Impact. The proposed project is an unmanned facility, so no evacuation and/or emergency response plans are necessary. The proposed project does not include any actions that physically interfere with any emergency response or emergency evacuation plans. Development of the proposed project would add a small amount of trips onto the area roadways; however, area roadways and intersections would continue to operate at an acceptable level of service. In the event future construction activities require work to be performed in the roadway, appropriate traffic control plans would be prepared in conjunction with County requirements.

h) No impact. The proposed use is unmanned and will not subject additional people to risk of fire.

Mitigation Measure: None required

3.9 HYDROLOGY AND WATER QUALITY:

Would the proposal:	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?	☐	☐	☐	☒
b. 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 (e.g., the production rate of preexisting nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood hazard area as mapped by Federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk or loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Impact Discussion:

a) & b) No Impact. The project does not require the use of water and would not create any water discharges.

(c) - f) Less Than Significant Impact. An equipment shelter is proposed within the 2,500-square foot fenced lease area. The proposed area to be developed, including the Stealth mono-broadleaf location and the ground equipment area, would not affect local drainage patterns or contribute to or create additional runoff or substantially degrade water quality. The 20-foot wide access easement will not create any significant impact to drainage patterns or create significant runoff.

(g) - i) No Impact. The Federal Emergency Management Agency (FEMA) is responsible for mapping areas subject to flooding during a 100-year flood event (i.e., 1 percent chance of occurring in a given year). According to floodplain mapping of the project area, the project site is located within the X zone (Unshaded). The X zone (Unshaded) is defined by FEMA as areas of minimal flood hazard from the principal source of flood in the area and determined to be outside of the 0.2 percent annual chance floodplain.

(j) No Impact. The project site has an approximate elevation of 1,370 feet above sea level. Based on the geographic location of the project site above sea level and situation along a ridgeline, it will not be subject to inundation by seiche, tsunami, or mudflow.

Mitigation Measures: None required.

FINDING: The proposed project would not expose the area to hazards relating to the use, storage, transport, or disposal of hazardous materials. For this Hazards and Hazardous Materials category, impacts would be less than significant.

3.10 LAND USE:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☒	☐
b. Conflict with an applicable land use plan, policy, or regulations of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Impact Discussion:

The project parcel is zoned AG-40. The Stealth mono-broadleaf tower far exceeds the necessary setback requirements from all property lines.

Once constructed and operational, the communications facility would provide 24-hour service to customers seven days a week. Apart from initial construction activity, no personnel will be stationed at the site. Routine maintenance and inspection of the facility would occur twice a month during normal business hours. No water or sewer service is required as the site would be unmanned.

(a) Less Than Significant Impact. No new parcels or substantial development would result from this project. The project would not divide any established community.

(b) Less Than Significant Impact. The proposed project was reviewed for consistency with the zoning code and General Plan, and is consistent with both. The proposed Stealth mono-broadleaf tower is conditionally permitted use in the AG-40 zone with a Conditional Use Permit, which is requested for the project. The project is subject to and conforms with the development standards for communication facilities contained in El Dorado County Zoning Code Section 130.40.130.D, and the impact will therefore be less than significant.

(c.) No Impact. This site is not located within a habitat conservation or natural community plan area.

Mitigation Measure: None Required.

FINDING: The proposed use of the land would be consistent with the Zoning Ordinance and General Plan. There would be no impact to land use goals or standards resulting from the project.

3.11 MINERAL RESOURCES:

Would the proposal:	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?	☐	☐	☐	☒

Impact Discussion:

a) **& b) No Impact.** The California Geological Survey (CGS) has not classified the project site as being located in a Mineral Resource Zone (MRZ). The proposed project would not use or extract any mineral or energy resources and would not restrict access to known mineral resource areas.

Mitigation Measure: None required.

FINDING: No impacts to mineral resources are expected either directly or indirectly. For this mineral resources category, there would be no impacts.

3.12 NOISE:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☐	☒
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Impact Discussion:

The project site is located in an area with limited agricultural uses. Noise levels vary in the project area. Noise is expected to be limited to construction of the proposed facility and occasional use of the emergency generator. The proposed wireless communications facility is unmanned and would not expose people at the facility to noise levels.

a) & c) Less Than Significant Impact. Uses associated with this project would not create a significant increase in ambient noise levels within or in proximity to the project site. The potential use of onsite emergency standby generators would provide power until normal power is restored. The use of standby generators will be short term in duration and will not create significant impacts. An environmental noise analysis (Attachment 6) of decibel levels at each nearby residence's property line and actual residence from project-related noise sources, including the onsite Emergency Backup Generator and HVAC systems, determined that potential noise associated with the project would be substantially less than El Dorado County's noise level thresholds as specified in the El Dorado County Title 130 Zoning and Noise Ordinance, Chapter 130.37 – Noise Standards.

(b) No Impact. The proposed project would not include the development of land uses that would generate substantial ground-borne vibration or noise or use construction activities that would have such effects. No structures are proposed that would require heavy footings where the use of heavy pile drivers would be required.

(d) Less Than Significant Impact. Construction activity on the site has the potential to generate high noise levels on and adjacent to the project site intermittently during project development activities. During construction, the highest noise levels would result from operation of heavy equipment, which can be expected to generate noise levels of between 85 to 90 decibels (dBA) at a distance of 50 feet from the source. Noise levels will be reduced, however, by a factor of six dBA with each doubling of distance from the noise source and by intervening topography. Construction noise activities related to project construction are temporary in nature and will be far less than County noise thresholds at a distance of approximately 900 feet to the nearest offsite residence. Consistent with County requirements, noise generating construction activities will be limited to daytime hours between 7:00 am and 7:00 pm on weekdays and non-holidays, and 8:00 am to 5:00 pm on weekends. Given the distance from the nearest off-site residential structures, construction noise is not expected to have a significant impact on nearby residences. Furthermore, any such noise disturbance would be intermittent, short-term in nature and required to be in compliance with County requirements. The impact would therefore be less than significant.

e) & f) No Impact. The project is located more than two miles from the nearest airport or private airstrip.

Mitigation Measure: None required.

FINDING: As conditioned, and with adherence to County Code, no significant direct or indirect impacts to noise levels are expected either directly or indirectly. For this Noise category, the thresholds of significance would not be exceeded.

3.13 HOUSING:

Would the proposal:	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?	☐	☐	☐	☒

Impact Discussion:

a) No Impact. The project would not affect the population of the area because no new parcels would be created and no additional dwellings would be placed on the project site as a result of this project.

b) & c) No Impact. The project would not displace individuals or housing. The project does not require the extension of any infrastructure, such as roads, water, or sewer systems. Therefore, the project would not induce substantial population growth in the project area.

Mitigation Measure: None required.

FINDING: The project would not displace housing. There would be no potential for a significant impact due to substantial growth either directly or indirectly. For this Population and Housing category, the thresholds of significance would not be anticipated to be exceeded.

3.14 PUBLIC SERVICES:

Would the proposal:	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 or 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?	☐	☐	☒	☐
b. Fire protection?	☐	☐	☒	☐
c. Police Protection?	☐	☐	☐	☒
d. Schools?	☐	☐	☐	☒
e. Parks?	☐	☐	☐	☒
f. Other public services?	☐	☐	☐	☒

Impact Discussion:

a) - b) Less Than Significant Impact. The El Dorado County Fire Protection District (District) currently provides emergency service to the project parcel and had no comments or concerns regarding this project. However, the parcel is located just outside District boundaries. As the project could result in increased needs for fire protection services to the site, an Out of Agency Service Agreement between AT&T and the District will be required as a condition of approval to ensure adequate fire protection services will continue to be provided as needed. In addition, the property owner will be required to obtain approval of an annexation of the project parcel into the District from the El Dorado Local Agency Formation Commission (El Dorado LAFCO) within five years of project approval.

c) No Impact. The proposal is not expected to result in an increase in demand for police services because wireless communication facilities do not normally require such services.

d) No Impact. The communication facility is an unmanned facility and therefore will not result in an increase in demand for school facilities in the area.

e) No Impact. The communication facility is an unmanned facility and therefore will not create an increase in park usage.

e) No Impact. The communication facility is an unmanned facility and therefore will not require other public services

Mitigation Measure: None required.

FINDING: The project would not result in a significant increase of public services to the project. For this Public Services category, impacts would be less than significant.

3.15 RECREATION:

Would the proposal:	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?	☐	☐	☐	☒

Impact Discussion:

a) & b) No Impact. The communication facility is an unmanned facility and therefore will not create an increase in park usage. No recreational facilities are proposed under this proposal and none are located on the project site. No impacts on existing or future recreational facilities would occur.

Mitigation Measure: None required.

FINDING: No significant impacts to open space or park facilities would result as part of the project. For this Recreation category, impacts would be less than significant.

3.16 TRANSPORTATION/TRAFFIC:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e. Result in inadequate emergency access?	☐	☐	☐	☒
f. Result in inadequate parking capacity?	☐	☐	☐	☒
g. Conflict with accepted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

Impact Discussion:

Access to the facility will be provided by a 20-foot wide access driveway from Big Sky Ranch Road.

