Negative Declaration & Notice Of Determination

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

ENVIRONMENTAL DETERMINATION NO. 17-071 **DATE:** December 6, 2018

PROJECT/ENTITLEMENT: AT&T Conditional Use Permit; DRC2017-00032

APPLICANT NAME: AT&T Mobility **Email:** jambrose@wireless01.com
ADDRESS: 3905 State Street, Suite 7-188, Santa Barbara, CA. 93105
CONTACT PERSON: Jerry Ambrose **Telephone:** 805-637-7407

PROPOSED USES/INTENT: Request by AT&T Mobility for a Conditional Use Permit to allow a new wireless communications facility consisting of twelve (12), 8' (8 foot) tall panel antennas, split into three (3) sectors of four (4) antennas each and ancillary antenna support equipment installed on one (1) 59-foot tall artificial eucalyptus tree (monoeucalyptus). The proposal also includes five (5) ground mounted equipment cabinets, one (1) backup generator, and an 6' 6" tall wooden fence enclosure within a 400 square foot lease area. The project will result in 1.89 acres of site disturbance on an 837 acre parcel.

LOCATION: The proposed project is within the Agriculture land use category and is located at 3905 Alisos Road, Arroyo Grande approximately 2.4 miles to the west of the City of Arroyo Grande. The site is in the Huasna-Lopez Sub Area of the South County planning area.

LEAD AGENCY:
County of San Luis Obispo
Dept of Planning & Building
976 Osos Street, Rm. 200
San Luis Obispo, CA 93408-2040
Website: http://www.sloplanning.org

STATE CLEARINGHOUSE REVIEW: YES ☒ **NO** ☐

OTHER POTENTIAL PERMITTING AGENCIES:

ADDITIONAL INFORMATION: Additional information pertaining to this Environmental Determination may be obtained by contacting the above Lead Agency address or (805)781-5600.
COUNTY "REQUEST FOR REVIEW" PERIOD ENDS AT .....4:30 p.m. December 20, 2018

30-DAY PUBLIC REVIEW PERIOD begins at the time of public notification

Notice of Determination

State Clearinghouse No. _____

This is to advise that the San Luis Obispo County_____ as ☐ *Lead Agency* ☐ *Responsible Agency* approved/denied the above described project on _____, and has made the following determinations regarding the above described project:

The project will not have a significant effect on the environment. A Negative Declaration was prepared for this project pursuant to the provisions of CEQA. Mitigation measures and monitoring were made a condition of approval of the project. A Statement of Overriding Considerations was not adopted for this project. Findings were made pursuant to the provisions of CEQA.

This is to certify that the Negative Declaration with comments and responses and record of project approval is available to the General Public at the 'Lead Agency' address above.

Signature	Project Manager Name	Date	Public Agency
	Stephanie Fuhs (sfuhs@co.slo.ca.us)		County of San Luis Obispo

Initial Study Summary – Environmental Checklist

SAN LUIS OBISPO COUNTY DEPARTMENT OF PLANNING AND BUILDING
976 OSOS STREET • ROOM 200 • SAN LUIS OBISPO • CALIFORNIA 93408 • (805) 781-5600

(ver 5.10)Using Form

Project Title & No. AT&T (Machado) Conditional Use Permit ED17-071 (DRC2017-00032)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The proposed project could have a "Potentially Significant Impact" for at least one of the environmental factors checked below. Please refer to the attached pages for discussion on mitigation measures or project revisions to either reduce these impacts to less than significant levels or require further study.

☒ Aesthetics	☒ Geology and Soils	☐ Recreation
☐ Agricultural Resources	☐ Hazards/Hazardous Materials	☐ Transportation/Circulation
☒ Air Quality	☐ Noise	☐ Wastewater
☒ Biological Resources	☐ Population/Housing	☐ Water /Hydrology
☐ Cultural Resources	☒ Public Services/Utilities	☐ Land Use

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the Environmental Coordinator finds that:

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

☒ 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.

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

☐ 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.

☐ 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.

Stephanie Fuhs (sfuhs@co.slo.ca.us) — Stephanie Fuhs — 11/29/18
Prepared by (Print) — Signature — Date

Steve McMasters — Steve McMasters — 11/28/18
Reviewed by (Print) — Signature(for) Environmental Coordinator — Date

Project Environmental Analysis

The County's environmental review process incorporates all of the requirements for completing the Initial Study as required by the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The Initial Study includes staff's on-site inspection of the project site and surroundings and a detailed review of the information in the file for the project. In addition, available background information is reviewed for each project. Relevant information regarding soil types and characteristics, geologic information, significant vegetation and/or wildlife resources, water availability, wastewater disposal services, existing land uses and surrounding land use categories and other information relevant to the environmental review process are evaluated for each project. Exhibit A includes the references used, as well as the agencies or groups that were contacted as a part of the Initial Study. The County Planning Department uses the checklist to summarize the results of the research accomplished during the initial environmental review of the project.

Persons, agencies or organizations interested in obtaining more information regarding the environmental review process for a project should contact the County of San Luis Obispo Planning Department, 976 Osos Street, Rm. 200, San Luis Obispo, CA, 93408-2040 or call (805) 781-5600.

A. PROJECT

DESCRIPTION: Request by AT&T Mobility for a Conditional Use Permit to allow a new wireless communications facility consisting of twelve (12), 8' (8 foot) tall panel antennas, split into three (3) sectors of four (4) antennas each and ancillary antenna support equipment installed on one (1) 59-foot tall artificial eucalyptus tree (monoeucalyptus). The proposal also includes five (5) ground mounted equipment cabinets, one (1) backup generator, and an 6' 6" tall wooden fence enclosure within a 400 square foot lease area. The project will result in 1.89 acres of site disturbance on an 837 acre parcel. The proposed project is within the Agriculture land use category and is located at 3905 Alisos Road, approximately 2.4 miles to the west of the City of Arroyo Grande. The site is in the Huasna-Lopez Sub Area of the South County planning area.

ASSESSOR PARCEL NUMBER(S): 047-031-030

Latitude: 35° 9' 1.4394" N Longitude: 120° 29' 29.94" **SUPERVISORIAL DISTRICT** # 4

B. EXISTING SETTING

PLAN AREA: South County **SUB**: Huasna-Lopez **COMM:**

LAND USE CATEGORY: Agriculture

COMB. DESIGNATION: Flood Hazard, Geologic Study

PARCEL SIZE: 837 acres

TOPOGRAPHY: Gently rolling to moderately sloping

VEGETATION: Grasses, shrubs, oaks, riparian

EXISTING USES: Agricultural uses, residence, agricultural accessory structures

SURROUNDING LAND USE CATEGORIES AND USES:

North: Agriculture/ Talley agricultural cluster subdivision	*East:* Agriculture/ Scattered residential development
South: Agriculture, Residential Rural/ Scattered residences and row crops	*West:* Rural Lands,Residential Rural/Scattered residences

C. ENVIRONMENTAL ANALYSIS

During the Initial Study process, at least one issue was identified as having a potentially significant environmental effects (see following Initial Study). Those potentially significant items associated with the proposed uses can be minimized to less than significant levels.

COUNTY OF SAN LUIS OBISPO
INITIAL STUDY CHECKLIST

1. AESTHETICS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Create an aesthetically incompatible site open to public view?	☐	☒	☐	☐
b) Introduce a use within a scenic view open to public view?	☐	☒	☐	☐
c) Change the visual character of an area?	☐	☒	☐	☐
d) Create glare or night lighting, which may affect surrounding areas?	☐	☐	☒	☐
e) Impact unique geological or physical features?	☐	☐	☐	☒
f) Other: _____	☐	☐	☐	☒

Aesthetics

Setting. The project site is located on an 837 acre parcel that is accessed off of Alisos Road approximately 2.4 miles east of the City of Arroyo Grande. The areas surrounding the parcel are primarily zoned Agriculture, Rural Lands and Residential Rural with scattered single-family homes and agricultural uses on parcels ranging from one to eighty acres. The parcels to the north are part of the Talley agricultural cluster subdivision and the project site abuts the open space/agricultural parcel for this subdivision. Parcels to the east and west contain scattered single-family residences. Parcels to the south contain single family residences with more intensive agricultural operations about ½ mile further south of the site. The subject property contains a single-family residence and agricultural accessory structures.

The topography of the site contains relatively flat areas with row crops toward the western portion of the property, with moderate to steep slopes to the east and west of the valley. Vegetation on the property consists of grasses, shrubs, coast live oak trees and row crops.

Regulatory Setting

The Land Use Ordinance establishes the following screening standard for wireless communications facilities:

All facilities shall be screened with vegetation or landscaping. Where screening with vegetation is not feasible, the facilities shall be disguised to resemble rural, pastoral architecture (ex: windmills, barns, trees) or other features determined to blend with the surrounding area and be finished in a texture and color deemed unobtrusive to the neighborhood in which it is located.

Conservation and Open Space Element Policy VR 9.3 states:

Locate, design and screen communications facilities, including towers, antennas, and associated equipment and buildings in order to avoid views of them in scenic areas, minimize their appearance and visually blend with the surrounding natural and built environments. Locate such facilities to avoid ridge tops where they would silhouette against the sky as viewed from major public view corridors and locations.

Conservation and Open Space Element Policy VR 9.4 states:

Encourage collocation of communications facilities (one or more carriers sharing a site, tower, or equipment) when feasible and where it would avoid or minimize adverse visual effects.

Impact. The applicant proposes to install a new wireless communications facility consisting of twelve (12), 8' (8 foot) tall panel antennas, split into three (3) sectors of four (4) antennas each and ancillary antenna support equipment installed on one (1) 59-foot tall artificial eucalyptus tree (monoeucalyptus). The proposal also includes five (5) ground mounted equipment cabinets, one (1) backup generator, and a 6' 6" tall wooden fence enclosure within a 400 square foot lease area. The proposed monoeucalyptus and AT&T Mobility lease area would be sited near the center of the subject property amongst an existing grove of coast live oak trees at the top of a knoll overlooking the Arroyo Grande Valley. This site was selected to provide context and a vegetative backdrop for the monoeucalyptus.

The proposed project could have a potentially significant impact on visual resources since it would introduce a new use that is visually incompatible with the character of the surrounding rural residential and agricultural landscape. The applicant submitted photo-simulations of the proposed facility from key viewing angles along Huasna Road. The photo-simulations demonstrate that the site will be visible from Huasna Road. However, since the facility is designed to appear like a eucalyptus, it would blend with the surrounding landscape (particularly, the backdrop of other deciduous trees) and would not attract attention. The monoeucalyptus would be taller than the existing coast live oak trees on the site, but the views of the site are distant and not distracting. This design is consistent with the goals of the County's communications facilities ordinance.

The proposed lease area would not be easily visible from the public view points because the fenced area has been sited within the grove of oak trees which will provide screening of the proposed equipment.

Mitigation/Conclusion. Although the proposed communications facility is not a use that is inherently compatible with the character of the surrounding rural landscape, the proposed project is a stealth design that would blend with existing natural features of the landscape (particularly, the existing grove of coast live oak trees). Since the proposed facility would visually blend with the landscape, it would not be readily discernible as a wireless communications facility. This is consistent with the visual screening standard for wireless communications facilities which requires facilities to either be completely screened by vegetation or disguised to resemble natural or built features of the landscape.

In order to reduce visual impacts, the project is subject to mitigation measures that require the applicant to use the most realistic appearing monoeucalyptus structure, with an organic and non-symmetrical form, and realistic bark texture and foliage colors. In addition, the applicant is required to submit material and color test samples of all visual elements of the monoeucalyptus.

These measures, discussed in detail in the mitigation summary table (Exhibit B), would reduce the project's potential visual impacts to a level of insignificance.

2. AGRICULTURAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Convert prime agricultural land, per NRCS soil classification, to non-agricultural use?	☐	☐	☐	☒
b) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use?	☐	☐	☐	☒
c) Impair agricultural use of other property or result in conversion to other uses?	☐	☐	☒	☐
d) Conflict with existing zoning for agricultural use, or Williamson Act program?	☐	☐	☐	☒
e) Other: _____	☐	☐	☐	☒

Agricultural Resources

Setting. Project Elements. The following area-specific elements relate to the property's importance for agricultural production:

Land Use Category: Agriculture

State Classification: Not prime farmland, Farmland if irrigated

Historic/Existing Commercial Crops: Rotational Crops

In Agricultural Preserve? Yes, AG Valley Ag Preserve Area

Under Williamson Act contract? No

The soil type(s) and characteristics on the subject property include:

Diablo and Cibo clays (15 - 30 % slope).

Diablo. This moderately sloping clayey soil is considered very poorly drained. The soil has moderate erodibility and high shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, slow percolation. The soil is considered Class IV without irrigation and Class is not rated when irrigated.

