Sutter County
Initial Study

1. Project title:	Project #U22-0033 (TeleSpan Communications, LLC)
2. Lead agency name and address:	Sutter County Development Services Department Planning Division 1130 Civic Center Boulevard, Suite A Yuba City, CA 95993
3. Contact person and phone number:	Robby Thacker, Contract Planner 916-886-6036
4. Project sponsor's name and address:	<u>Applicant:</u> TeleSpan Communications, LLC 3888 State Street, Suite 204, Santa Barbara, CA 93105 <u>Landowner:</u> Sutter Union High School District Attn: Ryan Robison, Superintendent P.O. Box 498, Sutter, CA 95982 <u>Engineer:</u> Streamline Engineering and Design, Inc. 8445 Sierra College Blvd, Suite E, Granite Bay, CA 95746
5. Project Location & APN:	2665 Acacia Avenue, Sutter, CA 95982, northwest of the intersection of Griffith Lane and Acacia Avenue; APN: 13-200-128
6. General Plan Designation:	P (Public)
7. Zoning Classification:	P (Public) District

8. Description of project: The proposed project is a request for a use permit to construct a wireless telecommunications facility (WTF). The site will include a freestanding 125-foot tall monopine tower and associated ground-mounted equipment. A copy of the proposed development plans are attached to this initial study (attachment 1). The applicant is requesting a height exception in accordance with Zoning Code Section 1500-18-050 to exceed the 100-foot height limit based on a justifiable need to provide colocation opportunities for multiple service providers that will provide sufficient coverage to the unincorporated community of Sutter. The tower will be structurally engineered to handle three carriers' equipment loads. The monopine tower is proposed to be disguised as a faux pine tree design intended to blend in with the surrounding landscape. The top of the monopine will be 120 feet in height, with the monopine branches reaching a height of 125 feet.

The tower would be located within a 70-foot by 70-foot (4,900-square-foot) ground space lease area, situated within an orchard on a parcel owned by the Sutter Union High School District. The site is adjacent to Sutter Union High School. The tower is proposed in the northern portion of the parcel, north of an existing gravel parking lot. Ground equipment would be contained within a 50-foot by 50-foot (2,500-square-foot) screened enclosure at the base of the tower. The project would require removal of approximately 16 orchard trees and associated minor grading work to construct the tower, lease area, and utility undergrounding. No other trees will be removed to accommodate this project. Access to the site would occur through an existing driveway on Acacia Avenue and gravel road through the northern portion of Sutter Union High School which currently provides access to the high school's recreational fields. This access would be provided by a proposed 20-foot-wide non-exclusive access easement. A Fire Department Knox Box will be located at the

facility's access gate. Additionally, a 2A:20BC Rated Fire Extinguisher in a weather resistant cabinet will be mounted inside the fenced compound. A 20-foot-wide non-exclusive access and utility easement is also proposed along the southern end of the orchard from Acacia Avenue to the proposed tower, which will provide secondary access and will allow the installation of power and fiber optic cable to service the facility.

The facility will operate 24 hours a day seven days a week. Maintenance workers will visit the site approximately once a month to once a quarter. Ground based emergency diesel generators are proposed for each of the three future collocated carriers. Diesel fuel is proposed to be stored in double walled belly tanks. There will be minimal noise from the emergency standby generators, turning on once a week for 15 minutes for routine maintenance purposes limited to Monday through Friday between 8:00am and 7:00pm and during emergency power outages. The facility compound will be surfaced with gravel that will have adequate drainage. No lighting is proposed to be located on the tower. A technician light on sensors and a timer might be installed adjacent to ground equipment. The facility is proposed to be constructed within approximately 2-3 months. The tower and enclosure area has been designed to accommodate multiple service carriers to reduce or eliminate the need for additional standalone towers to provide coverage to the surrounding community. The project will provide additional wireless service coverage for the surrounding area.

9. Surrounding land uses and setting: The project site is located within the northern portion of the County, within the unincorporated community of Sutter, which lies southeast of the Sutter Buttes. The parcel is located at the northwest corner of Griffith Lane and Acacia Avenue. The proposed tower would be constructed on land owned by the Sutter Union High School District, which is developed with Sutter Union High School and an orchard situated at the northern end of the parcel. The site lies approximately 514 feet west of Acacia Avenue and approximately 715 feet south of the parcel's northern property line. Surrounding uses consist of single-family residences and a church to the north, single-family residences to the south, single-family residences, public swimming pool, public hall, and baseball field to the east, and Sutter Union High School District property, baseball field, and rural residential and agricultural uses to the west.

North: single-family residences, church; South: single-family residences; East: single-family residences, public swimming pool and hall with baseball field; West: Sutter Union High School District property, baseball field, rural residential and agricultural uses.

10. Other public agencies whose approval is required: None

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.? The County initiated Assembly Bill 52 (AB 52) consultation through distribution of letters to the Native American tribes provided by the Native American Heritage Commission (NAHC). No requests for consultation were received from any Native American tribes during the review period.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ **I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.**

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Applicant Mitigation Agreement:

CEQA allows a project proponent to make revisions to a project, and/or to agree and comply with, mitigation measures that reduce the project impacts such that the project will not have a significant effect on the environment. CEQA Guidelines Section 15064.

As the applicant/representative for this proposed project, I hereby agree to implement the proposed mitigation measures and mitigation monitoring program identified within this document.

Signature of Applicant/Representative — Date: 07/26/23
TIMOTHY J. COTTER

Robby Thacker
Contract Planner — Date: 7/26/23

Neal Hay, Director of Development Services
Environmental Control Officer — Date: 7/26/23

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

Responses:

a) **Less than significant impact.** This project will not have a substantial adverse effect on a scenic vista. The General Plan Technical Background Report identifies geographic features such as the Sutter Buttes, Feather River, Sacramento River, Bear River, and the valley's orchards as scenic resources within the County, which contribute to the County's character. Additionally, the Land Use Element of the General Plan contains specific goals and policies directed at preservation of scenic resources and enhancing design of new development. This project is not located in the immediate vicinity of the Bear River, Feather River, or Sacramento River. This project is not located within the Sutter Buttes Overlay Zone; however, it is located in close proximity of open rangeland near the base of the Sutter Buttes. The establishment of a new 125-foot-tall telecommunications tower would slightly obscure various public viewpoints of the Sutter Buttes along Acacia Avenue due to the proposed height of the tower. However, the tower would consist of a slender design that would limit the extent of which the tower would screen views and would be considered less than significant. Additionally, the proposed tower is consistent with the following policies of the Sutter County General Plan.

- General Plan Policy LU 4.8.b (Quality New Development) – Enhance scenic views to the Sutter Buttes, rivers, agricultural lands, and other visual resources through project siting and design.

- General Plan Policy LU 4.23.i, e (Commercial and Industrial Development) – Screen utilities, HVAC units, waste collection and other similar areas from public view.

The tower and ground equipment are proposed to be set back approximately 514 feet from the adjacent public street (Acacia Avenue) and sited away from residential development, reducing the visibility of the tower from adjacent residential parcels and public streets. The tower has also

been designed to be concealed utilizing a faux pine tree design theme. This is done to camouflage the tower and blend it with existing pine trees located to the north of the project site, and to soften the industrial appearance of the tower and affixed equipment including antennas and wiring. The materials used to conceal the tower include the use of synthetic branches and leaves in conjunction with green or neutral color tones and antenna socks. Screening of the ground equipment would be accomplished through use of a 6-foot-tall cyclone fence with vinyl slats, and through the siting of the ground lease area which would be set back approximately 494 feet from Acacia Avenue. The parcel is currently used as an orchard and would provide additional screening of the tower and ground equipment from area residences. Considering the proposed faux tower concept and ground equipment enclosure screening, 494± foot setback from the adjacent public roadway and siting of the tower away from nearby residences, the proposed tower would have a minor impact on views of the Sutter Buttes from various viewpoints and from Acacia Avenue. Therefore, a less than significant impact would occur.

b) **No impact.** This project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway because there are no state scenic highway designations in Sutter County. The project site is located along Acacia Avenue, a residential street within the unincorporated town of Sutter. The project site contains an existing almond orchard, of which approximately 16 orchard trees (non-heritage) will require removal to construct the tower and enclosure area. No impact is anticipated.

c) **Less than significant impact.** The proposed project is located in a nonurbanized area and will not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The proposed project is located in the unincorporated town of Sutter, which is characterized as a small grid network of residential and commercial uses near the base of the Sutter Buttes. The tower is proposed near Sutter Union High School on land owned by the School District, in the northwest area of the town of Sutter. The surrounding area is largely rural and features mostly orchards and scattered single-family residences. As discussed in Section A above, the project is consistent with General Plan Policy LU 4.8.b, which requires new development to incorporate siting and design considerations in an effort to enhance scenic quality. Photo simulations are attached to this initial study, which provide before and after views of the tower from various locations (attachment 2). The proposed tower is proposed to be sited away from residences and setback approximately 514 feet from Acacia Avenue to reduce impacts on scenic quality. The applicant has also designed the tower to be concealed as a faux pine tree, in an effort to camouflage and blend the tower in with the surrounding landscape, including existing pine trees located to the north of the tower location. The proposed screening material for the tower will allow it to blend into the skyline and surrounding lands.

Sutter County Zoning Code Article 18 regulates wireless communication facilities and siting to encourage the appropriate location and development of wireless communication facilities. The proposed project meets applicable development and siting standards included in Article 18, which include colocation requirements, minimum setbacks, height requirements, and screening. This project is designed for collocation in order to reduce adverse visual impacts by having one facility versus multiple facilities. The proposed tower is setback approximately 514 feet from the closet property line so it meets the minimum setback of 125-feet. The applicant is requesting a height exception to exceed the 100-foot height limit based on a justifiable need to provide colocation opportunities for multiple service providers. The proposed tower will include camouflage technology and ground equipment will be screened. The tower location and proposed design will not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and is consistent with the County's regulations regarding scenic quality. Therefore, a less than significant impact is anticipated.

d) **Less than significant impact.** This project will not create a new source of substantial light or glare which will adversely affect day or nighttime views in the area. The area of the project has moderate levels of ambient lighting predominately from school buildings and facilities, residential uses, recreational uses, and vehicle headlights on County roads. The proposed tower and ground equipment will not contain any reflective surfaces that would generate glare. No lighting is proposed to be on the tower and no tower lights will be required to be installed by the Federal Aviation Administration (FAA). The only lighting that may be installed at the site is a technician light to be installed at the ground level that will be on sensors and a timer to support ground-based equipment maintenance. This is low level lighting that will only be illuminated when a technician is working at the facility. Once the work is completed, the timer will shut the lighting off. This lighting would be screened by the proposed screened enclosure. As a result, it is not anticipated that this project will create a new source of substantial light or glare in this area. A less than significant impact is anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)
(County of Sutter, Zoning Code. 2022)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Responses:

a) **Less than significant impact**. This project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to a non-agricultural use. As shown on the 2018 Sutter County Important Farmland map, the northern 23± acres of the approximate 59-acre parcel is designated as "Prime Farmland." The northern end of the parcel contains an existing almond orchard and has been used for agricultural purposes in the past. The proposed project will construct a 125-foot tall tower and associated ground equipment within a 2,500-square-foot enclosure located within a 4,900-square-foot lease area. The project site is zoned Public (P) as it is part of the Sutter Union High School property. The proposed improvements will require the removal of approximately 16 almond trees to accommodate the tower and nominally sized ground equipment area of 2,500 square feet; however, the existing agricultural use of the site (orchard) will not be converted to a non-agricultural use and will remain primarily agriculture. As a result, a less than significant impact is anticipated.

b) **No impact**. This project will not conflict with existing zoning for agricultural uses or a Williamson Act contract. The project site is zoned Public, and it not zoned for agricultural use. The project site is not encumbered by a Williamson Act contract. The project site is currently zoned for public facilities and other related and supportive uses. No impact is anticipated.

c) **No impact.** This project does not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)), because the project site and surrounding area does not contain forest land. The project site is not zoned for forest land or timberland nor is it adjacent to land that is zoned for forest land or timberland and no rezoning of land is proposed as part of this project. This project is located in the Sacramento Valley, a non-forested region. No impact is anticipated.

d) **No impact.** This project will not result in the loss of forest land or conversion of forest land to a non-forest use because of its location within Sutter County. Sutter County is located on the valley floor of California's Central Valley, and, as such, does not contain forest land. No impact is anticipated.

e) **No impact.** This project will not involve other changes to the existing environment which could result in the conversion of farmland to a non-agricultural use or conversion of forest land to a non-forest use. This project does not include land being converted from farmland to a non-agricultural use or forest land to non-forest use. The project proposes to construct a telecommunications

tower and associated ground equipment within a portion of an existing orchard. The existing orchard will remain and continue in operation with establishment of the proposed tower. The project will provide additional communications service to the surrounding area and will not result in the conversion of other agricultural lands to non-agricultural use. Therefore, no impact is anticipated.

(California Dept. of Conservation, Farmland Mapping and Monitoring Program. 2018)

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

Responses:

a) **Less than significant with mitigation incorporated.** This project would not conflict with or obstruct implementation of an applicable air quality plan. Both the federal and State governments have established ambient air quality standards, based on their respective Clean Air Acts, for various air pollutants identified as “criteria” air pollutants. The federal Clean Air Act identifies six criteria pollutants: reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO), sulfur dioxide, lead, and particulate matter less than 10 micrometers in diameter (PM_{10}), a subset of which is particulate matter less than 2.5 micrometers in diameter (PM2.5). The California Clean Air Act identifies these six federal criteria pollutants, along with four others.

Under both Clean Air Acts, air basins are classified as being in “attainment” or “nonattainment” of these ambient air quality standards, or they are “unclassified.” Any air district that has been designated as a nonattainment area relative to federal and/or State ambient air quality standards for ozone, CO, sulfur dioxide or nitrogen dioxide is required to prepare and submit a plan for attaining and maintaining the standards for which it is in nonattainment.

The project site is within the boundaries of the Feather River Air Quality Management District (FRAQMD), which covers both Sutter and Yuba Counties. The FRAQMD is either in attainment of or unclassified for all federal and State ambient air quality except for federal standards for ozone and PM10. Portions of Sutter County are also in nonattainment of State standards for

ozone. The FRAQMD, in cooperation with other air districts in the northern Sacramento Valley, has prepared the Northern Sacramento Valley Planning Area Air Quality Attainment Plan for the attainment of State ozone standards. Plans have also been prepared for the attainment of federal ozone and PM10 standards.

According to the FRAQMD 2010 Indirect Source Review Guidelines, Significant Impact Thresholds are triggered by the construction of 130 new single-family residences, 225,000 square feet of new light industrial space, or 130,000 gross square feet of new office space. The project is minor in terms of the proposed scope, and consists of the construction of a telecommunications tower, ground equipment, and enclosure. Therefore, it does not meet the criteria of work that would trigger an established threshold of significance.

The proposed project will be installing three emergency standby generator units one for each of the network providers. These generators would only operate as part of periodic maintenance testing and/or in the event of an emergency power loss. FRAQMD reviewed the proposed project and stated that each generator will need to have their engines evaluated for a FRAQMD permit prior to the start of installation and operation. The applicant will be required to submit an Authority to Construct application and supplemental form, which will be completed during the building permit process.

Short-Term Construction Impacts

Construction activities for the proposed project would emit criteria air pollutants from a variety of activities, including operation of heavy equipment and use of worker vehicles, vendor trucks, and hauling trucks. Emissions of ozone precursors (ROG and NOx) are primarily generated by mobile sources and largely vary as a function of vehicle trips per day and the type, quantity, intensity, and frequency of heavy-duty, off-road equipment used. Typically, a large portion of construction-related ROG emissions results from the application of asphalt on to parking areas, and the application of architectural coatings. Construction-related fugitive dust emissions of PM_{10} would vary from day to day, depending on the level and type of activity, silt content of the soil, and the weather.

Based on the minor nature of the scope of the project, consisting of the construction of a 125-foot tall tower, placement of ground equipment, enclosure, and power and fiber optics cable runs, estimated construction emissions of NOx, ROG, and PM_{10} generated during construction is not expected to exceed FRAQMD thresholds of significance. Therefore, project construction activities will not interfere with the implementation of air quality attainment plans for ozone or PM_{10}. Project construction impacts on air quality will be less than significant.

The FRAQMD considers a project with no operational phase a Type-2 project. A Type-2 project is considered less than significant if the averaged project life emissions do not exceed 25 lbs/day of NOx or ROG, and the daily emissions of PM_{10} does not exceed 80 lbs/day. Projects that qualify as a Type-2 project should implement the Standard Mitigation Measures, applied below as a project mitigation measure.

> **Mitigation Measure No. 1 (Air Quality):** The project applicant shall implement the following FRAQMD-recommended Standard Mitigation Measures for projects that do not exceed construction or operational thresholds of significance.
>
> - Implement the Fugitive Dust Control Plan prior to any on-site grading, landscaping, or construction activities. The applicant shall submit the fugitive dust control plan

to the FRAQMD for review and approval. A copy of the approved plan shall be submitted to the Development Services Department.

- Construction equipment exhaust emissions shall not exceed FRAQMD Regulation III, Rule 3.0, Visible Emissions limitations (40 percent opacity or Ringlemann 2.0).
- The contractor shall be responsible to ensure that all construction equipment is properly tuned and maintained prior to and for the duration of onsite operation.
- Limit idling time to 5 minutes – saves fuel and reduces emissions in accordance with 13 California Code of Regulations (CCR) Chapter 10 Section 2485 and 13 CCR Chapter 9 Article 4.8 Section 2449.
- Utilize existing power sources or clean fuel generators rather than temporary power generators.
- Develop traffic plans to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
- Portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, may require CARB Portable Equipment Registration with the State or a local district permit. The owner/operator shall be responsible for arranging appropriate consultation with CARB or FRAQMD to determine registration and permitting requirements prior to equipment operation at the site.

Overall, because this project would not generate emissions above FRAQMD's thresholds of significance for construction and operational activities and would implement the relevant mitigation listed above, a less-than-significant impact on air quality is anticipated.

b) **Less than significant impact.** Neither construction nor operation of the proposed project would generate emissions that would exceed the FRAQMD thresholds of significance, and the project would implement the FRAQMD recommended Standard Mitigation Measures. Therefore, the project would not result in a significant net increase of criteria air pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. A less-than-significant impact is anticipated.

c) **Less than significant impact.** This project would not expose sensitive receptors to substantial pollutant concentrations. The nearest potential sensitive receptor are residences located over 600 feet to the east, residences located over 700 feet to the north, and school buildings over 300 feet to the south. As discussed in a) above, project construction and operational emissions would not exceed FRAQMD significance thresholds. As such, the nearby sensitive receptors would not be exposed to substantial amounts of pollutant emissions, especially when Mitigation Measure No. 1 is implemented.

The project would generate short-term construction emissions of diesel particulate matter (DPM), which is considered a toxic air contaminant that could lead to increased cancer risk with prolonged exposure. DPM emissions would be generated by the operation of off-road construction equipment (e.g., excavators, loaders, cranes, graders) and on-road diesel heavy-duty vehicles.

Toxic air contaminant emissions are considered significant if the emissions lead to a cancer risk of 10 cancers per million people and the Non-Cancer Hazard Index is 1.0. The project construction and operational emissions would be well below the significance thresholds for cancer risk.

In summary, construction and operational emissions from the proposed project would not generate substantial criteria pollutant emissions, nor would it generate DPM emissions that would pose a substantial health risk to nearby sensitive receptors. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations, and the impact is considered less than significant.

d) **No impact.** This project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. FRAQMD has identified various types of facilities that are known sources of odors, including wastewater treatment plants, sanitary landfills, painting/coating operations, food processing facilities, and green waste and recycling operations. The proposed project would not include operation of any of these types of odor-generating facilities. The project would not be anticipated to generate odors that would affect a substantial number of people. Therefore, no impact is anticipated.

(Feather River Air Quality Management District, Indirect Source Review Guidelines. 2010)
(County of Sutter, General Plan 2030. 2011)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Responses:

a) **Less than significant impact.** This project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS). The General Plan EIR assessed the presence of special-status species in Sutter County through a search of the California Natural Diversity Database maintained by CDFW. The results indicate no candidate, sensitive, or special-status species identified as potentially occurring onsite or in the immediate area. According to current California Natural Diversity Database data, there are no candidate, sensitive, or special status species identified as potentially occurring onsite or in the immediate area. There are no existing onsite roadside ditches located along Acacia Avenue or waterways either onsite or in the immediate vicinity that may provide connectivity for listed species. The project area is level and there are no major drainage canals or streams or river in the immediate vicinity. According to the General Plan Technical Background Report, agricultural lands, such as orchards, are of limited use to wildlife due to the level of disturbance related to crop management and are typically devoid of native plant species. This project was circulated to CDFW for review and they did not provide any comments. In addition, the USFWS Critical Habitat Mapper indicated no critical habitat for any species listed under the federal Endangered Species Act within the project site and vicinity. The project site is currently used as an almond orchard and no special status species or sensitive habitats are present on-site. As a result, a less than significant impact is anticipated.

b) **No impact.** This project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. There are no streams or rivers on the project site or in the immediate vicinity. No riparian habitat or other sensitive natural community exists onsite or near the property. The site has been previously disturbed and is located just north of Sutter Union High School. No impact is anticipated.

c) **No impact.** This project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means because there are no known wetlands located within the project site or vicinity. In addition, no wetlands are located at the project site according to the National Wetlands Inventory of the U.S. Fish and Wildlife Service. No impact is anticipated.

d) **Less than significant impact.** This project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of a native wildlife nursery site. The project is not anticipated to significantly interfere with wildlife movement since the site has historically been used as an orchard and is surrounded by a mix of residential, agricultural, and public facilities (high school). The property is not located near any rivers or streams that would provide fish movement corridors. Only orchard and ornamental trees are in the project vicinity, which are not considered desirable nesting sites for migratory birds. A less than significant impact is anticipated.

e) **No impact.** This project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance because Sutter County has not adopted such an ordinance. Sutter County has not adopted a tree preservation ordinance; however, General Plan Policy ER 3.7 is in place to preserve native oak trees when possible through the review of discretionary development projects and activities. A single oak tree is located along the southern boundary of the almond orchard, which will remain in place. A 20-foot-wide non-exclusive access and utility easement is proposed on the south side of this oak tree and will not result in the removal of the oak tree. No impact is anticipated.

f) **No impact.** The proposed project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan because a plan has not been adopted that affects this project site. Therefore, no impacts are anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)
(California Department of Fish and Wildlife, California Natural Diversity Database)
(U.S. Fish and Wildlife Service, National Wetlands Inventory, 2023)

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

Responses:

a-b) **Less than significant impact with mitigation incorporated.** The proposed project would not cause a substantial adverse change in the significance of a historical resource or archaeological resource pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15064.5. In Section 4.6 of the General Plan Technical Background Report, Figure 4.6-1 does not list the property as being a historic site. The site is not listed on the National Register of

Historic Places. There are no unique features or historical resources located on the project site and the project does not propose the removal of the existing buildings. The project site is not located within the vicinity of the Bear River, Sacramento River, or Feather River, where archaeological resources are more likely to occur. There is no evidence on the project site indicating that historical or archaeological resources exist.