(a) & (b) Less Than Significant Impact. The project area is rural residential and agricultural, and there are low traffic volumes. The proposed wireless communication facility would temporally generate additional vehicle traffic in the project area during construction activities. This would be minor and would not have a significant impact on vehicular circulation in the

project area. Once construction has been completed, traffic will return to pre-construction levels. After construction activities have been completed, the project would require only one to two site visits per month. This very low number of vehicle trips would not have any impact on existing vehicular circulation in the project area.

(c) No Impact. The project site is not located within an Airport Compatibility Zone.

(d) No Impact. The project design does not involve any significant modifications to Big Sky Ranch Road, nor create any additional hazards of safety concerns.

(e) – (g) No Impact. Since the project is an unmanned facility and does not involve a substantial number of vehicle trips, the project will not result in inadequate emergency access.

Mitigation Measure: None required.

FINDING: The project would not exceed the thresholds for traffic identified within the General Plan. For this Transportation/Traffic category, the thresholds of significant would not be exceeded and impacts would be less than significant.

3.17 TRIBAL CULTURAL RESOURCES:

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

Impact Discussion:

a) Less Than Significant Impact. The United Auburn Indian Community of the Auburn Rancheria (UAIC), the Wilton Rancheria, the Washoe Tribe of Nevada and California, the Ione Band of Miwok Indians, the Nashville-El Dorado Miwok, the T'si Akim Maidu, and the Shingle Springs Band of Miwok Indians were notified of the proposed project and given access to all project documents. No other tribe had requested to be notified of the proposed projects for consultation in the project area at the time. In response to requests from the UAIC and the Shingle **Springs** Band of Miwok Indians, the Cultural Resources Search for the consultation was received for this project. Pursuant to the Records Search, by the North Central Information Center, the geographic area of the project sites are not known to contain any resources listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as designed in Public Resources Code section 5020.1(k), or considered significant by a California Native American tribe. The impact would be less than significant.

b) Less Than Significant Impact. See discussion 4.17(a) – *Tribal Cultural Resources.*

Mitigation Measure: None required.

FINDING: No significant TCRs are known to exist on the project site. As a result, the proposed project would not cause a substantial adverse change to a TCR and there would be a less than significant impact.

3.18 UTILITIES AND SERVICE SYSTEMS:

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g. Comply with federal, state, and local statutes, and regulations related to solid waste?	☐	☐	☐	☒

Impact Discussion:

(a) - g) No Impact. Implementation of the project would not require domestic water or wastewater treatment, or solid waste facilities. It would not be in non-compliance with any statutes or regulations relating to solid waste, nor would it employ equipment that would introduce interference into any system. Thus, the project would have no impact on any utilities or service systems.

Mitigation Measure: None required.

FINDING: No significant utility and service system impacts would be expected with the project, either directly or indirectly. For this Utilities and Service Systems category, the thresholds of significance would not be exceeded.

3.19 MANDATORY FINDINGS OF SIGNIFICANCE (SECTION 15065):

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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, 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. 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)?	☐	☐	☒	☐

Would the proposal:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Discussion:

a) Less Than Significant Impact with Mitigation Incorporated. With the implementation of mitigation measures included in this Initial Study, the proposed project would not degrade the quality of the environment; result in an adverse impact on fish, wildlife, or plant species including special status species, or prehistoric or historic cultural resources. Prehistoric or historic cultural resources would not be adversely affected because no archeological or historic resources are known to exist in the project area and project implementation includes following appropriate procedures for avoiding or preserving artifacts or human remains should they be uncovered during project excavation.

b) Less Than Significant Impact. There are no identified impacts that are individually limited, but cumulatively considerable. Past, current, and probable future projects in the vicinity of the project site were reviewed to determine if any additional cumulative impacts may occur with the approval of this project. A two-mile radius was used in determining cumulative impacts. No cumulative impacts were discovered.

c) Less Than Significant Impact with Mitigation Incorporated. There have been no impacts discovered through the review of this application demonstrating that there would be substantial adverse effects on human beings either directly or indirectly. However, the proposed project has the potential to cause both temporary and future impacts to the area by project-related impacts relating to air, biological resources, and cultural resources. With implementation of mitigation measures included in this Initial Study, these impacts would be effectively mitigated to a less than significant level.

SUPPORTING INFORMATION SOURCE LIST

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Initial Study Attachments

Attachment 1.....Site Plan
Attachment 2.....Coverage Map
Attachment 3.....Co-Location Analysis
Attachment 4.....Alternative Sites Analysis
Attachment 5.....Photo Simulations
Attachment 6.....Environmental Noise Analysis
Attachment 7.....Radio Frequency Emissions Report

THIS IS NOT A SITE SURVEY

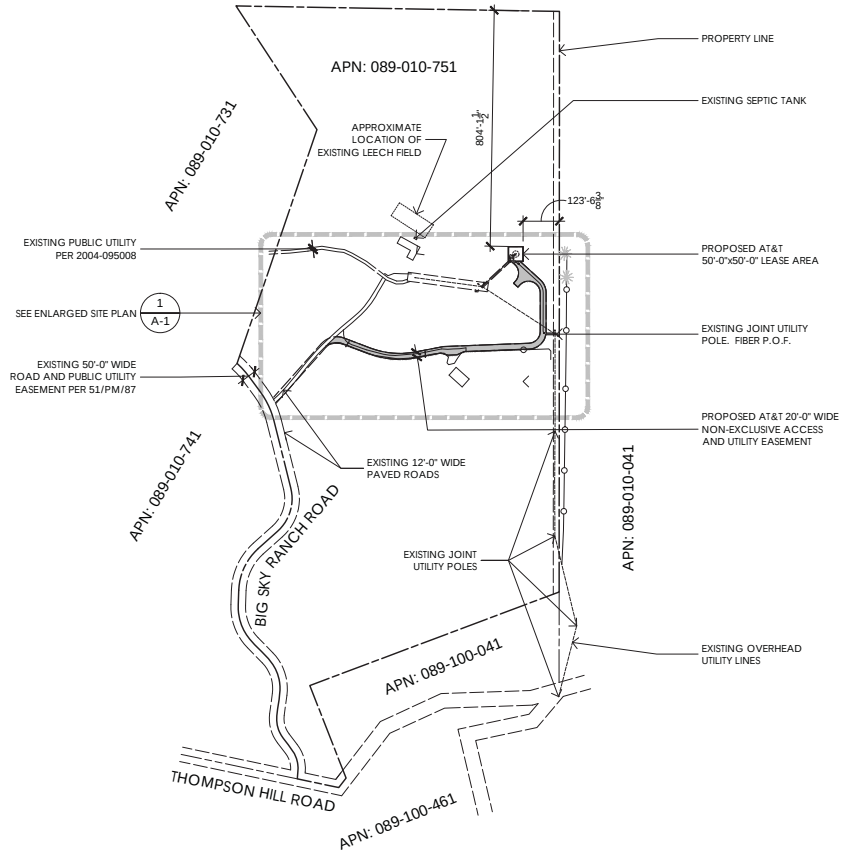
ALL PROPERTY BOUNDARIES, ORIENTATION OF TRUE NORTH AND STREET HALF-WIDTHS HAVE BEEN OBTAINED FROM A TAX PARCEL MAP AND EXISTING DRAWINGS AND ARE APPROXIMATE.

NOTES:

1. NO GRADING OR PERMANENT CONSTRUCTION SHALL OCCUR WITHIN DRIP LINES OF TREES THAT ARE TO REMAIN WITHOUT ARBORIST APPROVAL.

2. PRIOR TO CONSTRUCTION, GENERAL CONTRACTOR TO CONTACT DIGALERT TO MARK OUT EXISTING UNDERGROUND UTILITIES. IN THE EVENT OF CONFLICTS, CONTRACTOR TO CONTACT PDC.

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 1 - SITE PLAN



PLAN NORTH
NORTH

1 OVERALL SITE PLAN
1"=200'

0' 40' 200' 400'
1" = 200.0'

Issued For:

CVL00330
LOTUS ROAD

5621 BIG SKY RANCH RD.
PLACERVILLE, CA 95667

PREPARED FOR

at&t

2600 Camino Ramon
San Ramon, California 94583

Vendor:

COMPLETE Wireless Consulting, Inc.

