

ENVIRONMENTAL INITIAL STUDY & MITIGATED NEGATIVE DECLARATION

Use Permit 25-0002
The Towers of California, LLC

April 9, 2026

ENVIRONMENTAL INITIAL STUDY &
MITIGATED NEGATIVE DECLARATION
WITH
References and Documentation

Prepared by
SHASTA COUNTY DEPARTMENT OF RESOURCE MANAGEMENT
PLANNING DIVISION
1855 Placer Street, Suite 103
Redding, California 96001

**SHASTA COUNTY
ENVIRONMENTAL CHECKLIST FORM
INITIAL STUDY & MITIGATED NEGATIVE DECLARATION**

- 1. Project Title:**
Use Permit 25-0002 (Towers of California)
- 2. Lead Agency Name and Address:**
Shasta County Department of Resource Management, Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001-1759
- 3. Contact Person and Phone Number:**
Marco Dominguez, Assistant Planner (530) 225-5532
- 4. Project Location:**
The project is in the southwestern Shasta County community of Happy Valley at 6765 Oak Street, Anderson, CA, which is situated approximately 0.3 miles north of the intersection of Oak Street and Hawthorne Avenue (Assessor's Parcel Number 205-310-012).
- 5. Applicant Name and Address:**
The Towers of California LLC
750 Park of Commerce Dr, #200
Boca Raton, FL 33487
- 6. General Plan Designation:**
Rural Residential A (RA)
- 7. Zoning:**
Rural Residential-Mobile Home (R-R-T)
- 8. Description of Project:**
The project is a use permit application to construct, operate, and maintain an unmanned commercial wireless telecommunications facility within a 50-foot by 50-foot ground lease area on an approximately 10-acre parcel that is developed with a single-family residence and associated residential accessory structures. The lease area would be graded, and enclosed by a 6-foot-tall chain-link fence with faux ivy screening. Proposed improvements include a 130-foot-tall monopine tower with three four-sector antenna mounts designed to accommodate up to twelve (12) antennas, and twelve (12) remote radio units (RRU's). Other improvements include one 6-foot microwave antenna, one (1) 30-kilowatt backup generator with a 216-gallon diesel fuel tank on a 3-foot-8-inch by 7-foot-6-inch concrete slab, three (3) ground equipment cabinets, one (1) equipment canopy, and other ancillary equipment. The tower would allow for two (2) future co-location sites for other carriers, and surplus ground lease space would be reserved for future carriers to co-locate at the facility. The lease area would be illuminated by three (3) L.E.D. service lights with motion sensor control directed toward the proposed ground equipment. The tower will not be lit.

Improvements proposed outside the lease area include 1,014 feet of trenching for underground utilities, installation of an above ground utility connection to serve the facility, construction of an approximately 874-foot long 12-foot-wide graveled access driveway with a culvert and a 12-foot wide gate with a Knox Box, and a PG&E transformer. Excavators, backhoes, bulldozers, trenchers, dump trucks, cranes and similar equipment could all be used for site preparation activities and construction. Approximately 0.5 acres of grading, trenching, excavation and backfilling involving approximately 395 cubic yards of cut, 250 cubic yards of fill, will be necessary to install facility structures,

ancillary equipment, fencing, utilities (electricity and fiber optic), and to construct the driveway. Construction of the driveway and wireless telecommunications facility requires the removal of approximately sixteen (16) oak trees.

The applicant is requesting an exception from the landscape requirements of the Shasta County Code which requires landscaping to be provided and maintained for the life of the facility to screen any ground structures or equipment.

9. Surrounding Land Uses and Setting:

The project site is an approximately 10-acre property that is developed with a one-family residence and detached barn. The 50-foot by 50-foot project lease area is located on the east side of the property approximately 550 feet east of the existing residence.

Surrounding land uses consist primarily of low-density residential development, including developed residential lots to the north, east, west and south of the project site. All adjacent lands are designated as Rural Residential A (RA) by the Shasta County General Plan and are in the Rural Residential (R-R) and Rural Residential combined with Mobile Home (R-R-T) zone districts. The project site is relatively flat with vegetation consisting of pockets of blue oak/foothill pine forest where the site has not been disturbed by existing residential uses. There is a pond on site and an ephemeral stream on the eastern portion of the subject property. On-site drainage sheet flows in a southeasterly direction.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

Shasta County Building Division
Shasta County Fire Department
Shasta County Department of Public Works
Federal Communications Commission

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Public Resources Code (PRC) Section 21080.3.1, the Wintu Tribe of Northern California & Toyon-Wintu Center and the Paskenta Tribe of Nomlaki Indians (Tribes) filed, and Shasta County received a request for formal notification of proposed projects within an area of Shasta County that is traditionally and culturally affiliated with these Tribes. Pursuant to PRC Section 21080.3.1, the Department of Resource Management sent a certified letter to notify and the Wintu Tribe of Northern California & Toyon-Wintu Center and the Paskenta Tribe of Nomlaki Indians that the project was under review and provided the Tribes 30 days from the receipt of the letter to request formal consultation on the project in writing. Certified mail records indicate that the notification letters was received by both Tribes on Monday, December 1, 2025. As of Thursday, January 1, 2026, no request for consultation on the project was received from either Tribe. Therefore, the requirements of AB52 have been met and no AB52 project consultation with the Tribe is required.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of the 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.

Copies of the Initial Study and related materials and documentation may be obtained at the Planning Division of the Department of Resource Management, 1855 Placer Street, Suite 103, Redding, CA 96001. Contact Marco Dominguez, Assistant Planner at (530) 225-5532.



Marco Dominguez
Assistant Planner

04/09/2026
Date



Sean Ewing
Director of Resource Management

4/9/26
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except **DN**o ImpactC answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A **DN**o ImpactC answer is adequately supported if all the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A **DN**o ImpactC answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less-than-significant with mitigation, or less-than-significant. **DP**otentially Significant ImpactC is appropriate if there is substantial evidence that an effect may be significant. If there are one or more, **DP**otentially Significant ImpactC entries when the determination is made, an EIR is required.
- 4) **DN**egative Declaration: **Less-than-significant With Mitigation IncorporatedC** applies where the incorporation of mitigation measures has reduced an effect from **DP**otentially Significant ImpactC to a **DL**ess-than-significant ImpactC. The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from Section XVIII, **DE**arlier Analyses,C may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) **Earlier Analysis Used.** Identify and state where they are available for review.
 - b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures:** For effects that are **DL**ess-than-significant with Mitigation Measures Incorporated,C describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. General Plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) **Supporting Information Sources:** A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify the following:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less-than-significant.

I. 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?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				X
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 a 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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and Photo Simulations prepared by Draft Link (October 2025), the following findings can be made:

- a-b) The proposed tower is a 130-foot tall monopine structure. Photo simulations of the proposed structure (prepared by DraftLink) were provided from seven total vantage points, three vantage points are from the subject parcel looking northwest, northeast, and southeast towards the project site. The remaining four are from public vantage points; the first from Oak Street approximately 900 feet southwest of the lease area looking northeast; the second from Oak Street approximately 900 feet west of the lease area looking east; the third on the corner of Oak Street and Acero Drive approximately 950 feet northwest of the lease area looking to the southeast; and the fourth from Acero Drive approximately 325 feet north of the lease area looking south. The proposed monopine is visible from public vantage points 1, 2, and 4 but not 3 where the view is obstructed by existing trees. The topography in the vicinity of the project site is relatively flat and distant views are fully or partially obstructed by conifer trees. No scenic vista is visible from public vantage points in the vicinity based on photo simulations submitted with the application and therefore the project would not adversely affect a scenic vista.
- c) Shasta County Zoning Plan Section 17.88.282.E establishes standards that are protective of the existing visual character and quality of the site and its surroundings, such as the requirement that commercial wireless telecommunication facilities shall not have a significant adverse effect on a scenic vista or significantly impact the existing visual character or quality of the site and its surroundings as verified by an environmental document or exemption prepared in accordance with the requirements of the California Environmental Quality Act (CEQA). Section 17.88.282.E also establishes landscaping requirements to screen any ground structures or equipment for the life of the project, setback requirements, and a requirement prohibiting wireless telecommunication facilities to be placed within one thousand five hundred feet of an existing wireless telecommunication facility unless environmental documentation verifies that a concentration of towers in close proximity will not have a cumulative adverse impact on the visual character or quality of the site and its surroundings.

The proposed monopine would not be located within 1,500 feet of an existing wireless telecommunication facility. As proposed, the monopine tower complies with the minimum setback requirements. The view of the proposed lease area from Oak Street and Acero Drive is partially obstructed by existing vegetation and development within the project site. The applicant is requesting an exception to the landscaping standards and is proposing a six-foot-tall chain link fence with faux ivy screening that together with existing vegetation and development on the project site, will effectively shield the ground structures and equipment from view. The conditions of approval for the project require that the fence and screening will be maintained for the life of the project.

Blue Oak woodland is the predominant vegetation community in the vicinity of the project with inclusions of blue oak/foothill pine forest with these vegetation communities being interspersed with and disturbed by exiting low rise residential development on rural parcels. The photo simulations demonstrate that the tower would be constructed to resemble pine trees commonly found in blue

oak/foothill pine forests with branching spanning the height of the tower and replicating a cylindrical pine tree having no less than 3 branches per lineal foot starting at not less than 15 feet above ground. The length of the artificial branches will exceed that of the antenna arrays by a minimum of one foot and the density of the artificial foliage will be such that the visibility of the antenna arrays are secondary to that of the monopine. The antenna will be concealed with pine needle socks and the pole will be covered with simulated bark. Due to the proposed monopine design of the tower, the proposed screened fencing and general standards for wireless telecommunication facilities in the Shasta County Zoning Plan, the proposed wireless facility would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, potential impacts of the project on the existing visual character or quality of public views of the site and its surroundings would be less-than-significant.

- d) The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in a non-urbanized area. The applicant proposes three service lights; one located below the equipment canopy directed to the northeast and two on the H-Frame directed to the north. The conditions of approval for the project would include a standard condition requiring compliance with Section 17.88.282.E.5 of the County Zoning Plan which requires external structure and area lighting to be activated and controlled by motion sensors. No other lighting is proposed. Therefore, potential impacts of the project from new sources of substantial light or glare on day or nighttime views in a non-urbanized area would be less-than-significant.

Mitigation/Monitoring: None proposed.

II. <u>AGRICULTURE AND FORESTRY RESOURCES:</u> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or 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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The subject property is not identified as Prime Farmland, Unique Farmland, or Statewide Importance on the map titled Shasta County Important Farmland 2020.
- b) Neither this property nor the surrounding properties are zoned for agricultural use nor are they in a Williamson Act Contract.
- c-e) The project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)). The project site is not forest land or timberland because there are not commercial species of timber present within the property. The property is not in the Timberland Production zone district. The site is not located in an area of significant agricultural soils and is not currently used for agricultural purposes.

Mitigation/Monitoring: None proposed.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	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?				X
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?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Discussion: Based on related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a-b) The project would not conflict with or obstruct implementation of the 2021 Attainment Plan for the Northern Sacramento Valley Planning Air Basin as adopted by Shasta County, or any other applicable air quality plan. The telecommunications facility proposes a backup generator which would only run during power outages. The project would have impacts on air quality during construction, and during infrequent maintenance visits, infrequent back-up generator operations during power outages and periodic “exercise” cycling.

The NSVPA Air Quality Attainment Plan (2021) designates Shasta County as an area of Nonattainment with respect to the ozone California ambient air quality standards. Nitrogen oxides (NOx) are a group of highly reactive gasses and are also known as "oxides of nitrogen." Because NOx is an ingredient in the formation of ozone, it is referred to as an ozone precursor. NOx is emitted from combustion sources such as cars, trucks and buses, power plants, and off-road equipment. Construction equipment and activities associated with making probable improvements would generate air contaminants, including oxides of nitrogen (NOx), reactive organic gases (ROG), carbon dioxide (CO2) and particulate matter (PM10), in the form of engine exhaust and fugitive dust. However, the emissions emitted during construction would be limited and temporary. The Shasta County AQMD, Rule 3:28, is intended to limit emissions of NOx and carbon monoxide (CO) from stationary internal combustion engines. Generators that exceed a 50-brake horsepower (bhp) engine rating are subject to this rule. The proposed 30-kilowatt backup generator with a 216-gallon diesel fuel tank would have a 40-brake horsepower engine rating and would therefore not be subject to this rule and would not require a permit from the AQMD. Any future replacement generator that exceeds 50-brake horsepower would be subject to this rule and would require a permit from the AQMD.

In addition, the Shasta County General Plan requires Standard Mitigation Measures (SMMs) or Best Available Mitigation Measures (BAMMs) on all discretionary land use applications as recommended by the AQMD in order to mitigate both direct and indirect emissions of non-attainment pollutants. With the application of SMMs and BAMMs, in combination with the limited scope of improvements, infrequent maintenance visits, the project will not 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 and would not conflict with or obstruct implementation of the NSVPA Air Quality Attainment Plan (2021) as adopted by Shasta County, or any other applicable air quality plan.

- c-d) The facility would not be located in an area where substantial numbers of people live or work. The nearest sensitive receptors are a residence located on the neighboring property approximately 200 feet to the east and a residence on an adjacent property approximately 320 feet to the west. Trenching and backfilling for the electric utility and fiber optic cable would occur on a temporary basis approximately 150 feet away from the onsite residence. Substantial pollutant and odor concentrations are not anticipated due to the limited scope and duration of construction, and the implementation of SMM. Post-construction, the wireless communications facility would be unmanned and require only infrequent maintenance visits. As identified above, the proposed 30-kilowatt backup generator with a 216-gallon diesel fuel tank would operate infrequently during power outages and periodic “exercise” cycling. As a result, exposure of sensitive receptors or a substantial number of people to substantial pollutant concentrations and/or other emissions would be less-than-significant.

Mitigation/Monitoring: None proposed.

IV. <u>BIOLOGICAL RESOURCES:</u> Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Have a substantial 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?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
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?			X	
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the

project, and observations on the project site and in the vicinity, the following findings can be made:

- a-b) The subject property is developed with residential uses and continues to be disturbed by existing residential uses. The project site is relatively flat with vegetation consisting of pockets of blue oak/foothill pine forest where the site has not been disturbed by existing residential uses. The project will be constructed on the eastern portion of the parcel in an existing clearing to the northwest of the pond approximately 161 feet from the eastern property line. Project related construction activities include 1,014 feet of trenching, construction of an approximately 874-foot long 12-foot-wide graveled access driveway, and removal of sixteen (16) trees; eleven (11) to construct the driveway and five (5) to install the telecommunications facility. The location of the proposed driveway is along the northern property boundary, next to the neighboring property's driveway. This area is mostly clear of trees and appears to be maintained that way by the landowner. The trees to be removed in this area would occur in a linear fashion just along the edge of the existing clearing. The remaining trees to be removed are clustered on the northwest edge of the lease area.

Tree canopy coverage on the eastern portion of the subject property is approximately 50%. Due to the limited number and the location of the subject trees, the proposed tree removal would not significantly reduce the canopy coverage or abundance of oak trees on the subject parcel or negatively impact natural regeneration, utilization of the habitat by wildlife, or cause fragmentation or loss of connectivity of oak woodland habitat.

Lighting from the project is limited to three and down-directed service lights that would each be oriented towards equipment service areas inside the lease area. The conditions of approval for the project would include a standard condition requiring compliance with section 17.88.282.E.5 of the Shasta County Zoning Plan, requiring external structure and lighting to be activated and controlled by motion sensors. No other lighting is proposed. While lighting has been shown to have adverse effects on wildlife and plant species, the minimal lighting proposed by the project and because lighting would be motion-sensor-controlled, impacts from lighting on wildlife or plants are considered to be less-than-significant.

Due to the disturbed nature of the project site, a protocol-level biological assessment was not completed for the project. Staff completed a desktop review of the California Natural Diversity Database (CNDDDB) was completed, and the project site is within the known Crotch's Bumblebee range. No other known special status species were identified within one-half mile of the project site. However, the subject property is partially wooded with an understory of shrubs and grasses in areas where residential development is absent, and nesting birds and raptors and various species of bats could potentially be present in or be utilizing existing vegetation in the within and/or in vicinity of the project site at the time of construction. In addition, although the project will be constructed in a previously-cleared and disturbed portion of the subject parcel, nesting birds may be utilizing the project site during the nesting season, and project related disturbance could therefore potentially impact nesting birds that may be present when construction is initiated. Due to the potential for nesting birds, raptors and/or bats to be present in the vicinity of the project during construction, including grading and tree removal activities, Mitigation Measures IV.a.1-IV.a.2 are recommended to avoid potentially significant impacts to nesting birds, raptors and/or bat species that are present in the project vicinity.

