

ADMINISTRATIVE DRAFT NEGATIVE DECLARATION

Harlan Ranch Cell Tower Major Use Permit

Zone File No. [ZF2024-036]



Prepared for
**Yolo County Department
of Community Services**

Submitted by



June 2025

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1. NEGATIVE DECLARATION

1.1. Project Information

The proposed Project is for a new 140-foot-tall monopole cell tower and associated improvements, built within a 30-foot by 30-foot (900 sq. ft.) AT&T Lease Area located approximately 0.25 mile west of County Road (CR) 99 and approximately 500 feet south of Woodland's city boundary, in unincorporated Yolo County, California. The nearest cross street is CR 99 and Del Mar Street, approximately 1,500 feet to the northeast.

1.2. Introduction

Pursuant to the California Environmental Quality Act (CEQA), Yolo County is preparing an Initial Study (IS) for the proposed Project to determine if any significant adverse effects on the environment would result from project implementation. The IS uses the significance criteria outlined in Appendix G of the CEQA *Guidelines*. If the IS for the project indicates that a significant adverse impact could occur, Yolo County would be required to prepare an Environmental Impact Report.

According to Article 6 (Negative Declaration Process) and Section 15070 (Decision to Prepare a Negative Declaration or Mitigated Negative Declaration) of the CEQA Guidelines, a public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) *The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or*
- (b) *The initial study identifies potentially significant effects, but:*
 - (1) *Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and*
 - (2) *There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.*

Based on the analysis in the Initial Study, it has been determined that all project-related environmental impacts are less than significant and no mitigation measures are required. Therefore, adoption of a Negative Declaration (ND) will satisfy the requirements of CEQA.

1.3. Project Description

AT&T Mobility proposes to construct and operate the Harlan Ranch Cell Tower Project (proposed Project), which would include installation of a new unmanned telecom facility. The proposed Project consists of installing a new 140-foot-tall monopole cell tower with 15 panel antennas, 12 remote radio units, a new pre-manufactured 3 bay 6-feet by 12-feet walk up cabinet (WUC), and back-up emergency generator.

1.4. Environmental Determination

The Initial Study was prepared to identify the potential environmental effects resulting from proposed Project implementation, and to evaluate the level of significance of these effects. The Initial Study relies on information in the County's Use Permit application filed on November 5, 2024; a field survey by Aspen's biologist, Krystal Pulsipher on March 18, 2025; a field survey by Aspen's cultural resources specialist on April 10, 2025; and other environmental analyses.

2. ENVIRONMENTAL DETERMINATION

2.1. 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" and requiring implementation of mitigation as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

2.2. Environmental Determination

On the basis of this initial evaluation:

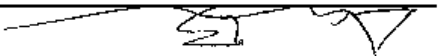
- ☒ I find that the proposed Project COULD NOT have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

- ☐ 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.


Aaron Brown, Assistant Planner
Yolo County Department of Community Services

July 1, 2025
Date

3. INTRODUCTION TO THE INITIAL STUDY

3.1. Proposed Project Overview

This proposed Project (Harlan Ranch Cell Tower Project) is a request for a Major Use Permit for a new freestanding and unstaffed AT&T Mobility telecommunications facility located approximately 0.25 mile west of CR 99 and approximately 500 feet south of Woodland's city boundary, in unincorporated Yolo County, California.

The proposed facility would improve wireless communication coverage to the southwest part of the city of Woodland, and along CR 99. This Project would expand AT&T's network and improve call quality, signal strength, and wireless connection services in Yolo County. The improved wireless service would benefit residents, travelers, agricultural operations, public services, and roadway safety in the area.

The facility would be built within a 30-foot by 30-foot (900 sq. ft.) lease area, within a 23.79-acre privately-owned parcel. The surrounding areas to the south, east, and west of the proposed Project area are agricultural fields. To the north is the City of Woodland, with residential homes.

The proposed Project consists of installing a new 140-foot-tall monopole cell tower with 15 panel antennas, 12 remote radio units, a new pre-manufactured 3 bay 6-feet by 12-feet walk up cabinet (WUC), and back-up emergency generator.

Epic Wireless Group, LLC (Epic Wireless, Applicant, or proponent), working on behalf of AT&T Mobility, submitted a formal application dated November 5, 2024, to Yolo County (County) for a Major Use Permit for the proposed Project. Site plans, photo simulations, and a noise assessment report were also submitted to the County.

3.2. Environmental Process

3.2.1. CEQA Process

This Initial Study (IS) has been prepared pursuant to the California Environmental Quality Act (CEQA), the amended State CEQA Guidelines (14 CCR 15000 et seq.). The purpose of the IS is to inform the decision-makers, responsible agencies, and the public of the proposed Project, the existing environment that would be affected by the project, the environmental effects that would occur if the project is approved, and proposed mitigation measures that would avoid or reduce significant environmental effects.

A Negative Declaration (ND) has been prepared based on the assessment of potential environmental impacts identified in the IS. The proposed Project would not result in potentially significant impacts and there are no mitigation measures proposed; therefore, Yolo County can adopt the ND in accordance with Section 21080 of the CEQA Public Resources Code.

3.2.2. CEQA Lead Agency

Yolo County is the lead agency for review of the project under CEQA because it must make a decision whether to adopt the ND and to approve or deny the Major Use Permit.

3.2.3. Initial Study

The IS presents an analysis of potential effects of the proposed Project on the environment. The IS is based on information from AT&T Mobility, site visits, data responses, and additional research.

Construction activities and project operation could have direct and indirect impacts on the environment. The following environmental parameters are addressed based on the potential effects of the proposed

Project and potential growth-inducing or cumulative effects of the Project in combination with other projects:

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

The IS has been organized into the following sections:

- Section 3: Introduction. Provides an introduction and overview describing the proposed Project and the CEQA process, and identifies key areas of environmental concern.
- Section 4: Project Description. Presents the project objectives and provides an in-depth description of the proposed Project, including construction details and methods.
- Section 5: Environmental Analysis. Includes a description of the existing conditions and analysis of the proposed Project's potential environmental impacts.
- Section 6: Authors and Reviewers. List the authors who prepared the IS and reviewers who reviewed the IS.
- Section 7: References. Lists the sources of information used to prepare the IS.
- Appendix A: Photo Simulations
- Appendix B: AQ/GHG CalEEMod Outputs
- Appendix C: Cultural Resources Assessment Report
- Appendix D: Noise Analysis
- Appendix E: Roadway Construction Noise Model Outputs

4. PROJECT DESCRIPTION

AT&T Mobility proposes to construct and operate the Harlan Ranch Cell Tower Project (proposed Project), which would include installation of a new unmanned telecom facility. The proposed Project consists of installing a new 140-foot-tall monopole cell tower with 15 panel antennas, 12 remote radio units, a new pre-manufactured 3 bay 6-feet by 12-feet walk up cabinet (WUC) and back-up emergency generator.

4.1. Project Title

Harlan Ranch Cell Tower Project

4.2. Lead Agency Name and Address

Yolo County Department of Community Services
Planning Division
292 West Beamer Street
Woodland, CA 95695

4.3. Lead Agency Contact Person and Phone Number

Aaron Brown, Assistant Planner
Yolo County Department of Community Services
Planning Division
292 West Beamer Street
Woodland, CA 95695

4.4. Project Location

The Proposed Project will be built within a 30-foot by 30-foot (900 sq. ft.) AT&T Lease Area on an approximately 24-acre parcel located approximately 0.25 mile west of CR 99 and approximately 500 feet south of Woodland's city boundary, in unincorporated Yolo County, California. The nearest cross street is CR 99 and Del Mar Street, approximately 1,500 feet to the northeast.

Topographic Quad (USGS 7.5"):	Woodland
Topographic Quad Coordinates:	38.654347,-121.789097
Latitude/Longitude	Latitude 38° 39' 15.65"/Longitude -121° 47' 20.75"
APN	039-030-017
Site Access:	Existing gravel road off CR 99, Woodland, CA 95695

Figure 4-1, Regional Location Map depicts the location of the Project in a regional setting, and Figure 4-2, Project Site, illustrates the proposed site.

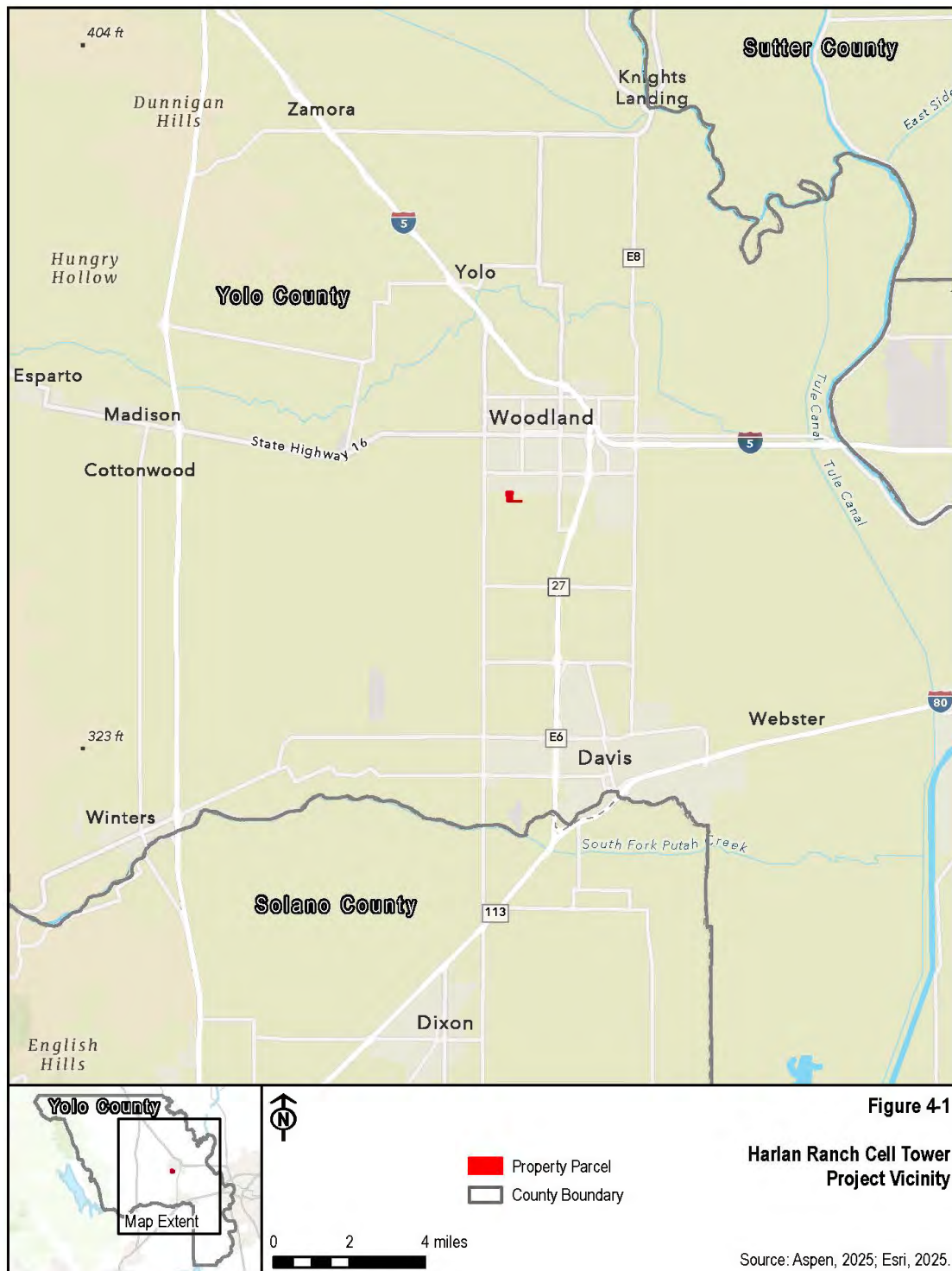
Figure 4-1: Regional Location Map

Figure 4-2: Project Site

4.5. Project Sponsor's Name and Address

Carl Jones, AT&T Representative
AT&T Mobility c/o Epic Wireless Group, LLC
605 Coolidge Dr, Suite 100
Folsom, California 95630
(916) 798-2275

4.6. General Plan Designation

According to Yolo County 2030 General Plan, the parcel's land use is designated as Agriculture (AG) (Yolo County 2009).

4.7. Zoning

The parcel is zoned as Agricultural Intensive (A-N).

4.8. Surrounding Land Uses and Setting

The parcel for the Proposed Project is currently irrigated crop fields on flat farmland. A small area, measuring 30-foot by 30-foot (900 sq. ft.) of existing crops would be removed for the proposed Lease Area. Aside from this, there are no other changes in farming operations proposed.

There are no existing structures on the property. On the adjacent property, there is an existing diesel tank, well, meter pole, and concrete basin. There is an existing unpaved private driveway within the property, which runs from CR 99 to the lease area. There are no existing buildings or structures within the proposed AT&T Mobility lease area for the Project site.

The parcels to the south, east, and west of the Proposed Project area are zoned A-N with irrigated crops and fields. The parcels to the north are part of the incorporated City of Woodland and contain residential homes (Yolo County 2009). The closest residential homes would be located approximately 600 feet north and 2,000 feet southeast from the Proposed Project area.

4.9. Project Overview

AT&T offers its customers multiple services such as voice calls, text messaging, mobile email, picture/video messaging, mobile web, navigation, broadband access, V CAST, and Enhanced 911 services. Mobile phone use has become an important system for public safety. For example, motorists with disabled vehicles (or worse) can use their phone to call in and request appropriate assistance. Furthermore, as a backup system to traditional landline phone service, mobile phones have proven to be extremely important during natural disasters and other emergencies. Wireless service enhances public safety and emergency communications in the community.

Epic Wireless Group, LLC (Epic Wireless or Applicant), working on behalf of AT&T Mobility, submitted a formal application on November 5, 2024, to Yolo County (County) for a Major Use Permit for a new AT&T Mobility telecommunications facility located off of County Road 99 in unincorporated Yolo County, just south of the City of Woodland, California. Site plans, photo simulations, and a noise assessment report were also submitted to the County.

4.9.1. Project Objectives

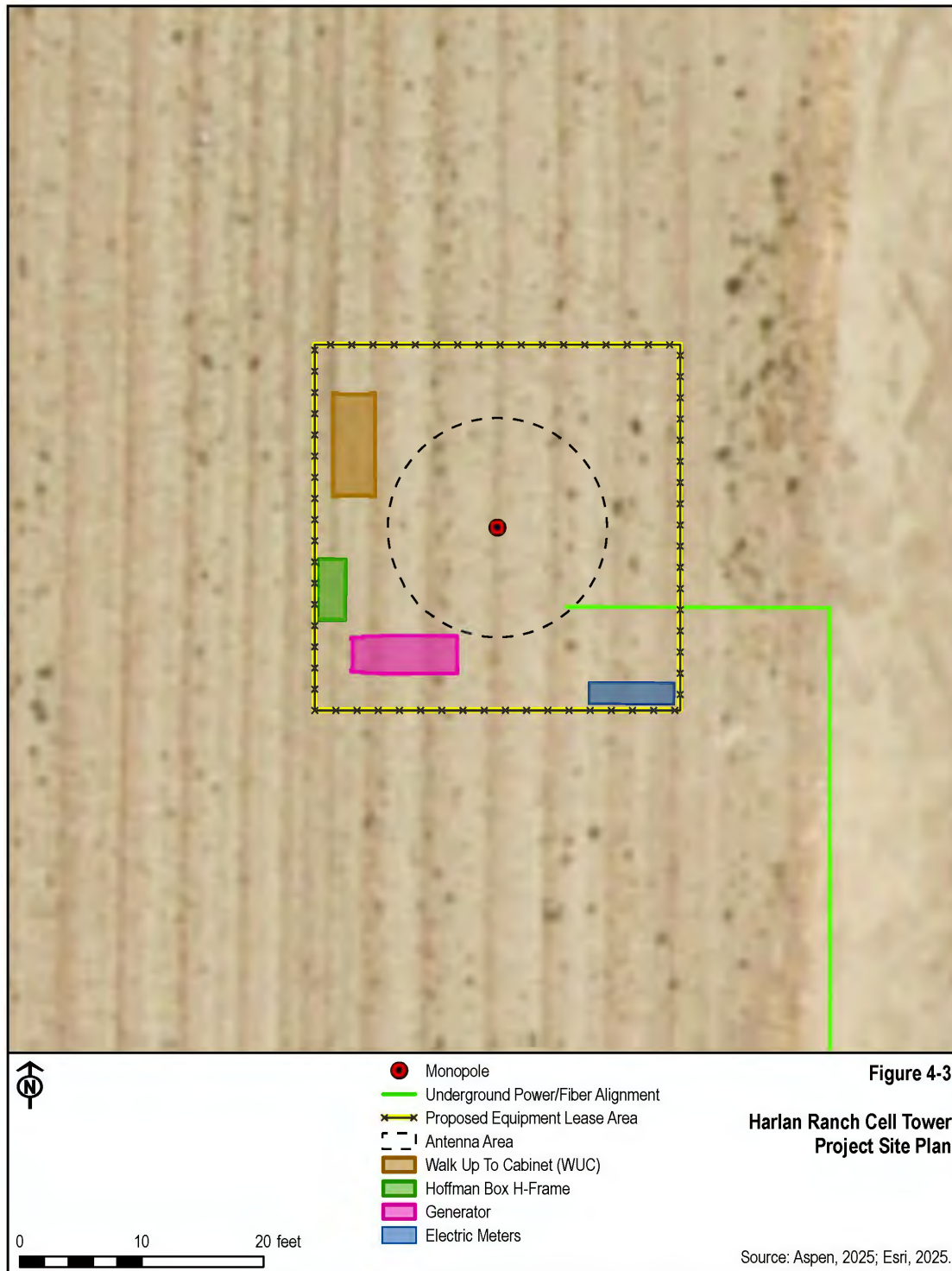
The proposed facility is needed to bring improved wireless communication coverage to the southwest part of the city of Woodland, along CR 99, and the nearby unincorporated area.

This Project would expand AT&T's network and improve call quality, signal strength, and wireless connection services in Yolo County. The improved wireless service would benefit residents, travelers, agricultural operations, public services, and roadway safety in the area.

4.10. Project Components

AT&T Mobility proposes to install a new wireless communications facility (Harlan Ranch Cell Tower) at CR 99, Woodland, California. The Proposed Project consists of the following components (see Figure 4-3, Site Plan):

- Development of a 30-foot by 30-foot (900 square feet, or 0.021 acres) cell tower pad area that would have an all-weather surface (gravel paving atop geofabric layer) on portions not used for equipment installation, within a 23.79-acre privately-owned parcel.
- Temporary disturbance area of approximately 10-foot by 30-foot adjacent to the 30-foot by 30-foot permanent disturbance area during construction for equipment staging and fence installation.
- Installation of a 140-foot-tall monopole co-locatable tapered telecommunications tower (cell tower) with footing depths of a minimum of 8 feet and a maximum of 45 feet.
- Installation of an antenna T-Arm mount on the pole.
- Installation of 12 panel antennas on mast pipes.
- Installation of a 6-foot-tall chain link fence with 3 strands barbed wire surrounding the telecommunications site, and a 12-foot-wide access gate.
- Installation of pre-manufactured 3 bay 6-feet by 12-feet cabinet.
- Installation of DC50 box and GPS unit on the 3 bay walk up cabinet (WUC).
- Construction of a 4-feet by 9-feet concrete slab, 6 inches deep for the WUC.
- Installation of a 10-foot-tall ice bridge with three stacked fiber management boxes on ice bridge post.
- Installation of a 30-kW diesel backup generator placed on a 5-foot by 10-foot concrete slab.
- Installation of a utility H-Frame on conic footings with a Hoffman Box, Ciena network, meter with disconnect, fire extinguisher, ATS, and security light.
- Installation of 12 remote radio units (RRUs) (4 per sector) and 3 squid surge protectors.
- Installation of 9 DC trunks and 3 fiber trunks.
- Trenching (minimum 27 inches deep, maximum of 50 inches deep) and installation of 200 feet of underground power and 2,400 feet of fiber service lines (overhead or underground via boring) within a 15-foot-wide utility and access easement between the tower site and existing power pole/line to the northeast of tower site.
- Improvement of existing access road to cell tower area from CR 99: conversion from a 15-foot-wide gravel road to a 15-foot-wide all-weather gravel access road approximately 1,650 feet long.

Figure 4-3: Site Plan

4.11. Project Construction

4.11.1. Construction Schedule

Following receipt of applicable permits, completion of final engineering, and material procurement activities, construction of the proposed Project is estimated to start in March 2026. Construction is expected to take approximately 90-120 days. Construction would primarily occur Monday through Friday (5 days a week) between 8:00 a.m. and 6:00 p.m. The expected operational date for the completed project is July 2026.

4.11.2. Pre-Construction Activities

4.11.2.1. Access Road Improvement

Access to the proposed cell tower site would be from CR 99, an existing gravel road. AT&T Mobility proposes a 15-foot-wide non-exclusive access and utility easement from CR 99 to the lease area, a distance of approximately 2,400 feet. Grading and trenching are not needed for access to the Project site and any minor ground disturbance would stay within the 15-foot easement corridor. Minor road improvements may be required, and would include adding road base/aggregate crushed rock, then compacting it.

New underground and/or overhead utilities would be extended into the project site a distance of approximately 2,400 feet within a proposed 15-foot-wide utility and access easement, either underground, or overhead on existing power poles. If the utilities would be placed underground, they would be placed via boring. No trenching would be used for installation of the fiber optic line. The utility easement would connect the Hoffman Box H-Frame to an existing electric meter and pole transformer via an underground fiber and power service lines.

4.11.2.2. Equipment Staging Areas

Staging areas for contractor equipment and materials would be within the proposed permanent and temporary disturbance areas of the proposed cell tower site and the access easement.

If additional areas are needed, AT&T Mobility (with the assistance of a biologist), will review the Project area and locate staging areas that are in previously disturbed areas that would not have potential to affect sensitive wildlife habitat or species. All new staging areas will be approved by Yolo County prior to use.

4.11.2.3. Establish Work Areas

Project site boundaries will be clearly delineated by stakes and/or flagging to minimize inadvertent degradation or loss of adjacent habitat during construction activities. Signs and/or fencing will be used to provide access restrictions for vehicles and equipment unrelated to Project construction.

The proposed permanent disturbance area is 0.021 acre, or 900 square feet (30-foot x 30-foot) for the cell tower pad. There would be temporary disturbance areas immediately surrounding the cell tower's permanent disturbance area, including 300 square feet (10-foot by 30-foot) for equipment staging and fencing, 200 square feet for trenching to bury the underground power line, and 2,400 square feet for burying the fiber optic line from CR 99 to the site location, within a utility easement. The total area of temporary disturbance would be about 0.071 acres (3,100 square feet).

4.11.3. Construction Activities

Prior to the start of construction, and at least 48 hours before proceeding with any excavation or site work, the contractor would contact Underground Service Alert (USA). The contractor would verify all existing utilities, both horizontal and vertically, prior to the start of construction.

All equipment and materials would be installed according to manufacturer's recommendations unless specifically indicated otherwise, or where local codes or regulations take precedence. All construction activities could be done concurrently with the exception of improving the access road, which must be completed first because it would be needed to transport any materials to the site location. Construction activities would include:

- Road improvements
- General excavation and trenching (including the underground utilities)
- Installation of the tower including foundation construction and assembly
- Utility run and fiber optic installation
- Any excess soil spoils would be left on-site unless otherwise required by environmental regulations.

4.11.4. Erosion Control and Restoration

As required by the standard conditions of approval for this Project, best management practices (BMPs) for erosion control as restoration, would be incorporated in the construction of the Project to minimize erosion. BMPs would include a silt fence or other sediment control devices that would be placed around the construction site to contain spoils from construction excavation activities.

Any drain disturbed during construction would be returned to its original condition prior to completion of work. The permanent disturbance area for the cell tower site would be graveled. Any damage to the existing access road would be repaired to the condition it was in prior to AT&T's construction.

4.11.5. Construction Workforce and Equipment

Construction is anticipated to take approximately 90 days. The crew size would range from five to six individuals throughout the duration of the proposed Project construction. Construction activities will typically occur between 8:00 a.m. and 6:00 p.m. on weekdays, but may occasionally begin as early as 7:00 a.m. on weekdays and also occur from 7:00 a.m. to 6:00 p.m. on Saturdays and 9:00 a.m. to 6:00 p.m. on Sundays.

Construction equipment that would be used for the Project include:

Table 4-1: Typical Construction Equipment to be Used

Equipment	Activity		
	Site Preparation	Tower Installation	Site Restoration
Various Small Crew Vehicles	X	X	
Backhoe Loader	X	X	
Loader	X	X	
Rock Hammer	X		
Soil Vibratory Compactor	X	X	X
Jackhammer		X	
Auger Truck		X	
Crane		X	
Excavator		X	
Concrete Trucks		X	

Equipment	Activity		
	Site Preparation	Tower Installation	Site Restoration
Compressor	X	X	
All Terrain Forklift	X	X	
Man Lifts		X	
Large 53' Flatbed Truck	X		

4.11.6. Water Requirements

Due to limited ground disturbance and excavation activities during construction, a water truck would not be needed on-site. AT&T Mobility would comply with dust control measures required by the Yolo-Solano Air Quality Management District (YSAQMD), which may require the delivery of limited water for dust control.

4.12. Operations and Maintenance

Operations at the unmanned facility will occur 12 months a year, 7 days a week, 24 hours a day consistent with the continuous schedule of normal telephone company operations. The heating, ventilation, and air conditioning (HVAC) unit would run as needed, dependent upon ambient temperature. It is possible during a heat wave that the HVAC unit may run continuous for 24 hours. Under normal operation, the HVAC unit functions like a residential unit, turning on and off as needed to maintain the temperature set points.

An AT&T service technician would visit the site once every six to eight weeks to check the facility and perform any necessary maintenance. The standby generator (for use during emergency power outages) would be operated for approximately 10 to 15 minutes per month for maintenance purposes. Testing and maintenance would take place weekdays between 8:00 a.m. and 6:00 p.m. The generator has a capacity of 190 gallons, and no additional fuel will be stored on site.

4.13. Other Permits and Approvals

In addition to the Major Use Permit, Table 4-2 summarizes the permits from other federal, state, and local agencies that may be needed for the Project. All necessary permits/approvals would be obtained prior to construction to ensure compliance with all applicable regulations and requirements throughout project implementation.

Table 4-2: Permits that May Be Required for the Harlan Ranch Cell Tower Project

Agency	Jurisdiction	Requirements
Federal/State Agencies		
California Department of Transportation	Highways and State-owned roadways	Transportation Permit for movement of vehicles that may qualify as an oversized or excessive load (if required)
California Office of Historic Preservation	Consultation (through CEQA review process)	Cultural resources management (if appropriate)
California Department of Fish and Wildlife	Endangered species consultation	Consultation on State-listed species; beyond those covered by the Yolo HCP/NCCP
Local/Regional Agencies		

California Air Resources Board (CARB) or Air Quality Management District (AQMD)	Portable Equipment Registration or Air Quality Permit to Operate	Portable equipment subject to local air quality permitting requirements, such as generators or air compressors, must either be registered under the CARB Portable Equipment Registration Program (PERP) or obtain a local air quality permit to operate.
Yolo County	Building and Grading Permits and Safety Requirements	Ministerial approval for construction of new facilities
Yolo County	Roadway Encroachment and/or Transportation Permit	Ministerial approval for possible closure of roads for transportation of heavy or oversized equipment and construction of facilities within public roadway right-of-way
Yolo Habitat Conservancy	Yolo HCP/NCCP	Ministerial approval for incidental take permitting of covered projects in place of California Department of Fish and Wildlife

4.14. Yolo Habitat Conservation Plan/Natural Community Conservation Plan

This Project is covered under the Yolo HCP/NCCP and is required to comply with all applicable Avoidance and Minimization Measures (AMMs) required by that plan (Yolo Habitat Conservancy, 2018). The applicable AMMs applied to the Project or required in the conditions of approval for the Project, are listed in Section 5.4 (Biological Resources).

5. ENVIRONMENTAL ANALYSIS

5.1. Aesthetics

AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) In non-urbanized 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.1.1. Setting

Aesthetics, as addressed in the California Environmental Quality Act (CEQA), refers to visual considerations in the physical environment. Aesthetics analysis, or visual resource analysis, is a systematic process to logically assess visible change in the physical environment and the anticipated viewer response to that change. The Aesthetics section describes the existing landscape character of the Project area, existing views of the Project area from various on-the-ground vantage points, the visual characteristics of the proposed Project, and the landscape changes that would be associated with the construction and operation of the proposed Project as seen from various vantage points.

Visual resources at and near the proposed Project's site were assessed and potential visual changes due to Project were evaluated. Visual resources of the Project area were investigated based on the following criteria: (1) existing visual quality and scenic attributes of the landscape; (2) location of sensitive receptors in the landscape; (3) assumptions about receptors' concern for scenery and sensitivity to changes in the landscape; (4) the magnitude of visual changes in the landscape that would be brought about by construction and operation of the proposed Project; and (5) compliance with state, county, and local policies for visual resources. The evaluation of potential changes in the area's visual character is presented in the following paragraphs.