AT&T SITE NO:	CVL00330
PROJECT NO:	162.2196
DRAWN BY:	MWS
CHECKED BY:	TST

REV	DATE	DESCRIPTION
1	09/11/18	100% ZD Rev 1
	06/01/18	100% ZD
	05/03/18	90% ZD

Licensee:

Architect:

MST ARCHITECTS

1520 River Park Drive
Sacramento, California 95815

SHEET TITLE:

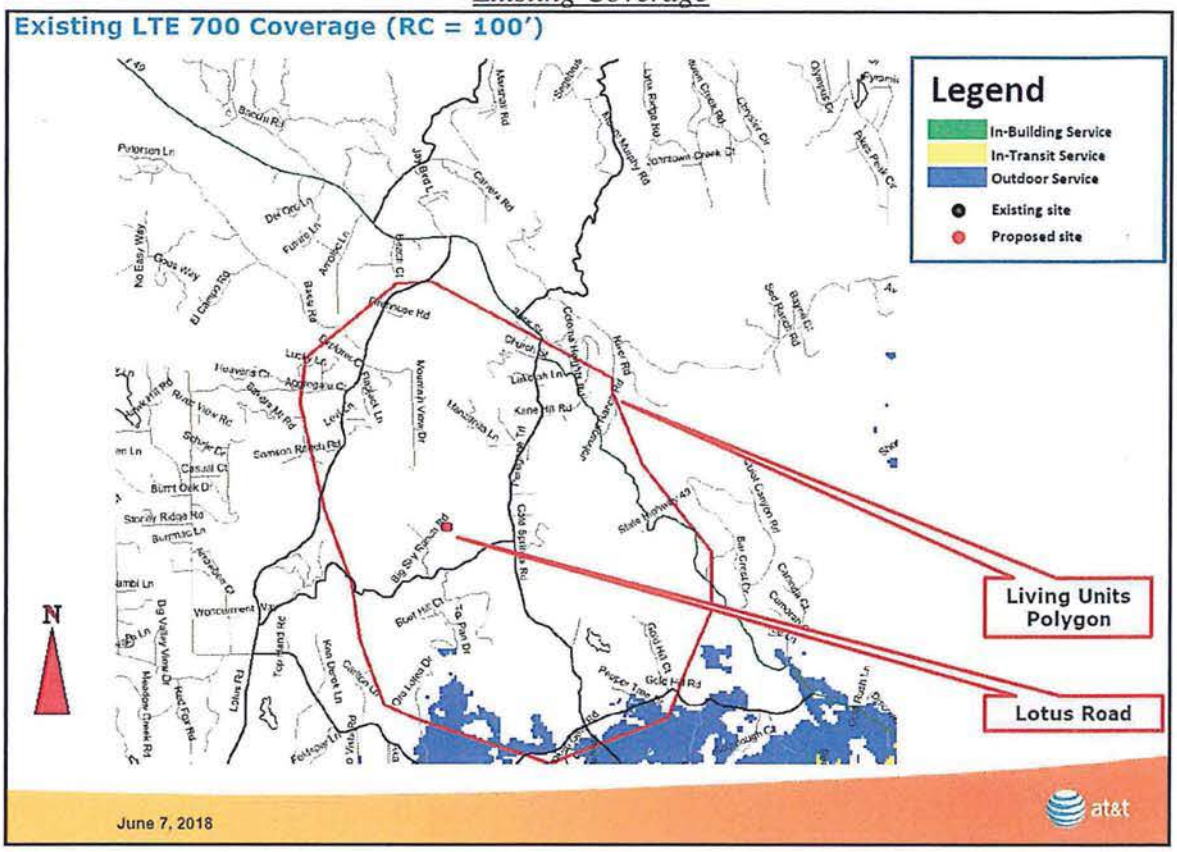
OVERALL SITE PLAN

SHEET NUMBER:

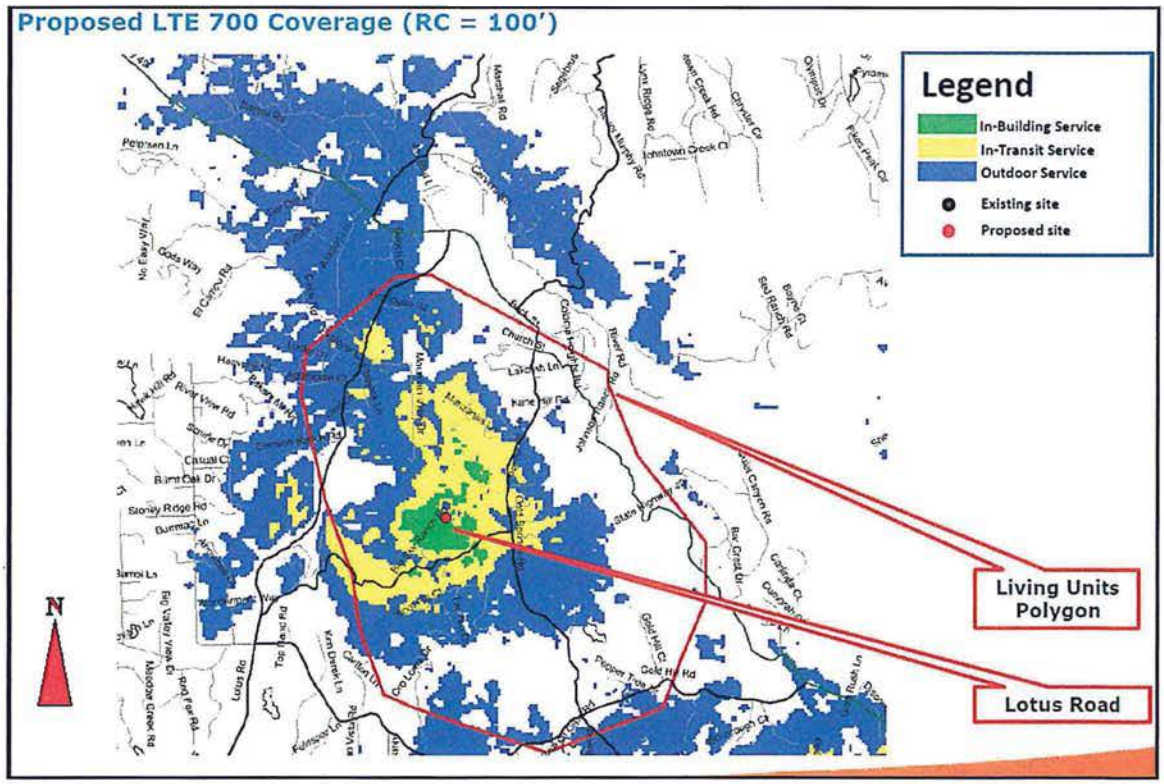
A-0

CUP18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 2 - COVERAGE MAP

Existing Coverage



Proposed Coverage

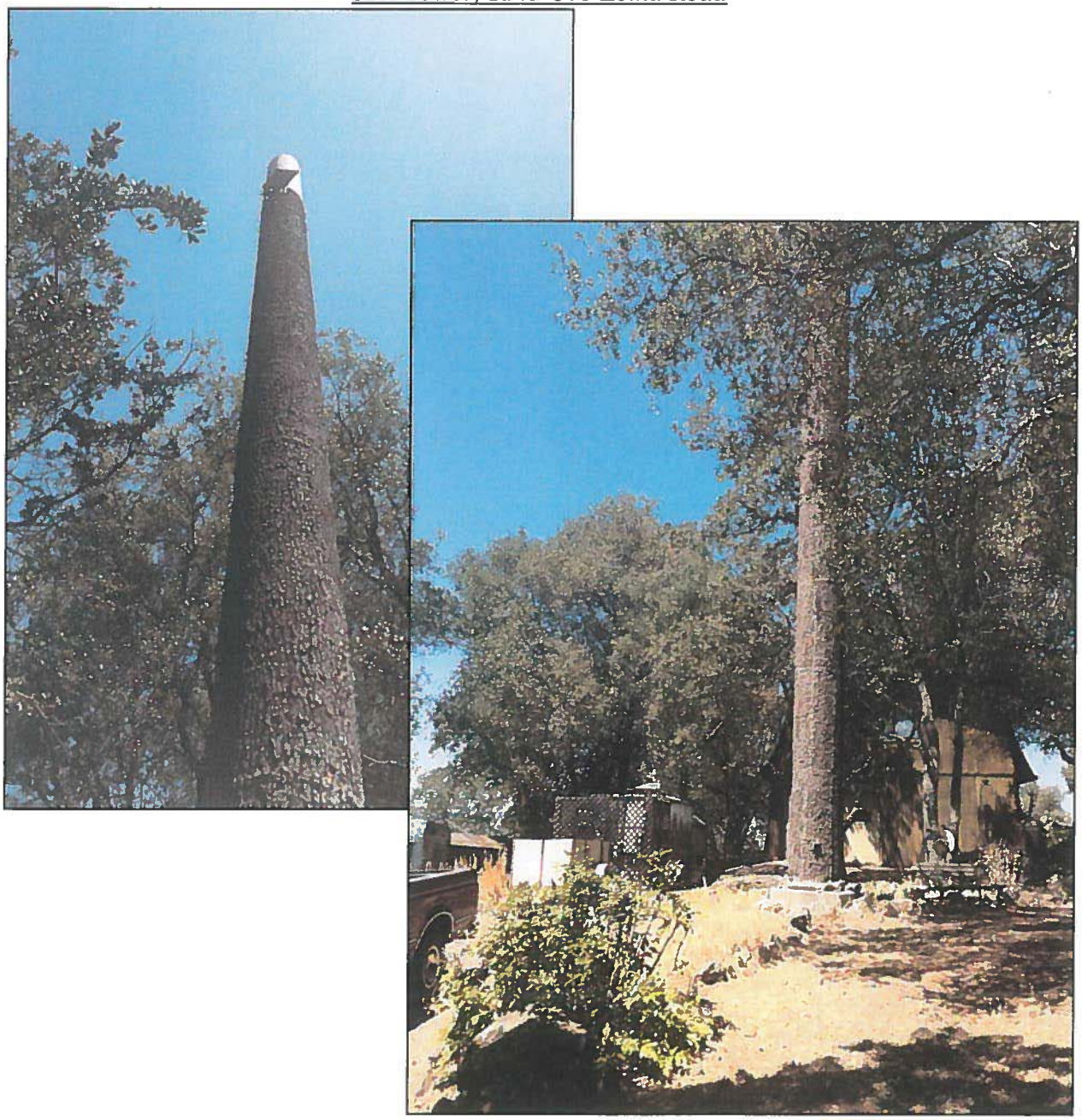


CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 3 - CO-LOCATION ANALYSIS

COLLOCATION OPTIONS

There is one SBA tower located at the top of a ridge at 1242 Oro Loma Road. However, it is partially dismantled to approximately 50' and located in very close vicinity to an existing residential building on a residentially-zoned parcel. Furthermore, AT&T's RAN engineer required antennas at a height of 100' in order to meet AT&T's coverage objectives. At this location, there would be increased visual impacts from the nearest public rights-of-ways due to the required height in combination with the existing elevation. Lastly, the required height would place the tower directly adjacent to the existing out building on the parcel.