The project site has been and continues to be used for agricultural purposes. Since the property has been extensively disturbed to varying depths due to agricultural uses, it is unlikely that any intact cultural resources exist. Nevertheless, it is conceivable that archaeological resources could be encountered during project construction. To mitigate potential impacts, a mitigation measure is proposed to prevent disturbance of human remains should they be encountered.

> **Mitigation Measure No. 2 (Cultural Resources):** If archaeological resources are discovered on the project site, potential ground disturbing activities within 100 feet of the find shall be halted immediately and the Development Services Department shall be notified. A qualified archaeologist shall examine the find and evaluate its significance. The archaeologist shall recommend measures needed to reduce effects on the cultural resource in a written report to the County. The County shall be responsible for implementing the report recommendations.

c) **Less than significant impact with mitigation incorporated.** The proposed project is not expected to disturb any human remains, including those interred outside of dedicated cemeteries. The property is not located adjacent to a cemetery. The project site is not located within the vicinity of the Bear River, Sacramento River, or Feather River, where burials are more likely to occur.

However, there is the potential to unearth human remains during project construction ground disturbing activities. California Health and Safety Code §7050.5 states that when human remains are discovered, no further site disturbance can occur until the County Coroner has made the necessary findings as to the origin of the remains and their disposition pursuant to Public Resources Code Section 5097.98. If the remains are recognized to be those of a Native American, the coroner would contact the Native American Heritage Commission (NAHC) within 24 hours.

Public Resources Code §5097.98 states that whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, it shall immediately notify the most likely descendent from the deceased Native American. The descendants may inspect the site and recommend to the property owner a means for treating or disposing the human remains. If the NAHC cannot identify a descendent, or the descendent identified fails to make a recommendation, or the landowner rejects the recommendation of the descendent, the landowner shall rebury the human remains on the property in a location not subject to further disturbance.
To mitigate potential impacts, a mitigation measure is proposed to prevent disturbance of human remains should they be encountered.

> **Mitigation Measure No. 3 (Cultural Resources):** If human remains are discovered on the site potentially ground disturbing activities within 100 feet of the remains shall be halted immediately, and the project applicant shall notify the Sutter County Coroner and Native American Heritage Commission (NAHC) immediately, according to Public Resources Code §5097.98 and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any,

identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.94.

(County of Sutter, General Plan Technical Background Report. 2008)
(National Park Service, National Register of Historic Places. 2023)

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

Responses:

a-b) **Less than significant impact.** The proposed project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This project proposes to construct a 125-foot tall telecommunications tower, ground equipment, and 2,500-square-foot fenced enclosure. The project also includes the installation of power and fiber optic cable to service the tower and an access easement to access the tower across a previously developed high school site.

Overall, the project would not require the creation of a new substantial source of energy generation. Construction of the tower, ground equipment, trenching and minor grading would require the consumption of diesel and gasoline to power construction equipment and delivery trucks. Construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency, combined with state regulations limiting engine idling times, would further reduce transportation fuel demand during project construction. There are no unusual construction processes that would be more energy-intensive than are used for comparable activities, and no equipment would be used that would not conform to current emissions standards and related fuel efficiencies. For these reasons, it is expected that fuel consumption associated with project construction would not be any more inefficient, wasteful, or unnecessary than other similar development projects of this nature within Sutter County.

No lighting is proposed to be on the tower and no tower lights will be required to be installed by the Federal Aviation Administration (FAA). The only lighting that may be installed at the site is a technician light to be installed at the ground level that will be on sensors and a timer to support ground-based equipment maintenance. This is low level lighting that will only be illuminated when a technician is working at the facility. Once the work is completed, the timer will shut the lighting

off. Lighting would be required to comply with the energy requirements of the State Building Codes, including the California Energy Code (Part 6 of Title 24) related to lighting design and installation, luminaire, and lighting controls. The energy efficiency standards of the State of California are some of the most stringent in the nation. As a result, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources, and a less than significant impact is anticipated.

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

Responses:

a) **Less than significant impact.** This project will not directly or indirectly cause potential substantial adverse effects from rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides because the subject

property is not located in an Alquist-Priolo Earthquake Fault Zone. Figure 5.1-1 in the General Plan Technical Background Report does not identify any active earthquake faults in Sutter County as defined by the California Mining and Geology Board. The faults identified in Sutter County include the Quaternary Faults, located in the northern section of the County within the Sutter Buttes, and the Pre-Quaternary Fault, located in the southeastern corner of the County, just east of where Highway 70 enters the County (Figure 5.1-1 of the General Plan Technical Background Report). Both faults are listed as non-active faults but have the potential for seismic activity. The project site is relatively level with no significant slope and is located outside of an area where documented faults exist. The project would involve minor grading activities that would not exacerbate existing seismic hazards in the region and is unlikely to be affected by earthquakes, liquefaction, or landslides in the region. Therefore, a less than significant impact is anticipated.

b) **Less than significant with mitigation incorporated.** This project will not result in substantial soil erosion or the loss of topsoil. According to the USDA Soil Survey of the County, a majority of the on-site soil consists of Olashes sandy loam. Olashes soils are generally located in the Sutter Buttes and southeastern part of the Sacramento Valley, on alluvial fans and fan terraces with slopes of 0 to 5 percent. Elevations typically range from 45 to 750 feet. These soils drain relatively well with very low runoff potential and moderately slow permeability. This soil is used mainly for irrigated orchards, small grain, and forage crops. Minor grading work will be required to construct the proposed tower, ground equipment, and access to the site. Subsequent site grading has the potential to result in soil erosion. If the project size is more than one acre, the applicant is required to prepare a Storm Water Pollution Prevention Plan (SWPPP) and obtain a National Pollution Discharge Elimination System (NPDES) General Construction Permit through the Regional Water Quality Control Board (RWQCB) to ensure that soil is not released in storm water from the project site. To ensure that a less than significant impact occurs, the following mitigation measure is included.

> **Mitigation Measure No. 4 (Geology and Soils):** STORM WATER QUALITY PROTECTION – DURING CONSTRUCTION.
>
> SWPPP - Prior to the start of construction, the applicant shall prepare and submit a Storm Water Pollution and Prevention Plan (SWPPP) if the project's cumulative disturbed area is one acre or more, to be executed through all phases of grading and project construction. The SWPPP shall incorporate Best Management Practices (BMPs) to ensure that potential water quality impacts during construction phases are minimized. These measures shall be consistent with the County's Improvement Standards and Land Grading and Erosion Control Ordinance and the requirements of the National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. The SWPPP shall be submitted to the County for review and to the Central Valley Regional Water Quality Control Board as required by the NPDES General Permit in effect during construction. During construction, the applicant shall implement actions and procedures established to reduce the pollutant loadings in storm drain systems. The project applicant shall implement BMPs in accordance with the SWPPP and the County's Improvement Standards. The project applicant(s) shall submit a state storm water permit Waste Discharger Identification (WDID) number for each construction project.
>
> If the project cumulative disturbed area is less than one acre, the applicant's engineer shall submit an engineer stamped letter along with a calculation certifying the cumulative disturbed area is less than one acre.

NPDES GENERAL CONSTRUCTION PERMIT - If the project size is one acre or more, the applicant shall file a Notice of Intent (NOI) with the Central Valley Regional Water Quality Control Board (CVRWQCB), prior to construction, to obtain coverage under the California State Water Resources - General Construction Activity Storm Water Permit. Permits are issued by the State Water Resources Control Board, which can provide all information necessary to complete and file the necessary documents. Applicant shall comply with the terms of the General Construction Permit, the County's ordinances, and the NPDES Waste Discharge Requirements for the Sutter County Phase II NPDES Permit.

c) **Less than significant impact.** This project is not located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. The project proposes the construction of a 125-foot tall tower with associated ground equipment and fenced enclosure that will require minor grading improvements and utilities to serve the tower. As stated above, the existing soil and relatively flat topography of the site makes the site suitable for the proposed tower and associated improvements and would not have a significant potential for landslide, subsidence, or liquefaction as a result of the project. A less than significant impact is anticipated.

d) **Less than significant impact.** This project is not located on expansive soil creating substantial direct or indirect risks to life or property. The soil types on the project site have a low to moderate shrink-swell potential; the proposed tower and associated improvements are minor in nature. Future construction will be required to comply with the adopted California Building Code, specifically Chapter 18 for soils conditions and foundation systems, to address potential expansive soils that may require special foundation design, a geotechnical survey, and engineering for foundation design. The Building Inspection Division will implement these standards as part of the building permit process. A less than significant impact is anticipated.

e) **No impact.** This project does not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Properties in the area of the project rely on the use of on-site septic tanks and leach field systems for the disposal of wastewater, as there is no sewer system available in the area. The proposed tower and ground equipment improvements do not require the installation of an on-site wastewater system; therefore, the project will have no impact as a result.

f) **Less than significant impact.** The proposed project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There are no known unique paleontological resources or unique geologic features located in the vicinity of the project. The project site consists of a high school and an almond orchard. The project will utilize an existing access through the high school and will require the removal of orchard trees to construct the tower and ground lease area. Implementation Program ER 8-D for policy ER 8.2 in the County General Plan requires that when paleontological resources are encountered, all work within 100 feet of the discovery shall be stopped and the area protected from further disturbance until the discovery is evaluated. The appropriate County personnel shall be notified immediately. The resource shall be examined by qualified personnel in accordance with the Society of Vertebrate Paleontology (SVP) guidelines to determine their significance and to develop appropriate protection and preservation measures. A less than significant impact is anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)
(USDA Soil Conservation Service, Sutter County Soil Survey. 1988)

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

Responses:

a) **Less than significant impact.** This project will not generate additional greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Sutter County is required to reduce greenhouse gas emissions to 1990 levels by the year 2020 consistent with State reduction goals in Assembly Bill (AB) 32. The Climate Action Plan (CAP) was prepared and adopted as part of the General Plan to ensure compliance with AB 32. Sutter County's CAP includes a greenhouse gas (GHG) inventory, an emission reduction target, and reduction measures to reach the target. The CAP also includes screening tables used to assign points for GHG mitigation measures. Projects that achieve 100 points or more do not need to quantify GHG emissions and are assumed to have a less than significant impact.

Sutter County's screening tables apply to all project sizes. Small projects with little or no proposed development and minor levels of GHG emissions typically cannot achieve the 100-point threshold and therefore must quantify GHG emission impacts using other methods, an approach that consumes time and resources with no substantive contribution to achieving the CAP reduction target.

Since the adoption of the CAP, further analysis to determine if a project can be too small to provide the level of GHG emissions reductions expected from the screening tables or alternative emissions analysis methods has been performed. In that study, emissions were estimated for each project within the Governor's Office of Planning and Research (OPR) database. The analysis found that 90 percent of carbon dioxide equivalent (CO_2e) emissions are from CEQA projects that exceed 3,000 metric tons CO_2e per year. Both cumulatively and individually, projects that generate less than 3,000 metric tons CO_2e per year have a negligible contribution to overall emissions.

Sutter County has concluded that projects generating less than 3,000 metric tons of CO_2e per year are not required to be evaluated using Sutter County's screening tables. Such projects require no further GHG emissions analysis and are assumed to have a less than significant impact.

Based on the GHG Pre-Screening Measures, construction of the proposed tower and associated ground equipment are "pre-screened out", which means it falls below the 3,000 metric tons threshold. Therefore, no further GHG emissions analysis is required, and a less than significant impact is anticipated.

b) **Less than significant impact**. This project will not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The project is within the boundaries of the Feather River Air Quality Management District (FRAQMD), which has not individually adopted any plans or regulations for reducing greenhouse gas emissions. However, FRAQMD adopted a document on August 7, 2015, through the Northern Sacramento Valley Planning Area and in collaboration with Butte County AQMD, Colusa County Air Pollution Control District (APCD), Glenn County APCD, Shasta County AQMD, and Tehama County APCD, titled the 2015 Triennial Air Quality Attainment Plan. This document provides thresholds given by some of the AQMDs and APCDs, and the thresholds given by FRAQMD from 2010, which are described and analyzed in the Air Quality impact section, still apply to Sutter County. In addition, the County has adopted a Climate Action Plan (CAP) that details methods to reduce greenhouse gas emissions. This project will not conflict with the CAP because it was determined to be exempt from its requirements as discussed in Section a) above so a less than significant impact is anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)
(County of Sutter, General Plan 2030 Climate Action Plan. 2011)
(County of Sutter, Greenhouse Gas Pre-Screening Measures for Sutter County. June 28, 2016.)
(Sacramento Valley Air Quality Engineering and Enforcement Professionals (SVAQEEP), Northern Sacramento Valley Planning Area 2015 Triennial Air Quality Attainment Plan. 2015)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Responses:

a-b) **Less than significant impact.** This project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or the creation of 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. The Development Services Environmental Health Division is the Certified Unified Program Agency (CUPA) for Sutter County with responsibility for the administration of the "Unified Hazardous Waste and Hazardous Materials Management Regulatory Program" (Unified Program). The proposed tower and associated structures would not involve the routine transport, use, disposal, or generation of substantial amounts of hazardous materials during project operation. Ground equipment may contain small amounts of battery acid that would be installed and operated in accordance with manufacturer instructions. Additionally, emergency generators will be installed within the ground lease area that would be secured within a locked fenced enclosure and would be used only a temporary basis during emergency events when there is loss of power.

During project operation, the proposed wireless communications system would emit radio frequency electromagnetic energy (RF-EME) in the project vicinity. For RF-EME sources such as the proposed antennas, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. The MPE limits for RF-EME emissions are designed to provide a substantial margin of safety. The 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. The proposed tower would not be manned during operations and safety measures would be taken during maintenance of the tower or ground equipment. The applicant submitted a radio frequency analysis report (prepared by Site Safe, dated June 30, 2023) as part of the application, which analyzed the radiofrequency emissions assuming full build-out of the facility at full power. A copy of this report has been attached to this initial study (attachment 3). The analysis determined that public exposure from the facility would be less than 1% of the allowed General Public MPE limits. According to the analysis, the antennas that would be installed on the tower would be oriented to project energy toward the horizon and would not impact the general public at the ground level, and therefore would not subject the public to excessive levels of radio frequency emissions as regulated by the FCC. Therefore, a less than significant impact would occur.

c) **Less than significant impact.** This project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Sutter Union High School is located immediately south of the project site; however, the proposed tower will not emit hazardous emissions or involve use of hazardous materials that may impact the school. Radio frequency emissions from the tower would project

toward the horizon and would not impact the general public or the school site as documented by the radio frequency analysis (attachment 3). The batteries and emergency generator would be secured within equipment cabinets and within a locked fenced enclosure. The generator would only be used during emergency events such as during a loss of power and will not be a significant source of emissions. A less than significant impact is anticipated.

d) **No impact.** This project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5. As a result, the project will not create a hazard to the public or the environment; therefore, no impact is anticipated.

e) **No impact**. This project is not 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; therefore, this project will not result in a safety hazard or excessive noise for people residing or working in the project area. The nearest public airport is the Sutter County Airport, which is located over eight miles southwest of the project site. Due to the project's distance from these facilities, no impacts are anticipated.

f) **Less than significant impact.** This project will not impact the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan because the project site has adequate frontage on Acacia Avenue, which is of sufficient size to not impede necessary emergency responses. This project does not generate any significant traffic and the project location will not interfere with emergency access or response through the town of Sutter or to Sutter Union High School. This proposed project does not pose a unique or unusual use or activity that would impair the effective and efficient implementation of an adopted emergency response or evacuation plan. A less than significant impact is anticipated.

g) **Less than significant impact.** This project will not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. The General Plan indicates the Sutter Buttes and the "river bottoms," or those areas along the Sacramento, Feather, and Bear Rivers within the levee system, are susceptible to wildfires since much of the areas inside the levees are left in a natural state, thereby allowing combustible fuels to accumulate over long periods of time. The area has existing fire protection services. Since this property is not located in the Sutter Buttes or "river bottom" areas, a significant risk of loss, injury, or death associated with wildland fires as a result of the proposed project is not anticipated and is considered less than significant.

(County of Sutter, General Plan Technical Background Report. 2008)
(California Department of Toxic Substances Control, Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). 2022)
(SiteSafe, Radio Frequency (RF) Site Compliance Report. 2023)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Responses:

a) **Less than significant impact.** This project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Construction of the proposed tower and ground equipment would require minimal ground disturbing activities including grading and tree removal. The Central Valley Regional Water Quality Control Board (CVRWQCB) regulates stormwater discharges associated with construction activities where clearing, grading, or excavation results in land disturbance of one or more acres. If this project disturbs one acre or more, it would be subject to permit requirements of the CVRWQCB (Mitigation Measure 4). Additionally, the project will not utilize any water supplies and therefore will not generate discharges of stormwater or wastewater from the site that could degrade surface or groundwater quality. A less than significant impact is anticipated.

b) **Less than significant impact.** This project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The General Plan Technical Background Report indicates the property is provided with groundwater by the Sutter Subbasin. Water levels in the Sutter Subbasin have remained approximately 10 feet below ground surface and California's Groundwater Bulletin 118 prepared by the California Department of Water Resources

indicates municipal and irrigation wells withdraw groundwater at a rate of 500-2000 gallons per minute. The proposed project will not be served by a public water supply or groundwater well. Impervious surfaces within the ground lease area would be limited to foundation pads for equipment cabinets and generators. The majority of the site would include pervious surface materials to allow onsite percolation to occur. Based on the above, the proposed project would not substantially decrease groundwater supplies or groundwater recharge. A less than significant impact is anticipated.

c) **Less than significant impact**. This project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site or substantially increase the rate or amount of surface runoff in a manner resulting in flooding on or off-site. This project will also not contribute runoff water which will exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff or impede or redirect flood flows.

There are no streams or rivers on or in the immediate vicinity of the project site that could be altered by this project. The site is level and has been previously graded and disturbed for agricultural purposes. Additionally, no grading or alteration of the existing terrain that would direct additional water to County roads or to adjacent lots will occur. A less than significant impact is anticipated.

d) **No impact.** This project will not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. The project is not located within a FEMA designated flood zone. The project consists of a tower and associated ground equipment and emergency diesel generators as build-out of the tower occurs with multiple service carriers. Pollutants associated with the project would consist of batteries and diesel fuel however, the risk of release of pollutants in the event of inundation is low as the site is not located adjacent to or near any water bodies of sufficient size to create such situations. No impact is anticipated.

e) **No impact.** This project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The County, along with other agencies, has prepared the Sutter Subbasin Groundwater Sustainability Plan that covers most of Sutter County, including the project site. The project is not expected to interfere with implementation of the Groundwater Sustainability Plan, particularly since the project would not generate water demand. No impact is anticipated.

(California Department of Water Resources (DWR), California's Groundwater – Bulletin 118 (Update 2003). 2003)
(County of Sutter, General Plan Technical Background Report. 2008)
(Federal Emergency Management Agency, Flood Insurance Rate Map. 1988)
(Sutter Subbasin Groundwater Management Coordination Committee, Sutter Subbasin Groundwater Sustainability Plan. 2022)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Responses:

a) **No impact.** This project will not physically divide an established community. The proposed project will construct a 125-foot tall telecommunications tower and ground equipment within an existing almond orchard. The tower will improve wireless communications service to the immediate and surrounding area including existing residential neighborhoods and public schools. This project will not result in a physical barrier that will divide a community so no impact is anticipated.

b) **Less than significant impact.** This project will not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The County has not adopted any land use plan, policy, or regulation for the purpose of avoiding or mitigating a specific environmental effect that affects this project.

The County had adopted regulations governing the siting and design of wireless telecommunication facilities, provided in Chapter 1500-18 (Wireless Telecommunications Facilities) of the County Code. The proposed facility has been designed to comply with the prescribed development standards of the County Code as summarized below.

- The tower and lease area are sized and designed to accommodate multiple service carriers to support facility colocation.
- The tower has been set back from adjacent properties a distance at least the height of the tower.
- The height of the tower at 125 feet exceeds the maximum height standard of 100 feet; however, the County Code allows an exception to the height based upon a justifiable need to facilitate colocation. The proposed tower height is necessary to allow multiple service carriers to provide coverage to the surrounding community.
- The tower proposes a camouflaging system to be incorporated into the design of the tower to mimic a faux pine tree design as required by County Code.
- The proposed ground equipment will be screened within a fenced enclosure with slats and will be sited 514 feet from Acacia Avenue, and will be heavily screened from public view.
- No landscaping is proposed as part of the design as the site is developed as an orchard and is set back a significant distance from a public roadway. The incorporation of landscaping into the design would not constitute a beneficial aesthetic or practical improvement based on the location and setting of the proposed location.
- The facility and future placement of emergency generators within the site would be sited more than 600 feet from any residential dwellings and would incorporate noise attenuating enclosures if required to meet minimum noise standards to the nearest sensitive receptor.

The proposed project is consistent with the goals and policies of the General Plan and County Code and will not conflict with any adopted plan affecting the site. Where necessary, mitigation

has been incorporated into the project and no additional mitigation measures are necessary. A less-than-significant impact is anticipated.

(County of Sutter, General Plan 2030. 2011)
(County of Sutter, General Plan Technical Background Report. 2008)
(County of Sutter, Zoning Code. 2022)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
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?	☐	☐	☐	☒

Responses:

a-b) **No impact.** This project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. The General Plan and State of California Division of Mines and Geology Special Publication 132 do not list the site as having any mineral deposits of a significant or substantial nature, nor is the site located in the vicinity of any existing surface mines. No impact is anticipated.

(California Department of Conservation, Division of Mines and Geology, Special Report 132: Mineral Land Classification: Portland Cement Concrete-Grade Aggregate in the Yuba City-Marysville Production-Consumption Region. 1988)
(County of Sutter, General Plan Technical Background Report. 2008)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Responses:

a-b) **Less than significant with mitigation incorporated.** This project will not result in a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinances, or applicable standards of other agencies. This project will also not result in excessive groundborne vibration or groundborne noise levels. The Sutter County General Plan Noise Element provides a basis for local policies to control and abate environmental noise and to protect the citizens of Sutter County from excessive noise exposure. The Sutter County Noise Ordinance (Article 21.5 of the Zoning Code) establishes standards and procedures to protect the health and safety of County residents from the harmful effects of exposure to excessive, unnecessary, or offensive noise. The proposed project is required to operate in a manner that complies with the noise ordinance.