The project site is located within the range of the Crotch's Bumble Bee (*Bombus Crotchii*) according to CDFW Crotch's Bumble Bee Range Map, which is a candidate species for listing as endangered in California. Crotch's Bumble Bees may inhabit woodlands, grasslands, shrublands, agricultural lands and urban landscapes. Therefore, potential suitable habitat may exist on site for the species. Inadvertent impacts to bumble bees, if present, could occur during project construction and operations, and would be significant if they are present on-site and removed for development or project operations. Mitigation Measure IV.a.3 recommends avoidance and minimization measures to avoid potential impacts to bees, if present during project related disturbance.

- c) According to the United States Department of Agriculture, Natural Resources Soil Conservation Service Web Soil Survey, the underlying soil type in the location of the lease area is Red Bluff Gravelly Loam, Moderately deep, 0-3 percent slopes (RcA) and Red Bluff Loam, 0 to 3 percent slopes, MLRA 17, moist (RbA) in the location of the proposed driveway. While these soil types are classified as predominantly nonhydric, fan remnants, alluvial plains and vernal pools can be found where there are channels and depressions in the topography. There is a freshwater pond and a freshwater ephemeral drainage located on the eastern portion of the subject parcel. The proposed 50-foot by 50-foot lease area is located in an existing clearing 60 feet from the northwest edge of the pond and approximately 80 feet from the ephemeral drainage and is approximately three (3) feet in elevation above the drainage. The area between the proposed lease area and the freshwater pond and seasonal drainage is vegetated and is not proposed to be disturbed during construction. Stockpiling of materials is proposed on the western side of the lease area. Approval of a grading permit is necessary to construct the facility. Erosion and sediment control measures will be required as part of that permit to avoid discharge of sediment laden runoff from the lease area and the proposed driveway. With conformance to these requirements and due to the distance between the proposed construction and the freshwater pond and ephemeral drainage and the vegetated nature of the land between the lease area and the wetland features, the project would not have a substantial adverse effect on any wetlands through direct removal, filling, hydrological interruption or other means.

- d) The project would not interfere with any native resident or migratory fish or wildlife species, nor impede the use of native wildlife nursery sites (see also section a-b) above.
- e) The project would not conflict with any ordinances or policies which protect biological resources.
- f) No habitat conservation plans, or other similar plans have been adopted for the project site or project area.

Mitigation/Monitoring: With the following mitigation measures, the impacts on biological resources would be less-than-significant.

IV.a.1) The project proponent shall implement the following mitigation measures to avoid significant impacts to nesting birds and/or raptors protected under Fish and Game Code sections 3503 and 3503.5:

- A. Conduct vegetation removal and other ground-disturbance activities associated with construction from September 1 through January 31, when birds are not nesting; or
- B. If vegetation removal or ground disturbance activities occur during the nesting season (February 1 through August 31), a pre-construction nesting survey shall be conducted by a qualified biologist within 14 days of vegetation removal or construction activities. If an active nest is located during the preconstruction surveys, avoidance and minimization measures should be implemented in accordance with recommendations from a qualified biologist. Avoidance and minimization measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists. The results of the pre-construction surveys shall be sent electronically to CDFW at R1CEQARedding@wildlife.ca.gov.

IV.a.2) The project proponent shall implement the following mitigation measures to avoid significant impacts to bat species protected under Fish and Game Code section 4150:

- A. Trees that contain cavities, crevices, or exfoliated bark have high potential to be used by various bat species. If land alteration and/or removal of trees with cavities, crevices, or exfoliated bark will occur, a thorough survey should be conducted by a qualified biologist to determine if bat roosting opportunities are present prior to tree removal.
- B. Trees with 12" diameter at breast height (DBH) or greater with potentially suitable roosting features should be clearly marked by a qualified biologist and may be removed as follows:
 - i. To avoid impacts to roosting bats, removal of trees should occur only during the following time frames and subject to the following weather conditions, or as otherwise approved/recommended by a qualified biologist:
 - Between March 15 and April 30, and between August 15 and October 1; and
 - Between October 2 and March 14 when evening temperatures are above 45°F, and no more than ½" of rainfall within a 24-hour period prior to tree removal.
 - ii. Trees shall be removed using a two-step process to allow bats the opportunity to abandon the roost prior to removal. The two-step removal process is as follows:
 - Day 1: Remove small-diameter trees, brush, and non-habitat features of large trees (branches without cavities, crevices, or exfoliating bark) to create noise and vibration disturbance on the tree and to alter the air flow and temperature around the roost feature thus encouraging bats to vacate roost features on their own. The tree shall then be left for 24 hours to allow the bats to move to another roost site. No excavators, grinders, or other heavy equipment should be used for first day trimming of bat habitat trees.
 - Day 2: If bats may be in branches that can be removed from the tree and set aside, cut the branches off intact and set them upright against trees away from the Project area to allow any bats present to passively escape. Then, remove the remainder of the tree.

IV.a.3) The project proponent shall implement the following mitigation measures to avoid significant impacts to special-status bumble bees:

- A. Conduct construction activities outside of the queen flight season, colony active period, and gyne flight season for the Crotch's bumble bee (December 1 and January 31); or
- B. Prior to issuance of a grading or building permit, a qualified biologist shall conduct a biological assessment to determine whether suitable habitat is present within the project site. If suitable habitat is determined to be present within the project site and land alteration, vegetation removal, and/or construction activities cannot occur between December 1 and January 31, a qualified biologist shall conduct surveys for special status bumble bees prior to the start of construction. Three on-site surveys shall be conducted two to four weeks apart, weather depending, and when floral resources are present. If no suitable habitat is determined to be present, construction may occur throughout the year. If surveys are required, they shall be conducted in accordance with the following protocols:
 - i. Species identification and photographic vouchers shall be submitted to CDFW and experts from the Bumble Bee Watch for species verification by an experienced taxonomist prior to the start of land modification and/or vegetation removal.
 - ii. If special-status bumble bees are detected, a nesting survey as the protocol is described in CDFW's *June 2023 Survey Considerations for CESA Candidate Bumble Bee Species*, shall be performed throughout the project area.
 - iii. If special-status bumble bees and/or their nests are detected, the potential for "take" as defined by Fish and Game Code section 86 shall be analyzed and quantified. If suitable avoidance and minimization measures to fully avoid take are not feasible, CDFW shall be consulted regarding the need for take authorization pursuant to Fish and Game Code section 2081(b). Otherwise, suitable avoidance and minimization measures to fully avoid take should be employed, and/or the formulation of a Mitigation and Monitoring Plan should be developed for impacts to suitable Crotch's bumble bee habitat.
 - iv. All data, including negative and/or positive observations, shall be submitted to the CNDDDB and Bumble Bee Watch.

<u>V. CULTURAL RESOURCES</u> E Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to *15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to *15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, and observations on the project site and in the vicinity, the following findings can be made:

- a-b) Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and commented that the project area is in an area considered to be low sensitivity for cultural resources. No cultural resources have been recorded within a half-mile and no historical resources were inadvertently discovered during the development of the existing residence and accessory buildings that currently occupy the property. Therefore, the project would not cause a substantial adverse change in the significance of an historical and/or archeological resource.
- c) The project site is not on or adjacent to any known cemetery or burial area. Therefore, there is no evidence to suggest that the project would disturb any human remains.

Although there is no evidence to suggest that the project would result in any significant effect to historical, archeological, paleontological, or unique geologic resource, or human remains, there is always the possibility that such resources or remains could be encountered. Therefore, if, in the course of development, any archaeological, historical, or paleontological resources are uncovered, discovered or otherwise detected or observed, construction activities in the affected area shall cease and a qualified archaeologist shall be contacted to review the site and advise the County of the site's significance. If the findings are deemed significant by the Environmental Review Officer, appropriate mitigation shall be required. required prior to any resumption of

work on the project. Additionally, Pursuant to California Health and Safety Code Section 7050.5, 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 until the coroner has determined if the remains are subject to his or her authority. If the coroner determines that human remains are not subject to his or her authority and recognizes or has reason to believe the remains to be those of a Native American, he or she shall contact the NAHC within 24 hours.

Mitigation/Monitoring: None proposed.

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

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. During construction there would be temporary consumption of energy resources required for the movement of equipment and materials. Compliance with local, State, and federal regulations (e.g., limit engine idling times, requirement for the recycling of construction debris, etc.) would reduce and/or minimize short-term energy demand during the project's construction to the extent feasible, and project construction would not result in a wasteful or inefficient use of energy. During operation of the completed project, there are no unusual project characteristics or processes that would require the use of equipment that would be more energy intensive than is used for comparable projects, or the use of equipment that would not conform to current emissions standards and related fuel efficiencies.
- b) The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. State and local agencies regulate the use and consumption of energy through various methods and programs. As a result of the passage of Assembly Bill 32 (AB 32) (the California Global Warming Solutions Act of 2006) which seeks to reduce the effects of Greenhouse Gas (GHG) Emissions, a majority of the state regulations are intended to reduce energy use and GHG emissions. At the local level, the County's Building Division enforces the applicable requirements of the Energy Efficiency Standards and Green Building Standards in Title 24.

Mitigation/Monitoring: None proposed.

<u>VII. GEOLOGY AND SOILS</u> E 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: 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 Publications 42.			X	

<u>VII. GEOLOGY AND SOILS</u> E Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
ii) Strong seismic ground shaking?				
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?				
b) Result in substantial soil erosion or the loss of topsoil?			X	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				X
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?				X
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 waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i, ii, iii) Rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction;

According to the Alquist-Priolo Earthquake Fault Zoning Maps for Shasta County, there is no known earthquake fault on or near the project site. The entire County is in Seismic Design Category D. According to the Seismic Hazards Assessment for the City of Redding, California, prepared by Woodward Clyde, dated July 6, 1995, the most significant earthquake at the project site may be a background (random) North American crustal event up to 6.5 on the Richter scale at distances of 10 to 20 km. Wireless telecommunications towers are not specifically designated as a critical or high-risk facility in the California Building Code, nor are they defined as such by the Shasta County zoning code. The wireless telecommunication facility would be constructed in accordance with the seismic standards and requirements of the California Building Code, including preparation of a soils report, if deemed necessary based on site specific soil conditions. Therefore, the potential impacts due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, would be less-than-significant.

iv) Landslides.

The project is not located at the top or toe or in the vicinity of any significant topographic feature that may be susceptible to landslides.

- b) The project would not result in substantial soil erosion or the loss of topsoil.

The United States Department of Agriculture, Natural Resources Soil Conservation Service Web Soil Survey, identified the soils on the subject parcel as Red Bluff loam 0 to 3 percent slopes, MLRA 17, moist (RbA), Red Bluff gravelly loam, moderately deep 0 to 3 percent slopes (RcA), and Red Bluff gravelly loam, moderately deep, 3 to 8 percent slopes (RcB). Soils within the lease area are Red Bluff gravelly loam RcA, and the proposed driveway will be located on the Red Bluff loam (RbA). These soils are classified as having slight hazard of erosion, indicating that erosion is unlikely under ordinary climatic conditions. The project site is relatively flat. cuts and fills are limited to 395 cubic yards of cut and 251 cubic yards of fill, and the proposed area of disturbance is approximately 0.5 acres. A grading permit is required prior to any grading activities. The grading permit includes requirements

for erosion and sediment control, including retention of topsoil. Due to the limited slope, the low erodibility rating of the underlying soil, and the limited disturbance area, potential impacts of the project on soil erosion or with respect to the loss of top soil would be less-than-significant.

- c) The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The property is relatively flat. The project site is not located at the top or toe of any significant slope. Based on records of construction in the area, there is no evidence to support a conclusion that the project is on a geologic unit or soil that is unstable.
- d) The Red Bluff loam (RbA) and the Red Bluff gravelly loam, (RcA) soils where construction will occur have a slight hazard of erosion, indicating that erosion is unlikely under ordinary climatic conditions. The Red Bluff gravelly loam (RcA) where the tower will be constructed is somewhat limited due to its shrink-swell potential rating (0.50). The linear extensibility for shrink swell potential is therefore moderately favorable for construction. Neither soil types is classified as expansive soil. The California Building Code requires a geotechnical report for commercial structures which would recommend appropriate construction methods and/materials to address any limitations of the onsite soils.
- e) The project does not require the use of septic tanks or alternative wastewater disposal systems.
- f) The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Mitigation/Monitoring: None proposed.

VIII. <u>GREENHOUSE GAS EMISSIONS:</u> 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?				X
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

a, b) In 2005, the Governor of California signed Executive Order S-3-05, establishing that it is the State of California's goal to reduce statewide greenhouse gas (GHG) emission levels. Subsequently, in 2006, the California State Legislature adopted Assembly Bill AB 32, the California Global Warming Solutions Act. In part, AB 32 requires the California Air Resources Board to develop and adopt regulations to achieve a reduction in the State's GHG emissions to year 1990 levels by year 2020.

California Senate Bill 97 established that an individual project's effect on GHG emission levels and global warming must be assessed under CEQA. SB 97 further directed that the State Office of Planning and Research (QPR) develop guidelines for the assessment of a project's GHG emissions. Those guidelines for GHG emissions were subsequently included as amendments to the CEQA Guidelines. The guidelines did not establish thresholds of significance and there are currently no state, regional, county, or city guidelines or thresholds with which to direct project-level CEQA review. As a result, Shasta County reserves the right to use a qualitative and/or quantitative threshold of significance until a specific quantitative threshold is adopted by the state or regional air district.

The City of Redding currently utilizes a quantitative non-zero project-specific threshold based on a methodology recommended by the California Air Pollution Officers Association (CAPCOA) and accepted by the California Air Resources Board. According to CAPCOA's Threshold 2.3, CARB Reporting Threshold, 10,000 metric tons of carbon-dioxide equivalents per year (mtCO₂eq/yr) is recommended as a quantitative non-zero threshold. This threshold would be the operational equivalent of 550 dwelling units, 400,000 square feet of office use, 120,000 square feet of retail, or 70,000 square feet of supermarket use. This approach is estimated to capture over half the future residential and commercial development projects in the State of California and is designed to support the goals of AB 32 and not hinder it. The use of this quantitative non-zero project-specific threshold by Shasta County, as lead agency, would be consistent with certain practices of other lead agencies in the County and throughout the State of California.

The United States Environmental Protection Agency (EPA) identifies four primary constituents that are most representative of the GHG emissions. They are:

- Carbon Dioxide (CO₂): Emitted primarily through the burning of fossil fuels. Other sources include the burning of solid waste and wood and/or wood products and cement manufacturing.

- Methane (CH⁴): Emissions occur during the production and transport of fuels, such as coal and natural gas. Additional emissions are generated by livestock and agricultural land uses, as well as the decomposition of solid waste.
- Nitrous Oxide (N₂O): The principal emitters include agricultural and industrial land uses and fossil fuel and waste combustion.
- Fluorinated Gases: These can be emitted during some industrial activities. Also, many of these gases are substitutes for ozone-depleting substances, such as CFC's, which have been used historically as refrigerants. Collectively, these gases are often referred to as "high global-warming potential" gases.

The primary generators of GHG emissions in the United States are electricity generation and transportation. The EPA estimates that nearly 85 percent of the nation's GHG emissions are comprised of carbon dioxide (CO²). The majority of CO² is generated by petroleum consumption associated with transportation and coal consumption associated with electricity generation. The remaining emissions are predominately the result of natural-gas consumption associated with a variety of uses.

With regard to the project, proposed operational emissions are significantly less than the quantitative non-zero project-specific thresholds described above. The scope of the proposed project improvements will not involve a significant number of equipment hours to complete and would not generate significant traffic volumes during construction. Post-construction, the wireless communications facility would be unmanned and require only infrequent maintenance visits which are not expected to generate significant GHG emissions. The proposed 30-kilowatt two hundred sixteen (216) gallon diesel backup generator will be infrequently operated during power outages and "exercise" cycling. Therefore, the project is not expected to generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, nor would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Mitigation/Monitoring: None proposed.

IX. HAZARDS AND HAZARDOUS MATERIALS: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which 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?				X
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?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?			X	

Discussion: Based on these comments, the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, and a Radio Frequency Emissions Compliance Report prepared by Waterford Consultants, LLC (April 2025) the following findings can be made:

- The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Based on a Radio Frequency Emissions Analysis provided by Waterford Consultants, LLC and predictive modeling, the proposed Verizon equipment to be located on the top sector of the tower will be compliant with Radiofrequency Radiation Exposure Limits of 47 C.F.R. §§ 1.1307(b)(3) and 1.1310. Horizontal Safety Distance (HSD) and Vertical Safety Distance (VSD) data for the two lower sectors reserved for collocating facilities were not provided in the Radio Frequency Analysis, but it can be reasonably expected that the HSD and VSD would be similar to the HSD and VSD of the Verizon equipment. The conditions of approval for the project would require the applicant for a collocating facility to provide certification by a qualified independent RF engineer that the maximum RF emissions levels of radio signals set by the Federal Communications Commissions (FCC) regulations will not be exceeded at this facility. RF alerting signage and restricting access to the monopole to authorized climbers that have completed RF safety training is required for occupational environment compliance. With conformance to the conditions of approval for the project and FCC regulations, the proposed project will not expose members of the general public to hazardous levels of RF energy and will not contribute to existing cumulative maximum permissible exposure levels on walkable surfaces at ground or in adjacent buildings by 5% of the general population limits. Therefore, potential impacts of the project from RF energy would be less-than-significant.