SBA Tower, 1242 Oro Loma Road



CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 3 - CO-LOCATION ANALYSIS

Ground Equipment for SBA Tower, 1242 Oro Loma Road

ALTERNATIVE SITES ANALYSIS
AT&T MOBILITY

Site Name: CVL0330 Lotus Road
Location: 5621 Big Sky Ranch Road, Placerville, CA 95667
APN: 089-010-751

Introduction

AT&T Mobility strives to minimize visual and noise impacts for each facility and seeks to incorporate ways to preserve the local community character to the greatest extent feasible at all stages of site selection and design process. Part of this involves seeking properties in areas with substandard wireless coverage that provide the ability to meet community needs, zoning standards, and engineering requirements.

In identifying the location of a new wireless telecommunication facility to fulfill the above referenced service objectives a variety of factors are evaluated. These factors include:

- A willing landlord;
- Compliance with local zoning requirements;
- Satisfaction of the radiofrequency coverage need; and
- Constructability, including available utilities and road access.

Colocation Opportunities Investigated

The first step is always to seek existing structures that would allow for colocation instead of needing to construct a brand-new facility.

Approximately 1.1 miles away from the proposed facility, there is a 55 ft. tall slimline pole, owned by SBA Towers, located at 1242 Oro Loma Road. This facility is located up on a hill and located next to an existing residence. Furthermore, the tower itself is not fenced or enclosed in anyway. The addition of AT&T equipment would require the addition of land for it required ground equipment.

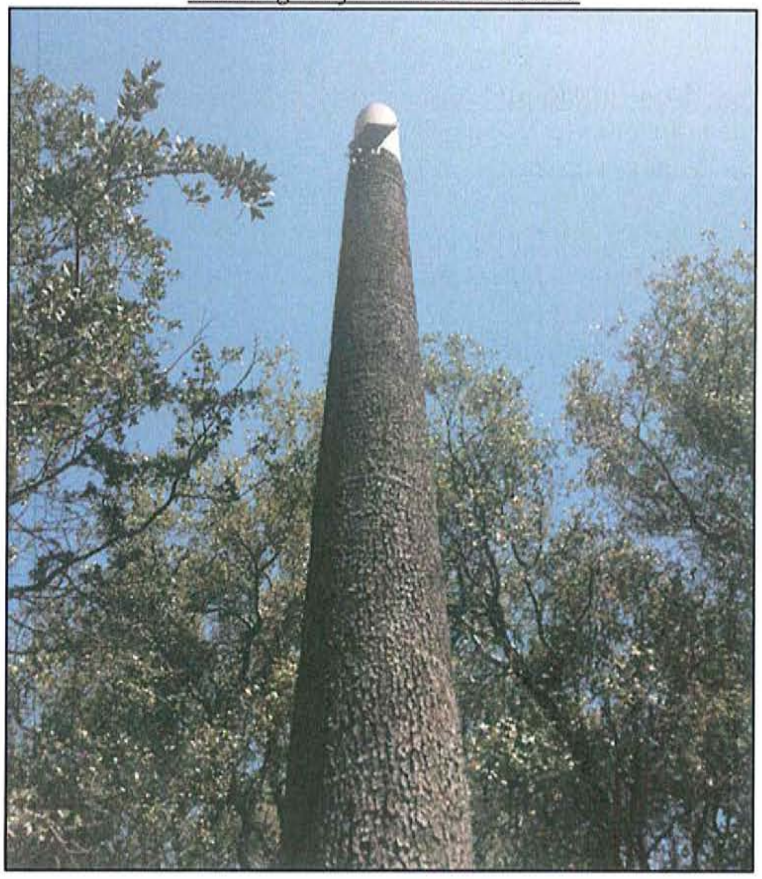
Furthermore, though existing trees provide some screening for the 55-ft. tall SBA Tower, the required height by AT&T's radio frequency engineer at this location entails doubling the height of the facility and providing a larger visual impact than at the original proposed location at 5621 Big Sky Ranch Road, Placerville, CA 95667.

Lastly, due to the terrain of AT&T's targeted search area and its objectives in reaching the southern portions of Coloma, the proposed facility must be approximately 120 ft. tall and placed closer to the hills of Marshall Gold Discovery State Historic Park.

Due to the limitations of space, lack of required height, visual impact, and inability to cover southern Coloma, the SBA Tower was eliminated as a possible colocation opportunity.

Photo of Existing SBA Ground Equipment

Existing 55-ft. Tall SBA Tower



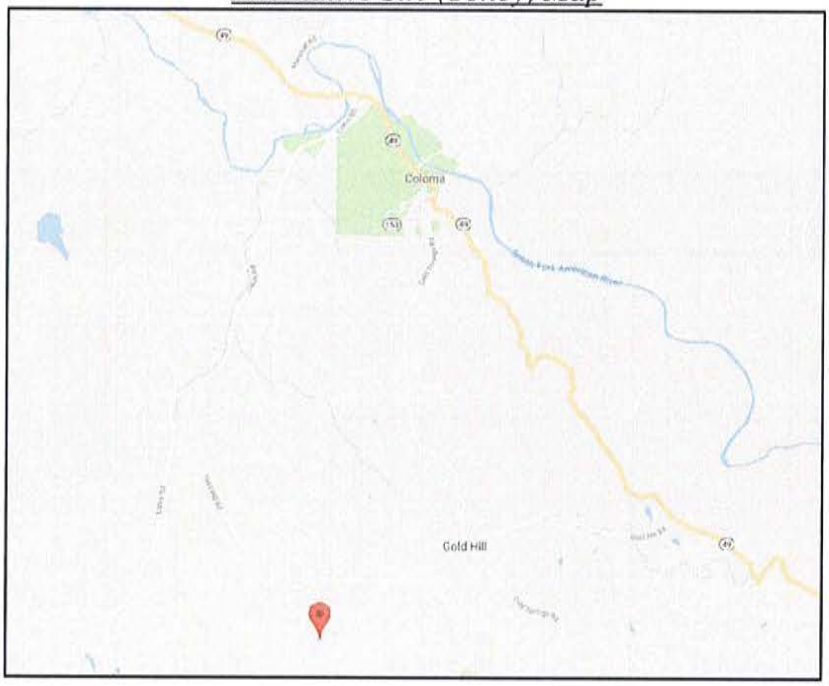
CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 4 - ALTERNATIVE SITES ANALYSIS

Additional Sites Investigated

Willing landlords in the search area were scarce. Additionally, due to the prevalence of private roads—the majority of the search area is bounded by Lotus Road, Cold Springs Road, and Gold Hill Road—legal access routes are difficult to obtain. Although one interested landlord may have been identified, the subsequent access easement negotiations consistently failed due to an unresponsive or unwilling property owner along the route.

Name:	Toney
Address:	1820 Pet Rock Road, Placerville, CA 95667
APN:	317-030-12-100
Coordinates:	38.750959, -120.904475
Zone:	RA20
Parcel Size:	24.32 acres

Alternative Site (Toney) Map



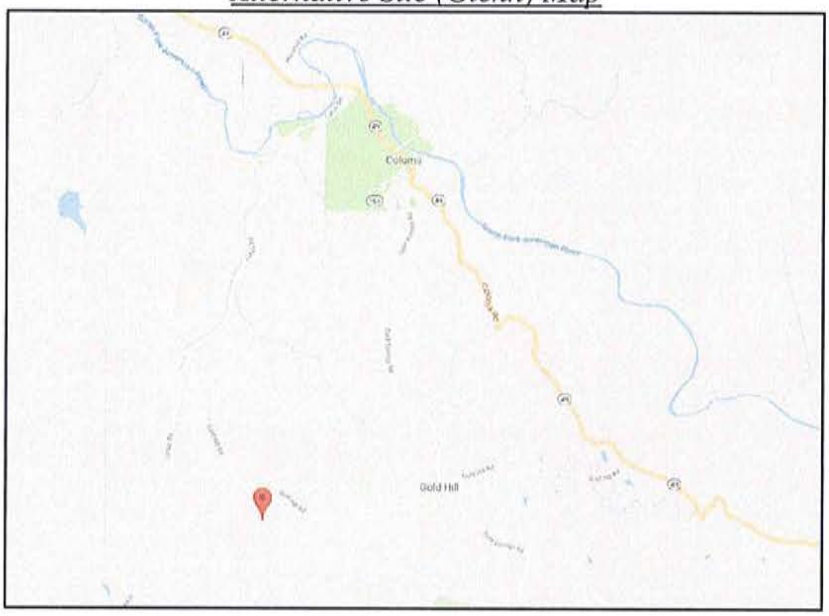
This property was a large hilltop parcel with no residences in the nearby vicinity. Though the property owner was interested, no access agreement could be negotiated to get to the potential facility location. Additionally, the potential location is up on a hill and completely undeveloped. This necessitates a widened access road, turnarounds and turnouts for fire compliance, and a retaining wall for the tower itself. The construction costs, which includes bringing power to the site, would require a grading plan, the addition of overhead power poles to the potential site, and more disturbance to the land than the proposed candidate at 5621 Big Sky Ranch Road, Placerville, CA 95667.