Existing Landscape Setting and Viewer Characteristics

This section discusses the existing visual character of the region, existing visual quality in the Project area; viewer concern, and viewer exposure to the proposed Project, leading to a rating of overall visual sensitivity. Also discussed are the existing sources of light and glare within the Project area.

Aesthetic Context of the Project and its Vicinity. The proposed Project parcel is located on the valley floor, with flat topography, within a parcel historically used for agricultural cultivation. The proposed Project would be built within a 30-foot by 30-foot AT&T Lease Area located off of CR 99 and approximately 500 feet south of Woodland's city boundary, in unincorporated Yolo County. The Project is located 0.25 mile west of the CR 99 centerline. The nearest cross street is CR 99 and Del Mar Street. Access to the site would be from CR 99 using the existing unpaved private driveway on the site, see Figure 4-2, Project Site.

The site is zoned as Agricultural Intensive (A-N) and is designated as Agricultural land use in the Yolo County General Plan. The surrounding area to the east, south, west, and north consist of flat agricultural land uses, while the area to the north, beyond an agricultural row crop field, consists of single-family residences in the incorporated city of Woodland. The parcels to the south, east, and west of the proposed Project area are zoned Agricultural Intensive (A-N) with irrigated crops and fields. The parcels to the north are part of the incorporated city of Woodland and contain residential homes (Yolo County, 2009). The closest residential homes would be located 530 feet north, 0.37 mile southeast, 0.42 mile south, and 1.5 miles west of the Project site.

There are no designated State Scenic Highways within Yolo County. State Route (SR) 128 and a segment of SR 16 are eligible to be designated as official State “Scenic Highways” (Caltrans, 2019). SR 128 is the nearest eligible State Scenic Highway to the Project, which is located approximately 12.6 miles southwest. The segment of SR 16 eligible to be designated as an official State Scenic Highway is located approximately 14.6 miles northwest from the Project. The Yolo County General Plan designated five routes as local scenic roadways (see Policy CC-1.13, below), all of which are approximately 10 or more miles away (Yolo County, 2018).

Existing Views of the Project. Views of the proposed Project are limited to the residents near the Project and motorists on CR 99. There are no existing buildings or structures within the proposed AT&T Mobility lease area or on the larger Project site. There is an existing diesel tank, well, meter pole, and concrete basin, as well as an existing gravel road in the Project vicinity with an overhead power line, and a power pole with transformer, concrete riser pipe, overhead power line, power pole with transformer, electric meter service pole, aboveground water line, irrigation ditch, and two wells. There are no fences and, and aside from five trees, the site is mostly unvegetated. On-site and adjacent vegetation consists of row and grain crops, idle/fallow agricultural land, barren/unvegetated land, and ruderal/weedy vegetation. The nearest residents to the Project would be approximately 530 feet north.

Viewer Concern and Sensitivity to Visual Change. Viewer concerns regarding the observed landscape are shaped by expectations of what the viewer will experience and by existing conditions. The Project would be located on a privately owned 23.79-acre parcel. The Project elements would be located within a 30-foot by 30-foot (900-square-foot) AT&T Lease Area within this parcel, west of CR 99. The Project would occupy approximately 0.021 acre, or 0.087 percent of the parcel. The Project’s proposed tower and associated equipment would be located adjacent to the existing access road on the parcel, currently used for farming activities. See Figure 4-2, Project Site.

The proposed Project would include the following major built elements: a 140-foot-tall monopole tapered telecommunications tower, installed on a 30-foot by 30-foot cell tower pad area, covered in gravel paving; an 6-foot by 12-foot walk-in cabinet with HVAC unit on a raised concrete slab with a concrete shelter; a 30-kW diesel backup generator on a precast foundation; a utility H-Frame on conic footings for lights, monitoring, and security equipment; and a 6-foot-tall chain link fence with barbed wire and access gate, surrounding the telecommunications site. See Figure 4-3, Site Plan. There would be a temporary disturbance area of approximately 10-foot by 30-foot (300 square feet) adjacent to the cell tower, which would be used for equipment staging and fence installation.

The gravel road, overhead power line, power pole with transformer, and irrigation equipment are existing visual elements of the local landscape. Aside from the nearby residents, there are no other sensitive receptors in the vicinity. The visual change proposed on the Project parcel would be largely viewed from the backyards of nearby residences.

The telecommunications tower would be taller than the existing power poles and all other existing elements on the parcel. The residences to the north of the proposed Project area would have a view of the Project. The closest residents would have a view of the telecommunications tower from their

backyard, looking south. The other residents in the neighborhood, would have a view of the telecommunications tower, which would mostly be screened by the houses adjacent to the Project parcel. From this location, only the top of the tower would be visible (see KOP 2 and 3, in Appendix A, Photo Simulations). The facilities and telecommunications tower would be visible from motorists using CR 99, looking west.

However, the visual elements introduced by the Project in the landscape would be similar in nature to those of the existing landscape such as the power poles located on and around the site.

The Project has taller visual elements than the existing setting. The most visible portion of the proposed Project would be the 140-foot-tall telecommunications tower, which would look somewhat like a power pole, except taller. However, there are several tall visual elements in the Project area. There are five power poles along the west side of CR 99, north of the access road, and several to the south of the access road, extending into the distance.

When viewed from CR 99, the Project parcel is backdropped by agricultural land to the west.

When viewed from CR 99, looking west toward the Project, and from Road 25A, looking north toward the Project, the telecommunications tower is barely visible in the distance.

The visual changes introduced by the proposed Project would be visible to a limited number of people, those living in the nearby residences and motorists on CR 99.

The presence of the tower would not break up views of the existing setting and would be consistent with the current visual character of the site and vicinity, which includes power poles and small equipment used for farming. Due to the Project setting, it would not distract from any visually sensitive views.

Regulatory Background

Yolo County General Plan (County of Yolo 2030 Countywide General Plan), Land Use and Community Character Element. The Yolo County General Plan contains goals and policies meant to preserve the visual and scenic setting in the County. The following goal and policies are applicable to the proposed Project.

- **GOAL CC-1:** Preservation of Rural Character. Ensure that the rural character of the County is protected and enhanced, including the unique and distinct character of the unincorporated communities.
- **Policy CC-1.1:** Encourage private landowners of both residential and commercial properties to maintain their property in a way that contributes to the attractive appearance of Yolo County, while recognizing that many of the land uses in the County, including agriculture and light industry, require a variety of on-site structures, equipment, machinery and vehicles in order to operate effectively.
- **Policy CC-1.8:** Screen visually obtrusive activities and facilities such as infrastructure and utility facilities, storage yards, outdoor parking and display areas, along highways, freeways, roads and trails.
- **Policy CC-1.9:** In communities, place both new and existing line utilities and telecommunications infrastructure underground where feasible. Where underground utilities are not feasible, minimize the aesthetic impact by co-locating new improvements within existing lines and facilities where possible.
- **Policy CC-1.12:** Preserve and enhance the scenic quality of the County's rural roadway system. Prohibit projects and activities that would obscure, detract from, or negatively affect the quality of views from designated scenic roadways or scenic highways.

- **Policy CC-1.13:** The following routes are designated as local scenic roadways, as shown in Figure LU-3 (Scenic Highways):

- State Route 16 (Colusa County line to Capay)
- State Route 128 (Winters to Napa County line)
- County Roads 116 and 116B (Knights Landing to eastern terminus of CR 16)
- County Roads 16 and 117 and Old River Road (CR 107 to West Sacramento)
- South River Road (West Sacramento City Limits to Sacramento County line)

5.1.2. Environmental Impacts

(a) Would the project have a substantial adverse effect on a scenic vista?

NO IMPACT. The flat topography and agricultural/rural residential character of the Project site does not provide scenic vistas, which typically are views of extensive open spaces or views from elevated topographic positions. The Project site is at an elevation of 74 feet. The region that the Project is in is predominantly flat, with some rolling hills located to the west. The nearest area of high elevation that could provide panoramic views, that would include the Project site, is over 15 miles away, and has an elevation of approximately 1,000 feet. At this distance, the Project site would be indiscernible. Therefore, the Project would result in no impact to a scenic vista.

(b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

NO IMPACT. As discussed, there are no designated state scenic highways within Yolo County. There are two “eligible” state scenic highways within Yolo County, which are SR 16 and SR 128, located approximately 14.6 miles northwest, and 12.6 miles southwest of the Project site, respectively (Caltrans, 2018). The Project site is not visible from any eligible or designated scenic highways or historic buildings. The Project site does not contain any rock outcroppings or historic structures, and would not require the removal of any trees. Since the proposed Project is not near any State scenic highways, no impacts to a designated scenic vista would occur.

(c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of the 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?

LESS THAN SIGNIFICANT IMPACT. The Project is located in a rural area in unincorporated Yolo County, adjacent to the City of Woodland. The primary land uses to the east, south, west, and north are agricultural, with residents to the north, beyond an area of irrigated row crops. The Project site is located on a parcel zoned as Agricultural Intensive (A-N). There is an existing gravel access road, dirt road (north of the proposed Project site), irrigation facilities, a diesel tank, overhead power line, power pole with transformer, electric meter service pole, and aboveground water lines just south of the site.

During construction, the presence of equipment and vehicles would be noticeable to motorists on local roads, and from nearby residences. However, construction activities would be temporary and would last approximately 90 to 120 days.

Currently, the portion of the Project site that would be permanently disturbed and occupied by Project features is vacant and covered with row crops.

The current land use designation of the site is Agriculture.

The addition of the telecommunications tower would not be a significant change within the overall landscape, due to the presence of existing industrial elements in the Project vicinity. These include an overhead power line with power poles and an electric meter service pole.

The public views of the Project site are primarily from surrounding roads, with CR 99 being the closest, with its centerline located approximately 1,335 feet east of the project. Motorists traveling north or south on this roadway would have only brief, momentary views of the tower. Additionally, as most vehicles on the roadway are occupied solely by drivers, direct views of the proposed cell tower would be limited (FHA, 2022). Drivers are typically focused on the road ahead, reducing the likelihood of prolonged or direct visual engagement with the structure.

County Roads 25A and 99 are approximately 4,790 feet to the south and 1,335 feet to the east, respectively. Motorists on these roads would be able to see the telecommunications tower in the far distance, as demonstrated in KOPs 1 and 2 (see Appendix A, Photo Simulations). The tower would be taller than the other industrial elements in the area but would not be large enough to significantly stand out. For motorists on any of these roads, the experience with the Project in place would be similar in nature to the existing visual experience.

There would also be public views from the residential neighborhood to the north of the proposed Project. Although residential views are not considered public views, views from public streets, such as Midway Drive (KOP 2) and Paula Way (KOP 3), within the residential neighborhood, would be considered public views, see Appendix A, Photo Simulations. Except for El Paseo Drive, public views of the Project at this location would largely be screened by the houses in the residential community. Additionally, the telecommunications tower would be located adjacent to an existing power pole, and therefore, the Project would be similar in nature to the existing visual experience.

As noted in this section and Section 5.11 (Land Use and Planning), the Yolo County Zoning Ordinance allows communications towers, such as the proposed Project, as a qualified use type in areas zoned A-N, with a Major Use Permit. Therefore, the proposed Project, if approved, would be consistent with applicable zoning, regulations, and the applicable policies of the Yolo County General Plan; thus, the impact would be less than significant.

(d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

LESS THAN SIGNIFICANT IMPACT. Construction activities would occur during daylight hours and would not include nighttime work that would necessitate the use of lighting within work areas. The surfaces of new structures and enclosures would be non-reflective and would not create glare. The tower would have a grey non-metallic finish to blend in with the background sky. Adjacent residential properties also have nighttime streetlights and residential lights.

According to the FAA, any structure over 200 feet should be marked or lighted for aviation safety (FAA, 2025). The proposed Project would not require lighting because the communication tower would be 140 feet tall.

There would be a security light installed on the utility H-Frame, which would be full cut-off, shielded, downward facing, and directed towards the Project site. If additional temporary lighting should be required for nighttime maintenance, portable lighting equipment would be used and removed from the site at the end of the maintenance.

Regarding potential glare impacts, the communication tower would be painted to ensure the tower does not contain any reflective surfaces. All aboveground supporting infrastructure would not be of size, height, or material that could create substantial glare. Therefore, impacts would be less than significant.

5.1.3. Aesthetics Impact Conclusions

No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.2. Agriculture and Forestry Resources

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) pre-pared by the California Department 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:**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.2.1. Setting

Over 93 percent of Yolo County is designated as farmland and open space. There are 603,544 acres of agricultural land in the unincorporated area of Yolo County (Yolo County, 2009). Tomatoes, wine grapes, almonds, organic production, and alfalfa hay are Yolo County's top five commodities based on gross value. Pistachios, sunflower seed, nursery products, apiary, and rice round out the top ten commodities (Yolo County, 2022).

The proposed Project would disturb approximately 0.021 acre (900 square feet) of a 23.79-acre privately-owned agricultural parcel. The proposed Project site is immediately south of Woodland's city border, and west of CR 99 in Yolo County. The property is currently being used for irrigated crop production. Surrounding uses include orchards, dry-farmed crop fields, and irrigated crops fields to the east, south, and west. The closest residences are located on El Paseo Drive and Midway Drive approximately 530 feet north of the site.

The California Department of Conservation (DOC) established the Farmland Mapping and Monitoring Program (FMMP) in 1982 to assess the location, quantity, and quality of agricultural lands and conversion of these lands to other uses. Every even-numbered year, FMMP issues a Farmland Conversion Report. FMMP data are used in elements of some county and city general plans, in regional studies on agricultural

land conversion, and in environmental documents as a way of assessing project-specific impacts on Prime Farmland.

The U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) (formerly Soil Conservation Service), classifies notable agricultural lands as follows:

- **Prime Farmland:** *Land that has the best combination of physical and chemical properties for the production of crops.*
- **Farmland of Statewide Importance:** *Similar to Prime Farmland, but with minor shortcomings (e.g., steeper slopes, inability to hold water).*
- **Unique Farmland:** *Land of lesser quality soils, but recently used for the production of specific high economic value crops. Land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California.*
- **Farmland of Local Importance:** *Defined for Yolo County as farmland, presently cultivated or not, having soils which meet the criteria for Prime or Statewide, except that the land is not presently irrigated, as well as other non-irrigated farmland.*
- **Grazing Land:** *Land on which the existing vegetation is suited to the grazing of livestock.*
- **Urban and Built-Up Land:** *Land occupied by structures with a building density of at least one unit per 1.5 acres. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures and other developed purposes.*
- **Other Land:** *Land not included in any other mapping category, for example, low density rural developments; brush, timber, wetland and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines and borrow pits; water bodies smaller than 40 acres; and vacant and non-agricultural land surrounded on all sides by urban development and greater than 40 acres in area.*
- **Water:** *Perennial water bodies with an area of at least 40 acres.*

The proposed Project site would be located on Prime Farmland under the California Department of Conservation Farmland Mapping and Monitoring Program (DOC, 2023). The Project parcel is zoned as Agricultural Intensive (A-N) and is not enrolled under a Williamson Act Contract (Yolo County, 2025).

Regulatory Background

State Requirements

This section addresses the requirements of California Government Code Section 65560(b) related to agriculture and rangeland: “(b) ‘Amount of land converted from agricultural use’ means those lands that were permanently converted or committed to urban or other nonagricultural uses and were shown as agricultural land on Important Farmland Series maps maintained by the department and in the most recent biennial report.” In addition, it addresses Government Code Section 65560(h)(2), which reads:

“(2) Open space used for the managed production of resources, including, but not limited to, forest lands, rangeland, agricultural lands, and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; bays, estuaries, marshes, rivers, and streams that are important for the management of commercial fisheries; and areas containing major mineral deposits, including those in short supply.”

Local Requirements

The following policies are presented in the Yolo County General Plan, Agriculture and Economic Development Element (Yolo County, 2009a).

- **Goal AG-1:** Preserve and defend agriculture and agricultural lands as fundamental to the identity of Yolo County. This goal focuses on the County's key agricultural sectors, including retaining existing growers and processors of crops, as well as emerging crops and processing, support of small and organic growers, and transfer of new technologies.
- **Policy AG-1.5:** Strongly discourage the conversion of agricultural land for other uses. This policy requires that no lands shall be considered for redesignation from Agricultural or Open Space to another land use designation unless all of three findings are made involving a public need or net community benefit; no feasible alternative locations for the proposed project; and no significant impact on existing or potential agricultural activities.
- **Policy AG-1.6:** Continue to mitigate at a ratio of no less than 1:1 the conversion of farmland and/or the conversion of land designated or zoned for agriculture, to other uses. This policy is implemented using the Agricultural Conservation and Mitigation Program, which is described below.
- **Policy AG-1.14:** Preserve agricultural lands using a variety of programs, including the Williamson Act, Farmland Preservation Zones (implemented through the Williamson Act), conservation easements, an Agricultural Lands Conversion Ordinance, the Agricultural Conservation and Mitigation Program, and the Right-to-Farm Ordinance.

The following goal and policy are presented in the Yolo County General Plan, Land Use and Community Character Element (Yolo County, 2009b).

- **Goal LU-2:** Preserve farmland and expand opportunities for related business and infrastructure to ensure a strong local agricultural economy. This goal is implemented through the programs noted in AG-1.14 above.
- **Policy LU-2.4:** Vigorously conserve, preserve, and enhance the productivity of the agricultural lands in areas outside of adopted community growth boundaries and outside of city spheres of influence. This policy is implemented through adherence to urban growth boundaries designated by Yolo County's incorporated cities, and in conjunction with LAFCO, the cities' spheres of influence.

Yolo County Code, Section 8-2.1102. Wireless Telecommunications Facilities

The Yolo County Code contains the primary land development regulations of the county. Regarding wireless telecommunication facilities, Title 8 (Zoning Code) of the County Code states, "Large wireless telecommunication facilities constructed on parcels less than forty (40) acres, on lands zoned for agricultural, industrial, open space and recreation uses, shall be considered in all cases for approval of a Major Use Permit." (Yolo County, 2023). Construction of a large wireless telecommunication facility may be approved in the A-N zoning district, provided the facility meets all of the development standards set forth in Section 8-2.1102(e), below:

(e) Development standards. The following development standards shall be satisfied prior to the approval of a wireless communications facility:

- (1) The site can provide all necessary infrastructure for the development of the proposed wireless communication facility. The minimum parcel size required for a large telecommunication facility shall be two (2) acres.

- (2) Opportunities to co-locate the subject facility on an existing facility have either been exhausted or are not available in the area.
- (3) The facility as proposed is necessary for the provision of an efficient wireless communication system.
- (4) The development of the proposed wireless communication facility will not significantly affect the existing onsite topography and vegetation; or any designated public viewing area, scenic corridor or any identified environmentally sensitive area or resource. Wireless communication facilities proposed to locate in a designated scenic corridor, including areas identified by the General Plan as providing scenic value, may require stealth design elements to mitigate visual impacts.
- (5) The proposed wireless communication facility will not create a hazard for aircraft in flight and will not hinder aerial spraying operations.
- (6) The applicant agrees to accept proposals from future applicants to co-locate at the approved site.
- (7) The applicant agrees to reserve space and/or provide conduit available for County and emergency communications.

Williamson Act

The Williamson Act, also known as the California Land Conservation Act, is a staple of Yolo County's agricultural preservation program. The main purposes of the Yolo County Williamson Act program are to: preserve farmland to ensure a secure food supply for the state, nation, and future generations; maintain agriculture's contribution to local and state economic health; provide a tax incentive to farmers and ranchers who keep their land in agricultural use through long-term contracts; promote orderly city growth and discourage leapfrog development and the premature loss of farmland; and preserve open space for its scenic, social, aesthetic and wildlife values (Yolo County, 2017).

Yolo County Agricultural Conservation and Mitigation Program

Yolo County established its Agricultural Conservation and Mitigation Program in 2014, by adding a new section to the County Zoning Code (Yolo County Code Section 8-2.404; Yolo County, 2015). This section implements the agricultural land conservation policies contained in the Yolo County General Plan with a program designed to permanently protect agricultural land located within the unincorporated area. Mitigation shall be required for conversion or change from agricultural use to a predominantly non-agricultural use prior to, or concurrent with, approval of a zone change from agricultural to urban zoning, permit, or other discretionary or ministerial approval by the County.

With some exceptions regarding projects proposed near urban area boundaries, for projects that convert prime farmland, a minimum of 3 acres of agricultural land shall be preserved for each acre of agricultural land changed to a predominantly non-agricultural use or zoning classification (3:1 ratio). For projects that convert non-prime farmland, a minimum of 2 acres of agricultural land shall be preserved for each acre of land changed to a predominantly non-agricultural use or zoning classification (2:1 ratio). Projects that convert a mix of prime and non-prime lands are required to use a blended mitigation ratio which reflects the percentage mix of converted prime and non-prime lands within project site boundaries (Yolo County, 2021).

5.2.2. Environmental Impacts

(a) Would the project 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?

LESS THAN SIGNIFICANT IMPACT. The proposed Harlan Ranch Project would occupy approximately 0.021 acre (900 square feet) within a 23.79-acre parcel, which is classified as Prime Farmland. The temporary disturbance would be up to 0.071 acre (3,100 square feet) due to construction equipment and trenching work for the underground fiber optic cable and power line. The Project would convert less than 0.088 percent of the parcel to non-agricultural use.

The primary soil types within the Project site are Yolo silt loam (Ya) (86.4 percent), Brentwood silty clay loam (BrA) (11.4 percent), and the Reiff very fine sandy loam (Ra) (2.2 percent) (USDA, 2023). These three soil types are classified as Prime Farmland soils (DOC, 2022). The developed area would extend across designated Prime Farmland pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency (DOC, 2023).

The Yolo County Code states that “Large wireless telecommunication facilities constructed on parcels less than forty (40) acres, on lands zoned for agricultural, industrial, open space and recreation uses, shall be considered in all cases for approval of a Major Use Permit.” (Yolo County, 2023).

The proposed Project would be considered an agricultural use as defined in Section 8-2.404(b) of the Yolo County Code which includes conditional uses listed on the table of permitted uses in agricultural zones and because it would be implemented in a manner that does not substantially diminish the agricultural productive capacity of the project site.

Soil disturbance would be limited to trenching for installation of underground power and fiber service lines of approximately 200 square feet within a 15-foot-wide utility easement. The area of permanent disturbance would be graveled, and any damage to the existing access roads or other areas of temporary disturbance would be restored to the condition it was in prior to construction.

In summary, the proposed Project would be considered compatible with the A-N zoning of the parcel, given the approval of a Major Use Permit. Additionally, given the size and nature of the temporarily and permanently disturbed area, approximately 0.09 acre, the proposed Project would not diminish the productive capability of the property or neighboring properties, and therefore, would not result in the conversion of prime farmland to non-agricultural use. Impacts to agricultural resources would be less than significant.

(b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

LESS THAN SIGNIFICANT IMPACT. The Project site is zoned Agricultural Intensive (A-N), which permits the siting of large wireless telecommunication facilities on parcels less than 40 acres in size, such as the proposed Project, subject to approval of a Major Use Permit by the Planning Commission.

The Project site is not under a Williamson Act Contract. Therefore, the impact would be less than significant.

(c) Would the project 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))?

NO IMPACT. As stated above, the Project site is zoned A-N. None of the proposed Project activities would occur on land zoned as forest, timberland, or timberland production. The construction, operations and

maintenance of the facility would not conflict with existing zoning of forest, timberland, or timberland production.

(d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

NO IMPACT. See response to (c) above.

(e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

NO IMPACT. As identified in (a), above, the Project site is designated as Prime Farmland by the DOC and is in close proximity to Prime Farmland to the west, south, and east. However, the proposed Project is considered a compatible agricultural use on Prime Farmland, and would not impact the productive capacity of the parcel. The remainder of the subject parcel will continue to be farmed. Further, construction and operation of the Project would not result in the conversion of non-agricultural use of neighboring farmland. Therefore, there would be no impact from the conversion of Farmland to non-agricultural use.

5.2.3. Agriculture and Forestry Services Impact Conclusions

No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.3. Air Quality

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:**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.3.1. Setting

Criteria Pollutants. Air quality is determined by measuring ambient concentrations of criteria pollutants. Air pollutants are those pollutants for which acceptable levels of exposure can be determined and for which standards have been set. The degree of air quality degradation is then compared to the current National and California Ambient Air Quality Standards (NAAQS and CAAQS). Unique meteorological conditions in California and differences of opinion by medical panels established by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (US EPA) cause considerable diversity between state and federal standards currently in effect in California. In general, the CAAQS are more stringent than the corresponding NAAQS. The standards currently in effect in California are shown in Table 5.3-1.

Table 5.3-1: National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards
Ozone	1-hour	0.09 ppm	—
	8-hour	0.070 ppm	0.075 ppm
Respirable Particulate Matter (PM ₁₀)	24-hour	50 µg/m ³	150 µg/m ³
	Annual Mean	20 µg/m ³	—
Fine Particulate Matter (PM _{2.5})	24-hour	—	35 µg/m ³
	Annual Mean	12 µg/m ³	15 µg/m ³
Carbon Monoxide (CO)	1-hour	20 ppm	35 ppm
	8-hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO ₂)	1-hour	0.18 ppm	—
	Annual Mean	0.030 ppm	0.053 ppm
Sulfur Dioxide (SO ₂)	1-hour	0.25 ppm	—
	24-hour	0.04 ppm	0.14 ppm
	3-hour	—	0.5 ppm
	Annual Mean	—	0.03 ppm

Notes: ppm=parts per million; µg/m³= micrograms per cubic meter; "—" = no standard

Source: CARB (<http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>), November, 2008.

Attainment Status and Air Quality Plans. The US EPA, California Air Resource Board (CARB), and the local air district classify an area as attainment, unclassified, or nonattainment. The classification depends on whether the monitored ambient air quality data show compliance, insufficient data available, or non-compliance with the ambient air quality standards, respectively. The proposed Project would be located within Yolo County, in the Sacramento Valley Air Basin, under the jurisdiction of the Yolo-Solano Air Quality Management District (YSAQMD). Table 5.3-2 summarizes attainment status for the criteria pollutants in the YSAQMD jurisdiction with both the federal and state standards.

Table 5.3-2: Attainment Status for Yolo County

Pollutant	Federal Designation	State Designation
Ozone (1 hour)	No Federal Standard	Nonattainment
Ozone (8 hour)	Nonattainment	Nonattainment
PM10	Unclassified	Nonattainment
PM2.5	Nonattainment	Unclassified
CO	Attainment	Attainment
NO2	Attainment	Attainment
SO2	Attainment	Attainment

Source: YSAQMD, 2024a.

As Table 5.3-2 shows, the proposed Project area is currently nonattainment for the state ozone and PM10 standards, and the federal ozone and PM2.5 standards, and attainment or unclassified for all other state and federal standards.

Regulatory Background

Sources of air emissions in the Yolo County portion of the Sacramento Valley Air Basin are regulated by the US EPA, CARB, and YSAQMD. The relevant air quality regulations are under the authority of CARB and YSAQMD. The relevant programs and regulations under each of these two regulatory agencies are discussed below.

State

California Diesel Risk Reduction Plan. CARB has adopted several regulations that are meant to reduce the health risk associated with on- and off-road and stationary diesel engine operation. This plan recommends many control measures with the goal of an 85 percent reduction in diesel particulate matter emissions by 2020. The regulations noted below, which may also serve to significantly reduce other pollutant emissions, are all part of this risk reduction plan.

Emission Standards for On-road and Off-road Diesel Engines. CARB has established emission standards for new on-road and off-road diesel engines. These regulations have model year-based emissions standards for NOx, hydrocarbons, CO, and particulate matter (PM).

In-use Off-road Vehicle Regulation. The State has also enacted a regulation for the reduction of diesel particulate matter and criteria pollutant emissions from in-use off-road diesel-fueled vehicles (CCR Title 13, Article 4.8, Chapter 9, Section 2449). This regulation provides target emission rates for PM and NOx emissions from owners of fleets of diesel-fueled off-road vehicles and applies to off-road equipment fleets of three specific sizes where the target emission rates are reduced over time. Specific regulation requirements include:

- Limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles;
- Requires all vehicles to be reported to the CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled;
- Restricts adding older vehicles into fleets starting on January 1, 2014; and
- Requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits).

The construction contractor(s) who complete the construction activities for this Project would have to comply with the requirements of this regulation.

Heavy Duty Diesel Truck Idling Regulation. This CARB rule became effective February 1, 2005, and prohibits heavy-duty diesel trucks from idling for longer than 5 minutes at a time, unless they are queuing, and provided the queue is located more than 100 feet from any homes or schools.

Statewide Portable Equipment Registration Program (PERP). PERP establishes a uniform program to regulate portable engines and portable engine-driven equipment units. Once registered in the PERP, engines and equipment units may operate throughout California without the need to obtain individual permits from local air districts, if the equipment is located at a single location for no more than 12 months. There may be construction equipment that would be required to be PERP registered, such as portable generators, but there are no known operating emission sources that would be subject to this regulation.

