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. ED Number 18-031 **DATE:** February 14, 2019

PROJECT/ENTITLEMENT: AT&T Mobility Conditional Use Permit / DRC2018-00129

APPLICANT NAME: AT&T Mobility **Email:** vpomeroy@velotera.com
ADDRESS: 1452 Edinger Avenue, 3rd Floor, Tustin, CA 92780
CONTACT PERSON: Vance Pomeroy **Telephone:** (661) 361-5619

PROPOSED USES/INTENT: A request by AT&T Mobility for a Conditional Use Permit (DRC2018-00129) to allow for the construction and operation of a new communications facility (cell site) consisting of six (6) 12-foot tall antenna support poles, eight (8) panel antennas, twenty-four (24) remote radio units, four (4) surge suppression units, and two (2) microwave dishes, all located within an approximate 30-foot by 30-foot lease area. The project also involves a new 308-square-foot equipment enclosure with a diesel standby emergency generator and associated equipment, located approximately 400 feet southwest of the proposed antenna support lease area. The equipment enclosure is surrounded by 8-foot tall concrete masonry unit walls, located within an approximate 23-foot by 15-foot lease area. The project will result in the disturbance of approximately 1,980 square feet (including utility trenching and walkway) on an approximate 12-acre parcel. The proposed project is within the Residential Rural land use category.

LOCATION: The project is located at 14670 Morro Road (Highway 41), approximately 0.7 miles west of the city limits of Atascadero, in the County of San Luis Obispo.

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. (2 wks from above DATE)

20-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	Name	Date	Public Agency
	Cody Scheel (cscheel@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 Mobility Conditional Use Permit ED18-031 (DRC2018-00129)

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.

Cody Scheel (cscheel@co.slo.ca.us)	Cody Scheel		2/7/19
Prepared by (Print)	Signature		Date
TERRY WAHLER	Terry Wahler	Ellen Carroll, Environmental Coordinator (for)	2/7/19
Reviewed by (Print)	Signature		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: A request by AT&T Mobility for a Conditional Use Permit (DRC2018-00129) to allow for the construction and operation of a new communications facility (cell site) consisting of six (6) 12-foot tall antenna support poles, eight (8) panel antennas, twenty-four (24) remote radio units, four (4) surge suppression units, and two (2) microwave dishes, all located within an approximate 30-foot by 30-foot lease area. The project also involves a new 308-square-foot equipment enclosure with a diesel standby emergency generator and associated equipment, located approximately 400 feet southwest of the proposed antenna support lease area. The equipment enclosure is surrounded by 8-foot tall concrete masonry unit walls, located within an approximate 23-foot by 15-foot lease area. The project will result in the disturbance of approximately 1,980 square feet (including utility trenching and walkway) on an approximate 12-acre parcel. The proposed project is within the Residential Rural land use category and is located at 14670 Morro Road (Highway 41), approximately 0.7 miles west of the city limits of Atascadero. The site is in the Salinas River Sub Area of the North County Planning area.

ASSESSOR PARCEL NUMBER(S): 051-181-010

Latitude: 35 degrees 27' 44" N Longitude: 120 degrees 44' 30" W **SUPERVISORIAL DISTRICT** # 5

B. EXISTING SETTING

PLAN AREA: North County **SUB**: Salinas River **COMM:** N/A

LAND USE CATEGORY: Residential Rural

COMB. DESIGNATION: Geologic Study

PARCEL SIZE: 12 acres

TOPOGRAPHY: Nearly level to steeply sloping

VEGETATION: Scattered Oaks, Shrubs, Grasses, Urban build-up

EXISTING USES: Single-family residence(s), mostly undeveloped

SURROUNDING LAND USE CATEGORIES AND USES:

North: Residential Rural; wireless facility, undeveloped	*East:* Residential Rural; residential
South: Residential Rural; state highway	*West:* Residential Rural; residential

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

The proposed project is located in a rural area of the County on the north side of Morro Road (Highway 41), approximately 0.7 miles west of the city limits of Atascadero. The project site is located on a hillside to the north of Morro Road. The equipment enclosure portion of the project is located approximately 400 feet north of Morro Road, and the antenna layout portion of the project is located approximately 600 feet north of Morro Road. The upper portions the proposed antennas and support poles will be visible from brief viewpoints of Morro Road and Escabroso Road. No portion of the project will be visible from other public viewing areas.

The surrounding area consists of Residential Rural zoned lots and is distinctly rural in character, with parcel sizes ranging from of approximately 2 to 20 acres. Topography in the area consists of rolling hills with moderate to steep slopes. The natural vegetation patterns of the area are predominately oak woodland, shrubs, grasses and herbaceous plant life. Typical of much of the region, the undeveloped portions of the project site are covered with the natural vegetation patterns of the area. Several parcels to the east of the project (east of Escabroso Road) appear to have agrarian uses and grazing pastures as the primary land uses. The surrounding area is a mix of agrarian uses, rural residences, and undeveloped lots. The project property is developed with an existing residence and accessory structures, and includes an existing unpaved road that would provide access up the hillside from Morro

Road to the proposed project site.

Regulatory Setting

Section 22.30.180 of 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.*

Impact. The applicant proposes a telecommunication facility with antennas and associated equipment located within an approximate 30-foot by 30-foot lease area, and a 308-square-foot equipment enclosure that includes a diesel standby emergency generator and associated equipment. The equipment enclosure is surrounded by 8-foot tall concrete masonry unit walls within a 23-foot by 15-foot lease area, located approximately 400 feet southwest of the proposed antenna support lease area.

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 landscape. The applicant submitted photo-simulations of the proposed facility from key viewing angles along Morro Road and Escabroso Road, and the photo-simulations demonstrate that the upper portions of the antennas and support poles will be visible from brief viewpoints along these roads. However, the stub-mount pole support design and the associated antennas would easily blend in with the natural landscape. The antennas would be covered with faux foliage antenna socks, and the stub-mount poles would be painted a non-reflective dark green color to blend with the backdrop vegetation. Because of the existing topography and surrounding vegetation, the proposed lease area enclosed by the concrete masonry unit walls would not be seen from any public viewing areas. The project design is consistent with the goals of the County's communications facilities ordinance.

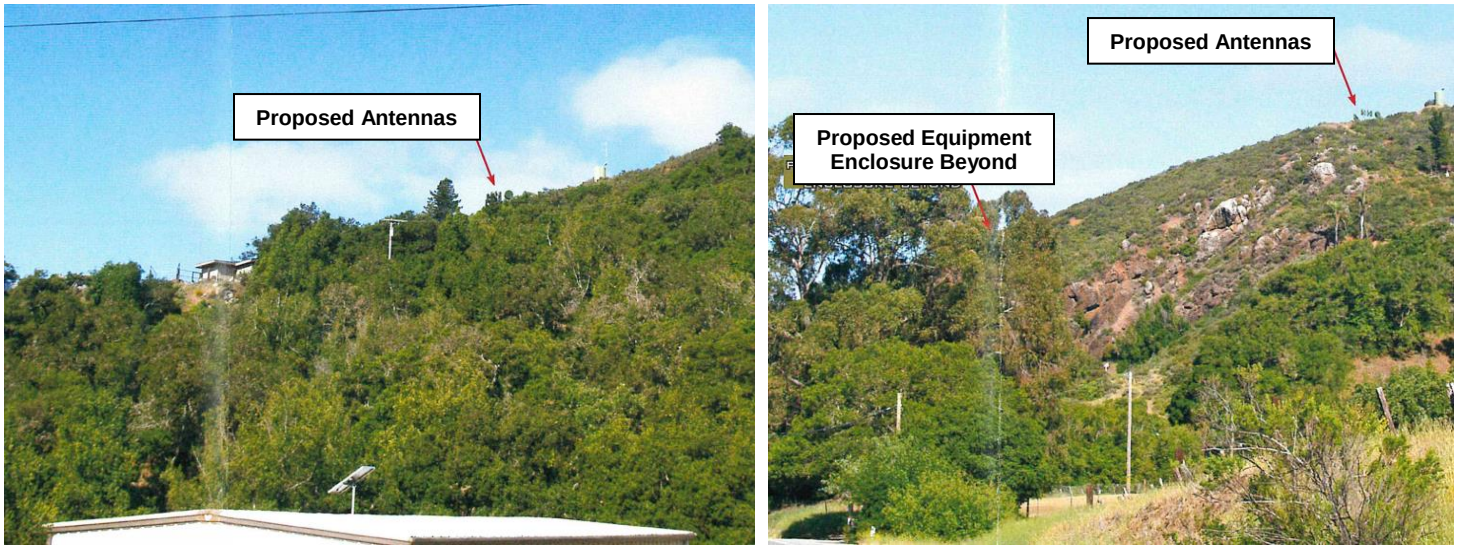


Figure 1: Photo simulation of the proposed project (Escabroso Road on the left, northwest view from Morro Road on the right).

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 tree canopy and vegetated hillside). The use of the natural features and topography will preserve and protect such features through the project site design. 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 artificial foliage antenna socks, with organic and realistic texture and foliage colors. In addition, the applicant is required to submit material and color test samples for all proposed improvements (including, but not limited to, panel antennas, microwave antennas, stub-mount poles, and all other associated equipment, etc.). The color to be used shall be a non-reflective dark green color to match the existing backdrop vegetation. 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: Residential Rural

State Classification: Not prime farmland

Historic/Existing Commercial Crops: None

In Agricultural Preserve? Yes, Atascadero AG Preserve Area

Under Williamson Act contract? No

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

McMullin-Rock outcrop complex (50 - 75 % slope). This very steeply sloping 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: steep slopes, shallow depth to bedrock. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

Lompico-McMullin complex (50 - 75 % slope).

Lompico. This very steeply sloping soil is considered moderately drained. The soil has moderate 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 VII without irrigation and Class is not rated when irrigated.

Ayar and Diablo soils (9 - 15 % slope).

Ayar. 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: shallow depth to bedrock, slow percolation. The soil is considered Class IV without irrigation and Class III when irrigated.

Impact. The project is located in a predominantly non-agricultural area with no agricultural activities occurring on the property or immediate vicinity. No significant impacts to agricultural resources are anticipated.

Mitigation/Conclusion. No mitigation measures are 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: _____	☐	☐	☐	☐

Air Quality

Setting.

The proposed project is within close proximity to serpentine rock and/or soil formation, which has the potential to contain naturally occurring asbestos. The closest serpentine rock outcrops are approximately 250 feet to the northeast. There are no active fault zones in the immediate area (the closest active fault zone for ultramafic rock is approximately 15 miles to the southwest). Consequently, the potential for naturally occurring asbestos to be encountered at the project site is low.

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).

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 1,980 square feet. 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.

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 wireless communication facility. 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. 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. No mitigation measures are necessary above what is already required by ordinance or regulation.

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?	☐	☐	☒	☐

4. BIOLOGICAL RESOURCES *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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: Oak woodland, shrubs, grasses, and herbaceous plant life

Name and distance from blue line creek(s): Morro Creek, approximately 550 feet to the south

Habitat(s): Coastal Live Oak Woodland

Site's tree canopy coverage: Approximately 15%

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

Plant Species:

Most beautiful jewel flower (*Streptanthus albidus spp. peramoenus*) List 1B

> The project is potentially within an area known to support the most beautiful jewel flower *(Streptanthus albidus spp*. *Peramoenus).* This annual herb is found on serpentinite soils in chaparral, cismontane woodland, valley and foothill grassland habitats between the 120 and 1000-meter elevation (395 to 3,280 feet). The typical blooming period is April-June. The most beautiful jewel flower is considered rare by CNPS (List 1B) and federally a species of concern.

Ojai fritillary (*Fritillaria ojaiensis*) List 1B

> The project is potentially within an area known to support this species the Ojai fritillary (*Fritillaria ojaiensis*). This perennial herb is found on rocky soils in broadleaved upland forest, chaparral, and lower montane coniferous forest areas at elevations between 300 to 670 meters (985 to 2,200 feet). The typical blooming period is March-May. The Ojai fritillary is considered rare by CNPS (List 1B, RED 3-2-3).