Lodo clay loam (30 - 50 % slope). This steeply sloping, shallow fine loamy soil is considered very poorly drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Lodo-Rock outcrop complex (9 - 30% slope). This moderately sloping, shallow fine loamy soil is considered very poorly drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Lopez very shaly clay loam (30 - 75% slope). This steeply to very steeply sloping, shallow gravelly fine loamy soil is considered very poorly drained. The soil has low erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: shallow depth to bedrock. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

Salinas silty clay loam (0 - 2 % slope). This nearly level fine loamy bottom soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class III without irrigation and Class I when irrigated.

Santa Lucia shaly clay loam (30 - 50% slope). This steeply sloping, north-slope gravelly fine loamy soil is considered not well drained. The soil has low erodibility and low shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock. The soil is considered Class VI without irrigation and Class is not rated when irrigated.

Still gravelly sandy clay loam (0 - 2% slope). This nearly level gravelly fine loamy soil is considered moderately drained. The soil has moderate erodibility and moderate shrink-swell characteristics, aswould not affect the ag well as having potential septic system constraints due to: poor filtering capabilities, slow percolation. The soil is considered Class III without irrigation and Class II when irrigated.

The project site is in the Agriculture land use category and contains an area of row crops on the flatter portion of the property.

Impact. The project is located in a 400 square foot lease area with the only agricultural activities occurring on the subject property and on the adjacent property to the west, approximately 1,400 feet away. The installation and operation of the proposed communications facility would not affect the agricultural activities or resources on the property.

Mitigation/Conclusion. Based on the above discussion, and the proposed facility being unmanned, no mitigation measures are considered necessary.

3. AIR QUALITY *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?	☐	☐	☒	☐
b) Expose any sensitive receptor to substantial air pollutant concentrations?	☐	☐	☒	☐
c) Create or subject individuals to objectionable odors?	☐	☐	☒	☐
d) Be inconsistent with the District's Clean Air Plan?	☐	☐	☒	☐
e) Result in a cumulatively considerable net increase of any criteria pollutant either considered in non-attainment under applicable state or federal ambient air quality standards that are due to increased energy use or traffic generation, or intensified land use change?	☐	☐	☒	☐
GREENHOUSE GASES				
f) ***Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***	☐	☐	☒	☐

3. AIR QUALITY *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
g) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
h) Other: *Naturally Occurring Asbestos*	☐	☒	☐	☐

Air Quality

Setting. The Air Pollution Control District (APCD) has developed and updated their CEQA Air Quality Handbook (2012) to evaluate project specific impacts and help determine if air quality mitigation measures are needed, or if potentially significant impacts could result. To evaluate long-term emissions, cumulative effects, and establish countywide programs to reach acceptable air quality levels, a Clean Air Plan has been adopted (prepared by APCD).

The project proposes to disturb soils that have been given a wind erodibility rating of 4-8, which is considered "moderate" to "high".

Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature. This is commonly referred to as global warming. The rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system. This is also known as climate change. These changes are now thought to be broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

The passage of AB32, the California Global Warming Solutions Act (2006), recognized the need to reduce GHG emissions and set the greenhouse gas emissions reduction goal for the State of California into law. The law required that by 2020, State emissions must be reduced to 1990 levels. This is to be accomplished by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions. Subsequent legislation (e.g., SB97-Greenhouse Gas Emissions bill) directed the California Air Resources Board (CARB) to develop statewide thresholds.

In March 2012, the San Luis Obispo County Air Pollution Control District (APCD) approved thresholds for GHG emission impacts, and these thresholds have been incorporated the APCD's CEQA Air Quality Handbook. APCD determined that a tiered process for residential / commercial land use projects was the most appropriate and effective approach for assessing the GHG emission impacts. The tiered approach includes three methods, any of which can be used for any given project:

1. Qualitative GHG Reduction Strategies (e.g. Climate Action Plans): A qualitative threshold that is consistent with AB 32 Scoping Plan measures and goals; or,
2. Bright-Line Threshold: Numerical value to determine the significance of a project's annual GHG emissions; or,
3. Efficiency-Based Threshold: Assesses the GHG impacts of a project on an emissions per capita basis.

For most projects the Bright-Line Threshold of 1,150 Metric Tons CO2/year (MT CO2e/yr) will be the most applicable threshold. In addition to the residential/commercial threshold options proposed above, a bright-line numerical value threshold of 10,000 MT CO2e/yr was adopted for stationary source (industrial) projects.

It should be noted that projects that generate less than the above mentioned thresholds will also participate in emission reductions because air emissions, including GHGs, are under the purview of the California Air Resources Board (or other regulatory agencies) and will be "regulated" either by CARB, the Federal Government, or other entities. For example, new vehicles will be subject to increased fuel economy standards and emission reductions, large and small appliances will be subject to more strict emissions standards, and energy delivered to consumers will increasingly come from renewable sources. Other programs that are intended to reduce the overall GHG emissions include Low Carbon Fuel Standards, Renewable Portfolio standards and the Clean Car standards. As a result, even the emissions that result from projects that produce fewer emissions than the threshold will be subject to emission reductions.

Under CEQA, an individual project's GHG emissions will generally not result in direct significant impacts. This is because the climate change issue is global in nature. However, an individual project could be found to contribute to a potentially significant cumulative impact. Projects that have GHG emissions above the noted thresholds may be considered cumulatively considerable and require mitigation.

Impact. As proposed, the project will result in the disturbance of approximately 1.89 acres for access improvements and installation of the wireless facility. This will result in the creation of construction dust, as well as short- and long-term vehicle emissions. The project will be moving less than 1,200 cubic yards/day of material and will disturb less than four acres of area, and therefore will be below the general thresholds triggering construction-related mitigation. The project is also not in close proximity to sensitive receptors that might otherwise result in nuisance complaints and be subject to limited dust and/or emission control measures during construction.

The project site contains an active fault line running generally north-south and has the potential for naturally occurring asbestos (NOA). Grading within soils containing NOA can cause asbestos to become airborne. Proper measures during ground disturbing activities are necessary if NOA is determined to be present in order to mitigate any impacts associated with such grading.

From an operational standpoint, based on Table 1-1 of the CEQA Air Quality Handbook (2012), the project will not exceed operational thresholds triggering mitigation. The project is consistent with the general level of development anticipated and projected in the Clean Air Plan. No significant air quality impacts are expected to occur.

This project is the installation of a 59-foot tall monoeucalyptus, equipment shelter, 6-foot, six inch tall fence, stand-by emergency generator, and associated equipment. Using the GHG threshold information described in the Setting section, the project is expected to generate less than the Bright-Line Threshold of 1,150 metric tons of GHG emissions. Therefore, the project's potential direct and cumulative GHG emissions are found to be less significant and less than a cumulatively considerable contribution to GHG emissions. Section 15064(h)(2) of the CEQA Guidelines provide guidance on how to evaluate cumulative impacts. If it is shown that an incremental contribution to a cumulative impact, such as global climate change, is not 'cumulatively considerable', no mitigation is required. Because this project's emissions fall under the threshold, no mitigation is required.

Mitigation/Conclusion. Mitigation measures have been added to have a geologist perform sampling prior to any site disturbance to determine if NOA is present within the areas proposed for grading. If present, the applicant shall follow the recommendations of the geologist and provide a plan for controlling potential asbestos containing dust. In addition, a disclosure measure has been included regarding developmental burning.

4. BIOLOGICAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Result in a loss of unique or special status species* or their habitats?	☐	☐	☒	☐
b) Reduce the extent, diversity or quality of native or other important vegetation?	☐	☒	☐	☐
c) Impact wetland or riparian habitat?	☐	☐	☒	☐
d) Interfere with the movement of resident or migratory fish or wildlife species, or factors, which could hinder the normal activities of wildlife?	☐	☐	☒	☐
e) Conflict with any regional plans or policies to protect sensitive species, or regulations of the California Department of Fish & Wildlife or U.S. Fish & Wildlife Service?	☐	☐	☒	☐
f) Other: _____	☐	☐	☐	☒

* **Species – as defined in Section15380 of the CEQA Guidelines, which includes all plant and wildlife species that fall under the category of rare, threatened or endangered, as described in this section.**

Biological Resources

Setting. The following are existing elements on or near the proposed project relating to potential biological concerns:

On-site Vegetation: Grasses, shrubs, scattered oaks, row crops

Name and distance from blue line creek(s): One unnamed "blue line" tributary to the Tar Spring Creek courses through the subject property. One unnamed "blue line" tributary to unnamed pond course through the subject property.

Habitat(s): The project is within an area considered suitable for Pismo clarkia

Site's tree canopy coverage: Approximately 25%

The Natural Diversity Database (or other biological references) identified the following species potentially existing within approximately one mile of the proposed project:

Habitats: The project is within an area considered suitable for Pismo clarkia.

Vegetation:

Santa Margarita manzanita (*Arctostaphylos pilosula*) List 1B

Slender bush-mallow (*Malacothamnus gracilis) List 1B*

Pismo clarkia (*Clarkia speciosa ssp. immaculata*) FE, SR, List 1B

The potential for the Pismo clarkia *(Clarkia speciosa ssp. immaculata)* has been identified about 0.2 miles to the west and 0.5 miles to the north.

Wildlife:

Coast horned lizard (*Phrynosoma coronatum frontale*) CSC

Impact. Since the property is over 800 acres, a biological report was prepared for the areas of the property that will be disturbed by the facility and access/utility improvements and areas potentially impacted by these activities. The report found no Pismo Clarkia on or in the vicinity of the project site.

The botanical report (Environmental Assessment Specialists, Inc.; 4/30/18, 11/16/17) indicates that there is a potential for sensitive plants to occur on the project site, but since the grading plans for the access road are preliminary and subject to change, it was recommended that a focused survey based on the final grading plans be completed prior to issuance of construction permits. The only sensitive plant species that were observed during the survey were coast live oaks which are scattered throughout the site, but primarily in the area of the proposed wireless facility in order to provide screening of the proposed monoeucalyptus.

The preliminary site plan shows one oak tree to be removed; however, site disturbance will be within the dripline of five oak trees.

The oak woodland areas of the site provide suitable habitat for nesting birds. Removal of trees during nesting season should be avoided to protect migratory bird species. Fish and Game Code 3503 protects birds, their eggs and nests from disturbance or destruction from construction activities.

Mitigation/Conclusion. Mitigation is proposed to address oak trees that will be removed and/or impacted by this project. Also, mitigation measures are proposed for a focused botanical survey to be conducted prior to issuance of construction permits to determine the presence or absence of special status plant species along with appropriate avoidance and/or restoration measures. In addition, a measure regarding removal of vegetation or any other ground disturbance between February 15 and September 15 to avoid impacts to native breeding and nesting birds is included. If construction activities during this period cannot be avoided, a county-approved biologist shall survey all breeding and nesting habitat on the site and adjacent sites for breeding and/or nesting birds no more than two weeks prior to construction or site disturbance activities. Results of the surveys shall be submitted to the Department of Fish and Wildlife (CDFW) for concurrence with the report. If nesting and/or breeding birds are found, appropriate mitigation measures shall be developed in consultation with the CDFW such as providing an appropriate avoidance buffer to be located and monitored by a qualified biologist, and the applicant shall adhere to these measures during all construction activities on the site. These measures, discussed in detail in the mitigation summary table (Exhibit B), would reduce the project's potential biological impacts to a level of insignificance.

5. CULTURAL RESOURCES *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Disturb archaeological resources?	☐	☐	☒	☐
b) Disturb historical resources?	☐	☐	☒	☐
c) Disturb paleontological resources?	☐	☐	☒	☐
d) Cause a substantial adverse change to a Tribal Cultural Resource?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☒

Cultural Resources

Setting. The project is located in an area historically occupied by the Chumash . No historic structures are present and no paleontological resources are known to exist in the area.

The project is within 300 feet of a blue line creek. Potential for the presence or regular activities of the Native American increases in close proximity to reliable water sources.

In order to meet AB52 Cultural Resources requirements, outreach to four Native American tribes groups had been conducted (Northern Salinan, Xolon Salinan, Yak Tityu Tityu Northern Chumash, and the Northern Chumash Tribal Council). Comments were received from one of the tribal groups on (February 12, 2018) requesting a site visit as part of the consultation process. Upon review of the cultural resource assessment, no further review was needed by the tribal group.

Impact. A Phase I Cultural Resource Assessment was conducted (Helix Environmental Planning, Inc., December 2017). No evidence of cultural materials was noted on the property. Per AB52, tribal consultation was performed and no resources were identified. Impacts to historical or paleontological resources are not expected.

Mitigation/Conclusion. No significant cultural resource impacts are expected to occur, and no mitigation measures are necessary.