US EPA/CARB Off-Road Mobile Sources Emission Reduction Program. The California Clean Air Act mandates that CARB achieve the maximum degree of emission reductions from all off-road mobile sources in order to attain the state ambient air quality standards. Off-road mobile sources include construction equipment. Tier 1 standards for large compression-ignition engines used in off-road mobile sources went into effect in California in 1996. These standards and ongoing rulemaking jointly address emissions of nitrogen oxides (NOx) and toxic particulate matter from diesel combustion. CARB is also developing a control measure to reduce diesel particulate matter emissions as well as NOx from in-use (existing) off-road diesel equipment throughout the State.

CARB Portable Equipment Registration Program. This program allows owners or operators of portable engines and associated equipment commonly used for construction or farming to register their units under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts.

Local

Sacramento Area Regional Ozone Attainment Plan

The YSAQMD is included in the Sacramento Federal Non-attainment Area (SFNA) by the US EPA. As such, YSAQMD adopted the Sacramento Regional 2015 NAAQS 8-Hour Ozone Attainment & Reasonable Further Progress Plan, which outlines strategies to meet the 8-hour ozone standard. Each of the SFNA air districts adopted the plan in the fall of 2023 and submitted the Plan to the California Air Resources Board (ARB) who submitted it to the US EPA on November 17, 2023, for approval (CARB, 2024).

Yolo-Solano Air Quality Management District Rules and Regulations

The following YSAQMD rules and regulations would apply to the proposed Project:

- Rule 2.3 Ringelmann Chart
- Rule 2.5 Nuisance
- Rule 2.14 Architectural Coatings

These rules apply during construction and operation. Rule 2.3 would specifically apply to fugitive dust emissions during construction and operation. Rule 2.5 would apply to construction operation odors and fugitive dust. Rule 2.14 would apply to the paints and other architectural coatings applied during construction and for facility upkeep during operation. The Project applicant has not identified any stationary sources that would require YSAQMD permitting.

YSAQMD Handbook for Assessing and Mitigating Air Quality Impacts

The YSAQMD recommends that CEQA lead agencies use threshold levels in evaluating the significance of criteria air pollutant emissions from project-related mobile and area sources in the Handbook for

Assessing and Mitigating Air Quality Impacts (YSAQMD, 2007). The guidelines identify quantitative and qualitative long-term significance thresholds for use in evaluating the significance of criteria air pollutant emissions from project-related mobile and area sources.

The air quality thresholds of significance include:

- Reactive organic gases (ROG): 10 tons per year
- Oxides of nitrogen (NOx): 10 tons per year
- Particulate matter (PM10): 80 pounds per day
- Carbon monoxide (CO): Violation of State ambient air quality standard
- Cancer health risk: 10 in a million at maximally exposed individual (MEI)
- Chronic or acute health risk: hazard index (HI) equal or greater than one

The guidelines include recommendations for construction fugitive dust and construction equipment exhaust mitigation strategies, where needed. Common measures for controlling construction dust include watering, chemical stabilization of soils or stockpiles, and reducing surface wind speeds with windbreaks. The guidelines identify feasible measures for controlling dust and list the types of sources of emissions subject to controls (YSAQMD, 2007). The Project would implement these feasible measures as needed to comply with YSAQMD Rule 2.3 and Rule 2.5.

The Project would not be a major transportation project or otherwise have CO emissions sources that would be substantial enough to cause a violation of the ambient air quality standard for CO. Therefore, the Project has no potential to exceed the CO threshold of significance.

Yolo County General Plan

The 2030 Yolo Countywide General Plan and accompanying Climate Action Plan include numerous policies and measures to reduce fossil fuel reliance and greenhouse gas emissions, and improve air quality through county actions. Each measure was evaluated for co-benefits that include improving air quality, improving mobility, improving public health and safety, enhancing the natural environment, enhancing the local or regional economy and/or supports job creation, saving money, promoting equity, and providing education. The following Yolo County General Plan Conservation and Open Space Element policies address air quality, as it relates to the proposed Project (Yolo County, 2009):

- **Policy CO-6.2:** Support local and regional air quality improvement efforts
- **Policy CO-6.6:** Encourage implementation of YSAQMD Best Management Practices, such as those listed below, to reduce emissions and control dust during construction activities:
 - Water all active construction areas at least twice daily.
 - Haul trucks shall maintain at least two feet of freeboard.
 - Cover all trucks hauling soil, sand, and other loose materials.
 - Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut-and-fill operations and hydroseed area.
 - Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
 - Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.
 - Plant vegetative ground cover in disturbed areas as soon as possible.
 - Cover inactive storage piles.
 - Sweep streets if visible soil material is carried out from the construction site.

- Treat accesses to a distance of 100 feet from the paved road with a 6 to 12 inch layer of wood chips or mulch.
- Treat accesses to a distance of 100 feet from the paved road with a 6-inch layer of gravel.

5.3.2. Environmental Impacts

(a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT IMPACT. The Project would not substantially conflict with or obstruct implementation of the Sacramento Area Regional Ozone Attainment Plan, or subsequent updates to this plan for attaining and maintaining ozone ambient air quality standards. Similarly, Project activities would not substantially conflict with or obstruct implementation of strategies to meet PM10 or PM2.5 standards, or the goals and objectives of the County's General Plan. Construction would include short-term activities that would not affect long-term projections for air quality attainment.

Since the proposed Project would include a diesel emergency generator, the applicant would be required to obtain a permit to construct and a permit to operate for the generator. The permit to construct must be submitted prior to construction, and the permit to operate before the generator may be used. Permit applications are located on the YSAQMD website (YSAQMD, 2024b). Additionally, as mentioned in Table 4.2 of the Project Description, the applicant would also be required by CARB to obtain a Portable Equipment Registration or an Air Quality Permit to Operate.

All activities related to the Project's construction would occur in compliance with all applicable state and YSAQMD rules and regulations and thus would not conflict with or obstruct implementation of any air quality management plan.

DURING OPERATION, LESS THAN SIGNIFICANT IMPACT. Project-related on-site operation and maintenance (O&M) activities would contribute a minor quantity of emissions due to site upkeep activities that would occur in compliance with all applicable YSAQMD rules and regulations. The on-site HVAC unit would run when needed, with the possibility of 24-hour continuous running during heat waves. No on-site employees would be needed at the unmanned facility, although a service technician would visit once every 6 to 8 weeks to monitor and perform any necessary maintenance. The standby generator would be operated for approximately 15 minutes per month for maintenance purposes. As stated in the construction impact section, the applicant would be required to obtain the necessary permit to construct and operate the emergency generator. The Project's operation would not conflict with, or obstruct implementation of, any air quality management plan, and the impact under this criterion would be less than significant.

(b) Would the project 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?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT IMPACT. The proposed Project would generate temporary emissions during construction. Table 5.3-3 provides a summary of the proposed Project's overall emissions resulting from the 6-month construction duration for comparison with the YSAQMD thresholds for VOC and NOx.

Table 5.3-3: Project Overall Construction Emissions (tons)

	VOC	NOx	CO	SOx	PM10	PM2.5
Overall Construction Emissions	0.81	0.20	1.37	0.00	0.76	0.09
YSAQMD Significance Thresholds (tons/year)	10	10	N/A	N/A	N/A	N/A
Exceeds Significance Thresholds?	No	No	---	---	---	---

Sources: YSAQMD, 2007; Appendix B, AQ/GHG CalEEMod Outputs.

Table 5.3-4 provides a summary of the proposed Project's maximum daily rate of emissions that result from construction for comparison with the YSAQMD threshold for PM10.

Table 5.3-4: Project Maximum Daily Construction Emissions (lbs/day)

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Construction Emissions	35.33	10.24	61.25	0.03	24.16	3.12
YSAQMD Significance Thresholds (lbs./day)	N/A	N/A	N/A	N/A	80	N/A
Exceeds Significance Thresholds?	---	---	---	---	No	---

Sources: YSAQMD, 2007; Appendix B, AQ/GHG CalEEMod Outputs.

The proposed Project would not create any criteria pollutant emissions during construction and therefore would not exceed YSAQMD emissions significance thresholds. The Project would be located in a non-attainment area for ozone, PM10, and PM2.5. The proposed Project's construction would not contribute significantly to a cumulatively considerable net increase of any criteria pollutants, and this impact would be less than significant.

DURING OPERATION, LESS THAN SIGNIFICANT IMPACT. Project-related on-site O&M activities would contribute a minor quantity of emissions due to routine maintenance that would occur in compliance with all applicable YSAQMD rules and regulations. No on-site employees would be needed to operate the communications tower. The daily and annual emission rates for these operations and maintenance activities would be substantially less than those estimated for the construction phase shown in Table 5.3-4 and are shown in Tables 5.3-6 and 5.3-7.

Table 5.3-5: Project Annual Operation Emissions (tons/yr)

	VOC	NOx	CO	SOx	PM10	PM2.5
Annual Operation Emissions	0.0032	0.0048	0.0051	0.0000	0.0002	0.0002
YSAQMD Significance Thresholds (tons/year)	10	10	N/A	N/A	N/A	N/A
Exceeds Significance Thresholds?	No	No	---	---	---	---

Sources: YSAQMD, 2007; Appendix B, AQ/GHG CalEEMod Outputs.

Table 5.3-5 provides a summary of the proposed Project's maximum daily rate of emissions that result from operation for comparison with the YSAQMD threshold for PM10.

Table 5.3-6: Project Maximum Daily Operation Emissions (lbs/day)

	VOC	NOx	CO	SOx	PM10	PM2.5
Maximum Daily Operation Emissions	0.14	0.79	0.55	0.00	0.03	0.03
YSAQMD Significance Thresholds (lbs./day)	N/A	N/A	N/A	N/A	80	N/A
Exceeds Significance Thresholds?	---	---	---	---	No	---

Sources: YSAQMD, 2007; Appendix B, AQ/GHG CalEEMod Outputs.

The proposed Project would not create any criteria pollutant emissions during operation and therefore would not exceed YSAQMD emissions significance thresholds. The Project would be located in a non-attainment area for ozone, PM10, and PM2.5. Therefore, no mitigation would be necessary beyond the mandatory compliance with applicable rules and regulations. The proposed Project's operation would not

contribute significantly to a cumulatively considerable net increase of any criteria pollutants, and this impact would be less than significant.

(c) Would the project expose sensitive receptors to substantial pollutant concentrations?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT IMPACT. During construction of the Project use of gasoline and diesel fuel by on-site vehicles and equipment would create small quantities of toxic air contaminants, of which diesel particulate matter emissions would be the primary concern. No other sources of toxic air contaminants would occur during Project construction. During construction, on-site equipment and off-site on-road vehicle tailpipe emissions would be dispersed within the site and along the travel routes for the on-road vehicles. Considering the limited nature of construction emissions (within a 90-day duration), the low quantities of emissions potentially generated during construction, and the dispersion of construction-related contaminants within the site and along travel routes, construction emissions would be unlikely to lead to ambient concentrations that could expose any sensitive receptor to incur a cancer risk above 10 in a million or an acute or chronic hazard index of one or more. Therefore, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

DURING OPERATION, LESS THAN SIGNIFICANT IMPACT. Once operational, diesel particulate matter emissions would be limited because the Project would involve no routine use of heavy-duty diesel vehicles or equipment, except as occasionally needed for maintenance or repairs, and the use of a diesel standby generator in times of emergency or maintenance. Therefore, the potential for the Project to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

(d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

DURING CONSTRUCTION, LESS THAN SIGNIFICANT IMPACT. Few sources of objectionable odors would occur as a result of construction activities, which would emit contaminants related to diesel exhaust, dust, and minor quantities of organic compounds. The nearest residence is located approximately 530 feet north of the Project site. Any construction-related odors would only occur for a short time. Therefore, the Project would not generate any odorous emissions in sufficient quantities to impact any considerable number of persons, and this impact would be less than significant.

DURING OPERATION, LESS THAN SIGNIFICANT IMPACT. The proposed Project's operation would not involve consistent use of malodorous substances or activities that would cause significant odors. However, during emergency situations and for routine maintenance, a diesel emergency generator would be used, and would emit contaminants related to diesel exhaust. These would be minor and in limited circumstances. Therefore, the Project's operation would not generate any odorous emissions in sufficient quantities to impact any considerable number of persons, and this impact would be less than significant.

5.3.3. Air Quality Impact Conclusions

The proposed Project would not conflict with or obstruct implementation of any air quality management plans. The proposed Project would also not contribute significantly to a cumulatively considerable net increase of any criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations, or generate any odorous emissions in sufficient quantities to impact any considerable number of persons. No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.4. Biological Resources

BIOLOGICAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.4.1. Setting

This section describes the biological resources that occur in the proposed Project area. It includes a description of the existing biotic environment, including common plants and wildlife, sensitive habitats, special-status species and their locations in relation to the proposed Project.

For this section, the following designations apply:

- **Project area:** Refers to the 30-foot by 30-foot lease area for the monopole cell tower and associated equipment; and 15-foot non-exclusive access and utility easement from CR 99 along the unpaved private driveway to the lease area.
- **Project parcel:** Refers to APN: 039-030-017 in which the entire Project area is situated.
- **Survey Area:** Refers to a 0.25-mile (1,320 feet) buffer adjacent to the lease area and access/utility easement that includes all areas surveyed and considered in summarizing biological resources known or expected to occur. The survey was conducted within private land where access was granted and legally accessible rights-of-way.

The following section (5.4.2) presents an analysis of potential impacts to biological resources and, where necessary, specifies required measures to avoid and minimize potential impacts to less-than-significant levels. Information used in preparing this section was derived from:

- Field survey of the Survey Area conducted on March 18, 2025
- Yolo HCP/NCCP (Yolo Habitat Conservancy, 2018)
- Google Earth® aerial photographs
- California Natural Diversity Data Base (CDFW, 2025)

- eBird (online database of bird observations) (eBird, 2025)
- iNaturalist (online database of plant and animal observations) (iNaturalist, 2025)
- Tricolored blackbird portal (UC Davis, 2025)
- *The 2020 Distribution, Abundance, and Habitat Associations of the Swainson's Hawk (Buteo swainsoni) in Yolo County, California* (Estep, 2020)

In addition to assessing impacts pursuant to CEQA, this section also serves as the Planning Level Survey that is required pursuant to the Yolo HCP/NCCP. The survey was conducted on March 18, 2025, by Krystal Pulsipher of Aspen Environmental Group.

Topography, Climate, and Land Use

The Project area is immediately south of the City of Woodland and approximately 1.9 miles west of I-5. The landscape is generally flat with an elevation of approximately 73 feet above mean sea level with no discernable topographic features. The climate in the vicinity of the Project area consists of warm, dry summers and wet winters. The average high temperature for the region is 75 degrees Fahrenheit (°F) and an average annual minimum temperature of 50°F, and an average annual rainfall of approximately 21 inches (US Climate Data, 2025).

The lease area and part of the access/utility easement of the Project area is within the eastern edge of APN: 039-030-017, an approximately 23.79-acre agricultural parcel (Figure 5.4-1, Land Cover). The access/utility easement begins at the intersection of CR 99 (paved road) and the unpaved private driveway, running west along the unpaved private driveway for approximately 0.25 mile, then turning north along a gravel road for approximately 650 feet to an existing utility pole. The Project area is wholly characterized by agricultural land use, as are the lands immediately adjacent to the west, south, and east. Urban land use within the City of Woodland is directly north of the Project parcel. Per Google Earth® aerial imagery, the Project area and adjacent Survey Area appear to be characterized as the same land uses as are currently present for at least the past 40 years.

Vegetation and Land Cover Types

Figure 5.4-1, Land Cover, displays the land cover types within the Survey Area, as defined by the Yolo Habitat Conservancy (2018) and verified during the field survey. The Project parcel and adjacent fields to the west, southwest, south, and east can be classified as Cultivated Lands Seminatural Community land cover type. The Project parcel and fields to the west and east are currently characterized as bare agricultural fields as they are almost entirely devoid of vegetation, containing scattered areas of sparse herbaceous vegetation and furrows prepared for seeding. Remnant bits of corn cobs were observed within and/or adjacent to the previously described fields. The field to the southwest appears to be fallowed, characterized by mixture of vegetation approximately 3 feet tall or shorter. The field to the south contains an unidentified type of grain crop.

In between the Project parcel field and the field to the west is a dirt road and the South Fork Ditch, collectively classified as Semiagricultural/Incidental to Agricultural land cover type. The channel of this agricultural ditch is mostly earthen and was almost entirely devoid of vegetation, lacking surface water but containing saturated soils in the bed of the channel. In between the Project parcel and the fields to the south and east are dirt and gravel roads. A gravel fire road, also used as a foot path, is between the north side of the Project parcel and an urban residential neighborhood. The gravel roads and residential neighborhood are classified as Urban or Built Up land cover types, while the dirt roads are classified as Semiagricultural/Incidental to Agriculture type. Additional fields (Cultivated Lands Seminatural Community), roads and farmsteads (Seminatural/Incidental to Agriculture), and disturbed vacant land

(Urban or Built Up) land cover types are present further east and southeast within the 0.25-mile Study Area.

The Project site and parcel, and adjacent fields, do not contain any trees or shrubs. Some ornamental and volunteer trees and shrubs are present along the urban residential fence line and within the neighborhood to the north. Multiple tall trees are also present to the southeast, associated with the farmsteads and vacant land along CR 99.

Special-Status Plants and Animals

The Project area supports very limited suitable habitat for special-status species. No special-status plants occur, or are expected to occur. Potentially occurring special-status wildlife are those that are known to use agricultural and ruderal habitats and are listed in Table 5.4-1.

Table 5.4-1: Special-Status Species that Could Occur in the Survey Area

Species	Status	Habitat	Occurrence in Survey Area
Plants			
None	-----	-----	-----
Invertebrates			
None	-----	-----	-----
Amphibians			
None	-----	-----	-----
Reptiles			
None	-----	-----	-----
Birds			
Tricolored blackbird (<i>Agelaius tricolor</i>)	ST, SSC	Nests in dense marsh/riparian veg and silage/grain fields; forages in grasslands/farmlands/wetlands	Likely – foraging Possible - nesting
Burrowing Owl (<i>Athene cunicularia</i>)	SSC	Grasslands, field edges	Possible – foraging Unlikely - nesting
Swainson's hawk (<i>Buteo swainsoni</i>)	ST	Nests in trees, hunts in grasslands and farmlands	Likely – foraging Possible - nesting
Northern harrier (<i>Circus hudsonius</i>)	SSC	Grasslands, pastures, fields, seasonal wetlands	Likely – foraging Unlikely - nesting
White-tailed kite (<i>Elanus leucurus</i>)	FP	Nests in trees, hunts in grasslands/farmlands/wetlands	Likely – foraging Possible - nesting
Mammals			
None	-----	-----	-----

Definitions Regarding Potential Occurrence:

Present: Species or sign of its presence observed on the site

Likely: Species or sign not observed on the site, but reasonably certain to occur on the site

Possible: Species or sign not observed on the site, but conditions suitable for occurrence

Unlikely: Species or sign not observed on the site, conditions marginal for occurrence

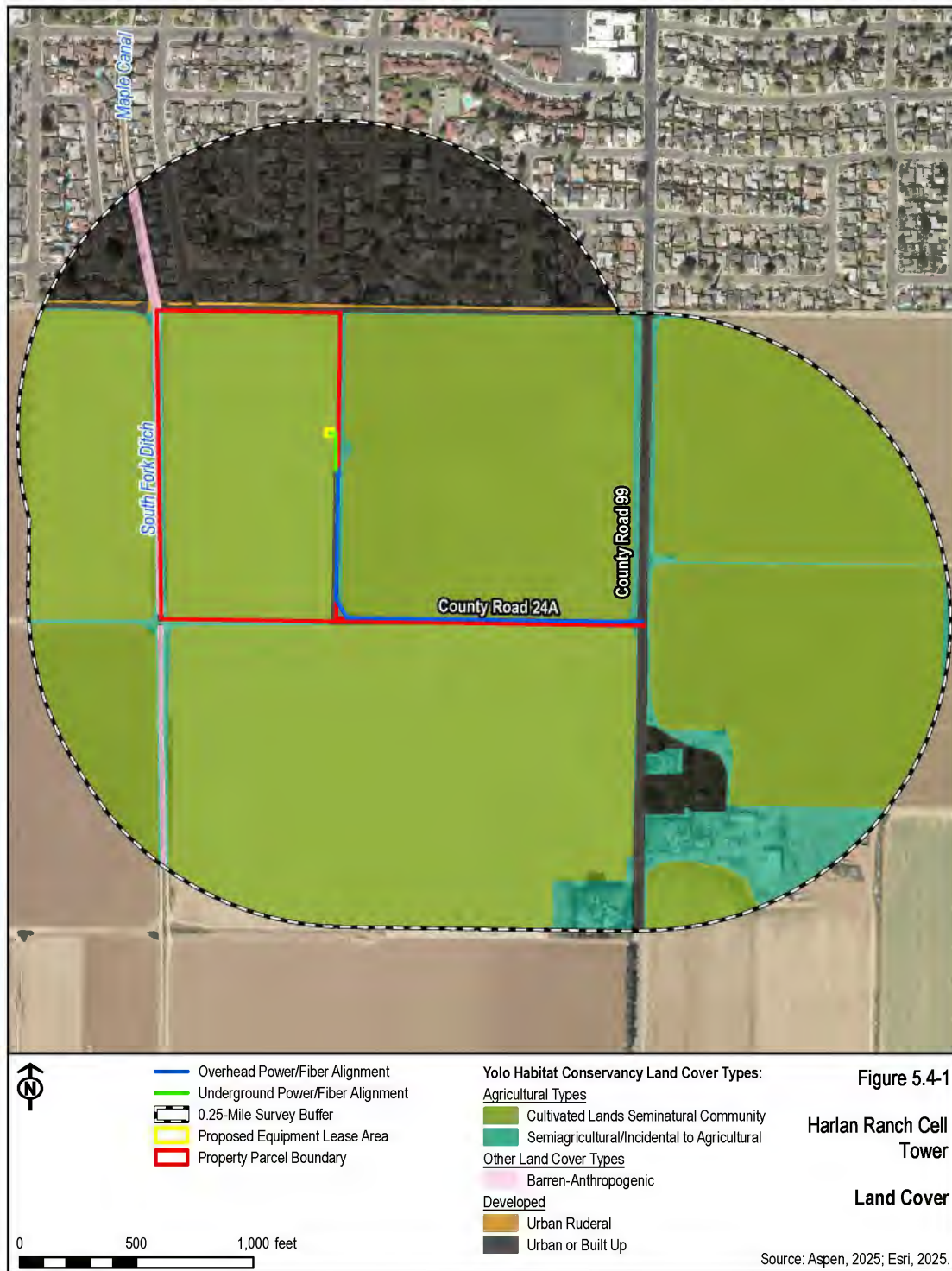
Absent: Species or sign not observed on the site, conditions unsuitable for occurrence

STATUS CODES:

ST State Threatened

SSC California Species of Special Concern

FP Fully Protected

Figure 5.4-1: Land Cover

Aquatic Resources

No aquatic resources were observed within the Project area.

Two isolated, human excavated, agricultural ditches run parallel to each other approximately 10 feet north of the existing gravel road of the proposed access/utility easement, along the east side of the agricultural field between the Project parcel field and CR 99. Neither ditch contained vegetation but contained standing water. Both features are relatively small, being approximately 2 to 3 feet wide bank-to-bank and 0.5 to 1 foot deep at that level. The ditches are not hydrologically connected to other aquatic resources and would hold water on an ephemeral basis during the irrigation of the adjacent field or from stormwater sheet flow from the field and CR 99.

A named ditch, South Fork Ditch, runs adjacent to the western border of the Project parcel, approximately 700 feet west of the Project area. South Fork Ditch is human excavated. The ditch is almost entirely unvegetated and did not contain surface water. This feature measures approximately 15 feet wide bank-to-bank 6 feet deep at that level. South Fork Ditch is part of a larger system of ditches and canals including Moore Canal approximately 3.4 miles northwest of the Project area.

Regulatory Background

In addition to CEQA, the Project is subject to the requirements and provisions of the Yolo HCP/NCCP. The Yolo HCP/NCCP is a comprehensive, county-wide plan to provide for the conservation of state- and federally listed and other sensitive species and the natural communities and agricultural land on which they depend, as well as a streamlined permitting process to address the effects of a range of future anticipated activities on covered species. The Yolo Habitat Conservancy, which consists of Yolo County and the incorporated cities of Davis, West Sacramento, Winters, and Woodland, developed the Yolo HCP/NCCP, which provides the basis for issuance of long-term permits under the Federal Endangered Species Act (FESA) and California Natural Community Conservation Planning Act (NCCPA) that cover an array of public and private activities, including activities that are essential to the ongoing viability of Yolo County's agricultural and urban economies. Specifically, the Yolo HCP/NCCP provides the Permittees (i.e., Yolo County, the four incorporated cities, and the Conservancy) with incidental take permits from both the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) for the 12 sensitive species covered by the plan. This action is pursuant to Section 10(a)(1)(B) of the FESA and Section 2835 of the NCCPA chapter of the California Fish and Game Code (Fish & Game Code). The Yolo HCP/NCCP ensures compliance with the FESA, NCCPA, and the California Endangered Species Act (CESA) for covered activities that may affect the covered species.

Projects within the boundaries of the Yolo HCP/NCCP that are eligible for coverage are required to comply with Avoidance and Minimization Measures (AMMs) to protect identified sensitive species and natural communities. Seven AMMs (five general and two species-specific) were identified as applicable for this project and shall be required in the conditions of approval. The five general AMMs include:

AMM 3. Confine and Delineate Work Areas. Where natural communities and covered species habitat are present, workers will confine land clearing to the minimum area necessary to facilitate construction activities. Workers will restrict movement of heavy equipment to and from the project site to established roadways to minimize natural community and covered species habitat disturbance. The project proponent will clearly identify boundaries of work areas using temporary fencing or equivalent and will identify areas designated as environmentally sensitive. All construction vehicles, other equipment, and personnel will avoid these designated areas.

AMM 5. Control Fugitive Dust. Workers will minimize the spread of dust from work sites to natural communities or covered species habitats on adjacent lands.

AMM 6. Conduct Worker Training. All construction personnel will participate in a worker environmental training program approved/authorized by the Conservancy and administered by a qualified biologist. The training will provide education regarding sensitive natural communities and covered species and their habitats, the need to avoid adverse effects, state and federal protection, and the legal implications of violating the FESA and NCCPA Permits. A pre-recorded video presentation by a qualified biologist shown to construction personnel may fulfill the training requirement.

AMM 7. Control Nighttime Lighting of Project Construction Sites. Workers will direct all lights for nighttime lighting of project construction sites into the project construction area and minimize the lighting of natural habitat areas adjacent to the project construction area.

AMM 8. Avoid and Minimize Effects of Construction Staging Areas and Temporary Work Areas. Project proponents should locate construction staging and other temporary work areas for covered activities in areas that will ultimately be a part of the permanent project development footprint. If construction staging and other temporary work areas must be located outside of permanent project footprints, they will be located either in areas that do not support habitat for covered species or are easily restored to prior or improved ecological functions (e.g., grassland and agricultural land).

Construction staging and other temporary work areas located outside of project footprints will be sited in areas that avoid adverse effects on the following:

Serpentine, valley oak woodland, alkali prairie, vernal pool complex, valley foothill riparian, and fresh emergent wetland land cover types.

Occupied western burrowing owl burrows.

Nest sites for covered bird species and all raptors, including noncovered raptors, during the breeding season.

Project proponents will follow specific AMMs for sensitive natural communities (Section 4.3.3, Sensitive Natural Communities) and covered species (Section 4.3.4, Covered Species) in temporary staging and work areas. For establishment of temporary work areas outside of the project footprint, project proponents will conduct surveys to determine if any of the biological resources listed above are present.

Within one year following removal of land cover, project proponents will restore temporary work and staging areas to a condition equal to or greater than the covered species habitat function of the affected habitat. Restoration of vegetation in temporary work and staging areas will use clean, native seed mixes approved by the Conservancy that are free of noxious plant species seeds.

Additionally, due to the presence of tricolored blackbird, Swainson's hawk, and white-tailed kite nesting and foraging habitat in the wider area, implementation of the following AMMs are required as follows:

Tricolored Blackbird: In compliance with AMM21 of the Yolo HCP/NCCP, a preconstruction survey will be conducted within 1,300 feet of the Project area to determine presence/absence of active nesting colonies. If no active nesting colonies are present, no further mitigation is required for the construction phase. If active nesting colonies are present, a resource protection buffer will be established for active nesting colonies within 1,300 feet during construction and

maintenance activities occurring within the breeding season (approximately March 1 to July 30). Alternatively, if it appears the active nesting colony(ies) is in a location that suggests the birds are tolerant of disturbances, a variance of AMM21 can be sought through coordination with the Yolo Habitat Conservancy.