Construction of the proposed tower and associated ground equipment will result in temporary increases in ambient noise levels or vibrations; however, once construction is complete, ambient noise levels and vibration should return to a level that will not exceed any standards. The project will result in the construction and operation of a 125-foot tall telecommunications tower capable of supporting multiple service carriers and associated ground equipment. Ongoing operation of this facility will not be a significant source of noise generation and any operation of diesel generators would strictly be limited to emergency use only.

Sutter County does not establish quantitative noise limits for construction activities occurring in the County. During project construction, exterior noise levels could affect the nearby existing sensitive receptors in the vicinity. Per Policy N 1.6 of the County's General Plan, all project-related noise-generating construction activities within 1,000 feet of noise-sensitive uses (i.e., residential uses, daycares, schools, convalescent homes, and medical care facilities) are limited to daytime hours between 7:00 a.m. and 6:00 p.m. on weekdays, 8:00 a.m. and 5:00 p.m. on Saturdays, and prohibited on Sundays and holidays unless permission for the latter has been applied for and granted by the County. To ensure compliance with General Plan Policy N 1.6, the following mitigation measure is proposed. Compliance with this mitigation measure would make construction noise impacts less than significant.

> **Mitigation Measure No. 5 (Noise):** During construction, the applicant shall ensure that all project related noise-generating construction activities are limited to daytime hours between 7:00 a.m. and 6:00 p.m. on weekdays, 8:00 a.m. and 5:00 p.m. on Saturdays, and are prohibited on Sundays and holidays unless permission for the latter has been applied for and granted by the County.

c) **No impact.** This project is not located within the vicinity of a private airstrip, public airport, or public use airport; therefore, it will not result in excessive noise levels for people residing or working in the project area. The nearest public airport is the Sutter County Airport, which is located over eight miles southeast of the project site. The closest private airstrip is located over two miles

southeast of the project site. The project will result in the construction of an unmanned telecommunications tower and would not be impacted by noise from airports. No impact is anticipated.

(County of Sutter, General Plan 2030. 2011)
(County of Sutter, General Plan Technical Background Report. 2008)

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

Responses:

a) **No impact.** This project will not induce substantial unplanned population growth in an area, directly or indirectly. The project will construct a 125-foot-tall telecommunications tower and associated ground equipment capable of supporting multiple service carriers. The tower is anticipated to provide wireless communication service coverage to the immediate and surrounding areas. The project would not construct infrastructure that would be a catalyst for unplanned population growth. The project is intended to serve the existing population and fill existing service coverage gaps that exist within wireless networks serving the area. Therefore, no impact is anticipated.

b) **No impact.** This project will not displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere. The site contains no existing residential structures and is used for agricultural purposes (almond orchard). The proposed tower will be located within the existing orchard and will not displace housing in the surrounding area. No impact is anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Responses:

i-v) **No impact.** The relevant CEQA threshold is whether the proposed project would precipitate the need for new or physically altered facilities to meet response times or other performance objectives, the construction of which could cause environmental impacts. The proposed project would not increase the need for public services, as it would involve the construction of a wireless communication facility, which would not be manned during operation. The project received a letter of support by Sutter County Sheriff's Department, stating the need for improved communication infrastructure within the Sutter area, that would be achieved with the construction of the tower and subsequent service carriers that would locate their facilities at the site. The project would not involve the extension of major infrastructure associated with water, sanitary sewer, storm drainage, or energy services. Therefore, the project would not generate population growth, either directly or indirectly. Based on the above, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, and no impact would occur

(County of Sutter, Zoning Code. 2022)
(County of Sutter, General Plan Technical Background Report. 2008)

XVI. RECREATION.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Responses:

a-b) **No impact.** This project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated, nor will the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. This project does not propose recreational facilities or require expansion of existing recreational facilities. The proposed tower would be an unmanned facility and would not have a significant impact on parks or recreation facilities countywide. No impacts are anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)

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

Responses:

a-d) **Less than significant impact.** This project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project is proposed in an existing orchard approximately 514 feet west of Acacia Avenue within the community of Sutter. During construction, the project would generate minor

traffic associated with construction of the tower and ground equipment such as worker commutes and transportation of materials. The project does not involve any construction of roadways or extension of existing roadways. Access to the site would be accomplished by using an existing driveway and gravel road through the northern portion of Sutter Union High School which currently provides access to the high school's recreational fields. A secondary access route is proposed along the south side of the almond orchard. The project would not alter or increase demand for vehicle, bicycle, or pedestrian facilities or conflict with adopted circulation policies of the General Plan.

Construction activities would result in a temporary increase in vehicle miles traveled (VMT), however, operation and maintenance of the facility would have limited traffic generation due to periodic inspection, maintenance, and repairs which would result in a negligible increase in local or regional VMT. Further, the project would generate substantially less than 110 vehicle trips per day following construction (with most days having no vehicle traffic) and is screened out for additional VMT analysis per SB 743 guidelines.

Furthermore, because the proposed project would not alter the existing circulation network, the project would not substantially increase hazards due to a geometric design feature or incompatible uses or result in inadequate emergency access. The proposed tower would be located within an existing almond orchard and will have adequate emergency access through the existing access within Sutter Union High School. Traffic associated with the Sutter Union High School will be able to continue accessing the site without issue and will not be impacted from the construction of the tower which will be located north of the school grounds within an existing orchard.

(County of Sutter, General Plan Technical Background Report. 2008)

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

Responses:

i-ii) **Less than significant impact.** In September 2014, the California Legislature passed Assembly Bill (AB) 52, which added provisions to the Public Resources Code regarding the evaluation of impacts on tribal cultural resources under CEQA, and consultation requirements with California Native American tribes. The County initiated AB 52 consultation through distribution of letters to the seven (7) Native American tribes provided by the Native American Heritage Commission (NAHC) which include the Mechoopda Indian Tribe of Chico, Mooretown Rancheria of Maidu Indians, United Auburn Indian Community of the Auburn Rancheria, Strawberry Valley Rancheria, Enterprise Rancheria of Maidu Indians, Ione Band of Miwok Indians, and Wilton Rancheria. No requests for consultation were received from Native American tribes during the review period. The Mooretown Rancheria stated that they are not aware of any known cultural resources on the site. The property has been extensively disturbed to varying depths due to previous historical agricultural use and operations on the site. The project site is not located within the vicinity of the Bear River, Sacramento River, or Feather River. There is no evidence on the project site indicating that tribal cultural resources exist. A less than significant impact to tribal cultural resources as a result of this project is anticipated.

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

Responses:

a) **Less than significant impact.** This project will not require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. The project would not require water or sanitary sewer services during project operation, and no connections to facilities are proposed. The project will also include a small amount of impervious surface for the ground equipment and the site would maintain on-site drainage without the need for connection to stormwater facilities. The project would require connection to existing electrical and cable infrastructure through on-site trenching through the existing orchard; however, no significant environmental impacts would occur as a result of these improvements. This project was reviewed by the Pacific Gas and Electric Company (PG&E) and they indicated that proposed improvements will not directly interfere with existing PG&E facilities or impact their easement rights. The project site has been previously disturbed and historically used for agriculture and has no significant environmentally sensitive characteristics present such as wetlands, special status species, cultural resources, or other potentially significant issues associated with the site. A less than significant impact would occur.

b) **No impact.** This project will have sufficient water supplies available to serve the project and reasonably foreseeable future development. The proposed project will not be connected to or utilize a water supply to operate the facility. As a result, no impact is anticipated.

c) **No impact.** This project will not result in a determination by a 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. This project will not be connected to any public or private sewage disposal infrastructure. Therefore, a demand will not be placed on a local sanitary sewer system and no impact is anticipated.

d-e) **Less than significant impact.** This project will have a less than significant impact on solid waste. Any solid waste from this project will be disposed of through the local waste disposal company in a sanitary landfill in Yuba County which has sufficient capacity to serve the project. The unmanned telecommunications facility will generate little to no waste and any waste generated by the facility will comply with all federal, state, and local statutes and regulations related to solid waste. As a result, a less than significant impact is anticipated.

(County of Sutter, General Plan Technical Background Report. 2008)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Responses:

a-d) **No impact.** The subject property is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, no impacts are anticipated with respect to wildfire hazard.

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

Responses:

a) **Less than significant impact.** No environmental effects were identified in the initial study which indicate the project will have the ability to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to

drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Mitigation Measures 2 and 3, proposed in the Cultural Resources section, would protect possible disturbance of archaeological resources and human remains, respectively, should they be encountered.

b) **Less than significant impact.** No environmental effects were identified in the initial study which indicates the project would have impacts that are individually limited, but cumulatively considerable. The project would generate temporary emissions associated with construction of the proposed improvements of the tower, ground equipment, and utility infrastructure such as grading and trenching. Standard mitigation measures for project construction emissions have been incorporated into to minimize construction related emissions, however, the project is not anticipated to contribute to cumulative significant impact with regard to air quality. In rural areas, noise impacts generally are localized in character and typically do not have cumulative effects. Mitigation Measure No. 5 would be applied to the proposed project, as described in Section XIII, Noise, to reduce noise impacts and long-term noise associated with the facility would be minimal and would only generate short-term noise during emergency operations of on-site diesel generators.

c) **Less than significant impact**. No environmental effects which will cause substantial adverse effects on human beings either directly or indirectly were identified in the initial study. The radio frequency analysis conducted for the proposed telecommunications facility determined no impacts to the general public would occur and standard protocols for employee safety will be employed to ensure employees maintain a safe working environment when performing work in and around the proposed facility.

MITIGATION MONITORING PROGRAM – Project #U22-0033 (TeleSpan Communications, LLC)

Mitigation Measure	Timing	Monitoring Agency
Mitigation Measure No. 1 (Air Quality): The project applicant shall implement the following FRAQMD-recommended Standard Mitigation Measures for projects that do not exceed construction or operational thresholds of significance. • Implement the Fugitive Dust Control Plan prior to any on-site grading, landscaping, or construction activities. The applicant shall submit the fugitive dust control plan to the FRAQMD for review and approval. A copy of the approved plan shall be submitted to the Development Services Department. • Construction equipment exhaust emissions shall not exceed FRAQMD Regulation III, Rule 3.0, Visible Emissions limitations (40 percent opacity or Ringlemann 2.0). • The contractor shall be responsible to ensure that all construction equipment is properly tuned and maintained prior to and for the duration of onsite operation.	Prior to any on-site grading or construction activities/ Ongoing	FRAQMD / Development Services

Mitigation Measure	Timing	Monitoring Agency
• Limit idling time to 5 minutes – saves fuel and reduces emissions in accordance with 13 California Code of Regulations (CCR) Chapter 10 Section 2485 and 13 CCR Chapter 9 Article 4.8 Section 2449. • Utilize existing power sources or clean fuel generators rather than temporary power generators. • Develop traffic plans to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • Portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, may require CARB Portable Equipment Registration with the State or a local district permit. The owner/operator shall be responsible for arranging appropriate consultation with CARB or FRAQMD to determine registration and permitting requirements prior to equipment operation at the site.		
Mitigation Measure No. 2 (Cultural Resources): If archaeological resources are discovered on the project site, potential ground disturbing activities within 100 feet of the find shall be halted immediately and the Development Services Department shall be notified. A qualified archaeologist shall examine the find and evaluate its significance. The archaeologist shall recommend measures needed to reduce effects on the cultural resource in a written report to the County. The County shall be responsible for implementing the report recommendations.	During construction activities	Construction personnel
Mitigation Measure No. 3 (Cultural Resources): If human remains are discovered on the site potentially ground disturbing activities within 100 feet of the remains shall be halted immediately, and the project applicant shall notify the Sutter County Coroner and Native American Heritage Commission (NAHC) immediately, according to Public Resources Code §5097.98 and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the NAHC to be Native American, the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project applicant shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any,	During construction activities	Construction personnel

Mitigation Measure	Timing	Monitoring Agency
identified by the NAHC. Following the coroner's and NAHC's findings, the archaeologist, and the NAHC-designated Most Likely Descendant shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code Section 5097.94.		
Mitigation Measure No. 4 (Geology and Soils): STORM WATER QUALITY PROTECTION – DURING CONSTRUCTION. SWPPP - Prior to the start of construction, the applicant shall prepare and submit a Storm Water Pollution and Prevention Plan (SWPPP) if the project's cumulative disturbed area is one acre or more, to be executed through all phases of grading and project construction. The SWPPP shall incorporate Best Management Practices (BMPs) to ensure that potential water quality impacts during construction phases are minimized. These measures shall be consistent with the County's Improvement Standards and Land Grading and Erosion Control Ordinance and the requirements of the National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities. The SWPPP shall be submitted to the County for review and to the Central Valley Regional Water Quality Control Board as required by the NPDES General Permit in effect during construction. During construction, the applicant shall implement actions and procedures established to reduce the pollutant loadings in storm drain systems. The project applicant shall implement BMPs in accordance with the SWPPP and the County's Improvement Standards. The project applicant(s) shall submit a state storm water permit Waste Discharger Identification (WDID) number for each construction project. If the project cumulative disturbed area is less than one acre, the applicant's engineer shall submit an engineer stamped letter along with a calculation certifying the cumulative disturbed area is less than one acre. NPDES GENERAL CONSTRUCTION PERMIT - If the project size is one acre or more, the applicant shall file a Notice of Intent (NOI) with the Central Valley Regional Water Quality Control Board (CVRWQCB), prior to construction, to obtain coverage under the California State Water Resources - General Construction Activity Storm Water Permit. Permits are issued by the State Water Resources Control Board, which can provide all information necessary to complete and file the necessary documents. Applicant shall comply with the terms of the General	Prior to the start of construction and during construction	RWQCB/ Development Services Engineering Division

Mitigation Measure	Timing	Monitoring Agency
Construction Permit, the County's ordinances, and the NPDES Waste Discharge Requirements for the Sutter County Phase II NPDES Permit.		
Mitigation Measure No. 5 (Noise): During construction, the applicant shall ensure that all project related noise-generating construction activities are limited to daytime hours between 7:00 a.m. and 6:00 p.m. on weekdays, 8:00 a.m. and 5:00 p.m. on Saturdays, and are prohibited on Sundays and holidays unless permission for the latter has been applied for and granted by the County.	During construction	Development Services

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Radiofrequency Compliance Report. Site Safe. January 13, 2023

Attachments:

1. Development Plans
2. Photo Simulations
3. Radio Frequency Site Compliance Report Prepared by SiteSafe, June 30, 2023

ADMINISTRATIVE REQUIREMENTS

1. ALL WORK SHALL CONFORM TO 2022 TITLE 24, CALIFORNIA CODE OF REGULATIONS (CCR). A COPY OF PARTS 1 TO 5, AND PART 9, TITLE 24, C.C.R. SHALL BE KEPT ON THE JOB SITE AT ALL TIMES.
2. ALL ADDENDA TO BE SIGNED BY ARCHITECT OR EOR AND THE OWNER AND APPROVED BY DSA. ADDENDA ARE NOT VALID UNTIL APPROVED BY DSA PER SECTION 4-338, PART 1, TITLE 24.
3. CHANGES OR SUBSTITUTIONS OF ANY ELEMENT WHICH AFFECTS THE STRUCTURAL, ACCESSIBILITY OR FIRE AND LIFE SAFETY PORTIONS OF THE APPROVED PLANS AND SPECIFICATIONS AFTER THE WORK HAS BEEN LET SHALL BE SUBMITTED AND APPROVED BY DSA PRIOR TO COMMENCEMENT OF THE WORK. CONSTRUCTION CHANGE DOCUMENTS SHALL BE PREPARED AND SUBMITTED TO DSA IN COMPLIANCE WITH DSA INTERPRETATION OF REGULATION IR A-6 AND SECTION 4-338(C) PART 1, TITLE 24 CCR.
4. STRUCTURAL TESTS AND SPECIAL INSPECTIONS SHALL BE IN ACCORDANCE WITH SECTION 4-335, PART 1, TITLE 24. THE TESTING LABORATORY SHALL BE APPROVED BY DSA AND EMPLOYED BY THE DISTRICT/OWNER.
5. DSA SHALL BE NOTIFIED AT THE START OF CONSTRUCTION AND PRIOR TO THE PLACEMENT OF CONCRETE PER SECTION 4-331, PART 1, TITLE 24.
6. INSPECTOR SHALL BE APPROVED BY DSA AND EMPLOYED BY DISTRICT. INSPECTION SHALL BE IN ACCORDANCE WITH SECTION 4-333(b). THE DUTY OF THE INSPECTOR SHALL BE IN ACCORDANCE WITH SECTION 4-342(b), PART 1, TITLE 24.
7. SUPERVISION OF CONSTRUCTION BY DSA SHALL BE IN ACCORDANCE WITH SECTION 4-334, PART 1, TITLE 24.
8. CONTRACTOR, INSPECTOR, ARCHITECT, AND ENGINEERS SHALL SUBMIT VERIFIED REPORTS (FORM DSA-6) IN ACCORDANCE WITH SECTIONS 4-336 AND 4-343, PART 1, TITLE 24.
9. THE STRUCTURAL ENGINEER SHALL PERFORM THEIR DUTIES IN ACCORDANCE WITH SECTIONS 4-333(a) AND 4-341, PART 1, TITLE 24.
10. THE CONTRACTOR SHALL PERFORM HIS DUTIES IN ACCORDANCE WITH SECTIONS 4-343, PART 1, TITLE 24.
11. THE INTENT OF THESE DRAWINGS AND SPECIFICATIONS IS THAT THE WORK OF ALTERATION, REHABILITATION OR RECONSTRUCTION IS TO BE IN ACCORDANCE WITH TITLE 24, CALIFORNIA CODE OF REGULATIONS (CCR). SHOULD ANY EXISTING CONDITIONS SUCH AS DETERIORATION OR NONCOMPLYING CONSTRUCTION BE DISCOVERED WHICH IS NOT COVERED BY THE CONTRACT DOCUMENTS WHERE IN THE FINISHED WORK WILL NOT COMPLY WITH TITLE 24, CALIFORNIA CODE OF REGULATIONS. A CONSTRUCTION CHANGE DOCUMENT, OR SEPARATE SET OF PLANS AND SPECIFICATIONS, DETAILING AND SPECIFYING THE REQUIRED WORK SHALL BE SUBMITTED TO AND APPROVED BY DSA BEFORE PROCEEDING WITH THE WORK.
12. GRADING PLANS, DRAINAGE IMPROVEMENTS, ROAD AND ACCESS REQUIREMENTS AND ENVIRONMENTAL HEALTH CONSIDERATIONS SHALL COMPLY WITH ALL LOCAL ORDINANCES

TeleSpan COMMUNICATIONS

SUTTER WIRELESS COLLOCATION

2665 ACACIA AVE.
SUTTER, CA 95982

STATEMENT OF GENERAL CONFORMANCE

Application No: 02-XXXXXX File No: XX-XX

[X] Sheet C-1, E-1.0, E-1.1, E-1.2, E-1.3, E-2.1 listed in the sheet index on this page.

[ ] This drawing, page of specifications or calculations have/has been prepared by other design professionals or consultants who are licensed and/or authorized to prepare such drawings in this state. It has been examined by me for:
1. design intent and appears to meet the appropriate requirements of Title 24, California Code of Regulations and the project specifications prepared by me, and
2. coordination with my plans and specifications and is acceptable for incorporation into the construction of this project.

The Statement of General Conformance "shall not be construed as relieving me of my rights, duties, and responsibilities under Sections 17302 and 81138 of the Education Code and Sections 4-336, 4-341 and 4-344" of Title 24, Part1. (Title 24, Part 1, Section 4-317 (b))

I certify that all items referenced above are in general conformance and have been coordinated.