- b) Hazardous materials such as industrial fuels, oils, and solvents may be stored at the site during construction. Two hundred and sixteen (216) gallons of diesel fuel will be stored onsite for powering the proposed backup generator. The site will also store batteries inside two proposed equipment cabinets for emergency backup power. A Hazardous Materials Business Plan (HMBP) is required if hazardous materials are stored in reportable quantities. A hazardous substance is reportable if stored at or above 55 gallons for liquids; 200 cubic feet for compressed gas; or 500 pounds for solids. Therefore, a HMBP is required. The HMBP would address hazardous materials safety concerns. The conditions of approval for the project would include a standard condition requiring compliance with this regulatory requirement. Therefore, the project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- c) The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest school, Happy Valley Primary School is located approximately 0.6 miles south of the project site.
- d) The project is not located on a site which is included on a list of hazardous materials sites compiled by the California Department of Toxic Substances Control pursuant to Government Code Section 65962.5.
- e) The project is not located within an airport land use plan or within two miles of a public airport or public use airport.
- f) A review of the project and the Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan indicates that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g) The project is located in a “Very High” fire hazard severity zone. All improvements will be required to be constructed in accordance with Fire Safety Standards. These standards also require the clearing of combustible vegetation around all structures for a distance of not less than 30 feet on each side or to the property line. The California Public Resources Code Section 4291 includes a “Defensible Space” requirement of clearing 100 feet around all buildings or to the property line, whichever is less. The wireless communications facility will be unmanned and requires only infrequent maintenance visits. The project will not substantially increase the exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Mitigation/Monitoring: None proposed.

X. <u>HYDROLOGY AND WATER QUALITY</u>: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.				X
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:			X	

X. <u>HYDROLOGY AND WATER QUALITY</u>: Would the project:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
(i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable management plan?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The wireless communications facility would be unmanned, and no additional water demand is proposed with this project. Through adherence to construction standards, including erosion and sediment control measures, water quality and waste discharge standards will not be violated. Grading will be needed for this project, and a grading permit will be required. The provisions of the grading permit will address erosion and siltation containment on- and off-site. Therefore, potential impacts of the project from violation of water quality standards, waste discharge, or other potential causes of water degradation would be less-than-significant.
- b) The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project does not propose any new well(s). The project would not significantly increase impervious surface area within the project site to the extent that it would cause interference with groundwater recharge. The wireless communications facility would be unmanned, and no additional water demand is proposed with this project.
- c) The project would not substantially alter the existing drainage pattern of the site or area in a manner which would (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flows. The project site is relatively flat and construction of the facility would not require any significant recontouring. The project would include grading and trenching to construct an approximately 874-foot-long, twelve (12)-foot-wide gravel access road and to install approximately 1,014-feet of underground utilities from Oak Street to proposed PG&E transformer. The driveway would be constructed on flat ground and a culvert is proposed at the existing drainage ditch along Oak street to allow drainage to flow under the proposed new encroachment. The Shasta County Department of Public Works reviewed the project and did not indicate the proposed driveway and associated culvert would negatively impact the roadside drainage. New impervious surfaces in the lease area would include the monopole and foundation, the 7-foot by 14-foot 6-inch equipment pad, 3-foot 8-inch by 7-foot 6-inch generator pad, and two (2) 50-inch by 52-inch concrete pad for a PG&E transformer and utility meter. Drainage from the proposed impervious surfaces, will be dispersed to adjacent unimproved areas. Compliance with all provisions of the grading permits including sediment and erosion control measures, would be required. The project, as proposed, would not significantly alter the existing drainage pattern or concentrate and direct storm water run-off that would significantly increase potential erosion or siltation on or off-site.
- d) The project is not in a flood hazard, tsunami, or seiche zone.
- e) Through adherence to construction standards, and the provisions of the required grading permit, including erosion and sediment control measures, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable management plan.

Mitigation/Monitoring: None proposed.

XI. LAND USE AND 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?				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not physically divide an established community. The project is not located in any established community. The project does not include the creation of any road, ditch, wall, or other feature which would physically divide an established community.
- b) The project is consistent with the RA General Plan land use designation, and the R-R-T zone district. In accordance with Shasta County general development standards for landscaping, the applicant is requesting an exception to the landscaping standards specified in Chapter 17.88.282 of the Shasta County Code, "Wireless Telecommunication Facilities," which require landscaping be provided and maintained for the life of the facility to screen any ground structures or equipment. The applicant is proposing to outfit the perimeter chain link fence with faux ivy screening. The conditions of approval require that the fence and screening be maintained in a working condition for the life of the project. The faux ivy screening and maintenance thereof, would provide the same practical effect as mature landscaping and together with existing vegetation and development on the project site, will effectively shield the ground structures and equipment from view. With approval of the exception to the landscape standards, the project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and would be consistent with Chapter 17.88.282 of the Shasta County Code, "Wireless Telecommunication Facilities."

Mitigation/Monitoring: None proposed.

XII. MINERAL RESOURCES E 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?				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) There are no known mineral resources of regional value located on or near the project site. Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.
- b) The project site is not identified in the General Plan Minerals Element as containing a locally-important mineral resource. There is no other land use plan which addresses minerals. Therefore, the project would not 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.

Mitigation/Monitoring: None proposed.

<u>XIII. NOISE</u> Would the project result in:	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
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?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, Planning Staff calculated the noise levels by using the generator specs provided by the applicant and input them into our attenuation calculator where the following findings were made:

- a) Per the Shasta County Code Section, 17.88.282.D.4, wireless facilities shall be constructed and operated in compliance with the standards of the Shasta County General Plan Noise Element and implementing ordinances and standards. Per the County's General Plan, noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table N-IV of the Shasta County General Plan as measured immediately within the property line of lands designated for noise-sensitive uses. These noise level performance standards for non-transportation sources are 55dB hourly Leq for daytime (7:00 a.m. to 10:00 p.m.) hours and 50dB hourly Leq for nighttime (10:00 p.m. to 7:00 a.m.) hours. Based on a noise attenuation calculation completed by Planning Staff, the proposed backup generator would generate a sound intensity of 49.9dB at the nearest property line (east property line) located approximately 137 feet from the proposed location of the generator. The generator would operate intermittently either during a power outage or as part of its maintenance cycle. Thus, the Shasta County General Plan noise level performance standards for non-transportation sources at all property lines would not be exceeded. There would also be increased noise levels during the construction phase of the project. For use permits involving construction near residences, staff recommends a standard condition of approval limiting construction to daylight hours between 7:00 a.m. and 7:00 p.m. and prohibiting construction on Sundays and Federal holidays. The duration needed to complete construction of the facility would relatively short. This in combination with limited hours and days for construction activity ensure that the temporary increase in ambient noise levels in the vicinity of the project is expected to be less-than-significant.
- b) The project would not result in generation of excessive groundborne vibration or groundborne noise levels. Sources of groundborne vibration or groundborne noise levels would be limited to the uses of typical construction equipment. Any groundborne vibration or noise levels because of excavation of footings for the tower and other ancillary structures or trenching for the underground power are expected to be less-than-significant.
- c) The project is not located within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public airport or public use airport.

Mitigation/Monitoring: None proposed.

<u>XIV. POPULATION AND HOUSING</u> E 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)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not induce substantial unplanned population growth in the area, either directly or indirectly. The project does not include the development of new homes or businesses, nor would any new jobs be created as a result of the project. The project would include the development of an access driveway and extensions of utilities solely to serve the proposed wireless telecommunication facility. There would be no extension of other infrastructure. Therefore, the project is not expected to induce substantial growth in the area.
- b) The project would not displace existing housing, necessitating the construction of replacement housing elsewhere. The project does not include destruction of any existing housing.

Mitigation/Monitoring: None proposed.

XV. 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
Fire Protection?				X
Police Protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

The project would not 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:

Fire Protection:

The project is located in a “Very High” fire hazard severity zone. However, no significant additional level of fire protection is necessary.

Police Protection:

The County employs a total of 165 sworn and 69 non-sworn County peace officers (Sheriff’s deputies) to serve a population of 66,850 persons that reside in the unincorporated area of the County (U.S. Department of Commerce, Bureau of the Census, April 1, 2020). This level of staffing equates to a ratio of approximately one officer per 286 persons. The wireless communications facility would be unmanned and require only infrequent maintenance visits. The proposed wireless telecommunications facility would be enclosed by a 6-foot-tall chain link fence. The project is not expected to require any significant additional level of police protection.

Schools:

The resultant development from the project will be required to pay the amount allowable per square foot of construction to mitigate school impacts.

Parks:

The County does not have a neighborhood parks system.

Other public facilities:

None.

Mitigation/Monitoring: None proposed.

XVI. <u>RECREATION</u>:	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?				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not 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. The County does not have a neighborhood or regional parks system or other recreational facilities.
- b) The project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Mitigation/Monitoring: None proposed.

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

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The project would not conflict with a program, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The project site is accessed from Oak Street. The wireless communications facility would be unmanned and require only infrequent maintenance visits. The project would not generate enough traffic to significantly reduce the volume-to-capacity ratio of adjacent roadways to a reduced level of service.
- b) Vehicle miles traveled within the County would temporarily increase during construction. The temporary increase would be attributable to employee and inspector travel and deliveries of materials and equipment. This temporary increase is not anticipated to be substantial due to the limited scope and duration of construction. The wireless communications facility would be unmanned and require only infrequent maintenance visits. Vehicle miles traveled in support of facility operations would be negligible. Therefore, potential impacts of the project attributable to conflicts or inconsistencies with CEQA Guidelines section 15064.3 subdivision (b) would be less-than-significant.

- c) The project would not substantially increase hazards due to a geometric design feature or incompatible uses. The proposed new 12-foot-wide gravel access driveway does not have geometric design features that would lead to an increase in hazards. There are no land uses occurring on the property that would be considered incompatible with a wireless telecommunications facility.
- d) The project site is accessed from Oak Street. The project has been reviewed by the Shasta County Fire Department and the Happy Valley Fire Department. Happy Valley Fire Protection District reviewed the project and had no concerns. The project includes a turn-around for emergency vehicles on the proposed driveway outside of the lease area. The conditions of approval require that the driveway and turn-around are constructed in accordance with Section 6.12 of the Fire Safety Standards prior to the final inspection by the Shasta County Building Division. Therefore, the project would not result in inadequate emergency access.

Mitigation/Monitoring: None proposed.

<u>XVIII. TRIBAL CULTURAL RESOURCES:</u> Would the project:	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 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), or ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code 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.				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) Information about the project was sent to the Northeast Information Center of the California Historical Resources Information System, which reviewed the project and commented that the project area is considered to be low sensitivity for cultural resources. No prehistoric resources have been recorded within a half mile and no historical resources were inadvertently discovered during the development of single-family residence and accessory buildings.

In accordance PRC §21080.3.1 the Department of Resource Management sent a certified letter to notify the Paskenta Tribe Band of Nomlaki Indians (Tribe) and the Wintu Tribe of Northern California & Toyon-Wintu Center that the project was under review and to provide the Tribe 30 days from the receipt of the letter to request formal consultation on the project in writing. Certified mail records indicate that the notification letter was received by the Tribes on Monday, December 1, 2025. As of January 1, 2026, no request for consultation on the project was received from the Tribe.

The project would not cause a substantial adverse change in the significance of a tribal cultural resource as there is no evidence of historical resources at the site that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources; or 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.

Although there is no evidence to suggest that the project would result in any significant effect on tribal cultural resources, there is always the possibility that such resources or remains could be encountered. Therefore, if, in the course of development, any archaeological, historical, or paleontological resources are uncovered, discovered or otherwise detected or observed, mineral

exploration activities in the affected area shall cease and a qualified archaeologist shall be contacted to review the site and advise the County of the site's significance. If the findings are deemed significant by the Environmental Review Officer, appropriate mitigation shall be required.

Mitigation/Monitoring: None proposed.

XIX. 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 relocations of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X
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 projects projected demand in addition to the providers existing commitments?				X
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?				X
e) Comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, natural gas or telecommunications facilities, the construction or relocations of which could cause significant environmental effects. The wireless communications facility would be unmanned and not require wastewater treatment, water service, solid waste disposal service, and have minimal impact to storm water drainage. The project would involve routing underground conduit and telecommunications. A grading permit is required prior to any grading activities. Through adherence to construction standards and the provisions of the required grading permit, potential environmental effects would be less-than-significant.
- b) The project would have minimal demand for water. During construction water may be used for dust control but otherwise the unmanned wireless communications facility would require little or no additional water demand during operations. The facility would be unmanned and require only infrequent maintenance visits.
- c) The project would not require wastewater treatment. The facility would be unmanned and require only infrequent maintenance visits.
- d) The project would not 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. The wireless communications facility would be unmanned and require only infrequent maintenance visits.
- e) The project would comply with Federal, State, and local management and reduction statutes and regulations related to solid waste. The wireless communications facility would be unmanned and require only infrequent maintenance visits.

Mitigation/Monitoring: None proposed.

XX. 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?				X
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?				X
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?				X
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?				X

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) A review of the project and the Shasta County and City of Anderson Multi-Jurisdictional Hazard Mitigation Plan, and the Shasta County Emergency Operations Plan, indicates that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- b) The project would not 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.
- c) The project involves construction of a gravel driveway, underground utilities, and a wireless telecommunication facility, including ground mounted equipment and utilities within a 50-foot by 50-foot lease area. These improvements would require periodic maintenance. The lease area would be surfaced with gravel. The installation and maintenance of these improvements would not significantly exacerbate fire risk or result in significant temporary or ongoing impacts to the environment.
- d) The project would not 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.

Mitigation/Monitoring: None proposed.

XXI. <u>MANDATORY FINDINGS OF SIGNIFICANCE:</u>	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 the 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?		X		
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 the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	

XXI. <u>MANDATORY FINDINGS OF SIGNIFICANCE:</u>	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporated	Less-Than-Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Discussion: Based on the related documents listed in the Sources of Documentation for Initial Study Checklist, staff review of the project, observations on the project site and in the vicinity, the following findings can be made:

- a) Based on the discussion and findings in Section IV. Biological Resources, there is no evidence to support a finding that the project would 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 the self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. In addition, based on discussions and findings in Section V. Cultural Resources, there is no evidence to support a finding that the project would have potential to eliminate important examples of the major periods of California history or prehistory.
- b) Based on the discussion and findings in all Sections above, there is no evidence to suggest that the project would have impacts that are cumulatively considerable.
- c) Based on the discussion and findings in all Sections above, there is no evidence to support the finding that the project would have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.

Mitigation/Monitoring: With the mitigation measures being proposed, potential impacts will be less-than-significant. See the attached Mitigation Monitoring Program (MMP) for a complete listing of the proposed mitigation measures, timing/implementation of the measures, and enforcement/monitoring agent.

INITIAL STUDY COMMENTS

PROJECT NUMBER Use Permit 25-0002 – Towers of California, LLC

GENERAL COMMENTS:

Special Studies: The following project-specific studies have been completed for the proposal and will be considered as part of the record of decision for the Mitigated Negative Declaration. These studies are available for review through the Shasta County Planning Division and online via the link [CEQA Documents and Notices \(non-EIR documents\) | Shasta County California](https://www.shastacounty.gov/planning/page/ceqa-documents-and-notice-non-eir-documents) or via the browser web address at: <https://www.shastacounty.gov/planning/page/ceqa-documents-and-notice-non-eir-documents>.

1. Photo Simulations, Draft Link, October 2025
2. Radio Frequency Emissions Compliance Report, Waterford Consultants, LLC, April 22, 2025

Agency Referrals: Prior to an environmental recommendation, referrals for this project were sent to agencies thought to have responsible agency or reviewing agency authority. The responses to those referrals (attached), where appropriate, have been incorporated into this document and will be considered as part of the record of decision for the Negative Declaration. To date, referral comments have been received from the following State agencies or any other agencies which have identified CEQA concerns:

1. California Department of Fish and Wildlife – Region 1
2. Northeast Information Center – California Historical Resources Information Systems
3. Happy Valley Fire Protection District

Conclusion/Summary: Based on review by the Planning Division and other agency staff, early consultation review comments from other agencies, information provided by the applicant, and existing information available to the Planning Division, the project, as revised and mitigated, is not anticipated to result in any significant environmental impacts.