AMM21, Minimize Take and Adverse Effects on Habitat of Tricolored Blackbird. The project proponent will retain a qualified biologist to identify and quantify (in acres) tricolored blackbird nesting and foraging habitat (as defined in the Yolo HCP/NCCP's Appendix A, *Covered Species Accounts*) within 1,300 feet of the project footprint. If a 1,300-foot resource protection buffer from nesting habitat cannot be maintained, the qualified biologist will check records maintained by the Conservancy (which will include California Natural Diversity Database data, and data from the tricolored blackbird portal) to determine if tricolored blackbird nesting colonies have been active in or within 1,300 feet of the project footprint during the previous 5 years. If there are no records of nesting tricolored blackbirds on the site, the qualified biologist will conduct visual surveys to determine if an active colony is present, during the period from March 1 to July 30, consistent with protocol described by Kelsey (2008).

Operations and maintenance activities or other temporary activities that do not remove nesting habitat and occur outside the nesting season (March 1 to July 30) do not need to conduct planning or construction surveys or implement any additional avoidance measures.

If an active tricolored blackbird colony is present or has been present within the last 5 years within the planning-level survey area, the project proponent will design the project to avoid adverse effects within 1,300 feet of the colony site(s), unless a shorter distance is approved by the Conservancy, USFWS, and CDFW. If a shorter distance is approved, the project proponent will still maintain a 1,300-foot resource protection buffer around active nesting colonies during the nesting season but may apply the approved lesser distance outside the nesting season. Adjacent parcels under different land ownership will be surveyed only if access is granted or if the parcels are visible from authorized areas.

Swainson's Hawk and White-tailed Kite: In compliance with AMM 16 of the Yolo HCP/NCCP, a preconstruction survey will be conducted within 1,320 feet of the Project site to determine the presence/absence of active nests. If no active nests are present, no further mitigation is required. If active nests are present, a resource protection buffer will be established for active nests within 1,320 feet for the remainder of the breeding season (through approximately August 1). Alternatively, if it appears the active nest is in a location that suggests the birds are tolerant of disturbances, a variance of AMM16 can be sought through coordination with the Yolo Habitat Conservancy.

AMM 16. Minimize Take and Adverse Effects on Habitat of Swainson's Hawk and White-Tailed Kite. The proponent will retain a qualified biologist to conduct planning-level surveys and identify any nesting habitat present within 1,320 feet of the project footprint. Adjacent parcels under different land ownership will be surveyed only if access is granted or if the parcels are visible from authorized areas.

If a construction project cannot avoid potential nest trees (as determined by the qualified biologist) by 1,320 feet, the project proponent will retain a qualified biologist to conduct preconstruction surveys for active nests consistent, with guidelines provided by the Swainson's Hawk Technical Advisory Committee (2000) within 15 days prior to the beginning of the construction activity. The results of the survey will be submitted to the Conservancy and CDFW. If active nests are found during preconstruction surveys, a 1,320-foot initial

temporary nest disturbance buffer shall be established. If project related activities within the temporary nest disturbance buffer are determined to be necessary during the nesting season, then the qualified biologist will monitor the nest and will, along with the project proponent, consult with CDFW to determine the best course of action necessary to avoid nest abandonment or take of individuals. Work may be allowed only to proceed within the temporary nest disturbance buffer if Swainson's hawk or white-tailed kite are not exhibiting agitated behavior, such as defensive flights at intruders, getting up from a brooding position, or flying off the nest, and only with the agreement of CDFW and USFWS. The designated on-site biologist/monitor shall be on-site daily while construction-related activities are taking place within the 1,320-foot buffer and shall have the authority to stop work if raptors are exhibiting agitated behavior.

5.4.2. Environmental Impacts

- (a) **Would the project 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?**

Special-Status Plants

NO IMPACT. The Project site is a disturbed area in an active agricultural operation and no special-status plant species exist on the site.

Special-Status Wildlife

LESS THAN SIGNIFICANT IMPACT.

Disturbance to Active Tricolored Blackbird nests. Tricolored blackbirds are known to nest in the region, primarily in the Yolo Bypass Area to the east and southeast, along various sloughs to the south, and along Cache Creek to the northwest. The nearest reported nest is approximately 3.7 miles northeast of the Project area to the northeast of Woodland. The Project area and adjacent Survey Area do not provide freshwater marsh nesting habitat; however, depending upon seasonal crop rotation and crop type, the agricultural fields at, and adjacent to, the Project area could provide suitable nesting habitat if silage and/or grain crops are cultivated. Currently, the Project area does not contain occupied cultivated fields. The fields adjacent to the south and southwest provide a grain crop and fallowed vegetation, respectively, that could potentially support nesting tricolored blackbirds. No tricolored blackbirds were observed during the survey. This species is covered in the Yolo HCP/NCCP and subject to its provisions. As discussed in the regulatory background of this section, the Project is required to comply with HCP/NCCP AMMs to prevent impacts to protected species, which prevents the risk of disturbance to active nests. Because the AMMs are required by regulations, they are a component of the Project that prevent significant impacts to nests.

Disturbance to Active Swainson's Hawk or White-tailed Kite nests. Swainson's hawks are known to nest in the vicinity of the Project area. The nearest reported nest is approximately 0.8 mile northwest of the Project area and there are 12 reported nests within 2 miles of the Project site (Estep, 2020; CDFW, 2025). White-tailed kites are known to nest in the region. The nearest reported white-tailed kite nest is approximately 4 miles southeast of the Project area (CDFW, 2025). The Project area does not provide suitable nest trees. Some of the trees present in the Survey Area along the urban residential fence line approximately 600 feet north of the proposed lease area, and within the neighborhood further to the north, could support nesting raptors such as Swainson's hawk and white-tailed kite. The multiple tall trees associated with the farmsteads and vacant land approximately 500 feet southeast of the eastern end of

the proposed access/utility easement could also support nesting raptors such as Swainson's hawk and white-tailed kite. No raptor nests, Swainson's hawks, or white-tailed kites were observed during the survey. Both species are also Covered Species in the Yolo HCP/NCCP and subject to its provisions. As discussed in the regulatory background of this section, the Project is required to comply with HCP/NCCP Avoidance and Minimization Measures to prevent impacts to protected species, which prevents the risk of disturbance to active nests. Because the AMMs are required by regulations, they are a component of the Project that prevent significant impacts to nests.

Removal of Foraging Habitat for Tricolored Blackbird, Swainson's Hawk, Northern Harrier, and White-tailed Kite. The proposed Project is anticipated to permanently impact approximately 900 square feet of Cultivated Lands Seminal Community land cover type considered suitable as foraging habitat depending upon the season and crop type. However, the amount of foraging habitat proposed for conversion is negligible and not expected to affect foraging opportunities for these species and, therefore, is considered a less-than-significant impact. The Swainson's hawk and white-tailed kite are Covered Species pursuant to the Yolo HCP/NCCP, which ordinarily requires land cover fees depending on the dimensions and configuration of the Project and whether or not land classified as agricultural will be permanently or temporarily removed. However, in this case the Project currently occurs entirely within the disturbed, uncultivated area surrounding the tower site, so no land cover fee would be required. As discussed in the regulatory background of this section, the Project is required to comply with HCP/NCCP AMMs to prevent potential impacts to Covered Species' foraging habitat.

Disturbance to Active Burrowing Owl burrows. The Project area does not contain habitat that could potentially support nesting or winter-roosting burrowing owls. The area immediately adjacent to the existing utility pole to the east of the proposed lease area contains burrowing activity indicative of pocket gopher (*Thomomys bottae*); however, the burrow holes present are not of suitable size to support burrowing owls. The adjacent Survey Area contains very limited marginally suitable habitat for burrowing owl. No burrowing owls or their sign were observed during the survey. Although the burrowing owl is a Covered Species in the Yolo HCP/NCCP, no AMMs are required. The impact to burrowing owls is considered less than significant.

(b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

NO IMPACT. No riparian habitat or other sensitive natural communities would be affected by the proposed Project.

(c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) either individually or in combination with the known or probable impacts of other activities through direct removal, filling, hydrological interruption, or other means?

NO IMPACT. There are no wetlands or other aquatic habitats on, or immediately adjacent to, the Project area that could potentially fall under the jurisdiction of the US Army Corps of Engineers, Regional Water Quality Control Board, or California Department of Fish and Wildlife.

(d) Would the project 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 wildlife nursery sites?

NO IMPACT. The proposed Project would not interfere with the movement of any wildlife species or with established wildlife corridors or impede the use of wildlife nursery sites.

(e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

NO IMPACT. The proposed Project would not conflict with any local policies or ordinances protecting biological resources.

(f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Compliance with the Yolo HCP/NCCP

LESS THAN SIGNIFICANT IMPACT. The project is subject to the requirements and provisions of the Yolo HCP/NCCP, including all applicable AMMs including, as discussed in this section's regulatory background: AMM 3 Confine and Delineate Work Areas, AMM 5 Control Fugitive Dust, AMM 6 Conduct Worker Training, AMM 7 Control Nighttime Lighting of Project Construction Sites, AMM 8 Avoid and Minimize Effects of Construction Staging Areas and Temporary Work Areas, AMM 16 Minimize Take and Adverse Effects on Habitat of Swainson's Hawk and White-Tailed Kite, and AMM 21 Minimize Take and Adverse Effects on Habitat of Tricolored Blackbird. This consistency results in a less than significant impact.

5.4.3. Biological Resources Impact Conclusions

No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.5. Cultural Resources

CULTURAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.5.1. Setting

Approach to Analysis of Cultural Resources and Previous Cultural Resources Studies

This section describes the existing cultural resources in the Project area and discusses potential impacts associated with the proposed Project. Cultural resources are historic and prehistoric archaeological sites, historic-aged architectural or engineering features and structures, and places of traditional cultural significance to Native Americans and other ethnic groups. The following information is pulled from the technical study written for this Project (see Appendix C, Cultural Resources Assessment Report) unless otherwise referenced.

Precontact Background

Paleoindian Period (11,500–4,500 years before present [BP]). The occurrence of Clovis Points in the Central Valley suggests habitation by humans in excess of 10,000 years ago. Evidence for early human use is likely deeply buried by alluvial sediments that accumulated rapidly during the Holocene epoch. Archaeological remains from this early period, though rare, have been found in and around the Central Valley, although to date none have been identified in Yolo County.

Archaeological remains have been grouped chronologically into complexes, the earliest of which is the Farmington Complex. This complex is characterized by core tools and large, reworked percussion flakes.

The precontact background of the Sacramento Valley has been described in terms of general modes of life characterized by technology, particular artifacts, economic systems, trade, burial practices, and other aspects of culture. Three general patterns of resource use for the period between 4500 years before present (B.P.) and the contact period include the Windmill, Berkeley, and Augustine patterns.

The Windmill Pattern (4500 B.P.–2500 B.P.) shows evidence of a mixed economy that relied on the procurement of game and plant foods. The archaeological record contains numerous projectile points and a wide range of faunal remains. Fishing was also important.

Berkeley Pattern (2500 B.P.–1500 B.P.). The Windmill Pattern ultimately changed to a more specialized adaptation termed the Berkeley Pattern (2500 B.P.–1500 B.P.). A reduction in the number of handstones and millingstones and an increase in mortars and pestles is inferred to indicate a greater dependence on acorns. Although gathered plant resources gained importance during this period, the continued presence of projectile points and atlatls (spear-throwers) in the archaeological record indicates that hunting was still an important activity.

Augustine Pattern (500 Current Era (CE) to Contact). The Berkeley Pattern was superseded by the Augustine Pattern around 500 CE. The Augustine Pattern reflects a change in subsistence and land use patterns to those of the ethnographically known people (Patwin, Plains Miwok) of the historic era. This pattern exhibits a great elaboration of ceremonial and social organization, including the development of social stratification. Exchange became well developed, with an even more intensive emphasis on the use of the acorn, as evidenced by shaped mortars and pestles and numerous hopper mortars. Other notable elements of the Augustine Pattern's artifact assemblage include flanged tubular smoking pipes, harpoons, clamshell disc beads, and an especially elaborate baked clay industry, which included figurines and pottery vessels (Cosumnes Brownware).

The presence of small projectile point types, referred to as the Gunther Barbed series, indicates the use of the bow and arrow. Other traits associated with the Augustine Pattern include the introduction of pre-interment burning of offerings in a grave pit during mortuary rituals, increasingly sedentary villages, population growth, and an incipient monetary economy in which beads were used as a standard of exchange.

Ethnography

Yolo County includes portions of the territories of two Native American groups: the Patwin and, to a lesser extent, the Plains Miwok. The western hills and mountains of the County and the lower grassland plains and oak groves were inhabited by the Hill Patwin, while the banks of the Sacramento River and associated riparian and tule marshland habitats were inhabited by the River or Valley Patwin. The Plains Miwok used this area as well.

The material culture and settlement-subsistence practices of the Patwin and the Plains Miwok share similar traits, likely because of historical relationships and an often-shared natural environment. Historical maps and accounts of early travelers to the Sacramento Valley testify that tule marshes, open grasslands, and occasional oak groves characterized the lower elevations near the Sacramento River and Delta. This part of the County was inundated in the winter and exceedingly dry in summer. Because of this, much of the floodplain was sparsely inhabited and Native Americans typically situated their larger, permanent settlements on higher ground along the Sacramento River. Hill Patwin tribelets lived in inter-montane valleys on the eastern side of the North Coast Range, their populations concentrating in particularly dense numbers along Cache and Putah creeks.

Colonial and Post Colonial History

This review of the Project area's regional and local post-colonial history can be organized into three significant cultural themes: the Spanish Era (1769 to 1821), the Mexican Period (1821-1847), and the American Period (1847 to present).

Spanish Period (A.D. 1769–1821). Spanish exploration of Alta (upper) California between 1529 and 1769 was limited. The spring of 1769 marks the true beginning of Spanish settlement, with the establishment by Gaspar de Portolá at San Diego of the first of 21 missions to be built along the California coast by the Spanish and the Franciscan Order between 1769 and 1823. In the fall of 1769, Portolá reached San Francisco Bay. Later expeditions by Pedro Fages in 1772 and Juan Bautista De Anza in 1776 explored the land east of San Francisco Bay and into the vast plains to the east.

The first expedition into the Sacramento Valley was led by Spanish Lieutenant Gabriel Moraga in 1808. Scouting for new mission locations while also searching for runaway Native American neophytes from the coastal missions, they traveled south as far as the Merced River and explored parts of the American, Calaveras, Cosumnes, Feather, Mokelumne, Sacramento, and Stanislaus rivers to the north. Luis Arguello led the final Spanish expedition into the interior of Alta California in 1817. They traveled up the

Sacramento River, past today's City of Sacramento, to the mouth of the Feather River, before returning to the coast.

Mexican Period (A.D. 1821–1847). After Mexico gained independence from Spain in 1822, the mission lands were secularized under the Secularization Act of 1833, but much of the land was transferred to political appointees. A series of large land grants (ranchos) that transferred mission properties to private ownership were awarded by the various governors of California. Land grants were also awarded in the interior to encourage settlement away from the coastal areas that were colonized during the Spanish Period. Captain John Sutter received the two largest land grants in the Sacramento Valley. In 1839, Sutter founded a trading and agricultural empire called *New Helvetia*, which was headquartered at Sutter's Fort near the divergence of the Sacramento and American rivers, in Valley Nisenan territory.

The Mexican Period also marks the exploration by American fur trappers west of the Sierra Nevada Mountains. Jedediah Smith was the first trapper to enter California; his small party trapped and explored along the Sierra Nevada in 1826 and then entered the Sacramento Valley in 1827. They traveled along the American and Cosumnes rivers and camped near the Rosemont section of modern-day Sacramento and Wilton. The explorations by Smith and other trappers resulted in the creation, and then circulation, of maps of the Sacramento Valley in the 1830s.

American Period (A.D. 1847–Present). The Mexican American War followed on the heels of the Bear Flag Revolt of June 1846. General Andrés Pico and John C. Frémont signed the Articles of Capitulation in December 1847, and with the signing of Treaty of Guadalupe Hidalgo in February 1848, hostilities ended and Mexico relinquished California to the United States. In addition to California, under the treaty Mexico also ceded the lands of present-day New Mexico and Texas to the U.S. for \$15 million (Fogelson 1993). Within two years following the treaty, California applied for admission to the Union as a state.

Gold was discovered in 1848 on the American River at Sutter's Mill near Coloma. One year later, nearly 90,000 people had journeyed to the gold fields of California. California became the 31st state in 1850, and three years later the population of the state exceeded 300,000. In 1854, Sacramento became the state capital. Thousands of new settlers and immigrants poured into the state after the transcontinental railroad was completed in 1869, spurring California's economic growth. The fertile soils in the vast Central Valley combined with the rise in the number of irrigation canals promoted the state's role as a national leader in agricultural production.

Woodland History. In 1850, the area where the city of Woodland now stands was a dense grove of oak trees on high ground. Henry Wyckoff settled there in 1853 and opened a small store that he named "Yolo City," which was purchased in 1857 by Major Frank S. Freeman. Maj. Freeman fostered the growth of the community by offering free acreage lots to those who would clear the land and build homes in the area. The city was renamed Woodland and built its first U.S. Post Office in 1861, becoming the Yolo County seat the following year. In addition to being located on high ground safe from the regular flooding of Cache Creek and the Sacramento River, Woodland was also near the intersection of three major roads: two running north-south along the west side of the Central Valley, and the other running east to Sacramento. This location, and the arrival of the railroad in 1869, drove the commerce of Woodland as a business hub for the surrounding farmland.

Woodland was formally incorporated in 1871. Now connected to the rest of the country by railroad and telegraph, the citizens soon enjoyed modern conveniences like gas, electricity, running water, telephones, streetlights and graveled streets. A building boom took place between 1873 and 1899, with many new homes as well as businesses, schools, churches, an opera house, and multiple banks to handle the bustling commerce in the area. In 1888, Woodland was named the richest town in the U.S. in proportion to its population; the city's wealth was reflected in its continued growth and construction of new buildings. Sadly, in 1892, a fire broke out in the city's Chinatown and consumed a large section of Main Street,

including the opera house and a block of nearby homes. The Panic of 1893 caused a nationwide depression that affected every aspect of the American economy, and rebuilding efforts were hampered. But Main Street recovered and was finally rebuilt in 1896, including a new brick opera house.

The chamber of commerce was formed in 1900 to encourage further growth. Women of the community were active in these efforts too, resulting in the creation of a library, city park and public cemetery. By 1910 it was the largest city in Yolo County. Woodland grew steadily throughout the 20th century with new homes, businesses, and industries, particularly farming-related industries like rice mills, processing plants and canneries. Between 1950 and 1980 the city tripled in population, and currently both the city and its surrounding area are experiencing a continued expansion of residential units and businesses.

Record Search

Aspen submitted a California Historical Resources Information System (CHRIS) record search request for the Project to the Northwest Information Center (NWIC) at Sonoma State University requesting data within 0.25 mile of the Project area. On April 8, 2025, the results were received which identified three previously recorded resources within the surrounding 0.25-mile buffer and no cultural resources within the Project area itself (Table 5.5-1). These three resources are historic irrigation ditches. Additionally, the record search did not identify any previous cultural resources studies within 0.25-mile of the Project area.

Table 5.5-1. Cultural Resources Within 0.25-Mile of Project Area

Primary No.	Trinomial	Age	Description	Recording Events
P-57-001063	N/A	Historic	Irrigation Canals	Krull, 2015
P-57-001065	N/A	Historic	Irrigation Canals	Krull, 2015
P-57-001066	N/A	Historic	Irrigation Canals	Krull, 2015

Native American Heritage Commission Sacred Lands File Search

A search of the Sacred Lands File database from the Native American Heritage Commission (NAHC), located in Sacramento, California, was conducted. The record search of the NAHC Sacred Lands File was completed with negative results (i.e., no records were found). Assembly Bill 52, regarding Native American consultation, is discussed in Section 5.18 (Tribal Cultural Resources).

Survey Methods and Results

On April 10, 2025, Aspen's cultural resources specialist, Michael Hoke, RPA, conducted an intensive archaeological survey of the Project area using transects spaced 10 meters apart, oriented in a north-to-south direction. This survey encompassed the area of the 30-foot by 30-foot pad and the utility easement and access route. Additionally, the 30-foot by 30-foot pad area was carefully examined by walking transects at a 2-meter spacing. Mr. Hoke is qualified under the Secretary of the Interior's Qualification Standards and Guidelines for Archaeology and has in-depth familiarity with the prehistoric and historic period cultural resources of Yolo County.

For precontact resources, the surveyor examined the ground surface searching visually for evidence that would suggest the presence of Native American deposits. Such evidence would typically include lithic fragments of economically important stone materials for cutting and hunting tools, stone tools used for grinding/pounding plants or animals (e.g., metates, manos, pestles, bedrock milling surfaces), evidence of rock art, and remains of dietary materials that may have been consumed in the past (e.g., fragments of

bone). The ground surfaces surveyed were also inspected for elements of historic uses, including barbed wire fencing, standing or fallen wooden posts, structural remains of buildings, cairns, wells, prospects, and metal or tin debris (e.g., tin cans, abandoned machinery or vehicles).

A systematic pedestrian survey of the Project area was conducted to identify potential cultural resources. No precontact artifacts or features, nor any historic period artifacts or features, were identified during the survey. Ground visibility was excellent throughout the survey area, with 100 percent visibility observed, except within actively planted agricultural fields where visibility was limited (about 90 percent).

The soils observed in the Project area primarily consisted of gray clayey silt with occasional pebbles, approximately 1 to 2 inches in diameter, indicative of imported fill gravel. The access route for the Project follows the southern boundary and consists of a graded and graveled road. From there, the Project area extends north along a parallel graded road before turning east into an active agricultural field. The proposed 30-foot by 30-foot tower site is also located within this cultivated field.

No evidence of cultural resources, either Native American or historic in age, was identified within the Project boundaries during the pedestrian survey. Based on these results, no known cultural resources are anticipated to be impacted by the proposed Project.

Regulatory Background

State

State of California CEQA Guidelines. State of California CEQA Guidelines require that historical resources and unique archaeological resources be taken into consideration during the CEQA planning process (CEQA Guidelines §15064.5; PRC §21083.2). If feasible, adverse effects to the significance of historical resources must be avoided or the effects mitigated (CEQA Guidelines §15064.5(b)(4)). State CEQA Guidelines require that all feasible mitigation be undertaken even if the prescribed mitigation does not mitigate impacts to a less than significant level (California Office of Historic Preservation (OHP) 2001b:6).

The term that CEQA uses for significant cultural resources is “historical resource,” which is defined as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing, in the California Register of Historical Resources (California Register); (2) listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project’s lead agency (PRC Section 21084.1 and State CEQA Guidelines §15064.5(a)). A historical resource consists of:

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.... Generally, a resource shall be considered by the lead agency to be ‘historically significant’ if the resource meets the criteria for listing on the California Register of Historical Resources

CEQA Guidelines Section 15064.5(a)(3). In accordance with CEQA Guidelines Section 15064.5(b), a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a significant effect on the environment.

CEQA requires a lead agency to determine if an archaeological resource meets the definition of a historical resource, a unique archaeological resource, or neither (CEQA Guidelines §15064.5(c)). Prior to considering potential impacts, the lead agency must determine whether an archaeological resource meets the definition of a historical resource in CEQA Guidelines §15064.5(c)(1). If the archaeological resource meets

the definition of a historical resource, then it is treated like any other type of historical resource in accordance with CEQA Guidelines §15126.4. If the archaeological resource does not meet the definition of a historical resource, then the lead agency determines whether it meets the definition of a unique archaeological resource as defined in CEQA Statutes §21083.2(g). In practice, most archaeological sites that meet the definition of a unique archaeological resource also meet the definition of a historical resource. If the archaeological resource meets the definition of a unique archaeological resource, then it must be treated in accordance with CEQA Statutes §21083.2. If the archaeological resource does not meet the definition of a historical resource or a unique archaeological resource, then effects to the resource are not considered significant effects on the environment (CEQA Guidelines §15064.5(c)(4)).

California Health and Safety Code Section 7050.5. California HSC Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the County Coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Public Resources Code Section 5097.5. PRC Section 5097.5 provides for the protection of cultural resources. This PRC section prohibits the removal, destruction, injury, or defacement of archaeological features on any lands under the jurisdiction of State or local authorities.

California Register of Historical Resources Criteria of Evaluation. The State of California Historical Resources Commission has designed the California Register for use by State and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The California Register is the authoritative guide to the State's significant historical and archaeological resources.

The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance, identifies historical resources for state and local planning purposes, determines eligibility for State historic preservation grant funding, and affords certain protections under CEQA. The following criteria are used when determining if a particular resource has architectural, historical, archaeological, or cultural significance.

- **Criterion 1:** Is the resource associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States?
- **Criterion 2:** Is the resource associated with the lives of persons important to local, California, or national history?
- **Criterion 3:** Does the resource embody the distinctive characteristics of a type, period, region, method of construction, or represent the work of a master or possesses high artistic values?
- **Criterion 4:** Has the resource yielded, or have the potential to yield, information important to the prehistory or history of the local area, California, or the nation?

Local

Yolo County General Plan 2030

Action CO-A65. Require that when cultural resources (including non-tribal archeological and paleontological artifacts, as well as human remains) are encountered during site preparation or construction, all work within the vicinity of the discovery is immediately halted and the area protected

from further disturbance. The project applicant shall immediately notify the County Coroner and the Planning and Public Works Department. Where human remains are determined to be Native American, the project applicant shall consult with the Native American Heritage Commission (NAHC) to determine the person most likely descended from the deceased. The applicant shall confer with the descendant to determine appropriate treatment for the human remains, consistent with State law.

5.5.2. Environmental Impacts

(a) Would the project cause a substantial adverse change in the significance of an historical resource pursuant to §15064.5 [§15064.5 generally defines historical resource under CEQA]?

LESS THAN SIGNIFICANT IMPACT. No known prehistoric or historic aged resources have been identified as being present at or in the immediate vicinity of the Project area. The Project includes limited trenching in a previously-disturbed area to connect the tower to nearby electricity. In the unlikely event unidentified historical resources existing below the ground surface are discovered during ground disturbing work, the County's standard permit conditions require that the applicant immediately stop work and notify a County building inspection official. Therefore, potential impacts to historic resources are less than significant.

(b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

LESS THAN SIGNIFICANT IMPACT. No known archaeological resources have been identified as being present at, or in the immediate vicinity of, the Project area. The Project includes limited trenching in a previously-disturbed area to connect the tower to nearby electricity. In the unlikely event unidentified archaeological resources existing below the ground surface are discovered during ground disturbing work, the County's standard permit conditions require that the applicant immediately stop work and notify a County Building Inspection Official. In the unlikely event that archaeological or tribal cultural resources are inadvertently discovered, Yolo County includes the General Plan Implementation Action CO-A65 discussed above as a standard condition of approval for the project. Therefore, the potential impact to archaeological resources are less than significant.

(c) Would the project disturb any human remains, including those interred outside of formal cemeteries?

LESS THAN SIGNIFICANT IMPACT. There is no indication that human remains are present within the Project area. Background archival research failed to find any potential for human remains (e.g., existence of formal cemeteries) in the area. The limited nature of the proposed ground disturbance makes it unlikely that human remains would be unearthed during construction. In the unlikely event that human remains are inadvertently discovered, Yolo County includes the General Plan Implementation Action CO-A65 discussed previously as a standard condition of approval for the project, including a stop work and contacting the County Coroner and the Building Inspection official. Therefore, the proposed project would result in a less-than-significant impact.

5.5.3. Cultural Resources Impact Conclusions

No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.6. Energy

ENERGY		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.6.1. Environmental Setting

The County has increased its non-residential electricity use 2.52 percent from 1,176 million kWh in the year 2018 to 1,206 million kWh in 2022, ranking the County as 26th in total consumption in the State (CEC, 2025). The County sources its power from fuels including fossil fuels, natural gas, hydroelectric facilities, solar energy, hydrogen fuel, and biofuels. Although there are no hydroelectric facilities within the county, the Yolo County Flood Control and Water Conservation District operates two hydroelectric plants both of which are located in Lake County. The nearest electrical transmission line to the Project site is a 60 kV line located east of the site along CR 99 and runs north-south through the city of Woodland, connecting to another 60 kV line running east-west which connects Woodland to the community of Madison and the greater electrical grid network (PG&E, 2024a). The nearest natural gas pipeline is located along the western edge of the city of Woodland, running south along CR 98 from I-5, and terminating just south of West Main Street, approximately 1.5 miles north of the Project site (PG&E, 2024b).

Valley Clean Energy Alliance (VCE), formed in June 2018, is the Community Choice Aggregators (CCA) Joint Powers Authority that procures energy for customers in the cities of Davis, Woodland, and unincorporated Yolo County. Like all CCAs, VCE is an “opt out” program. Residents and businesses within its service area are automatically enrolled in VCE but have the option to opt out of the program and return to PG&E for generation service at any time. The power provided by VCE is delivered with a PG&E distribution system, which customers pay for. VCE is able to pool the electricity demands of its service area, purchase power from local renewable energy sources, and resell that electricity within its service area. It is VCE’s intent to purchase more electricity from clean energy sources than PG&E at prices that remain at or below PG&E’s rates (Yolo County, 2024b).