During investigation of locations in the southern half of the search area, AT&T's radio frequency engineer ultimately requested a location further north of Gold Hill Road in order to cover the southern portions of Coloma.

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 4 - ALTERNATIVE SITES ANALYSIS

Name: Glenn
Address: 1320 Rancho Vista Road, Placerville, CA 95667
APN: 089-120-05-100
Coordinates: 38.756780, -120.911794
Zone: RE-5
Parcel Size: 11.00 acres

Alternative Site (Glenn) Map



Though the property owner was interested, no access agreement could be negotiated to get to the potential facility location. Additionally, the potential location is up on a hill, which necessitates a widened access road, turnarounds and turnouts, and a retaining wall for the tower itself.

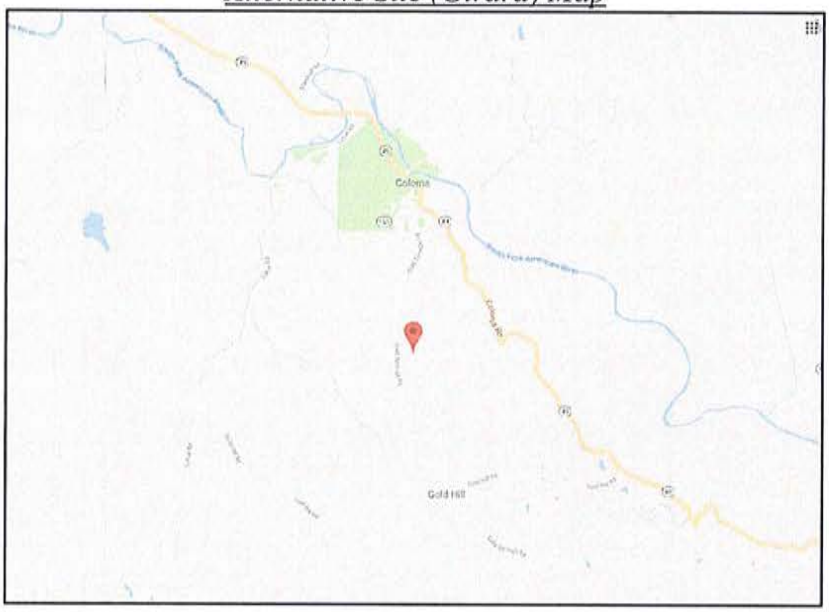
Furthermore, this potential candidate was less appealing than the Toney parcel above because of the proximity to existing residences along Rancho Vista Lane.

During investigation of locations in the southern half of the search area, AT&T's radio frequency engineer ultimately requested a location further north of Gold Hill Road in order to cover the southern portions of Coloma.

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 4 - ALTERNATIVE SITES ANALYSIS

Name:	David Girard Vineyards
Address:	741 Cold Springs Road, Placerville, Ca 95667
APN:	089-030-23-100
Coordinates:	38.778492, -120.890131
Zone:	RE-10
Parcel Size:	41.52 acres

Alternative Site (Girard) Map



This potential candidate was promising due to the commercial use of the parcel; however, the majority of the parcel sits within a basin/valley that would require additional height added to the AT&T radio frequency engineer's originally requested 120 ft. Furthermore, AT&T investigated the office building and parking lot of the Vineyards. However, there was not enough space to site a new freestanding facility without the removal of at least two (2) parking spaces. Lastly, all active vineyard locations were eliminated due to the loss of farmable land and access road improvements needed.

Conclusion

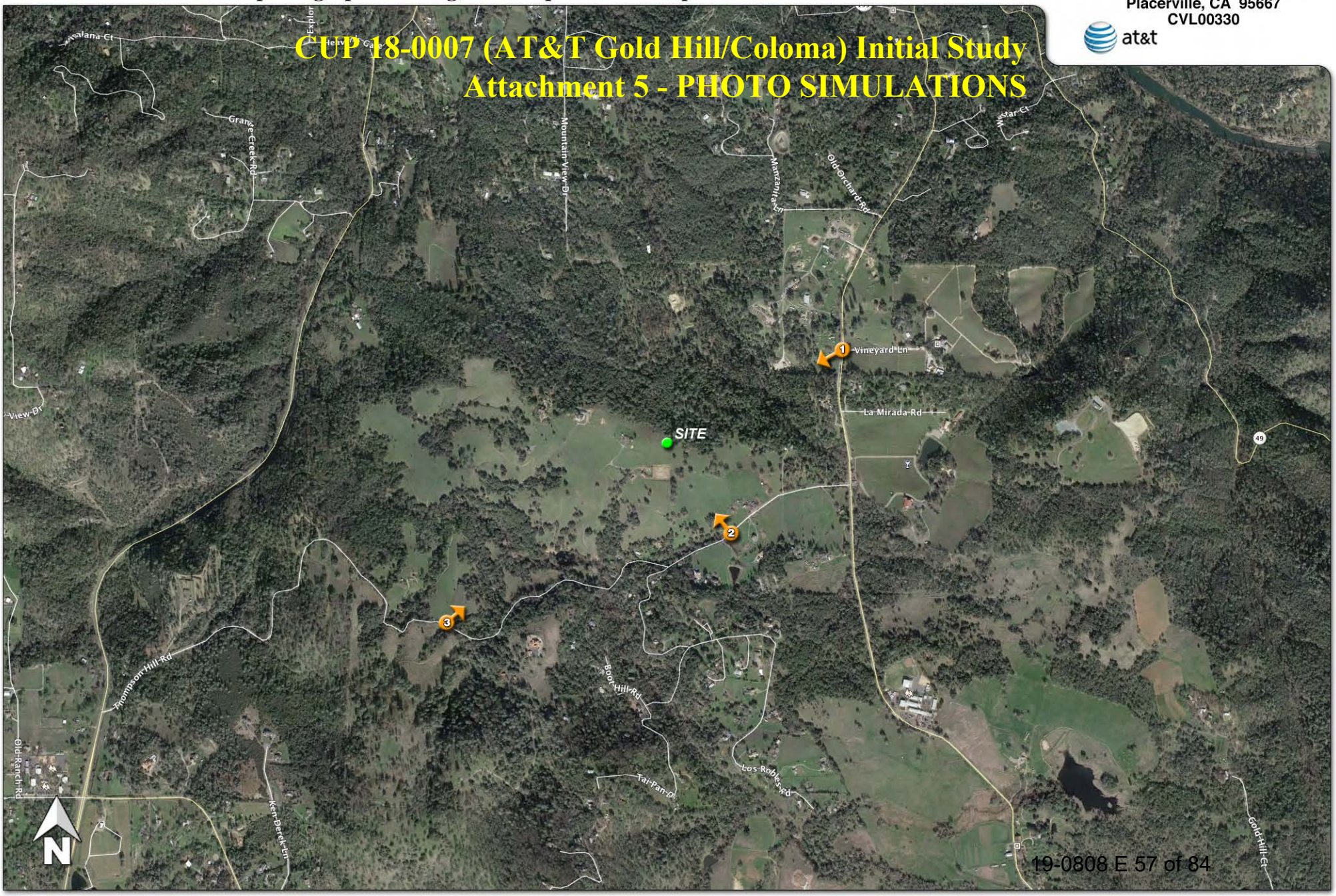
After an exhaustive search for potential sites and co-location possibilities and a review of the applicable zoning laws, the proposed site at 5621 Big Sky Ranch Road, Placerville, CA 95667 (APN 089-010-751) was selected because it is the best available and least intrusive candidate to improve service to the area and to meet the wireless coverage objective in the area lacking coverage along this particular portion of El Dorado County.

Aerial photograph showing the viewpoints for the photosimulations.

Lotus Road
5621 Big Sky Ranch Rd
Placerville, CA 95667
CVL00330

at&t

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 5 - PHOTO SIMULATIONS



CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 5 - PHOTO SIMULATIONS

1

Photosimulation of the view looking southeast from Cold Springs Road at Vineyard Lane.

Lotus Road
5621 Big Sky Ranch Rd
Placerville, CA 95667
CVL00330

at&t

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 5 - PHOTO SIMULATIONS

2

Photosimulation of the view looking northwest from the nearest point along Thompson Hill Road.

Lotus Road
5621 Big Sky Ranch Rd
Placerville, CA 95667
CVL00330

at&t

3

CUP 18-0007 (AT&T Gold Hill/Coloma) Initial Study
Attachment 5 - PHOTO SIMULATIONS

Photosimulation of the view looking northeast from the clearest view along Thompson Hill Road.