SOURCES OF DOCUMENTATION FOR INITIAL STUDY CHECKLIST

All headings of this source document correspond to the headings of the initial study checklist. In addition to the resources listed below, initial study analysis may also be based on field observations by the staff person responsible for completing the initial study. Most resource materials are on file in the office of the Shasta County Department of Resource Management, Planning Division, 1855 Placer Street, Suite 103, Redding, CA 96001, Phone: (530) 225-5532.

GENERAL PLAN AND ZONING

1. Shasta County General Plan and land use designation maps.
2. Applicable community plans, airport plans and specific plans.
3. Shasta County Zoning Ordinance (Shasta County Code Title 17) and zone district maps.

ENVIRONMENTAL IMPACTS

I. AESTHETICS

1. Shasta County General Plan, Section 6.8 Scenic Highways, and Section 7.6 Design Review.
2. Zoning Standards per Shasta County Code, Title 17.

II. AGRICULTURAL AND FORESTRY RESOURCES

1. Shasta County General Plan, Section 6.1 Agricultural Lands.
2. Shasta County Important Farmland 2016 Map, California Department of Conservation.
3. Shasta County General Plan, Section 6.2 Timber Lands.
4. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.

III. AIR QUALITY

1. Shasta County General Plan Section, 6.5 Air Quality.
2. Northern Sacramento Valley Air Basin, 2021 Air Quality Attainment Plan.
3. Records of, or consultation with, the Shasta County Department of Resource Management, Air Quality Management District.

IV. BIOLOGICAL RESOURCES

1. Shasta County General Plan, Section 6.2 Timberlands, and Section 6.7 Fish and Wildlife Habitat.
2. Designated Endangered, Threatened, or Rare Plants and Candidates with Official Listing Dates, published by the California Department of Fish and Wildlife.
3. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.
4. Federal Listing of Rare and Endangered Species.
5. Shasta County General Plan, Section 6.7 Fish and Wildlife Habitat.
6. State and Federal List of Endangered and Threatened Animals of California, published by the California Department of Fish and Wildlife.
7. Natural Diversity Data Base Records of the California Department of Fish and Wildlife.

V. CULTURAL RESOURCES

1. Shasta County General Plan, Section 6.10 Heritage Resources.
2. Records of, or consultation with, the following:
 - a. The Northeast Information Center of the California Historical Resources Information System, Department of Anthropology, California State University, Chico.
 - b. State Office of Historic Preservation.
 - c. Local Native American representatives.
 - d. Shasta Historical Society.

VI. ENERGY

1. California Global Warming Solutions Act of 2006 (AB 32)
2. California Code of Regulations Title 24, Part 6 – California Energy Code
3. California Code of Regulations Title 24, Part 11 – California Green Building Standards Code (CALGreen)

VII. GEOLOGY AND SOILS

1. Shasta County General Plan, Section 5.1 Seismic and Geologic Hazards, Section 6.1 Agricultural Lands, and Section 6.3 Minerals.
2. County of Shasta, Erosion and Sediment Control Standards, Design Manual
3. Soil Survey of Shasta County Area, California, published by U.S. Department of Agriculture, Soil Conservation Service and Forest Service, August 1974.
4. Alquist - Priolo, Earthquake Fault Zoning Maps.

VIII. GREENHOUSE GAS EMISSIONS

1. Shasta Regional Climate Action Plan
2. California Air Pollution Control Officers Association (White Paper) CEQA & Climate Change, Evaluating and Addressing

IX. HAZARDS AND HAZARDOUS MATERIALS

1. Shasta County General Plan, Section 5.4 Fire Safety and Sheriff Protection, and Section 5.6 Hazardous Materials.
1. County of Shasta Multi-Hazard Functional Plan
3. Records of, or consultation with, the following:
 - a. Shasta County Department of Resource Management, Environmental Health Division.
 - b. Shasta County Fire Prevention Officer.
 - c. Shasta County Sheriff's Department, Office of Emergency Services.
 - d. Shasta County Department of Public Works.
 - e. California Environmental Protection Agency, California Regional Water Quality Control Board, Central Valley Region.

X. HYDROLOGY AND WATER QUALITY

1. Shasta County General Plan, Section 5.2 Flood Protection, Section 5.3 Dam Failure Inundation, and Section 6.6 Water Resources and Water Quality.
2. Flood Boundary and Floodway Maps and Flood Insurance Rate Maps for Shasta County prepared by the Federal Emergency Management Agency, as revised to date.
3. Records of, or consultation with, the Shasta County Department of Public Works acting as the Flood Control Agency and Community Water Systems manager.

XI. LAND USE AND PLANNING

1. Shasta County General Plan land use designation maps and zone district maps.
2. Shasta County Assessor's Office land use data.

XII. MINERAL RESOURCES

1. Shasta County General Plan Section 6.3 Minerals.

XIII. NOISE

1. Shasta County General Plan, Section 5.5 Noise and Technical Appendix B.

XIV. POPULATION AND HOUSING

1. Shasta County General Plan, Section 7.1 Community Organization and Development Patterns.
2. Census data from U.S. Department of Commerce, Bureau of the Census.
3. Shasta County General Plan, Section 7.3 Housing Element.
4. Shasta County Department of Housing and Community Action Programs.

XV. PUBLIC SERVICES

1. Shasta County General Plan, Section 7.5 Public Facilities.
2. U.S. Department of Commerce, Bureau of the Census.
3. Records of, or consultation with, the following:
 - a. Shasta County Fire Prevention Officer.
 - b. Shasta County Sheriff's Department.
 - c. Shasta County Office of Education.
 - d. Shasta County Department of Public Works.

XVI. RECREATION

1. Shasta County General Plan, Section 6.9 Open Space and Recreation.

XVII. TRANSPORTATION/TRAFFIC

1. Shasta County General Plan, Section 7.4 Circulation.
2. Records of, or consultation with, the following:
 - a. Shasta County Department of Public Works.
 - b. Shasta County Regional Transportation Planning Agency.
 - c. Shasta County Congestion Management Plan/Transit Development Plan.
3. Institute of Transportation Engineers, Trip Generation Rates.

XVIII. TRIBAL CULTURAL RESOURCES

1. Tribal Consultation in accordance with Public Resources Code section 21080.3.1

XIX. UTILITIES AND SERVICE SYSTEMS

1. Records of, or consultation with, the following:
 - a. Pacific Gas and Electric Company.
 - b. Pacific Power and Light Company.
 - c. Pacific Bell Telephone Company.
 - d. Citizens Utilities Company.
 - e. T.C.I.

- f. Marks Cablevision.
- g. Shasta County Department of Resource Management, Environmental Health Division.
- h. Shasta County Department of Public Works.

XX. WILDFIRE

- 1. Office of the State Fire Marshall-CALFIRE Fire Hazard Severity Zone Maps
- 2. County of Shasta Multi-Jurisdictional Hazard Mitigation Plan

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

- 1. None

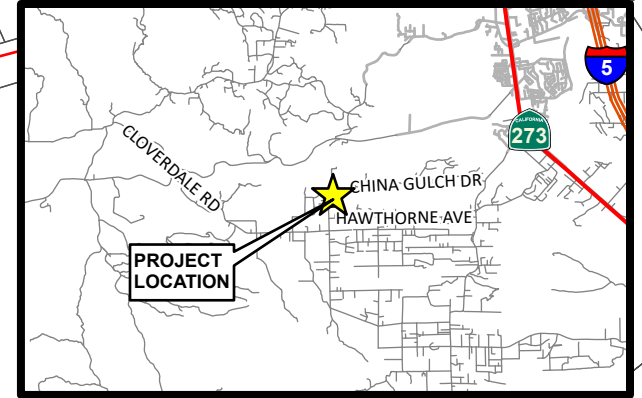
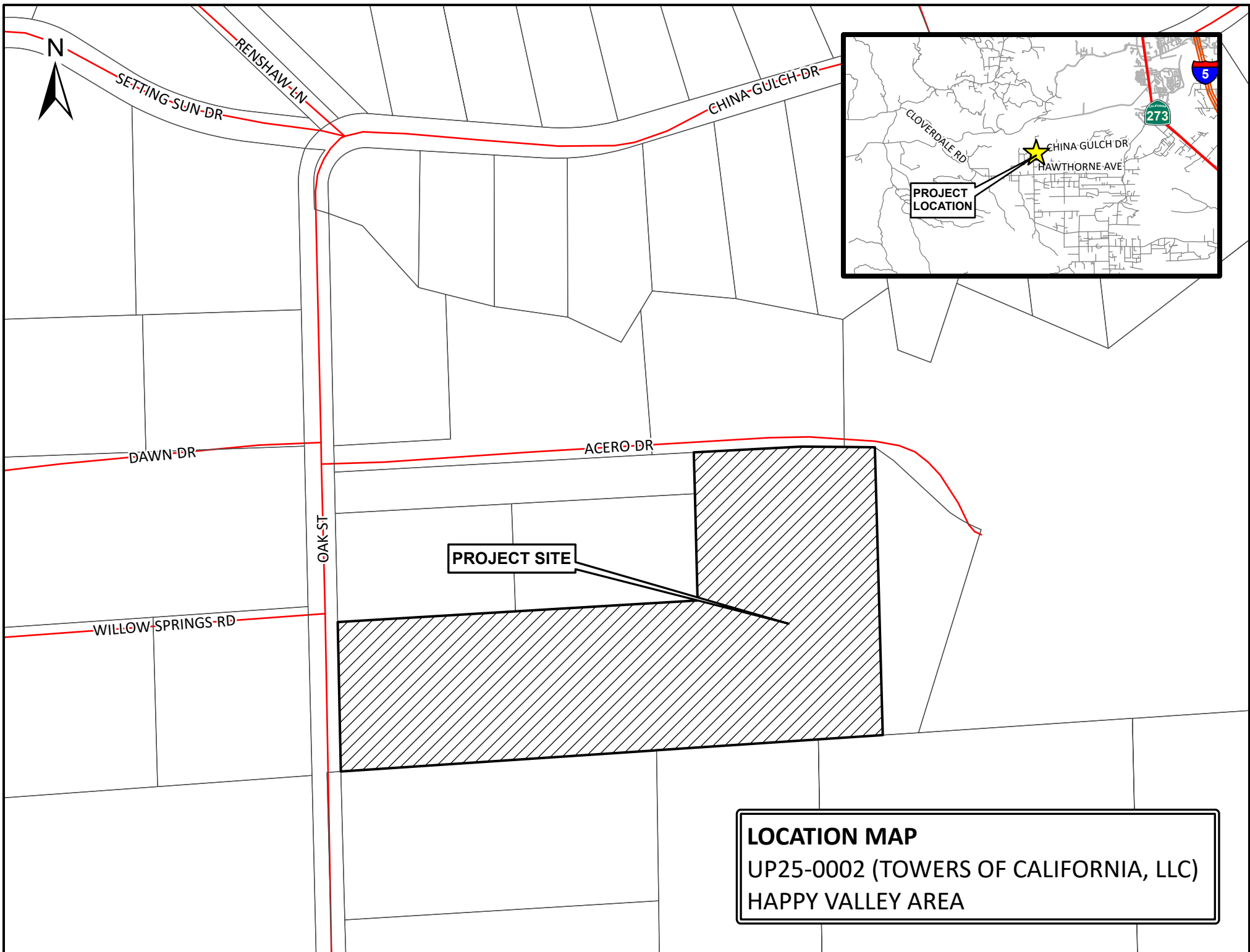
**MITIGATION MONITORING PROGRAM (MMP)
FOR USE PERMIT 25-0002 (TOWERS OF CALIFORNIA, LLC)**

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
IV.a.1) The project proponent shall implement the following mitigation measures to avoid significant impacts to nesting birds and/or raptors protected under Fish and Game Code sections 3503 and 3503.5: A. Conduct vegetation removal and other ground-disturbance activities associated with construction from September 1 through January 31, when birds are not nesting; or B. If vegetation removal or ground disturbance activities occur during the nesting season (February 1 through August 31), a pre-construction nesting survey shall be conducted by a qualified biologist within 14 days of vegetation removal or construction activities. If an active nest is located during the preconstruction surveys, avoidance and minimization measures should be implemented in accordance with recommendations from a qualified biologist. Avoidance and minimization measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified during the survey, as well as ongoing monitoring by biologists. The results of the pre-construction surveys shall be sent electronically to CDFW at R1CEQARedding@wildlife.ca.gov.	Prior to Issuance of Building Permits / During Construction/ For the life of the Use Permit	Resource Management, Planning Division / Building Division / California Department of Fish and Wildlife	
IV.a.2) The project proponent shall implement the following mitigation measures to avoid significant impacts to bat species protected under Fish and Game Code section 4150: A. Trees that contain cavities, crevices, or exfoliated bark have high potential to be used by various bat species. If land alteration and/or removal of trees with cavities, crevices, or exfoliated bark will occur, a thorough survey should be conducted by a qualified biologist to determine if bat roosting opportunities are present prior to tree removal.	Prior to Issuance of Building Permits / During Construction/ For the life of the Use Permit	Resource Management, Planning Division / Building Division / California Department of Fish and Wildlife	

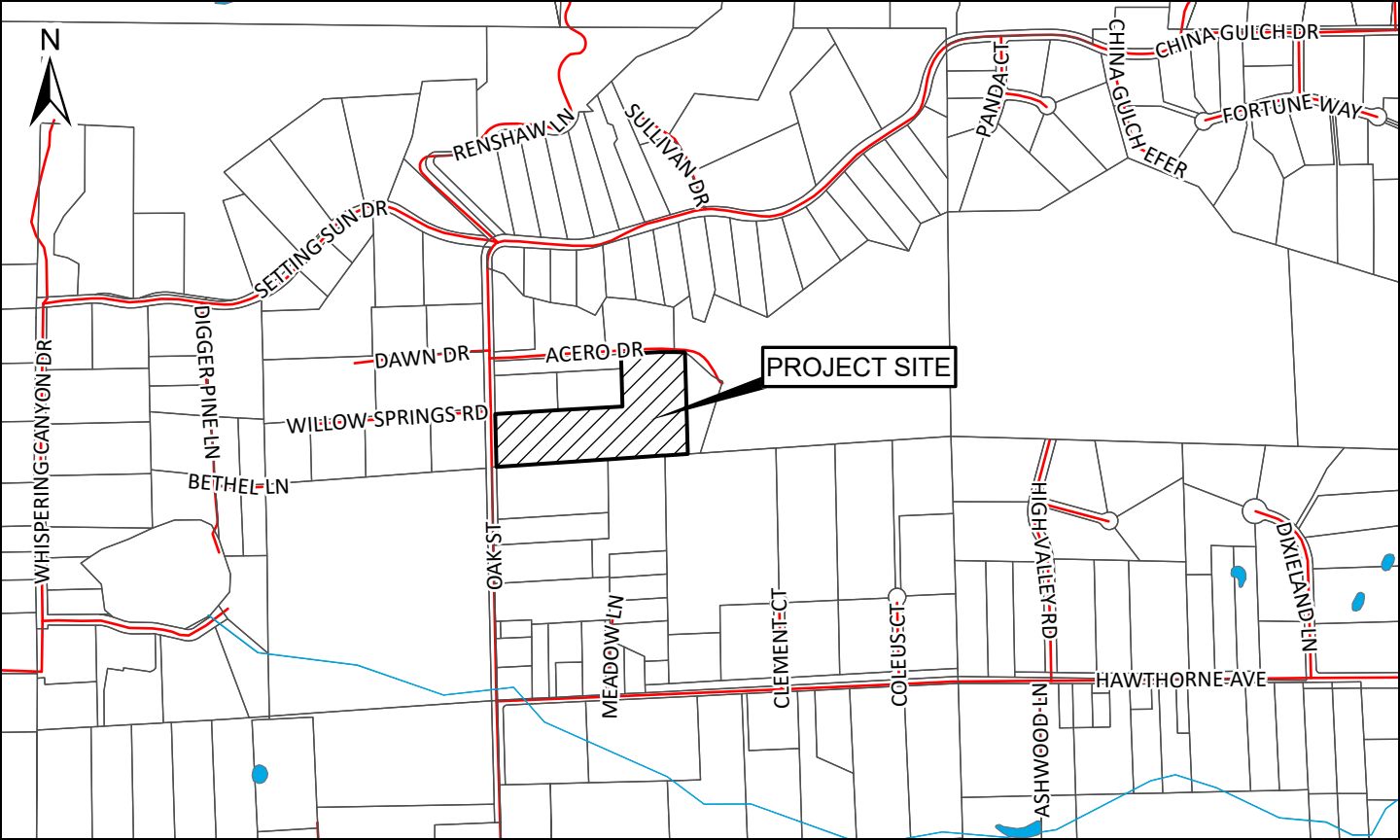
Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
B. Trees with 12” diameter at breast height (DBH) or greater with potentially suitable roosting features should be clearly marked by a qualified biologist and may be removed as follows: i. To avoid impacts to roosting bats, removal of trees should occur only during the following time frames and subject to the following weather conditions, or as otherwise approved/recommended by a qualified biologist: • Between March 15 and April 30, and between August 15 and October 1; and • Between October 2 and March 14 when evening temperatures are above 45°F, and no more than ½” of rainfall within a 24-hour period prior to tree removal. ii. Trees shall be removed using a two-step process to allow bats the opportunity to abandon the roost prior to removal. The two-step removal process is as follows: • Day 1: Remove small-diameter trees, brush, and non-habitat features of large trees (branches without cavities, crevices, or exfoliating bark) to create noise and vibration disturbance on the tree and to alter the air flow and temperature around the roost feature thus encouraging bats to vacate roost features on their own. The tree shall then be left for 24 hours to allow the bats to move to another roost site. No excavators, grinders, or other heavy equipment should be used for first day trimming of bat habitat trees. • Day 2: If bats may be in branches that can be removed from the tree and set aside, cut the branches off intact and set them upright against			

