



# City of Elk Grove NOTICE OF EXEMPTION

**To:**  Office of Planning and Research  
P.O. Box 3044, 1400 Tenth Street, Room 22  
Sacramento, CA 95812-3044

Sacramento County Clerk-Recorder  
Sacramento County  
3636 American River Drive  
Sacramento, CA 95864

**From:** City of Elk Grove  
Community Development-Planning  
8401 Laguna Palms Way  
Elk Grove, CA 95758

County Recorder Filing	State Clearinghouse Received
(stamp here)	(stamp here)

PROJECT TITLE: Verizon Halfway Wireless Facility (PLNG24-052)

PROJECT LOCATION - SPECIFIC: 8692 Bader Road, Elk Grove, CA

ASSESSOR'S PARCEL NUMBER(S): 122-0200-003

PROJECT LOCATION – CITY: **Elk Grove**

PROJECT LOCATION – COUNTY: **Sacramento**

PROJECT DESCRIPTION: The Verizon Halfway Wireless Facility Project ("Project") consists of a Conditional Use Permit (CUP) to install a new wireless communication facility on an existing 110-foot-tall PG&E transmission tower with a 12 foot tall extension, and add nine (9) panel antennas, and six (6) remote radio units (RRU) to the tower. The associated ground equipment will be installed on a 300 square foot lease area on concrete pad within an 8-foot tall fence enclosure, which will be connected to a new access roadway from Bader Road. Ground disturbing activities associated with the new wireless facility shall occur between September 1<sup>st</sup> and December 31<sup>st</sup>.

The Applicant's objective with the Project is to improve wireless communication coverage and performance for Verizon customers within the surrounding rural residential neighborhood.

LEAD AGENCY: **City of Elk Grove**  
Community Development -Planning  
8401 Laguna Palms Way  
Elk Grove, CA 95758

LEAD AGENCY CONTACT: Kyra Killingsworth  
916.478.3684  
kkillingsworth@elkgrove.gov

APPLICANT: **Complete Wireless Consulting, Inc.**  
Matt Moore (Representative)  
2009 V Street  
Sacramento, CA 95818  
(916) 247-3047

- EXEMPTION STATUS:
- Ministerial [Section 21080(b); 15268];
  - Declared Emergency [Section 21080(b)(3); 15269(a)];
  - Emergency Project [Section 21080(b)(4); 15269(b)(c)];
  - Preliminary Review [Section 15060(c)(3)]
  - Consistent With a Community Plan or Zoning
  - Categorical Exemption [Class 3 Section 15303(d)]
  - Existing Facilities [Section 15301]

**REASONS WHY THIS PROJECT IS EXEMPT OR DOES NOT REQUIRE FURTHER ENVIRONMENTAL DOCUMENTATION:**

CEQA requires analysis of agency approvals of discretionary "projects." A "project," under CEQA, is defined as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment" (State CEQA Guidelines Section 15378). The proposed Project is a project under CEQA.

The Project is exempt from CEQA pursuant to State CEQA Guidelines Section 15303 (New Construction or Conversion of Small Structures). This exemption provides for the construction and location of limited numbers of new, small facilities or structures. This includes water main, sewage, electrical, gas, and other utility extensions (State CEQA Guidelines 15303[d]). The proposed construction of wireless telecommunication facilities is considered a utility extension.

As mentioned above, neighbors had concern of potential raptors on the existing tower. At the request of the City, Ascent Environmental conducted a field survey in February 2025 and provided a memo to the City and Applicant (dated March 4, 2025). It was noted during the site visit that the on-site annual grassland may have been used as pasture in the past. The Ascent biologist did not observe current or old nesting habitat on the actual tower, but observed a nesting great horned owl about 110 feet from the tower, a small colony of tree swallows about 340 feet from the tower, and red winged blackbird and tricolored blackbird were observed about 600 feet from the tower. The Ascent biologist found that if project activities are conducted during the nonbreeding season (September 1-December 31), no mitigation would be necessary. Here, the Project will be constructed during the non-breeding season as described in the project description above.

During their site visit, the Ascent biologist also observed potential wetlands immediately under the tower and recommended that a qualified biologist conduct a formal wetland delineation of the Project site. A wetland delineation report dated May 5, 2025 from Trileaf Corporation was submitted on behalf of the Applicant. The Trileaf biologist completed a wetland delineation and determined that none of the previously observed inundated areas were wetlands or Waters of the U.S. The City's environmental consultant peer reviewed the report and concurred that the inundated areas are not wetlands or waters of the US. Therefore, no further environmental review is required.

CITY OF ELK GROVE  
Community Development  
Department

By: *Kyra Killingsworth*  
Kyra Killingsworth

Date: June 20, 2025