The existing site is 23.79 acres within irrigated crop fields on flat farmland. There are no existing buildings or structures within the proposed AT&T Mobility lease area for the Project site. Given the nature of the Project, the sources of energy that would be most relevant are electricity for the operation of the new tower and transportation fuel for vehicle trips associated with Project construction and operation.

Regulatory Background

Yolo County General Plan

Within the state of California, Title 24, Part 6 of the California Code of Regulations sets forth the energy efficiency standards for residential and non-residential buildings. Title 24 requirements address a wide range of design and energy performance features of development, including insulation; the use of energy-efficient heating, ventilation and air conditioning equipment; solar reflective roofing materials; and energy-efficient indoor and outdoor lighting systems.

In Yolo County, energy conservation is achieved via reductions in electricity usage and private automobile use, encouraging efficient siting and exposure for buildings, and implementing land use and transportation policies that encourage fewer and shorter vehicle trips. The following Yolo County General Plan Conservation and Open Space Element policies address energy conservation, as it relates to the proposed Project (Yolo County, 2009):

- **Policy CO-7.3:** Requires all projects to incorporate energy-conserving design, construction, and operation techniques and features into all aspects of the project including buildings, roofs, pavement, and landscaping.
- **Policy CO-7.6:** Encourage the use of building materials and methods that increase energy efficiency a minimum of 15 percent beyond State Title-24 standards for residential buildings and 20 percent beyond State Title 24 standards for commercial buildings.

5.6.2. Environmental Impacts

(a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

LESS THAN SIGNIFICANT IMPACT. The construction of AT&T's new wireless telecommunications facility to expand AT&T's network in the County would use fossil fuels to provide energy for the construction equipment required for the transportation of materials, minor access road improvements, development of a 900-square-foot cell tower pad, construction, and tower installation. The energy required for construction would be temporary, and cease upon completion of the tower, with construction scheduled for approximately 90 days.

The Lead Agency must determine what constitutes a significant impact. There are no established thresholds of significance, statewide or locally, for what constitutes a wasteful, inefficient, and unnecessary consumption of energy for a proposed land use. For the purposes of this analysis, the amount of fuel necessary for Project construction is calculated and compared to that consumed in Yolo County.

As indicated in Section 5.3, the Project is anticipated to generate a total of 57 MTCO_{2e} (metric tons of carbon dioxide equivalent). According to the U.S.EPA, there are 10,180 grams of CO₂ per gallon of diesel (US EPA, 2024). Therefore, by dividing 57 by 10.18e-3, the Project would consume a total of 5,600 gallons of diesel during the duration of construction activities.

The County consumed a total of 41 million therms of energy from non-residential fuel sources in the year 2022, which is equivalent to approximately 29.23 million gallons of diesel. The Project's projected consumption of 5,600 gallons of diesel, approximately 0.019 percent of the County's non-residential fuel consumption, would not constitute a waste, inefficient, or unnecessary consumption of energy.

Construction equipment fleet turnover and increasingly stringent state and federal regulations on engine efficiency combined with state regulations limiting engine idling times and required recycling of construction debris, would further reduce the amount of transportation fuel demand during Project construction.

Existing utilities are located northeast of the site. The Project proposes to install approximately 200 feet of underground power and 2,400 feet of fiber service lines. Once construction is complete, the facility would only require energy for the operation of the tower. Operation of the Project would not generate any fuel consumption because it would not be contributing to any mobile sources, beyond the site visit by a single technician once every six to eight weeks. As such, fuel consumption associated with vehicle trips generated by the Project during operation would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

Operations of the proposed Project would not result in the consumption of natural gas, and thus, would not contribute to the County-wide usage. The cell tower equipment and the single security light would be

the only noticeable source of permanent increase in energy consumption of the Project. The proposed Marvair SlimPac Environmental Control HVAC unit would run on an as-needed basis, depending upon the ambient temperature, and has an energy efficiency rating of 9.3 (Industrial Climate Engineering, 2018). The 30-kW standby diesel generator selected for installation would only operate in the event of an emergency power outage, and for approximately 10 to 15 minutes per month for routine maintenance, making its contribution to the County's overall energy consumption negligible. Compliance with Title 24 of the California Code of Regulations would ensure the Project would meet the state requirements for energy efficiency and would not result in wasteful, inefficient, or unnecessary consumption of energy resources that could result in potentially significant environmental impacts.

(b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

NO IMPACT. The Project would require energy for the construction, operation, and maintenance of the proposed cell tower facility. As discussed in section (a) above, the energy consumption would be minimal, and the increase in energy from the facility would be negligible when compared to the overall energy usage of the County. The Project would comply with the energy efficiency standards set forth in the state and local regulations, such as Title 24 and the Yolo County General Plan. Policy CO-7.3 of the Conservation and Open Space Element of the General Plan requires all projects to incorporate energy-conserving design, construction, and operation techniques into all aspects of the Project. AT&T Mobility would construct the cell tower in the most energy-efficient manner using the most energy-conserving materials. All tower equipment proposed, including the HVAC system and security lighting onsite would meet energy rating standards of Title 24. Activities and components of the proposed telecommunication tower would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

5.6.3. Energy Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.7. Geology and Soils

GEOLOGY AND SOILS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Be located on geologic units 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Geology and Soils question (d) reflects the current 2016 California Building Code (CBC), which is based on the International Building Code (2015), effective January 1, 2017. The CBC is updated every three years. Significance criteria established by CEQA Guidelines, Appendix G.

5.7.1. Setting

Regional Geologic Setting

Yolo County is situated in the Sacramento Valley, between the Coast Mountain range to the west and Sierra Nevada Mountain range to the east. The Northern Inner Coast Range mountains and foothills runs along the western and northern parts of the county, including the Dunnigan Hills outcropping near the project site. The county is predominately covered in alluvium deposited during the Pliocene and Quaternary geologic periods. The Pliocene-age Tehama formation spread out along the lower flanks of the east-facing foothills, Capay Valley, Dunnigan Hills, and along the low hills of the Plainfield Ridge (Yolo County, 2005). Course alluvial sediments, known as the Red Bluff formation, deposited and eroded Tehama surfaces in the Quaternary age. Coast range foothill creeks, Cache and Putah creeks, and flood basin deposits from the Sacramento River distributed Quaternary alluvium to the low-lying areas of Yolo County (Yolo County, 2005). The resulting soil composition created prime agricultural farmland.

Local Geology

The Project parcel is in unincorporated Yolo County, in an area of flat farmland and borders the south city limit of Woodland. Land uses surrounding the Project consist of agricultural and residential homes at the

city boundary. The Project site is located approximately 5.8 miles southeast of Dunnigan Hills, which contains a Late Quaternary fault.

Soils

Soil surveys for Yolo County conducted by the US Department of Agriculture, Soil Conservation Service identified general soil types found in the County. Yolo County hosts an array of soil types that benefit the widespread agriculture throughout the County. Soils within the proposed Project area reflect the underlying rock type, the extent of weathering of the rock, the degree of slope, and the degree of human modification. The proposed Project site is characterized by the soils in Table 5.7-1, Soils in the Project Disturbance Area. The Project site is entirely on Yolo silt loam soil (USDA, 2025).

Table 5.7-1: Soils in the Project Disturbance Area

Name	Type	Percent Slope	Drainage	Percent of Parcel
Ya – Yolo silt loam	Silt loam	0 - 2	Well Drained	100%

1 - USDA NRCS Representative Soil Features

Slope Stability

Landslides are a risk associated with seismic activity, weak materials, stream and coastal erosion, and heavy rainfall. A landslide is the natural process of rapid downslope movement of soil, rock, and rock debris as a mass. The risk and rate of landslides are affected by the type and extent of vegetation, slope angle, degree of water saturation, strength of the rocks, and the mass and thickness of the deposit. The primary risk area for landslides and mudslides in Yolo County is Capay Valley, about 14.6 miles west of the Project site, due to the poorly consolidated marine sediments located on either side of the rapidly moving Cache Creek. Land and mudslides are not a serious risk in other portions of the County (Yolo County, 2009b). The Project site is located on flat land with elevation ranging between 70 and 85 feet above sea level within a 1-mile radius, in an area of low landslide susceptibility (USGS, 2025). There are irrigated crop fields to the east, south, west, and north, with residential homes to the north of the Project site, beyond an irrigated crop field.

Seismicity

Seismic faults can be classified as historically active, active, potentially active, or inactive, based on the following criteria (CGS, 2007):

- Faults that have generated earthquakes accompanied by surface rupture during historic time (approximately the last 200 years) and faults that exhibit a seismic fault creep are defined as Historically Active.
- Faults that show geologic evidence of movement within Holocene time (approximately the last 11,000 years) are defined as Active.
- Faults that show geologic evidence of movement during the Quaternary time (approximately the last 1.6 million years) are defined as Potentially Active.
- Faults that show direct geologic evidence of inactivity during all of Quaternary time or longer are classified as Inactive.

Yolo County has Holocene, Quaternary, and Pre-Quaternary faults within its borders (Yolo County, 2009b). The Hunting Creek Fault and the Dunnigan Hills Fault are the two main faults identified in the 2030 Countywide General Plan. The Dunnigan Fault is located approximately 5.8 miles northwest of the Project site and is considered potentially active but not considered by the California Geological Survey (CGS) as likely to generate surface rupture (Yolo County, 2009c). The Hunting Creek-Berryessa fault

system, located about 31 miles northwest of the Project site and extending through Napa and Lake counties, is a Holocene fault in a sparsely populated area of the County (DOC, 2015). The Hunting Creek Fault is the only fault in the County subject to surface rupture. Yolo County has a low probability for earthquake hazards, but it is subject to seismic activity both within and near the County. Major faults in the Coast Ranges and Sierra Nevada foothills are capable of producing earthquakes that could affect Yolo County Residents (Yolo County, 2009b).

Paleontology

The best available geologic mapping for the Project area is the Sacramento 30' by 60' Quadrangle at a scale of 1:100,000 (DOC, 2011). This mapping shows the Project site lies in Quaternary Holocene alluvium. These nonmarine alluvial plain and fluvial deposits could have higher potential for paleontological resources at depth but have low potential for paleontological resources at the 3-foot depth of trenching for the Project's power and fiber optic lines.

The Red Bluff Formation is a Pleistocene-age thin pediment cover composed of bright red sandy gravel (Helley and Jaworowski, 1985). The Red Bluff is deformed by the Dunnigan Hills anticline, and it unconformably overlies the Tehama Formation south of Woodland and in intermittent patches between Winters and the mouth of Cache Creek (Helley and Harwood, 1985). The Red Bluff Formation can be assigned a moderate potential for paleontological resources due to the scarce occurrence of vertebrate fossils in this geologic unit (SDNHM, 2020). Geologic mapping by Olmsted and Davis shows the Project site does not overly the Red Bluff Formation, with the closest extent near Dunnigan Hills (more than 5 miles away) and east of the Sacramento River (more than 15 miles away) (1961).

According to a Paleontological Resource Technical Report by the San Diego Natural History Museum, the Tehama Formation is a non-marine sedimentary formation of Pliocene age (5.3 to 2.6 million years) that has produced numerous and diverse land mammal fossils in Yolo County (2020). The most common fossils are isolated teeth and foot bones of horse, fish, turtle, tortoise, shrew, gopher, pack rat, deer mouse, dog, coyote, peccary, deer, mastodon, and ground sloth (SDNHM, 2020). While the Tehama Formation has a high potential for paleontological resources, the Project site does not overly it, as evidenced by the geologic mapping shown in the Sacramento 30' by 60' Quadrangle and by Olmsted and Davis (DOC, 2011).

Regulatory Background

Federal

Earthquake Hazards Reduction Act. Congress authorized the National Earthquake Hazards Reduction Program (NEHRP) in 1977 after passing the Earthquake Hazards Reduction Act (Public Law 95-124). The purpose of the NEHRP is to "reduce the risks of life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program." The program's goals are to develop and implement effective practices and policies for earthquake loss reduction, improve techniques for reducing earthquake vulnerabilities of facilities and systems, improve earthquake hazards identification and risk assessment methods, and improve the understanding of earthquakes and their effects. The National Institute of Standards and Technology (NIST) serves as the lead agency of the program, and coordinates with key federal agencies including the Federal Emergency Management Agency (FEMA), National Science Foundation (NSF), and United States Geological Survey (USGS) (NEHRP, 2021).

Clean Water Act. The Clean Water Act (CWA) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of waters of the U.S. (WOUS). The CWA established the National Pollutant Discharge Elimination System (NPDES) permit program to regulate point-source

discharges of pollutants into WOUS for construction activities that disturb one or more acres. The NPDES Program is a federal program that has been delegated to the State of California for implementation through the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCB). The SWRCB and RWQCBs grant NPDES permits and set waste discharge requirements for stormwater runoff from construction sites through NPDES Construction General Permits. The proposed Project would not need to acquire a Construction General Permit, because the Project would not result in over one acre of disturbance. To prevent impacts related to stormwater, an erosion control plan would be implemented, which will designate BMPs designed to avoid or eliminate pollution discharges into waters of the U.S.

State

Alquist-Priolo Earthquake Fault Zoning Act. The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act. The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards.

California Building Code. The California Building Code (CBC) prescribes standards for constructing safer buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions, such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every 3 years and is based on the International Building Code; the current version is the 2019 CBC.

Local

County of Yolo. The Yolo County Code of Ordinances Section 10-3.404 and 10-4.410 state that in cases of in-channel material removal and off-channel surface mining, all resource records shall be checked for the presence of or potential for prehistoric and historic sites, paleontological resources, and unique geologic features. Damaging effects on cultural resources shall be avoided whenever possible, and if avoidance is not feasible a mitigation plan shall be prepared and implemented (Yolo County Code of Ordinances, 2024). The Code also regulates the use, stockpile, removal, ripping, dispersal, and sampling, testing, and monitoring of soil, in addition to dust and erosion control in Title 6 and Title 10.

The Yolo County 2030 General Plan Health and Safety Element assesses the geologic and seismic hazards for the county and lists policies to protect the public and reduce damage to property from such hazards. The Health and Safety Element of the Yolo County 2030 General Plan contains the following policies relevant to geological resources (Yolo County, 2009b).

- **Policy HS-1.1:** Regulate land development to avoid unreasonable exposure to geologic hazards.

- **Policy HS-1.2:** All development and construction proposals shall be reviewed by the County to ensure conformance to applicable building standards.
- **Policy HS-1.3:** Require environmental documents prepared in connection with CEQA to address seismic safety issues and to provide adequate mitigation for existing and potential hazards identified.

Action CO-A63 of the Conservation and Open Space Element of the Yolo County 2030 General Plan (Yolo County, 2009a) requires cultural resources inventories of all new development projects in areas where a preliminary site survey indicates a medium or high potential for archaeological, historical, or paleontological resources. In addition, it requires a mitigation plan to protect the resource before the issuance of permits. Mitigation may include:

- Having a qualified paleontologist present during initial trenching;
- Redesign of the project to avoid paleontological resources;
- Capping the site with a layer of fill; and/or
- Excavation and removal of the paleontological resources and curation in an appropriate facility under the direction of a qualified professional. (Policy CO-4.1, Policy CO-4.13)

Action CO-A65 of the Conservation and Open Space Element requires that when paleontological artifacts are encountered during site preparation or construction, all work within the vicinity of the discovery is immediately halted and the area protected from further disturbance.

5.7.2. Environmental Impacts

(a) Would the project 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.**

LESS THAN SIGNIFICANT IMPACT. The Project is not located within an Alquist-Priolo Earthquake Fault Zone (DOC, 2024a). The closest potentially active fault, the Dunnigan Hills Fault, is located 5.8 miles northwest of the Project site. The fault has been active in the last 10,000 years but has not been active in historic times (Yolo County, 2009b). Yolo County has a low probability for earthquake hazards, but there is potential for the site to experience ground shaking due to earthquake activity from faults in Napa and Lake counties or from the Sierra Nevada and Coastal ranges (Yolo County, 2009b). The Project site is surrounded by flat farmland to the east, south, west, and north. The nearest residential home is within the City of Woodland and is approximately 530 feet to the north, beyond an irrigated row crop field. The Project would be designed and engineered in accordance with Uniform Building Code requirements to mitigate potential impacts and ensure they would be less than significant to people or residences near the cell tower during any seismic activity. Therefore, potential impacts would be less than significant.

- ii. **Strong seismic ground shaking?**

LESS THAN SIGNIFICANT IMPACT. Potential earthquake damage on the Project site would likely occur from ground shaking and seismically related structural failures. The degree of this type of hazard is controlled by the nature of the underlying soil and rock materials, the magnitude of and distance from the quake, the duration of ground motion and the physical characteristics of the affected structure. Seismically induced shaking and some damage would be expected to occur during a major event, but damage would be no more severe in the Project area than elsewhere in the region. The telecommunications tower Project would be designed, engineered, and built in accordance with Uniform Building Code requirements to mitigate potential impacts and ensure they would be less than significant to people and residences near the cell tower during any seismic event. Therefore, potential impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

LESS THAN SIGNIFICANT IMPACT. The Project site has not been evaluated by the United States Geological Survey (USGS) for liquefaction susceptibility (DOC, 2025). However, the risk for liquefaction is expected to be higher in the Great Valley portion of Yolo County, particularly along floodplains where the sediments are sandier (Yolo County, 2009b). The proposed Project does not require surface grading for the foundation. Therefore, potential impacts would be less than significant.

iv. Landslides?

LESS THAN SIGNIFICANT IMPACT. The proposed Project site is subject to Low Landslide Susceptibility (Yolo County, 2009b). The Ya soil type that the tower would be built upon is well drained, limiting the risk of a landslide. Additionally, the location of the tower pad and access road improvements would not be on a slope, further limiting the risk. The Project site is located on flat land with elevation of 74 feet above mean sea level, with no discernible topographic features, with elevations ranging between 70 feet to 85 feet in a 1-mile radius (USGS, 2025). Therefore, the impact would be less than significant.

(b) Would the project result in substantial soil erosion or the loss of topsoil?

LESS THAN SIGNIFICANT IMPACT. The Project would not require any grading for the construction of the cell tower or access road improvements. Temporary disturbance, due to the installation of the underground fiber optic cable and underground power line, would be up to 0.021 acre (900 square feet). To minimize potential impacts related to soil erosion and soil loss, an erosion control plan would be included as a standard condition of approval. Construction would be subject to the requirements of the erosion control plan, thereby ensuring that potential impacts would be less than significant.

(c) Would the project be located on geologic units 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?

LESS THAN SIGNIFICANT IMPACT. The Project is not located in an area of unstable geologic materials. Furthermore, the Project is not expected to significantly affect the stability of the underlying materials, which could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Construction of the Project would not create a significant risk to people or structures from an unstable geologic unit or unstable soil.

(d) Would the project 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?

LESS THAN SIGNIFICANT IMPACT. The USDA Web Soil Survey identifies the expansiveness of the Ya soil type, indicated by both the linear extensibility rating and plasticity index rating, on the Project site (Yolo silt loam) as “normal” (USDA, 2025b; 2025c). The Project will be constructed in accordance with the Uniform Building Code requirements. If a geotechnical investigation is needed as part of the building permit process, the final Project design will incorporate any design recommendations. Therefore, construction of the Project would have a less than significant impact direct or indirect risks to life or property.

(e) Would the project 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?

NO IMPACT. As indicated in Section 4.12, *Operations and Maintenance*, the telecommunications tower would not be staffed. An AT&T service technician would visit the site once every 6 to 8 weeks to check the facility and perform any necessary maintenance. The standby generator (for use during emergency power outages) would be operated for approximately 10 to 15 minutes per month for maintenance purposes. Testing and maintenance would take place weekdays between 8:00 a.m. and 6:00 p.m. The generator has a capacity of 190 gallons, and no additional fuel will be stored on-site. Wastewater would not be

generated during construction, operation, or maintenance of the tower. Therefore, a wastewater system or septic tank would not be required for the Project.

(f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

LESS THAN SIGNIFICANT IMPACT. According to the Preliminary Geologic Map of the Sacramento 30' x 60' Quadrangle, the Project site is located on Quaternary Holocene alluvium, which has low potential for paleontological resources (DOC, 2011). The map shows that the Project site does not overly the Tehama Formation, which has high potential for paleontological resources (DOC, 2011). Geologic mapping by Olmsted and Davis shows the Project site does not overly the Red Bluff Formation, which has a moderate potential for paleontological resources (1961). Therefore, any trenching activities would be into Quaternary Holocene alluvium and have a less than significant impact on unique paleontological resources or unique geologic features.

5.7.3. Geology and Soils Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.8. Greenhouse Gas Emissions

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.8.1. Setting

The global climate depends on the presence of naturally occurring greenhouse gas (GHG) to provide what is commonly known as the “greenhouse effect” that allows heat radiated from the Earth’s surface to warm the atmosphere. The greenhouse effect is driven mainly by water vapor, aerosols, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and other constituents. Globally, the presence of GHG affects temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity. Human activity directly contributes to emissions of the anthropogenic GHGs, including CO₂, primarily from the use of fossil fuels as a source of energy.

Effects of GHG Emissions. Changing temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity provide indicators and evidence of the effects of climate change. From 1950 onward, relatively comprehensive data sets of observations are available. Research by California’s Office of Environmental Health Hazard Assessment (OEHHA) documents climate change indicators by categorizing the effects as: changes in California’s climate; impacts to physical systems including oceans, lakes, rivers, and snowpack; and impacts to biological systems including humans, vegetation, and wildlife. The primary observed changes in California’s climate include increased annual average air temperatures, more-frequent extremely hot days and nights, and increased severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snowmelt runoff, shrinking glaciers, and rising sea levels. Impacts to terrestrial, marine, and freshwater biological systems, with resulting changes in habitat, agriculture, and food supply are occurring in conjunction with the potential to impact human well-being (OEHHA, 2018).

California GHG Emissions Trends. California first formalized a strategy to achieve GHG reductions in 2008, when California produced approximately 484 million metric tons of CO₂ equivalent (MMTCO₂e) according to the official California Air Resources Board (CARB) inventory (CARB, 2020). The State’s economy-wide emissions have been declining in recent years. California’s sources of GHG emitted approximately 371 MMTCO₂e in 2022 (CARB, 2024), less than 6 percent of the U.S. GHG emissions total for 2022 of 6,343 MMTCO₂e (US EPA, 2024).

Regulatory Background

State

California Global Warming Solutions Act of 2006 [Assembly Bill 32 (AB 32)]. The California Global Warming Solutions Act of 2006 (AB 32) required that California’s GHG emissions be reduced to 1990 levels by 2020. The ARB Climate Change Scoping Plan, initially approved December 2008 and most-recently updated by ARB in December 2017, and December 2022, provides the framework for achieving California’s goals (CARB, 2022).

In passing AB 32, the California Legislature found that:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems.

Other major Executive Orders, legislation, and regulations adopted for the purpose of reducing GHG emissions support the implementation of AB 32 and California's climate goals, as described below.

California Governor's Executive Orders on GHG Emissions. In September 2018, Executive Order B-55-18 established a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The ARB was directed to develop the framework for implementing the goal of carbon neutrality. Executive Order B-30-15 (April 2015) established a California GHG reduction target of 40 percent below 1990 levels by 2030. One purpose of the 2030 target is to ensure California meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050 (Executive Order S-3-05, June 2005). Senate Bill 32 (SB 32) of 2016 codified the GHG emissions target to 40 percent below the 1990 level by 2030.

Local

Yolo County General Plan

The 2030 Yolo Countywide General Plan and accompanying Climate Action Plan include numerous policies and measures to reduce fossil fuel reliance and greenhouse gas emissions through county actions. The Final Environmental Impact Report (EIR) for the 2030 Yolo Countywide General Plan concluded that while the severity of GHG and climate change impacts related to planned urban growth could be reduced by some policies and some available mitigation measures, the overall impact could not be reduced to a less than significant level. The General Plan EIR identified GHG and global climate change as significant and unavoidable impacts that would result from implementation of the General Plan due to associated increases in GHG emissions (Yolo County, 2009).

5.8.2. Environmental Impacts

(a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

LESS THAN SIGNIFICANT IMPACT. The proposed Project would cause GHG emissions due to construction activities and during operation. Construction and operation activities would cause GHG emissions as a result of fossil-fuel combustion in the engines of construction equipment and the vehicles carrying construction materials and workers to and from the site. Diesel fuel or gasoline is used in mobilizing the heavy-duty construction equipment, site development and preparation, facility construction, and roadway construction, and eventual decommissioning. Total GHG emissions over the duration of construction would amount to 57 metric tons of CO₂ equivalent (MTCO₂e). Upon completing construction, on-site maintenance activities would be intermittent and limited, and therefore, contribute a minor amount to annually recurring emissions. The standby diesel generator would be used sparingly during emergencies and intermittently for testing and maintenance. No on-site employees would be needed. As such, the project would not generate GHG emissions that would have significant impact on the environment.

(b) Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

LESS THAN SIGNIFICANT IMPACT. The proposed Project would install a new wireless communications facility and would not cause population growth, nor run consistently on fossil fuel. Because the proposed Project would primarily use grid electricity to service wireless communications, it would not conflict with any applicable plans, policies, or regulations regarding greenhouse gas reduction. Therefore, the impact would be less than significant.

5.8.3. Greenhouse Gas Emissions Impact Conclusion

The proposed Project would not generate GHG emissions that would have significant impact on the environment or conflict with any applicable plans, policies, or regulations regarding greenhouse gas reduction. No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.9. Hazards and Hazardous Materials

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.9.1. Setting

This section addresses issues related to environmental hazards and hazardous materials in the existing conditions. Environmental hazards include accidental spills of hazardous materials, the presence of existing subsurface contamination, the risk of wildfire, and aircraft safety. Hazardous materials include fuel, oil, and lubricants. If encountered, contaminated soil can pose a health and safety threat to workers or the public.

Existing and past land use activities are commonly used as indicators of sites where hazardous material storage and use may have occurred or where potential environmental contamination may exist. For example, many historic and current industrial sites have soil or groundwater contaminated by hazardous substances. Other hazardous materials sources include leaking underground tanks in commercial and rural areas, contaminated surface runoff from polluted sites, and contaminated groundwater plumes. Current and former agricultural properties commonly have herbicide, pesticide, and/or fumigant soil contamination.

The proposed Project site is located on a 23.79-acre parcel with irrigated crop fields. There is an existing well approximately 50 feet south of the Project site, as well as an aboveground diesel tank. The Project site is bordered by other agricultural fields to the east, south, north, and west, which is typical of unincorporated Yolo County. North of the property, beyond an irrigated row crop field, are residential homes and the City of Woodland city limit.

Zamora Elementary School and Woodland Haven Preschool are located 0.4 and 0.3 mile northwest of the proposed Project site, respectively. The closest health facility is the Woodland Memorial Hospital 0.7 mile north. The nearest privately owned airstrip is Medlock Field Airport (69CL), located 3.3 miles southeast of the Project site. The nearest public airport is the Yolo County Airport (KDWA), about 6.3 miles southwest

of the Project site in unincorporated Yolo County, west of the City of Davis. The Sacramento International Airport (SMF) is about 10.5 miles east of the Project. The Watts-Woodland Airport (O41) is the oldest, privately owned and publicly used airport facility in the country and is located approximately 4.6 miles northwest of the Project site. The University Airport is a publicly owned facility, located approximately 2 miles southwest of Davis and 8.4 miles directly south of the Project site, on the UC Davis campus.

There are several forms of hazardous materials in Yolo County; common products such as gasoline, paint solvents, household cleaning products, and refrigerants are categorized as hazardous materials and present throughout the County. “Brownfield” sites are those where expansion or redevelopment is complicated by real or perceived contamination from prior or current uses. There are currently no brownfield sites in the Project vicinity (US EPA, 2025). Superfund sites are significantly contaminated properties as designated by the federal U.S. Environmental Protection Agency (US EPA) list. Yolo County contains five superfund sites, with the closest one located in Woodland about 3.7 miles northeast from the Project location.

Electromagnetic Fields

Electric voltage and electric current from transmission lines and other electronic equipment, such as cell towers, create electromagnetic fields (EMF). Possible health effects associated with exposure to EMF have been the subject of scientific investigation since the 1970s, and there continues to be public concern about the health effects of EMF exposure. However, EMF is not addressed here as an environmental impact under CEQA. The California Public Utilities Commission (CPUC) has repeatedly recognized that EMF is not an environmental impact to be analyzed in the context of CEQA because: (1) there is no agreement among scientists that EMF creates a potential health risk; and (2) there are no defined or adopted CEQA standards for defining health risks from EMF (CPUC, 2025). EMF levels decrease rapidly as the distance from the source increases. The nearest residents are over 530 feet away from the proposed Project. Additionally, since the tower is 140 feet tall, the distance to receptors is even greater than if the source of EMF were at ground level. At ground level near typical cellular towers, the EMF values are much smaller than the limits for safe exposure set by the US Federal Communication Commission and other regulatory authorities (American Cancer Society, 2020).