San Luis Obispo mariposa lily (*Calochortus simulans*) List 1B

The project is potentially within an area known to support the San Luis Obispo mariposa lily (*Calochortus simulans)*. This perennial herb is endemic to San Luis Obispo and Santa Barbara County. The San Luis Obispo mariposa lily is found on dry, serpentine soils in chaparral, cismontane woodland, lower montane coniferous forest, and valley and foothill grasslands between the 395 to 1100-meter elevations (1,296 to 3,609 feet). This species blooms from April to May. The California Native Plant Society (CNPS) considers this species rare (List 1B, RED 2-1-3).

Wildlife Species:

California red-legged frog (*Rana draytonii*) FT

The project is potentially within an area known to support the California red-legged frog *(Rana draytonii)*. The California red-legged frog is considered federally threatened. This species typically inhabits shorelines with extensive vegetation. The frog requires 11 to 20 weeks of permanent water for larval development.

Coast Range newt (*Taricha torosa*)

The project is potentially within an area known to support the Coast Range newt *(taricha torosa)*. The coast range newt has a light to dark brown dorsum with a yellowish orange belly. Skin is dry with small bumps and warts; large eyes with lower yellow eyelids. Adults are between 12.5-20 cm in total length. The newt ranges between Mendocino Co. south through the Coast range to the western slope of the Peninsular ranges in San Diego Co. Adults are found in mesic forests in mountainous areas of Northern California. In Southern California they are found in drier habitats, such as woodlands or grasslands. In the Sierras they are found in conifer habitats. Breeding season occurs between late December and early May, lasting 6-12 weeks and occurring primarily in ponds and lakes.

Western pond turtle (Emys marmorata pallida), CSC, FSC

The project is potentially within an area known to support the western pond turtle *(Emys marmorata pallida).* The western pond turtle is a federal and California Species of Special Concern. This is an aquatic turtle that uses upland habitat seasonally. They occur in ponds, streams, lakes, ditches, and marshes. The species prefers slow-water aquatic habitat with available basking sites nearby. Hatchlings require shallow water habitat with relatively dense submergent vegetation for foraging.

Impact. The proposed project involves construction of an unmanned wireless communication facility with a 345-square-foot equipment area and a 900-square-foot antenna area with stub-mount pole support structures and associated antennas. The project will result in the disturbance of 1,980 square feet. The project footprint areas are vegetated with ruderal grasses and are disturbed by anthropogenic activities including access roads and walking trails/paths, and as a result, lack native vegetation. There are no trees located directly within the footprint of the equipment site or antenna site, and the existing access road will not require removal of existing trees. The immediate project site does not contain suitable habitat for the California red-legged frog, Coast Range newt, and Western pond turtle. The project site would not impact any nearby creeks or tributaries, and would not disturb sensitive native vegetation, significant wildlife species, or special status species.

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

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 Obispeno Chumash and Salinan. No historic structures are present and no paleontological resources are known to exist in the area.

In order to meet AB52 Cultural Resources requirements, outreach to four Native American tribal groups had been conducted (Northern Salinan, Xolon Salinan, Yak Tityu Tityu Northern Chumash, and the Northern Chumash Tribal Council) on August 21, 2018. Comments were received from the Northern Chumash Tribal Council on August 22, 2018, recommending a pine tree design be chosen for the site. Due to the lack of existing pine trees in the project vicinity, and the facility's location on a prominent hillside, staff determined that the pine tree design would add a substantial amount of mass to the hillside, drawing visual attention to the site. The stub-mount antenna pole structure design is an aesthetically suitable alternative since it would minimize the amount of mass on the hillside and comprises a small percentage of the overall viewshed and is visually subordinate to the surrounding visual quality of the area. No evidence of cultural materials was noted in the comments received from the Northern Chumash Tribal Council.

Impact. The project is not located in an area that would be considered culturally sensitive due to lack of physical features typically associated with prehistoric occupation. The project is not 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. No evidence of cultural materials was noted on the property. Impacts to historical or paleontological resources are not expected.

Mitigation/Conclusion. County Land Use Ordinance Section 22.10.040 includes a provision that construction work cease in the event resources are unearthed with work allowed to continue once the issue is resolved. No significant cultural resource impacts are expected to occur, and no mitigation measures beyond what is already required by ordinance 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?*	☐	☐	☒	☐

6. GEOLOGY AND SOILS *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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: _____	☐	☐	☐	☐

* **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: Moderate to high

Liquefaction Potential: Low

Nearby potentially active faults? No Distance? Not applicable

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

Shrink/Swell potential of soil: Low to high

Other notable geologic features? None

The County's Land Use Ordinance includes provisions to address geological problem areas, drainage, and sedimentation and erosion control.

The project is within the Geologic Study area designation or within a high liquefaction area and will be required to prepare a geotechnical report at the time of application for a building permit. The report is to evaluate the area's geological stability relating to the proposed use. The report will address potential geologic hazards such as (but not limited to) the locations of known active faults and the potential for surface ground rupture, the potential for liquefaction, and the potential for landslide hazards.

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.

Impact. This project proposes approximately 1,980 square feet of ground disturbance to construct an

unmanned wireless communications facility. If adequate temporary and permanent measures are not taken before, during and after vegetation removal and grading, erosion of graded areas and discharge of sediment into nearby drainages will likely result. If not properly mitigated, these impacts, both on the project site and within surrounding areas, may be significant.

Mitigation/Conclusion. Impacts related to geology and soils would be less than significant because adequate mitigation will occur through the implementation of Titles 19 and 22. 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

7. HAZARDS & HAZARDOUS MATERIALS - *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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 the Airport Review area. With regards to potential fire hazards, the subject property is within the 'high' or 'very high' Fire Hazard Severity Zone. Based on the County's fire response time map, it will take approximately 10-15 minutes to respond to a call regarding fire or life safety. The project would require verification from the responsible fire agency that all conditions regarding potential fire hazards have been met prior to final approval. The proposed project does not present a significant fire safety risk, as it is an unmanned communications facility that does not involve structures for human habitation. 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 Radio Frequency (RF) 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 1, 2018), the maximum level of RF emissions from the proposed facility at ground-level would be equivalent to 104.82 percent of the applicable public exposure limit. These results include several "work-case" assumptions and therefore are expected to overstate actual power density levels. Although the RF emissions exposure exceeds the occupational limits, the report includes recommended measures that would bring the proposed facility into compliance with the Federal Communications Commission's RF exposure limits. These measures include facility perimeter barriers, posted signage, and restriction of access points to the proposed facility. The project is conditioned to incorporate the recommendations in the RF report.

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?	☐	☐	☒	☐

8. NOISE

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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 project is within close proximity to a transportation noise source (Highway 41) and development within specific distances from the noise source will exceed the County's acceptable exterior noise threshold of 60 dBs for sensitive uses.

The proposed unmanned wireless communications facility is not considered a sensitive noise receptor. The nearest sensitive noise receptor to the site is an existing residence which is located approximately 250 feet to the east.

Impact. The proposed project would introduce noise generating equipment into a residential rural area. The facility's primary noise source includes an emergency back-up generator. The emergency generator is intended to power the facility in the event of a power outage. It would also be operated for about 15 minutes each month for routine maintenance and testing. As conditioned, the generator would only be operated for testing during day-time hours. In addition, the proposed facility will be unmanned and as such would not be considered noise sensitive.

Mitigation/Conclusion. No significant noise impacts are anticipated, and no mitigation measures are necessary. As a standard condition of approval to ensure the project will not conflict with any sensitive noise receptors (e.g., residences), 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 emergency generators). Implementation of these existing requirements would reduce noise impacts to a less than significant level.

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)?	☐	☐	☒	☐

9. POPULATION/HOUSING *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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 therefore 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: City of Atascadero Location: Templeton (Approximately 13 miles to the northeast)

Fire: Cal Fire (formerly CDF) Hazard Severity: Unknown Response Time: 10-15 minutes

Location: Approximately 0.75 miles to the Morro Toro Fire Station (14)

School District: Atascadero Unified School District. San Luis Obispo Joint Community College 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. The proposed project was referred to County Fire/Cal Fire for review and will be reviewed again at the time of building permit submittal to ensure if a fire safety plan is required.

Mitigation/Conclusion. The proposed facility would be unmanned and would not result in any significant impacts to public services or utilities. 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. Therefore, no mitigation measures are necessary.

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?	☐	☐	☒	☐

12. TRANSPORTATION/CIRCULATION *Will the project:*	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
b) Reduce existing "Level of Service" on public roadway(s)?	☐	☐	☒	☐
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 area as "C" or better. The existing road network in the area including the project's access roads (Morro Road / Highway 41 and Escobaroso Road) is operating at acceptable levels. Based on existing road speeds and configuration (vertical and horizontal road curves), sight distance is considered acceptable.

Impact. The proposed project is estimated to generate about 1 vehicle trip every 6 to 8 weeks for routine maintenance. No other trips would be generated by the proposed facility. This small amount of traffic would not result in a significant change to the existing road service levels or traffic safety.

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

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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/Impact. The proposed project is an unmanned wireless telecommunication facility and would not generate wastewater or require wastewater disposal.

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

14. WATER & HYDROLOGY

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
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?	☐	☐	☒	☐

14. WATER & HYDROLOGY

Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
QUANTITY				
h) Change the quantity or movement of available surface or ground water?	☐	☐	☒	☐
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 proposed unmanned wireless communications facility does not propose any water usage.

The topography of the project is nearly level to very steeply sloping The closest creek from the proposed development is approximately 550 feet to the east of the proposed site location. As described in the NRCS Soil Survey, the soil surface is considered to have low to moderate erodibility.

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

Within the 100-year Flood Hazard designation? No

Closest creek? Morro Creek Distance? Approximately 550 feet

Soil drainage characteristics: Very poorly drained to moderately 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 agency that monitors this program.

Impact – Water Quality/Hydrology

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

- ✓ Approximately 1,980 square feet 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 is not on highly erodible soils;
- ✓ The project is not within a 100-year Flood Hazard designation;
- ✓ The project is more than 100 feet from the closest creek or surface water body;

Water Quantity

Based on the project description, the project will not use any water.

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 and no significant impacts from water use are anticipated.

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, Environmental Health for Hazardous Business Plan, etc.). The project was found to be consistent with these documents (refer also to Exhibit A on reference documents used).

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

1. LUO Section 22.94.080 (Salinas River Sub-Area)
2. LUO Section 22.10.095 (Highway Corridor Design Standards)

The proposed project complies with this standard.

Although the proposed communications facility is not a use that is inherently compatible with the visual character of the surrounding residential and rural agrarian landscapes, the proposed project is a stealth design that would blend with the surrounding landscape. Since the proposed facility would visually blend with the landscape, it would not be readily discernable as a wireless communications facility. This is consistent with the visual screening standards for wireless communications facilities (Section 22.30.180(C)(3)(d)) which requires new facilities to either be completely screened by vegetation or disguised to resemble natural or built features of the landscape.

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	**Attached**
☐	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)	**None**
☐	CA Department of Transportation	**Not Applicable**
☐	Community Services District	**Not Applicable**
☐	Other _____	**Not Applicable**
☐	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
- ☒ North County Area Plan/Salinas River 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:

EBI Consulting, *Radio Frequency Report,* October 1, 2018

Velotera Services Inc., *Photo-Simulations,* May 25, 2018

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 (Visual Resources)

VR-1. **Prior to issuance of a construction permit,** the applicant shall submit to the Department of Planning and Building for review and approval a color board for all visible elements of the proposed facility (including, but not limited to, panel antennas, microwave antennas, remote radio units, stub-mount poles, coaxial cables, and all other associated equipment, etc.). The color to be used shall be a non-reflective dark green color (Frazee Blackened Beam or equivalent) to blend with the existing backdrop vegetation.

VR-2 **Prior to issuance of a construction permit,** the applicant shall submit to the Department of Planning and Building for review and approval photographs of the actual antenna sock to be used to cover the antennas. The antenna socks shall be of the highest available faux foliage density, shall provide 100 percent coverage of the antenna, and shall be of a sufficient design and color to blend with the existing backdrop vegetation.