Signature	Date	Signature	Date
	-	N/A	
Architect or Engineer designated to be in general responsible charge.		Architect or Engineer delegated responsibility for this portion of work.	
KEVIN SORENSEN	S4469 (EXP 9/30/2024)		
Name	License Number	Name	License Number

PROJECT DESCRIPTION

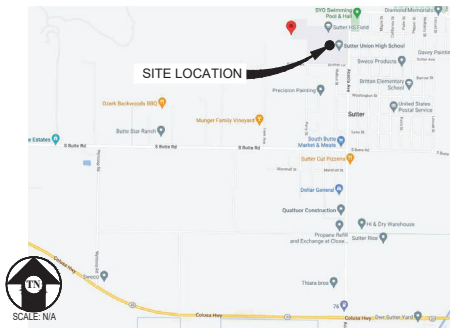
A (P) TELESPAN UNMANNED TELECOMMUNICATION FACILITY CONSISTING OF INSTALLING:

- (P) 70' X 70' (4,900 S.F.) TELESPAN LEASE AREA
- (P) 125' TALL MONOPINE
- (P) 50' X 50' FENCED SITE WITH ACCESS GATE
- (P) APPROX. 565' OF NEW U/G POWER
- (P) APPROX. 570' OF NEW U/G TELCO
- (P) UTILITY TERMINATION EQUIPMENT INCLUDING PULL BOXES, TRANSFORMER, BOLLARDS, H-FRAME, DISCONNECT SWITCH, GUTTER, AND 3 METER SOCKETS
- (P) APPROX. 100' OF ICE BRIDGE
- (F) (12) 8' PANEL ANTENNAS ON TOWER FOR EACH OF (3) COLLOCATED CARRIERS
- (F) (24) REMOTE RADIO UNITS ON TOWER FOR EACH OF (3) COLLOCATED CARRIERS
- (F) (6) SURGE SUPPRESSORS ON TOWER FOR EACH OF (3) COLLOCATED CARRIERS
- (F) 10' X 15' CONCRETE SLAB FOR GROUND BASED RADIO EQUIPMENT FOR EACH OF (3) COLLOCATED CARRIERS
- (F) GROUND BASED RADIO EQUIPMENT FOR EACH OF (3) COLLOCATED CARRIERS
- (F) STANDBY EMERGENCY GENERATOR FOR EACH OF (3) COLLOCATED CARRIERS

PROJECT INFORMATION

SITE NAME:	SUTTER WIRELESS COLLOCATION	SITE #:	SUTTER HIGH SCHOOL
COUNTY:	SUTTER COUNTY	JURISDICTION:	SUTTER COUNTY & DSA
APN:	13-200-062	POWER:	PG&E
SITE ADDRESS:	2665 ACACIA AVE. SUTTER, CA 95982	TELEPHONE:	AT&T
CURRENT ZONING:	-		
CONSTRUCTION TYPE:	I-B		
OCCUPANCY TYPE:	U, (UNMANNED COMMUNICATIONS FACILITY)		
PROPERTY OWNER:	SUTTER UNION HIGH SCHOOL DISTRICT PO BOX 498 SUTTER, CA 95982		
APPLICANT:	TELESPAN COMMUNICATIONS LLC 3888 STATE ST, STE# 204 SANTA BARBARA, CA 93105		
LEASING CONTACT:	ATTN: TIM COTTER (805) 451-6283 TCOTTER@TSPAN.NET		
ZONING CONTACT:	ATTN: NICK TAGAS (805) 990-1446 NICK.TAGAS@51WIRELESS.NET		
CONSTRUCTION CONTACT:	ATTN: TIM COTTER (805) 451-6283 TCOTTER@TSPAN.NET		
LATITUDE: LONGITUDE:	N 39° 10' 03.89" NAD 83 W 121° 45' 19.45" NAD 83		
AMSL:	±89'		

VICINITY MAP



DRIVING DIRECTIONS

FROM: 3888 STATE ST, STE# 204, SANTA BARBARA, CA 93105
TO: 2665 ACACIA AVE., SUTTER, CA 95982

1.	HEAD WEST ON STATE ST TOWARD N LA CUMBRE RD	0.3 MI
2.	USE THE RIGHT 2 LANES TO TAKE THE RAMP ONTO US-101 N	0.2 MI
3.	MERGE ONTO US-101 N	235 MI
4.	CONTINUE ONTO US-101 N	47.3 MI
5.	USE THE RIGHT 2 LANES TO TAKE EXIT 384 FOR ROUTE 280/ROUTE 680 TOWARD DOWNTOWN/SAN JOSE/SACRAMENTO	0.6 MI
6.	KEEP RIGHT AT THE FORK, FOLLOW SIGNS FOR I-680/SACRAMENTO AND MERGE ONTO I-680 N	56.1 MI
7.	KEEP LEFT AT THE FORK TO CONTINUE ON I-680	14.4 MI
8.	USE ANY LANE TO TAKE EXIT 71A TOWARD I-80 E/SACRAMENTO	0.4 MI
9.	MERGE ONTO I-80 E	29.0 MI
10.	USE THE RIGHT 2 LANES TO TAKE EXIT 70 FOR CA-113 N TOWARD WOODLAND	1.4 MI
11.	CONTINUE ONTO CA-113 N	11.1 MI
12.	MERGE ONTO CA-113 N/I-5 N	0.3 MI
13.	USE ANY LANE TO TURN RIGHT ONTO CA-113 N/N EAST ST	0.8 MI
14.	TURN RIGHT ONTO CO RD 18C	2.0 MI
15.	TURN LEFT ONTO CO RD 102	5.8 MI
16.	CONTINUE ONTO CA-113 N	15.2 MI
17.	TURN LEFT ONTO S GEORGE WASHINGTON BLVD	9.6 MI
18.	TURN LEFT ONTO STATE HWY 20 W	1.0 MI
19.	TURN RIGHT AT THE 3RD CROSS STREET ONTO N TOWNSHIP RD	1.3 MI
20.	TURN LEFT ONTO BUTTE HOUSE RD	3.6 MI
21.	TURN RIGHT ONTO ACACIA AVE	0.1 MI
22.	TURN LEFT AT THE 1ST CROSS STREET ONTO BUTTE AVE	0.3 MI

END AT: 2665 ACACIA AVE., SUTTER, CA 95982

ESTIMATED TIME: 7 HOUR 9 MINUTES ESTIMATED DISTANCE: 436 MILES

CODE COMPLIANCE

ALL WORK & MATERIALS SHALL BE PERFORMED & INSTALLED IN ACCORDANCE WITH THE CURRENT EDITIONS OF THE FOLLOWING CODES AS ADOPTED BY THE LOCAL GOVERNING AUTHORITIES. NOTHING IN THESE PLANS IS TO BE CONSTRUED TO PERMIT WORK NOT CONFORMING TO THESE CODES:

2022 CALIFORNIA ADMINISTRATIVE CODE, PART 1, TITLE 24 C.C.R.
2022 CALIFORNIA BUILDING CODE (CBC), PART 2, VOLUME 1&2, TITLE 24 C.C.R.
(2021 INTERNATIONAL BUILDING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ELECTRICAL CODE (CEC), PART 3, TITLE 24 C.C.R.
(2020 NATIONAL ELECTRICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA MECHANICAL CODE (CMC) PART 4, TITLE 24 C.C.R.
(2021 UNIFORM MECHANICAL CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA PLUMBING CODE (CPC), PART 5, TITLE 24 C.C.R.
(2021 UNIFORM PLUMBING CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA ENERGY CODE (CEC), PART 6, TITLE 24 C.C.R.
2022 CALIFORNIA FIRE CODE, PART 9, TITLE 24 C.C.R.
(2021 INTERNATIONAL FIRE CODE AND 2022 CALIFORNIA AMENDMENTS)
2022 CALIFORNIA GREEN BUILDING STANDARDS CODE, PART 11, TITLE 24 C.C.R.
2022 CALIFORNIA REFERENCED STANDARDS, PART 12, TITLE 24 C.C.R.
ANSI/EIA-TIA-222-H

ALONG WITH ANY OTHER APPLICABLE LOCAL & STATE LAWS AND REGULATIONS

DISABLED ACCESS REQUIREMENTS

THIS FACILITY IS UNMANNED & NOT FOR HUMAN HABITATION. DISABLED ACCESS & REQUIREMENTS ARE NOT REQUIRED IN ACCORDANCE WITH CALIFORNIA STATE BUILDING CODE, TITLE 24 PART 2, SECTION 11B-203.5

SHEET INDEX (9 TOTAL SHEETS)

SHEET	DESCRIPTION	REV
T-1	TITLE SHEET	-
C-1	TOPOGRAPHIC SURVEY	-
A-1.1	OVERALL SITE PLAN	-
A-1.2	ENLARGED SITE PLAN	-
A-1.3	ENLARGED EQUIPMENT PLAN	-
A-2.1	EQUIPMENT PLAN	-
A-3.1	ELEVATIONS	-
A-3.2	ELEVATIONS	-
E-1.1	ELECTRICAL PLAN	-

DSA APPROVAL

Issued For:
SUTTER
2665 ACACIA AVE.
SUTTER, CA 95982

PREPARED FOR

Vendor:
TeleSpan COMMUNICATIONS
3888 STATE ST, STE# 204
SANTA BARBARA, CA 93105

SITE NO:	N/A
PROJECT NO:	N/A
DRAWN BY:	C. COLSTON
CHECKED BY:	S. SAVIG
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
	07/15/22	CLIENT REV	C.T.C
	07/18/22	ZD 100%	S.V.
	08/09/22	CLIENT REV	C.T.C
	09/09/22	CLIENT REV	S.V.
	01/12/23	CLIENT REV	C.T.C
	06/29/23	CLIENT REV	D.H.

Licensee:
PRELIMINARY: NOT FOR CONSTRUCTION
KEVIN R. SORENSEN
S4469

IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS THEY ARE ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT.

ENGINEER:
Streamline Engineering and Design, Inc.
8445 Sierra College Blvd. Suite E Granite Bay, CA 95746
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineerg.com Fax: 916-660-1941

SHEET TITLE:
TITLE SHEET

SHEET NUMBER:
T-1.1

Lease Area Description

All that certain lease area being a portion of that certain parcel of land described in Deed filed for record Book 1268, Page 489, Official Records of Sutter County, California, and being a portion of the NW 1/4 of Section 9, Township 15 North, Range 2 East M.D.B. & M. being more particularly described as follows:

Commencing at a Sutter County standard monument in box set at the centerline of cul-de-sac on Ranch Road as is shown on that certain Subdivision Map filed for record at Book 19 of Tracts at Page 229, Official Records, from which a similar monument at the centerline intersection of Ranch Road and Perry Avenue bears North 88°38'54" East 1086.65 feet; thence from said point of commencement North 51°09'49" East 2288.85 feet to the True Point of Beginning; thence from said point of beginning East 70.00 feet; thence North 70.00 feet; thence West 70.00 feet; thence South 70.00 feet to the point of beginning.

Together with a non-exclusive easement for access and utility purposes twenty feet in width the centerline of which is described as follows: Beginning at the midpoint on the South boundary of the above described lease area and running thence South 12.72 feet to a point hereafter defined as Point "A"; thence continuing South 176.92 feet; thence through a tangent curve to the left having a central radius of 35.00 feet through an arc distance of 54.98 feet; thence tangent to the last curve East 494.4 feet more or less to the public right of way more commonly known as Acacia Avenue.

Also together with a non-exclusive easement for access & utility purposes twenty feet in width the centerline of which is described as follows: Beginning at Point "A" as previously described and running thence North 89°57'44" East 529.2 feet more or less to the public right of way more commonly known as Acacia Avenue.

Geil Engineering
Engineering * Surveying * Planning
1226 High Street
Auburn, California 95603-5015
Phone: (530) 885-0426 * Fax: (530) 823-1309

TeleSpan Communications, LLC

Project Name: Sutter – High School

Project Site Location: 2665 Acacia Avenue
Sutter, CA 95982
Sutter County

Date of Observation: 12-21-22

Equipment/Procedure Used to Obtain Coordinates: Trimble Geo XT post processed with Pathfinder Office software.

Type of Antenna Mount: Proposed Monopole Tower

Coordinates: (NAD83)
Latitude: N 39° 10' 03.89" N 39.167747°
Longitude: W 121° 45' 19.45" W 121.755403°

ELEVATION of Ground at Structure (NAVD88) 89.0' AMSL

CERTIFICATION: I, the undersigned, do hereby certify elevation listed above is based on a field survey done under my supervision and that the accuracy of those elevations meet or exceed 1-A Standards as defined in the FAA ASAC Information Sheet 91:003, and that they are true and accurate to the best of my knowledge and belief.

Kenneth D. Geil California RCE 14803

DATE OF SURVEY: 12-21-22

SURVEYED BY OR UNDER DIRECTION OF: KENNETH D. GEIL, R.C.E. 14803

LOCATED IN THE COUNTY OF SUTTER, STATE OF CALIFORNIA

BEARINGS SHOWN ARE BASED UPON MONUMENTS FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY.

ELEVATIONS SHOWN ON THIS PLAN ARE BASED UPON U.S.G.S. N.A.V.D. 88 DATUM. ABOVE MEAN SEA LEVEL.

N.G.V.D. 1929 CORRECTION: SUBTRACT 2.35' FROM ELEVATIONS SHOWN.

CONTOUR INTERVAL: N/A

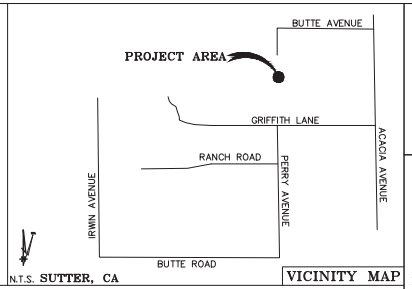
CONTRACTOR IS RESPONSIBLE TO VERIFY LEASE AREA PRIOR TO CONSTRUCTION.

ASSESSOR'S PARCEL NUMBER: 13-200-062

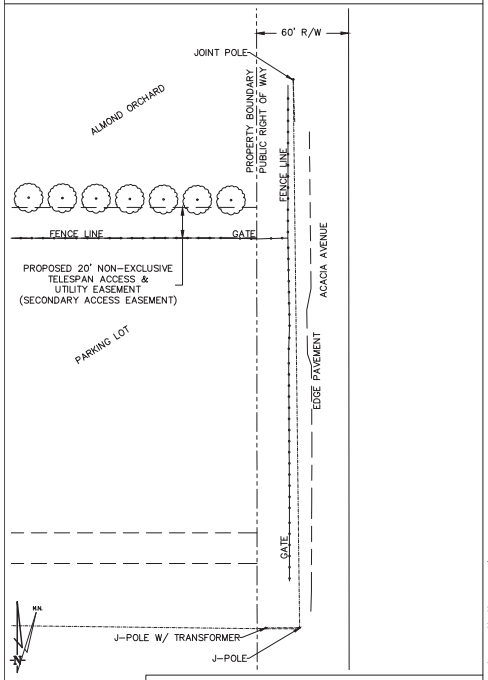
OWNER(S): SUTTER UNION HIGH SCHOOL DISTRICT
PO BOX 498
SUTTER, CA 95982

THESE DRAWINGS AND/OR THE ACCOMPANYING SPECIFICATION AS INSTRUMENTS OF SERVICE, ARE THE EXCLUSIVE PROPERTY OF GEIL ENGINEERING AND THEIR USE AND PUBLICATION SHALL BE RESTRICTED TO THE ORIGINAL SITE AND CARRIER FOR WHICH THEY ARE PREPARED. REUSE, REPRODUCTION OR PUBLICATION BY ANY METHOD, IN WHOLE OR IN PART, IS PROHIBITED EXCEPT BY WRITTEN PERMISSION FROM GEIL ENGINEERING TITLE TO THESE PLANS AND/OR SPECIFICATIONS SHALL REMAIN WITH GEIL ENGINEERING WITHOUT PREJUDICE AND VISUAL CONTACT WITH THEM SHALL CONSTITUTE PRIMA FACIE EVIDENCE OF ACCEPTANCE OF THESE RESTRICTIONS.

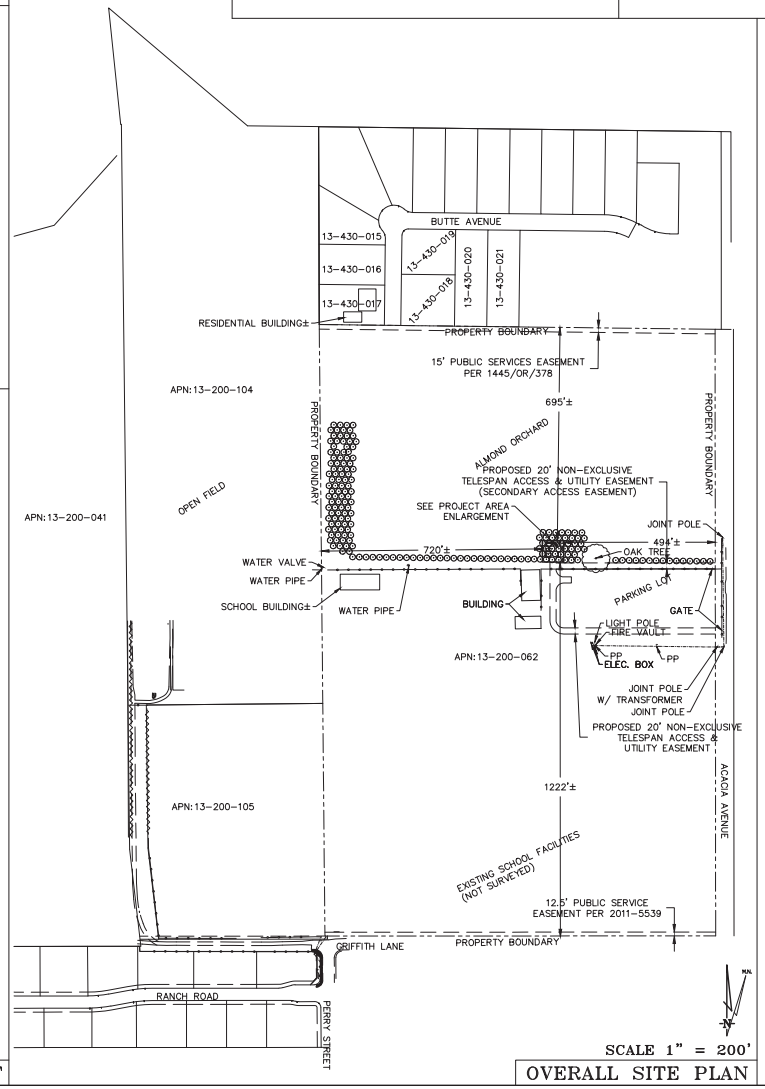
BOUNDARY SHOWN IS BASED ON MONUMENTATION FOUND AND RECORD INFORMATION. THIS IS NOT A BOUNDARY SURVEY. THIS IS A SPECIALIZED TOPOGRAPHIC MAP WITH PROPERTY LINES AND EASEMENTS BEING A GRAPHIC DEPICTION BASED ON INFORMATION GATHERED FROM VARIOUS SOURCES OF RECORD AND AVAILABLE MONUMENTATION FOUND DURING THE FIELD SURVEY. NO EASEMENTS WERE RESEARCHED OR PLOTTED. PROPERTY LINES AND LINES OF TITLE WERE NOT INVESTIGATED NOR SURVEYED. NO PROPERTY MONUMENTS WERE SET.



VICINITY MAP

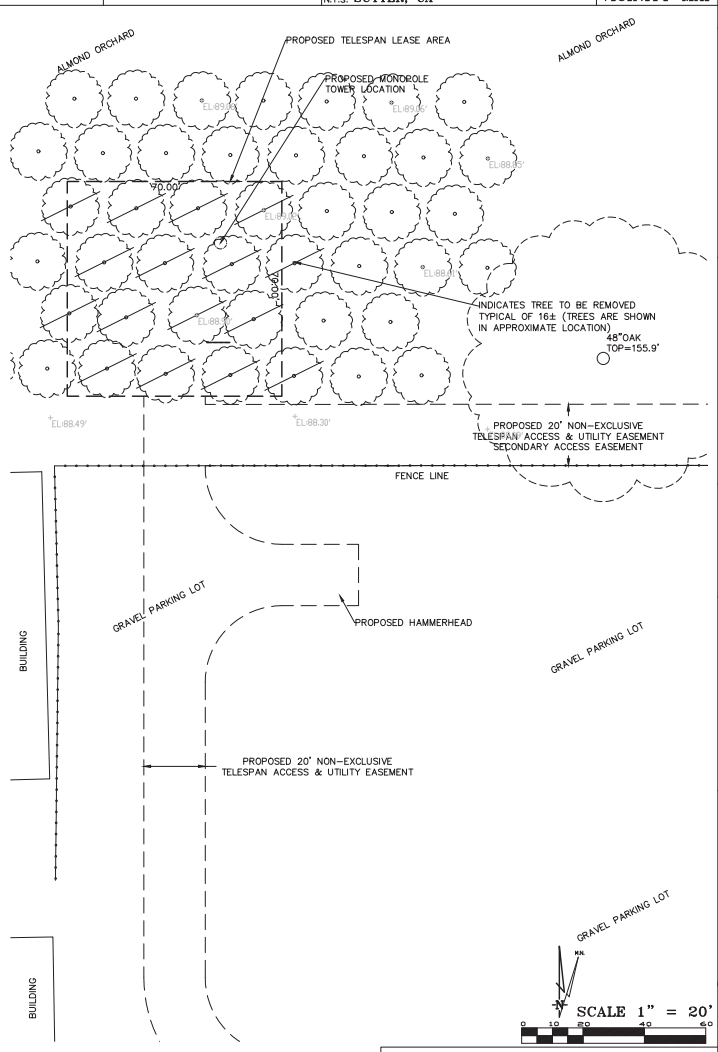


SCALE 1" = 40' UTILITY AREA ENLARGEMENT



SCALE 1" = 200'

OVERALL SITE PLAN



PROJECT AREA ENLARGEMENT

DEPT	APPROVED	DATE
A&C		
RE		
RF		
INT		
EE/IN		
OPS		
EE\OUT		

Surveyor

GEIL ENGINEERING
ENGINEERING * SURVEYING * PLANNING
1229 HIGH STREET
AUBURN, CALIFORNIA 95603
Phone: (530) 885-0426
Fax: (530) 823-1309

TeleSpan

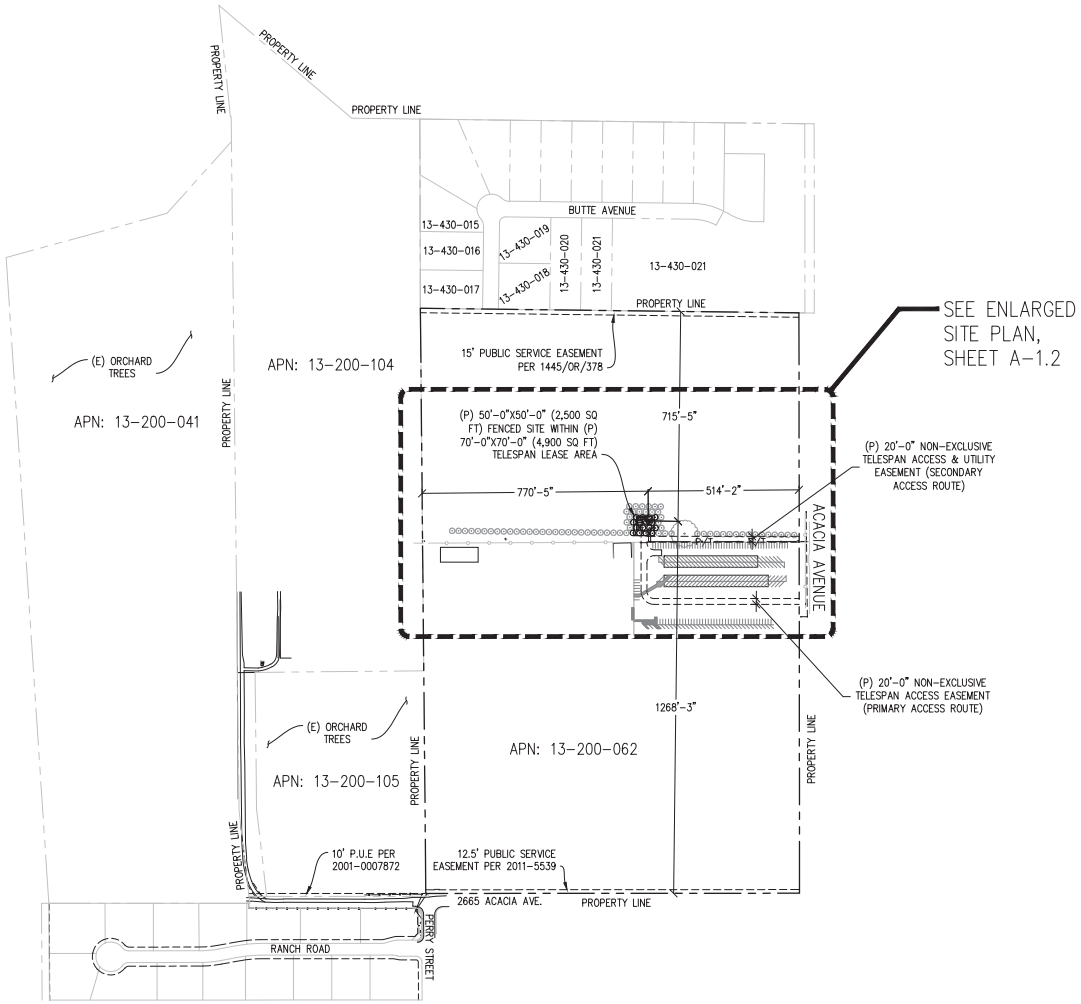
SUTTER

2665 ACACIA AVENUE
SUTTER, CA 95982
PLOT PLAN AND
SITE TOPOGRAPHY

REVISIONS			
REV	12-28-22	N. ROHDE	DRAWING SUBMITTAL
REV	01-04-23	N. ROHDE	EASEMENT MOD.
REV	01-10-23	N. ROHDE	EASEMENT MOD.
REV	06-19-23	N. ROHDE	NEW AREA ADDED
REV	06-28-23	N. ROHDE	LEASE AREA MOD.