Regulatory Background

Hazardous substances are defined by federal and state regulations that aim to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be considered hazardous. Hazardous substances are defined in the federal Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 101(14), and in the California Code of Regulations (CCR), Title 22, Chapter 11, Article 2, Section 66261, which provides the following definition:

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.

For this analysis, soil that is excavated from a site containing hazardous materials would be considered to be a hazardous waste if it exceeded specific CCR Title 22 criteria or criteria defined in CERCLA or other relevant federal regulations. Remediation (cleanup and safe removal/disposal) of hazardous wastes found at a site is required if excavation of these materials occurs; it may also be required if certain other activities occur. Even if soils or groundwater at a contaminated site do not have the characteristics required to be

defined as hazardous wastes, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking lead jurisdiction.

Federal

The federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established a program administered by the US EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the “cradle-to-grave” system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

CERCLA, including the Superfund program, was enacted by Congress on December 11, 1980. This law provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA established requirements concerning closed and abandoned hazardous waste sites; provided for liability of persons responsible for releases of hazardous waste at these sites; and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List (NPL). CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

State of California

The California Environmental Protection Agency (Cal/EPA) was created in 1991, which unified California’s environmental authority in a single cabinet-level agency and brought the Air Resources Board (ARB), State Water Resources Control Board (SWRCB), Regional Water Quality Control Boards (RWQCBs), Integrated Waste Management Board (IWMB), Department of Toxic Substance Control (DTSC), Office of Environmental Health Hazard Assessment (OEHHA), and Department of Pesticide Regulation (DPR) under one agency. These agencies were placed within the Cal/EPA “umbrella” for the protection of human health and the environment and to ensure the coordinated deployment of State resources. Their mission is to restore, protect and enhance the environment, to ensure public health, environmental quality, and economic vitality.

The California Hazardous Waste Control Law (HWCL) is administered by Cal/EPA to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the US EPA approves the California program, both the state and federal laws apply in California. The HWCL lists 791 chemicals and about 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

DTSC is the primary agency in California that regulates hazardous waste, cleans-up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337 340). The regulations

specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

Local

The following relevant goals and policies are presented in the Yolo County General Plan Health and Safety Element (Yolo County, 2009):

- **GOAL HS-4: Hazardous Materials.** Protect the community and the environment from hazardous materials and waste.
- **Policy HS-4.1:** Minimize exposure to the harmful effects of hazardous materials and waste.

5.9.2. Environmental Impacts

(a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

LESS THAN SIGNIFICANT IMPACT. Construction of the telecommunications tower may require the use and transportation of small amounts of hazardous materials such as vehicle fuels, hydraulic fluid, lubricants, or solvents. During construction, other vehicle and maintenance fluids may be stored at the construction staging area in construction vehicles. No acutely hazardous materials would be used. Spills or releases of hazardous materials could result from improper handling or storage practices during construction activities, potentially leading to soil or groundwater contamination. Additionally, there is a risk of contamination to the South Fork Ditch, which runs north-south approximately 720 feet west of the Project's western boundary.

Operation and maintenance of the facility requires the use of a 30-kW emergency backup diesel generator, which has a 190-gallon fuel tank. However, no additional fuel will be stored on-site, and the generator will only run in the event of an emergency power outage. The generator will be turned on and run for 10 to 15 minutes once per month for maintenance purposes. Any stored materials would be required to comply with federal, state, and Yolo County Environmental Health regulations.

Compliance with BMPs, permit requirements, building code requirements, and all applicable rules and regulations pertaining to hazardous materials would ensure the proposed Project would have less than significant impacts pertaining to creating a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

(b) Would the project 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?

LESS THAN SIGNIFICANT IMPACT. Accidental spills of hazardous materials could occur as a result of improper handling and/or storage practices during construction or operation and maintenance activities, potentially causing soil or groundwater contamination, or contamination of the nearby creek, stream, and ponds. However, as discussed previously, best use practices for transporting, using, or storing potentially hazardous materials will minimize the potential impact from the accidental release of hazardous materials to the environment.

(c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

LESS THAN SIGNIFICANT IMPACT. As mentioned previously, the nearest school (Woodland Haven Preschool) is located approximately 0.3 mile northwest of the proposed Project site. The Project would not emit hazardous emissions, nor would it use acutely hazardous materials. Construction of the Project may require the use and transportation of small amounts of hazardous materials. During operation, there

would be no additional fuel stored on-site for the emergency backup diesel generator, and no hazardous materials stored on-site. Therefore, impacts would be less than significant.

(d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

NO IMPACT. A review of the DTSC Cortese List shows that there are three known hazardous material or environmentally contaminated sites in Yolo County. However, the closest one is about 9 miles southeast of the proposed Project site (DTSC, 2025).

(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

NO IMPACT. As stated previously, the nearest public use airport (Watts-Woodland Airport) is located about 4.6 miles northwest of the Project site. Therefore, there would be no potential safety impacts related to an airport land use plan or airport within 2 miles of the Project site, and the Project would not result in a safety hazard for people residing or working in the Project area.

(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

NO IMPACT. Oversize truck trips are expected to deliver large pieces of construction equipment and communications tower materials to the site during construction. However, as discussed in Section 5.17, Transportation, due to the low volume, traffic along state and local roadways would not be impacted by these trips. During both construction and operation and maintenance, the Project would not have an impact on emergency access, or limit access in any way. The purpose of the tower construction is to improve communication throughout the area, and thus, facilitate improved emergency access. Therefore, the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

(g) Expose people or structure, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

NO IMPACT. The proposed Project site is not located in a fire hazard severity zone. The closest hazard area in the Capay Valley near Esparto, more than 14 miles west of the proposed site (CAL FIRE, 2024).

5.9.3. Hazards and Hazardous Materials Conclusion

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.10. Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:					
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i)	result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv)	impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.10.1. Setting

The Project site is located within the Yolo Subbasin of the larger Sacramento Valley groundwater basin. The Yolo Subbasin boundaries approximately mirror the Yolo County boundaries; the Subbasin is approximately 27 miles wide from west-to-east and up to 45 miles long from north-to-south. The Subbasin is bounded on the east by the Sacramento River and the west by the Coast Ranges. Putah Creek forms the southern boundary from the southwestern corner of the Subbasin to the City of Davis, at which point the boundary follows the Yolo County line to the south. The Subbasin's northern boundary follows the Yolo County boundary (Yolo Subbasin Groundwater Agency, 2022).

Surface Water

Surface water supplies in Yolo Subbasin include numerous creeks emanating from the Coast Range and foothills. These creeks flow eastward toward the Sacramento River, which is the eastern boundary of the Subbasin (GEI Consultants, 2022). The major watersheds and surface water features in Yolo County include Cache Creek, Putah Creek, the Sacramento River, and the Yolo Bypass. Cache Creek is about 5.0 miles northwest of the proposed Project site. The closest water source is the South Fork Ditch, an irrigation ditch located 0.1 mile west.

An extensive network of sloughs, irrigation canals, and drainage ditches are located throughout the County, including the Tehama-Colusa Canal, Colusa Basin Drain, Willow Slough, Winters Canal, West Adams Canal, and Elk Slough. Yolo County does not have any natural lakes. The Yolo County Flood Control and Water Conservation District's (YCFCWCD) water supply system consists of Clear Lake and Indian Valley Reservoir, which are located west of the Subbasin in the Coast Range (GEI Consultants, 2022). Drainage

facilities in the unincorporated County are limited, often resulting in localized flooding. Agricultural land often uses on-site ditches to convey water to existing roadside ditches (Yolo County, 2009a).

Groundwater

The Yolo Subbasin Groundwater Agency (YSGA), a group of member agencies and affiliated parties, acts as the Groundwater Sustainability Agency for Yolo Subbasin under the Sustainable Groundwater Management Act (SGMA) (GEI Consultants, 2022). The Yolo Subbasin has been classified by SGMA as a “medium priority” basin and YSGA is in the process of preparing a Groundwater Sustainability Plan for the Subbasin (GEI Consultants, 2022).

Yolo County has an extensive system of both shallow and deep aquifers. Domestic and agricultural land uses rely on groundwater, in addition to surface water, to supply their water needs. Wells in the County are increasingly tapping deeper aquifers, contributing to issues of subsidence and contamination. Groundwater levels in the Yolo Subbasin vary significantly seasonally and show large declines during periods of drought but seem to fully recover after periods of normal precipitation (GEI Consultants, 2022). The greatest amount of subsidence, approximately 4 feet over several decades, has occurred east of Zamora, where irrigation needs are supplied exclusively from groundwater because no surface water sources exist. The primary source of groundwater recharge is applied irrigation water and rainfall. Recharge occurs naturally and through the release of stored water from the Indian Valley Reservoir into Cache Creek during low flows (Yolo County, 2009a).

The California Soil Resource Lab at University of California, Davis developed a Soil Agricultural Groundwater Banking Index for groundwater recharge on agricultural land. The scale ranges from 0 (poor) to 100 (excellent) and is based on five major factors: deep percolation, root zone residence time, topography, chemical limitations, and soil surface condition. The proposed Project site, and entire Project parcel, have a rating of 75, indicating good suitability for groundwater recharge (UC Davis, 2025).

Groundwater contamination is also an issue in parts of the county. The main contamination sources are coliform from underperforming septic systems, nitrates from agricultural runoff and disposal areas, and dissolved salts from evapotranspiration of irrigation water. Groundwater pollution potential is evaluated on the DRASTIC index range; this range is based on factors such as depth to water, soils, topography, and hydraulic conductivity. The proposed Project location has a moderate groundwater pollution potential of 140 to 159, on a scale that ranges from less than 70 to 199 (Yolo County, 2009b).

Water Quality

Water quality constituents that have the potential to impact the groundwater quality of the Yolo Subbasin are arsenic, hexavalent chromium, nitrate, chloride, sodium, boron, selenium, conductivity, and total dissolved solids (TDS). In the Subbasin, arsenic, hexavalent chromium, boron, and selenium are predominantly naturally occurring. Constituents related to salinity – chloride, conductivity, sodium, and TDS – also naturally occurring but appear to be increasing due to land use factors. Elevated nitrate levels in the groundwater are predominately due to overlying land use and human activity (GEI Consultants, 2022).

The quality of surface water in Yolo County varies and is likely to be diminished after major storms. Chemicals such as boron, diazinon, mercury, and unknown toxics are pollutants found in Yolo County waterways (Yolo County, 2009b). Several of the rivers and sloughs in Yolo County are listed as impaired water bodies under Clean Water Act Section 303(d) and have Total Maximum Daily Loads (TMDLs) for a variety of contaminants. Water bodies in the vicinity of the Project site with TMDLs include Lower Cache Creek (about 4.4 miles northwest) and Willow Slough (about 2.8 miles south) (SWRCB, 2022).

Regulatory Background

The Clean Water Act (CWA; 33 U.S.C. Section 1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and certain non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is delegated to, and administered by, California's nine Regional Water Quality Control Boards (RWQCB). In addition, the State Water Resources Control Board (SWRCB) regulates the NPDES stormwater program. The proposed Project is under the jurisdiction of the Central Valley Regional Water Quality Control Board and the SWRCB.

Projects that disturb one or more acres are required to obtain NPDES coverage under the California General Permit for Discharges of Storm Water Associated with Construction Activity. The proposed Project would disturb less than one acre of land, and therefore, does not need to obtain a permit. However, an erosion control plan would be implemented as a standard condition of approval of the Project. The erosion control plan would describe BMPs the discharger will use to protect stormwater runoff and protect groundwater quality.

The following relevant goals and policies are presented in the Yolo County General Plan Conservation and Open Space Element (Yolo County, 2009a):

- **GOAL CO-5:** Water Resources. Ensure an abundant, safe, and sustainable water supply to support the needs of existing and future generations.
- **Policy CO-5.1:** Coordinate with water purveyors and water users to manage supplies to avoid long-term overdraft, water quality degradation, land subsidence, or other potential problems.
- **Policy CO-5.6:** Improve and protect water quality for municipal, agricultural, and environmental uses.
- **Policy CO-5.14:** Require that proposals to convert land to uses other than agriculture, open space, or habitat demonstrate that groundwater recharge will not be significantly diminished.

The following relevant goals and policies are presented in the Yolo County General Plan Public Facilities and Services Element (Yolo County, 2009b):

- **GOAL PF-2:** Stormwater Management. Provide efficient and sustainable stormwater management to reduce local flooding in existing and planned land uses.
- **Policy PF-2.1:** Improve stormwater runoff quality and reduce impacts to groundwater and surface water resources.

5.10.2. Environmental Impacts

(a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

LESS THAN SIGNIFICANT IMPACT. During construction of the proposed Project, there would be a potential for spills of oil, grease, or other pollutants associated with the use of vehicles, equipment, and materials used in construction, as well as the potential for increased erosion and sedimentation associated with soil disturbance. Implementation of an erosion control plan would be required as a standard condition of approval for the Project, which will designate BMPs designed to minimize construction impacts to surface and groundwater related to erosion and stormwater runoff. Compliance with BMPs, permit requirements, building code requirements, and all applicable rules and regulations pertaining to hazardous materials

would minimize impacts to surface or groundwater in the event of a spill of a hazardous or potentially hazardous material, including oil or grease.

The risk of degraded surface or groundwater quality would likely only be pertinent if a precipitation event were to occur during soil-disturbing activities or a spill. Use of construction BMPs would prevent spills and reduce potential water contamination impacts to a less than significant level.

(b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

LESS THAN SIGNIFICANT IMPACT. The telecommunications tower does not require a permanent, long-term water source. The proposed Project does not require water for dust-management during construction because no grading activities will occur. The Project would not decrease groundwater supplies or interfere with groundwater recharge.

(c) Would the project 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;

LESS THAN SIGNIFICANT IMPACT. The proposed Project would cause temporary disturbance of up to 0.071 acre and permanent disturbance of 0.021 acre. No grading is needed, and the small ground disturbance area would not cause substantial erosion or siltation on- or off-site. Erosion control measures would be implemented for exposed surfaces subject to soil erosion. Implementation of BMPs would reduce erosion and transport of soil particles into the drainage course. Impacts related to erosion or siltation would be less than significant.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

LESS THAN SIGNIFICANT IMPACT. The proposed Project has a very small permanent disturbance area of 0.021 acre. The cell tower's all-weather surface (30 feet by 30 feet), tower footings, and concrete foundation for installation of the 3-bay walk-up cabinet (6 feet by 12 feet) are the main impervious layers that would be installed, and they are not large enough to cause a significant change in the drainage pattern at the Project site. Therefore, impacts would be less than significant.

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

NO IMPACT. Water for dust control during construction of the Project is not needed, due to the small amount of disturbance. Long-term, water would not be needed for operation or maintenance of the facility.

The Project would not create or contribute runoff water or provide substantial additional resources of polluted runoff. Because there are no existing or planned stormwater drainage systems at the Project site, the Project would have no impact on a stormwater drainage system.

iv. impede or redirect flood flows?

LESS THAN SIGNIFICANT IMPACT. The nearest flood hazard zone from the proposed Project site is 1.4 miles away (FEMA, 2024). The tower's proposed all-weather surface (30 feet by 30 feet) and concrete foundation (4 feet by 9 feet) would be very small and does not require grading. Therefore, the total permanent disturbance area (0.021 acre) would not be likely to impede or redirect flood flows, and the impact would be less than significant. Additionally, the proposed Project site is in an area of minimal flood hazard, with a less than 0.2 percent annual chance of flooding (FEMA, 2024).

(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

NO IMPACT. The closest major lake, Lake Berryessa, is 22.6 miles away and separated by a mountainous region, limiting any effects from seiche. Additionally, the Project would not be located in a tsunami zone. The Project's permanent footprint (0.021 acre) is very small and would be located at an elevation of 75 feet, lowering the risk of inundation. Therefore, there would be no impact or risk of release of pollutants due to Project inundation.

(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

LESS THAN SIGNIFICANT IMPACT. The proposed Project is under the jurisdiction of the Central Valley Regional Water Quality Control Board. The Central Valley Regional Water Quality Control Plan covers all the drainage basin areas for the Sacramento and San Joaquin rivers, extending approximately 400 miles from the California-Oregon border to the headwaters of the San Joaquin River. This plan describes the beneficial uses to be protected in these waterways, water quality objectives to protect those uses, and implementation measures to make sure those objectives are achieved. Compliance with NPDES, and other applicable regulations, would be required. It is expected that the proposed Project would follow all applicable permits and regulations. Additionally, the proposed Project would not conflict with or obstruct the Yolo County 2006 Groundwater Management Plan.

The Project would have a very small temporary and permanent footprint. The cell tower's all-weather surface (30 feet by 30 feet), tower footings, and concrete foundation for installation of the walk-in cabinet (6 feet by 12 feet) are part of the permanent disturbance. Project activities would not include any discharge of water that could impact water quality. There is a potential for spills of oil, grease, or other water contaminants associated with the use of vehicles, equipment, and materials used in construction, as well as the potential for increased erosion and sedimentation associated with soil disturbance. As stated in (a) and (c) above, the small project footprint and implementation of BMPs would reduce potential water contamination impacts that could conflict with the Water Quality Control Plan to less than significant.

5.10.3. Hydrology and Water Quality Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.11. Land Use and Planning

LAND USE PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.11.1. Setting

Yolo County has a strong focus on protecting its agricultural and open space reserves, commodities, and identity. The County resists urbanization outside of the cities and unincorporated communities with the goal of maintaining its rural character. The 2030 Countywide General Plan outlines the following strategies for the development vision for growth in the coming years:

1. Modest managed growth within specified existing unincorporated communities, where accompanied by improvements to existing infrastructure and services, as well as by suitable new infrastructure and services.
2. Opportunities for revenue-producing and job-producing agricultural, industrial and commercial growth in limited locations and along key transportation corridors.
3. Thresholds that allow for effective and efficient provision of services, consistent with rural values and expectations.
4. New emphasis on community and neighborhood design requirements that reflect “smart growth” principles and complement the character of existing developed areas.

The Project site is located on Assessor’s parcel number (APN) 039-030-017. The 23.79-acre parcel is flat agricultural land located in Yolo County unincorporated area, just south of Woodland’s city border. County Road 99 is located east of the parcel and provides an access road to the site. The parcel is designated Agriculture (AG) in the Yolo County General Plan and is zoned Agricultural Intensive (A-N). All construction disturbance would be within the Project site and localized around the work area.

Regulatory Background

The Yolo County Code contains the primary land development regulations of the county. Regarding wireless telecommunication facilities, Title 8 (Zoning Code) of the County Code states, “Large wireless telecommunication facilities constructed on parcels less than forty (40) acres, on lands zoned for agricultural, industrial, open space and recreation uses, shall be considered in all cases for approval of a Major Use Permit” (Section 8-2.1102, 2023). Construction of a large wireless telecommunication facility may be approved in the A-N zoning district, provided the facility meets the development standards set forth in Section 8-2.1102(e), below:

(e) Development standards. The following development standards shall be satisfied prior to the approval of a wireless communications facility:

- (1) The site can provide all necessary infrastructure for the development of the proposed wireless communication facility. The minimum parcel size required for a large telecommunication facility shall be two (2) acres.

- (2) Opportunities to co-locate the subject facility on an existing facility have either been exhausted or are not available in the area.
- (3) The facility as proposed is necessary for the provision of an efficient wireless communication system.
- (4) The development of the proposed wireless communication facility will not significantly affect the existing onsite topography and vegetation; or any designated public viewing area, scenic corridor or any identified environmentally sensitive area or resource. Wireless communication facilities proposed to locate in a designated scenic corridor, including areas identified by the General Plan as providing scenic value, may require stealth design elements to mitigate visual impacts.
- (5) The proposed wireless communication facility will not create a hazard for aircraft in flight and will not hinder aerial spraying operations.
- (6) The applicant agrees to accept proposals from future applicants to co-locate at the approved site.
- (7) The applicant agrees to reserve space and/or provide conduit available for County and emergency communications.

The following relevant goal and policies are presented in the Yolo County General Plan Land Use and Community Character Element (Yolo County, 2009a):

- **Policy LU-1.1:** Assign the following range of land use designations throughout the County, as presented in detail in Table LU-4 (Land Use Designations):
 - **Agriculture (AG)** includes the full range of cultivated agriculture, such as row crops, orchards, vineyards, dryland farming, livestock grazing, forest products, horticulture, floriculture, apiaries, confined animal facilities, and equestrian facilities. It also includes agricultural industrial uses (e.g., agricultural research, processing and storage; supply; service; crop dusting; agricultural chemical and equipment sales; surface mining; etc.) as well as agricultural commercial uses (e.g., roadside stands, “Yolo Stores,” wineries, farm-based tourism (e.g., u-pick, dude ranches, lodging), horse-shows, rodeos, crop-based seasonal events, ancillary restaurants and/or stores) serving rural areas. Agriculture also includes farmworker housing, surface mining, and incidental habitat.
- **Goal LU-2:** Preserve farmland and expand opportunities for related business and infrastructure to ensure a strong local agricultural economy. This goal is implemented through the programs noted in AG-1.14 above.
- **Policy LU-2.4:** Vigorously conserve, preserve, and enhance the productivity of the agricultural lands in areas outside of adopted community growth boundaries and outside of city spheres of influence. This policy is implemented through adherence to urban growth boundaries designated by Yolo County’s incorporated cities, and in conjunction with LAFCO’s determination of the cities’ spheres of influence.

The following relevant policies are presented in the Yolo County General Plan Public Facilities and Services Element (Yolo County, 2009b):

- **Goal PF-11:** Utilities and Communications. Support a flexible network of utility services to sustain state-of-the-art community livability and economic growth.
- **Policy PF-4.6:** Improve emergency communications technologies to provide interoperable service in rural areas.
- **Policy PF-11.2:** Encourage expanded coverage and enhanced quality for communication technology, such as mobile connectivity, high-speed wireless internet access, and emergency communication systems.

The following relevant principle, objective, and goals are presented in the Yolo County General Plan Vision and Principles Element (Yolo County, 2009c):

- **Principle 6:** Technology, information and communications advance our communities.
- **Objective 6.4:** Technology that supports improved information access, emergency services, multi-agency communications, and the exchange of information to and from the field.

The Project site is not located within any community growth boundaries, or city sphere of influence.

Yolo Local Agency Formation Commission (LAFCO)

This commission is “a close partner in the County’s agricultural preservation efforts. LAFCO’s strong preservation posture, its Agricultural Conservation Policy and mitigation requirements are intended to preserve agricultural lands. These policies and requirements also serve to discourage the premature conversion of prime agricultural lands to urban uses” (Yolo County, 2009a). Although the Project does not require LAFCO approval, it is consistent with LAFCO’s agricultural mitigation policies.

5.11.2. Environmental Impacts

(a) Would the project physically divide an established community?

NO IMPACT. The Project would not be located within an established community but is instead located on private agricultural land. The telecommunications tower would be built with the intent of improving cellular communication through the designated area of unincorporated Yolo County and the city of Woodland. All construction disturbance would be within the private land of the Project site and localized around the work area only. Site access would be provided from CR 99 and an existing farm access road located on the private property. Therefore, no aspect of the Project would divide an established community.

(b) Would the project 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?

NO IMPACT. The Yolo County Zoning Ordinance allows communication towers as a qualified Use Type in A-N zoned areas, subject to approval of a Major Use Permit by the Board of Supervisors upon a recommendation by the Planning Commission. Therefore, there are no impacts due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

5.11.3. Land Use and Planning Impact Conclusions

The proposed Project would not physically divide an established community or conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.12. Mineral Resources

MINERAL RESOURCES

Would the project:		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.12.1. Setting

Mineral Resource Zones (MRZs) are used by the State to define areas containing valuable mineral deposits. The California Department of Conservation (DOC) has prepared three Surface Mining and Reclamation Act (SMARA) Special Reports (#156, #245, and #255) for Yolo County. Special Report 245 was the first mineral land classification study of concrete aggregate resources in the Greater Sacramento Area Production-Consumption Region. There are 1,458 acres of MRZ-1, 18,452 acres of MRZ-2, and 8,220 acres of MRZ-3 in Yolo County (Yolo County, 2009a). The MRZ categories are shown in Table 5.12-1.

Table 5.12-1: SMARA Mineral Resource Zone Categories

MRZ-1	Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
MRZ-2	Areas underlain by mineral deposits where geologic data shows that significant measured or indicated resources are present. Such areas contain discovered mineral deposits that are either measured or indicated reserves as determined by such evidence as drilling records, sample analysis, surface exposure, and mine information; or such areas may be inferred reserves or deposits that are presently sub-economic as determined by limited sample analysis, exposure, and past mining history.
MRZ-3	Areas containing known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification of specific localities into the MRZ-2 category.
MRZ-4	Areas where geologic information does not rule out either the presence or absence of mineral resources. The distinction between the MRZ-1 and MRZ-4 categories is important for land use considerations. It must be emphasized that MRZ-4 classification does not imply that there is little likelihood for the presence of mineral resources, but rather there is a lack of knowledge regarding mineral occurrence. Further exploration work could well result in the reclassification of land in MRZ-4 areas to MRZ-3 or MRZ-2 categories.

Source: Department of Conservation State Mining and Geology Board, Guidelines for Classification and Designation of Mineral Lands.

SMARA = Surface Mine and Reclamation Act of 1975

The Project site is just south of the Woodland city limits in unincorporated Yolo County. The Project site is designated as MRZ-1 in SMARA Special Report 245, with an area of MRZ-3 nearby (O'Neal and Guis, 2018). The Project site is not known to support significant mineral resources.

According to the Yolo County General Plan, Conservation and Open Space Element, Yolo County has two primary mineral resources, mined aggregate and natural gas. These resources are located throughout the County; there are six aggregate mines, and 25 natural gas fields currently in operation in Yolo County (Yolo

County, 2009a). Yolo County is one of the 28 counties in California that produce gas and oil. Most of the natural gas fields in Yolo County are located along the Yolo Bypass and the Sacramento River, with more fields located in the unincorporated area of Dunnigan Hills and at the foot of the Capay Hills (General Plan, p. CO-46).

The proposed Project site is surrounded by oil and natural gas fields within a 5-mile radius, including Woodland Gas (ABD), Crossroads Gas (ABD), Merritt Gas, and Harlan Ranch Gas (ABD). None of the gas fields overlap with the Project area (DOC, 2025b). All wells surrounding the Project site are inactive. There are two active mines within a 5-mile radius of the Project site, none of which overlap with the Project area (Table 5.12-2).

Table 5.12-2: Mines Located Near the Project Site

Mine No.	Mine Name	Operation Type	Primary Product	Distance
91-57-0002	Woodland Plant	Streambed or Gravel Bar Skimming and Pitting; Open Pit; Plant or Mill	Sand and Gravel	4.2 miles
91-57-0006	Teichert Schwarzgruber	Open Pit	Sand and Gravel	4.3 miles

Source: Department of Conservation. 2025a. Mines Online.

Other notable mineral resources in Yolo County include naturally occurring asbestos and historic gold mines. Asbestos is a term used for several types of naturally occurring fibrous minerals found in ultramafic rock deposits in California (CARB, 2020). Asbestos emissions typically occur from construction activities and rock quarrying activities where ultramafic rock is present, and exposure can result in health issues such as lung cancer, mesothelioma, and asbestosis (CARB, 2020). There is one reported asbestos occurrence in the northwest corner of Yolo County, more than 35 miles from the Project site, and no occurrences near the Project site itself (DOC, 2011). Yolo County has several historic gold mines located near the McLaughlin Natural Reserve and along Putah Creek (DOC, 1998). None are located near the Project site.

Regulatory Background

Surface Mining and Reclamation Act.

SMARA requires that the State Geologist classify land into MRZ or Scientific Zones according to the known or inferred mineral potential of the land. MRZs were defined previously in Table 5.12-1.

Yolo County General Plan

The Land Use and Community Character Element of the Yolo County General Plan establishes land use designations for the county, including the Mineral Resource Overlay (MRO). There are currently 18,452 acres designated under the MRO (2009b). The Project site is not in a Mineral Resource Overlay zone.

- **Policy LU-1.1:** Assign the following range of land use designations throughout the County, as presented in detail in Table LU-4 (Land Use Designations): Mineral Resource Overlay (MRO) applies to State-designated mineral resource zones (MRZ-2) containing critical geological deposits needed for economic use, as well as existing mining operations.

The following policies are presented in the Yolo County General Plan, Conservation and Open Space Element (Yolo County, 2009a):

- **Policy CO-3.1:** Encourage the production and conservation of mineral resources, balanced by the consideration of important social values, including recreation, water, wildlife, agriculture, aesthetics, flood control, and other environmental factors.
- **Policy CO-3.2:** Ensure that mineral extraction and reclamation operations are compatible with land uses both on-site and within the surrounding area and are performed in a manner that does not adversely affect the environment.
- **Policy CO-3.3:** Encourage the extraction of natural gas where compatible with both on-site and surrounding land uses, and when performed in a manner that does not adversely affect the environment.
- **Policy CO-3.4:** Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable, natural gas policies of the Land Use and Resource Management Plan of the Delta Protection Commission.
- **Policy CO-3.5:** Preserve and protect the County's unique geologic and physical features, which include geologic or soil "type localities," and formations or outcrops of special interest. (DEIR MM GEO-1a)

5.12.2. Environmental Impacts

(a) Would the project 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?