DEVELOPER'S STATEMENT FOR
AT&T MOBILITY
CONDITIONAL USE PERMIT DRC2018-00129

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. Prior to issuance of a construction permit, the applicant shall submit to the Department of Planning and Building for review and approval a color board for all visible elements of the proposed facility (including, but not limited to, panel antennas, microwave antennas, remote radio units, stub-mount poles, coaxial cables, and all other associated equipment, etc.). The color to be used shall be a non-reflective dark green color (Frazee Blackened Beam or equivalent) to blend with the existing backdrop vegetation.

VR-2 Prior to issuance of a construction permit, the applicant shall submit to the Department of Planning and Building for review and approval photographs of the actual antenna sock to be used to cover the antennas. The antenna socks shall be of the highest available faux foliage density, shall provide 100 percent coverage of the antenna, and shall be of a sufficient design and color to blend with the existing backdrop vegetation.

Monitoring: (Visual Recourse Measures VR-1 to VR-2) Required at the time of application for construction permits. Compliance will be verified by the County Department of Planning and Building.

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.

Signature of Agent(s)

February 5, 2019
Date

Vance Pomeroy o/b/o AT&T
Name (Print)

AT&T Radio Frequency Safety Survey Report Prediction (RFSSRP)

Site Name: Williams
FA#: 13790143
USID: 173731
Site ID: CSL02637
Address: 14670 Morro Road
Atascadero, California 93422
County: San Luis Obispo
Latitude: 35.462500
Longitude: -120.741700

M-RFSC Name: Essie Polard
Site Structure Type: Poles
PACE#: MRLOS032230/MRLOS034326
Prepared For: AT&T Mobility, LLC
3939 E Coronado Street
Anaheim, California 92807

Report Information:

Report Writer: Adam Piombino
Report Date: October 1, 2018

CDs: CSL02637_ZDs_01.02.2018
RFDS: CSL02637_2017-eNode-B_FWLL-1C_ts404y_3551A06RCI_13790143_173731_10-07-2016_As-Built-In-Progress_v1.00

Compliance Statement:

AT&T Mobility Compliance Statement: Based on the information collected, AT&T Mobility will be Compliant with FCC Rules and Regulations at the nearest walking surface if recommendations in the Compliance Summary are implemented.

EBI Consulting
environmental | engineering | due diligence

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) modeling for AT&T Site CSL02637 located at 14670 Morro Road in Atascadero, California to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Appendix A of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

1.1 SITE SUMMARY

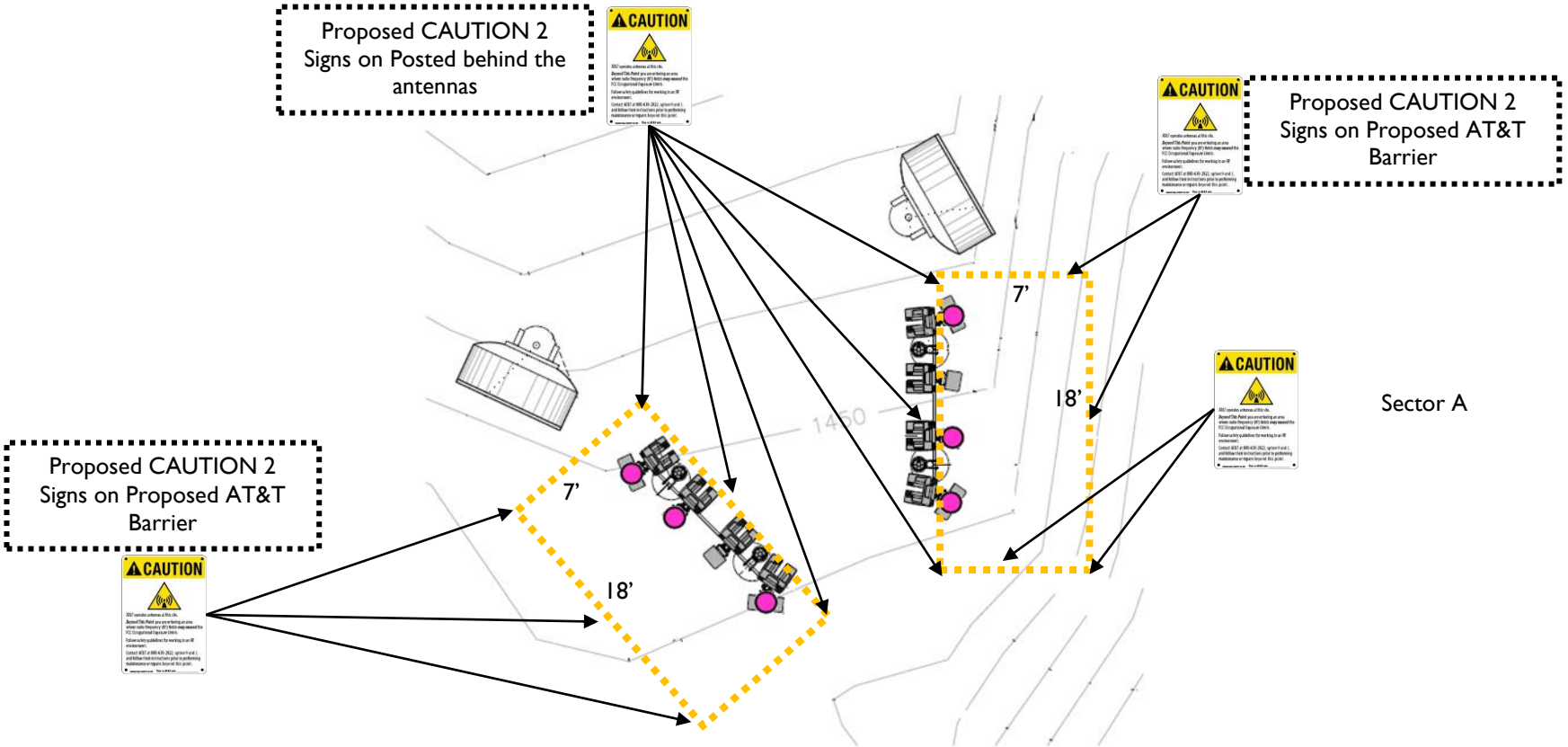
Recommended Mitigation at the Site:

- Access Point(s):
    - To reduce the risk of exposure and/or injury, EBI recommends that access to the poles or areas associated with the active antenna installation be restricted and secured where possible.
- Signage at AT&T Mobility Sectors:
    - A: Yellow CAUTION 2 signs posted behind the antennas and every 8 feet on the barrier near the antennas.
    - B: Yellow CAUTION 2 signs posted behind the antennas and every 8 feet on the barrier near the antennas..
- Barriers at AT&T Mobility Sectors:
    - A: 7' X 18' in front of the antennas.
    - B: 7' X 18' in front of the antennas..

Predictive Modeling Results:

The maximum predictive power density generated by the antennas is approximately 524.10 percent of the FCC's general public limit (104.82 percent of the FCC's occupational limit) at the ground.

2.0 SIGNAGE AND MITIGATION PLAN



Sign Identification Legend			
NOTICE	AT&T NOTICE DECAL Sign	CAUTION	AT&T CAUTION 2 – Rooftop Sign
NOTICE	AT&T NOTICE 2 Sign	CAUTION	AT&T CAUTION 2B – Tower Sign
WARNING	AT&T WARNING 2 Sign	CAUTION	AT&T CAUTION 2C – Parapet Sign

AT&T Antennas

3.0 ANTENNA INVENTORY

Antenna #	Operator	Antenna Type	TX Freq (MHz)	# of TX	ERP (Watts)	Gain (dBd)	Antenna Model	Azimuth (deg.)	Length (feet)	Horizontal Beamwidth (Degrees)	X	Y	Z (Ground)
ATT A1	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R-BUU-H6	125	6.0	28	47	34	5.0
ATT A2	AT&T	Panel	LTE 700	2	991.18	12.85	Quintel QS8658-3e	100	8.0	64	47	38	4.0
ATT A4	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R-BUU-H6	65	6.0	28	47	44	5.0
ATT B1	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R-BUU-H6	245	6.0	28	30	36	5.0
ATT B2	AT&T	Panel	LTE 700	2	991.18	12.85	Quintel QS8658-3e	230	8.0	64	33	34	4.0
ATT B4	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R-BUU-H6	185	6.0	28	37	30	5.0

• Note there are 3 AT&T antennas per sector at this site. For clarity, the different frequencies for each antenna are entered on separate lines.
• Note that formulas from OET Bulletin 65 were used to calculate a worst-case prediction of the maximum permissible exposure (MPE) at ground level and nearest walking surfaces for the microwave dishes. RoofView is not suitable for modeling microwave dish antennas because these units are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage.

4.0 WORST-CASE PREDICTIVE MODELING

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofView® software to estimate the worst-case power density at the site ground-level resulting from operation of the antennas.

For this report, EBI utilized antenna and power data provided by AT&T and compared the resultant worst-case MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65.

The assumptions used in the modeling are based upon information provided by AT&T and information gathered from other sources. There were other carriers in the vicinity, including T-Mobile. Information about these antennas was not available, so they were not included in the modeling analysis.

Based on worst-case predictive modeling, the worst-case emitted power density may exceed the FCC's general public limit within approximately 7 feet of AT&T's Sector A and B antennas on ground level. Modeling also indicates that the worst-case emitted power density may exceed the FCC's occupational limit within approximately 2 feet of AT&T's Sector A and B antennas on ground level.

At the nearest walking/working surfaces to the AT&T antennas on the ground, the maximum power density generated by the AT&T antennas is approximately 524.10 percent of the FCC's general public limit (104.82 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 524.10 percent of the FCC's general public limit (104.82 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna.

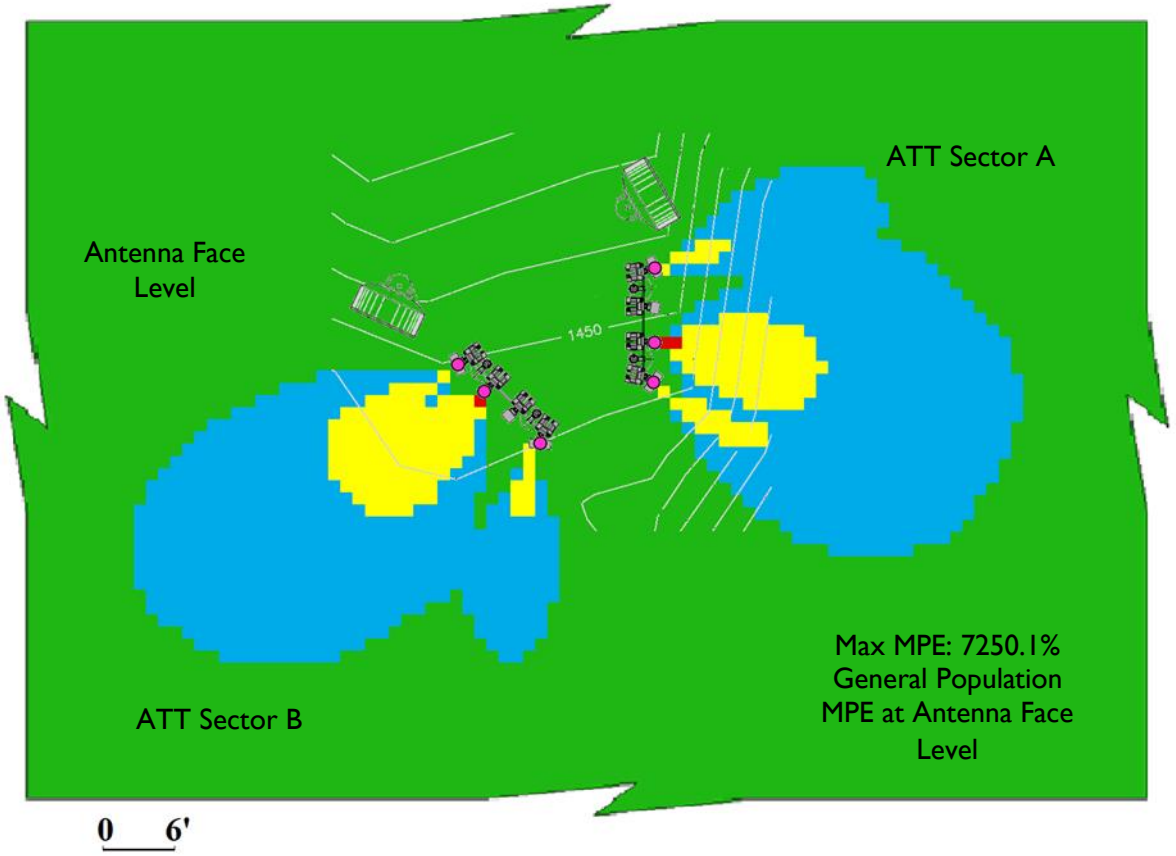
It should be noted that RoofView® is not suitable for modeling microwave dish antennas; however, these units are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage. Based on AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. There were 2 AT&T microwaves included in the modeling analysis. Formulas from OET Bulletin 65 were used to calculate a worst-case prediction of the maximum power density (MPE) at ground level and nearest walking surfaces for these microwave dishes. Power density estimates used for the microwave dishes proposed for installation at this site are included in the Appendices. At the nearest walking/working surfaces to the AT&T antennas, the maximum power density generated by all carrier antennas, including microwaves and panel antennas, is approximately 524.2151 percent of the general public limit (104.8431 percent of the occupational limit). At 100 feet from the AT&T antennas, the maximum power density generated by all carrier antennas, including microwaves and panel antennas, is approximately 0.54 percent of the general public limit.