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
trees away from the Project area to allow any bats present to passively escape. Then, remove the remainder of the tree.			
IV.a.3) The project proponent shall implement the following mitigation measures to avoid significant impacts to special-status bumble bees: A. Conduct construction activities outside of the peak months of the Crotch's bumble bee colony flight season (November 1 through February 1). B. If construction activity will occur during the peak months of the Crotch's bumble bee colony flight season (February 1 through October 31), a qualified biologist, specifically those qualified under a research Memorandum of Understanding or authorizing Incidental Take Permit (as described on page 7 of CDFW's Guidelines), shall conduct surveys for special-status bumble bees prior to the start of construction. Three on-site surveys shall be conducted two to four weeks apart, weather depending, and when floral resources are present. v. Species identification and photographic vouchers shall be submitted to CDFW and experts from the Bumble Bee Watch for species verification by an experienced taxonomist prior to the start of land modification and/or vegetation removal. vi. If special-status bumble bees are detected, a nesting survey as the protocol is described in CDFW's <i>June 2023 Survey Considerations for CESA Candidate Bumble Bee Species</i>, shall be performed throughout the project area. vii. If special-status bumble bees and/or their nests are detected, the potential for "take" as defined by Fish and Game Code section 86 shall be analyzed and quantified. If suitable avoidance and minimization measures to fully avoid take are not feasible, CDFW shall be consulted regarding the need for take	Prior to Issuance of Building Permits / During Construction/ For the life of the Use Permit	Resource Management, Planning Division / Building Division / California Department of Fish and Wildlife	

Mitigation Measure/Condition	Timing/Implementation	Enforcement/Monitoring	Verification (Date & Initials)
authorization pursuant to Fish and Game Code section 2081(b). Otherwise, suitable avoidance and minimization measures to fully avoid take should be employed, and/or the formulation of a Mitigation and Monitoring Plan should be developed for impacts to suitable Crotch's bumble bee habitat. viii. All data, including negative and/or positive observations, shall be submitted to the CNDDDB and Bumble Bee Watch.			



LOCATION MAP
UP25-0002 (TOWERS OF CALIFORNIA, LLC)
HAPPY VALLEY AREA



PROJECT SITE

Map labels include:

- WHISPERING CANYON DR
- DIGGER PINE LN
- BETHEL LN
- WILLOW SPRINGS RD
- DAWN DR
- AGERO DR
- OAK ST
- MEADOW LN
- CLEMENT CT
- COLEUS CT
- HIGH VALLEY RD
- N. DOGWOOD HWY
- HAWTHORNE AVE
- PIXIELAND LN
- CHINA GULCH DR
- CHINA GULCH EFER
- FORTUNE WAY
- PANDA CT
- RENSHAW LN
- SULLIVAN DR



ACERO DR

OAK ST

PROJECT SITE

PROJECT AERIAL
UP25-0002 (TOWERS OF CALIFORNIA, LLC)
HAPPY VALLEY AREA



DAWN-DR

ACERO-DR

WILLOW-SPRINGS-RD

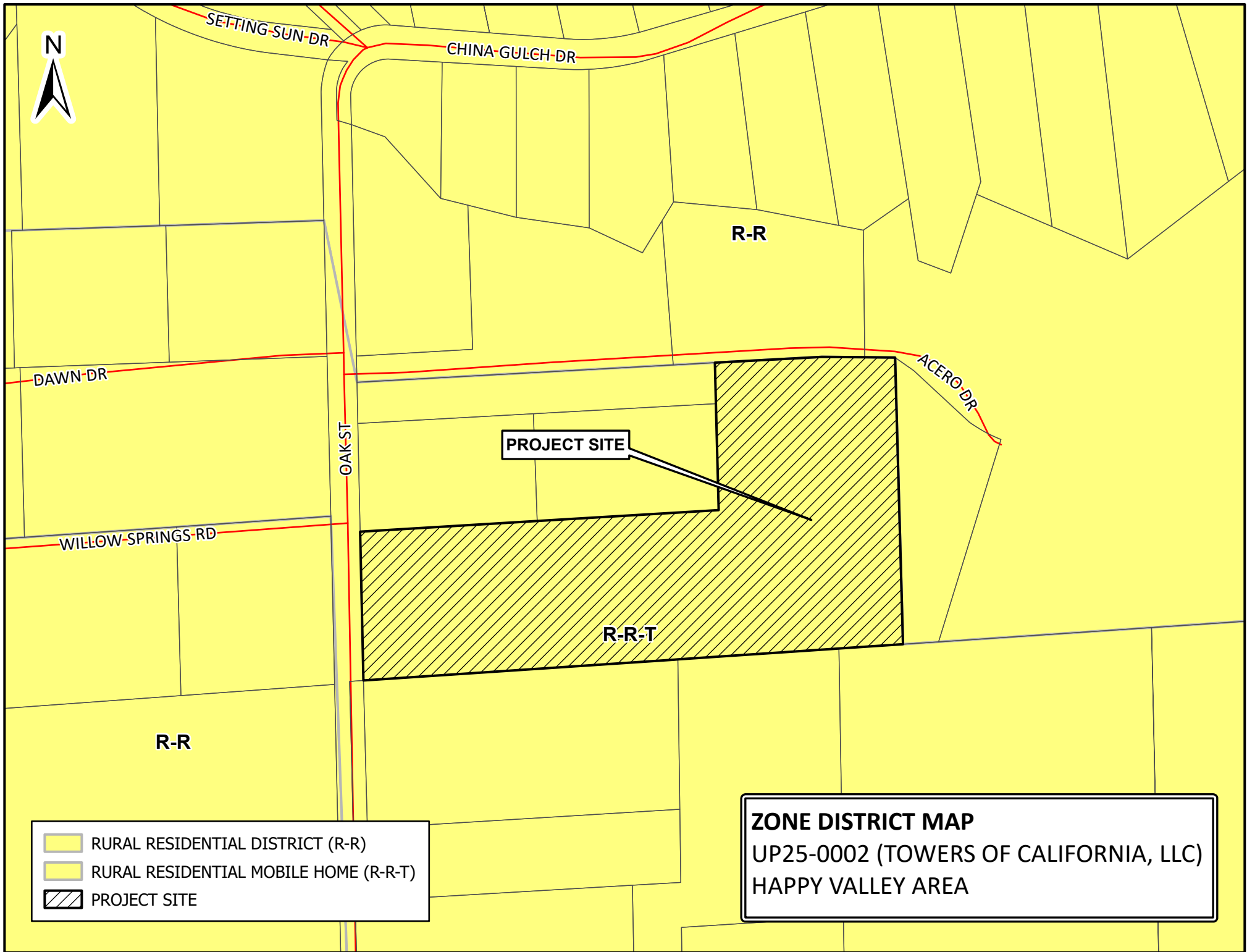
OAK-ST

PROJECT SITE

RA

RURAL RESIDENTIAL A (RA)

GENERAL PLAN DESIGNATION MAP
UP25-0002 (TOWERS OF CALIFORNIA, LLC)
HAPPY VALLEY AREA



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2. MONOPINE LENGTH OF ARTIFICIAL BRANCHES EXCEED THAT OF THE ANTENNA ARRAYS BY A MIN. OF ONE FOOT.

3. MONOPINE DENSITY OF FOLIAGE BE SUCH THAT THE VISIBILITY OF THE ANTENNA ARRAYS ARE SECONDARY TO MONOPINE.

4. MONOPINE BRANCH FOLIAGE TO BE USED SHALL BE "DARK DUSTED"

5. MONOPINE BRANCH FOLIAGE VARIES IN DENSITY, SPACING, SIZE AND ANGLE TO AVOID RIGID SYMMETRY.

6. MONOPINE BRANCHING BE "DARK DUSTED" TO PROVIDE NATURAL APPEARANCE.

7. MONOPINE ANTENNAS & HARDWARE BE ENTIRELY SCREENED FROM VIEW BY UTILIZING PINE NEEDLE SOCKS.

8. MONOPINE POLE TO BE ROUND AND COVERED AND/ OR PAINTED TO SIMULATE THE APPEARANCE OF BARK.

PROPOSED 5' LONG LIGHTNING ROD

PROPOSED ANTENNA, RADIO & EQUIPMENT PINE NEEDLE SOCKS

PROPOSED VERIZON WIRELESS RRU's, TYP. 4 PER SECTOR (TOTAL-12)

PROPOSED VERIZON WIRELESS 8' PANEL ANTENNAS, TYP. 4 PER SECTOR (TOTAL-12)

3'-0"

2'-0"

1'-0"

FUTURE CARRIER PANEL ANTENNAS (TYP.)

FUTURE CARRIER PANEL ANTENNAS (TYP.)

PROPOSED VERIZON WIRELESS 6'Ø MICROWAVE

PROPOSED VERIZON WIRELESS MICROWAVE RING MOUNT

PROPOSED 130' HIGH MONOPINE (POLE AND FOUNDATION BY OTHERS)

PROPOSED MONOPINE BRANCHING

130'-0"

125'-0"

121'-0"

92'-0"

TOP OF PROPOSED VERTICAL BRIDGE MONOPINE BRANCHING

TOP OF PROPOSED VERTICAL BRIDGE MONOPINE STEEL

TOP OF PROPOSED VERIZON WIRELESS ANTENNAS & VERTICAL BRIDGE MONOPINE STEEL

RAD CENTER OF PROPOSED VERIZON WIRELESS ANTENNAS

RAD CENTER OF PROPOSED VERIZON WIRELESS MICROWAVE

PROPOSED VERTICAL BRIDGE SIGNAGE MOUNTED TO ACCESS GATE

PROPOSED ADDRESS SIGNAGE WITH MIN 4" SIZED NUMBERS, MOUNTED TO FENCE FACING STREET

PROPOSED PG&E TRANSFORMER ON 50"x52" CONCRETE PAD

PROPOSED 600A PG&E PAD MOUNTED UG SERVICE TERMINATION SECTION

POLE BASE

GRADE

PROPOSED 12'-0" WIDE DOUBLE-SWING ACCESS GATE

PROPOSED STYMIELOCK

PROPOSED VERIZON WIRELESS CABLE ICE BRIDGE

PROPOSED VERIZON WIRELESS GPS ANTENNA MOUNTED TO ICE BRIDGE POST

PROPOSED VERIZON WIRELESS 10'X13' EQUIPMENT CANOPY

PROPOSED VERIZON WIRELESS (1) RADIO CABINET, (1) BATTERY CABINET, AND (1) FUTURE CABINET

PROPOSED VERIZON WIRELESS BACK-UP DIESEL GENERATOR

PROPOSED VERIZON WIRELESS UTILITY H-FRAME

PROPOSED 50'x50' VERTICAL BRIDGE LEASE AREA WITH 6'-0" HIGH CHAIN-LINK FENCED COMPOUND (WITH GREEN FAUX VINES) FENCED COMPOUND

100'-0"

110'-0"

15'-0"

100'-0"

110'-0"

RAD CENTER OF PROPOSED FUTURE 3RD CARRIER

RAD CENTER OF PROPOSED FUTURE 2ND CARRIER

100'-0"

110'-0"

15'-0"

BOTTOM OF MONOPINE BRANCHING

11"x17" SCALE: 1/16" = 1'-0"
24"x36" SCALE: 1/8" = 1'-0"

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TOP OF PROPOSED VERTICAL BRIDGE MONOPINE BRANCHING

TOP OF PROPOSED VERIZON WIRELESS ANTENNAS & VERTICAL BRIDGE MONOPINE STEEL

RAD CENTER OF PROPOSED VERIZON WIRELESS ANTENNAS

RAD CENTER OF PROPOSED VERIZON WIRELESS MICROWAVE

100'-0"

110'-0"

RAD CENTER OF PROPOSED FUTURE 3RD CARRIER

15'-0"

BOTTOM OF MONOPINE BRANCHING

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PROPOSED PG&E TRANSFORMER ON 50"x52" CONCRETE PAD

POLE BASE GRADE

PROPOSED 50'x50' VERTICAL BRIDGE LEASE AREA WITH 6'-0" HIGH CHAIN-LINK FENCED COMPOUND (WITH GREEN FAUX VINES) FENCED COMPOUND

PROPOSED VERIZON WIRELESS UTILITY H-FRAME

PROPOSED VERIZON WIRELESS CABLE ICE BRIDGE

PROPOSED VERIZON WIRELESS 10'x13' EQUIPMENT CANOPY

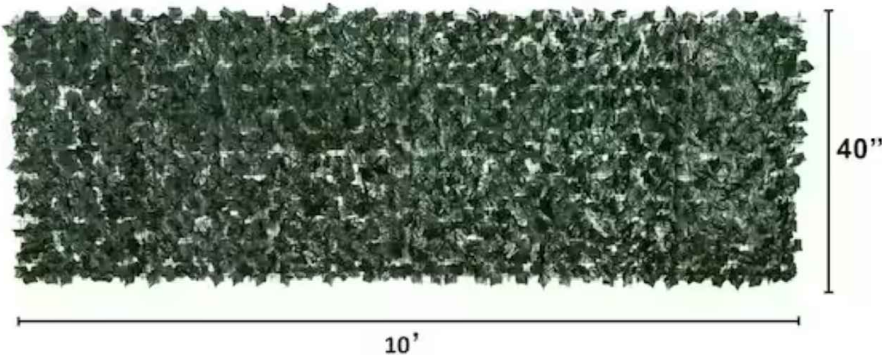
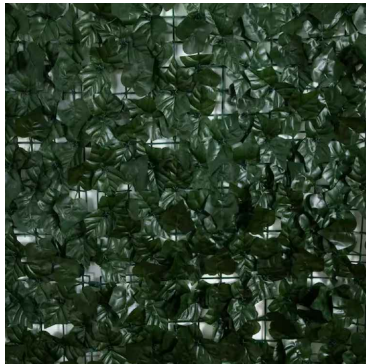
PROPOSED VERIZON WIRELESS GPS ANTENNA MOUNTED TO ICE BRIDGE POST

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11"x17" SCALE: 1/16" = 1'-0"
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SHEET TITLE: ELEVATIONS
 A5

						 FRONT VIEW  ENLARGED FRONT VIEW ENLARGED BACK VIEW PRODUCT SPECIFICATIONS: • PRODUCT DIMENSIONS: 120 IN. W X 1 IN. D X 40 IN. H • GREAT AS A PRIVACY SCREEN ON FENCES AND BALCONIES • UV TREATED, SAFE FOR INDOOR AND OUTDOOR USE • CRAFTED FROM PREMIUM MATERIALS, YOU'LL NOTICE THE ATTENTION TO DETAIL IN EVERY LEAF • EASY TO INSTALL, SIMPLY MEASURE YOUR SPACE AND USE ZIP TIES TO ATTACH • PROVIDES WEAR-RESISTANT GREENERY • FEATURES A TRELLIS BACKING FOR EASY PLACEMENT OVER STRUCTURES FOR A NATURAL PRIVACY SCREEN • QUICK AND STRAIGHTFORWARD SETUP OF YOUR NEW PRIVACY FENCE OR HEDGE • FRAME DIMENSIONS: 5 IN. H X 6 IN. W X 6 IN. D					
NOT USED	SCALE NONE	10	NOT USED	SCALE NONE	7						
						FAUX VINES					
						 Dark Dusted Foliage					
NOT USED	SCALE NONE	12	NOT USED	SCALE NONE	9	NOT USED	SCALE NONE	6	FOLIAGE	SCALE NONE	3

ISSUE STATUS

REV.	DATE	DESCRIPTION	BY
A	03/14/25	ISSUED FOR REVIEW	JR
0	04/18/25	ISSUED FOR ZONING	JR
1	06/30/25	FINAL POWER	JR
2	07/08/25	PLANNING COMMENTS	JR
3	03/16/26	PLANNING COMMENTS	APP