Sheet

C-1



OVERALL SITE PLAN

1"=200'-0"

0 100' 200' 400' 600' 1,000'

DSA APPROVAL

Issued For:

SUTTER

2665 ACACIA AVE.
SUTTER, CA 95982

PREPARED FOR

Vendor:

TeleSpan COMMUNICATIONS

3888 STATE ST, STE# 204
SANTA BARBARA, CA 93105

SITE NO:	N/A
PROJECT NO:	N/A
DRAWN BY:	C. COLSTON
CHECKED BY:	S. SAVIG
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
	07/15/22	CLIENT REV	C.T.C
	07/18/22	ZD 100%	S.V.
	08/09/22	CLIENT REV	C.T.C
	09/09/22	CLIENT REV	S.V.
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	06/29/23	CLIENT REV	D.H.

Licensee:

PRELIMINARY: NOT FOR CONSTRUCTION

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ENGINEER:

Streamline Engineering and Design Inc.

8445 Sierra College Blvd, Suite E Granite Bay, CA 95746
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

THESE PLANS AND SPECIFICATIONS ARE INSTRUMENTS OF SERVICE, ARE AND SHALL REMAIN THE PROPERTY OF STREAMLINE ENGINEERING AND DESIGN INC. THEY ARE NOT TO BE USED FOR ANY PURPOSE OTHER THAN THE PROPOSED SUBJECT OF THIS SPECIFICATION. THEY ARE NOT TO BE USED FOR ANY PURPOSE OTHER THAN THE PROPOSED SUBJECT OF THIS SPECIFICATION. THEY ARE NOT TO BE USED FOR ANY PURPOSE OTHER THAN THE PROPOSED SUBJECT OF THIS SPECIFICATION. THEY ARE NOT TO BE USED FOR ANY PURPOSE OTHER THAN THE PROPOSED SUBJECT OF THIS SPECIFICATION. ALL RIGHTS RESERVED.

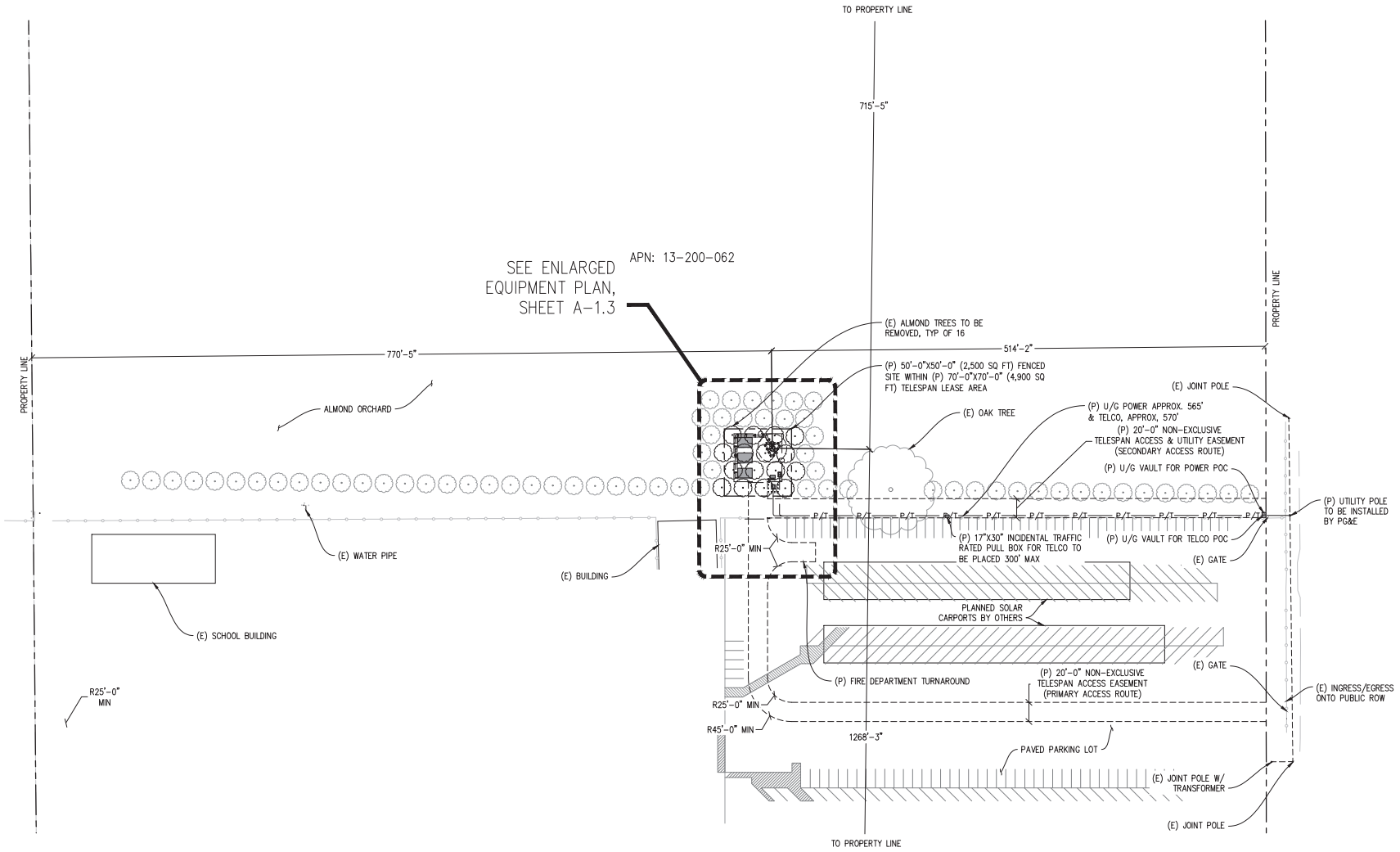
SHEET TITLE:

OVERALL SITE PLAN

SHEET NUMBER:

A-1.1

NOTE: SUBJECT TO UTILITY COMPANY ENGINEERING



ENLARGED SITE PLAN

1"=50'-0"

0 25' 50' 100' 150' 300'

DSA APPROVAL

Issued For:

SUTTER

2665 ACACIA AVE.
SUTTER, CA 95982

PREPARED FOR

Vendor:

TeleSpan COMMUNICATIONS

3888 STATE ST, STE# 204
SANTA BARBARA, CA 93105

SITE NO:	N/A
PROJECT NO:	N/A
DRAWN BY:	C. COLSTON
CHECKED BY:	S. SAVIG
APPROVED BY:	-

ISSUE STATUS

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	06/29/23	CLIENT REV	D.H.

Licensee:

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Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

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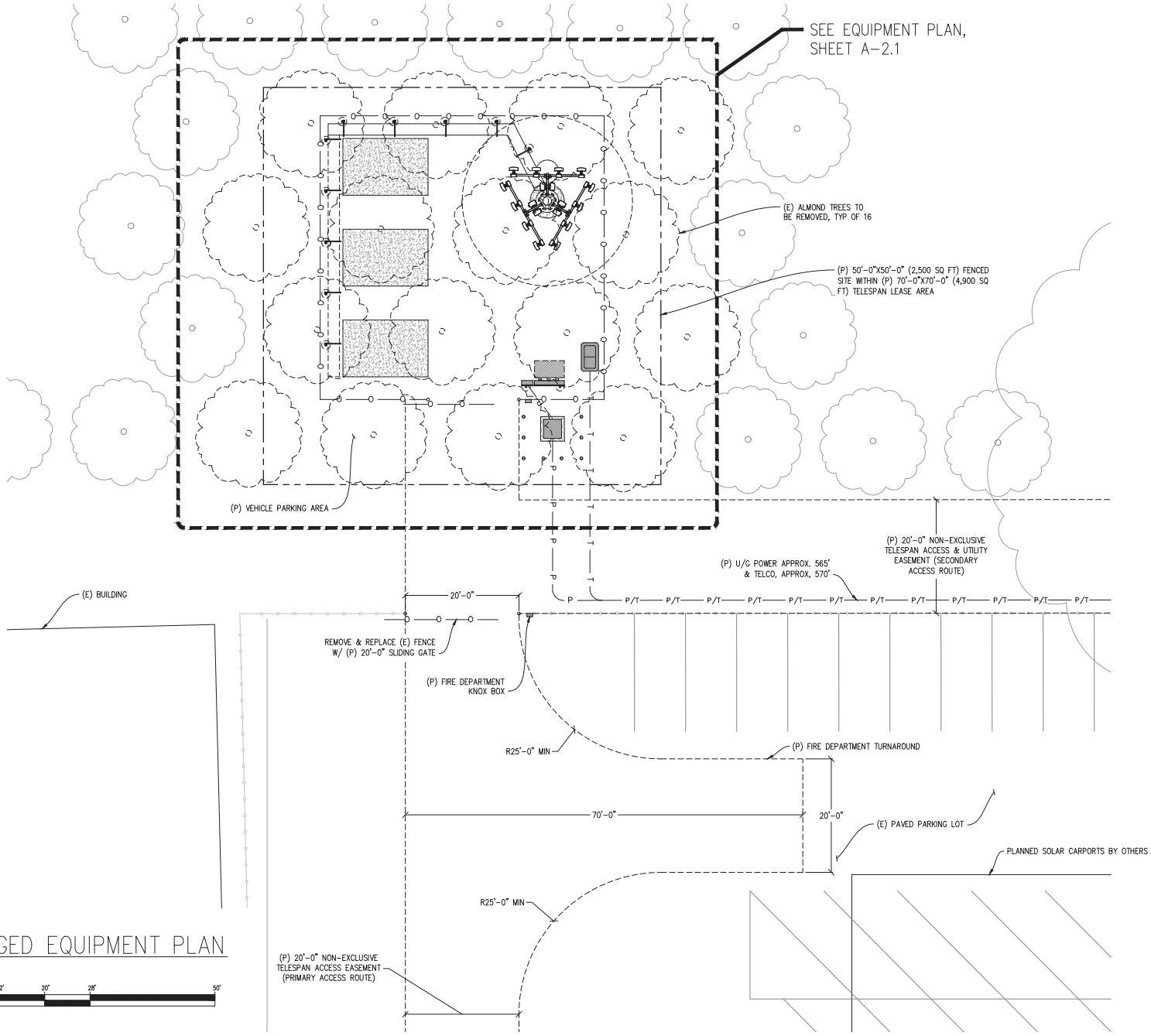
SHEET TITLE:

ENLARGED SITE PLAN

SHEET NUMBER:

A-1.2

NOTE: SUBJECT TO UTILITY COMPANY ENGINEERING



ENLARGED EQUIPMENT PLAN

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

DSA APPROVAL

Issued For:

SUTTER

2665 ACACIA AVE.
SUTTER, CA 95982

PREPARED FOR

Vendor:

TeleSpan COMMUNICATIONS

3888 STATE ST, STE# 204
SANTA BARBARA, CA 93105

SITE NO:	N/A
PROJECT NO:	N/A
DRAWN BY:	C. COLSTON
CHECKED BY:	S. SAVIG
APPROVED BY:	-

ISSUE STATUS

REV	DATE	DESCRIPTION	CAD
	07/15/22	CLIENT REV	C.T.C
	07/18/22	ZD 100%	S.V.
	08/09/22	CLIENT REV	C.T.C
	09/09/22	CLIENT REV	S.V.
	01/12/23	CLIENT REV	C.T.C
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S4469

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ENGINEER:

Streamline Engineering and Design Inc.

8445 Sierra College Blvd, Suite E Granite Bay, CA 95746
Contact: Kevin Sorensen Phone: 916-660-1930
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

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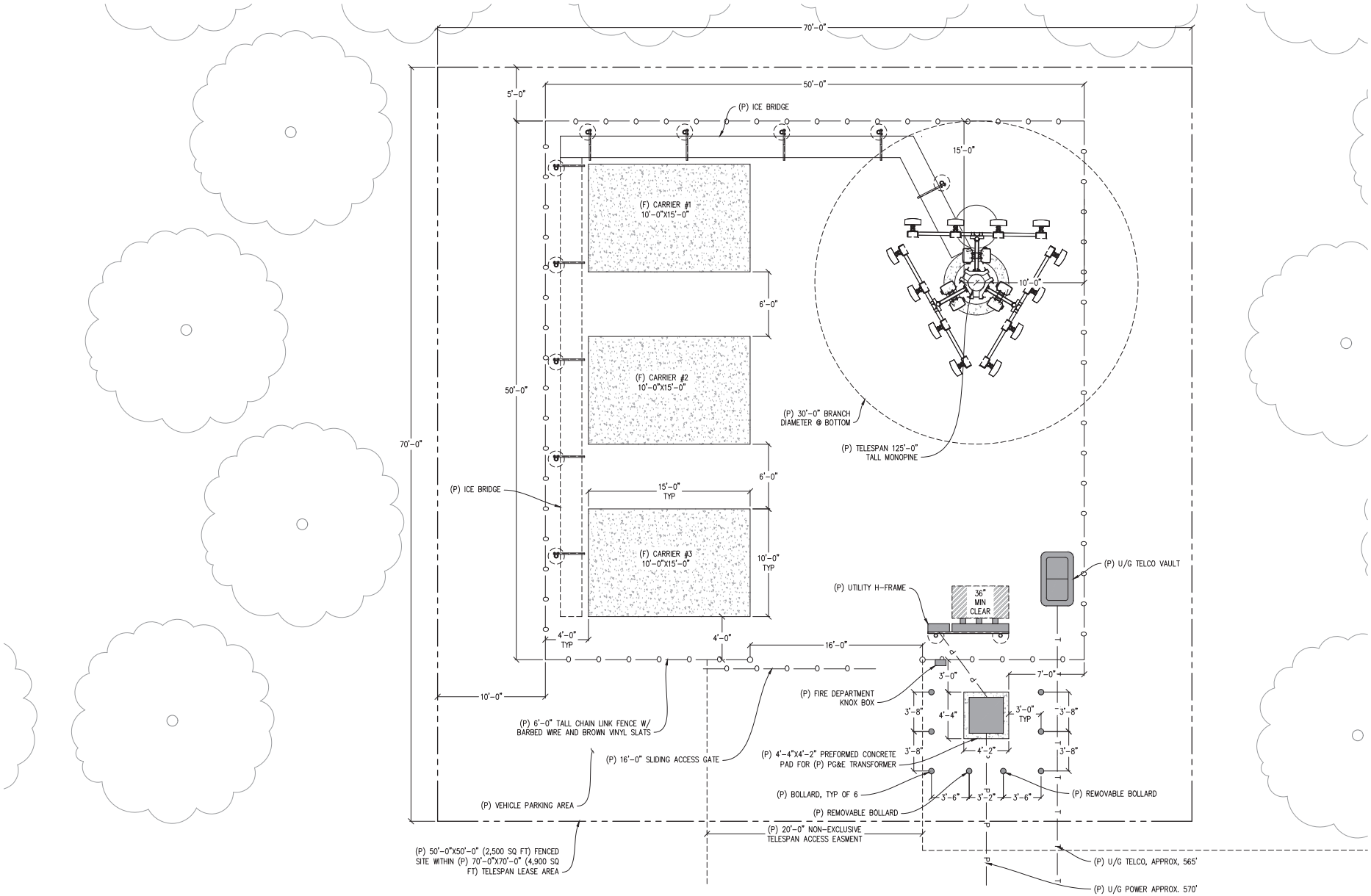
SHEET TITLE:

ENLARGED EQUIPMENT PLAN

SHEET NUMBER:

A-1.3



NOTE: SUBJECT TO UTILITY COMPANY ENGINEERING

EQUIPMENT PLAN

¼"=1'-0"

0 1' 2' 4' 6' 10' 14' 20'

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SUTTER, CA 95982

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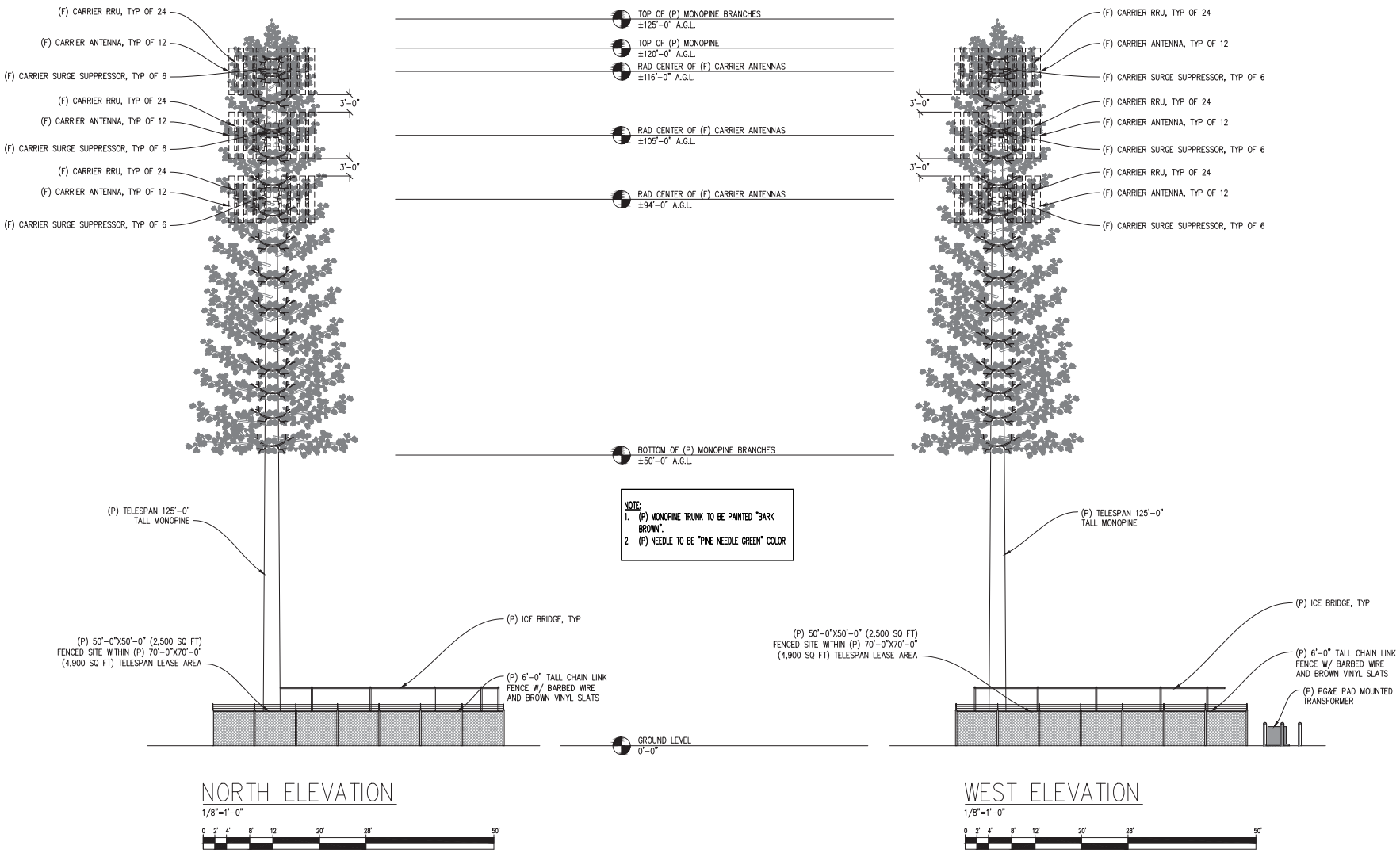
EQUIPMENT PLAN

SHEET NUMBER:

A-2.1



NOTE:
1. (P) MONOPINE TRUNK TO BE PAINTED "BARK BROWN".
2. (P) NEEDLE TO BE "PINE NEEDLE GREEN" COLOR

NORTH ELEVATION
1/8"=1'-0"

WEST ELEVATION
1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

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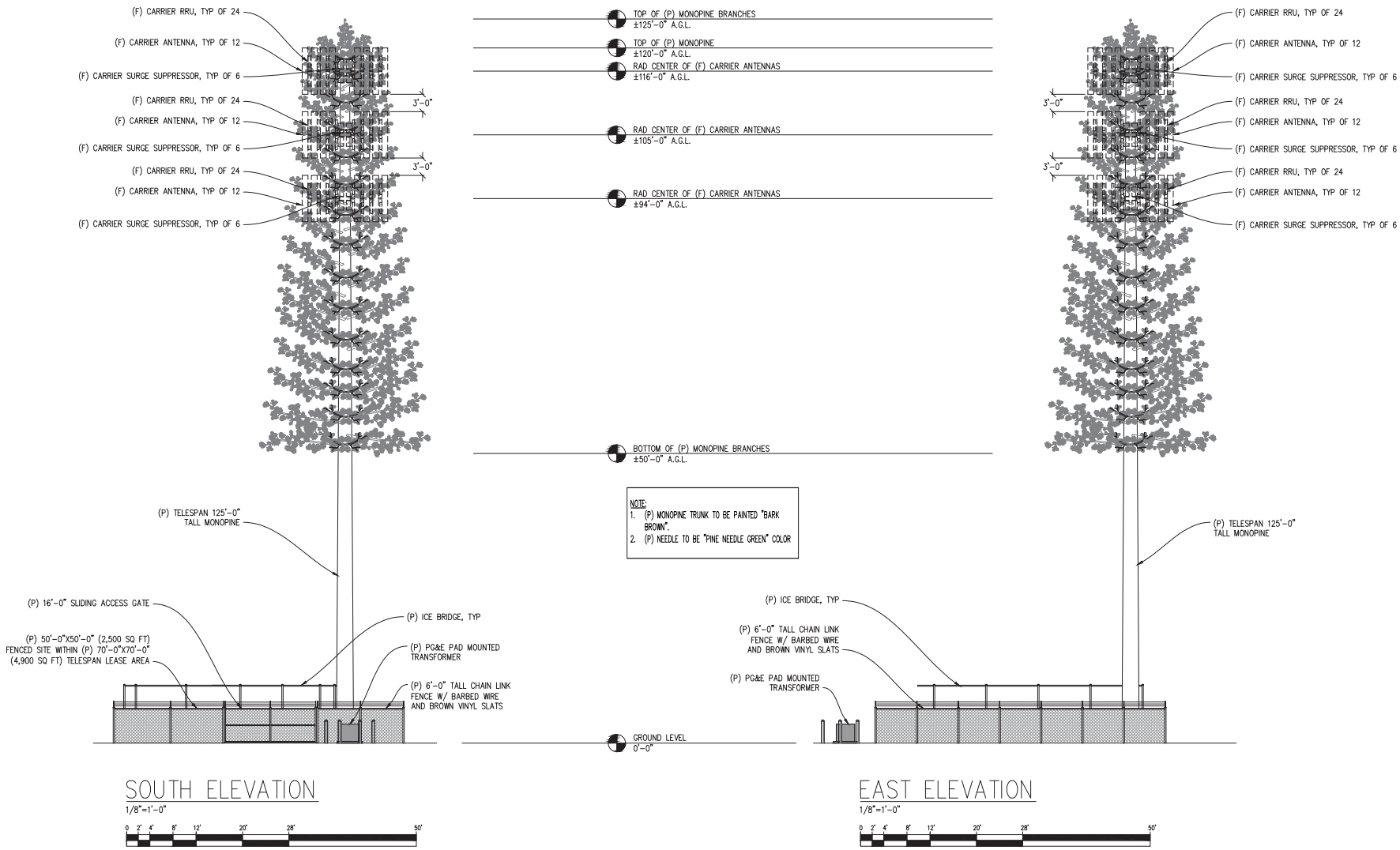
E-Mail: kevin@streamlineeng.com Fax: 916-660-1941