Site Name: Williams
Site FA: 13790143

Antenna Face Simulation

EBI Project Number: 6218004104
6

AT&T Antennas



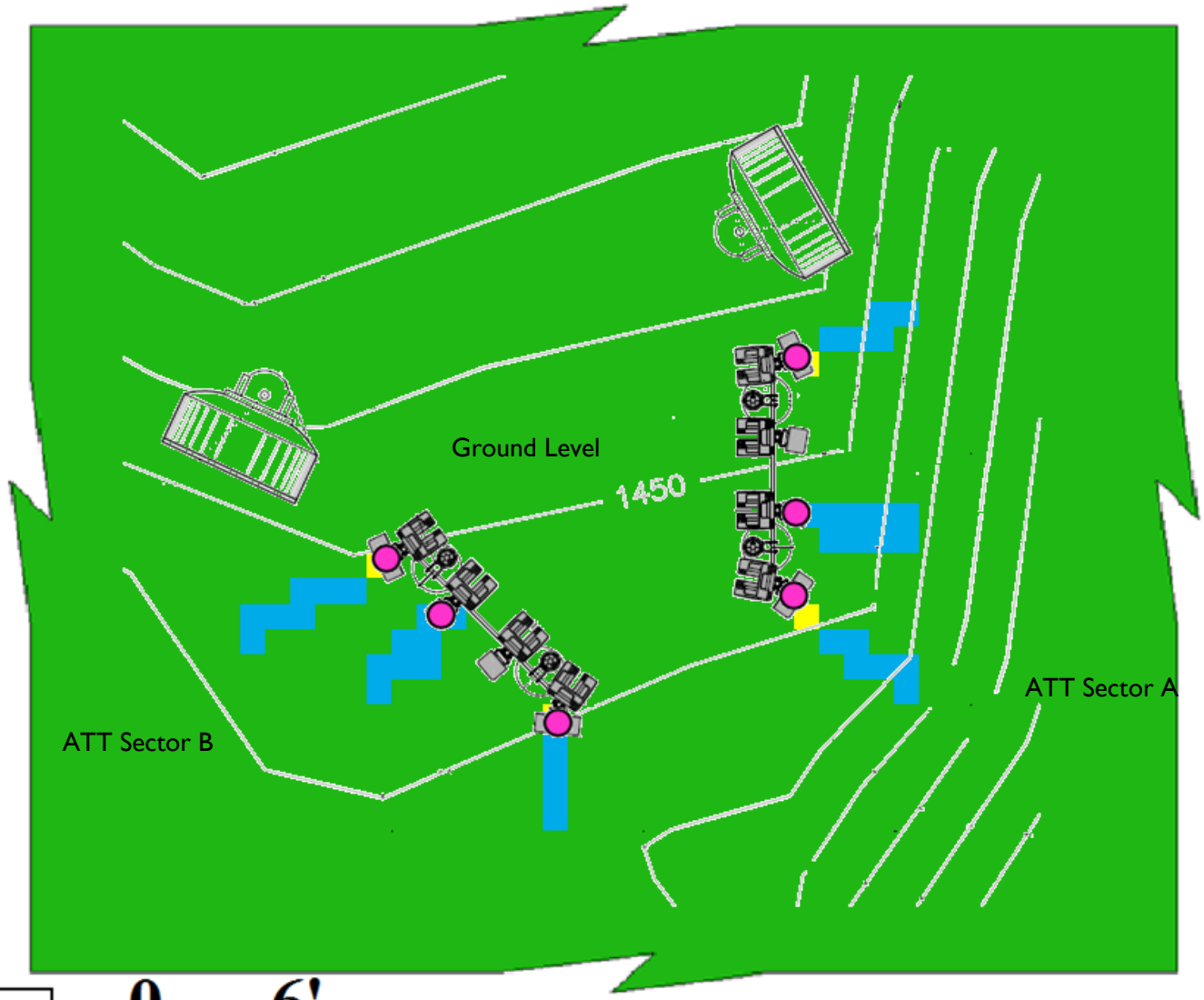
% FCC Public Exposure Limit
Exposure Level ≥ 5,000
500 < Exposure Level ≤ 5,000
100 < Exposure Level ≤ 500
Exposure Level ≤ 100

Site Name: Williams
Site FA: 13790143

Ground Level Simulation

EBI Project Number: 6218004104
7

AT&T Antennas



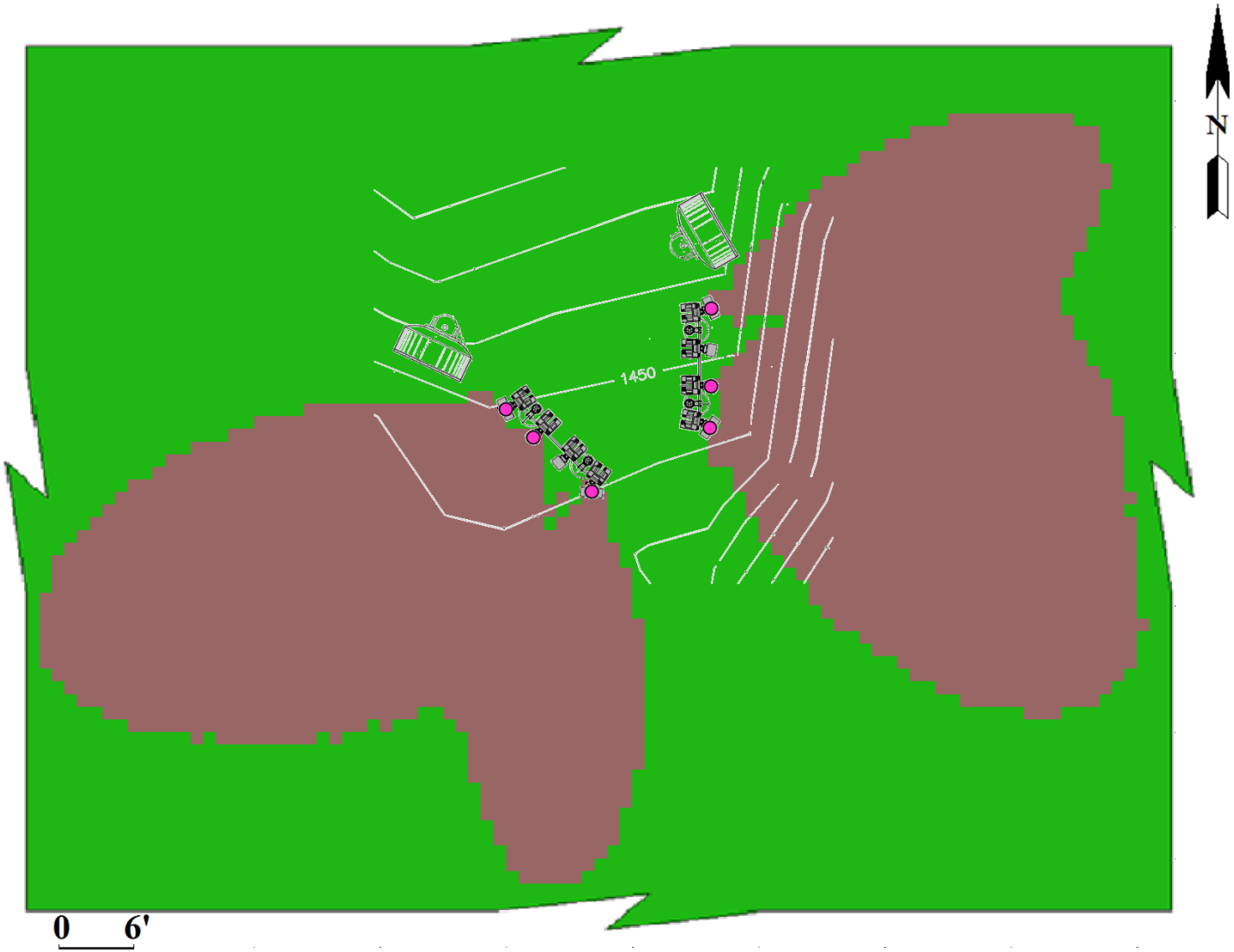
% FCC Public Exposure Limit
Exposure Level ≥ 5,000
500 < Exposure Level ≤ 5,000
100 < Exposure Level ≤ 500
Exposure Level ≤ 100

Max MPE: 524.1%
General Population
MPE at Ground Level

Site Name: Williams
Site FA: 13790143

EBI Project Number: 6218004104
8

AT&T Antennas



% FCC Public Exposure Limit

Exposure Level > 5

Exposure Level ≤ 5

Note that the areas shown in brown are where AT&T antennas contribute more than 5% of the FCC's general exposure RF limit. These do not overlap any areas in front of other carrier antennas exceeding the FCC's general exposure RF limit because there are no other carriers modeled as shown in Figure 1. Under FCC regulations, AT&T is therefore not responsible for predicted exceedances of another carrier's antennas.

5.0 ROOFVIEW® EXPORT FILE

StartMapDefinition																						
Roof Max	Roof Max	Map Max	Map Max	Y Offset	X Offset	Number (	envelope														List Of Areas	
120	100	150	120	20	20	1	$AE$81:$I	$AE$81:$DZ$200													$AE$81:$DZ$200	
StartSettingsData																						
Standard	Method	Uptime	Scale Fac	Low Thr	Low Colo	Mid Thr	Mid Colo	Hi Thr	Hi Color	Over Colc	Ap Ht Mu	Ap Ht Method										
4	2	1	1	100	1	500	4	5000	2	3	1.5	1										
StartAntennaData	It is advisable to provide an ID (ant 1) for all antennas																					
		(MHz)	Trans	Trans	Coax	Coax	Other	Input	Calc			(ft)	(ft)	(ft)		(ft)	dBd	BWdth	Uptime	ON		
ID	Name	Freq	Power	Count	Len	Type	Loss	Power	Power	Mfg	Model	X	Y	Z	Type	Aper	Gain	Pt Dir	Profile	flag		
ATT A1	LTE	2300	25	4	10	1/2 LDF	0.5			CCI	HPA-33R-	47	34	4.98		6.04	17.95	28;125		ON•		
ATT A2	LTE	700	30	2	10	1/2 LDF	0.5			Quintel	QS8658-3	47	38	4		8	12.85	64;100		ON•		
ATT A4	LTE	2300	25	4	10	1/2 LDF	0.5			CCI	HPA-33R-	47	44	4.98		6.04	17.95	28;65		ON•		
ATT B1	LTE	2300	25	4	10	1/2 LDF	0.5			CCI	HPA-33R-	30	36	4.98		6.04	17.95	28;245		ON•		
ATT B2	LTE	700	30	2	10	1/2 LDF	0.5			Quintel	QS8658-3	33	34	4		8	12.85	64;230		ON•		
ATT B4	LTE	2300	25	4	10	1/2 LDF	0.5			CCI	HPA-33R-	37	30	4.98		6.04	17.95	28;185		ON•		
StartSymbolData																						
Sym	Map Mar	Roof X	Roof Y	Map Labe	Description (notes for this table only)																	
Sym		5	35	AC Unit	Sample symbols																	
Sym		14	5	Roof Access																		
Sym		45	5	AC Unit																		
Sym		45	20	Ladder																		

6.0 COMPLIANCE SUMMARY

Based on the information collected, AT&T Mobility will be Compliant with FCC Rules and Regulations at the nearest walking surface if recommendations in the Compliance Summary are implemented.