AD

ASSURANCE
DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

PROPRIETARY INFORMATION

THE INFORMATION CONTAINED IN THIS SET OF
DRAWINGS IS PROPRIETARY & CONFIDENTIAL TO
VERIZON WIRELESS

ANY USE OR DISCLOSURE OTHER THAN AS IT RELATES
TO VERIZON WIRELESS IS STRICTLY PROHIBITED

verticalbridge

750 PARK OF COMMERCE DR.
SUITE 200 | BOCA RATON, FL | 33487
561.948.6367

verizon

2770 SHADELANDS DRIVE,
BUILDING 11,
WALNUT CREEK, CA 94598

CLEAR CREEK WEST

US-CA-5906

FUZE PROJECT ID: 17457952

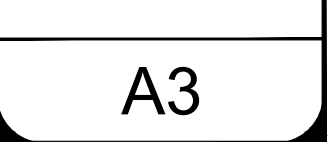
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6765 OAK ST
ANDERSON, CA 96007

SHEET TITLE:

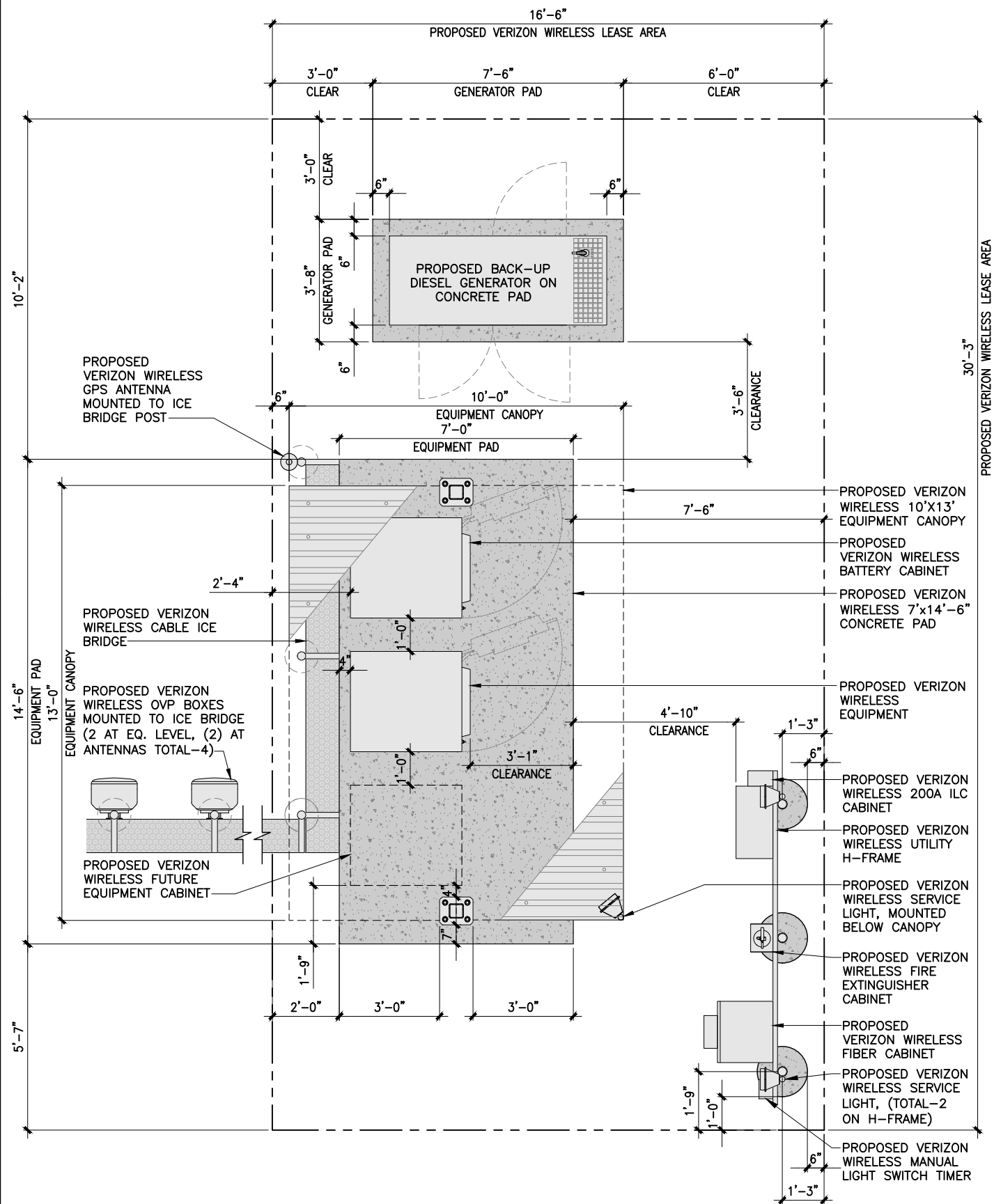
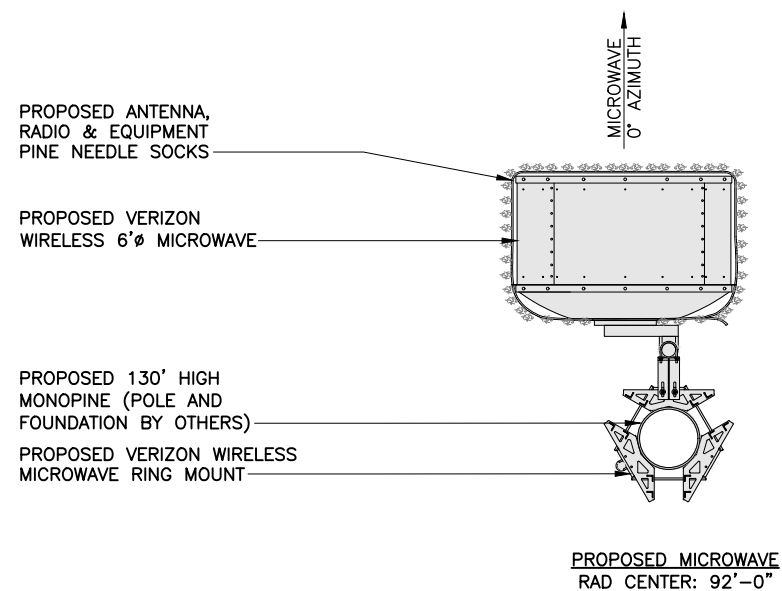
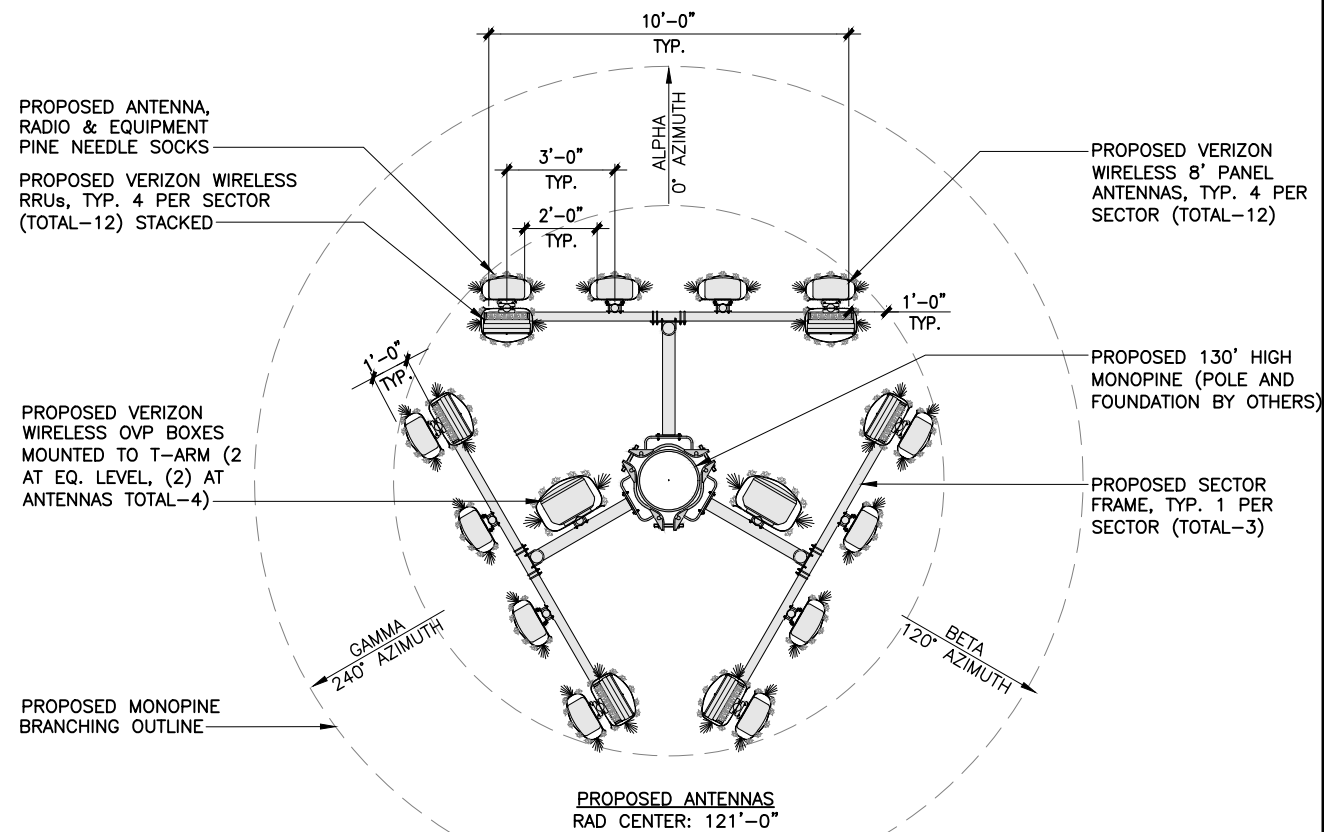
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DEVELOPMENT

1499 HUNTINGTON DR. | SUITE 305
SOUTH PASADENA, CA | 91030
626.765.5079

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verizon ✓
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CLEAR CREEK WEST
US-CA-5906
FUZE PROJECT ID: 17457952
MDG LOCATION ID: 5000918256
6765 OAK ST
ANDERSON, CA 96007

SHEET TITLE:

EQUIPMENT AND ANTENNA PLAN

A4

AERIAL MAP



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NO.	DATE	REVISIONS	BY
0	04/07/25	ISSUED FOR SUBMITTAL	JFY
1	08/02/25	CHANGE MONOPINE	JFY
2	10/06/25	ADD VIEWS	JFY
3	10/10/25	ADD FAUX VINES	JFY



US-CA-5906
CLEAR CREEK WEST
6765 OAK ST
ANDERSON, CA 96007

VIEW	SHEET
A	1 / 7

AERIAL MAP

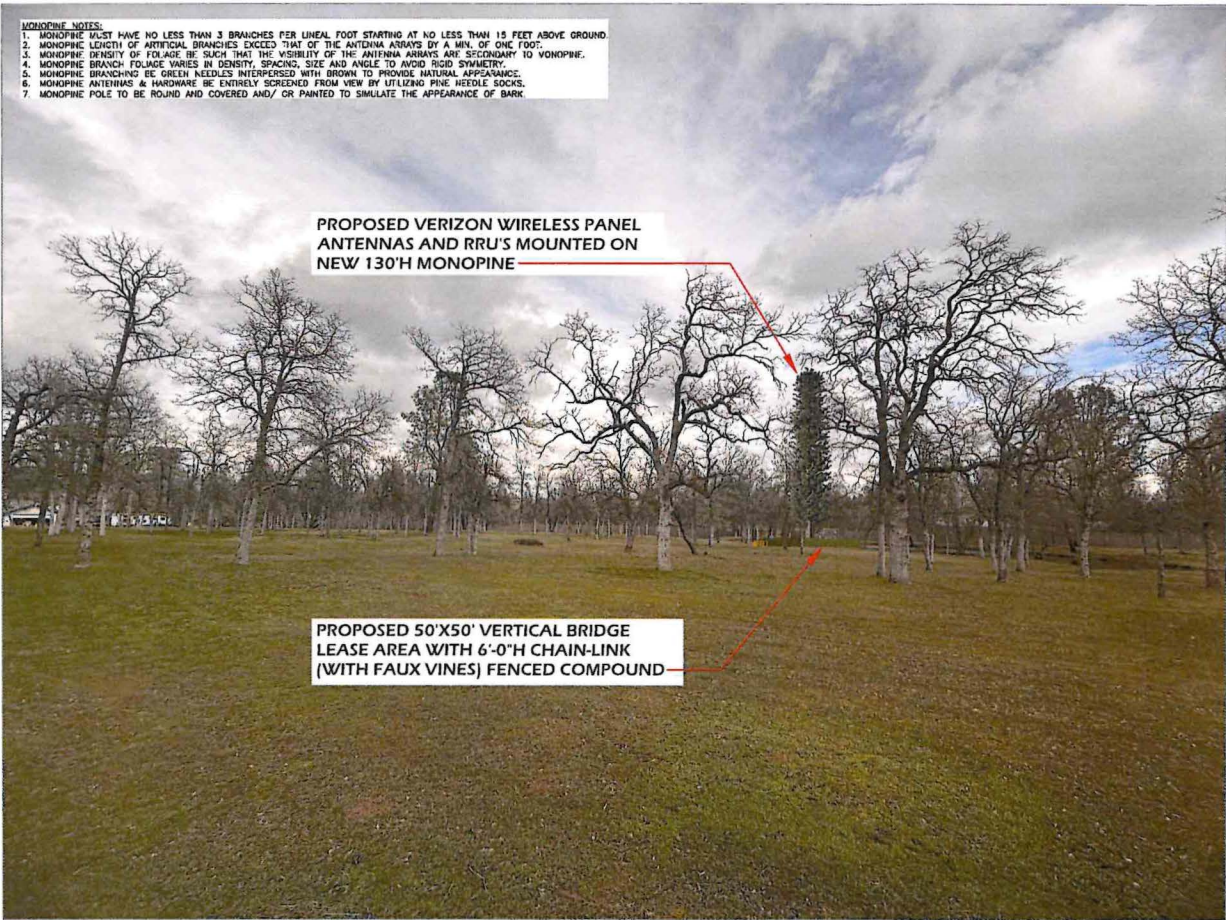


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DRAFTLINK
CONTACT : JOYCE YU
EMAIL : JOYCE@DRAFTLINK.COM
PHONE : 949-232-5045
WWW.DRAFTLINK.COM



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DEVELOPMENT**

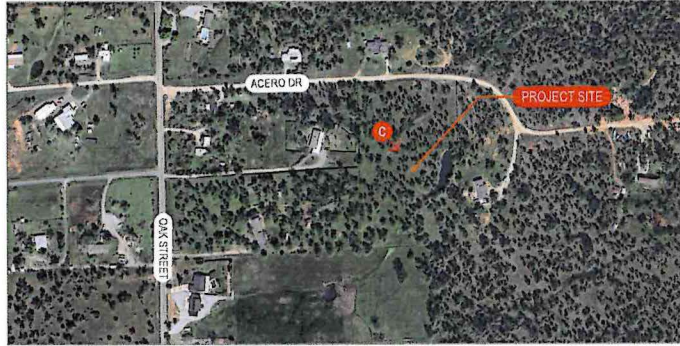
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**US-CA-5906
CLEAR CREEK WEST**
6765 OAK ST
ANDERSON, CA 96007

VIEW	SHEET
B	2 / 7

AERIAL MAP



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 DRAFTLINK CONTACT : JOYCE YU EMAIL : JOYCE@DRAFTLINK.COM PHONE : 949-232-5045 WWW.DRAFTLINK.COM	 ASSURANCE DEVELOPMENT	NO.	DATE	REVISIONS	BY	 	US-CA-5906 CLEAR CREEK WEST 6765 OAK ST ANDERSON, CA 96007	VIEW	SHEET
		0	04/09/25	ISSUED FOR SUBMITTAL	JFY			C	3 / 7
		1	08/02/25	CHANGE MONOPINE	JFY				
		2	10/06/25	ADD VIEWS	JFY				
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AERIAL MAP



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EXISTING



PROPOSED

- MONOPINE NOTES:**
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PROPOSED VERIZON WIRELESS PANEL ANTENNAS AND RRU'S MOUNTED ON NEW 130'H MONOPINE



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US-CA-5906
CLEAR CREEK WEST
6765 OAK ST
ANDERSON, CA 96007

VIEW

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4 / 7

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PROPOSED VERIZON WIRELESS PANEL ANTENNAS AND RRU'S MOUNTED ON NEW 130'H MONOPINE



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 CONTACT: JOYCE YU
 EMAIL: JOYCE@DRAFTLINK.COM
 PHONE: 949.232.5045
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 DEVELOPMENT

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1	08/02/25	CHANGE MONOPINE	JFY
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3	10/10/25	ADD FAUX VINES	JFY

verizon

verticalbridge

US-CA-5906
CLEAR CREEK WEST
 6765 OAK ST
 ANDERSON, CA 96007

VIEW

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SHEET

5 / 7

AERIAL MAP



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PROPOSED VERIZON WIRELESS PANEL ANTENNAS AND RRU'S MOUNTED ON NEW 130'H MONOPINE, CONCEALED BEHIND EXISTING TREES

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US-CA-5906
CLEAR CREEK WEST
6765 OAK ST
ANDERSON, CA 96007

VIEW

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6 / 7

AERIAL MAP



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US-CA-5906
CLEAR CREEK WEST
6765 OAK ST
ANDERSON, CA 96007

VIEW	SHEET
G	7 / 7

**PROJECT NARRATIVE
WCF USE PERMIT APPLICATION
CLEAR CREEK WEST, US-CA-5906**

Submitted to County of Shasta, California
Planning Division

Applicant: The Towers, LLC, known in California as the Towers of California, LLC
750 Park of Commerce Dr, Suite 200
Boca Raton, FL 33487
561.922.5688
Hubert.Kozlarzewski@verticalbridge.com

Co-Applicant: Airtouch Cellular d/b/a Verizon Wireless
2770 Shadelands Dr,
Walnut Creek, CA 94598

Representative: Assurance Development
1499 Huntington Dr, Ste 305
South Pasadena, CA 91030
Contact: Samantha Herrmann
626.760.6184
sherrmann@assurance-group.com

Property-Owner: Thomas R. Davis & Patty Hunt
PO Box 994343
Redding, CA 96099

Project Address: 6765 Oak St
Anderson, CA 96007

Description & Tax Lot: GPS Coordinates: 40.482338° / -122.451519°
Parcel No 205-310-012

Zoning Classification: R-R-T (Rural Residential-Mobile Home)

Assurance Development submits this application on behalf of The Towers, LLC known in California as the Towers of California, LLC ("The Towers, LLC") and Airtouch Cellular ("Verizon"), collectively referred to as the "Applicants," and the underlying property owner.