6. GEOLOGY AND SOILS *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Result in exposure to or production of unstable earth conditions, such as landslides, earthquakes, liquefaction, ground failure, land subsidence or other similar hazards?	☐	☐	☒	☐
b) Be within a California Geological Survey "Alquist-Priolo" Earthquake Fault Zone", or other known fault zones*?	☐	☒	☐	☐
c) Result in soil erosion, topographic changes, loss of topsoil or unstable soil conditions from project-related improvements, such as vegetation removal, grading, excavation, or fill?	☐	☒	☐	☐
d) Include structures located on expansive soils?	☐	☐	☐	☒
e) Be inconsistent with the goals and policies of the County's Safety Element relating to Geologic and Seismic Hazards?	☐	☐	☒	☐
f) Preclude the future extraction of valuable mineral resources?	☐	☐	☒	☐
g) Other: *Naturally occurring asbestos*	☐	☒	☐	☐

* **Per Division of Mines and Geology Special Publication #42**

Setting. The following relates to the project's geologic aspects or conditions:

Topography: Nearly level to steeply sloping

Within County's Geologic Study Area?: Yes

Landslide Risk Potential: Low to Very High

Liquefaction Potential: Low to moderate

Nearby potentially active faults?: Yes Distance? Within site boundaries

Area known to contain serpentine or ultramafic rock or soils?: Yes

Shrink/Swell potential of soil: Low to high

Other notable geologic features? None

Geology and Soils

The project is within the Geologic Study area designation and is subject to the preparation of a geological report per the County's Land Use Ordinance [LUO section 22.14.070 (c)] to evaluate the area's geological stability.

A sedimentation and erosion control plan is required for all construction and grading projects (LUO Sec. 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts.

GIS mapping shows a capable fault within a couple hundred feet of the proposed wireless facility and that the soils on the project site may contain naturally occurring asbestos.

Impact/Mitigation/Conclusion. As proposed, the project will result in the disturbance of approximately 1.89 acres for access improvements and installation of the monoeucalyptus and support equipment. No habitable structures are proposed as part of the project, however, the capable fault and naturally occurring asbestos will need to be evaluated by a qualified geologist in order to avoid placement of the monoeucalyptus in an area where soil related hazards could occur.

As discussed under the Air Quality section above, mitigation measures have been added to have a geologist perform sampling prior to any site disturbance to determine if NOA is present within the areas proposed for grading. If present, the applicant shall follow the recommendations of the geologist. In addition, the fault zone shall be shown on all applicable construction plans and under Chapter 18 of the California Building Code, the project will be required to submit a soils engineering report with the construction permit application and to implement the recommendations of the report. There is no evidence that measures above what will already be required by ordinance or codes are needed.

7. HAZARDS & HAZARDOUS MATERIALS - ***Will the project:***	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on, or adjacent to, a site which is included on a list of hazardous material/waste sites compiled pursuant to Gov't Code 65962.5 ("Cortese List"), and result in an adverse public health condition?	☐	☐	☐	☒
e) Impair implementation or physically interfere with an adopted emergency response or evacuation plan?	☐	☐	☒	☐
f) If within the Airport Review designation, or near a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Increase fire hazard risk or expose people or structures to high wildland fire hazard conditions?	☐	☐	☒	☐
h) Be within a 'very high' fire hazard severity zone?	☐	☐	☒	☐
i) Be within an area classified as a 'state responsibility' area as defined by CalFire?	☐	☐	☒	☐
j) Other: _____	☐	☐	☐	☐

Hazards and Hazardous Materials

Setting. The project is not located in an area of known hazardous material contamination. The project is not within a 'high' or 'very high' severity risk area for fire. The project is not within the Airport Review area.

With regards to potential fire hazards, the subject project is within the Moderate to High Fire Hazard Severity Zone(s). Based on the County's fire response time map, it will take approximately 10-20 minutes to respond to a call regarding fire or life safety. Refer to the Public Services section for further discussion on Fire Safety impacts.

Impact. The project does not propose the use of hazardous materials, nor the generation of hazardous wastes. The proposed project is not found on the 'Cortese List' (which is a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5). The project does not present a significant fire safety risk. The project is not expected to conflict with any regional emergency response or evacuation plan.

The applicant supplied a report to evaluate the proposed communications facility for compliance with appropriate guidelines limiting human exposure to radio frequency electromagnetic fields. According to the RF report for this project (EBI Consulting, October 25, 2017), the maximum level of RF emissions from the proposed facility at ground-level would be equivalent to five percent of the applicable public exposure limit and one percent of the occupational limit.

Mitigation/Conclusion. No significant impacts as a result of hazards or hazardous materials are anticipated, and no mitigation measures are necessary.

8. NOISE *Will the project:*	**Potentially Significant**	**Impact can & will be mitigated**	**Insignificant Impact**	**Not Applicable**
a) Expose people to noise levels that exceed the County Noise Element thresholds?	☐	☐	☐	☒
b) Generate permanent increases in the ambient noise levels in the project vicinity?	☐	☐	☒	☐
c) Cause a temporary or periodic increase in ambient noise in the project vicinity?	☐	☐	☒	☐
d) Expose people to severe noise or vibration?	☐	☐	☐	☒
e) If located within the Airport Review designation or adjacent to a private airstrip, expose people residing or working in the project area to severe noise levels?	☐	☐	☐	☒
f) Other: _____	☐	☐	☐	☒

Noise

Setting. The proposed unmanned wireless communications facility is not considered a sensitive noise receptor. The project is not within close proximity of loud noise sources, and will not conflict with any sensitive noise receptors (e.g., residences). The nearest offsite sensitive noise receptor to the project is an existing residence east of the proposed lease area, which is approximately 2,000 feet away.

Impact. Based on the Noise Element's projected future noise generation from known stationary and vehicle-generated noise sources, the project is within an acceptable threshold area. As a standard condition of approval to ensure the project will not conflict with any sensitive noise receptors, HVAC units if installed as part of the equipment, shall be sound attenuated to meet applicable County and State exterior noise standards. The project shall be maintained in compliance with the County Noise Element (including backup generators). The backup generator shall have a noise baffle cover and shall not exceed a maximum noise level of 65 dbl. at a distance of 50 feet from the generator. The project is not expected to generate loud noises, nor conflict with the surrounding uses.

Mitigation/Conclusion. No significant noise impacts are anticipated, and no measures beyond ordinance requirements are necessary.

9. POPULATION/HOUSING *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Induce substantial growth in an area either directly (e.g., construct new homes or businesses) or indirectly (e.g., extension of major infrastructure)?	☐	☐	☒	☐
b) Displace existing housing or people, requiring construction of replacement housing elsewhere?	☐	☐	☒	☐
c) Create the need for substantial new housing in the area?	☐	☐	☒	☐
d) Other: _____	☐	☐	☐	☒

Population/Housing

Setting In its efforts to provide for affordable housing, the County currently administers the Home Investment Partnerships (HOME) Program and the Community Development Block Grant (CDBG) program, which provides limited financing to projects relating to affordable housing throughout the county. The County's Inclusionary Housing Ordinance requires provision of new affordable housing in conjunction with both residential and nonresidential development and subdivisions.

Impact. The project will not result in a need for a significant amount of new housing, and will not displace existing housing.

Mitigation/Conclusion. No significant population and housing impacts are anticipated. No mitigation measures are necessary.

10. PUBLIC SERVICES/UTILITIES *Will the project have an effect upon, or result in the need for new or altered public services in any of the following areas:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Fire protection?	☐	☒	☐	☐
b) Police protection (e.g., Sheriff, CHP)?	☐	☒	☐	☐
c) Schools?	☐	☐	☒	☐
d) Roads?	☐	☐	☒	☐
e) Solid Wastes?	☐	☐	☐	☒
f) Other public facilities?	☐	☐	☐	☒
g) Other: _____	☐	☐	☐	☒

Setting. The project area is served by the following public services/facilities:

Police: County Sheriff South Patrol Location: (Approximately 9 miles to the West)

Fire: Cal Fire (formerly CDF) Hazard Severity: Moderate to High Response Time: 10-20 minutes
Pismo Beach

Location: (Approximately 13 miles to the West)

School District: Lucia Mar Unified School District.

Public Services

For additional information regarding fire hazard impacts, go to the 'Hazards and Hazardous Materials' section.

Impact. No significant project-specific impacts to utilities or public services were identified. This project, along with others in the area, will have a cumulative effect on police/sheriff and fire protection, and schools. The project's direct and cumulative impacts are within the general assumptions of allowed use for the subject property that was used to estimate the fees in place.

Mitigation/Conclusion. Regarding cumulative effects, public facility (County) and school (State Government Code 65995 et seq.) fee programs have been adopted to address this impact, and will reduce the cumulative impacts to less than significant levels.

11. RECREATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Increase the use or demand for parks or other recreation opportunities?	☐	☐	☐	☒
b) Affect the access to trails, parks or other recreation opportunities?	☐	☐	☐	☒
c) Other _____	☐	☐	☐	☒

Recreation

Setting. The County's Parks and Recreation Element does not show that a potential trail goes through the proposed project. The project is not proposed in a location that will affect any trail, park, recreational resource, coastal access, and/or Natural Area.

Impact. The proposed project will not create a significant need for additional park, Natural Area, and/or recreational resources.

Mitigation/Conclusion. No significant recreation impacts are anticipated, and no mitigation measures are necessary.

12. TRANSPORTATION/CIRCULATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Increase vehicle trips to local or areawide circulation system?	☐	☐	☒	☐
b) Reduce existing "Level of Service" on public roadway(s)?	☐	☐	☒	☐

12. TRANSPORTATION/CIRCULATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
c) Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?	☐	☐	☒	☐
d) Provide for adequate emergency access?	☐	☐	☒	☐
e) Conflict with an established measure of effectiveness for the performance of the circulation system considering all modes of transportation (e.g. LOS, mass transit, etc.)?	☐	☐	☐	☒
f) Conflict with an applicable congestion management program?	☐	☐	☐	☒
g) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
h) Result in a change in air traffic patterns that may result in substantial safety risks?	☐	☐	☐	☒
i) Other: _____	☐	☐	☐	☒

Transportation

Setting. The County has established the acceptable Level of Service (LOS) on roads for this rural area as "C" or better. The existing road network in the area, including the project's access street(s) Alisos Road is operating at an acceptable level of service. Based on existing road speeds and configuration (vertical and horizontal road curves), sight distance is considered acceptable.

Referrals were sent to County Public Works. No significant traffic-related concerns were identified.

Impact. After construction, the proposed unmanned wireless communications facility is estimated to generate about one vehicle trip every six to eight weeks for routine maintenance. This small amount of additional traffic will not result in a significant change to the existing road service or traffic safety levels.

Mitigation/Conclusion. No significant traffic impacts were identified, and no mitigation measures above what are already required by ordinance are necessary.

13. WASTEWATER *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Violate waste discharge requirements or Central Coast Basin Plan criteria for wastewater systems?	☐	☐	☐	☒

13. WASTEWATER

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
Will the project:				
b) Change the quality of surface or ground water (e.g., nitrogen-loading, day-lighting)?	☐	☐	☐	☒
c) Adversely affect community wastewater service provider?	☐	☐	☐	☒
d) Other: _____	☐	☐	☐	☒

Wastewater

Setting. The proposed project consists of an unmanned wireless communications facility and would not generate wastewater or require wastewater disposal.

Impact/Mitigation. Given that the proposed facility will not generate wastewater, impacts would be less than significant and no mitigation measures are necessary.

14. WATER & HYDROLOGY

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
Will the project:				
QUALITY				
a) Violate any water quality standards?	☐	☐	☒	☐
b) Discharge into surface waters or otherwise alter surface water quality (e.g., turbidity, sediment, temperature, dissolved oxygen, etc.)?	☐	☐	☒	☐
c) Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?	☐	☐	☒	☐
d) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff?	☐	☐	☒	☐
e) Change rates of soil absorption, or amount or direction of surface runoff?	☐	☐	☒	☐
f) Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?	☐	☐	☒	☐
g) Involve activities within the 100-year flood zone?	☐	☐	☒	☐
QUANTITY				
h) Change the quantity or movement of available surface or ground water?	☐	☐	☒	☐

14. WATER & HYDROLOGY

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
i) Adversely affect community water service provider?	☐	☐	☒	☐
j) Expose people to a risk of loss, injury or death involving flooding (e.g., dam failure,etc.), or inundation by seiche, tsunami or mudflow?	☐	☐	☒	☐
k) Other: _____	☐	☐	☐	☒

Water

Setting. The project does not have any water demand needs.

The topography of the project is gently rolling to moderately sloping. The closest creek from the proposed development is approximately . As described in the NRCS Soil Survey, the soil surface is considered to have low to moderate erodibility.