Lotus Road
5621 Big Sky Ranch Rd
Placerville, CA 95667
CVL00330
at&t

Environmental Noise Analysis

Lotus Road AT&T Cellular Facility

Placerville (El Dorado County), California

BAC Job # 2018-092

Prepared For:

Complete Wireless Consulting

Attn: Lindsey Ekins
2009 V Street
Sacramento, CA 95818

Prepared By:

Bollard Acoustical Consultants, Inc.

Paul Bollard, President

May 21, 2018

BOLLARD
Acoustical Consultants

3551 Bankhead Road • Loomis, CA 95650 • Phone: (916) 663-0500 • Fax: (916) 663-0501 • BACNOISE.COM

Introduction

The Lotus Road AT&T Wireless Unmanned Telecommunications Facility Project (project) proposes the installation of cellular equipment within a fenced lease area located at 5621 Big Sky Ranch Road in Placerville (El Dorado County), California. The externally mounted HVAC unit of the pre-manufactured walk-in cabinet and emergency diesel standby generator have been identified as the primary noise sources associated with the project. Please see Figure 1 for the project site location. The studied site design is dated May 3, 2018.

Bollard Acoustical Consultants, Inc. has been contracted by Complete Wireless Consulting, Inc. to complete an environmental noise assessment regarding the proposed project cellular equipment operations. Specifically, the following addresses daily noise production and exposure associated with operation of the project emergency generator and external HVAC equipment.

Please refer to Appendix A for definitions of acoustical terminology used in this report. Appendix B illustrates common noise levels associated with various sources.

Criteria for Acceptable Noise Exposure

El Dorado County General Plan Noise Element

The El Dorado County General Plan Noise Element establishes noise level criteria for acceptable noise exposure at noise-sensitive land uses due to non-transportation noise sources.

Table 1
Noise Level Performance Standards for Noise-Sensitive Land Uses Affected by Non-Transportation Sources
(Table 6-2 of El Dorado County General Plan Noise Element)

	Daytime 7 a.m. – 7 p.m.		Evening 7 p.m. – 10 p.m.		Night 10 p.m. – 7 a.m.	
Noise Level Descriptor	**Community**	**Rural**	**Community**	**Rural**	**Community**	**Rural**
Hourly L_{eq}, dB	55	50	50	45	45	40
Maximum Level, dB	70	60	60	55	55	50

Notes:
-Each of the noise levels specified above shall be lowered by five dB for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).
-The County can impose noise level standards which are up to 5 dB less than those specified above based upon determination of existing low ambient noise levels in the vicinity of the project site.
-In Community areas the exterior noise level standard shall be applied to the property line of the receiving property.
-In Rural Areas the exterior noise level standard shall be applied at a point 100' away from the residence. The above standards shall be measured only on property containing a noise sensitive land use as defined in Objective 6.5.1. This measurement standard may be amended to provide for measurement at the boundary of a recorded noise easement between all effected property owners and approved by the County.


900 feet
APN: 089-010-751
(Project Parcel)
BIG SKY RANCH ROAD
THOMPSON HILL ROAD
Legend
Proposed Cellular Facility Lease Area
Parcel Boundaries
Nearest Noise-Sensitive Receiver
Scale (Feet)
0
150
300
N
Lotus Road Cellular Facility
Placerville (El Dorado County), California
Project Site Location & Distance to
Nearest Noise-Sensitive Receiver
Figure 1
BOLLARD
Acoustical Consultants

Because the project parcel and adjacent parcels are in a rural area, the rural noise standards shown in Table 1 have been applied to project equipment noise exposure and assessed at a point 100 feet away from the nearest noise-sensitive receptor (residence).

Project Noise Generation

As discussed previously, there are two project noise sources which are considered in this evaluation; the externally mounted HVAC unit and the emergency generator. The evaluation of potential noise impacts associated with the operation of each noise source is evaluated separately as follows:

HVAC Equipment Noise Source and Reference Noise Level

The project proposes the installation of pre-manufactured walk-in cabinet equipped with one (1) external HVAC unit within the lease area illustrated on Figure 1. According to the information obtained from the client, the project proposes one 4-ton HVAC unit (Marvair ComPac I Model AVPA42ACA). Based on reference noise level data obtained from the manufacturer, this specific HVAC unit model has a reference noise level of 60 dB at a distance of 30 feet. The manufacturer's noise level data specification sheet for the proposed units are provided as Appendix C.

Generator Noise Source and Reference Noise Level

A Polar Power, Inc. Model 8340Y-3TNV88-001 (15 kW) diesel generator equipped with the 88-25-0603 enclosure is proposed for use at this facility to maintain cellular service during emergency power outages. Noise exposure from the proposed generator is expected to be 64 dB at a distance of 23 feet from the equipment. The manufacturer's noise level data specification sheet is provided as Appendix D.

The generator which is proposed at this site would only operate during emergencies (power outages) and brief daytime periods for periodic maintenance/lubrication. According to the project applicant, testing of the generator would occur twice per month, during daytime hours, for a duration of approximately 15 minutes. The emergency generator would only operate at night during power outages. It is expected that nighttime operation of the project emergency generator would be exempt from the County's exterior noise exposure criteria due to the need for continuous cellular service provided by the project equipment.

Predicted Facility Noise Levels at Nearest Noise-Sensitive Receptor

As indicated in Figure 1, the project equipment lease area maintains a separation of approximately 900 feet from the nearest noise-sensitive receptor (residence), identified as receiver 1 on Figure 1. Assuming standard spherical spreading loss (-6 dB per doubling of distance), project-equipment noise exposure at the closest receiver was calculated and the results of those calculations are presented in Table 2.

Table 2
Summary of Project-Related Noise Exposure at Nearest Noise-Sensitive Receptor
Lotus Road AT&T Wireless Telecommunications Facility Project

Nearest Receiver[1]	Distance from Cellular Equipment, feet[2]	Predicted Equipment Noise Levels, dBA	
		HVAC Unit (L_{eq})	Generator (L_{max})
1	900	33	32

Notes:

[1] Receiver location is shown on Figure 1.

[2] As indicated in the El Dorado County General Plan, the predicted equipment noise levels were assessed at a point 100 feet away from the nearest residence (receiver 1).

Because the HVAC unit could potentially be in operation during nighttime hours, the operation of the HVAC unit would be subject to the County's nighttime noise level standard of 40 dB L_{eq}. As shown in Table 2, the predicted HVAC unit noise level of 33 dB L_{eq} at the nearest noise-sensitive receptor (residence) would satisfy the El Dorado County 40 dB L_{eq} nighttime noise level standard. As a result, no further consideration of noise mitigation measures would be warranted for this aspect of the project.

Because the project generator would only operate during daytime hours for brief periods required for testing and maintenance, the operation of the generator would be subject to the County's daytime noise level standard of 60 dB L_{max}. As indicated in Table 2, the predicted generator noise level of 32 dB L_{max} at the nearest residence would satisfy the El Dorado County 60 dB L_{max} daytime noise level standard by a wide margin. As a result, no further consideration of noise mitigation measures would be warranted for this aspect of the project.

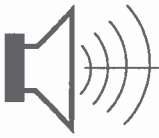
Conclusions

Based on the equipment noise level data and analyses presented above, project-related equipment noise exposure is expected to satisfy the applicable El Dorado County noise exposure limits at the closest noise-sensitive receiver. As a result, no additional noise mitigation measures would be warranted for this project.

This concludes our environmental noise assessment for the proposed Lotus Road Cellular Facility in Placerville (El Dorado County), California. Please contact BAC at (916) 663-0500 or paulb@bacnoise.com with any questions or requests for additional information.

Appendix A
Acoustical Terminology

Acoustics	The science of sound.
Ambient Noise	The distinctive acoustical characteristics of a given space consisting of all noise sources audible at that location. In many cases, the term ambient is used to describe an existing or pre-project condition such as the setting in an environmental noise study.
Attenuation	The reduction of an acoustic signal.
A-Weighting	A frequency-response adjustment of a sound level meter that conditions the output signal to approximate human response.
Decibel or dB	Fundamental unit of sound, A Bell is defined as the logarithm of the ratio of the sound pressure squared over the reference pressure squared. A Decibel is one-tenth of a Bell.
CNEL	Community Noise Equivalent Level. Defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by a factor of three and nighttime hours weighted by a factor of 10 prior to averaging.
Frequency	The measure of the rapidity of alterations of a periodic signal, expressed in cycles per second or hertz.
Ldn	Day/Night Average Sound Level. Similar to CNEL but with no evening weighting.
Leq	Equivalent or energy-averaged sound level.
Lmax	The highest root-mean-square (RMS) sound level measured over a given period of time.
Loudness	A subjective term for the sensation of the magnitude of sound.
Masking	The amount (or the process) by which the threshold of audibility is for one sound is raised by the presence of another (masking) sound.
Noise	Unwanted sound.
Peak Noise	The level corresponding to the highest (not RMS) sound pressure measured over a given period of time. This term is often confused with the Maximum level, which is the highest RMS level.
RT_{60}	The time it takes reverberant sound to decay by 60 dB once the source has been removed.
Sabin	The unit of sound absorption. One square foot of material absorbing 100% of incident sound has an absorption of 1 sabin.
SEL	A rating, in decibels, of a discrete event, such as an aircraft flyover or train passby, that compresses the total sound energy of the event into a 1-s time period.
Threshold of Hearing	The lowest sound that can be perceived by the human auditory system, generally considered to be 0 dB for persons with perfect hearing.
Threshold of Pain	Approximately 120 dB above the threshold of hearing.