The Towers, LLC specializes in developing, constructing, leasing, and maintaining the physical components for wireless networks, including cellular towers. Infrastructure providers lay the physical groundwork that supports wireless communication networks. Wireless carriers, such as Verizon, lease space on this infrastructure to house their equipment and offer wireless services to end users. Through strategic partnerships with wireless carriers, The Towers, LLC allows the opportunity for multiple carriers to collocate onto a single tower and reduces the physical footprint of wireless facilities in the community.

1. REQUEST

Applicants seek a review and approval of an Use Permit application for their proposed Wireless Communication Facility ("WCF"). Included with this application are the following documents for review (collectively, "Applicants' Application").

Attachment 1:	Project Narrative (this document)
Attachment 2:	Statement of Code Compliance
Attachment 3:	Planning Division Master Application
Attachment 4:	Owner Letter of Authorization
Attachment 5:	Zoning Drawings
Attachment 6:	Verizon Coverage Maps
Attachment 7:	Alternative Sites Analysis
Attachment 8:	Photo Simulations
Attachment 9:	EME Report
Attachment 10:	Grant Deed
Attachment 11:	Title Report

2. PROJECT OVERVIEW

The Towers, LLC is proposing to build a new wireless telecommunications facility ("WCF" or "Facility"), Clear Creek West, US-CA-5906, at the above noted project address for the colocation of Verizon's equipment. This Facility is intended to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Shasta County, more specifically along Hawthorne Avenue and Cloverdale Road in Cloverdale.

As shown in Applicants' Application, this proposed project meets all applicable Shasta County Municipal Code criteria for siting new wireless telecommunications facilities and complies with all other applicable state and federal laws and regulations. The proposal is also the least intrusive mean of meeting Verizon's coverage objectives for this site. Accordingly, the

Applicants respectfully requests Shasta County Planning to approve this project as proposed, subject only to the County's standard conditions of approval.

3. PROPOSED PROJECT DETAILS

3.1. Location

Detailed information regarding the subject property and proposed lease area is included in **Attachment 5, Zoning Drawings**, to the Applicants' application.

3.1.1. Subject property. The subject property of this proposal is located at 6765 Oak St Anderson, CA 96007 in the County of Shasta (the "Property"). The Property is owned by Thomas R. Davis & Patty Hunt. The Property is zoned as R-R and is currently used primarily for residential dwelling.

3.1.2. Lease area.

- The proposed 50 x 50 ft lease area for the WCF is located in the eastern portion of the parcel, set back 321ft from the north, 161ft from the east, 278ft from the south, and 898ft from the west (the "Lease Area").
- The lease area will be surrounded by a 6ft high chain link fence with access to the lease area secured by a locked gate.

3.1.3. Access and parking. Access to the site is to be provided by a 874-foot-long graveled access road, with a fire turnaround apparatus adjacent to the lease area. Parking will be provided within the access road.

3.2. Wireless Facilities and Equipment

Specifications of the facilities outlined below, including a site plan, can be found in **Attachment 5, Zoning Drawings**, to Applicants' Application.

3.2.1. Support structure design. Applicants are proposing to build a new 130ft tall monopine (the "Tower") on the Property. This will be an unmanned wireless telecommunications facility.

3.2.2. Antennas and accessory equipment.

- The Tower will contain Verizon equipment (up to 12 panel antennas, 12 RRUs, and 4 new surge protectors, with all associated equipment).
- The antennas, RRUs, and accessory equipment on the Tower will be painted to match. All paint will have an anti-glare finish.
- Sufficient space will be made available on the Tower as required for future collocations. The proposed Verizon antenna centerline is 121 ft and the proposed antenna tip height is 125 ft.

3.2.3. Ground equipment.

- The Tower and all ground equipment will be constructed within the Lease Area.
- The ground equipment will be enclosed within ground mounted radio cabinets.

4. VERIZON NETWORK COVERAGE AND SERVICES

4.1. Overview—VERIZON 4G & 5G Coverage

Verizon is upgrading and expanding its wireless communications network to support the latest 4G LTE and 5G technology. 4G and 5G stand for “4th Generation” and “5th Generation” and LTE stands for “Long Term Evolution.” These acronyms refer to the ongoing process of improving wireless technology standards, now in its 5th generation. With each generation comes improvement in speed and functionality – 4G LTE offers speed up to ten times faster than 3G, and 5G can deliver speeds up to 20 Gbps in ideal conditions. That’s nearly 200 times faster than the 4G network.

Most American consumers currently experience wireless connectivity on 4G networks – and are aware of the profound impact on daily life that has occurred from this connectivity. The emerging standard in voice and data telecommunications – 5G – is poised to transform America’s reliance on densely populated wireless infrastructure.

5G is the latest iteration of cellular technology. While 5G technology operates on the same radio signals as current 4G/4G LTE networks, it is engineered to transmit data more efficiently. That means superior speeds and support for more connected devices than ever before. The ultra-low latency of 5G means quick response times during data-demanding activities.

There are several components of 5G wireless technology and separate bands of wavelength spectrum used to build a 5G network – low-band (<1GHz), mid-band (1-6GHz), and high-band millimeter wave (“mmWave”) (24 GHz and higher):

- **Low-Band Extended Range 5G.** Low-band 5G frequencies are also known as the “coverage layer.” Low-band 5G refers to frequencies below 1 GHz used to roll out substantial 5G coverage as quickly as possible. One example is the 600 MHz spectrum deployed by Verizon nationwide. A low-band cell site can cover hundreds of square miles and deliver a downlink data rate from 30-75 Mbps download—ideal for uses like streaming HD video. Because low-band signals easily pass through buildings, they offer solid coverage indoors and outdoors and are an effective way to connect parts of rural America where even fixed broadband speeds don’t always meet national benchmarks.
- **Mid-Band 5G.** Mid-range frequencies (spanning 1 GHz and 6 GHz) strike a balance between coverage and capacity. Mid-band 5G base stations can transmit and receive high-capacity signals over fairly large areas, and they can represent an ideal mix of performance for the bulk of 5G traffic in metropolitan areas.

- **High-Band mmWave 5G.** High-band 5G uses millimeter-wave (mmWave) frequency bands. High-band is a very specialized part of the 5G offering. Functioning over a shorter radius, it's particularly useful in urban areas and busy venues like stadiums and shopping malls. High-band can simultaneously provide many high-speed connections focused on an area of just a block or two, from a small cell site mounted close to street level.

Using these frequencies together can help Verizon's 5G network deliver the increased connectivity, reliability, speeds, and security the public demands. Upon completion, the Facility will become part of Verizon's statewide and nationwide communications network. See **Attachment 6, Verizon Coverage Maps.**

3.2 Coverage Objectives for Proposed Facility

This proposed Facility meets Verizon's coverage objectives providing in-vehicle and in-building wireless coverage within a geographic area not adequately served by Verizon's network. Specifically, this facility is intended to fill a significant gap in Verizon's 5G and 4G LTE coverage experienced by its customers in Shasta County, more specifically along Hawthorne Avenue and Cloverdale Road in the Cloverdale. Verizon has established a need for service in this geographic area, as determined by market demand, coverage requirements for a specific geographic area, and the need to provide continuous coverage from one site to another in a particular geographic region. The specific coverage objective was determined through a combined analysis of customer complaints, service requests, and radio frequency engineering design. This proposed Facility will allow for uninterrupted wireless service in the targeted coverage area with fewer dropped calls, improved call quality, and improved access to additional wireless services that the public now demands. This includes emergency 911 calls throughout the area (See **Attachment 6, Verizon Coverage Maps**).

5. SEARCH RING

Verizon's RF engineers performed an RF engineering study, considering multiple objectives, to determine the approximate site location and antenna height required to fulfill the noted network objectives for the targeted service area. From this study, Verizon's RF engineers identified a "search ring" area where a WCF may be located to provide effective service in the target coverage area.

See **Attachment 7, Alternative Sites Analysis** for a summary of the alternative site locations analyzed.

6. APPLICABLE LAW

6.1. Local Codes

New commercial WCFs in the County of Shasta are subject to a Zoning Permit, Administrative Permit, or Use Permit and must comply with the criteria in Section 17.88.282. See **Attachment 2, Statement of Code Compliance** for Applicants' demonstration of compliance with the applicable code.

6.2. State Law

Wireless telecommunication facilities that require discretionary review also require environmental review under the California Environmental Quality Act (CEQA). A discretionary project is one that requires the exercise of judgement or deliberation by a public agency in determining whether the project will be approved, or if a permit will be issued.

6.3. Federal Law

Federal law, primarily found in the Telecommunications Act of 1996 (“Telecom Act”), acknowledges a local jurisdiction’s zoning authority over proposed wireless facilities but limits the exercise of that authority in several important ways.

6.3.1. Local jurisdictions may not materially limit or inhibit. The Telecom Act prohibits a local jurisdiction from taking any action on a wireless siting permit that “prohibit[s] or [has] the effect of prohibiting the provision of personal wireless services.” 47 U.S.C. § 332(c)(7)(B)(i)(II). According to the Federal Communications Commission (“FCC”) Order adopted in September 2018,¹ a local jurisdiction’s action has the effect of prohibiting the provision of wireless services when it “materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.”² Under the FCC Order, an applicant need not prove it has a significant gap in coverage; it may demonstrate the need for a new wireless facility in terms of adding capacity, updating new technologies, and/or maintaining high quality service.³

While an applicant is no longer required to show a significant gap in service coverage, in the Ninth Circuit, a local jurisdiction clearly violates section 332(c)(7)(B)(i)(II) when it prevents a wireless carrier from using the least intrusive means to fill a significant gap in service coverage. *T-Mobile U.S.A., Inc. v. City of Anacortes*, 572 F.3d 987, 988 (9th Cir. 2009).

- **Significant Gap.** Reliable in-building coverage is now a necessity and every community’s expectation. Consistent with the abandonment of land line telephones and reliance on only wireless communications, federal courts now recognize that a “significant gap” can exist based on inadequate in-building coverage. See, e.g., *T-Mobile Central, LLC v. Unified Government of Wyandotte County/Kansas City*, 528 F. Supp. 2d 1128, 1168-69 (D.Kan. 2007), *affirmed in part*, 546 F.3d 1299 (10th Cir. 2008); *MetroPCS, Inc. v. City and County of San Francisco*, 2006 WL 1699580, *10-11 (N.D. Cal. 2006).

¹ *Accelerating Wireless and Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Declaratory Ruling and Third Report and Order, WT Docket No. 17-79, WC Docket No. 17-84, FCC 18-133 (rel. Sept. 27, 2018); 83 Fed. Reg. 51867 (Oct. 15, 2018), *affirmed in part and vacated in part*, *City of Portland v. United States*, 969 F.3d 1020 (9th Cir. 2020), *cert. denied*, 594 U.S. ___, 141 S.Ct. 2855 (June 28, 2021)(No. 20-1354) (“FCC Order”).

² *Id.* at ¶ 35.

³ *Id.* at ¶¶ 34-42.

- **Least Intrusive Means.** The least intrusive means standard “requires that the provider show that the manner in which it proposes to fill the significant gap in service is the least intrusive on the values that the denial sought to serve.” 572 F.3d at 995, *quoting MetroPCS, Inc. v. City of San Francisco*, 400 F.3d 715, 734 (9th Cir. 2005). These values are reflected by the local code’s preferences and siting requirements.

6.3.2. Environmental and health effects prohibited from consideration. Also under the Telecom Act, a jurisdiction is prohibited from considering the environmental effects of RF emissions (including health effects) of the proposed site if the site will operate in compliance with federal regulations. 47 U.S.C. § 332(c)(7)(B)(iv). The Applicants have included with this application an Electromagnetic Emissions Report demonstrating that the proposed facility will operate in accordance with the Federal Communications Commission’s RF emissions regulations. *See Attachment 9, EME Report.* Accordingly, this issue is preempted under federal law and any testimony or documents introduced relating to the environmental or health effects of the proposed facility should be disregarded in this proceeding.

6.3.3. No discrimination amongst providers. Local jurisdiction also may not discriminate amongst providers of functionally equivalent services. 47 U.S.C. § 332(c)(7)(B)(i)(I). A jurisdiction must be able to provide plausible reasons for disparate treatment of different providers’ applications for similarly situated facilities.

6.3.4. Shot Clock. Finally, the Telecom Act requires local jurisdictions to act upon applications for wireless communications sites within a “reasonable” period of time. 47 U.S.C. § 332(c)(7)(B)(ii). The FCC has issued a “Shot Clock” rule to establish a deadline for the issuance of land use permits for wireless facilities. 47 C.F.R. § 1.6001, *et seq.* According to the Shot Clock rule for “macro” wireless facilities, a reasonable period of time for local government to act on all relevant applications is 90 days for a collocation, with “collocation”⁴ defined to include an attachment to any existing structure regardless of whether it already supports wireless, and 150 days for a new structure.

The Shot Clock applies to all authorizations required for siting a wireless facility, including the building permit, and all application notice and administrative appeal periods.

Pursuant to federal law, the reasonable time period for review of this application is 150 days.

⁴ 47 C.F.R. § 1.6002(g).