Projects involving more than one acre of disturbance are subject to preparing a Storm Water Pollution Prevention Plan (SWPPP) to minimize on-site sedimentation and erosion. When work is done in the rainy season, the County's Land Use Ordinance requires that temporary erosion and sedimentation measures to be installed.

DRAINAGE – The following relates to the project's drainage aspects:

Within the 100-year Flood Hazard designation? Yes

Closest creek? Unnamed tributaries to Tar Spring Creek Distance? On-site

Soil drainage characteristics: Moderately drained to very poorly drained

For areas where drainage is identified as a potential issue, the Land Use Ordinance (LUO Sec. 22.52.110) includes a provision to prepare a drainage plan to minimize potential drainage impacts. When required, this plan would need to address measures such as: constructing on-site retention or detention basins, or installing surface water flow dissipaters. This plan would also need to show that the increased surface runoff would have no more impacts than that caused by historic flows.

SEDIMENTATION AND EROSION – Soil type, area of disturbance, and slopes are key aspects to analyzing potential sedimentation and erosion issues. The project's soil types and descriptions are listed in the previous Agriculture section under "Setting". As described in the NRCS Soil Survey, the project's soil erodibility is as follows:

Soil erodibility: Low to moderate

A sedimentation and erosion control plan is required for all construction and grading projects (LUO Sec. 22.52.120) to minimize these impacts. When required, the plan is prepared by a civil engineer to address both temporary and long-term sedimentation and erosion impacts. Projects involving more than one acre of disturbance are subject to the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which focuses on controlling storm water runoff. The Regional Water Quality Control Board is the local extension who monitors this program.

Impact – Water Quality/Hydrology

With regards to project impacts on water quality the following conditions apply:

- ✓ Approximately 1.89 acres of site disturbance is proposed;
- ✓ The project will be subject to standard County requirements for drainage, sedimentation and erosion control for construction and permanent use;
- ✓ The project will be disturbing over an acre and will be required to prepare a SWPPP, which will be implemented during construction;
- ✓ The project is more than 100 feet from the closest creek or surface water body;
- ✓ All disturbed areas will be permanently stabilized with impermeable surfaces and landscaping;
- ✓ All hazardous materials and/or wastes will be properly stored on-site, which include secondary containment should spills or leaks occur.

Mitigation/Conclusion. As specified above for water quality, existing regulations and/or required plans will adequately address surface water quality impacts during construction and permanent use of the project. No additional measures above what are required or proposed are needed to protect water quality.

15. LAND USE

Will the project:

	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
a) Be potentially inconsistent with land use, policy/regulation (e.g., general plan [County Land Use Element and Ordinance], local coastal plan, specific plan, Clean Air Plan, etc.) adopted to avoid or mitigate for environmental effects?	☐	☐	☒	☐
b) Be potentially inconsistent with any habitat or community conservation plan?	☐	☐	☐	☒
c) Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?	☐	☐	☒	☐
d) Be potentially incompatible with surrounding land uses?	☐	☐	☒	☐
e) Other: _____	☐	☐	☐	☒

Land Use

Setting/Impact. Surrounding uses are identified on Page 2 of the Initial Study. The proposed project was reviewed for consistency with policy and/or regulatory documents relating to the environment and appropriate land use (e.g., County Land Use Ordinance, Local Coastal Plan, etc.). Referrals were sent to outside agencies to review for policy consistencies (e.g., CAL FIRE for Fire Code, APCD for Clean Air Plan, etc.). The project was found to be consistent with these documents (refer also to Exhibit A on reference documents used).

The project is not within or adjacent to a Habitat Conservation Plan area. The project is consistent or compatible with the surrounding uses as summarized on page 2 of this Initial Study.

The proposed project is subject to the following Planning Area Standard(s) as found in the County's LUO:

1. LUO Section 22.14.070 – Geologic Study Area (Discussed under the Geology section above)
2. LUO Section 22.98.030 – Huasna-Lopez Sub-area standards

Mitigation/Conclusion. No inconsistencies were identified and therefore no additional measures above what will already be required were determined necessary.

16. MANDATORY FINDINGS OF SIGNIFICANCE

Will the project:

	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or pre-history?	☐	☐	☒	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

For further information on CEQA or the County's environmental review process, please visit the County's web site at "www.sloplanning.org" under "Environmental Information", or the California Environmental Resources Evaluation System at: http://resources.ca.gov/ceqa/ for information about the California Environmental Quality Act.

Exhibit A - Initial Study References and Agency Contacts

The County Planning Department has contacted various agencies for their comments on the proposed project. With respect to the subject application, the following have been contacted (marked with an ☒) and when a response was made, it is either attached or in the application file:

Contacted	Agency	Response
☒	County Public Works Department	**Attached**
☒	County Environmental Health Services	**None**
☐	County Agricultural Commissioner's Office	**Not Applicable**
☐	County Airport Manager	**Not Applicable**
☐	Airport Land Use Commission	**Not Applicable**
☐	Air Pollution Control District	**Not Applicable**
☐	County Sheriff's Department	**Not Applicable**
☐	Regional Water Quality Control Board	**Not Applicable**
☐	CA Coastal Commission	**Not Applicable**
☐	CA Department of Fish and Wildlife	**Not Applicable**
☒	CA Department of Forestry (Cal Fire)	**Attached**
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☒	Other County Building Division	**None**
☐	Other	**Not Applicable**

*** "No comment" or "No concerns"-type responses are usually not attached*

The following checked ("☒") reference materials have been used in the environmental review for the proposed project and are hereby incorporated by reference into the Initial Study. The following information is available at the County Planning and Building Department.

☒ Project File for the Subject Application

County documents

- ☐ Coastal Plan Policies
- ☒ Framework for Planning (Coastal/Inland)
- ☒ General Plan (Inland/Coastal), includes all maps/elements; more pertinent elements:
  - ☒ Agriculture Element
  - ☒ Conservation & Open Space Element
  - ☐ Economic Element
  - ☒ Housing Element
  - ☒ Noise Element
  - ☒ Parks & Recreation Element/Project List
  - ☒ Safety Element
- ☒ Land Use Ordinance (Inland/Coastal)
- ☒ Building and Construction Ordinance
- ☒ Public Facilities Fee Ordinance
- ☐ Real Property Division Ordinance
- ☐ Affordable Housing Fund
- ☐ Airport Land Use Plan
- ☐ Energy Wise Plan
- ☒ South County Area Plan/Huasna-Lopez SA and Update EIR
- ☐ Design Plan
- ☐ Specific Plan
- ☒ Annual Resource Summary Report
- ☐ Circulation Study

Other documents

- ☒ Clean Air Plan/APCD Handbook
- ☒ Regional Transportation Plan
- ☒ Uniform Fire Code
- ☒ Water Quality Control Plan (Central Coast Basin – Region 3)
- ☒ Archaeological Resources Map
- ☒ Area of Critical Concerns Map
- ☒ Special Biological Importance Map
- ☒ CA Natural Species Diversity Database
- ☒ Fire Hazard Severity Map
- ☒ Flood Hazard Maps
- ☒ Natural Resources Conservation Service Soil Survey for SLO County
- ☒ GIS mapping layers (e.g., habitat, streams, contours, etc.)
- ☐ Other

In addition, the following project specific information and/or reference materials have been considered as a part of the Initial Study:

***AT&T Radio Frequency Safety Survey Report Prediction*, EBI Consulting, Inc., October 25, 2017**

***AT&T Mobility Photo Simulations,* Eukon Group**

***Biological Resources Impact Analysis,* Environmental Assessment Specialists, Inc., April 30, 2018**

***Findings of a Biological Evaluation*, Environmental Assessment Specialists, Inc., November 16, 2017**

Exhibit B - Mitigation Summary Table

Per Public Resources Code Section 21081.6, the following measures also constitute the mitigation monitoring and/or reporting program that will reduce potentially significant impacts to less than significant levels. These measures will become conditions of approval (COAs) should the project be approved. The Lead Agency (County) or other Responsible Agencies, as specified in the following measures, are responsible to verify compliance with these COAs.

Aesthetics

VR-1. **At the time of application for construction permits**, the construction drawings shall reflect the following specifications:

a. The monoeucalyptus shall be designed to match the colors and textures of the bark and leaves of the adjacent eucalyptus trees. Realistic bark texture shall run the entire length of the monoeucalyptus.

b. Plans, specifications and estimates shall require the submittal of material and color test samples of all visible elements of the monoeucalyptus to the County Department of Planning and Building for review and approval. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the test samples prior to preparation of the final plans.

c. The monoeucalyptus shall be designed and constructed to appear as an organic, non-symmetrical form, with varying branch lengths and shapes.

d. The coaxial cables and cable tray shall be located below the fence line and shall not be visible to the public.

VR-2. **At the time of application for construction permits**, the applicant shall submit accurate, scaled engineering and architectural drawings of the monoeucalyptus tree exactly as proposed. Plans shall not include generic illustrations of a monoeucalyptus tree. The drawings shall include elevations and plan views. Once approved, monoeucalyptus tree plans shall be specifically used (in conjunction with approved color and material samples and other related documents) as a basis for assessing condition compliance during construction. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the monoeucalyptus tree engineering and architectural plans prior to preparation of the final plans.

VR-3. **At the time of application for construction permits**, the applicant shall submit material and color test samples of all visible elements of the monoeucalyptus to the County Department of Planning and Building for review and approval. This submittal shall include both photographs of actual existing monoeucalyptus trees constructed by the selected vendor, as well as physical samples of the faux foliage and branch materials to be used. The monoeucalyptus shall be constructed of the highest quality, most durable and realistic appearing faux foliage and branches. The color of the faux foliage shall be field matched with the existing adjacent conifer trees.

Air Quality

AQ-1. **Prior to issuance of construction permits,** the applicant shall have a geologic evaluation completed to determine if naturally occurring asbestos (NOA) is present within the area of disturbance. If NOA is not present, an exemption request shall be filed with the APCD. If NOA is present, the applicant shall comply with all requirements of the Air Toxics Control Measure.

AQ-2. Developmental burning of vegetative material within San Luis Obispo County is prohibited. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: APCD approval; payment of fee to APCD based on

the size of the project; and issuance of a burn permit by the APCD and the local fire department authority. As a part of APCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) **at the time of application**.

Biological Resources

BR-1. **At the time of application for construction and/or grading permits**, the applicant shall clearly show all oak trees within 50 feet of grading and /or construction activities on the grading and/or construction plans. In addition to showing the limits of grading, the grading plans shall also designate which oak trees are to be removed and which oak trees will be impacted by grading activities occurring within the root zone (one and one half times the dripline). Oak trees within 50 feet of grading activities, which are not designated for removal, shall be fenced and flagged for protection prior to permit issuance. Fencing shall be clearly shown on the grading plans to be located at the root zone for trees not designated for removal. For impacted trees, where grading activities will occur within the root zone, fencing may be placed at the limits of grading activities. Any tree removal associated with CalFire/County Fire vegetative clearance/modification requirements shall also be considered on the plans.

BR-2. **At the time of application for construction and/or grading permits,** the applicant shall submit an oak tree replacement plan to be reviewed and approved by the Environmental Coordinator for any oak trees identified to be removed and/or impacted. The plan shall provide for the replacement, in kind at a 4:1 ratio to mitigate for trees removed and at a 2:1 ratio to mitigate for trees impacted but not removed.

BR-3. **Prior to final inspection or occupancy,** the applicant shall replace, in kind at a 4:1 ratio, all oak trees removed as a result of the development of the project, and in addition, shall plant at a 2:1 ratio for each tree impacted but not removed. Replanting shall be completed as soon as it is feasible (e.g. irrigation water is available, grading done in replant area). Replant areas shall be either in native topsoil or areas where native topsoil has been reapplied. If the latter, top soil shall be carefully removed and stockpiled for spreading over graded areas to be replanted (set aside enough for 6-12" layer).

Location of newly planted trees should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines).

These newly planted trees shall be maintained until successfully established. This shall include protection (e.g. tree shelters, caging) from animals (e.g., deer, rodents), regular weeding (minimum of once early Fall and once early Spring) of at least a three-foot radius out from plant and adequate watering (e.g., drip-irrigation system). Watering should be controlled so only enough is used to initially establish the tree, and reducing to zero over a three year period. If possible, planting during the warmest, driest months (June through September) shall be avoided. In addition, standard planting procedures (e.g., planting tablets, initial deep watering) shall be used. Replacement oak trees shall be from vertical tubes or deep, one-gallon container sizes.

BR-4. **Unless previously approved by the County,** the following activities are not allowed within the root zone of existing or newly planted oak trees: year-round irrigation (no summer watering, unless “establishing” new tree or native compatible plant(s) for up to 3 years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling).