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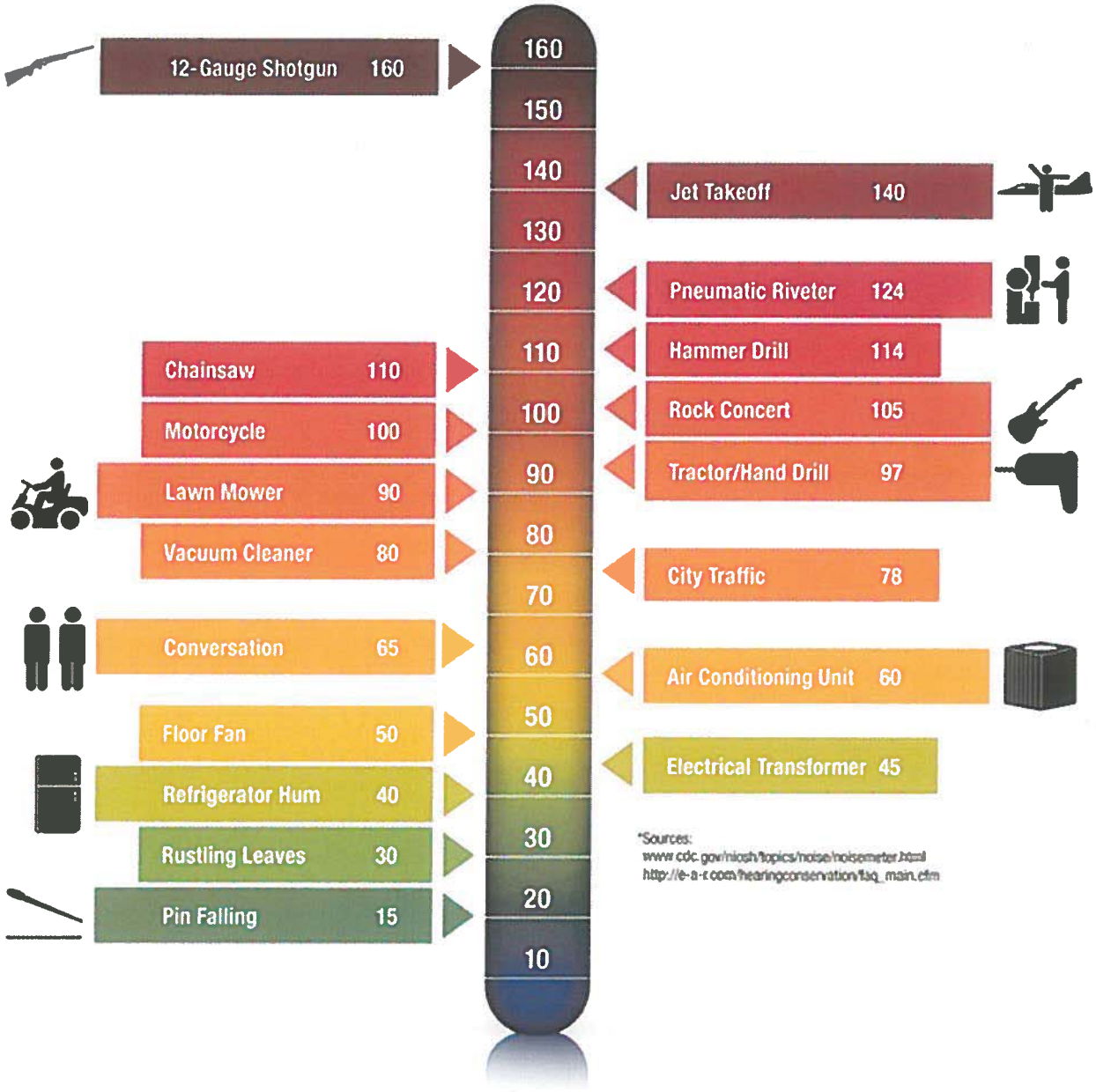
Appendix B

Typical A-Weighted Sound Levels of Common Noise Sources



Appendix C

Marvair

156 Seedling Drive
Cordele, Georgia 31015
229-273-8058

Distance From Unit (Feet)	Marvair Sound Data for the ComPac I and II Air Conditioners (dBA)						
	AVPA24ACA	AVPA30HPA	AVPA36ACA	AVPA42ACA	AVPA48ACA	AVPA60ACA	AVPA72ACA
5	66	69	70	70	72	73	69
10	61	67	66	66	68	70	64
20	56	63	62	62	63	65	60
30	53	61	58	60	61	63	58
40	51	59	56	59	58	61	56
50	50	57	55	57	57	60	55
60	49	56	53	56	56	58	53
70						57	
80						56	

Notes: (1) Test Date: March 1-30, 2011
(2) Background Sound Level: 30 to 33 dBA

A Division of AIRXCEL, Inc.

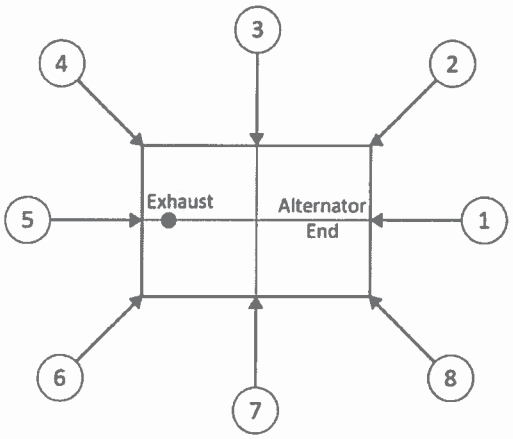
Appendix D

POLAR POWER INC

Type of Test	Sound Test	Serial No.	n/a
Test No.	080415	Controller serial No.	n/a
Generator model	8340Y-3TNV88-001 (15kW) Diesel	Observer	PY/JB
Enclosure model	88-25-0603	Date	6 Jun. 2015

Sound Pressure Levels in dB(A)

Position	Overall Level	Frequency Spectrum Levels Center Frequency (Hz)								
		31.5	63	125	250	500	1000	2000	4000	8000
1	64.4	--	45.3	49.5	51.4	50.5	49.8	46.5	44.1	38.2
2	65.1	--	47.2	48.4	49.9	49.1	46.8	46.1	45.4	38.6
3	63.8	--	44.4	48.2	48.0	49.7	47.6	46.0	46.5	38.6
4	63.9	--	44.8	48.1	45.9	50.4	48.7	47.2	46.8	40.0
5	64.7	--	45.0	48.0	48.7	50.9	49.9	46.6	46.9	40.7
6	63.8	--	44.4	47.7	48.5	49.9	49.1	46.7	47.2	40.9
7	64.7	--	44.3	48.2	46.6	49.9	48.5	46.6	46.2	39.2
8	64.5	--	46.0	47.1	46.4	49.6	48.3	46.9	46.2	40.5
Average	64.4	--	45.2	48.1	48.2	50.0	48.6	46.6	46.2	39.6



Notes:

1. Generator operating at full rated load
2. Generator configuration includes quiet exhaust system
3. All measurement positions are 7 m (23 ft.) from center of generator set and 1 m (3.3 ft.) height
4. Test conducted outside on an asphalt surface, temperature 72°F, humidity 69%, wind 12 mph, barometer 29.65 inHg.
5. Meter used - Phonic PAA2, Serial No. OGA0H80208

Radio Frequency – Electromagnetic Energy (RF-EME) Compliance Report

Site No. CVL00330
MRSFR007437
Lotus Road
5621 Big Sky Ranch Road
Placerville, California 95667
El Dorado County
38.780738; -120.900953 NAD83
Monotree

The proposed AT&T installation will be in compliance with FCC regulations upon proper installation of recommended signage.

EBI Project No. 6218004405
June 13, 2018

Prepared for:

AT&T Mobility, LLC
c/o Complete Wireless Consulting Inc
2009 V St
Sacramento, California 95818-1729

Prepared by:

EBI Consulting
environmental | engineering | due diligence

TABLE OF CONTENTS

APPENDICES

EXECUTIVE SUMMARY

Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) modeling for AT&T Site CVL00330 located at 5621 Big Sky Ranch Road in Placerville, California to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Section 1.0 of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

This report contains a detailed summary of the RF EME analysis for the site, including the following:

- Site Plan with antenna locations
- Graphical representation of theoretical MPE fields based on modeling
- Graphical representation of recommended signage and/or barriers

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits and there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

As presented in the sections below, based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

As such, the proposed AT&T installation is in compliance with FCC regulations upon proper installation of recommended signage and/or barriers.

AT&T Recommended Signage/Compliance Plan

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Site compliance recommendations have been developed based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, additional guidance provided by AT&T, EBI's understanding of FCC and OSHA requirements, and common industry practice. Barrier locations have been identified (when required) based on guidance presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014.

The following signage is recommended at this site:

- Yellow CAUTION 2B sign posted at the base of the monotree climbing ladder.

The signage proposed for installation at this site complies with AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document and therefore complies with FCC and OSHA requirements. Barriers are not recommended on this site. More detailed information concerning site compliance recommendations is presented in Section 4.0 and Appendix B of this report.