The following mitigation measures are recommended for this site.

- **Access Point(s):**
    - To reduce the risk of exposure and/or injury, EBI recommends that access to the poles or areas associated with the active antenna installation be restricted and secured where possible.

- **AT&T Mobility Sectors:**
    - **Sector A:**
        - Yellow CAUTION 2 signs posted behind the antennas and every 8 feet on the barrier near the antennas.
        - 7' X 18' in front of the antennas.
    - **Sector B:**
        - Yellow CAUTION 2 signs posted behind the antennas and every 8 feet on the barrier near the antennas.
        - 7' X 18' in front of the antennas.

7.0 APPENDICES

Appendix A: FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/ controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table 1 and Figure 1 (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm^2). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm^2) and an uncontrolled MPE of 1 $mW/cm2$ for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 850 MHz, the FCC's occupational MPE limit is 2.83 mW/cm^2 and an uncontrolled MPE limit of 0.57 mW/cm^2. For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE limit is 2.33 mW/cm^2 and an uncontrolled MPE limit of 0.47 mW/cm^2. These limits are considered protective of these populations.

Table 1: Limits for Maximum Permissible Exposure (MPE)

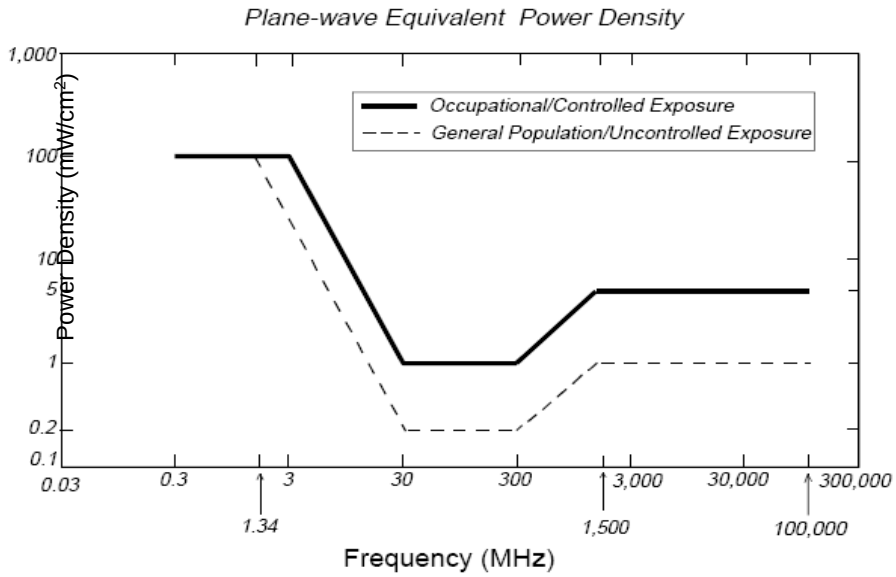
(A) Limits for Occupational/Controlled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $[E]^2$, $[H]^2$, or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1.0	6
300-1,500	--	--	f/300	6

Table 1: Limits for Maximum Permissible Exposure (MPE)				
(A) Limits for Occupational/Controlled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
1,500-100,000	--	--	5	6
(B) Limits for General Public/Uncontrolled Exposure				
Frequency Range (MHz)	**Electric Field Strength (E) (V/m)**	**Magnetic Field Strength (H) (A/m)**	**Power Density (S) (mW/cm^2)**	**Averaging Time $[E]^2$, $[H]^2$, or S (minutes)**
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	($180/f^2$)*	30
30-300	27.5	0.073	0.2	30
300-1,500	--	--	f/1,500	30
1,500-100,000	--	--	1.0	30

f = Frequency in (MHz)
* Plane-wave equivalent power density

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm^2	1.00 mW/cm^2
Cellular Telephone	870 MHz	2.90 mW/cm^2	0.58 mW/cm^2
Specialized Mobile Radio	855 MHz	2.85 mW/cm^2	0.57 mW/cm^2
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm^2	0.47 mW/cm^2
Most Restrictive Freq, Range	30-300 MHz	1.00 mW/cm^2	0.20 mW/cm^2

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

Appendix B: AT&T RF EXPOSURE POLICY REQUIREMENTS

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

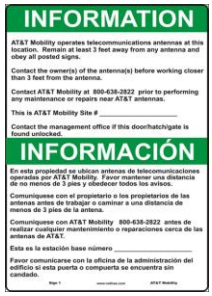
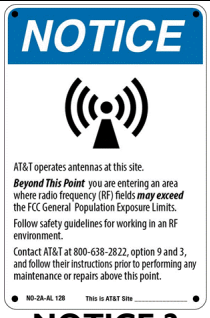
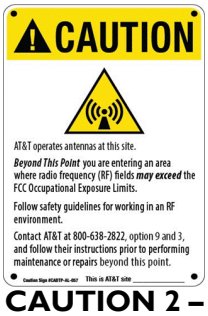
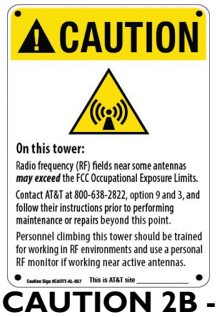
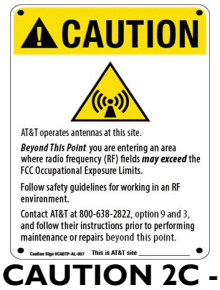
1. All sites must be analyzed for RF exposure compliance;
2. All sites must have that analysis documented; and
3. All sites must have any necessary signage and barriers installed.

Appendix C: AT&T Signage and Mitigation

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.

Informational Signs – No longer in Use		Alerting Signs	
	**INFO 1**		
		NOTICE 1	**NOTICE 2**
	**INFO 2**		
		NOTICE DECAL	
	**INFO 3**		
		CAUTION 2 – ROOFTOP	**CAUTION 2B - TOWER**
	**INFO 4**		
		CAUTION 2C - PARAPETS	**WARNING 2**

Appendix D: LIMITATIONS

This report was prepared for the use of AT&T Mobility, LLC to meet requirements outlined in AT&T's corporate RF safety guidelines. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information provided by the client. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix E: ROOFVIEW®

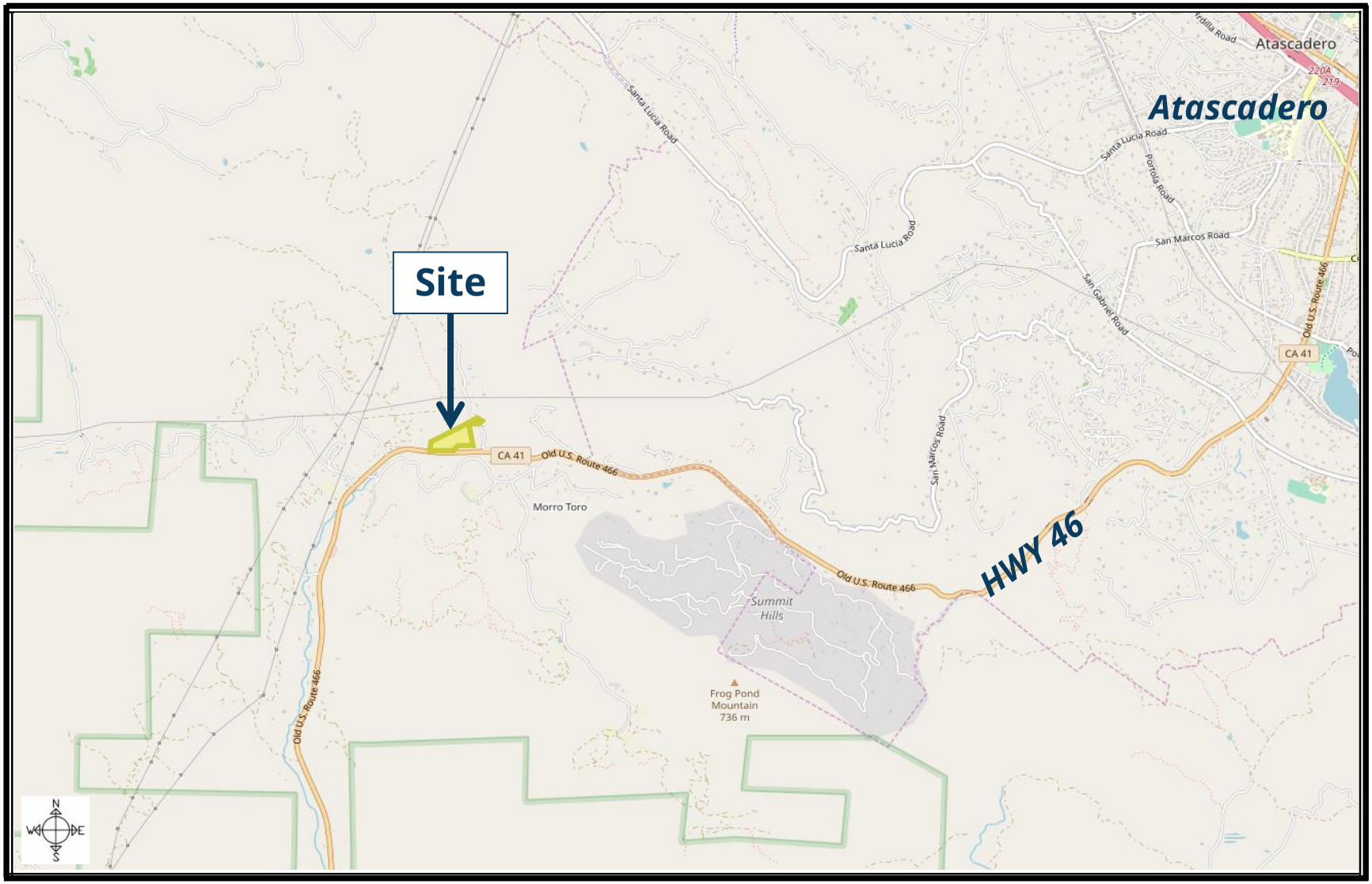
RoofView® is a widely-used predictive modeling program that has been developed by Richard Tell Associates to predict both near field and far field RF power density values for roof-top and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit.