The applicant recognizes that trimming of oaks can be detrimental in the following respects and agrees to minimize trimming of the remaining oaks: removal of larger lower branches should be minimized to 1) avoid making tree top heavy and more susceptible to "blow-overs", 2) reduce having larger limb cuts that take longer to heal and are much more susceptible to disease and infestation, 3) retain the wildlife that is found only in the lower branches, 4) retains shade to keep summer temperatures cooler (retains higher soil moisture, greater passive solar potential, provides better conditions for oak seedling volunteers) and 5) retain the natural shape of the tree. Limit the amount of trimming (roots or canopy) done in anyone season as much as possible to limit tree stress/shock (10% or less is best, 25% maximum). Excessive and careless trimming not only reduces the potential life of the tree, but can also reduce property values if the tree dies prematurely or has an unnatural appearance. If trimming is necessary, the applicant agrees to either use a skilled arborist or apply accepted arborist's techniques when removing limbs. Unless a hazardous or unsafe situation exists, trimming shall be done only during the winter for deciduous species.

Smaller trees (smaller than 5 inches in diameter at four feet above the ground) within the project area are considered to be of high importance, and when possible, shall be given similar consideration as larger trees.

BR-5. Once trees have been planted and **prior to final inspection/occupancy**, the applicant shall retain a qualified individual (e.g., landscape contractor, arborist, nurseryman, botanist) to prepare a letter stating when the above planting occurred, what was planted and all measures installed to improve the long-term success of these trees. This letter shall be submitted to the Environmental Coordinator.

BR-6. **Prior to issuance of construction permits**, the applicant shall submit a focused botanical survey conducted between March-June to determine the presence/absence of the following special status species on the project site: Santa Margarita manzanita (*Arctostaphylos pilosula*), Slender bush-mallow (*Malacothamnus gracilis*), and Pismo clarkia (*Clarkia speciosa ssp. immaculata*). If the results of the survey determine that there are no special status plants on the project site, no further mitigation measures are required.

If any special status plants are present on the project site, the County, in consultation with the applicant and applicant's biologist, shall determine if removal of these plants can be avoided.

If avoidance is not feasible, the applicant shall submit a restoration plan, prepared by a qualified biologist, to be reviewed and approved by the County Planning and Building Department, **prior to issuance of construction permits**. This plan shall include, at a minimum, the following:

- Identification of the type and number of plants to be removed.
- Identification of locations, amounts, size and types of plants to be replanted, as well as any other necessary components (e.g., temporary irrigation, amendments, etc.) to ensure successful reestablishment.
- Provide for a native seed collection effort prior to any ground disturbing activities. Collection of native seed shall be propagated by a County approved biologist. Plant shall include, but not be limited to California Native Plant Society (CNPS) listed plant species that may be affected.
- Quantification of the impact based on construction drawings and quantification of mitigation areas such that the replacement criteria are met (2:1 acreage ratio or 3:1 for individual plants).
- A program schedule and success criteria for a minimum five-year monitoring and reporting program that is structured to ensure the success of the restoration plan.

- Identification of access and methods of materials transport to the restoration area, including personnel, vehicles, tools, plants, irrigation equipment, water and all other similar supplies. Access shall not result in new or additional impacts to habitat and special status species.
- The restoration plan shall incorporate an invasive species control program.

BR-7. **Prior to issuance of construction permits**, if removal of special status plants is necessary, the applicant shall submit a cost estimate for the restoration plan described above under BR-6. Prior to issuance of construction permits, a performance bond, equal to the cost estimate, shall be posted by the applicant.

BR-8. The applicant shall avoid removal of vegetation or any other ground disturbance between February and September 15 to avoid impacts to native breeding and nesting birds. If construction activities during this period cannot be avoided, a county-approved biologist shall survey all breeding and nesting habitat on the site and adjacent sites for breeding and/or nesting birds no more than two weeks prior to construction or site disturbance activities. Results of the surveys shall be submitted to the Department of Fish and Wildlife (CDFW) for concurrence with the report. If nesting and/or breeding birds are found, appropriate mitigation measures shall be developed in consultation with the CDFW and the applicant shall adhere to these measures during all construction activities on the site.

Geology and Soils

GS-1. Fault Setbacks. The Earthquake Fault Zone shall be shown on all applicable construction plans. All structures to be located within the Earthquake Fault Zone shall comply with the fault investigation requirements and setbacks as set forth in the Alquist-Priolo Earthquake Fault Zoning Act.

GS-2. Soils/Foundation Preparation. In order to avoid soil-related hazards to structures and roadways that are built as part of this development, an engineering soils report is required that evaluates the expansion and erosion potentials of the existing soils. The report shall be prepared for all structures. The applicant shall incorporate the report's recommendations. One or more of the following would be expected during construction of any future structure or roadway:

a. Use continuous deep footings (i.e., embedment depth of 3 feet or more) and concrete slabs on grade with increased steel reinforcement together with a pre-wetting and long-term moisture control program within the active zone.

b. Removal of the highly expansive material and replacement with non-expansive import fill material.

c. The use of specifically designed drilled pier and grade beam system incorporating a structural concrete slab on grade supported approximately 6 inches above the expansive soils.

d. Chemical treatment with hydrated lime to reduce the expansion characteristics of the soils.

Date: November 16, 2018

DEVELOPER'S STATEMENT FOR
AT&T Mobility/Machado Conditional Use Permit
DRC2017-00032 / ED17-071

The applicant agrees to incorporate the following measures into the project. These measures become a part of the project description and therefore become a part of the record of action upon which the environmental determination is based. All development activity must occur in strict compliance with the following mitigation measures. These measures shall be perpetual and run with the land. These measures are binding on all successors in interest of the subject property.

Note: The items contained in the boxes labeled "Monitoring" describe the County procedures to be used to ensure compliance with the mitigation measures.

The following mitigation measures address impacts that may occur as a result of the development of the project.

Aesthetics / Visual Resources

VR-1. **At the time of application for construction permits,** the construction drawings shall reflect the following specifications:

a. The mono-eucalyptus shall be designed and constructed to appear as an organic, non-symmetrical form, with varying branch lengths and shapes and clusters installed in random, seemingly natural-occurring patterns. Realistic bark texture shall run the entire length of the tree pole.
b. The mono-eucalyptus "leaves" shall not be all one color. Varying shades of hues shall be used appropriately to replicate a living plant. Mono-eucalyptus colors shall be field matched with the existing on-site mature eucalyptus trees.
c. Plans, specifications and estimates shall require the submittal of material and color test samples of all visible elements of the mono-eucalyptus to the County Department of Planning and Building for review and approval. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the test samples prior to preparation of the final plans.
d. The coaxial cables and cable tray shall be located below the fence line and shall not be visible to the public.

VR-2. **At the time of application for construction permits,** the applicant shall submit accurate, scaled engineering and architectural drawings of the mono-eucalyptus exactly as proposed. Plans shall not include generic illustrations of a mono-eucalyptus. The drawings shall include elevations and plan views. Once approved, mono-eucalyptus plans shall be specifically used (in conjunction with approved color and material samples and other related documents) as a basis for assessing condition compliance during construction. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the mono-eucalyptus engineering and architectural plans prior to preparation of the final plans.

VR-3. **Prior to issuance of a construction permit**, the applicant shall submit material and color test samples of all visible elements of the mono-eucalyptus to the County

Department of Planning and Building for review and approval. This submittal shall include both photographs of actual existing mono-eucalyptus trees constructed by the selected vendor, as well as physical samples of the faux foliage and branch materials to be used. The faux eucalyptus shall be constructed of the highest quality, most durable and realistic appearing faux foliage and branches. The color of the faux foliage shall be field matched with the existing eucalyptus trees on site.

Monitoring AE-1 through AE-3: Compliance will be verified by the Department of Planning and Building in consultation with the Environmental Coordinator prior to issuance of grading/ construction permits. Permits will not be issued until these measures have been satisfied.

Air Quality

AQ-1. **Prior to issuance of construction permits**, the applicant shall have a geologic evaluation completed to determine if naturally occurring asbestos (NOA) is present within the area of disturbance. If NOA is not present, an exemption request shall be filed with the APCD. If NOA is present, the applicant shall comply with all requirements of the Air Toxics Control Measure.

AQ-2. Developmental burning of vegetative material within San Luis Obispo County is prohibited. However, under certain circumstances where no technically feasible alternatives are available, limited developmental burning under restrictions may be allowed. Any such exception must complete the following prior to any burning: APCD approval; payment of fee to APCD based on the size of the project; and issuance of a burn permit by the APCD and the local fire department authority. As a part of APCD approval, the applicant shall furnish them with the study of technical feasibility (which includes costs and other constraints) **at the time of application**.

Monitoring AQ-1 through AQ-2: Compliance will be verified by the Department of Planning and Building in consultation with the Air Pollution Control District prior to issuance of grading/ construction permits. Permits will not be issued until these measures have been satisfied.

Biological Resources

BR-1. **At the time of application for construction and/or grading permits**, the applicant shall clearly show all oak trees within 50 feet of grading and /or construction activities on the grading and/or construction plans. In addition to showing the limits of grading, the grading plans shall also designate which oak trees are to be removed and which oak trees will be impacted by grading activities occurring within the root zone (one and one half times the dripline). Oak trees within 50 feet of grading activities, which are not designated for removal, shall be fenced and flagged for protection prior to permit issuance. Fencing shall be clearly shown on the grading plans to be located at the root zone for trees not designated for removal. For impacted trees, where grading activities will occur within the root zone, fencing may be placed at the limits of grading activities. Any tree removal associated with CalFire/County Fire vegetative clearance/modification requirements shall also be considered on the plans.

BR-2. **At the time of application for construction and/or grading permits**, the

applicant shall submit an oak tree replacement plan to be reviewed and approved by the Environmental Coordinator for any oak trees identified to be removed and/or impacted. The plan shall provide for the replacement, in kind at a 4:1 ratio to mitigate for trees removed and at a 2:1 ratio to mitigate for trees impacted but not removed.

BR-3. **Prior to final inspection or occupancy**, the applicant shall replace, in kind at a 4:1 ratio, all oak trees removed as a result of the development of the project, and in addition, shall plant at a 2:1 ratio for each tree impacted but not removed. Replanting shall be completed as soon as it is feasible (e.g. irrigation water is available, grading done in replant area). Replant areas shall be either in native topsoil or areas where native topsoil has been reapplied. If the latter, top soil shall be carefully removed and stockpiled for spreading over graded areas to be replanted (set aside enough for 6-12" layer).

Location of newly planted trees should adhere to the following, whenever possible: on the north side of and at the canopy/dripline edge of existing mature native trees; on north-facing slopes; within drainage swales (except when riparian habitat present); where topsoil is present; and away from continuously wet areas (e.g. lawns, leach lines).

These newly planted trees shall be maintained until successfully established. This shall include protection (e.g. tree shelters, caging) from animals (e.g., deer, rodents), regular weeding (minimum of once early Fall and once early Spring) of at least a three-foot radius out from plant and adequate watering (e.g., drip-irrigation system). Watering should be controlled so only enough is used to initially establish the tree, and reducing to zero over a three year period. If possible, planting during the warmest, driest months (June through September) shall be avoided. In addition, standard planting procedures (e.g., planting tablets, initial deep watering) shall be used. Replacement oak trees shall be from vertical tubes or deep, one-gallon container sizes.

BR-4. Unless previously approved by the County, the following activities are not allowed within the root zone of existing or newly planted oak trees: year-round irrigation (no summer watering, unless "establishing" new tree or native compatible plant(s) for up to 3 years); grading (includes cutting and filling of material); compaction (e.g., regular use of vehicles); placement of impermeable surfaces (e.g., pavement); disturbance of soil that impacts roots (e.g., tilling).

The applicant recognizes that trimming of oaks can be detrimental in the following respects and agrees to minimize trimming of the remaining oaks: removal of larger lower branches should be minimized to 1) avoid making tree top heavy and more susceptible to "blow-overs", 2) reduce having larger limb cuts that take longer to heal and are much more susceptible to disease and infestation, 3) retain the wildlife that is found only in the lower branches, 4) retains shade to keep summer temperatures cooler (retains higher soil moisture, greater passive solar potential, provides better conditions for oak seedling volunteers) and 5) retain the natural shape of the tree. Limit the amount of trimming (roots or canopy) done in anyone season as much as possible to limit tree stress/shock (10% or less is best, 25% maximum). Excessive and careless trimming not only reduces the potential life of the tree, but can also reduce property values if the tree dies prematurely or has an unnatural appearance. If trimming is necessary, the applicant agrees to either use a skilled arborist or apply accepted arborist's techniques when removing limbs. Unless a hazardous or unsafe situation exists, trimming shall be done only during the winter for deciduous species.