SHEET TITLE:

ELEVATIONS

SHEET NUMBER:

A-3.1



NOTE:
1. (P) MONOPINE TRUNK TO BE PAINTED "BARK BROWN".
2. (P) NEEDLE TO BE "PINE NEEDLE GREEN" COLOR

SOUTH ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

EAST ELEVATION

1/8"=1'-0"

0 2' 4' 8' 12' 20' 28' 50'

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SHEET TITLE:

ELEVATIONS

SHEET NUMBER:

A-3.2

ELECTRICAL LEGEND

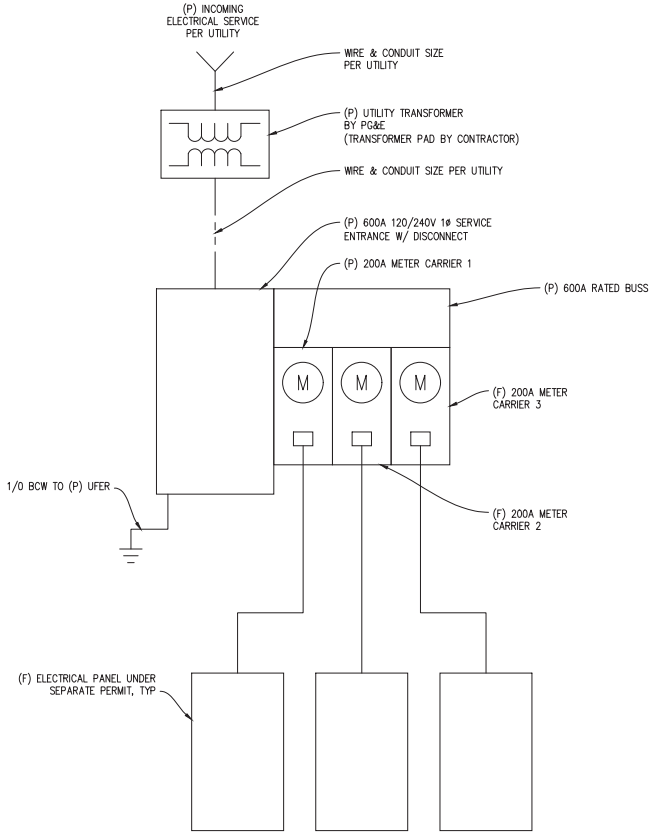
- (MI) MECHANICAL INTERLOCK
- (M) METER
- CIRCUIT BREAKER
- SERVICE GROUND
- WIRED CONNECTION

ELECTRICAL LABELING REQUIREMENTS

1. CONTRACTOR SHALL LABEL ALL ELECTRICAL DEVICES INSTALLED OR ALTERED PURSUANT TO THIS CONTRACT PER THE FOLLOWING. LABELS SHALL BE PERMANENT BLACK ON WHITE PEEL & STICK LABEL MAKER TYPE FOR ALL SWITCH & OUTLET PLATES, CONDUITS AND CEILING FIXTURES, AND SHALL BE PHENOLIC TAG TYPE FOR PANELS, XFMR's, PULL BOXES, ETC.; PHENOLIC TAGS SHALL BE RED IN COLOR WHERE BACKED UP BY GENERATOR
2. ALL PANELS, XFMR's AND PULL BOXES SHALL BE LABELED WITH DEVICE 'NAME', VOLTAGE(S), RATING FOR XFMR's, AND "FED FROM" DATA.
3. ALL SWITCH & OUTLET PLATES SHALL BE LABELED WITH "FED FROM" CIRCUIT DATA (PANEL NAME & CIRCUIT#); ALL GANG SWITCHES SHALL BEAR SWITCH NUMBERS BEGINNING W/#1 ON LEFT OF THE MAIN LIGHTING SWITCH FOR EACH ROOM FOR COORDINATION W/FIXTURE LABELS.
4. ALL (N) OR RETROFITTED LIGHTING FIXTURES SHALL BE LABELED WITH THE "FED FROM" DATA (SWITCH#)
5. ALL CONDUITS EXITING A PANEL BOARD SHALL BE LABELED "CIRCUIT(S) 'X'..." WHERE X IS/ARE THE BREAKER#(S). CONDUITS EXITING XFMR'S SHALL BE LABELED "FEEDER TO <PANEL, DEVICE>", E.G. "FEEDER TO PANEL <panel name>. CONDUITS ENTERING/EXITING A ROOM OR FLOOR SHALL BE LABELED AT THE ENTRY & EXIT (OR IN A SINGLE LOCATION IF OBVIOUS) W/"FED FROM..." & "TO PANEL/XFMR/..."DATA.
6. "FED FROM: DATA = <panel name> <brkr#> EG: "PANEL X/1,3,5")

ELECTRICAL NOTES

1. ALL ELECTRICAL WORK SHALL CONFORM TO THE 2019 CEC AS WELL AS ALL ADOPTED STANDARDS, APPLICABLE STATE AND LOCAL CODES.
2. CONTRACTOR SHALL FURNISH AND INSTALL ALL CONDUIT, CONDUCTORS, PULL BOXES, TRANSFORMER PADS, POLE RISERS, AND PERFORM ALL TRENCHING AND BACKFILLING REQUIRED IN THE PLANS.
3. ALL ELECTRICAL ITEMS SHALL BE U.L. APPROVED OR LISTED AND PROCURED PER PLAN SPECIFICATIONS.
4. ALL CIRCUIT BREAKERS, FUSES, AND ELECTRICAL EQUIPMENT SHALL HAVE AN INTERRUPTION RATING NOT LESS THAN THE MAXIMUM SHORT CIRCUIT CURRENT TO WHICH THEY MAY BE SUBJECTED WITH A MINIMUM OF 10,000 A.I.C. OR AS REQUIRED.
5. THE ENTIRE ELECTRICAL INSTALLATION SHALL BE GROUNDED AS REQUIRED BY ALL APPLICABLE CODES.
6. ELECTRICAL WIRING SHALL BE COPPER #12 AWG MIN WITH TYPE THHN, THWN-2 OR THW-2, INSULATION RATED FOR 90°C DRY OR 70°C WET.
7. ALL OUTDOOR EQUIPMENT SHALL HAVE NEMA 3R ENCLOSURE.
8. ALL BURIED WIRE SHALL RUN THROUGH SCHEDULE 40 PVC CONDUIT UNLESS OTHERWISE NOTED.
9. A GROUND WIRE IS TO BE PULLED IN ALL CONDUITS.
10. WHERE ELECTRICAL WIRING OCCURS OUTSIDE A STRUCTURE AND HAS THE POTENTIAL FOR EXPOSURE TO WEATHER, WIRING SHALL BE IN WATERTIGHT GALVANIZED RIGID STEEL OR FLEXIBLE CONDUIT.
11. WHERE PLANS CALL FOR A NEW ELECTRICAL SERVICE, PRIOR TO SUBMITTING BID, CONTRACTOR SHALL VERIFY PLAN DETAILS WITH THE UTILITY'S SERVICE PLAN & REQ'MTS INCLUDING SERVICE VOLTAGE, METER LOCATION, MAIN DISCONNECTING MEANS, AND AIC REQ'MT, AND SHALL OBTAIN CLARIFICATION FROM THE PROJECT ENGINEER ON ANY DEVIATIONS FOUND IN THESE PLANS.
12. WHERE THESE PLANS SHOW A DC POWER PLANT, THE INSTALLATION OPERATING AT LESS THAN 50 VDC UNGROUNDED, 2-WIRE, SHALL COMPLY WITH ARTICLE 720, AS FOLLOWS:
    A. POWER PLANT SHALL BE SUPPLIED BY THE WIRELESS CARRIER AS A PULL-TAG ITEM AND INSTALLED BY THE CONTRACTOR.
    B. CONDUCTORS SHALL NOT BE SMALLER THAN #12 AWG COPPER MIN, CONDUCTORS FOR BRANCH CIRCUITS SUPPLYING MORE THAN ONE APPLIANCE SHALL BE 10 AWG CU MIN; CONTRACTOR SHALL SIZE CONDUCTORS BASED ON MFGR'S DATA FOR THE APPLIANCES SERVED.
    C. THERE ARE NO DC RECEPTACLES OR LUMINARIES ALLOWED ON THIS PROJECT. ALL CIRCUITS SHALL ORIGINATE AT AN INTEGRATED DOUBLE LUG TAP OR SOCKET TERMINATION ON AN INTEGRATED DC CIRCUIT BREAKER AT AN INDIVIDUAL RECTIFIER MODULE AND TERMINATE AT THE SPECIALIZED LUG ON THE RESPECTIVE APPLIANCE AS A SINGLE RUN OF WIRE WITHOUT SPLICES. ALL DC WIRING SHALL BE LABELED AT THE DC PLANT WITH THE APPLIANCE SERVED AND THE DC VOLTAGE.
    D. ALL CABLING SHALL BE INSTALLED IN A NEAT AND WORKMAN LIKE MANNER AND SUPPORTED BY BUILDING STRUCTURE, EG. (N) CABLE TRAY OVERHEAD, IN SUCH A MANNER THAT THE CABLE WILL NOT BE DAMAGED BY NORMAL USE.



SINGLE LINE DIAGRAM

TYPICAL LOAD TABLE 240V	
CARRIER	LOAD KVA
(F) CARRIER 1	27 KVA
(F) CARRIER 2	27 KVA
(F) CARRIER 3	20 KVA
TOTAL	74 KVA

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SUTTER, CA 95982

PREPARED FOR

Vendor:

TeleSpan COMMUNICATIONS

3888 STATE ST, STE# 204
SANTA BARBARA, CA 93105

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SHEET TITLE:

SINGLE LINE DIAGRAM & PANEL SCHEDULE

SHEET NUMBER:

E-1.1

Sutter

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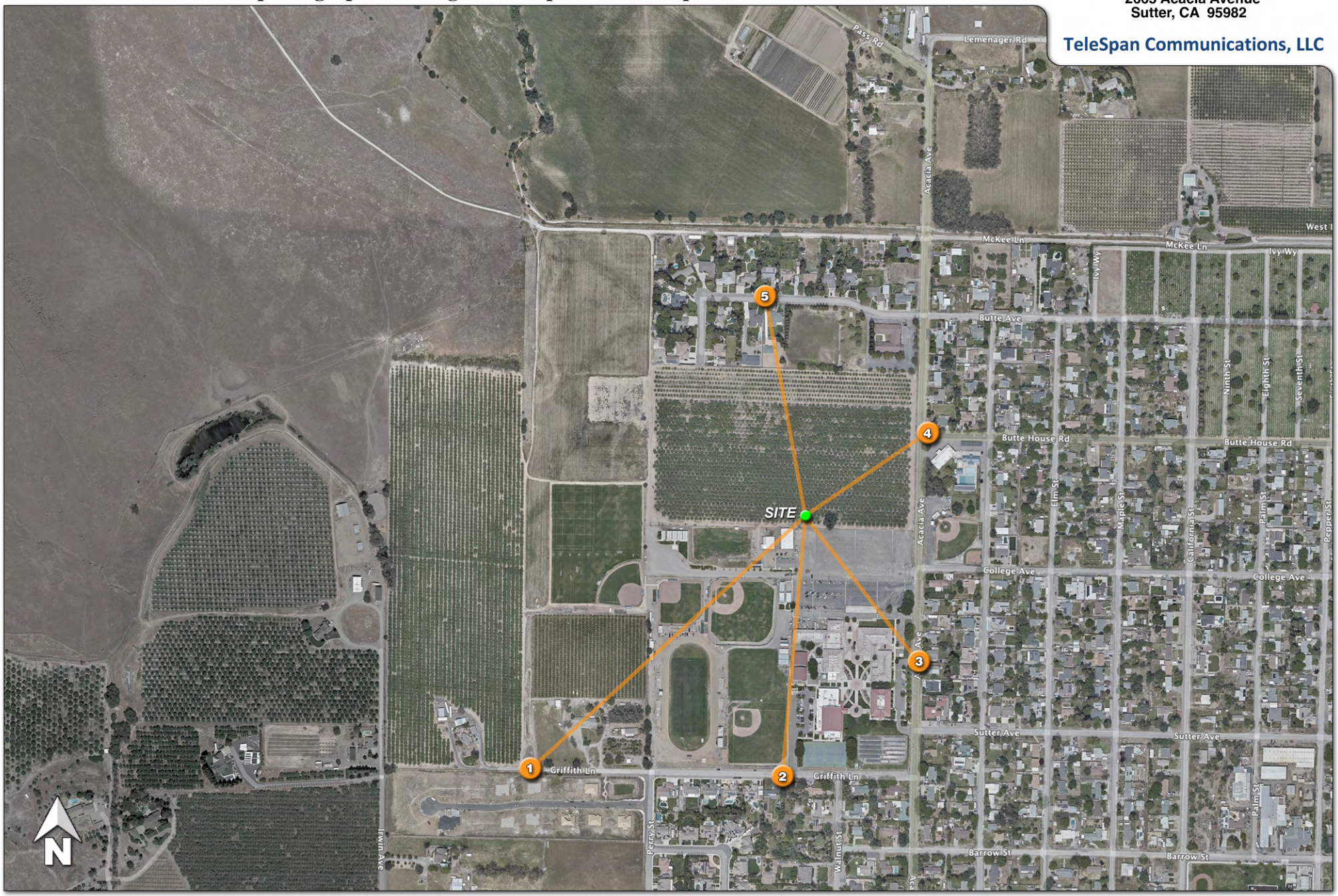
Sutter, CA 95982

TeleSpan Communications, LLC

Aerial photograph showing the viewpoints for the photosimulations.



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Photosimulation of the view looking northeast from the west end of Griffith Lane.

Sutter

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Sutter, CA 95982

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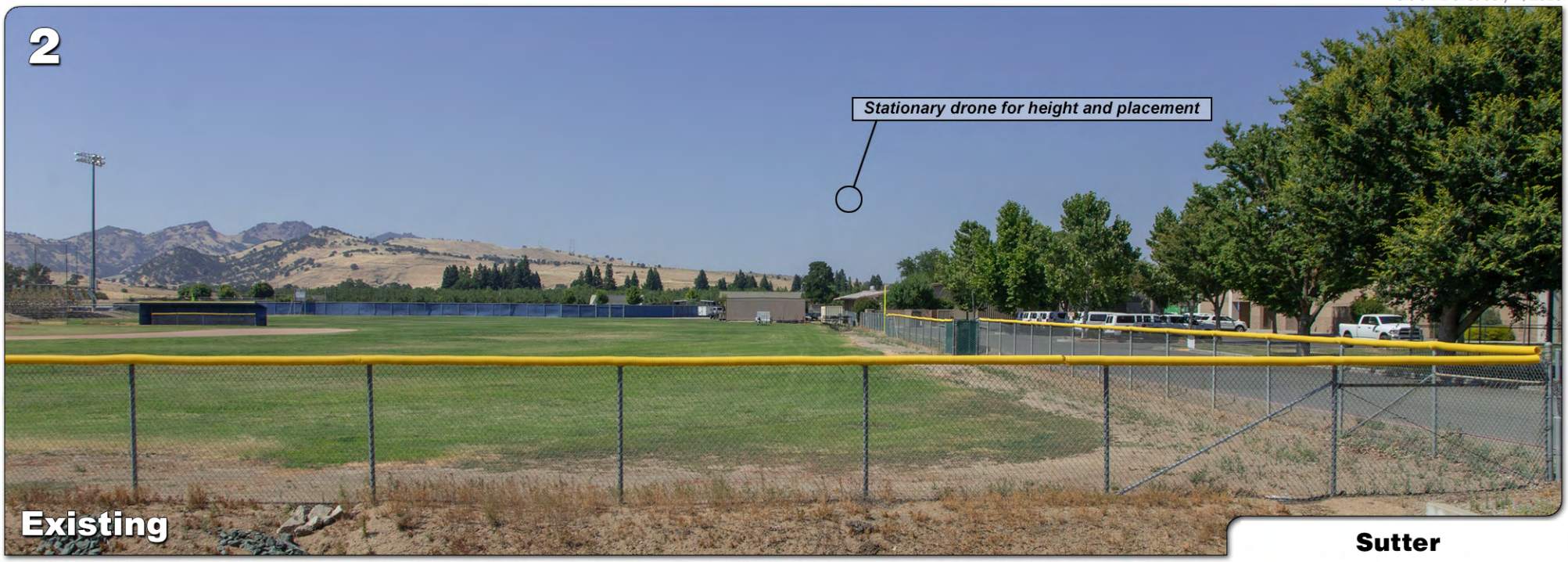

Photosimulation of the view looking north-northwest from Griffith Lane, just west of Walnut Street.

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Photosimulation of the view looking northwest from Acacia Ave in front of the high school admin bldg.

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Photosimulation of the view looking southwest from the west end of Butte House Road at Acacia.

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Photosimulation of the view looking south along Butte Ave.

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Sutter

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TeleSpan Communications, LLC

The drone used to establish exact height and placement.

Flight controller screen during all site photography.

Drone locked in place.

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SiteSafe
A QualTek Company

8618 Westwood Center Drive, Suite 315, Vienna, VA 22182
703.276.1100 ● 703.276.1169 fax
info@sitesafe.com ● www.sitesafe.com

TeleSpan Communications, LLC
Assessment Purpose – Pre-Install
New Build
Site Name – Sutter - High School
Site Compliance Report

2665 Acacia Avenue
Sutter, CA 95982

Latitude: N39-10-03.89
Longitude: W121-45-19.45
Structure Type: Monopine

Report generated date: June 30, 2023
Report by: Leo Romero
Customer Contact: Steve Sweeney

TeleSpan Communications, LLC will be compliant with the FCC Rules and Regulations.

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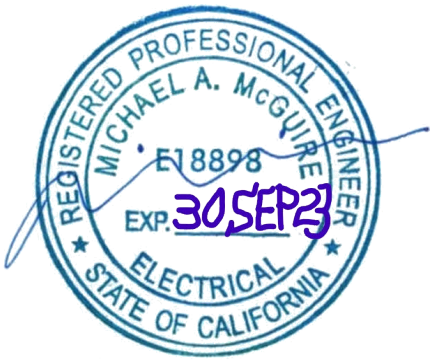
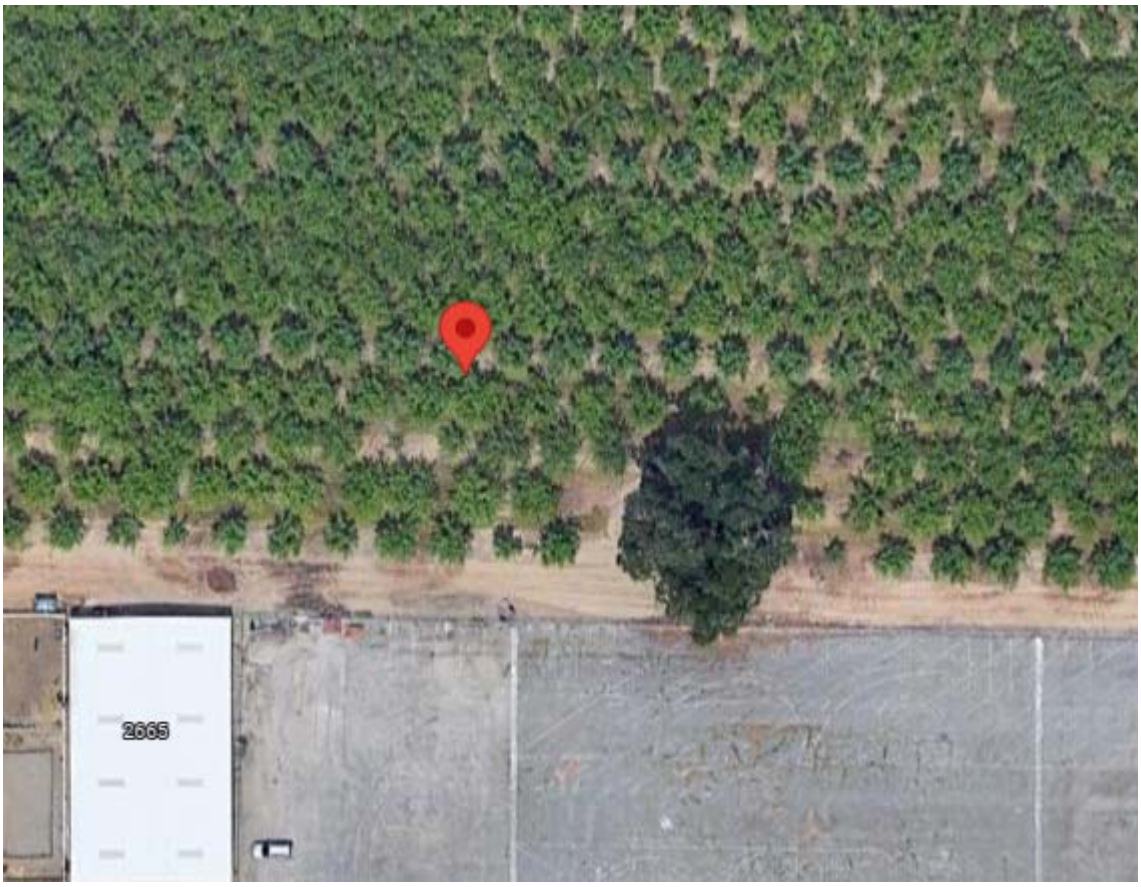


sealed 30jun2023

TeleSpan Communications, LLC
Sutter - High School
Radio Frequency (RF) Site Compliance Report



2665 Acacia Avenue, Sutter, CA 95982

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1 Executive Summary

TeleSpan Communications, LLC has contracted with Site Safe, LLC (Sitesafe), an independent Radio Frequency (RF) regulatory and engineering consulting firm, to determine whether the proposed communications site, Sutter - High School, located at 2665 Acacia Avenue, Sutter, CA, is in compliance with the Federal Communications Commission (FCC) Rules and Regulations for RF exposure.