Appendix F: CERTIFICATIONS

Preparer Certification

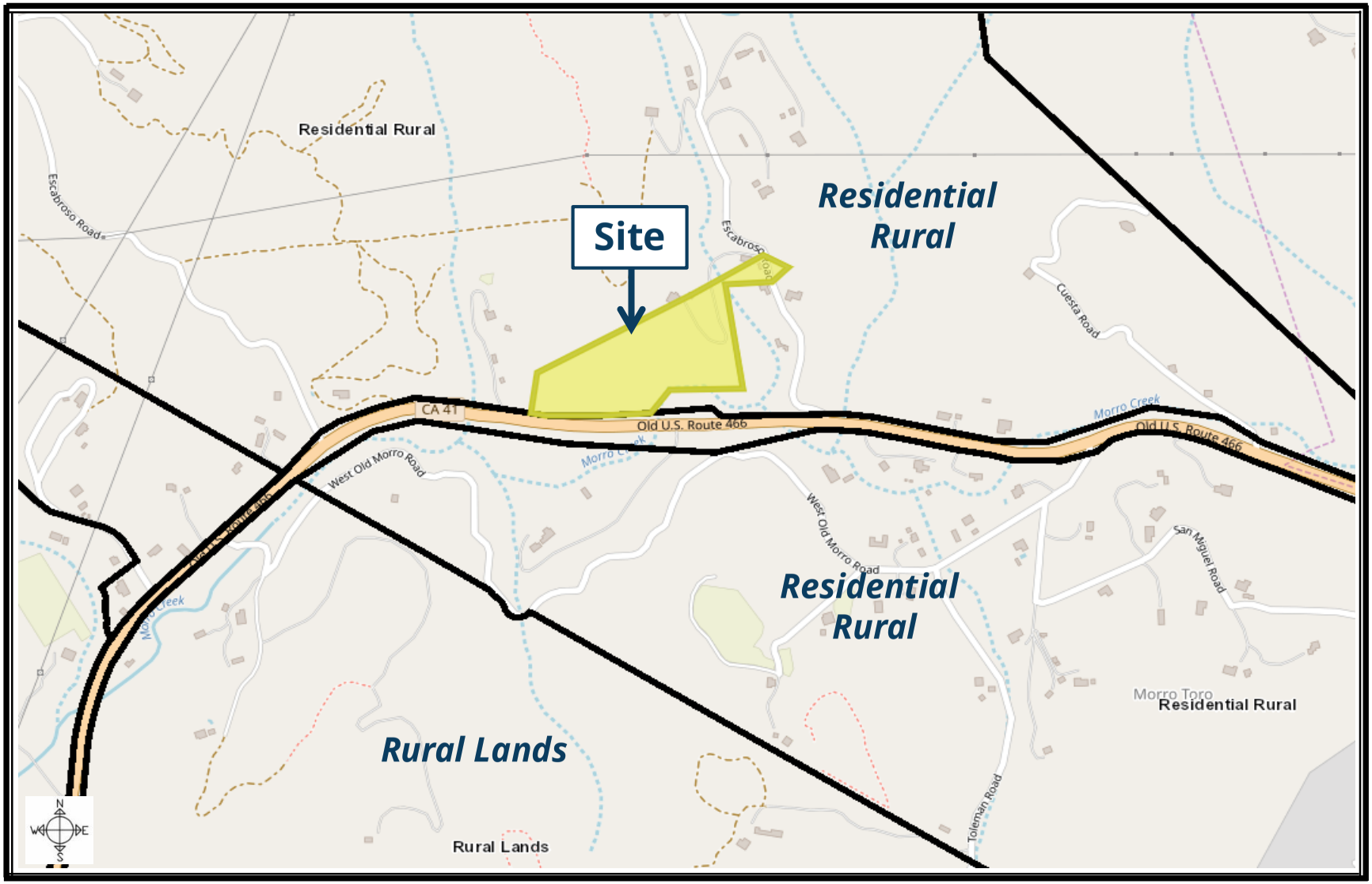
I, Adam Piombino, state that:

- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am familiar with the FCC rules and regulations as well as OSHA regulations both in general and as they apply to RF-EME exposure.
- I have been trained in on the procedures outlined in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document (dated October 28, 2014) and on RF-EME modeling using RoofView® modeling software.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.