1.0 FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/ controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table 1 and Figure 1 (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm^2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm^2) and an uncontrolled MPE of 1 mW/cm2 for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 850 MHz, the FCC's occupational MPE is 2.83 mW/cm^2 and an uncontrolled MPE of 0.57 mW/cm^2. For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE is 2.33 mW/cm^2 and an uncontrolled MPE of 0.47 mW/cm^2. These limits are considered protective of these populations.

Table 1: Limits for Maximum Permissible Exposure (MPE)

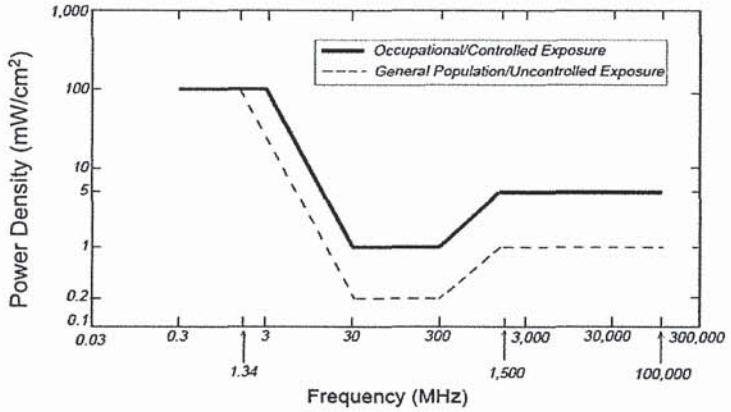
(A) Limits for Occupational/Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6

Table 1: Limits for Maximum Permissible Exposure (MPE)				
(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
1,500-100,000	--	--	5	6
(B) Limits for General Public/Uncontrolled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	$(180/f^2)$*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)
* Plane-wave equivalent power density

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)
Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm^2	0.47 mW/cm^2
Most Restrictive Freq, Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

2.0 AT&T RF Exposure Policy Requirements

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Pursuant to this guidance, worst-case predictive modeling was performed for the site. This modeling is described below in Section 3.0. Lastly, based on the modeling and survey data, EBI has produced a Compliance Plan for this site that outlines the recommended signage and barriers. The recommended Compliance Plan for this site is described in Section 4.0.

3.0 Worst-Case Predictive Modeling

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofView® software to estimate the worst-case power density at the site ground-level resulting from operation of the antennas. RoofView® is a widely-used predictive modeling program that has been developed by Richard Tell Associates to predict both near field and far field RF power density values for roof-top and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

For this report, EBI utilized antenna and power data provided by AT&T, and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65. For this report, EBI utilized antenna and power data provided by AT&T and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65. The assumptions used in the modeling are based upon information provided by AT&T and information gathered from other sources. There are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

At the nearest walking/working surfaces to the AT&T antennas, the maximum power density generated by the AT&T antennas is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational

limit) at the nearest walking/working surface to each antenna. Based on worst-case predictive modeling, there are no areas at ground level related to the proposed AT&T antennas that exceed the FCC's occupational or general public exposure limits at this site. At ground level, the maximum power density generated by the antennas is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational limit).

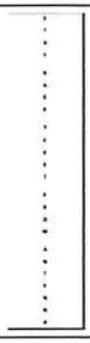
A graphical representation of the RoofView® modeling results is presented in Appendix B. It should be noted that RoofView® is not suitable for modeling microwave dish antennas; however, these units are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage. Based on AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. There are no microwaves installed at this site.

4.0 RECOMMENDED SIGNAGE/COMPLIANCE PLAN

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.

Informational Signs		Alerting Signs	
	INFO 1	 NOTICE 1	 NOTICE 2
	INFO 2	 NOTICE DECAL	
	INFO 3	 CAUTION 1 – ROOFTOP	 CAUTION 2 - ROOFTOP
	INFO 4	 CAUTION - TOWER	 WARNING

Based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, and additional guidance provided by AT&T, the following signage is recommended on the site:

- Yellow CAUTION 2B sign posted at the base of the monotree climbing ladder.

No barriers are required for this site. Barriers should be constructed of weather-resistant plastic or wood fencing. Barriers may consist of railing, rope, chain, or weather-resistant plastic if no other types are permitted or are feasible. Painted stripes should only be used as a last resort and only in regions where there is little chance of snowfall. If painted stripes are selected as barriers, it is recommended that the stripes and signage be illuminated. The signage and any barriers are graphically represented in the Signage Plan presented in Appendix B.

5.0 SUMMARY AND CONCLUSIONS

EBI has prepared this Radiofrequency Emissions Compliance Report for the proposed AT&T telecommunications equipment at the site located at 5621 Big Sky Ranch Road in Placerville, California.

EBI has conducted theoretical modeling to estimate the worst-case power density from AT&T antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements, as well as AT&T's corporate RF safety policies. As presented in the preceding sections, based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

Signage is recommended at the site as presented in Section 4.0 and Appendix B. Posting of the signage brings the site into compliance with FCC rules and regulations and AT&T's corporate RF safety policies.

6.0 LIMITATIONS

This report was prepared for the use of AT&T Mobility, LLC to meet requirements outlined in AT&T's corporate RF safety guidelines. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix A

Personnel Certifications

Reviewed and Approved by:

sealed 14jun2018

Michael McGuire
Electrical Engineer

Note that EBI's scope of work is limited to an evaluation of the Radio Frequency – Electromagnetic Energy (RF-EME) field generated by the antennas and broadcast equipment noted in this report. The engineering and design of the structure, as well as the impact of the antennas and broadcast equipment on the structural integrity of the structure, are specifically excluded from EBI's scope of work.

Preparer Certification

I, David Keirstead, state that:

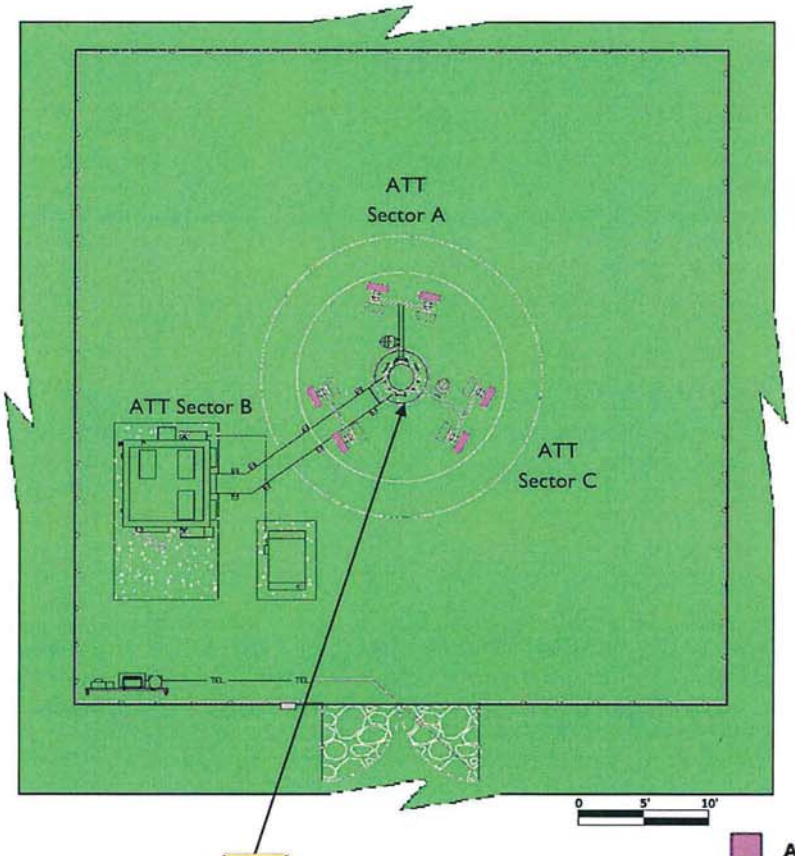
- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am familiar with the FCC rules and regulations as well as OSHA regulations both in general and as they apply to RF-EME exposure.
- I have been trained in on the procedures outlined in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document (dated October 28, 2014) and on RF-EME modeling using RoofView® modeling software.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.

David Keirstead

Appendix B

Compliance/Signage Plan

At the nearest walking/working surfaces to the AT&T antennas, the maximum power density generated by the AT&T antennas is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna. Based on worst-case predictive modeling, there are no areas at ground level related to the proposed AT&T antennas that exceed the FCC's occupational or general public exposure limits at this site. At ground level, the maximum power density generated by the AT&T antennas is approximately 5.50 percent of the FCC's general public limit (1.10 percent of the FCC's occupational limit).



% FCC Public Exposure Limit
Exposure Level ≥ 5,000
500 < Exposure Level ≤ 5,000
100 < Exposure Level ≤ 500
Exposure Level ≤ 100

Sign Identification Legend			
	Denotes AT&T Information Sign 1		Denotes AT&T NOTICE Sign
	Denotes AT&T Information Sign 2		Denotes AT&T CAUTION Sign
	Denotes AT&T Information Sign 3		Denotes AT&T CAUTION Tower Sign
	Denotes AT&T Information Sign 4		Denotes AT&T WARNING Sign

Compliance/Signage Plan
Facility Operator: AT&T Mobility
Site Name: Lotus Road
AT&T Site Number: CVL00330
USID Number: 203520
Report Date: 06-13-18
EBI Consulting