NO IMPACT. The proposed Project site falls in MRZ-1 (areas where adequate geologic information indicates that no significant mineral deposits are present) and is not within a gas field. The Project construction components will not extract any minerals from the site. Additionally, there are no naturally occurring asbestos sites or historic gold mines in the vicinity of the project area. Therefore, the Project would not have an impact on loss of availability of these resources.

(b) Would the project 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?

NO IMPACT. The Yolo County General Plan identifies mined aggregate and natural gas as the important mineral resources found in the County. As stated previously, the Project site is not in or near a mineral resource recovery site identified in a local plan. The nearest local area plan is the Cache Creek Resources Management Plan (CCRMP), adopted by the Yolo County General Plan (Yolo County, 2019). The Project lies about 2.7 miles to the southeast of the area included in the CCRMP. There are no gas fields, mines, naturally occurring asbestos, nor historic gold mines located within the Project area. Therefore, the Project would not result in the loss of availability of a locally important mineral resource recovery site.

5.12.3. Mineral Resources Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.13. Noise

NOISE		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.13.1. Setting

Existing Conditions

Community Noise. To describe environmental noise and to assess project impacts on areas that are sensitive to community noise, a measurement scale that simulates human perception is used. The A-weighted scale of frequency sensitivity accounts for the sensitivity of the human ear, which is less sensitive to low frequencies, and correlates well with human perceptions of the annoying aspects of noise. The A-weighted decibel scale (dBA) is cited in most noise criteria. Decibels are logarithmic units that can be used to conveniently compare wide ranges of sound intensities.

Community noise levels can be highly variable from day-to-day as well as between day and night. For simplicity, sound levels are usually best represented by an equivalent level over a given time period (Leq) or by an average level occurring over a 24-hour day-night period (Ldn). The Leq, or equivalent sound level, is a single value (in dBA) for any desired duration, which includes all of the time-varying sound energy in the measurement period, usually one hour. The L50, is the median noise level that is exceeded 50 per cent of the time during any measuring interval. The Ldn, or day-night average sound level, is equal to the 24 hour A-weighted equivalent sound level with a 10 decibel penalty applied to nighttime sounds occurring between 10:00 p.m. and 7:00 a.m. Community Noise Equivalent Level (CNEL) is another metric that is the average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and after addition of 10 decibels to sound levels in the night from 10:00 p.m. to 7:00 a.m. To easily estimate the day-night level caused by any noise source emitting steadily and continuously over 24 hours, the Ldn is 6.4 dBA higher than the source's Leq. For example, if the expected continuous noise level from equipment is 50.0 dBA Leq for every hour, the day-night noise level would be 56.4 dBA Ldn.

Community noise levels are usually closely related to the intensity of human activity. Noise levels are generally considered low when below 45 dBA, moderate in the 45 to 60 dBA range, and high above 60 dBA. In wilderness areas, the Ldn noise levels can be below 35 dBA. In small towns or wooded and lightly used residential areas, the Ldn is more likely to be around 50 or 60 dBA. Levels around 75 dBA are more common in busy urban areas, and levels up to 85 dBA occur near major freeways and airports. Although people often accept the higher levels associated with very noisy urban residential and residential-commercial zones, they nevertheless are considered to be adverse to public health.

Surrounding land uses dictate what noise levels would be considered acceptable or unacceptable. Lower levels are expected in rural or suburban areas than what would be expected for commercial or industrial zones. Nighttime ambient levels in urban environments are about seven decibels lower than the corresponding daytime levels. In rural areas away from roads and other human activity, the day-to-night difference can be considerably less. Areas with full-time human occupation and residency are often considered incompatible with substantial nighttime noise because of the likelihood of disrupting sleep. Noise levels above 45 dBA at night can result in the onset of sleep interference. At 70 dBA, sleep interference effects become considerable (US EPA, 1974).

Noise Environment in the Project Area. Yolo County's rural setting and predominantly agricultural character generally afford a quieter environment. The ambient noise levels in the Project vicinity are a result of surrounding farming activities and traffic. The primary sources of noise related to farming activity in Yolo County are nighttime diesel pump operations, nighttime harvesting, crop-dusting aircraft, and bird deflection devices. Typical noise levels from tractors as measured at a distance of 50 feet range from approximately 78 dBA to 106 dBA L_{max} (the maximum A-weighted noise level during the measurement period) with an average of 84 dBA L_{max} (Yolo County, 2009). Noise levels such as these are considered to be reasonably representative of noise levels from other wheeled and tracked farm equipment (Yolo County, 2009a).

The proposed Project would be built within a 30-foot by 30-foot (900 sq. ft.) AT&T Lease Area located at CR 99 in Woodland – 530 feet south of Woodland's city boundary – in unincorporated Yolo County, California. The Project is located 0.26 mile east of the CR 99 centerline and 1.8 miles northeast of Harlan Ranch. The nearest cross street for which there is noise data is CR 99 and Del Mar Street in Woodland. Noise levels experienced at 100 feet from the roadway centerline of CR 99 between CR 27 and Gibson Road, which is the roadway segment closest to the proposed Project (for which we have ambient noise data), are approximately 57.5 dBA L_{dn} . (Yolo County, 2009b).

The following scenarios were assumed for the Noise Analysis conducted by Waterford Consultants for the proposed Project (Appendix D, Noise Analysis): 1) Heat Exchanger on the pre-manufactured equipment cabinet running continuously; 2) Generator would be operating in the full load condition; 3) Ambient noise is not considered; 4) Other fencing/landscaping currently on-site is not taken into consideration.

Noise Sensitive Areas. The Project site would be located just south of a single-family residential neighborhood located at the southern boundary of the Woodland city limits. The center of the Project is located approximately 545 feet from the property line of the nearest residential receptor to the north. More specifically, the residential property line that would experience noise levels produced by the potential future noise-generating sources on-site would be located approximately 552 feet from the backup generator, and 532 feet from the heat exchanger.

Regulatory Background

Regulating environmental noise is generally the responsibility of local governments. The US EPA once published guidelines on recommended maximum noise levels to protect public health and welfare (US EPA, 1974), and the State of California maintains recommendations for local jurisdictions in the General Plan Guidelines published by the Governor's Office of Planning and Research (OPR, 2003). These standards are also included in the Yolo County 2030 Countywide General Plan and used to provide guidance for new development projects. Yolo County has not adopted a comprehensive noise ordinance that sets specific noise levels for different zoning districts or for different land uses in the unincorporated area. Therefore, the Yolo County 2030 Countywide General Plan is used for regulatory compliance of noise generated from construction and operation of new development projects. The recommended standards provide acceptable ranges of dB levels. The noise levels are in the context CNEL measurements, which reflect an averaged noise level over a 24-hour or annual period. "Normally acceptable" noise levels are less than

75 dBA CNEL, and up to 80 dBA CNEL would be considered “conditionally acceptable” for outdoor noise levels in agricultural areas (Yolo County, 2009b).

In addition, the following policy and action are presented in the Yolo County General Plan Health and Safety Element (Yolo County, 2009):

- **Policy HS-7.4:** For proposed new discretionary development, where it is not possible to reduce noise levels in outdoor activity areas to 60 db CNEL or less using practical application of the best-available noise reduction measures, greater exterior noise levels may be allowed, provided that all available reasonable and feasible exterior noise level reduction measures have been implemented.
- **Action HS-A62:** Regulated the location and operation of land uses to avoid or mitigate harmful or nuisance levels of noise to the following sensitive receptors: residentially designated land uses; hospitals, nursing/convalescent homes, and similar board and care facilities; hotels and lodging; schools and day care centers; and neighborhood parks. Home occupation uses are excluded.

City of Woodland Municipal Code

Although the Project site is not within the limits of the City of Woodland, due to the Project site being in close proximity to the single-family residential neighborhood to the north, and within the limits of the city of Woodland, the city of Woodland noise ordinance is included for the purposes of addressing construction noise generated by the proposed Project. Specifically, Section 9.28.090 Loud, unnecessary, etc., noises prohibited – Enumeration of such noises:

Section 9.28.090.B.

4. Construction or Repairing of Buildings. The erection (including excavation), demolition, alteration or repair of any building other than between the hours of 7:00 a.m. and 6:00 p.m. on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday, except in case of urgent necessity in the interest of public health and safety, and then only with a permit from the building inspector, which permit may be granted for a period not to exceed three days or less while the emergency continues, and which permit may be renewed for a period of three days or less while the emergency continues. If the building inspector should determine that the public health and safety will not be impaired by the erection, demolition, alteration or repair of any building or the excavation of streets and highways within the hours of 6:00 p.m. and 7:00 a.m. on weekdays and 6:00 p.m. and 9:00 a.m. on Sundays, and if he or she shall further determine that loss or inconvenience would result to any party in interest, he or she may grant permission for such work to be done within the hours of 6:00 p.m. and 7:00 a.m. on weekdays and 6:00 p.m. and 9:00 a.m. on Sundays, upon application being made at the time the permit for the work is awarded or during the progress of the work.

5. Pile Drivers, Hammers, Etc. The operation between the hours of 10:00 p.m. and 7:00 a.m. of any pile driver, steamshovel, pneumatic hammer, derrick, steam and electric hoist or other appliance, the use of which is attended by loud or unusual noise.

6. Tools. The use of or operation between the hours of 10:00 p.m. and 7:00 a.m. of any power saw, power planer or other powered tool or appliance or saw or hammer, or other tool, so as to disturb the quiet, comfort or repose of persons in any dwelling, hotel, apartment or other type of residence, or of any person in the vicinity.

5.13.2. Environmental Impacts

(a) Would the project result in 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?

LESS THAN SIGNIFICANT IMPACT. Construction activities associated with the Project would generate temporary noise due to the transportation and use of heavy construction equipment, which may include the use of utility pick-up trucks, a backhoe, concrete trucks, drilling rig, concrete pump, skid steer tractor, crane, dump trucks, and a soil compactor. Table 5.13-1 shows the Maximum Noise Levels of the combined construction equipment that would be used for various phases of the Project. Site access would be from CR 99, just south of the city limits of Woodland. From there, construction access would be provided through an internal farm road.

When estimating construction noise levels that may occur at the nearest noise-sensitive receptors and in order to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using worst-case conditions and modeled using the Federal Highway Administration's Roadway Construction Noise Model. The results of the modeling are compared against the construction-related noise level threshold established in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998 by the National Institute for Occupational Safety and Health (NIOSH). The NIOSH construction-related noise level threshold starts at a time-weighted average (TWA) of 85 dBA over 8 hours per day; for every 3 dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of TWA 88 dBA over 4 hours per day, TWA of 92 dBA over 1 hour per day, TWA 96 dBA over 30 minutes per day, and up to a TWA of 100 dBA over 15 minutes per day. For the purposes of this analysis, the more conservative threshold of 85 dBA Leq is used as an acceptable threshold for construction noise potentially experienced at the nearby sensitive receptors (NIOSH, 2025).

The Project acknowledges that construction equipment is not typically positioned at any one location during the duration of construction activities, but rather dispersed throughout the site and at various distances from sensitive receptors. Therefore, the Federal Transit Administration (FTA) guidance for calculating construction noise, which recommends modeling construction noise produced by all construction equipment from the center of the Project Site, will be employed for the purposes of the proposed Project (FTA 2018). The center of the Project site would be approximately 545 feet from the nearest sensitive receptor. The anticipated short-term construction noise levels generated for the necessary proposed Project equipment is presented in Table 5.13-1.

Table 5.13-1: Average Construction-Generated Noise Levels (dBA) Experienced at Nearest Residence

Phase	Combined Equipment Noise Level (dBA at 545 ft)	Construction Noise Threshold (NIOSH Standard in dBA Leq)	Exceedance of Threshold?
Site Preparation	65.3	85	No
Tower Installation	66.8	85	No
Site Restoration	55.5	85	No

Source: Roadway Construction Noise Model Analysis. See Appendix E for modeled data outputs (FHWA 2006).

As shown in Table 5.13-1, Project on-site construction activities would not exceed the NIOSH threshold of 85 dBA Leq at the nearest noise-sensitive receptors. While no noise standard would be exceeded by construction of the proposed Project, the Project is located within close proximity to a noise-sensitive residential neighborhood north of the site and within the city of Woodland. As described above, the city noise ordinance states that construction activity is prohibited during certain times of the day, which changes throughout the week. It is expected that the short duration of construction activities would be

audible during daytime hours in the vicinity of the nearest residences to the north. The Project's work hours would be limited through a condition of approval to occur between the hours of 7:00 a.m. and 6:00 p.m. on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday.

Long-term noise levels would be generated from two main sources: the externally mounted HVAC unit of the walk-up cabinet and the emergency diesel generator. As indicated in the noise level data obtained from the Noise Analysis (manufacturer's published noise data [Appendix D, Noise Analysis]), the shelter-mounted A/C unit has a reference noise level of 65 dBA at a distance of 5 feet. The HVAC system would run as needed dependent upon ambient temperature. For noise assessment purposes, it is assumed to run up to 24 hours per day.

The emergency generator is a Generac Industrial Power Systems Model SD030, and according to the manufacturer, it has a reference noise level of 66 dBA at a distance of 23 feet (Appendix D, Noise Analysis). The generator would be used as a back-up power source in case of a power-outage, but it would be tested on a regular basis for 10 to 15 minutes once per month during daytime hours. Both sources of noise are fixed, and therefore, decrease at a rate of approximately 6 dBA for every doubling of distance. The nearest residence is located approximately 530 feet from the HVAC unit and 555 feet from the generator, which is expected to have an exposure to a combined noise level of 28.46 dBA from operation of the facility, and this level would be well within the CNEL requirements (Appendix D, Noise Analysis). Accordingly, a substantial temporary or permanent increase in ambient noise levels would not occur from either construction or operations. Hence, this impact would be less than significant.

(b) Generation of excessive groundborne vibration of groundborne noise levels?

LESS THAN SIGNIFICANT IMPACT. Groundborne vibration is a result of vibrating objects coming into contact with the ground, and that vibration radiating through the ground to nearby buildings. Architectural and structural damage and perceptibility thresholds for residential and historic structures in proximity to the types of construction activities have the potential to occur during construction. Architectural damage includes cosmetic damage, such as cracked plaster, etc. Architectural damage is not considered potentially dangerous.

As shown in Table 5.13-2, pile driving has the greatest potential to result in architectural damage to most building types. Most other construction activities require very small (i.e., less than 25 feet) distances between the structure and the construction equipment or the presence of highly fragile buildings for impacts to occur. For fragile and highly fragile buildings respectively, FTA recommends a limit 94 and 90 vibration velocity (VdB) (FTA 2006). The Yolo County General Plan EIR sets the threshold for annoyance due to vibration in residential settings at 70 VdB (vibrations from noise levels). Groundborne vibration is almost never annoying to people who are outdoors. Typical construction equipment is listed in Table 5.13-2, below, with vibration levels experienced at 25 feet from the source and expressed in peak particle velocity (PPV) and VdB (Yolo County 2009).

The activities that would be most likely to cause groundborne vibration would be the passing of heavy trucks on uneven surfaces. Loaded trucks have a typical vibration level of 86 VdB at 25 feet (Yolo County, 2009). The impact from construction-related vibrations would be confined to the immediate Project area around activities and would cease upon completion of the Project. The nearest residence to the proposed Project is approximately 530 feet to the north. As noise from vibration reduces with distance, any effects

**Table 5.13-2: Typical Construction Equipment
Vibration Source Levels at 25 Feet**

Equipment Type	Approximate VdB at 25 Feet
Pile Driver (impact)	104 – 112
Vibratory roller	94
Large bulldozer	87
Loaded trucks	86
Jackhammer	79

of groundborne vibration or noise levels would be less than the County threshold of annoyance and the FTA threshold for damage to buildings. Therefore, there would be a less than significant impact under this criterion.

(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?

NO IMPACT. The nearest public airport is located approximately 6.3 miles southwest of the proposed Project site. As stated above in part (a), the temporary and permanent noise levels from the Project would be well within the County noise level thresholds and would not impact this or any other airports or airstrips. No excessive noise would result from Project construction or operations that could impact people residing or working near the airstrip. As such, there would be no impact under this criterion.

5.13.3. Noise Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.14. Population and Housing

POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.14.1. Setting

The Project site is located south of the city of Woodland, in unincorporated Yolo County. It is located on agricultural land west of CR 99. As of January 2025, the population of Yolo County, including the cities of Davis, West Sacramento, Winters, and Woodland, was estimated at 225,433, with an estimated annual growth of 0.6 percent (CDF, 2025). The proposed Project site is located on land zoned Agricultural Intensive (A-N). There are residential houses about 530 feet north of the Project site in the city of Woodland, and very few residences on the adjoining agricultural lands to the east, south, and west.

Regulatory Background

The Land Use and Community Character Element of the Yolo County General Plan designates the land uses of the entire county and includes land in unincorporated Yolo County that falls within the “spheres of influence” (SOIs) of the four incorporated cities. SOIs are adopted by the Local Agency Formation Commission (LAFCO) in each County. County LAFCOs were created by the State in 1963 to coordinate logical changes in local governmental boundaries and to promote efficient provision of services, prevent urban sprawl, and preserve agriculture and open space (Yolo County, 2009). The Project parcel is not identified in the 10- or 20- year SOI for the City of Woodland.

5.14.2. Environmental Impacts

(a) Would the project 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)?

NO IMPACT. There would be no direct population growth induced by this Project because it does not involve the construction of new residences or businesses, nor does it provide long-term jobs. Construction needs are not expected to require relocation of workers to the area. The approximately six construction personnel are expected to be mostly derived from the local labor pool. As of January 2025, there were an estimated 73,900 mining, logging, and construction workers residing within El Dorado, Placer, Sacramento, and Yolo counties (CEDD, 2025). The operations and maintenance of the cell tower will be performed by existing AT&T Mobility employees. Therefore, the proposed Project would not result in an increase in population levels nor a decrease in available housing. Therefore, there would be no impact.

(b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

NO IMPACT. The proposed Project would not displace any existing people or housing and would not require the construction of replacement housing. The construction would take approximately 90 to 120 days to

complete and would not require permanent location of workers to the Project area. Therefore, there would be no impact.

5.14.3. Population and Housing Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.15. Public Services

PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.15.1. Setting

The Project site is located within the Willow Oak Fire Protection District. It falls under the jurisdiction of Station 6, located at 17535 CR 97, Woodland, California. The Project will comply with the County and Fire District's requirements regarding fire protection and safety.

Law enforcement services in Yolo County are provided by the County Sheriff-Coroner's Office. This department patrols the County, administers the County Jail and work program, and serves as the County Coroner. The department has over 300 full- and part-time employees and volunteers and serves a population of approximately 200,000 residents (Yolo County Sheriff's Office, 2025).

The Project site is within the Woodland Joint Unified School District, which serves Woodland and the surrounding unincorporated area of Yolo County (Yolo County, 2024). This District has 12 elementary schools, two middle schools, three high schools, and one adult education school. The District office is located at 435 6th Street, Woodland, California, approximately 1.9 miles from the Project site. The Zamora Elementary School is about 1,900 feet and the Woodland Haven Preschool is about 1,600 feet from the proposed Project site.

The Woodland Memorial Hospital is 0.7 mile from the Project site. The City of Woodland has several other medical and urgent care facilities, including Northern Valley Indian Health, Hansen Family Health Center, John H. Jones Community Clinic, Bentec Medical, Spero Medical, Woodland Family Medical, Sutter Medical Plaza, and Dignity Health Woodland Clinic.

Yolo County Parks Division provides park and recreation services within Yolo County. Regional parks in the County offer swimming, hiking, picnicking, camping, boating, fishing, and scenic beauty (Yolo County, 2019). The Cache Creek Conservancy manages the Cache Creek Nature Preserve, a 130-acre complex of wetlands, oak woodlands, grasslands, creekside lands, and trails about 5.1 miles from the Project site (Cache Creek Conservancy, 2025).

The City of Woodland's Community Services Department provides more than 414 acres of parks and recreation facilities, including 27 neighborhood parks, a community sports park, a 50-meter aquatics complex, and six recreational facilities (City of Woodland, 2025). The proposed Project site is about 0.4 mile from Woodside Park and 0.7 mile from Dave Douglass Park.

Regulatory Background

The Yolo County 2030 Countywide General Plan, Public Facilities and Services Element (Yolo County, 2009) includes numerous policies related to public services. Relevant policies are presented below.

- **Policy PF-5.3:** Require assertive fire protection measures in all development to supplement limited rural fire district resources.
- **Policy PF-5.9:** The County shall require, and applicants must provide, a will-serve letter from the appropriate fire district/department confirming the ability to provide fire protection services to the project, prior to each phase.

5.15.2. Environmental Impacts

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

(a) Fire protection?

LESS THAN SIGNIFICANT IMPACT. The proposed Project site is outside the California Department of Forestry and Fire Protection (CAL FIRE) designated Fire Hazard Severity Zones (CAL FIRE, 2023). The nearest fire department with the Willow Oak Fire District is Station 6 (a volunteer station) located at 17535 CR 97, 2.7 miles, or approximately 10 minutes driving, from the Project site (Willow Oak Fire Protection District, 2025). Construction and implementation of the proposed Project could increase the risk for fire, and thus the demand for fire services, due to the electrical distribution lines and the diesel generator with a 190-gallon fuel tank that would be stored on-site as a backup generator to supply power to the cell tower in the event of a power outage. The Project would meet current building and fire codes and comply with all County Fire requirements at the site to reduce the risk of fire. The fire risk would not create the need for new or physically altered fire protection facilities. In addition, the Project would not affect the ability of fire personnel to respond to fires. The Project is not expected to induce population growth in the Project area or affect service ratios, response times, or other performance objectives for fire response services. Therefore, the impact on fire protection services would be less than significant.

(b) Police Protection?

LESS THAN SIGNIFICANT IMPACT. The proposed Project would not require police services during construction or operation and maintenance beyond routine patrols and response at the level currently provided. As with fire protection services discussed previously, the construction and operation of the proposed Project would not induce growth in the Project area, result in a need for additional police facilities, or significantly affect response times or other service performance. Any potential impacts to police protection services would result in a less than significant impact.

(c) Schools?

NO IMPACT. The proposed Project would not be expected to result in an increase in population within the area. Construction is expected to take approximately 90 to 120 days and would not require the permanent relocation of workers to the proposed Project area. All the construction personnel (approximately six workers) would most likely be sourced from the existing local labor force. There would not be an expected increase in families or in school-age children as a result of the temporary construction workers who would not likely migrate to the area. The cell tower will be an unstaffed facility with maintenance activities once per month, which are not expected to result in the relocation of workers.

(d) Parks?

NO IMPACT. The required construction workforce for the Project would likely be hired from the available regional workforce. Although some workers may use recreational areas during Project construction, increased use would be minimal and/or temporary and would not contribute substantially to the physical deterioration of existing facilities. No impacts would occur.

(e) Other Public Facilities?

NO IMPACT. With an average of six construction workers, the Project construction has the potential to temporarily increase the number of people in communities in the Project vicinity. However, public facilities, such as local area emergency medical facilities, are expected to adequately handle a potential small, temporary increase in the local population. Therefore, there would be no impacts on other public facilities.

5.15.3. Public Services Impact Conclusions

The proposed Project would not result in the need for, or provision of, new or physically altered governmental facilities related to fire or police protection, schools, parks, or other public facilities. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.16. Recreation

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.16.1. Setting

Yolo County has three “resource” parks within 5 miles of the proposed Project site. Resource parks are regional and open space parks that are much larger in size than community parks and provide recreational areas for both the County population and outside visitors (Yolo County, 2009). These parks, including the Cache Creek Nature Preserve, Correll-Rodgers Habitat Area, and Wild Wings Park, total approximately 180 acres of land for activities such as swimming, fishing, hiking, camping, picnicking, and enjoying the scenic beauty of the Capay Valley.

The City of Woodland’s Community Services Department provides more than 414 acres of parks and recreation facilities, including 27 neighborhood parks, a community sports park, a 50-meter aquatics complex, and six recreational facilities (City of Woodland, 2024). There are seven community parks within 2 miles of the proposed Project site, including Ferns Park, Grace Hiddleston Park, Streng Park, Woodside Park, Dave Douglass Park, William Crawford Senior Park, and the Woodland Sports Park. The proposed Project site is about 0.4 mile away from Woodside Park and 0.7 mile from Dave Douglass Park, which offer sports fields, open turf areas, restrooms, and walking trails. In addition, Woodside Park offers barbeques, horseshoe pits, picnic areas, a playground, and a tennis court (City of Woodland, 2024).

Regulatory Background

According to the Yolo County 2030 Countywide General Plan, Public Facilities and Services Element (Yolo County, 2009), expanding park and recreation opportunities is required to meet the needs of the population as it increases. This Project will not increase population growth and there are no recreation policies that would apply to the Project.

5.16.2. Environmental Impacts

(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?

NO IMPACT. The temporary Project construction time would be approximately 90 to 120 days, throughout which there would be a maximum of six construction workers. Operation of the facility would not require personnel to visit the site due to its remote operation. Hence, the proposed Project would not substantially increase the use of existing recreational facilities nor cause accelerated deterioration of those facilities.

(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?

NO IMPACT. The Project does not include any use of recreational facilities or require construction or expansion of facilities that might have an adverse physical effect on the environment.

5.16.3. Recreation Impact Conclusions

The proposed Project would not substantially increase the use of existing recreational facilities or require construction or expansion of recreational facilities. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.17. Transportation

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

Significance criteria established by CEQA Guidelines, Appendix G.

5.17.1. Setting

Vehicles associated with the proposed Project would use regional and local roadways, primarily Interstates 5 and 505 (I-5 and I-505) and SR 16 and SR 113 for accessing the site. Direct site access would occur via CR 99, which connects to SR 113 and I-5. At the intersection of SR 113 and CR 25, annual average daily traffic (AADT) volumes on CR 25 were 18,100 vehicles per day as of 2022. At the intersection of SR 113 and Gibson Road (closest intersection with AADT to the Project site), AADT volumes were 17,500 vehicles per day as of 2022 (Caltrans, 2022).

According to the Yolo County General Plan Health and Safety Element, traffic volumes for the roadway segment of SR 113, between Covell Boulevard in Davis and Gibson Road in Woodland, were approximately 15,300 average daily trips (ADT [Yolo County, 2009a]).

Freeways and Highways

Freeways and highways in the Project vicinity include:

- State Route 113, connecting the incorporated cities of Davis and Woodland, and located approximately 1.8 miles east of the site;
- A segment of SR 16, between the municipalities of Woodland and Madison to the west;
- A segment of SR 16 between Woodland and Madison, with its easternmost end intersecting West Main Street in Woodland, located approximately 1.8 miles northwest of the proposed cell tower; and
- A roadway segment of CR 99, from the 4-way junction of SR 16 and West Main Street and traveling north to the I-5 interchange just north of Woodland.

Major Two-Lane County Roads and Local Collector Roads

The nearest local collector street to the proposed Project site is West El Dorado Drive (going east to west), located within the city limits of Woodland and intersecting CR 99 approximately 1,900 feet north of the proposed cell tower. West Gibson Road (also going east to west) is another local collector within the vicinity of the site that allows for commuters to traverse Woodland, from its intersection with CR 99 to the west to I-5 at its easternmost end (changes to CR 24 beyond I-5). The roadway segment of CR 99, adjacent to the eastern boundary of the parcel of land containing the proposed cell tower location, is the closest major two-lane county road to the Project site.

Mass Transit

The nearest mass transit system is the YoloBus system, administered by the Yolo County Transportation District. Services are provided between Davis, West Sacramento, Winters, Woodland, and Downtown Sacramento with stops at popular destinations such as UC Davis, Sacramento International Airport (SMF), UC Davis Medical Center, Sutter Health Park, and Cache Creek Casino Resort (YoloBus, 2024a). The fleet consists of 50 compressed natural gas buses and 10 paratransit vehicles. Buses leave Woodland County Fair Mall Transfer Center hourly from 6:00 a.m. to 9:00 p.m. on weekdays, and 8:00 a.m. to 7:00 p.m. on weekends. The nearest bus stop to the Project is at the Midway Drive and West Gibson Road intersection, approximately 0.6 mile north of the site (YoloBus, 2025b).

Rail

The three remaining operational railroads in Yolo County include the Sierra Northern Railway and Sacramento River Train which connect Woodland and West Sacramento; the Union Pacific which connects Davis and West Sacramento; and the California Northern which connects Colusa County and Davis. Amtrak provides commercial bus service along with passenger train service, offering round-trip train service from downtown Davis to the San Francisco Bay Area and downtown Sacramento. The nearest Amtrak station is located approximately 8 miles southeast in the City of Davis.