COUNTY OF SAN LUIS OBISPO

Vicinity Map
DRC2018-00129

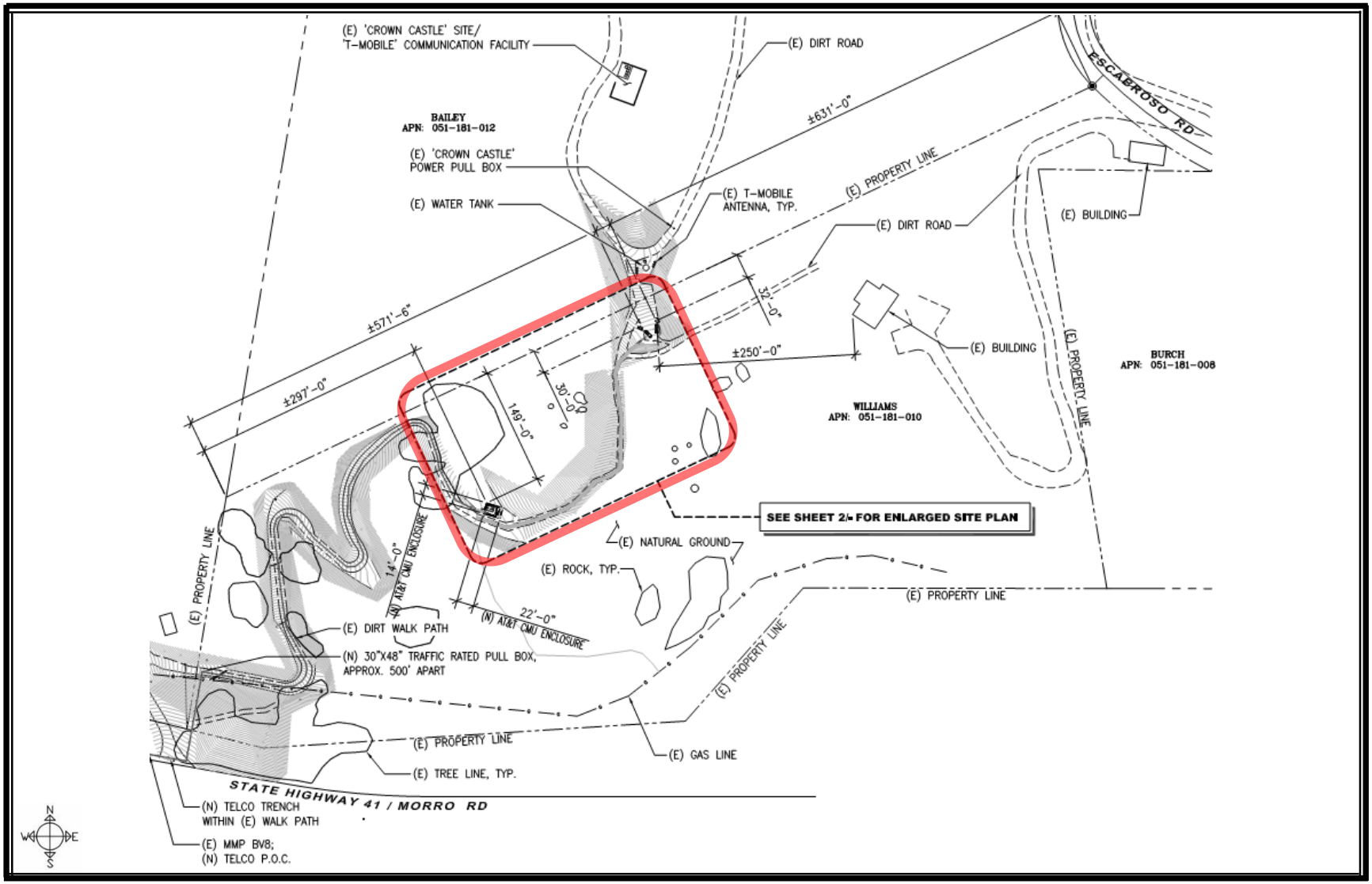


COUNTY OF SAN LUIS OBISPO

Land Use Category Map
DRC2018-00129

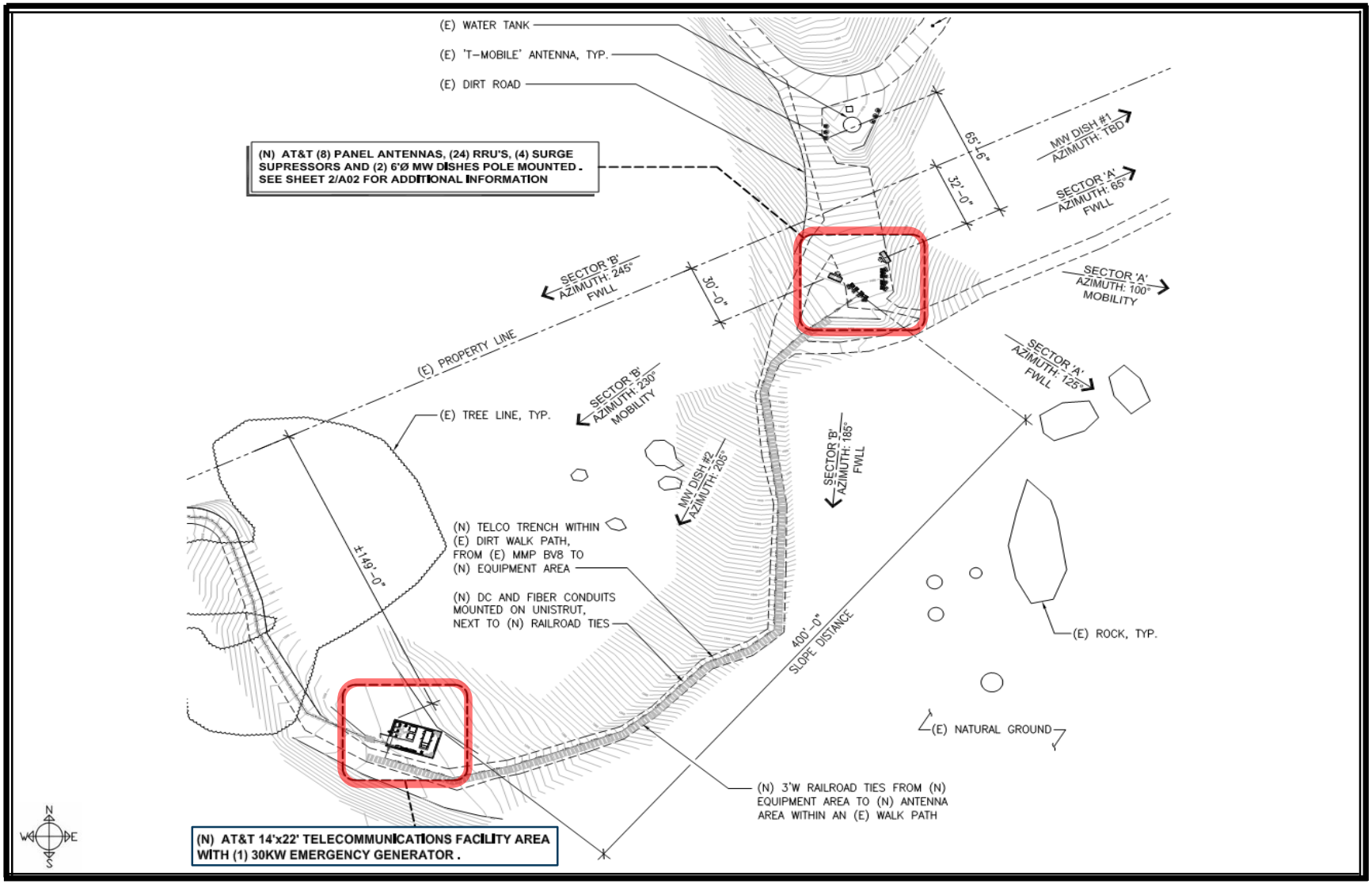
COUNTY OF SAN LUIS OBISPO

Aerial – Overall Site
DRC2018-00129



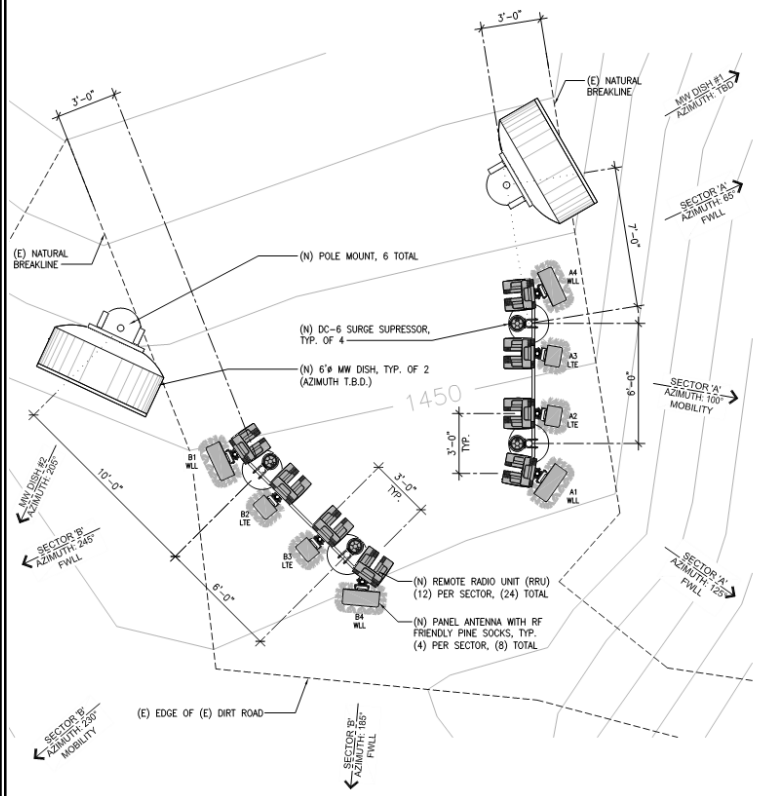
COUNTY OF SAN LUIS OBISPO

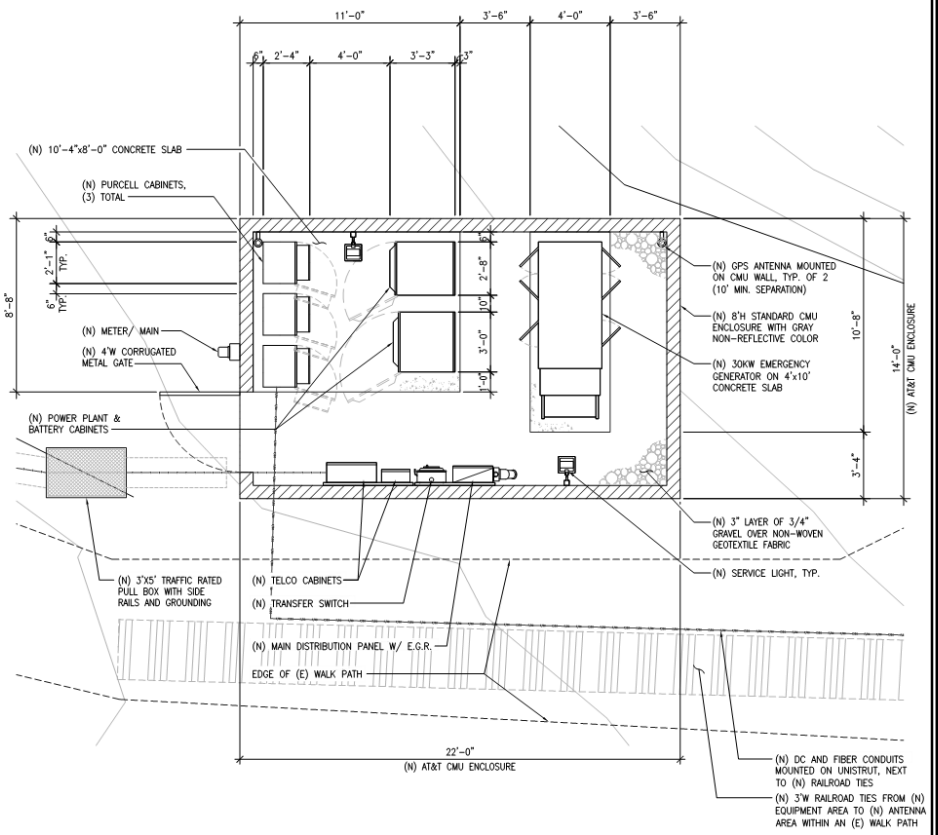
Overall Site Plan
DRC2018-00129



COUNTY OF SAN LUIS OBISPO

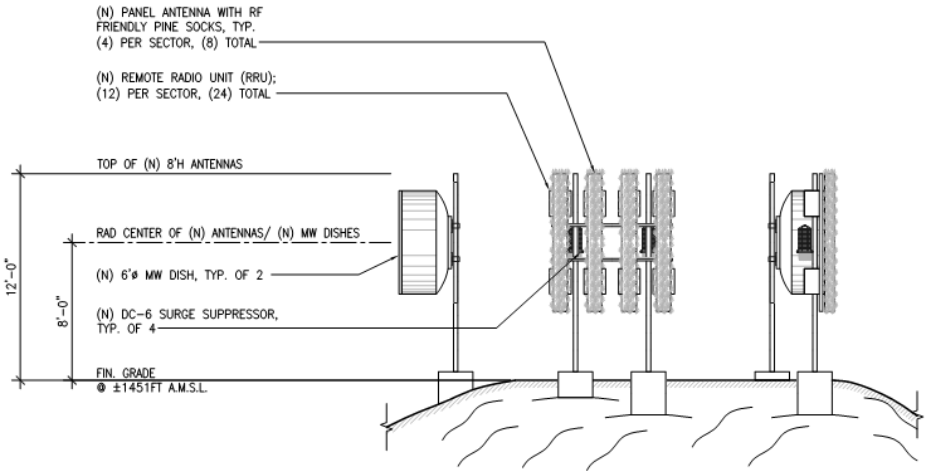
Enlarged Site Plan
DRC2018-00129



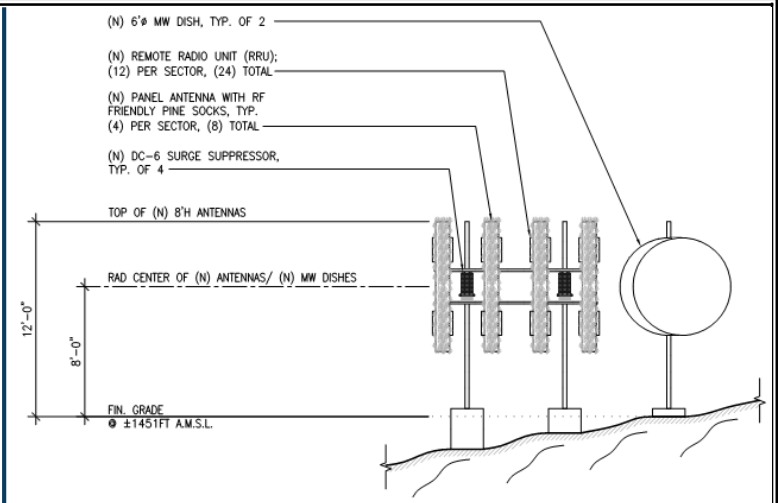


COUNTY OF SAN LUIS OBISPO

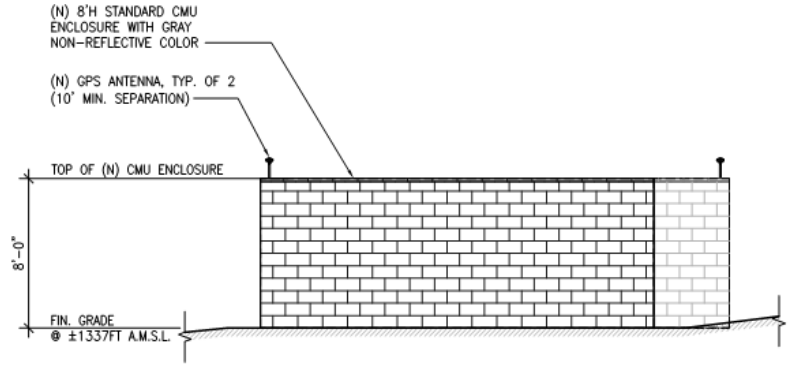
Antenna & Equipment Layout Plan



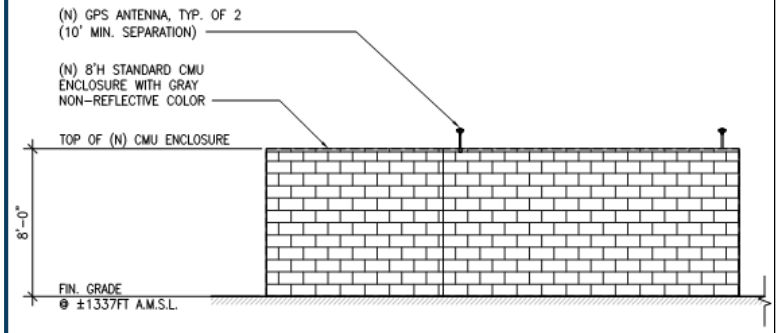
SOUTH ELEVATION @ ANTENNA AREA



EAST ELEVATION @ ANTENNA AREA



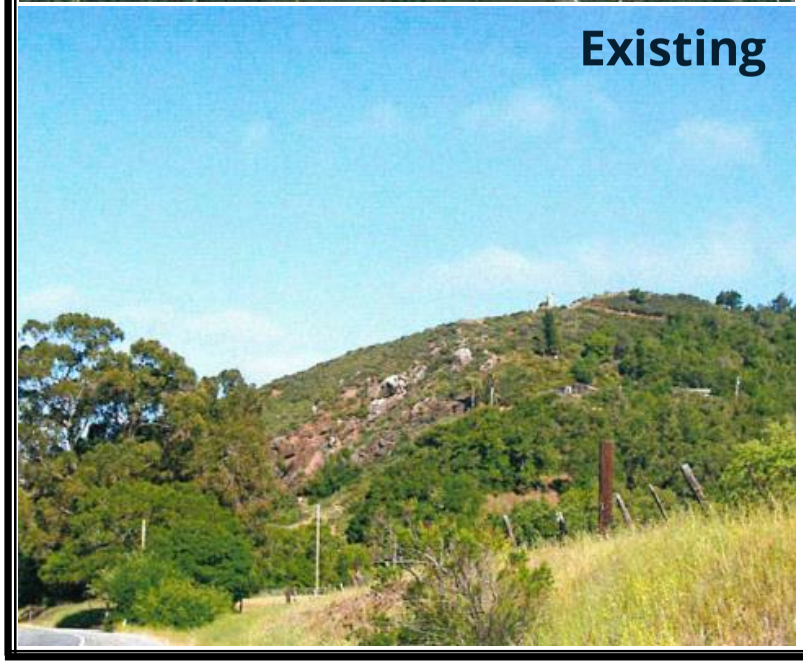
SOUTH ELEVATION @ EQUIPMENT AREA



EAST ELEVATION @ EQUIPMENT AREA

COUNTY OF SAN LUIS OBISPO

South & East Elevations



LOOKING NORTHWEST FROM MORRO ROAD

COUNTY OF SAN LUIS OBISPO

Photo-Simulation

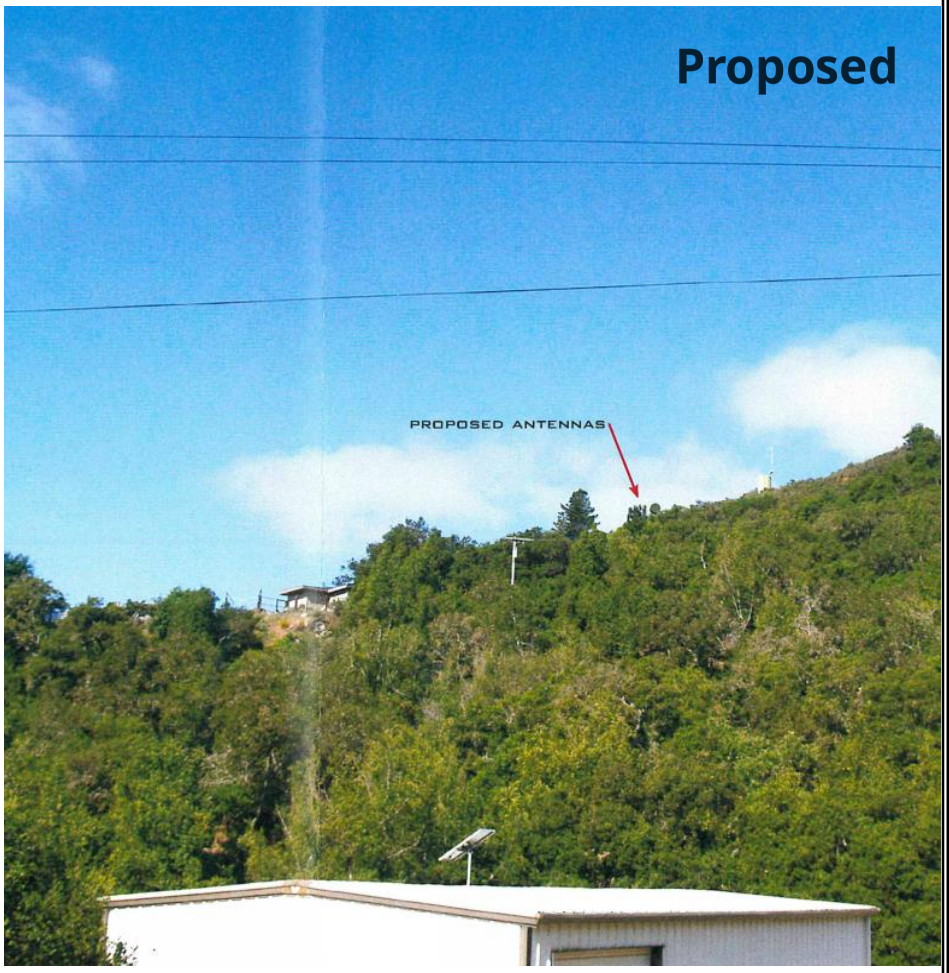
Existing

Proposed

LOOKING NORTHEAST FROM MORRO ROAD

COUNTY OF SAN LUIS OBISPO

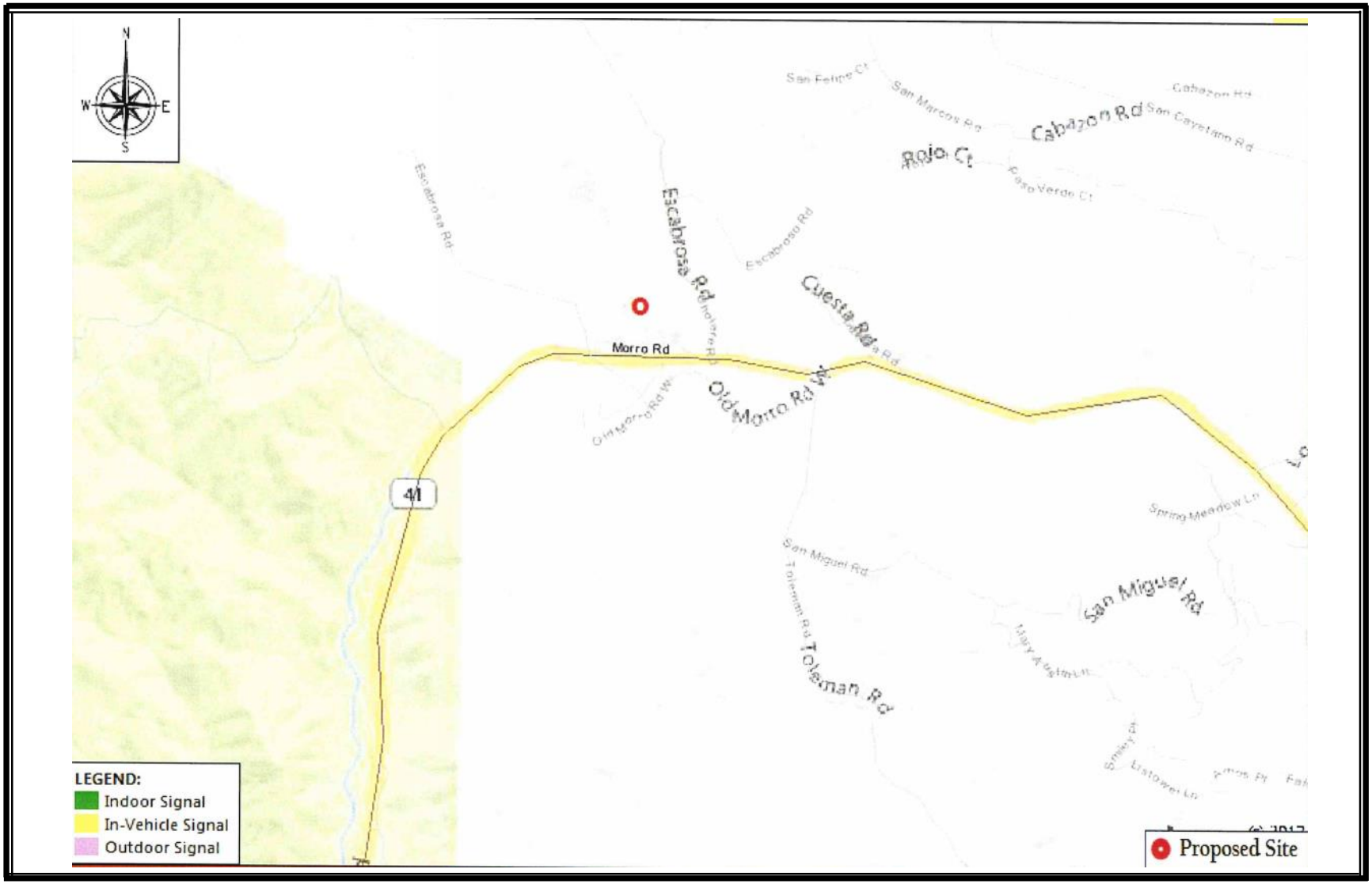
Photo-Simulation



LOOKING SOUTHWEST FROM ESCABROSO ROAD

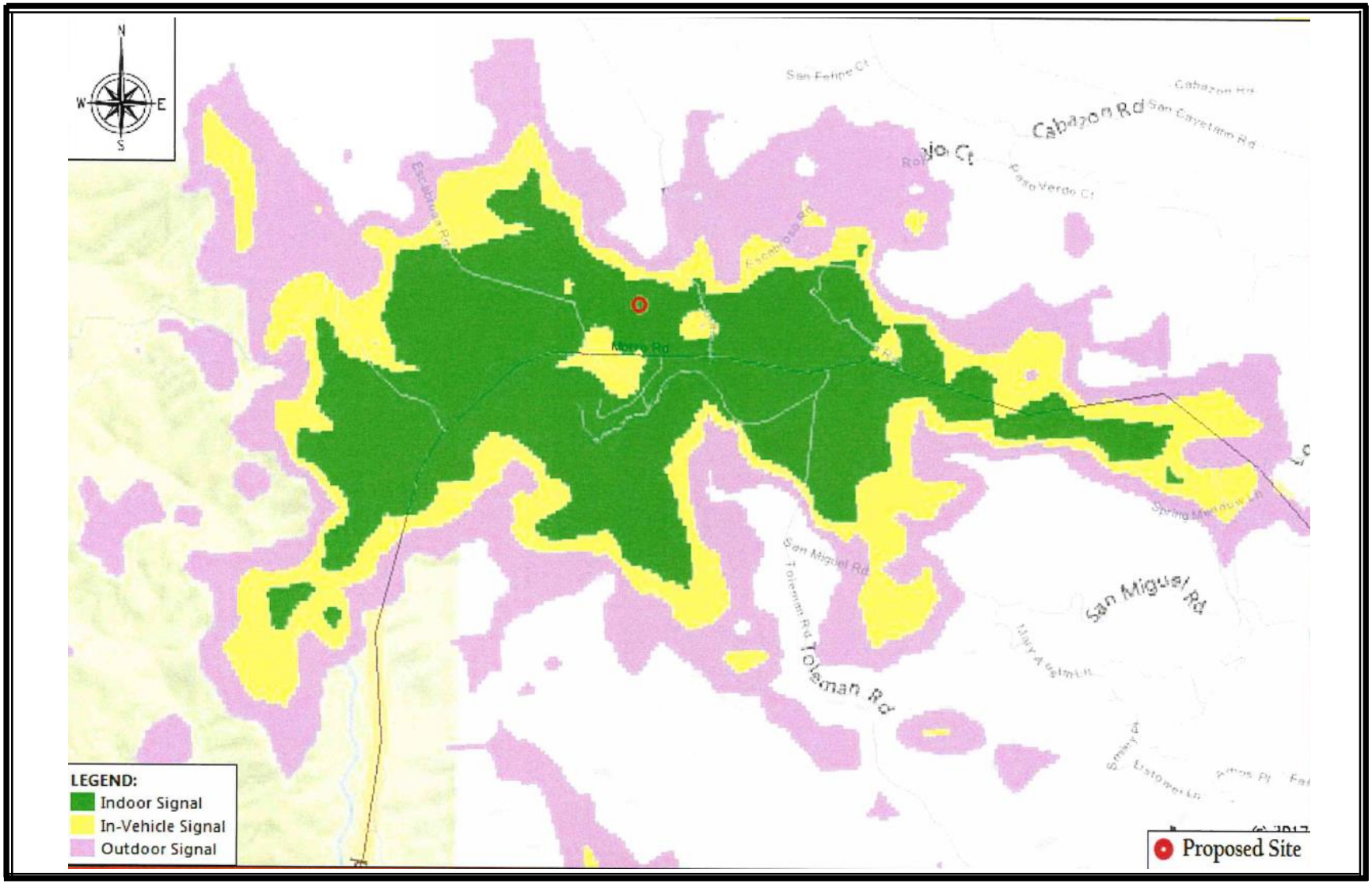
COUNTY OF SAN LUIS OBISPO

Photo-Simulation



COUNTY OF SAN LUIS OBISPO

Propagation Map (Coverage Before)



COUNTY OF SAN LUIS OBISPO

Propagation Map (Coverage After)

COUNTY OF SAN LUIS OBISPO
Department of Public Works
Colt Esenwein, P.E. *Director*

REFERRAL

Date: September 4, 2018

To: Young Choi, Project Planner

Subject: Public Works Project Referral for DRC2018-00129, AT&T MUP, State Route 41, Morro Bay, APN 051-181-010

Thank you for the opportunity to provide information on the proposed subject project. It has been reviewed by several divisions of Public Works, and this represents our consolidated response.

Public Works Comments:

A. The proposed project is within a drainage review area. Drainage plan is required and it will be reviewed at the time of Building Permit submittal by Public Works. The applicant should review Chapter 22.52.110 or 23.05.040 of the Land Use Ordinance prior to future submittal of development permits.