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the project area are considered to be of high importance, and when possible, shall be given similar consideration as larger trees.

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Monitoring BR-1 through BR-8: Compliance will be verified by the Department of Planning and Building in consultation with the Environmental Coordinator prior to issuance and/or final of grading/ construction permits.

Geology and Soils

GS-1. Fault Setbacks. The Earthquake Fault Zone shall be shown on all applicable construction plans. All structures to be located within the Earthquake Fault Zone shall comply with the fault investigation requirements and setbacks as set forth in the Alquist-Priolo Earthquake Fault Zoning Act.

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b. Removal of the highly expansive material and replacement with non-expansive import fill material.

c. The use of specifically designed drilled pier and grade beam system incorporating a structural concrete slab on grade supported approximately 6 inches above the expansive soils.

d. Chemical treatment with hydrated lime to reduce the expansion characteristics of the soils.

Monitoring GS-1 through GS-2: Compliance will be verified by the Department of Planning and Building in consultation with the Environmental Coordinator and/or County Geologist, as necessary, prior to issuance of grading/ construction permits.

The applicant understands that any changes made to the project description subsequent to this environmental determination must be reviewed by the Environmental Coordinator and may require a new environmental determination for the project. By signing this agreement, the owner(s) agrees to and accepts the incorporation of the above measures into the proposed

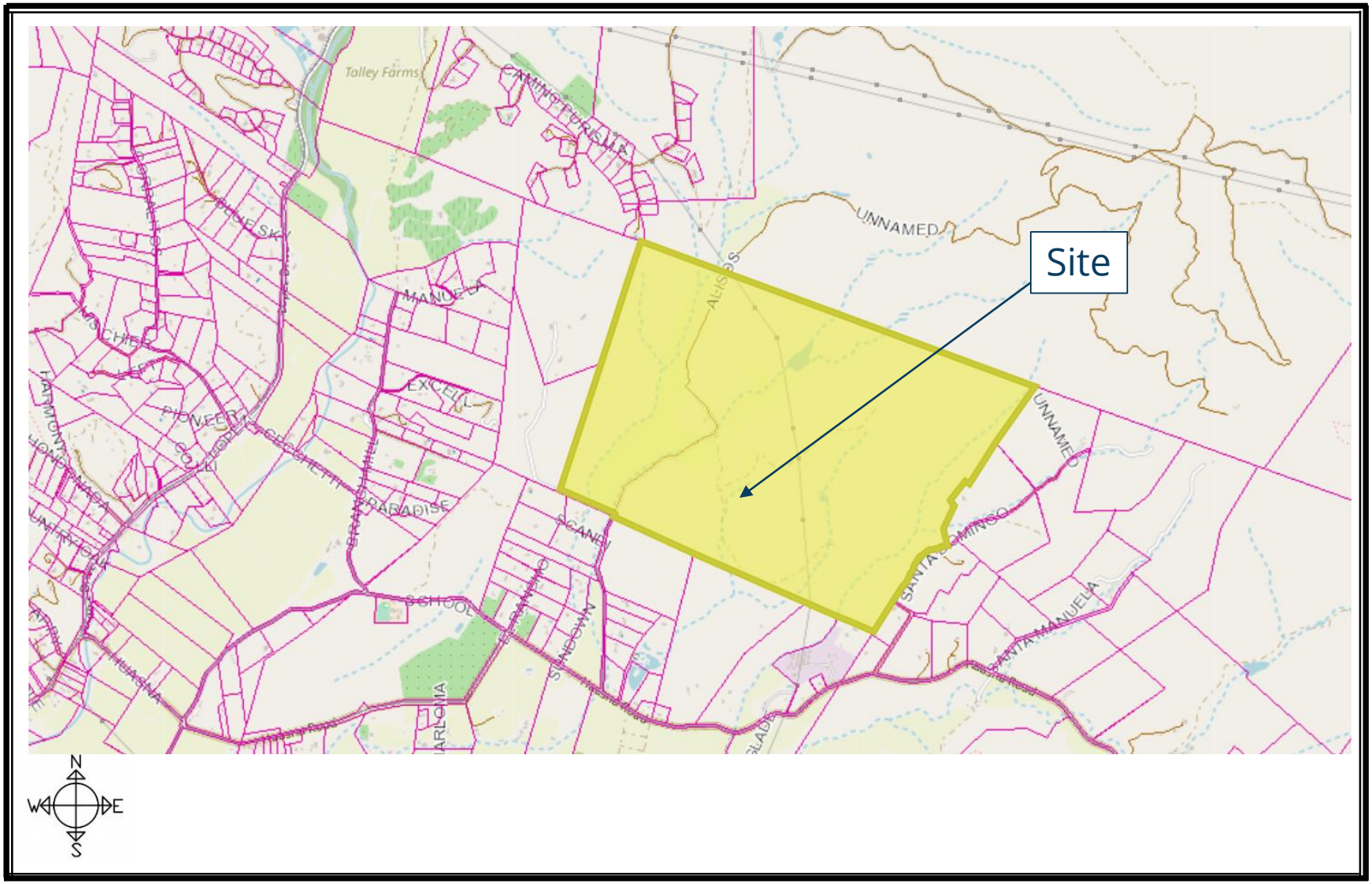
project description.

11/20/2018

Signature of Owner(s) Date

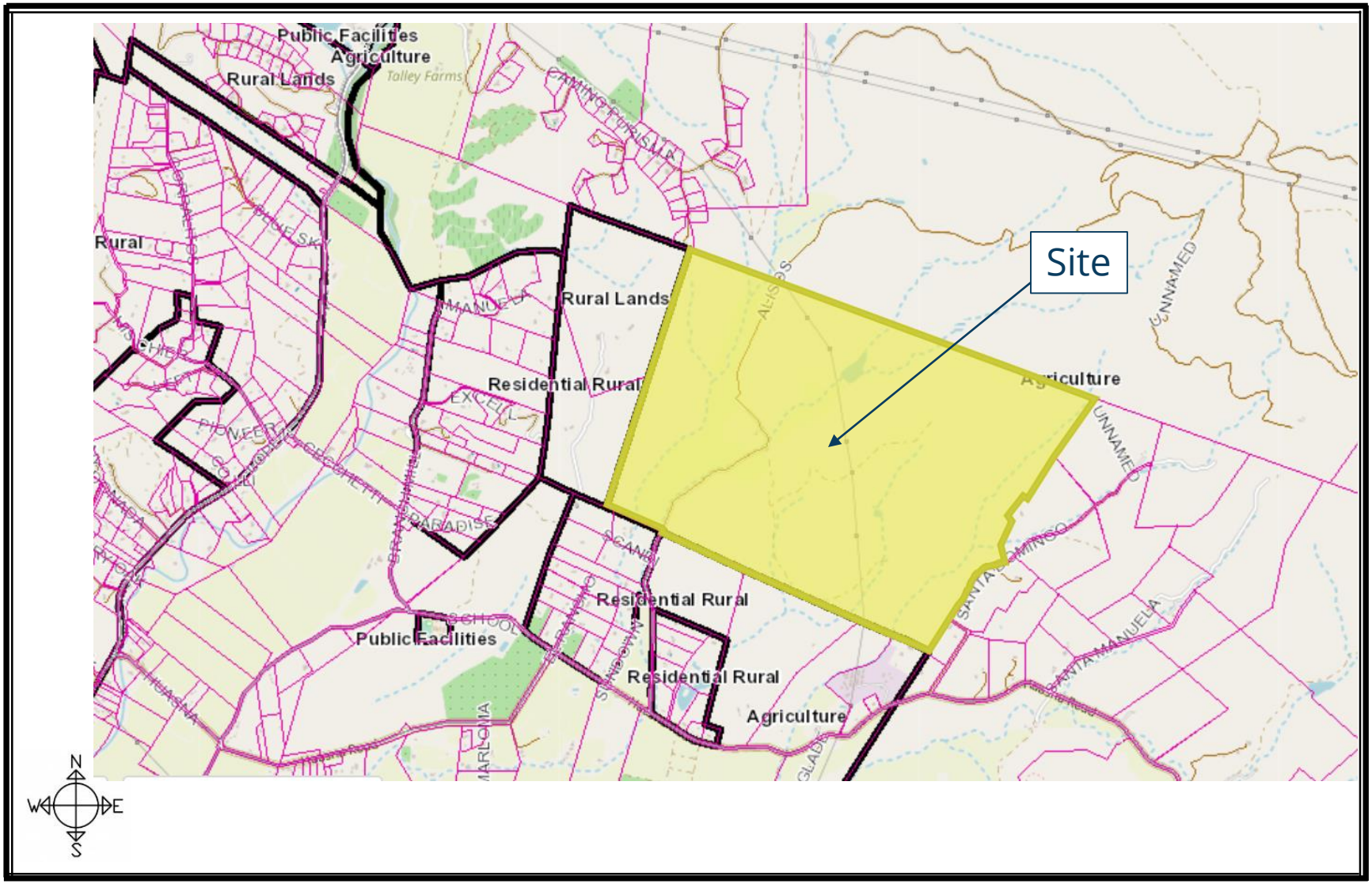
BRIAN MALOOF

Name (Print)