This report contains a detailed summary of the RF environment at the site including:

- Diagram of the site
- Inventory of the make / model of all antennas
- Theoretical MPE based on modeling

This report addresses exposure to radio frequency electromagnetic fields in accordance with the FCC Rules and Regulations for all individuals, classified in two groups, "Occupational or Controlled" and "General Public or Uncontrolled." The FCC maximum permissible exposure (MPE) limits which apply to these classifications are described in further detail in Section 2 below. There is a 10x safety factor built into the occupational MPE limits with respect to what the FCC has deemed as safe levels of human exposure to electromagnetic fields. Since the General Public MPLE limits are 5x more conservative than the Occupational MPE limits, that equates to a 50x safety factor built into the General Public MPE limits.

The site was evaluated based on (3) wireless carriers transmitting simultaneously at full power and at all licensed frequencies which they are currently operating at their typical macro sites. At every location on the ground, and up to a height of approximately 75' above ground level, the composite electromagnetic field exposure from all carriers will be less than 1% of the allowed General Public MPE limits. The site is fully compliant in all areas at ground level with the FCC Rules and Regulations, as described in OET Bulletin 65.

TeleSpan Communications, LLC proposes to build a new wireless site. The proposed antennas are noted as "Proposed" in the antenna table under Section 4.

This document and the conclusions herein are based on the information provided by TeleSpan Communications, LLC.

If you have any questions regarding RF safety and regulatory compliance, please do not hesitate to contact Sitesafe's Customer Support Department at (703) 276-1100.

2 Site Compliance

2.1 Site Compliance Statement

Sitesafe has determined that:

The site is compliant in all areas at ground level with the FCC Rules and Regulations, as described in OET Bulletin 65**.**

The compliance determination is based on theoretical modeling, proposed antenna inventory and the level of restricted access to the antennas at the site. Any material deviation from the proposed TeleSpan Communications deployment plan could result in the site being rendered non-compliant upon further evaluation.

2.2 Actions for Site Compliance

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance.

The site is compliant in all areas at ground level with the FCC Rules and Regulations, as described in OET Bulletin 65.

Note: For overall compliance, access to the site (i.e., access road, gate, climbing point(s), etc.) must be locked/restricted.

3 Analysis

3.1 RF Exposure Diagram

The RF diagram(s) below display theoretical percentage of the Maximum Permissible Exposure for all systems at the site. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix B.

The key at the bottom of each diagram indicates if percentages displayed are referenced to FCC **General Public** Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

% of FCC Public Exposure Limit

0-5	5-100	100-500	500-5000	5000+

This table displays the maximum theoretical percentage of the FCC's General Public MPE limits:

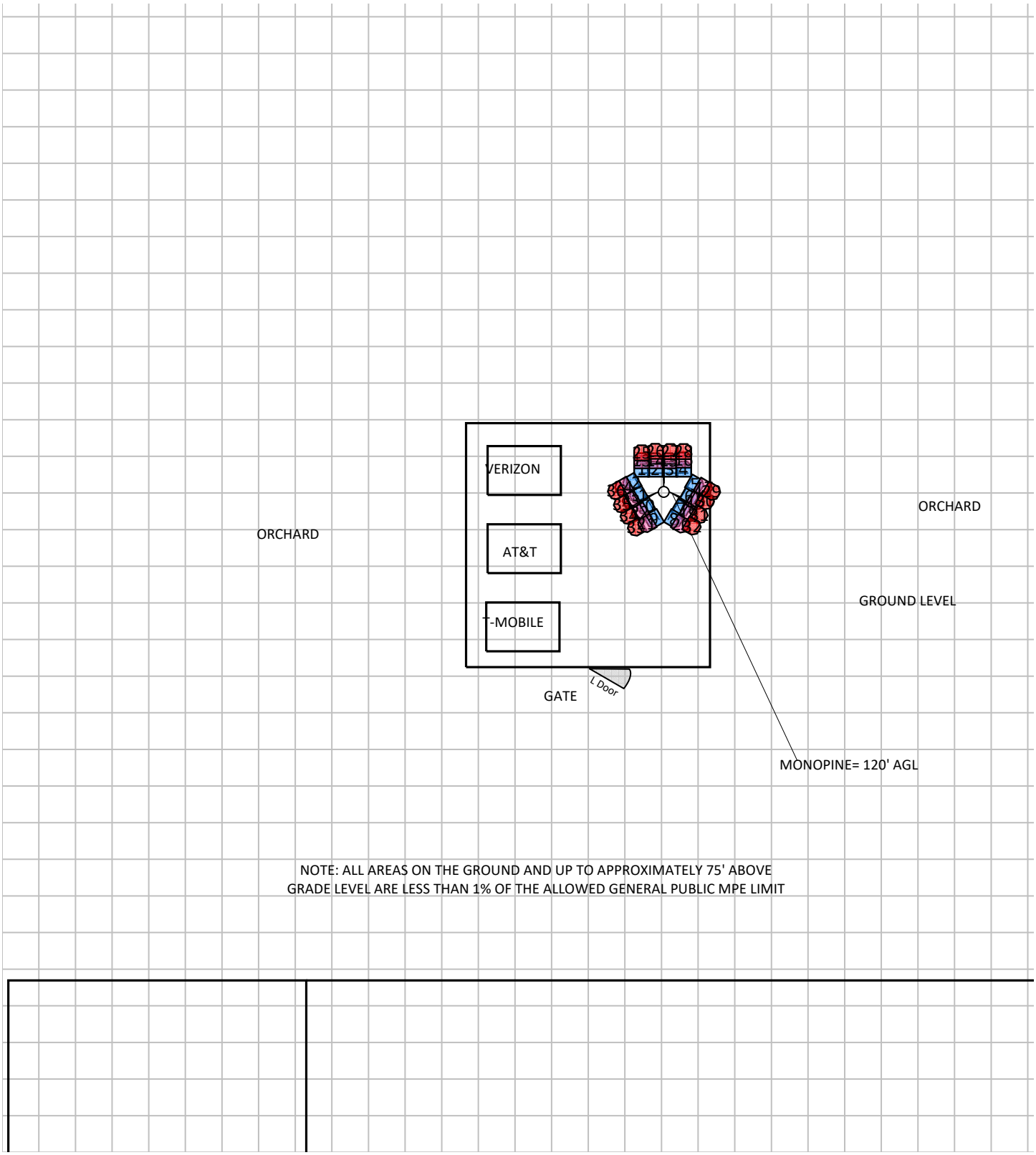
	General Public Levels:
Exposure Type:	**Spatial Average**
Reference Level:	**Ground / Nearby Buildings**
Composite:	<1.0%

Note: On the diagrams shown below, each level is marked with a height. For all diagrams that are marked as *Spatially Averaged*, the modeling program will spatially average the exposure within the area six feet above each set level. This provides an accurate spatial average of the percentage of the FCC's MPE limits within an accessible area.

In the RF exposure simulations below, all heights are reflected with respect to ground level. Each different area, rooftop, or platform level is labeled with its height relative to the main site level. Exposure is calculated appropriately based on the relative height and location of that area to all antennas. The analyzed elevations in the RF exposure simulations are as follows:

- Ground Level = 0'
- Building 1 = 14'
- Buildings 2 and 3 = 10'
- Building 4 = 16'

RF Exposure Simulation For: Sutter
Composite View



NOTE: ALL AREAS ON THE GROUND AND UP TO APPROXIMATELY 75' ABOVE GRADE LEVEL ARE LESS THAN 1% OF THE ALLOWED GENERAL PUBLIC MPE LIMIT

% of FCC Public Exposure Limit

0-5	5-100	100-500	500-5000	5000+

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | DISH | UNKNOWN CARRIER

Barrier Signage Legend

No-sign | Notice | Caution | Warning | Notice 2 | Caution 2 | Warning 2

Existing Barrier | **Proposed Barrier/Sign** | **Remove Barrier/Sign** /X

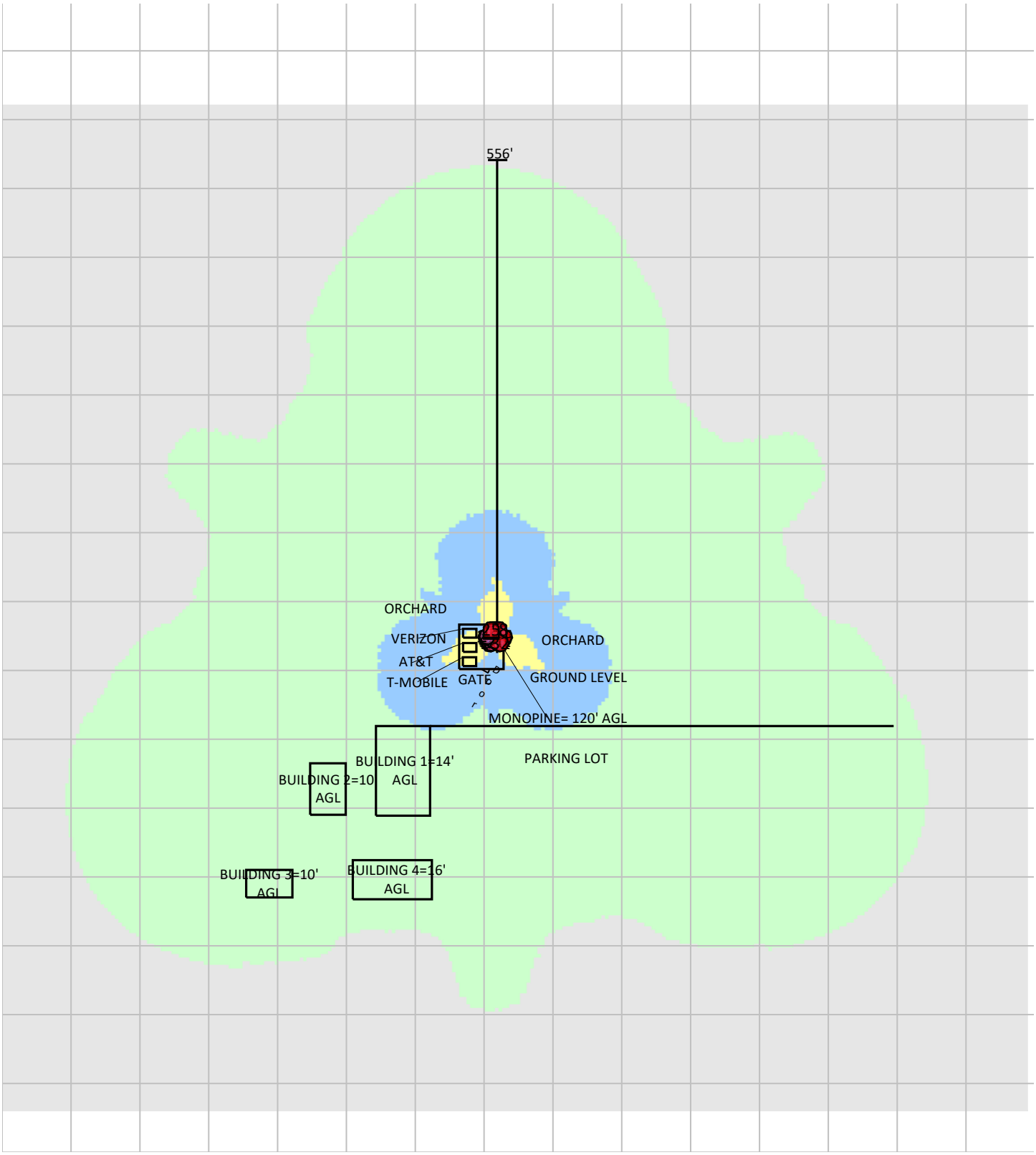
(Feet)

0 14.1 28.2

www.sitesafe.com
6/30/2023 9:22:24 AM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Spatially Averaged

RF Exposure Simulation For: Sutter
Antenna Level – General Public 5-100% MPE Limit Maximum Distance



% of FCC Public Exposure Limit

<1	1-5	5-100	100-500	500-5000	5000+

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | DISH | UNKNOWN CARRIER

Barrier Signage Legend

No-sign | Notice | Caution | Warning | Notice 2 | Caution 2 | Warning 2

Existing Barrier | Proposed Barrier/Sign | Remove Barrier/Sign /X

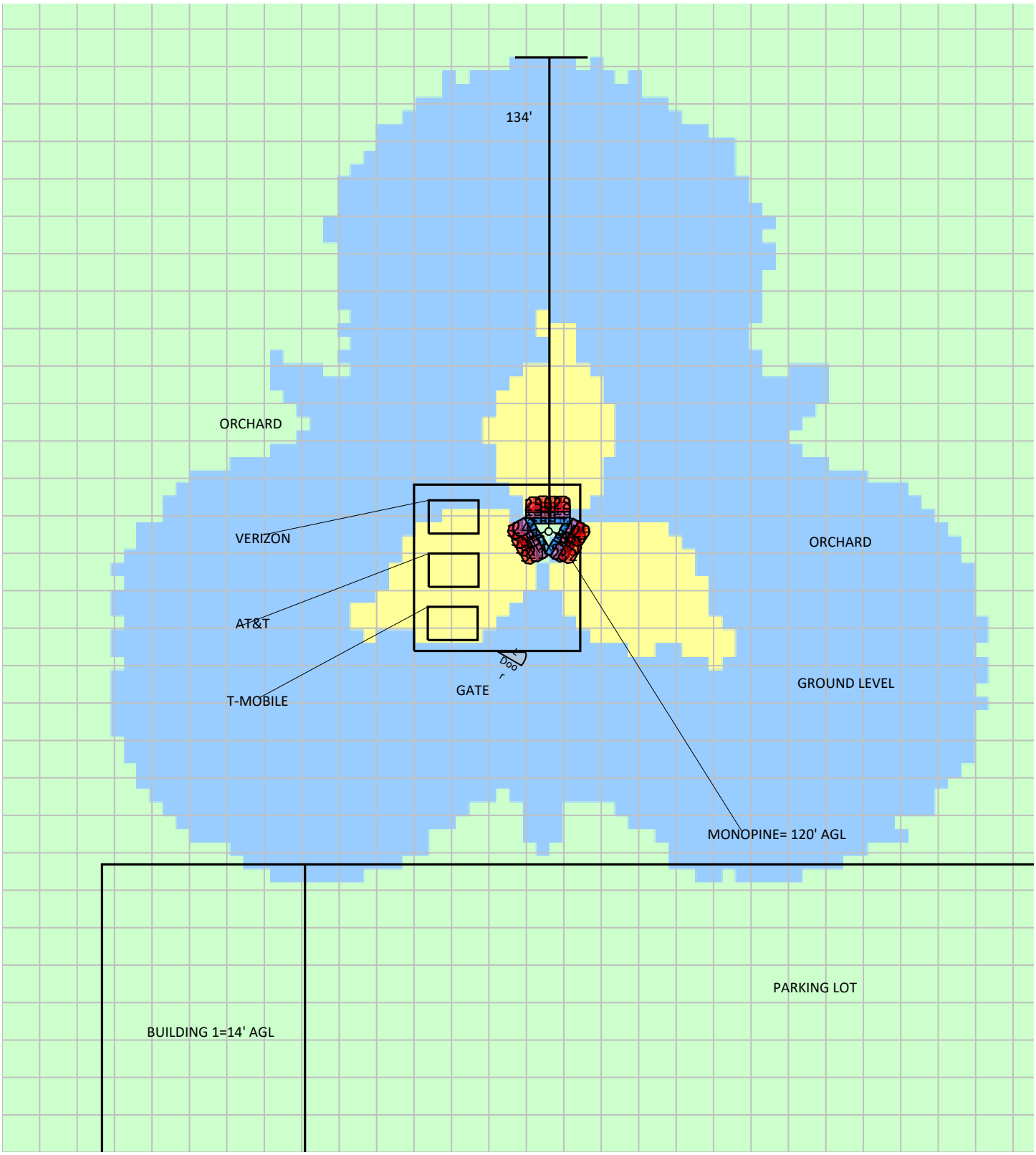
(Feet)

0 77.4 154.8

www.sitesafe.com
6/30/2023 9:49:31 AM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Spatially Averaged

RF Exposure Simulation For: Sutter
Antenna Level – General Public MPE Maximum Distance



% of FCC Public Exposure Limit

<1	1-5	5-100	100-500	500-5000	5000+

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | DISH | UNKNOWN CARRIER

Barrier Signage Legend

No-sign | Notice | Caution | Warning | Notice 2 | Caution 2 | Warning 2

Existing Barrier | **Proposed Barrier/Sign** | **Remove Barrier/Sign** /X

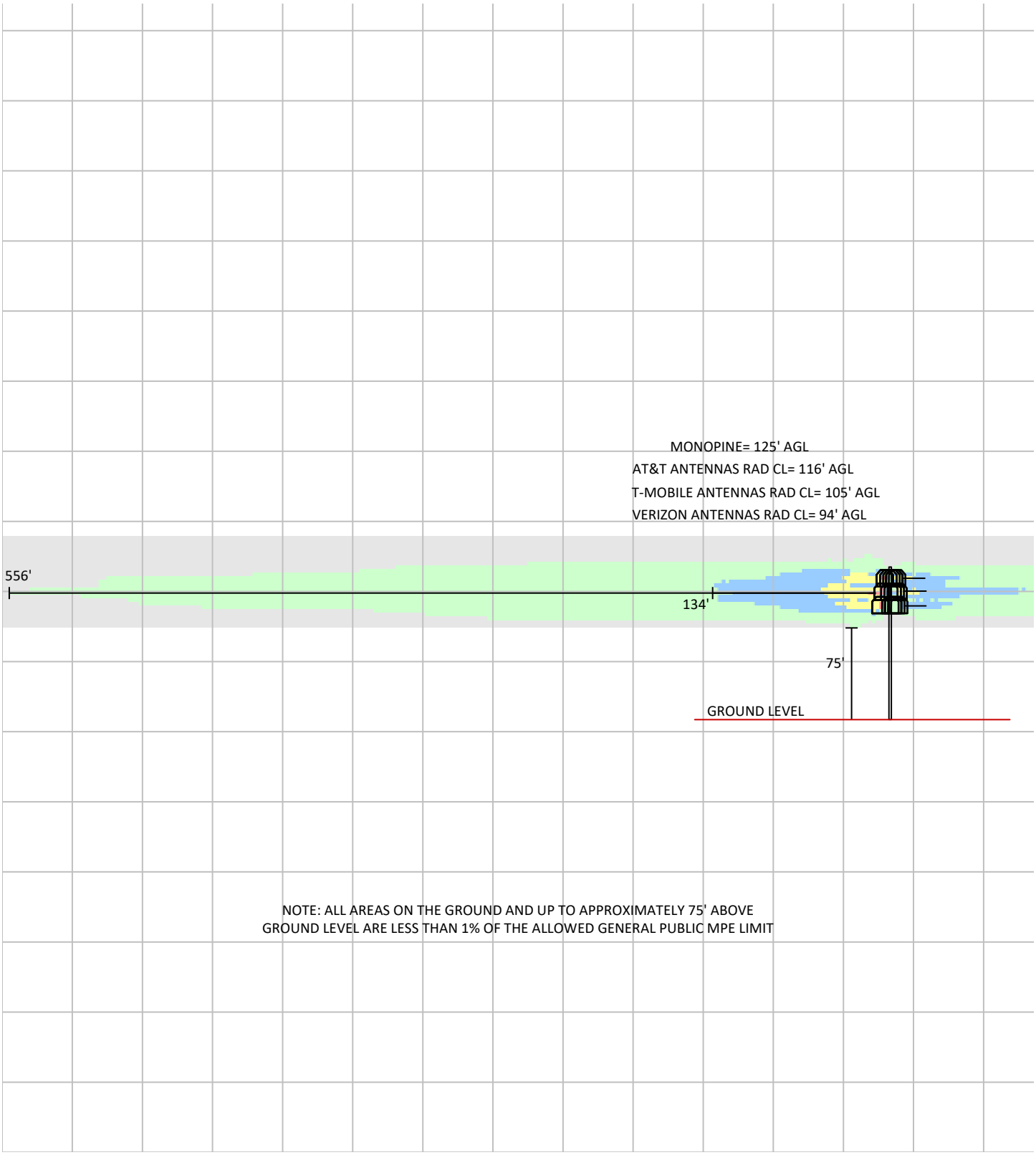
(Feet)

0 20.7 41.4

www.sitesafe.com
6/30/2023 9:52:44 AM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Spatially Averaged

RF Exposure Simulation For: Sutter
Elevation View



NOTE: ALL AREAS ON THE GROUND AND UP TO APPROXIMATELY 75' ABOVE GROUND LEVEL ARE LESS THAN 1% OF THE ALLOWED GENERAL PUBLIC MPE LIMIT

% of FCC Public Exposure Limit

<1	1-5	5-100	100-500	500-5000	5000+

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | DISH | UNKNOWN CARRIER

Proposed Barrier/Sign — **Remove Barrier/Sign** /X

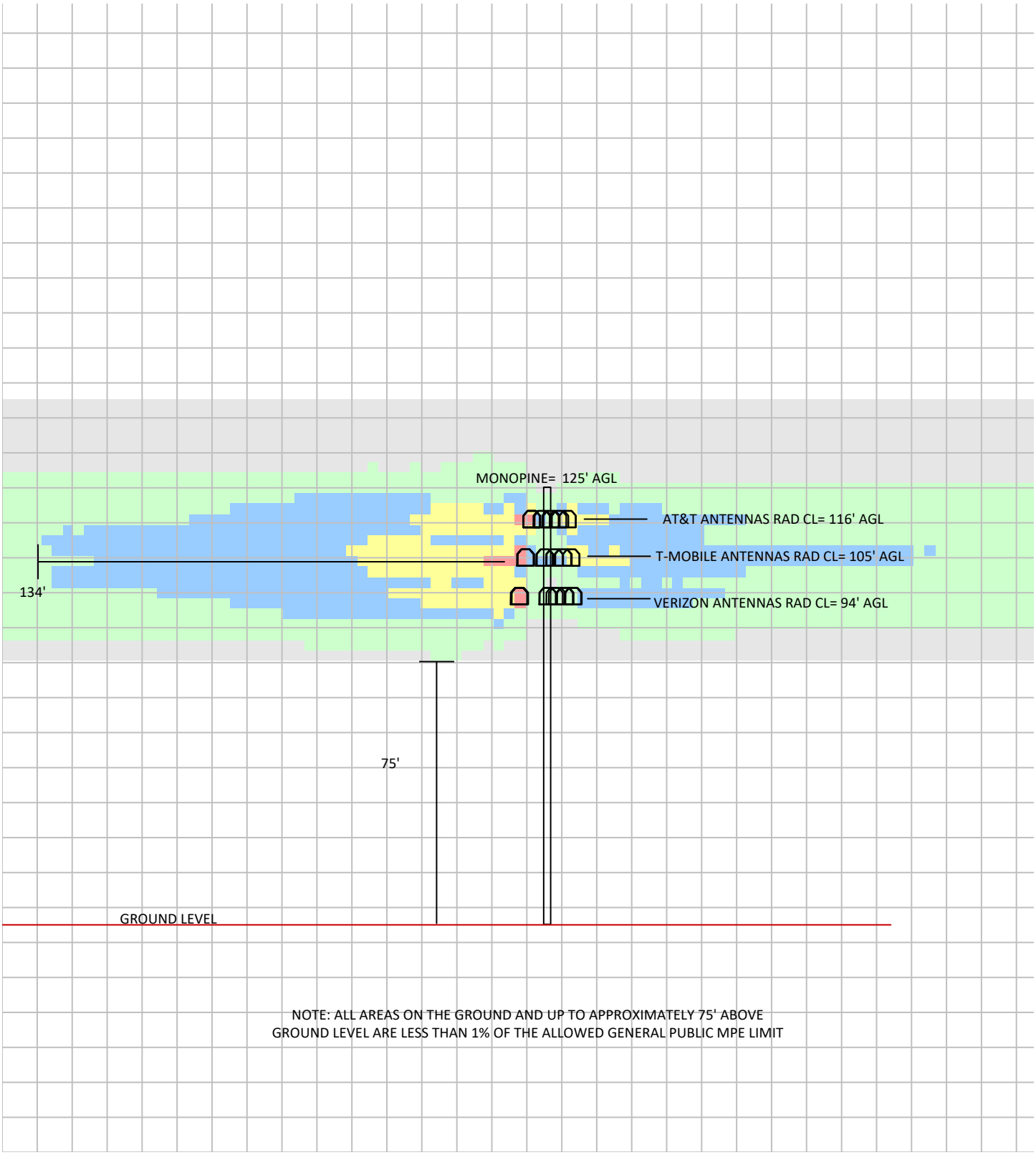
(Feet)

0 113.6 227.2

www.sitesafe.com
6/30/2023 9:15:06 AM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Single Level (0)

RF Exposure Simulation For: Sutter
Elevation Detailed View



NOTE: ALL AREAS ON THE GROUND AND UP TO APPROXIMATELY 75' ABOVE GROUND LEVEL ARE LESS THAN 1% OF THE ALLOWED GENERAL PUBLIC MPE LIMIT

% of FCC Public Exposure Limit

<1	1-5	5-100	100-500	500-5000	5000+

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | DISH | UNKNOWN CARRIER

Proposed Barrier/Sign — **Remove Barrier/Sign** /X

(Feet)

0 20.6 41.2

www.sitesafe.com
6/30/2023 9:17:24 AM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Single Level (0)

4 Antenna Inventory

The Antenna Inventory shows all transmitting antennas at the site. This inventory was provided by the customer and was utilized by Sitesafe to perform theoretical modeling of RF exposure. The inventory coincides with the site diagrams in this report, identifying each antenna's location at Sutter. The antenna information collected includes the following information:

- Licensee or wireless operator name
- Frequency or frequency band
- Transmitter power – Transmitter Power Output ("TPO"), Effective Radiated Power ("ERP"), or Equivalent Isotropic Radiated Power ("EIRP")
- Antenna manufacturer make, model, and gain

For carriers at this site, the use of "Generic" as an antenna modelmeans the information with regard to antenna information was not available nor could it be secured while on site. Equipment, antenna models and nominal transmit power were used for modeling, based on past experience with radio service providers.