Bicycle

Yolo County is a favorable area for bicycling because of its flat terrain, mild climate, and relatively short distances between cities and unincorporated communities. The Yolo County Bicycle Transportation Plan (BTP) formulates a long-range, comprehensive, and consistent policy guide for achieving a Countywide bikeway network and lists current priorities for bicycle facility development. The plan sets forth goals and policies for bicycle facilities in the unincorporated County in response to identified needs (Yolo County, 2013). Designated bicycle (and pedestrian) pathways are not located along roadways accessing the proposed Project site. It is possible that bicyclists use the shoulders of SR 113 and CR 99 in the Project vicinity, given that the municipality of the city of Woodland is directly adjacent to the parcel of land containing the proposed Project site.

Air Transportation

The unincorporated area of Yolo County is home to four primary airports. The main, publicly owned Yolo County Airport (KDWA) is a general aviation airport located approximately 6.3 miles southwest of Woodland and the Project site, and 4 miles west of Davis.

The Watts-Woodland Airport is the oldest, privately owned and publicly used airport facility in the country and is located approximately 4.6 miles west of the Project site, outside of the Woodland city limits. The facility offers a well-maintained 3,700-foot paved, lighted runway, a variety of hangars, and a commercial hangar and shop space that is also available on a case-by-case basis (Watts-Woodland Airport, 2025).

The University Airport is a publicly owned facility, located approximately 2 miles southwest of Davis and 8.4 miles south of the Project site, on the UC Davis campus. Aircraft owners affiliated with the University are the principal users. In addition to the above airports, there are other privately owned airstrips in the unincorporated area, including the Medlock Field Airport located 3.3 miles southeast of the site, that are primarily used for the benefit of the owner and are not available for use by the general public (Yolo County, 2009b).

Sacramento International Airport (SMF), located approximately 10.5 miles east of the Project, is the nearest international airport to the site. SMF is the major commercial airport for the region, including Yolo

County, that provides regularly scheduled passenger service (Sacramento County, 2010). The airport has two terminals, Terminal A, with services from 4 passenger airlines; and Terminal B, with services from 9 passenger airlines; totaling 13 passenger airlines. Cargo service by 4 carriers is also accommodated at the airport, along with general aviation (Sacramento County, 2025). The airport has two parallel runways, each approximately 8,600 feet long (Sacramento County, 2010).

Regulatory Background

Yolo County General Plan 2030 Circulation Element

The County's 2030 General Plan Circulation Element provides guidance in the County for existing and future transportation facilities, which consists of various transportation modes, including roads, transit, bike, pedestrian, rail, aviation and ports. The element also serves as an organizational tool to coordinating with the incorporated cities within the county, the Yolo County Transportation District (YCTD), the Sacramento Area Council of Governments (SACOG) and State and federal agencies that fund and manage the County's transportation facilities. The Circulation Element reflects the urban and rural diversity of the unincorporated areas of Yolo County, reinforces smart growth, and establishes standards that guide development of the transportation system.

Sacramento Area Council of Governments

SACOG is responsible for regional transportation planning in Yolo County. The Metropolitan Transportation Plan (MTP)/Sustainable Communities Strategy (SCS) for 2035 (SACOG, 2023) is a federally mandated long-range fiscally constrained transportation plan for the six-county area that includes El Dorado, Placer, Sacramento, Sutter, Yolo and Yuba counties. Most of this area is designated a federal non-attainment area for ozone, indicating that the transportation system is required to meet stringent air quality emission budgets to reduce pollutant levels that contribute to ozone formation. A project is considered consistent if it is contained in the MTP and is included in the computer modeling of transportation and air quality impacts by SACOG. In addition, any regionally significant transportation project planned for a city or county must be included in the MTP because of its potential effect on travel demand and air pollution.

SACOG serves as the Airport Land Use Commission (ALUC) for Yolo County. The ALUC is responsible for developing and maintaining comprehensive land use plans (CLUPs) to protect public health and safety and ensure compatible land uses in the areas around each airport. Comprehensive land use plans have been prepared for the County Airport, Watts-Woodland and Borges-Clarksburg airports. An Airport Layout Plan (ALP) has been prepared by UC Davis for the University Airport (Yolo County, 2009b).

Yolo County Transportation District

The Yolo County Transportation District (YCTD), which operates the YoloBus local and intercity bus service, offers safe, economical, and sustainable alternatives to conventional transportation within its service area that includes Davis, West Sacramento, Winters, Woodland, downtown Sacramento, Sacramento International Airport, Cache Creek Casino Resort, Esparto, Madison, Dunnigan and Knights Landing. The population of the County is primarily concentrated in smaller municipalities surrounded by mainly agriculturally-cultivate lands. While in the past these services were limited to transit, YCTD is in the process of expanding its services to better meet the mobility needs of its geographically, racially, ethnically, and economically diverse service area. According to the US Department of Transportation's (DOT) RAISE Persistent Poverty Project Status Tool, twenty-two (22) out of the 85 total Census Tracts included in the YCTD service area are Areas of Persistent Poverty. Residents of these areas contend with barriers to access jobs, educational attainment, health, and opportunity (YCTD, 2022).

YCTD was awarded \$1.2 million in federal funding to develop the Yolo Active Transportation Corridors Project to develop an active transportation plan to expand the County's network of multiuse trails (YCTD,

2025). This planning project will build upon YCTD's recent efforts to explore how public interest design of transportation services can be used to address the needs of the region's most isolated and disadvantaged areas, where the impacts of systemic racism, institutional disadvantages of rurality, and disproportionately high environmental burdens generate disparities in socioeconomic outcomes (YCTD, 2024).

5.17.2. Environmental Impacts

(a) Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

NO IMPACT. The proposed Project would result in temporary traffic trips during construction and minimal traffic trips (once per month) for maintenance of the cell tower. Vehicle trips during construction would consist of materials and equipment deliveries in addition to construction worker commutes. Material and equipment deliveries would likely be distributed throughout the workday. Commuter trips are assumed to come from the local area and would be congregated at the beginning and end of the workday. While both temporary and permanent traffic trips would occur on State and local roadways, the Project would not generate a large traffic volume from the 5 to 6 construction workers, or one trip per month for maintenance purposes, to conflict with a program, plan, ordinance or policy addressing the circulation system. There would be no impact.

(b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

LESS THAN SIGNIFICANT IMPACT. According to CEQA Guidelines Section 15064.3 (b), a qualitative analysis of construction traffic vehicle miles travelled (VMT) may be appropriate. As discussed above in section (a), construction worker commuter trips (5 to 6 people) are expected to come from the local area. Some truck trips containing materials may travel long distances to reach the Project site. These long-distance trips may require high VMT to access the Project site, but they would be temporary and very limited in volume due to the limited materials required for construction of the Project. At this time, there are no known applicable VMT thresholds of significance for temporary construction trips that may indicate a significant impact. The operation and maintenance of the facility would require very few (one per month) vehicle trips and would primarily come from the local area.

Pertinent to the proposed Project are those criteria identified in the OPR Technical Advisory of Evaluating Transportation Impacts in CEQA. Specifically, Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses. It further directed OPR to prepare and develop criteria for determining significance:

Screening Threshold for Small Projects:

"Many local agencies have developed screening thresholds to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact." (OPR 2018).

As stated above, the significance threshold for operations workforce for small projects is 110 vehicle trips per day. This is significantly higher than what would be generated by traffic associated with the operation of the cell tower. Therefore, the proposed Project would not affect existing transit uses or corridors, is consistent with the SACOG SCS and the County General Plan and would cause a less than significant transportation impact in regard to CEQA Guidelines Section 15301(e)(2).

(c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

NO IMPACT. All construction disturbance would be located on private land within the proposed Project site. The Project site does not include modifications to any public roadways or driveways. The gravel access road would be improved within a 15-foot-wide non-exclusive easement, by adding road base/aggregate crushed rock to the existing surface, then compacting. However, grading and trenching would not be needed for access to the site and any minor ground disturbances would stay within the easement corridor. This would allow for the continued use of the access road for agricultural purposes, remaining compatible with farm equipment. During construction, oversize truck trips would be expected to deliver large pieces of construction equipment and communication tower materials to the site. All oversized trucks would be required to obtain relevant permits from Caltrans and local jurisdictions, as needed. The construction contractor would follow all rules and requirements of such permits. There would be no impacts due to increased hazards associated with the Project.

(d) Would the project result in inadequate emergency access?

LESS THAN SIGNIFICANT IMPACT. During construction, some oversize truck trips are expected to deliver large pieces of construction equipment and materials to the site. These activities may include brief temporary delays on local roads providing access to the site. However, all oversized truck trips would be required to obtain permits from Caltrans and local jurisdictions, as needed. The construction contractor would follow all rules and requirements of such permits. These permits include assurances for emergency vehicle movements and access. Additionally, no roadway or lane closures are expected during construction. In the event deliveries require any disruption to public roadways, flagmen would be present to ensure traffic flow, including emergency vehicle flow through the area and access to any nearby residences or areas. Once operational, the proposed Project would have no impact on access or movement to emergency service providers. Impacts would be less than significant.

5.17.3. Transportation Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.18. Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i)	listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 Section 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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.18.1. Setting

Tribal Cultural Resources (TCRs) is a newly defined class of resources under Assembly Bill 52 (AB 52). TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a California Native American tribe (Tribe). To qualify as a TCR, the resource must either: (1) be listed on, or be eligible for listing on, the California Register of Historical Resources (CRHR) or other local historic register; or (2) constitute a resource that the lead agency, at its discretion and supported by substantial evidence, determines should be treated as a TCR (PRC §21074). AB 52 also states that tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of TCRs within their traditional and cultural affiliated geographic areas. Therefore, the identification and analysis of TCRs should involve government-to-government tribal consultation between the California Environmental Quality Act (CEQA) lead agency and interested tribal groups and/or tribal persons. (PRC § 21080.3.1(a)).

5.18.1.1. Approach to Analysis of Tribal Cultural Resources

Information presented in this section was gathered through AB 52 government-to-government consultation between Yolo County (County) and the California Native American Tribes that have cultural affiliations with the proposed Project area and that have requested to consult on the proposed Project. Supplementary information was gathered from the cultural resources literature and records search, cultural resources field survey, Native American Heritage Commission (NAHC) Sacred Lands File search, and ethnographic summary that was described in Section 5.5 (Cultural Resources).

5.18.1.2. Project Notification

AB 52 requires that within 14 days of the lead agency determining that a project application is complete, a formal notice and invitation to consult about the proposed Project is to be sent to all tribal representatives who have requested, in writing, to be notified of projects that may have a significant effect on TCRs located within the proposed Project area (PCR Sec. 21080.3.1(d)).

A project description and request for an AB 52 consultation was sent to all tribes requesting notification on January 13, 2025. Notified tribes included the Yocha Dehe Wintun Nation, Wilton Rancheria, Cortina Rancheria Band of Wintun Indians of California, Lone Band of Miwok Indians, and Torres Martinez Desert Cahuila Indians.

5.18.1.3. AB 52 Tribal Consultation

AB 52 states that once California Native American tribes have received the project notification letter, the tribe then has 30 days to submit a written request to consult pursuant to PCR § 21080.3.1(d)). Upon receiving a Tribe's written request to consult, the lead agency then has 30 days to begin government-to-government consultation. Consultation must include discussion of specific topics or concerns identified by tribes. Any information shared between the Tribes and the lead agency representatives is protected under confidentiality laws and subject to public disclosure only with the written approval of the Tribes who shared the information (GC § 6254(r); GC § 6254.10; PCR § 21082.3.(c)(1-2)).

Consultation, as defined in AB 52, consists of the good faith effort to seek, discuss, and carefully consider the views of others. Consultation between the lead agency and a consulting Tribe concludes when either of the following occurs: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists on a TCR; or 2) a consulting party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PCR § 21080.3.2(b)).

No tribe requested to initiate formal consultation under AB 52. Yocha Dehe Wintun Nation (YDWN) provided a response to the County's January 13, 2025, project notification and AB 52 consultation letter. In their response letter dated February 27, 2025, YDWN indicated that they are not aware of any known cultural resources near this project site and a cultural monitor is not needed.

5.18.2. Environmental Impacts

(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and 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)?**

NO IMPACT. No tribal cultural resources are known to occur at or near the project site. The Project includes limited trenching in a previously disturbed area to connect the tower to nearby electricity. In the unlikely event unidentified historical resources existing below the ground surface are discovered during ground disturbing work, the County's standard permit conditions require that the applicant immediately stop work and notify a County building inspection official. Therefore, there would be no impact.

- 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

NO IMPACT. No tribal cultural resources are known to occur at or near the project site. The Project includes limited trenching in a previously disturbed area to connect the tower to nearby electricity. In the unlikely event unidentified historical or cultural resources existing below the ground surface are discovered during ground disturbing work, the County's standard permit conditions require that the applicant immediately stop work and notify a County building inspection official. There would be no impact.

5.18.3. Tribal Cultural Resources Impact Conclusions

No potentially significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.19. Utilities and Service Systems

UTILITIES AND SERVICE SYSTEMS				
Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.19.1. Setting

Although the Project site is located just outside the limits of the City of Woodland, the Project is not within the city's Sphere of Influence and therefore is not included within the city's municipal wastewater system. According to the County General Plan, the most common method of wastewater treatment in unincorporated Yolo County is by private septic system (Yolo County, 2009). On-site wastewater treatment systems are regulated by State law. The State Water Resources Control Board (SWRCB) and the Central Valley Regional Water Quality Control Board have delegated their authority to regulate wastewater systems in the incorporated and unincorporated areas of Yolo County to the Yolo County Environmental Health Division. In June of 2012, the SWRCB adopted the Quality Control Policy for Siting, Design, and Maintenance of Onsite Wastewater Treatment Systems, which went into effect in May of 2013 (SWRCB, 2018).

Similarly, stormwater drainage facilities are limited in the unincorporated areas of the County. Localized flooding frequently occurs and much of the county's existing drainage system is in poor condition and requires improvements that often exceed the capacity of local service districts. Many agricultural land uses employ on-site ditches that convey stormwater to existing roadside ditches. However, these ditches were never designed to serve as an informal flood control system but rather were intended to carry runoff from impervious surfaces (Yolo County, 2009).

Power in the County is generated from a variety of sources including fossil fuels, natural gas fields, hydroelectric facilities, solar energy, hydrogen fuel, and biofuels. Although there are no hydroelectric facilities within the county, the Yolo County Flood Control and Water Conservation District operates two hydroelectric plants both of which are located in Lake County. As discussed previously in Section 5.6 (Energy) the County, along with the cities of Woodland and Davis, formed the Valley Clean Energy (VCE) alliance and launched services in June of 2018 to provide electricity to customers located with the two cities and the unincorporated areas of the County. The mission of VCE is to deliver cost-competitive clean electricity, product choice, price stability, energy efficiency, and greenhouse gas emission reductions to its customers (Yolo County, 2024). VCE ensures the clean energy (such as wind and solar) is energized on

the electrical grid and PG&E delivers the electricity throughout the County. The nearest electrical transmission line to the Project site is a 60-kilovolt (kV) line located east of the site along CR 99 and runs north-south through the city of Woodland, connecting to another 60 kV line running east-west which connects Woodland to the community of Madison and the greater electrical grid network (PG&E, 2024a). The nearest natural gas pipeline is located along the western edge of the city of Woodland, running south along CR 98 from Interstate 5 (I-5), and terminating just south of West Main Street, approximately 1.7 miles north of the Project site (PG&E, 2024b).

AT&T is the primary provider of land line telephone service in Yolo County. The County is served by cell phone and wireless services from various providers, but there are gaps or poor reception in several of the unincorporated communities and remote rural areas.

There are two public facilities for solid waste and recycling in Yolo County: the Yolo County Central Landfill, and Esparto Convenience Center. The Yolo County Central Landfill is a 722-acre, Class III solid waste landfill that provides solid waste and recycling services. At the current waste disposal rate, the landfill's closure date is estimated as January 1, 2081. The Esparto Convenience Center is an 11-acre facility accepting residential municipal solid waste and recycling. The transfer station does not have an estimated operational life; it will be closed when it is no longer needed (Yolo County, 2009).

Regulatory Background

Federal Requirements

Federal Clean Water Act. The State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) are responsible for the regulation and enforcement of the water quality protection requirements of the federal Clean Water Act (CWA) and the state's Porter-Cologne Water Quality Control Act (Porter-Cologne). The National Pollutant Discharge Elimination System (NPDES) is the permitting program that allows point source dischargers to comply with the CWA and Porter-Cologne laws. This regulatory framework protects the beneficial uses of the state's surface and groundwater resources for public benefit and environmental protection. Protection of water quality could be achieved by the proposed Project by complying with applicable NPDES permits from the SWRCB or the Central Valley RWQCB.

State Requirements

Integrated Waste Management Act. The Integrated Waste Management Act of 1989 requires cities and counties to reduce, by 50 percent, the amount of solid waste disposed of in landfills by the year 2000 and beyond. To comply with the Integrated Waste Management Act, counties adopt regulations and policies to fulfill the requirements of the Act.

California's Green Building Standards Code (CALGreen) mandates locally permitted new residential and non-residential building construction, demolition, and certain additions and alteration projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous Construction and Demolition debris generated during the Project (CalRecycle, 2024).

Local Requirements

The Yolo County Code contains the recycling and diversion of construction debris regulations of the county. Section 6-16.05 states that 50 percent of construction and demolition debris generated from every applicable construction, renovation, or demolition project shall be diverted from going to landfills by using recycling, reuse, and diversion programs. These diversion requirements can be met by (a) taking all mixed or segregated construction and demolition debris to the Mixed Construction and Demolition

Debris Recycling Facility located at Yolo County Central Landfill (YCCL); or (b) source separating designated materials and directing them to recycling facilities, approved by the Division of Integrated Waste Management and taking the remainder (but no more than 50 percent weight or yardage) to YCCL for disposal.

The following relevant goals and policies are presented in the Yolo County General Plan Public Facilities and Services Element (Yolo County, 2009b):

- **Goal PF-11:** Support a flexible network of utility services to sustain state-of-the-art community livability and economic growth.
- **Policy PF-11.2:** Encourage expanded coverage and enhanced quality for communication technology, such as mobile connectivity, high-speed wireless internet access, and emergency communication systems.
- **Policy PF-9.8:** Require salvage, reuse or recycling of construction and demolition materials and debris at construction sites.

5.19.2. Environmental Impacts

(a) Would the project 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?

NO IMPACT. The temporary construction is scheduled to last approximately 90 to 120 days, with a labor force of approximately 6 people, who would likely be sourced locally. The proposed Project would create a new freestanding cell tower facility to better serve unincorporated Yolo County and the city of Woodland. New underground utilities would be extended into the Project site a distance of approximately 2,400 feet within a proposed 15-foot-wide utility easement. The utility easement would connect to an existing electric meter and pole transformer via an underground fiber and power service lines. The Project itself would not require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities. No impact would occur.

(b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

LESS THAN SIGNIFICANT IMPACT. Due to the limited disturbance and excavation activities required for the Project, a water truck would not be needed on-site during the construction phase. YSAQMD recommends that all construction areas be watered at least twice daily to control fugitive dust, with frequency based on factors such as the type of operation, soil, and wind exposure (YSAQMD, 2007). However, the small Project site disturbance footprint of 0.021 acre would not require excessive amounts of water for dust control. The Project would comply with all dust control measures required by the YSAQMD. Once construction is completed, water would not be required for the maintenance and operations of the cell tower. Therefore, a less than significant impact would occur.

(c) Would the project 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?

NO IMPACT. There is not a local wastewater treatment provider in this area of unincorporated Yolo County. During construction, the Project is required to provide portable toilet facilities onsite (29 CFR 1926.51) that would be temporary and removed upon completion of the cell tower construction. Additionally, the Project has no need for a permanent wastewater system because operation and maintenance of the facility is performed by employees spending about 10 to 15 minutes per month during each maintenance

check. Hence, the Project would not require the use of water or produce any wastewater that would require additional capacity by the wastewater treatment provider. No impact would occur.

(d) Would the project 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?

LESS THAN SIGNIFICANT IMPACT. No grading is required for the proposed Project, therefore there would be no excess soil. Due to the size of the Project, the amount of construction waste will be minimal. Furthermore, California's Green Building Standards Code (CALGreen) mandates locally permitted new residential and non-residential building construction, demolition and certain additions and alteration projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous Construction and Demolition debris generated during the Project (CalRecycle, 2024). The 722-acre capacity of the Yolo County Central Landfill would not be significantly impacted by the amount of waste materials for disposal generated as a result of construction activities. No solid waste would be generated as a result of operation or maintenance of the Project. Therefore, the Project would not generate solid waste in excess of State or local standards, in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

(e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

NO IMPACT. The California Integrated Waste Management Act of 1989, which emphasizes resource conservation through the reduction, recycling, and reuse of solid waste, requires that localities conduct a Solid Waste Generation Study and develop a Source Reduction Recycling Element. Yolo County prepared a County Integrated Waste Management Plan that includes a Source Reduction and Recycling Element, a Household Hazardous Waste Element, and a Non-disposal Facility Element. The proposed Project would operate in accordance with these applicable Solid Waste Management Policy Plans by recycling where feasible. As identified in Item (d) above, the disposal site serving the Project would have sufficient capacity to accommodate the Project's solid waste disposal needs, and the Project would not require the need for new or expanded landfill facilities. Therefore, the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste disposal limits and landfill capacities. No impact would occur.

5.19.3. Utilities and Service Impact Conclusions

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.20. Wildfire

WILDFIRE				
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

5.20.1. Setting

CAL FIRE has developed a Fire Hazard Severity Scale that uses three criteria to evaluate and designate potential fire hazards in wildland areas. The criteria include fuel loading (vegetation), fire weather (winds, temperatures, humidity levels, and fuel moisture controls), and topography (degree of slope). The Project is located just outside the limits of the city of Woodland, on the valley floor surrounded by agricultural land uses and would not be located in a Fire Hazard Severity Zone (CAL FIRE, 2024).

Regulatory Background

Fire season in Yolo County runs from May through October. Dry vegetation during this time period provides fuel for fires and can be exacerbated by hot north winds during periods of extremely low humidity. The County and municipalities fight a large number of vegetation fires primarily along highways and roadways. Local fire stations are responsible for their districts and as discussed in Section 5.15 (Public Services) the site is located within the Willow Oak Fire Protection District. Station 6, located at 17535 CR 97 in Woodland is the nearest fire station to the Project site. Drive time from Station 6 to the Project site would take approximately 10 minutes. Additionally, CAL FIRE has equipment and staff available in Yolo County during the fire season (Yolo County, 2009).

The Woodland Fire Department serves the community just north of the Project Site.

5.20.2. Environmental Impacts

(a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

NO IMPACT. The purpose of the telecommunication tower is to improve communication throughout the area, and thus, facilitate improved emergency access. Therefore, the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

(b) Would the project, 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?

LESS THAN SIGNIFICANT IMPACT. The proposed Project is located on the valley floor and contained within a parcel historically used for agricultural cultivation, with no sloping landscapes within the Project area. The surrounding area to the north, east, south, and west is flat agricultural land uses, while the area 530 feet further to the north consists of single-family residences in the city of Woodland. Construction equipment and vehicles used for foundation excavation, and tower installation would run on fossil fuels. The new telecommunications tower would be powered by a proposed underground power line connected to an existing transformer. The underground nature of this utility line would reduce the risk of fire. The operation of the facility would require the use of a 30-kW diesel generator, placed on a precast foundation, which would be used during emergency conditions to power the cell tower, along with a proposed HVAC unit, which would be installed on the exterior of the walk-in cabinet. No extra fuel for the generator, which has a belly tank capacity of 190 gallons, would be stored on-site.

The project site is not located in a Fire Hazard Severity Zone, indicating that it has a low wildfire risk (CAL FIRE, 2024). The fire risk would be minimized because the area surrounding the Project site has a low wildfire risk, there would be no extra fuel stored on-site, and the Project would not be staffed. Therefore, there would not be Project occupants to expose to pollutants or wildfire. Impacts would be less than significant.

(c) Would the project 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?

NO IMPACT. The proposed Project plans include improvements to the existing gravel access road, currently used for farming activities, within a 15-foot-wide non-exclusive access and utility easement. The gravel access road would be improved by adding road base/aggregate crushed rock to the existing surface, then compacting. This would allow emergency services, including fire, to access the site in the case of a fire or other emergency. Additionally, an underground power line would be installed to bring power to the proposed tower location from a nearby transformer approximately 200 feet away and within the proposed 15-foot-wide easement. The construction associated with the road improvements would be minor, and the underground nature of the power line would not increase the risk of fire that may result in temporary or ongoing impacts to the environment. Additionally, the Project site is not located within or near a state responsibility area or very high fire hazard severity zone. Therefore, there would be no required installation or maintenance associated infrastructure that could exacerbate fire risk. There would be no impact.

(d) Would the project 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?

NO IMPACT. As discussed in Section 5.7 (Geology and Soils), the proposed Project is not located in an area susceptible to landslides and there are no slopes within in the Project vicinity (Yolo County, 2009). There would be no grading required for the 0.021-acre footprint of the tower's foundation. The Project is approximately 530 feet away from the nearest residence to the north within the city of Woodland and is primarily surrounded by agricultural cultivation. The Project would have no impacts related to risks associated with runoff, post-fire slope instability, or drainage changes.

5.20.3. Wildfire Impact Conclusions

The proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan or exacerbate fire risks due to slope or prevailing winds. The proposed Project would not require the installation or maintenance of infrastructure that could exacerbate fire risks, not

would the Project expose people or structures to significant risks as a result of post-fire slope instability or drainage changes. No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

5.21. Mandatory Findings of Significance

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Significance criteria established by CEQA Guidelines, Appendix G.

(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?

LESS THAN SIGNIFICANT IMPACT. Based on the information provided in this Initial Study and the standard measures that are part of the Project or otherwise required by law, the Project would not degrade the quality of the environment.

As analyzed in this Initial Study, Biological Resources would be less than significant due to implementation of the Avoidance and Minimization Measures required by the Yolo County Habitat Conservation Plan/ Natural Community Conservation Plan and standard conditioned requirements for Biological Resources. Cultural Resources would also be less than significant due to compliance with the Yolo County Code of Ordinances and other County standards along with General Plan actions regarding cultural resource inventories and paleontological artifact encounters (Actions CO-A63 and CO-A65 of the Conservation and Open Space Element). Additionally, by complying with industry standard BMPs to minimize erosion associated with the construction of the cell tower, the Project would not have the potential to substantially degrade the quality of the environment. Nor would the Project 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 inadvertently disturb unknown important examples of the major periods of California history or prehistory. Impacts are found to be less than significant and where the potential for a significant impact exists, the AMMs and standard requirements are to be included into the Project conditions of approval to ensure any impacts would be less than significant.

(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, effects of other current projects, and the effects of probable future projects.)

LESS THAN SIGNIFICANT IMPACT. Yolo County has a strong focus on protecting its agricultural and open space reserves, commodities, and identity. The County resists urbanization with the goal of maintaining its rural character. The 2030 Countywide General Plan outlines the following strategies for the development vision for growth in the coming years:

1. Modest managed growth within specified existing unincorporated communities, where accompanied by improvements to existing infrastructure and services, as well as by suitable new infrastructure and services;
2. Opportunities for revenue-producing and job-producing agricultural, industrial, and commercial growth in limited locations and along key transportation corridors;
3. Thresholds that allow for effective and efficient provision of services, consistent with rural values and expectations;
4. New emphasis on community and neighborhood design requirements that reflect “smart growth” principles and complement the character of existing developed areas.

As discussed in preceding Sections 5.1 through 5.20, any potential impacts of the proposed Project would occur during construction, with few, if any, operational effects. Because the construction-related impacts of the Project would be temporary and localized, they would have the potential to combine with similar impacts of other projects only if they occur at the same time and in close proximity. Given the proximity of the city of Woodland to the Project site, it is possible that projects within the city’s sphere of influence (SOI), when combined with the proposed Project, could result in cumulative impacts. However, development projects within Woodland, including the Woodland Research and Technology Park Specific Plan located in the south-central region of the city, were not included in this analysis because they are part of the overall urban development already planned for the city and would be consistent with existing land use plans and policies. Therefore, their contribution to cumulative impacts is not expected to be adverse.

Based on the analysis provided in this Initial Study, including the discussion of Section 5.11 (Land Use and Planning) indicating that the proposed cell tower is permitted with the approval of a Major Use Permit on lands zoned for agriculture, and with the implementation of the standard requirements and conditions of approval, the Project would have no significant cumulative impacts. Considering the development plans of the County aiming to limit growth, the size of the Project impact area, and its construction in response to existing communication infrastructure needs, the Project would not have significant cumulative impacts with other approved or pending projects. Additionally, the relatively short construction time and minimal additional energy load from the Project would not contribute to significant cumulative impacts. Therefore, the impact would be less than significant.

(c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

LESS THAN SIGNIFICANT IMPACT. As described in this Initial Study, the Project would not cause substantial adverse effects on human beings, directly or indirectly. Most impacts on the environment are less than significant and where the potential for a significant impact exists, the Applicant has proposed measures that would be included in the Project itself to reduce the impact to less than significant. Consequently, preparation of an Environmental Impact Report is not required.

6. AUTHORS AND REVIEWERS

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