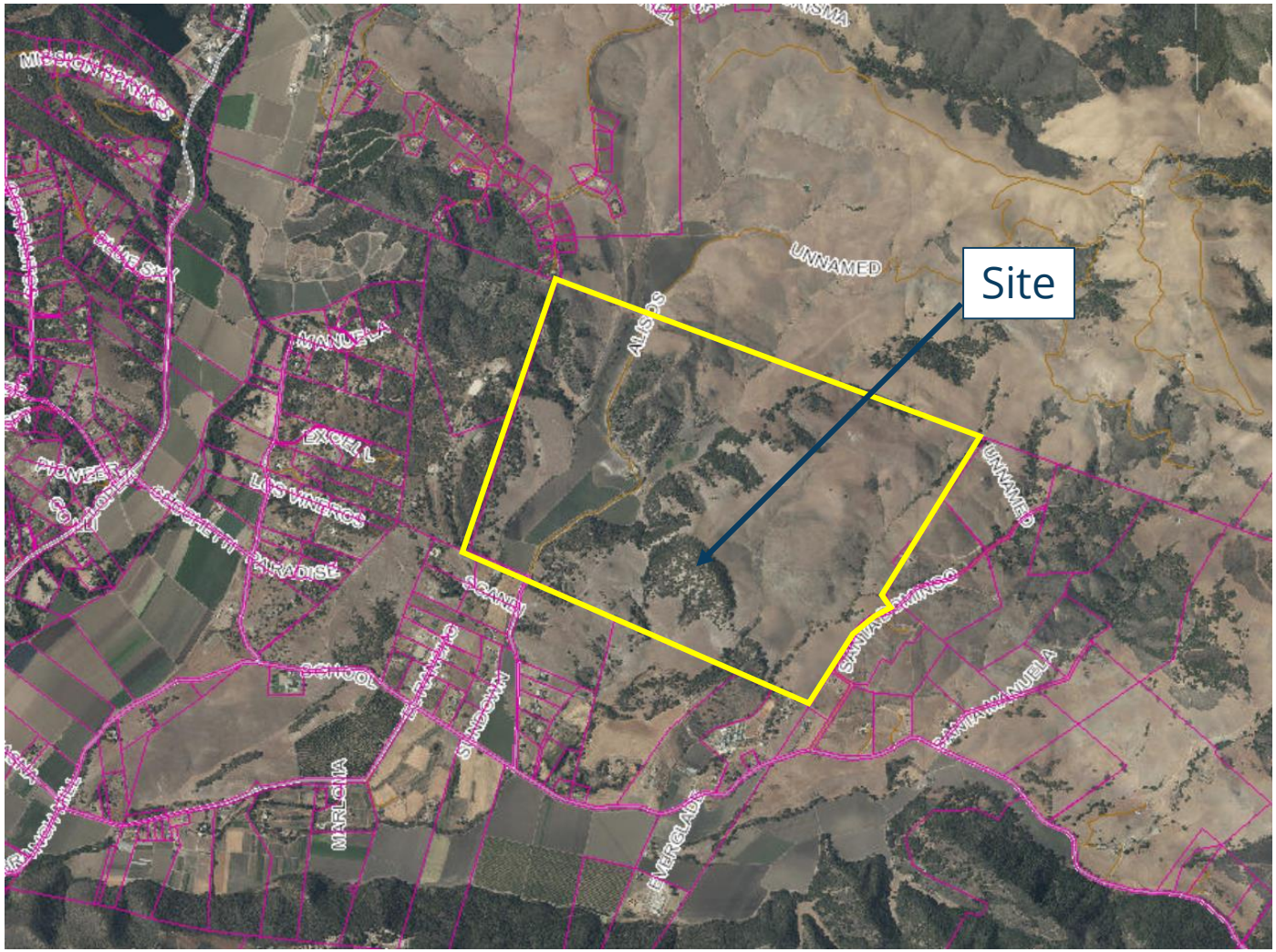
COUNTY OF SAN LUIS OBISPO

Vicinity Map
DRC2017-00032



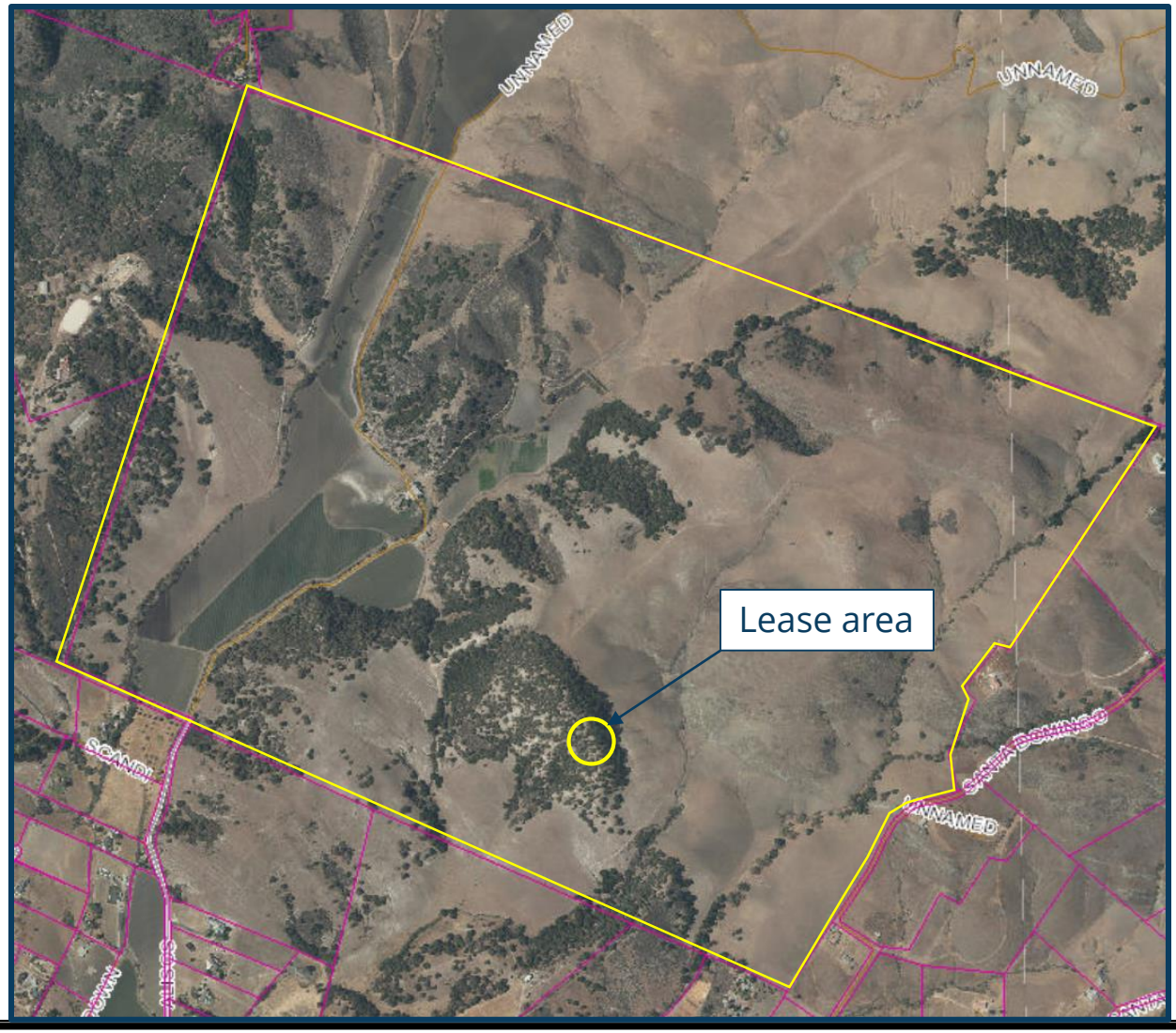
COUNTY OF SAN LUIS OBISPO

Land Use Category Map
DRC2017-00032



COUNTY OF SAN LUIS OBISPO

Aerial
DRC2017-00032



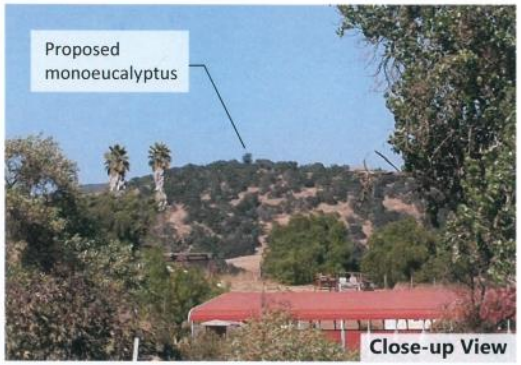
COUNTY OF SAN LUIS OBISPO

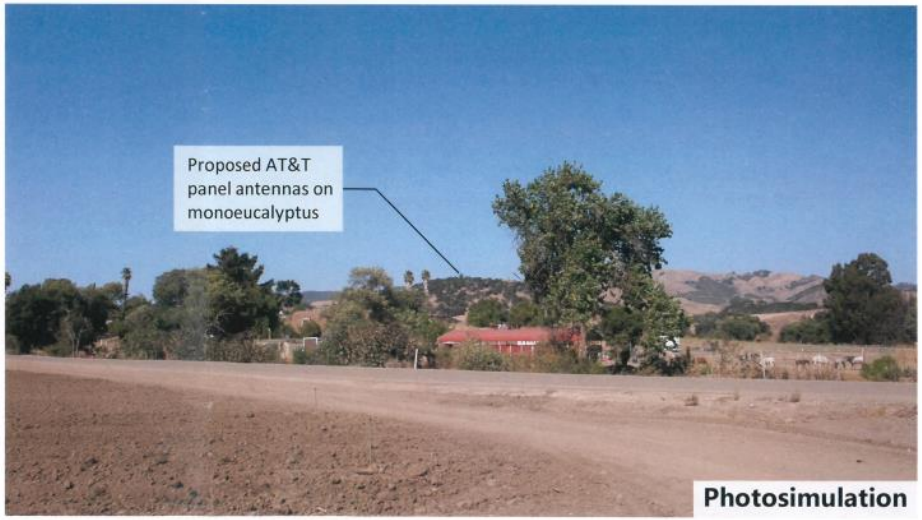
Aerial
DRC2017-00032

View 1

Looking northeast from Huasna Rd. and Alisos Rd. toward subject site.

AT&T





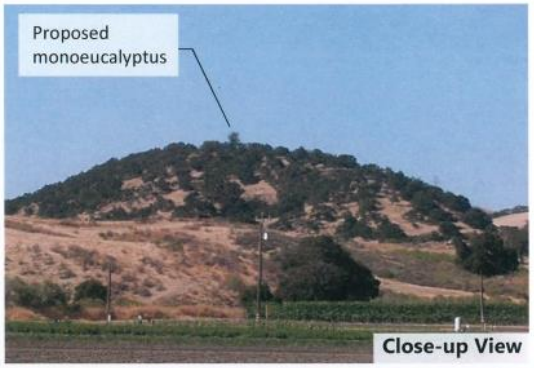
COUNTY OF SAN LUIS OBISPO

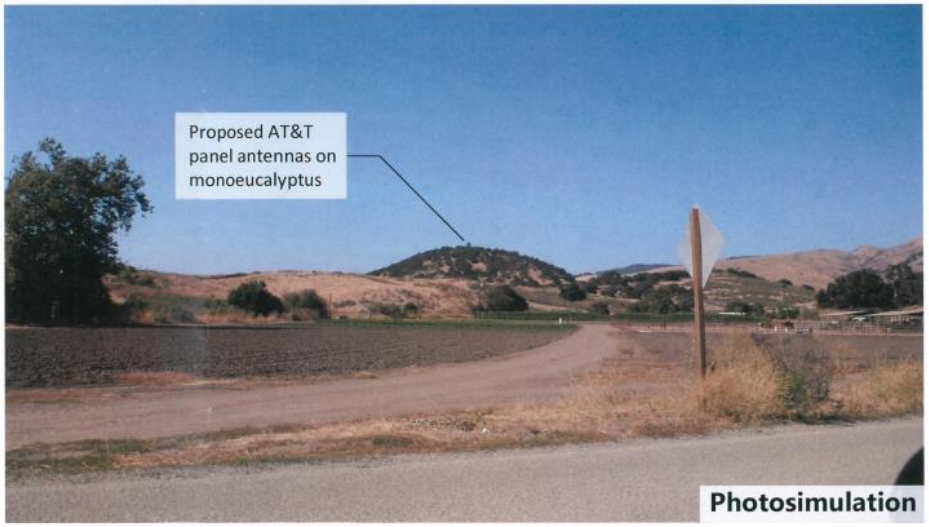
Photo Simulations
DRC2017-00032

View 2

Looking north from Huasna Rd. and Everglade Rd. toward subject site.

AT&T





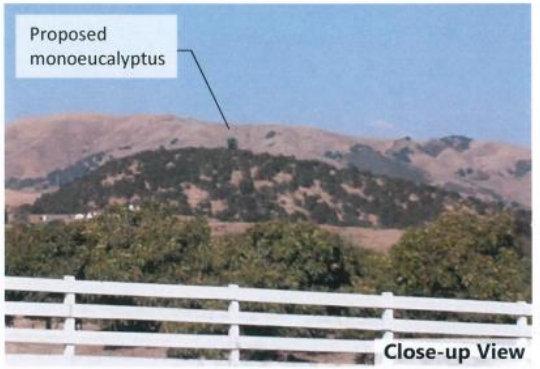
COUNTY OF SAN LUIS OBISPO

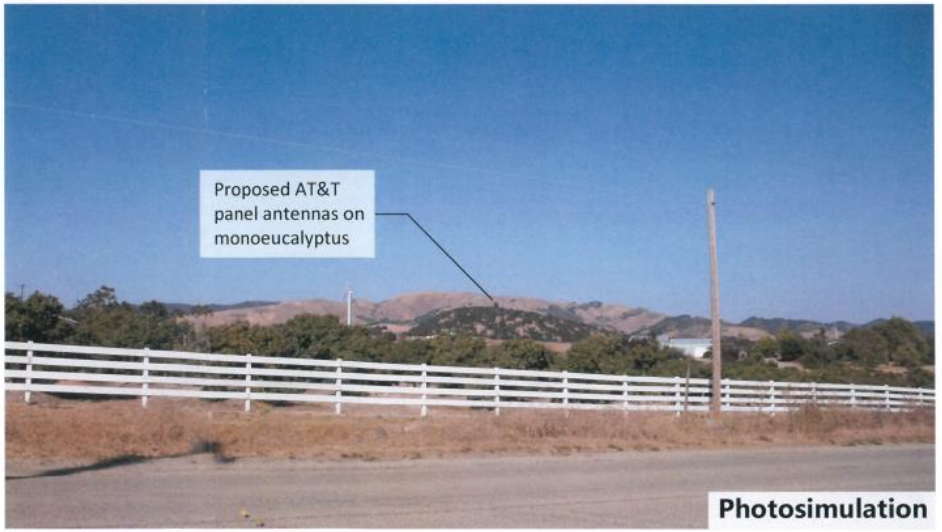
Photo Simulations
DRC2017-00032

View 3

Looking northeast from Huasna Rd. toward subject site.