Attachment 6A

Verizon Coverage Maps (Revised)

Best Server Plots

Without Clear Creek West



With Clear Creek West



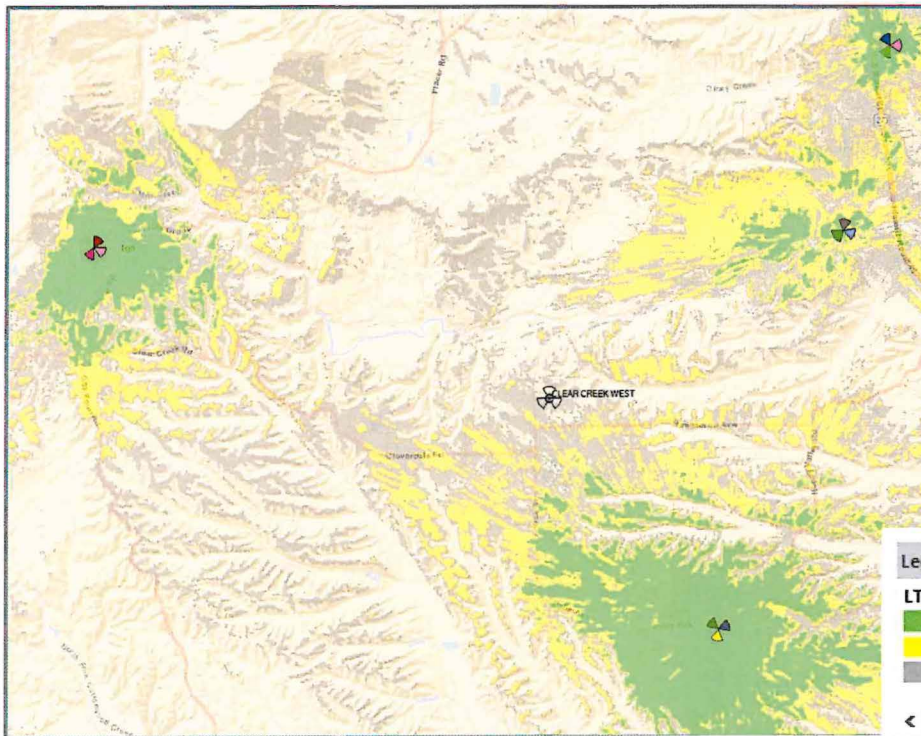
Pops Data

2100 MHz

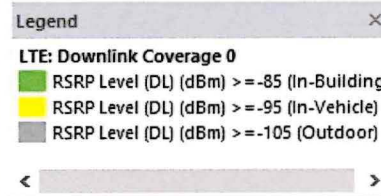
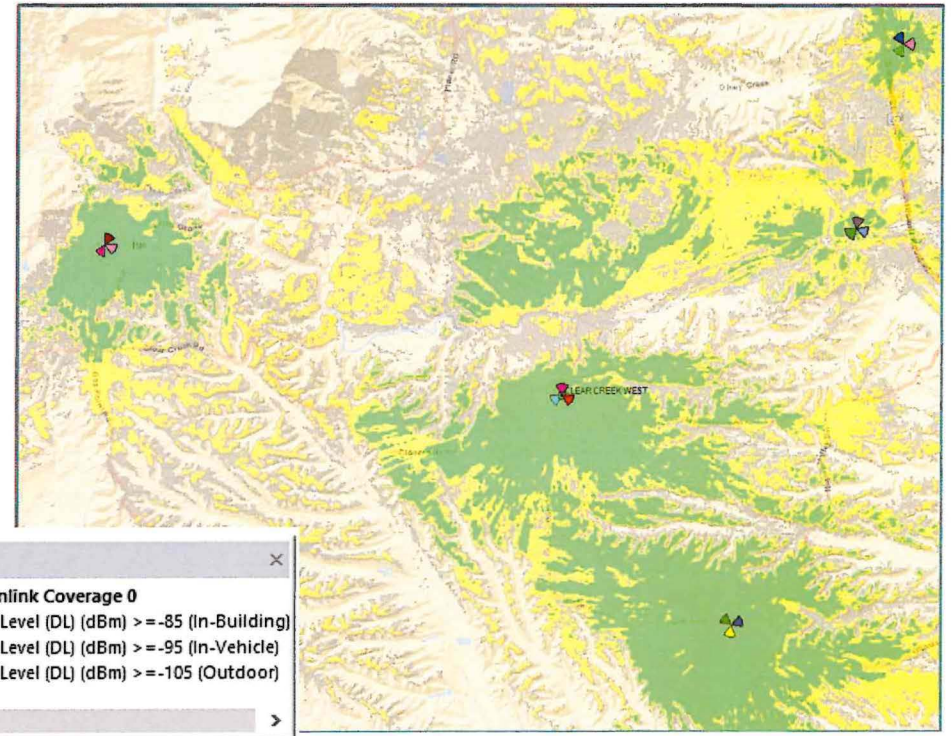
Legend	90FT RAD		121Ft RAD		Difference	
	Surface (km ²)	Population (Population)	Surface (km ²)	Population (Population)	Surface Delta	POPs Delta
	128.88089	11,906.91	134.145004	12,179.05	5.264114	272.13
In-Building Coverage	35.105396	3,258.03	38.5056	3,409.42	3.400204	151.39
In -Vehicle Coverage	73.726196	6,265.26	77.766296	6,433.96	4.0401	168.69
Outdoor Coverage	128.88089	11,906.91	134.145004	12,179.05	5.264114	272.13

AWS Coverage

Before Clear Creek West

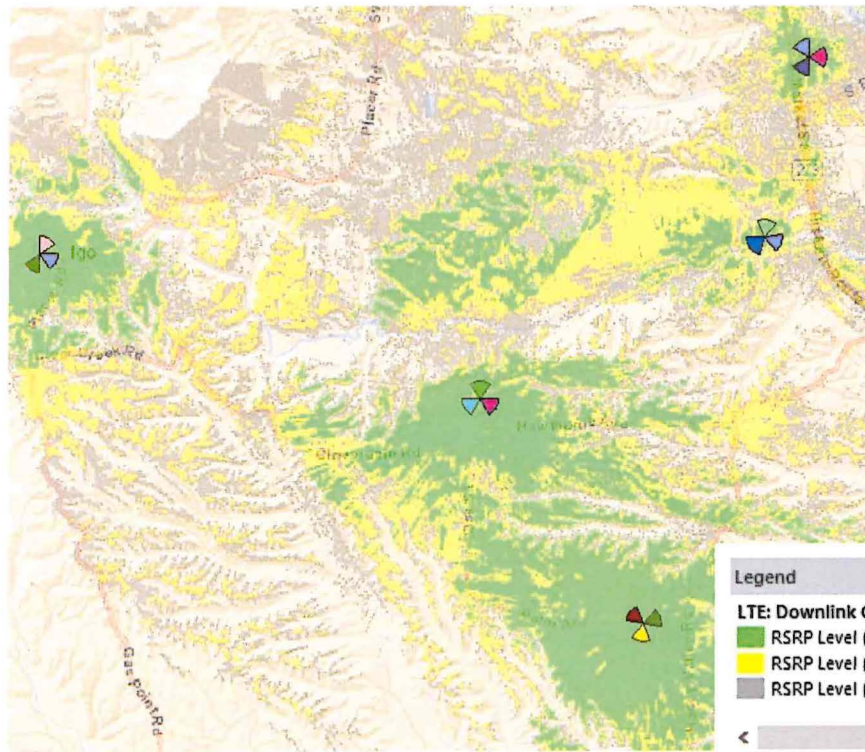


After Clear Creek West

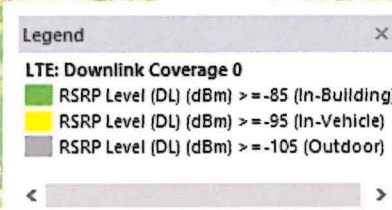
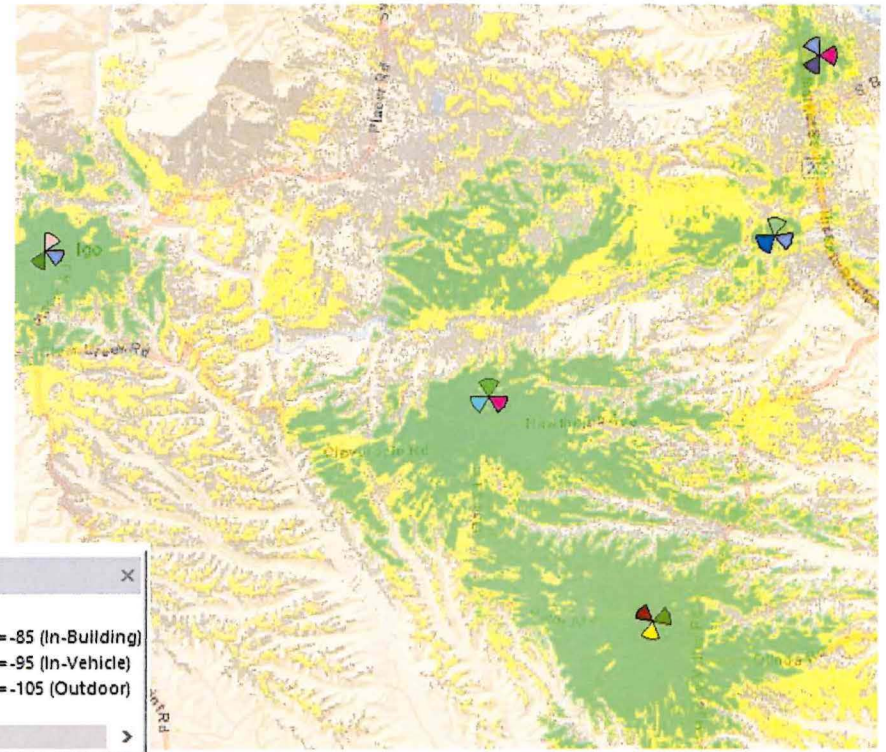


AWS Coverage

Clear Creek West at 90ft RAD



Clear Creek West at 121ft
RAD



Marco Dominguez

From: Matt Busher <mbusherhappyvalleyfire@gmail.com>
Sent: Tuesday, June 3, 2025 2:14 PM
To: Marco Dominguez
Subject: Re: New Cell Tower in Anderson (Shasta County)

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Hi Marco,
We have reviewed the plans and do not have any questions or concerns at this time.

Thank you,

Matt Busher
Fire Chief
Happy Valley Fire Protection District
Office: (530) 357-2345
Cell: (707) 834-3110
Email: mbusherhappyvalleyfire@gmail.com

On Mon, Jun 2, 2025 at 3:54 PM Marco Dominguez <mdominguez@shastacounty.gov> wrote:

Hello,

My name is Marco Dominguez, Assistant Planner with Shasta County. I am working on a Use Permit that will be located on a property under the Happy Valley Fire Protection District jurisdiction. The applicant is proposing to build a new 130 ft mono-pine cell tower; I have attached documents including a project narrative, various site plans, and elevations so you can see for yourself.

The Address is located at **6765 Oak St, in Anderson**. I'm getting ready to send an incomplete letter to the applicant by the end of the week and need to know if your department would have any issues/comments with the project. Please let me know if you need any additional information, I hope to hear from you soon, thank you.

Sincerely,

Marco Dominguez

Assistant Planner

Shasta County

Department of Resource Management

Planning Division

1855 Placer Street Suite 103

Redding, CA 96001

Ph: 530.225.5532

Fax: 530.245.6468

E-mail: mdominguez@shastacounty.gov

From: [Wildlife R1 CEQA Redding](#)
To: [Marco Dominguez](#)
Subject: RE: UP25-0002 Referral (Shasta County)
Date: Thursday, December 4, 2025 9:04:45 AM

EXTERNAL SENDER: Do not follow links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Thank you for contacting the California Department of Fish and Wildlife (CDFW).

Due to current staffing limitations and a high volume of incoming requests, CDFW is unable to provide comments on early scoping inquiries at this time. We are prioritizing the review of projects posted to the State Clearinghouse and regulatory submissions that may require formal response.

If your inquiry involves specific questions related to sensitive natural resources, species listed under the California Endangered Species Act, Lake and Streambed Alteration Program, or other Fish and Game Code regulatory requirements, please follow up with focused questions and we will respond as capacity allows.

Sincerely,
Habitat Conservation Program Staff

From: Marco Dominguez <mdominguez@shastacounty.gov>
Sent: Tuesday, November 25, 2025 8:49 AM
To: Wildlife R1 CEQA Redding <R1CEQARedding@wildlife.ca.gov>
Subject: UP25-0002 Referral (Shasta County)

You don't often get email from mdominguez@shastacounty.gov. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Good morning,

My name is Marco Dominguez, Assistant Planner at Shast County. I am working on Use Permit (UP25-0002) for a new mono-pine cell tower facility on a parcel that appears to have a pond. I have sent your office a referral packet with everything attached to this

email including project description, application, maps, and past studies. Please let me know if you have any comments or concerns and if you need anything else from me.

Sincerely,

Marco Dominguez
Assistant Planner

Shasta County
Department of Resource Management
Planning Division
1855 Placer Street Suite 103
Redding, CA 96001

Ph: 530.225.5532

Fax: 530.245.6468

E-mail: mdominguez@shastacounty.gov

California Historical Resources Information System

BUTTE
GLENN
LASSEN
MODOC
PLUMAS
SHASTA

SIERRA
SISKIYOU
SUTTER
TEHAMA
TRINITY

Northeast Information Center
1074 East Avenue, Suite F
Chico, California 95926
Phone (530) 898-6256
neinfocntr@csuchico.edu

December 22, 2025

County of Shasta Department
of Resource Management Planning Division
1855 Placer Street, Suite 103
Redding, CA 96001

IC File # NE25-533 Project Review

RE: Use Permit 25-0002
T30N, R5W, Section 5 MDBM
USGS Olinda 7.5' (1976) & Anderson 15' (1948) quadrangle maps
10 acres (Shasta County)

Marco Dominguez:

In response to your request, a records search for the project cited above was conducted by examining the official maps and records for cultural resources and surveys in Shasta County. Cultural resources in our inventory include archaeological objects, sites, landscapes, districts, and all manner of buildings and structures associated with past human activities. Please note that access to archaeological resource records is restricted to qualified individuals.

Results:

Archaeological Resources:

Resources within or adjacent to the project area:	No resources are located within the project area
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In addition, five resources have been recorded within the one-mile vicinity.

Built Environment Resources: According to our records, no resources of this type have been recorded within or adjacent to the project boundaries. The Built Environment Resources Directory (BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register

of Historic Places, does not list any properties within or adjacent to the proposed project area. The BERD is available online at: https://ohp.parks.ca.gov/?page_id=30338

Previous Investigations: According to our records, the project area has not been previously surveyed for cultural resources.

Historical Maps and Literature Search: The official records and maps for archaeological sites and surveys in Shasta County were reviewed. Also reviewed: **National Register of Historic Places - Listed properties and Determined Eligible Properties** (2022); **California Inventory of Historic Resources** (1976); **California Historical Landmarks** (2022); **Built Environment Resource Directory** (2022).

The USGS Olinda 7.5' (1976) & Anderson 15' (1948) quadrangle maps depict archaeological sensitive areas within the project's region such as structures, foundations, and waterways. Additional structures, foundations, and roadways; as well as waterways are located in the project vicinity.

The project is located in a region utilized by Wintu populations at the time of Euro-American contact. Indigenous populations used the local region for seasonal and/or permanent settlement, as well as for the gathering of plants, roots, seeds, domestic materials, and hunting seasonal game. Historically, Euro-Americans utilized the region for mining and transportation opportunities.

Sensitivity Assessment and Recommendations:

Based upon the above information and local topography, the project area is considered to have low sensitivity for cultural resources. Portions of the project along existing sites, roads, and trails are sensitive for archaeological resources. Other areas of sensitivity are flats near creeks, springs, seeps, or rock outcrops that may be located in the project area.

Therefore, because the project area has not been previously surveyed for archaeological resources, we recommend that a professional consultant be contacted prior to ground disturbance. The project archaeologist can offer recommendations for avoidance and protection of any existing or newly identified resources. If the proposed project contains buildings or structures that meet the minimum age requirement (45 years in age or older) it is recommended that the resources be assessed by a qualified specialist familiar with architecture and history of the county. Review of the available historic building/structure data has included only those sources listed above and should not be considered comprehensive. A list of qualified consultants is available online at www.chrisinfo.org.

During any phase of parcel development, if any archaeological resources are encountered, all work should cease in the area of the find pending an examination of the site and materials by the project archaeologist. This request to cease work in the area of a potential archaeological find is intended for accidental discoveries made during construction activities and is not intended as a substitute for the recommended cultural resources survey. It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the California Office of Historic Preservation (OHP): https://ohp.parks.ca.gov/?page_id=28351

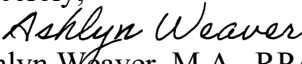
If human remains are discovered, California Health and Safety Code Section 7050.5 requires you to protect the discovery and notify the county coroner, who will determine if the find is Native American. If the remains are recognized as Native American, the coroner shall then notify the Native American Heritage Commission (NAHC). California Public Resources Code Section 5097.98 authorizes the NAHC to appoint a Most Likely Descendant (MLD) who will make recommendations for the treatment of the discovery.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Not all known cultural resources have been recorded and submitted to the OHP, so this record search should not be considered an exhaustive list of all cultural resources present in your project area. DPR forms and reports that are used for recording and evaluating sites and individual resources are submitted to the Northeast Information Center by private and public agencies. Please note that the Northeast Information Center is not responsible for misinformation of coordinates presented on the submitted DPR forms. If a discrepancy is found, please contact the lead agency for more information.

Due to processing delays and other factors, not all of the cultural resource reports and resource records that have been submitted to the OHP are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for cultural resource management work in the search area. Finally, Native American tribes have cultural resource information not in the CHRIS Inventory, and the NAHC should be contacted at (916) 373-3710 for information regarding Native American representatives in the vicinity of the project.

Thank you for your dedication to preserving California's irreplaceable cultural heritage. Please feel free to contact us if you have any questions or need any further information or assistance.

Sincerely,

Ashlyn Weaver, M.A., RPA
Coordinator & GIS Specialist
Northeast Information Center
(530) 898-6256