The following antenna inventory was provided by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft) (AGL)	MDT (Deg)	EDT (Deg)
1	AT&T MOBILITY LLC (Proposed)	Generic	Panel	737	LTE	0	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
1	AT&T MOBILITY LLC (Proposed)	Generic	Panel	850	LTE	0	65.0	8	14.55	160.00	TPO	Watt	1	1.25	3420.74	116	0	0
1	AT&T MOBILITY LLC (Proposed)	Generic	Panel	1900	LTE	0	65.0	8	16.37	160.00	TPO	Watt	1	1.25	5201.4	116	0	0
2	AT&T MOBILITY LLC (Proposed)	Generic	Panel	763	LTE	0	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
2	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2100	LTE	0	65.0	8	15.76	160.00	TPO	Watt	1	1.25	4519.81	116	0	0
3	AT&T MOBILITY LLC (Proposed)	Generic	Panel	722	LTE	0	65.0	8	13.73	80.00	TPO	Watt	1	1.25	1416.09	116	0	0
3	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2300	LTE	0	58.0	8	15.74	100.00	TPO	Watt	1	1.25	2811.9	116	0	0
4	AT&T MOBILITY LLC (Proposed)	Generic	Panel	3800	5G	0	11.0	2.6	23.50	86.75	TPO	Watt	1	0.00	19421.64	116	0	0
5	AT&T MOBILITY LLC (Proposed)	Generic	Panel	737	LTE	120	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
5	AT&T MOBILITY LLC (Proposed)	Generic	Panel	850	LTE	120	65.0	8	14.55	160.00	TPO	Watt	1	1.25	3420.74	116	0	0
5	AT&T MOBILITY LLC (Proposed)	Generic	Panel	1900	LTE	120	65.0	8	16.37	160.00	TPO	Watt	1	1.25	5201.4	116	0	0
6	AT&T MOBILITY LLC (Proposed)	Generic	Panel	763	LTE	120	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
6	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2100	LTE	120	65.0	8	15.76	160.00	TPO	Watt	1	1.25	4519.81	116	0	0
7	AT&T MOBILITY LLC (Proposed)	Generic	Panel	722	LTE	120	65.0	8	13.73	80.00	TPO	Watt	1	1.25	1416.09	116	0	0
7	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2300	LTE	120	58.0	8	15.74	100.00	TPO	Watt	1	1.25	2811.9	116	0	0
8	AT&T MOBILITY LLC (Proposed)	Generic	Panel	3800	5G	120	11.0	2.6	23.50	86.75	TPO	Watt	1	0.00	19421.64	116	0	0
9	AT&T MOBILITY LLC (Proposed)	Generic	Panel	737	LTE	240	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
9	AT&T MOBILITY LLC (Proposed)	Generic	Panel	850	LTE	240	65.0	8	14.55	160.00	TPO	Watt	1	1.25	3420.74	116	0	0

Ant ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft) (AGL)	MDT (Deg)	EDT (Deg)
9	AT&T MOBILITY LLC (Proposed)	Generic	Panel	1900	LTE	240	65.0	8	16.37	160.00	TPO	Watt	1	1.25	5201.4	116	0	0
10	AT&T MOBILITY LLC (Proposed)	Generic	Panel	763	LTE	240	65.0	8	13.73	160.00	TPO	Watt	1	1.25	2832.17	116	0	0
10	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2100	LTE	240	65.0	8	15.76	160.00	TPO	Watt	1	1.25	4519.81	116	0	0
11	AT&T MOBILITY LLC (Proposed)	Generic	Panel	722	LTE	240	65.0	8	13.73	80.00	TPO	Watt	1	1.25	1416.09	116	0	0
11	AT&T MOBILITY LLC (Proposed)	Generic	Panel	2300	LTE	240	58.0	8	15.74	100.00	TPO	Watt	1	1.25	2811.9	116	0	0
12	AT&T MOBILITY LLC (Proposed)	Generic	Panel	3800	5G	240	11.0	2.6	23.50	86.75	TPO	Watt	1	0.00	19421.64	116	0	0
13	T-MOBILE (Proposed)	Generic	Panel	600	LTE	0	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
13	T-MOBILE (Proposed)	Generic	Panel	600	5G	0	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
13	T-MOBILE (Proposed)	Generic	Panel	700	LTE	0	65.0	8	13.73	160.00	TPO	Watt	1	0.00	3776.77	105	0	0
14	T-MOBILE (Proposed)	Generic	Panel	1900	LTE	0	65.0	8	16.37	280.00	TPO	Watt	1	0.00	12138.3	105	0	0
15	T-MOBILE (Proposed)	Generic	Panel	2100	LTE	0	65.0	8	15.76	280.00	TPO	Watt	1	0.00	10547.71	105	0	0
16	T-MOBILE (Proposed)	Generic	Panel	2500	LTE	0	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0
16	T-MOBILE (Proposed)	Generic	Panel	2500	5G	0	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0
17	T-MOBILE (Proposed)	Generic	Panel	600	LTE	120	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
17	T-MOBILE (Proposed)	Generic	Panel	600	5G	120	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
17	T-MOBILE (Proposed)	Generic	Panel	700	LTE	120	65.0	8	13.73	160.00	TPO	Watt	1	0.00	3776.77	105	0	0
18	T-MOBILE (Proposed)	Generic	Panel	1900	LTE	120	65.0	8	16.37	280.00	TPO	Watt	1	0.00	12138.3	105	0	0
19	T-MOBILE (Proposed)	Generic	Panel	2100	LTE	120	65.0	8	15.76	280.00	TPO	Watt	1	0.00	10547.71	105	0	0
20	T-MOBILE (Proposed)	Generic	Panel	2500	LTE	120	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0

Ant ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft) (AGL)	MDT (Deg)	EDT (Deg)
20	T-MOBILE (Proposed)	Generic	Panel	2500	5G	120	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0
21	T-MOBILE (Proposed)	Generic	Panel	600	LTE	240	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
21	T-MOBILE (Proposed)	Generic	Panel	600	5G	240	68.0	8	13.72	120.00	TPO	Watt	1	0.00	2826.06	105	0	0
21	T-MOBILE (Proposed)	Generic	Panel	700	LTE	240	65.0	8	13.73	160.00	TPO	Watt	1	0.00	3776.77	105	0	0
22	T-MOBILE (Proposed)	Generic	Panel	1900	LTE	240	65.0	8	16.37	280.00	TPO	Watt	1	0.00	12138.3	105	0	0
23	T-MOBILE (Proposed)	Generic	Panel	2100	LTE	240	65.0	8	15.76	280.00	TPO	Watt	1	0.00	10547.71	105	0	0
24	T-MOBILE (Proposed)	Generic	Panel	2500	LTE	240	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0
24	T-MOBILE (Proposed)	Generic	Panel	2500	5G	240	12.5	2.8	22.65	150.00	TPO	Watt	1	0.00	27611.58	105	0	0
25	VERIZON WIRELESS (Proposed)	Generic	Panel	850	CDMA	0	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
26	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	0	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
26	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	0	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
26	VERIZON WIRELESS (Proposed)	Generic	Panel	1900	LTE	0	65.0	8	16.37	160.00	TPO	Watt	1	0.00	6936.17	94	0	0
27	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	0	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
27	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	0	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
27	VERIZON WIRELESS (Proposed)	Generic	Panel	2100	LTE	0	65.0	8	15.76	160.00	TPO	Watt	1	0.00	6027.26	94	0	0
28	VERIZON WIRELESS (Proposed)	Generic	Panel	3700	5G	0	12.0	2.8	23.55	320.00	TPO	Watt	1	0.00	72468.62	94	0	0
29	VERIZON WIRELESS (Proposed)	Generic	Panel	850	CDMA	120	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
30	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	120	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
30	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	120	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0

Ant ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft) (AGL)	MDT (Deg)	EDT (Deg)
30	VERIZON WIRELESS (Proposed)	Generic	Panel	1900	LTE	120	65.0	8	16.37	160.00	TPO	Watt	1	0.00	6936.17	94	0	0
31	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	120	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
31	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	120	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
31	VERIZON WIRELESS (Proposed)	Generic	Panel	2100	LTE	120	65.0	8	15.76	160.00	TPO	Watt	1	0.00	6027.26	94	0	0
32	VERIZON WIRELESS (Proposed)	Generic	Panel	3700	5G	120	12.0	2.8	23.55	320.00	TPO	Watt	1	0.00	72468.62	94	0	0
33	VERIZON WIRELESS (Proposed)	Generic	Panel	850	CDMA	240	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
34	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	240	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
34	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	240	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
34	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	240	65.0	8	14.55	160.00	TPO	Watt	1	0.00	4561.63	94	0	0
35	VERIZON WIRELESS (Proposed)	Generic	Panel	751	LTE	240	65.0	8	13.73	80.00	TPO	Watt	1	0.00	1888.38	94	0	0
35	VERIZON WIRELESS (Proposed)	Generic	Panel	850	LTE	240	65.0	8	14.55	80.00	TPO	Watt	1	0.00	2280.81	94	0	0
35	VERIZON WIRELESS (Proposed)	Generic	Panel	2100	LTE	240	65.0	8	15.76	160.00	TPO	Watt	1	0.00	6027.26	94	0	0
36	VERIZON WIRELESS (Proposed)	Generic	Panel	3700	5G	240	12.0	2.8	23.55	320.00	TPO	Watt	1	0.00	72468.62	94	0	0

Note: The Z reference indicates antenna height above ground level (AGL). ERP values provided by the client and used in the modeling may be greater than are currently deployed. For additional modeling information, refer to Appendix B. Proposed equipment is tagged as *(Proposed)* under *Operator* or *Antenna Make and Model*.

5 Engineer Certification

The professional engineer whose seal appears on the cover of this document hereby certifies and affirms:

That I am registered as a Professional Engineer in the jurisdiction indicated in the professional engineering stamp on the cover of this document; and

That I, Michael A. McGuire, P.E., am currently and actively licensed to provide (in this state/jurisdiction as indicated within the professional electrical engineering seal on the cover of this document) professional electrical engineering services, as an employee of Hurricane Hill Development Company, PLLC, a duly authorized/registered engineering firm (in this state, as applicable) on behalf of Site Safe, LLC; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Leo Romero.

June 30, 2023

Appendix A – Statement of Limiting Conditions

Sitesafe will not be responsible for matters of a legal nature that affect the site or property.

Due to the complexity of some wireless sites, Sitesafe performed this analysis and created this report utilizing best industry practices and due diligence. Sitesafe cannot be held accountable or responsible for anomalies or discrepancies due to actual site conditions (i.e., mislabeling of antennas or equipment, inaccessible cable runs, inaccessible antennas or equipment, etc.) or information or data supplied by TeleSpan Communications, LLC, the site manager, or their affiliates, subcontractors or assigns.

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, observed during the survey of the subject property or that Sitesafe became aware of during the normal research involved in performing this survey. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data provided by a second party and physical data collected by Sitesafe, the physical data will be used.

Appendix B – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The site has been modeled with these assumptions to show the maximum RF energy density. Sitesafe believes this to be a *worst-case* analysis, based on best available data. Areas modeled to predict exposure exposure greater than 100% of the applicable MPE level may not actually occur but are shown as a *worst-case* prediction that could be realized real time. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Thus, at any time, if power density measurements were made, we believe the real-time measurements would indicate levels below those depicted in the RF exposure diagram(s) in this report. By modeling in this way, Sitesafe has conservatively shown exclusion areas – areas that should not be entered without the use of a personal monitor, carriers reducing power, or performing real-time measurements to indicate real-time exposure levels.

Use of Generic Antennas

For the purposes of this report, the use of "Generic" as an antenna model, or "Unknown" for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer's published data regarding the antenna's physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe uses the closest frequency in the antenna's range that corresponds to the highest MPE, resulting in a conservative analysis.

Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio, usually expressed in decibels, of the power required at the input of a loss-free reference antenna to the power supplied to the input of the given antenna to produce, in a given direction, the same field strength or the same power density at the same distance. When not specified otherwise, the gain refers to the direction of maximum radiation. Gain may be considered for a specified polarization. Gain may be referenced to an isotropic antenna (dBi) or a half-wave dipole (dBd) antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are *unaware* of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.

Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.

Appendix C – Rules & Regulations

Explanation of Applicable Rules and Regulations

The FCC has set forth guidelines in OET Bulletin 65 for human exposure to radio frequency electromagnetic fields. Specific regulations regarding this topic are listed in Part 1, Subpart I, of Title 47 in the Code of Federal Regulations. Currently, there are two different levels of MPE - General Public MPE and Occupational MPE. An individual classified as Occupational can be defined as an individual who has received appropriate RF training and meets the conditions outlined below. General Public is defined as anyone who does not meet the conditions of being Occupational. FCC and OSHA Rules and Regulations define compliance in terms of total exposure to total RF energy, regardless of location of or proximity to the sources of energy.

It is the responsibility of all licensees to ensure these guidelines are maintained at all times. It is the ongoing responsibility of all licensees composing the site to maintain ongoing compliance with the FCC Rules and Regulations. Individual licensees that contribute less than 5% MPE to any total area out of compliance are not responsible for corrective actions.

OSHA has adopted and enforces the FCC's exposure guidelines. A building owner or site manager can use this report as part of an overall RF Health and Safety Policy. It is important for building owners/site managers to identify areas in excess of the General Population MPE and ensure that only persons qualified as Occupational are granted access to those areas.

Occupational Environment Explained

The FCC definition of Occupational exposure limits apply to persons who:

- are exposed to RF energy as a consequence of their employment;
- have been made aware of the possibility of exposure; and
- can exercise control over their exposure.

OSHA guidelines go further to state that persons must complete RF Safety Awareness training and must be trained in the use of appropriate personal protective equipment.

In order to consider this site an Occupational Environment, the site must be controlled to prevent access by any individuals classified as the General Public. Compliance is also maintained when any non-occupational individuals (the General Public) are prevented from accessing areas indicated as Red or Yellow in the attached RF exposure diagram. In addition, a person must be aware of the RF environment into which they are entering. This can be accomplished by an RF Safety Awareness class, and by appropriate written documentation such as this Site Compliance Report.

All TeleSpan Communications, LLC employees who require access to this site must complete RF Safety Awareness training and must be trained in the use of appropriate personal protective equipment.

Appendix D – General Safety Recommendations

The following are *general recommendations* appropriate for any site with accessible areas in excess of 100% General Public MPE. These recommendations are not specific to this site. These are safety recommendations appropriate for typical site management, building management, and other tenant operations.

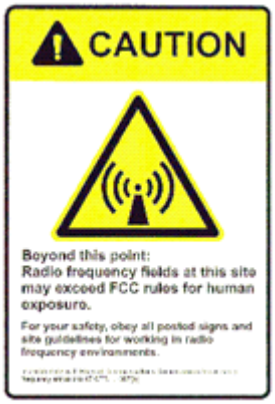
1. All individuals needing access to the main site (or the area indicated to be in excess of General Public MPE) should wear a personal protective monitor (PPM), successfully complete proper RF Safety Awareness training, and have and be trained in the use of appropriate personal protective equipment.

2. All individuals needing access to the main site should be instructed to read and obey all posted placards and signs.

3. The site should be routinely inspected and this or similar report updated with the addition of any antennas or upon any changes to the RF environment including:

- adding new antennas that may have been located on the site
- removing of any existing antennas
- changes in the radiating power or number of RF emitters

4. Post the appropriate **NOTICE**, **CAUTION,** or **WARNING** sign at the main site access point(s) and other locations as required. Note: Please refer to RF Exposure Diagrams in Section 3.1 to inform <u>everyone</u> who has access to this site that beyond posted signs there may be levels in excess of the limits prescribed by the FCC. In addition to RF Advisory Signage, a RF Guideline Signage is recommended to be posted at the main site access point(s). The signs below are examples of signs meeting FCC guidelines.



5. Ensure that the site door remains locked (or appropriately controlled) to deny access to the general public if deemed as policy by the building/site owner.

6. For a General Public environment the five color levels identified in this analysis can be interpreted in the following manner:

- Gray represents areas predicted to be at 5% or less of the General Public MPE limits. *The General Public can access these areas with no restrictions.*

- Green represents areas predicted to be between 5% and 100% of the General Public MPE limits. *The General Public can access these areas with no restrictions.*
- Blue represents areas predicted to be between 100% and 500% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*
- Yellow represents areas predicted to be between 500% and 5000% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*
- Red represents areas predicted to be greater than 5000% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*

7. For an Occupational environment the five color levels identified in this analysis can be interpreted in the following manner:

- Gray represents areas predicted to be at 1% or less of the Occupational MPE limits. *Workers can access these areas with no restrictions.*
- Green represents areas predicted to be between 1% and 20% of the Occupational MPE limits. *Workers can access these areas with no restrictions.*
- Blue represents areas predicted to be between 20% and 100% of the Occupational MPE limits. Workers can access these areas assuming they have basic understanding of EME awareness and RF safety procedures and understand how to limit their exposure.
- Yellow represents areas predicted to be between 100% and 1000% of the Occupational MPE limits. Workers can access these areas assuming they have basic understanding of EME awareness and RF safety procedures and understand how to limit their exposure. Transmitter power reduction and/or time-averaging may be required.
- Red represents areas predicted to be greater than 1000% of the Occupational MPE limits. These areas are not safe for workers to be in for prolonged periods of time. Special procedures must be adhered to, such as lockout/tagout or transmitter power reduction, to minimize worker exposure to EME.

8. Use of a Personal Protective Monitor (PPM): When working around antennas, Sitesafe strongly recommends the use of a PPM. Wearing a PPM will properly forewarn the individual prior to entering an RF exposure area.

Keep a copy of this report available for all persons who must access the site. They should read this report and be aware of the potential hazards with regards to RF and MPE limits.

Additional Information

Additional RF information is available at the following sites:
https://www.fcc.gov/general/radio-frequency-safety-0
https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety

OSHA has additional information available at:
https://www.osha.gov/SLTC/radiofrequencyradiation/index.html

Appendix E – Regulatory Basis

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for evaluating the effects of RF exposure in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

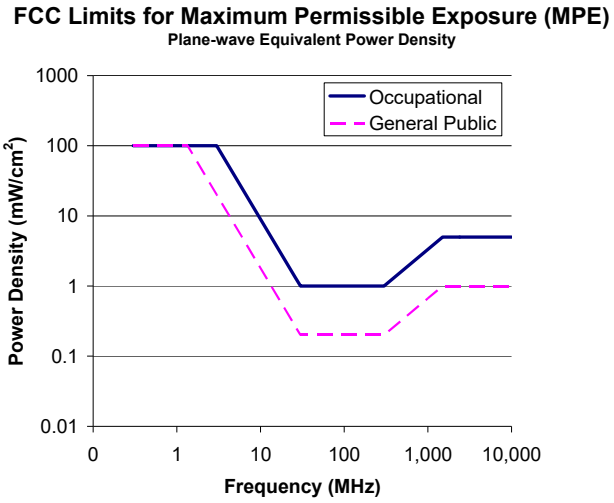
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limits. The General Public limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF hazard signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF hazard signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



Limits for Occupational/Controlled Exposure (MPE)

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
300-1500	--	--	f/300	6
1500-100,000	--	--	5	6

Limits for General Population/Uncontrolled Exposure (MPE)

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
300-1500	--	--	f/1500	30
1500-100,000	--	--	1.0	30

f = frequency in MHz *Plane-wave equivalent power density

Appendix F – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

General Maintenance Work: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

RF Signage: Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

Site RF Exposure Diagram(s): Section 3 of this report contains RF Diagram(s) that outline various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access is restricted and only properly trained individuals can gain access to the antenna locations.