AT&T



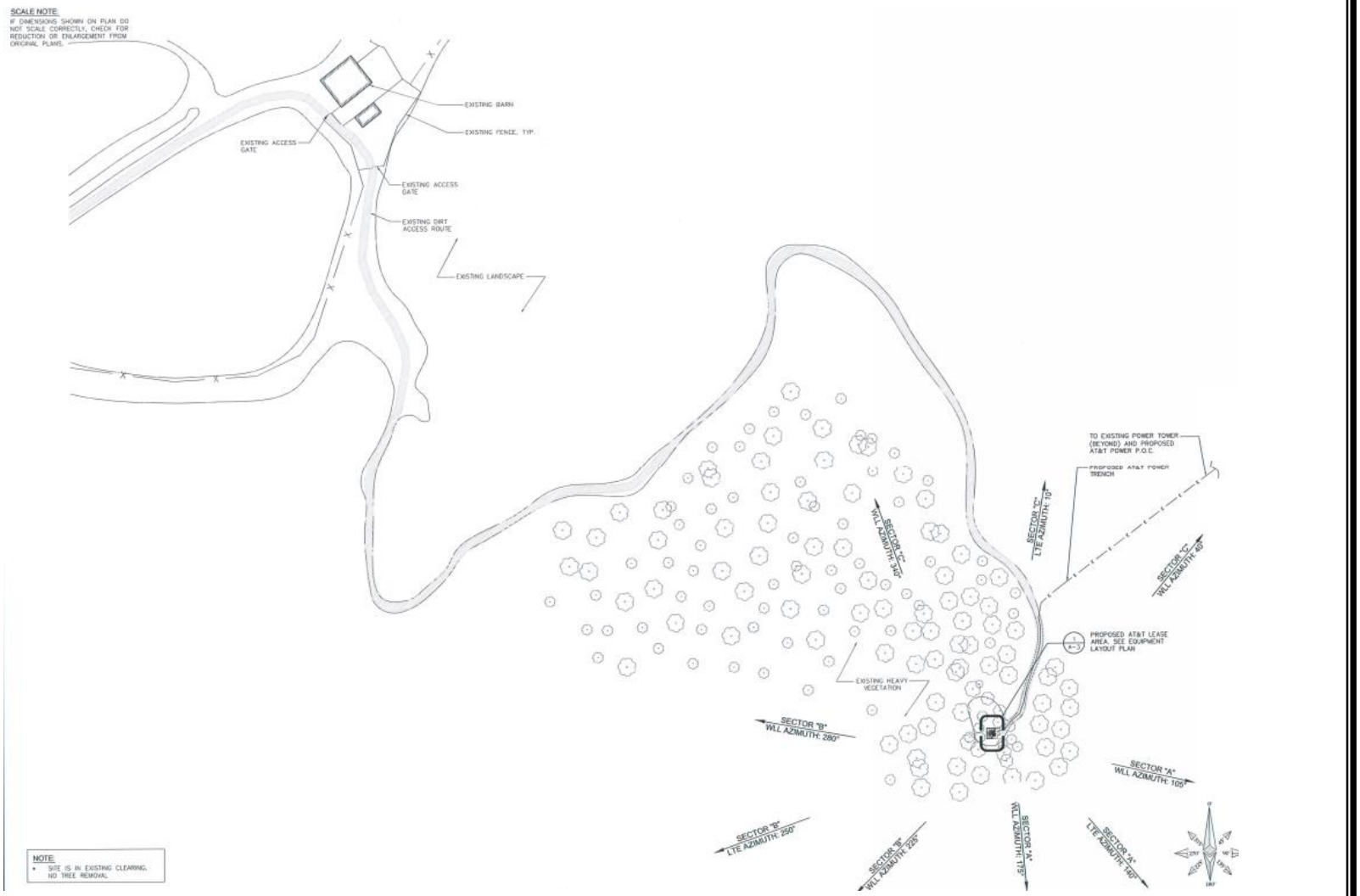


COUNTY OF SAN LUIS OBISPO

Photo Simulations
DRC2017-00032

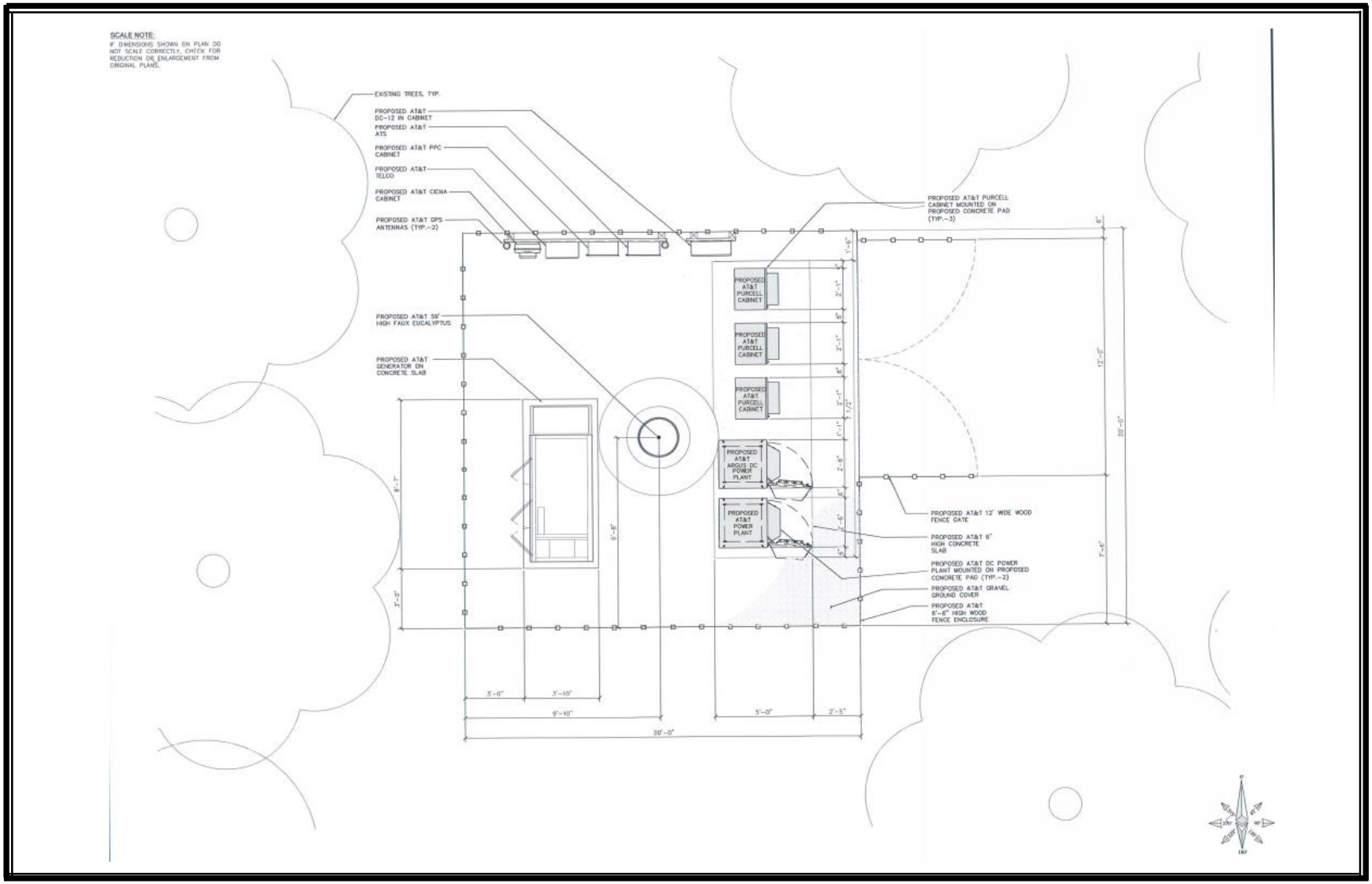
COUNTY OF SAN LUIS OBISPO

Overall Site Plan
DRC2017-00032



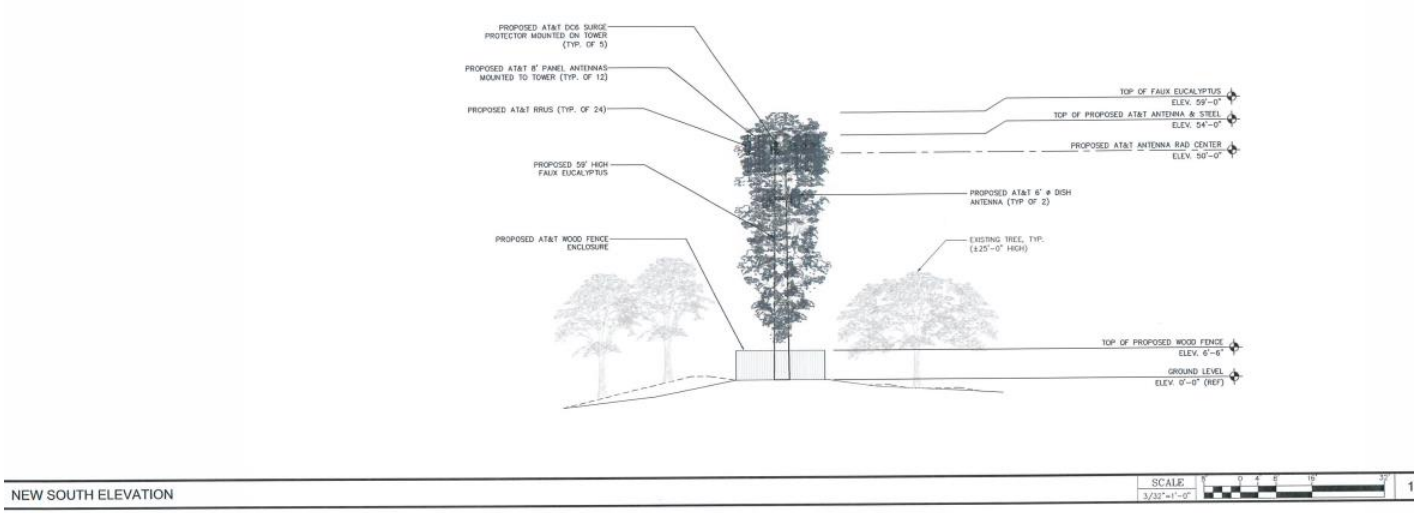
COUNTY OF SAN LUIS OBISPO

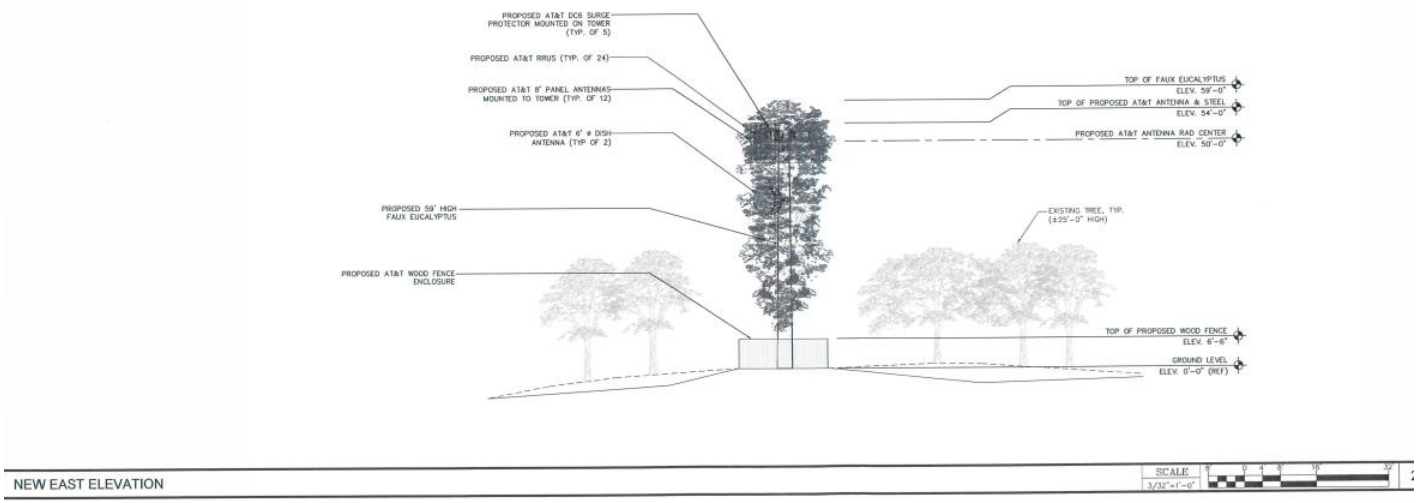
Enlarged Site Plan
DRC2017-00032



COUNTY OF SAN LUIS OBISPO

Equipment Layout
DRC2017-00032


PROPOSED AT&T DC6 SURGE PROTECTOR MOUNTED ON TOWER (TYP. OF 5)
PROPOSED AT&T 8' PANEL ANTENNAS MOUNTED TO TOWER (TYP. OF 12)
PROPOSED AT&T RRUS (TYP. OF 24)
PROPOSED 59' HIGH FAUX EUCALYPTUS
PROPOSED AT&T WOOD FENCE ENCLOSURE
TOP OF FAUX EUCALYPTUS ELEV. 59'-0"
TOP OF PROPOSED AT&T ANTENNA & STEEL ELEV. 54'-0"
PROPOSED AT&T ANTENNA RAD CENTER ELEV. 50'-0"
PROPOSED AT&T 6' ø DISH ANTENNA (TYP OF 2)
EXISTING TREE, TYP. (±25'-0" HIGH)
TOP OF PROPOSED WOOD FENCE ELEV. 6'-6"
GROUND LEVEL ELEV. 0'-0" (REF)
NEW SOUTH ELEVATION
SCALE 3/32"=1'-0"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