B. This project may be a regulated project as it is located in a Stormwater Management Area and is therefore required to submit a Stormwater Control Plan (SWCP) Application. The Stormwater Control Plan application, SWCP template, and LID Handbook guidance can be found at:

https://www.slocounty.ca.gov/Departments/Planning-Building/Stormwater/Services/Stormwater-Requirements-for-New-Construction.aspx

Recommended Project Conditions of Approval:

Access

1. **On-going condition of approval (valid for the life of the project)**, an encroachment permit must be secured prior to performing any proposed work in the Caltrans right-of-way for State Route 41.
2. **At the time of application for construction permits,** the applicant shall provide evidence to the Department of Planning and Building that onsite circulation and pavement structural sections have been designed and shall be constructed in conformance with Cal Fire, or the regulating fire agency standards and specifications back to the nearest public maintained roadway.

Drainage

3. **At the time of application for construction permits,** the applicant shall submit complete drainage plans for review and approval in accordance with Section 22.52.110 (Drainage) or 23.05.040 (Drainage) of the Land Use Ordinance.
4. **At the time of application for construction permits,** the applicant shall submit complete erosion and sedimentation control plan for review and approval in accordance with 22.52.120.
5. **At the time of application for construction permits,** the applicant shall demonstrate that the project construction plans are in conformance with their Stormwater Control Plan.

Stormwater Control Plan (SWCP):

6. **At the time of application for construction permits**, the applicant shall demonstrate whether the project is subject post-construction stormwater requirements by submitting a Stormwater Control Plan application.
   a. The applicant must submit a Stormwater Control Plan (SWCP) prepared by an appropriately licensed professional to the County for review and approval. Applicants must utilize the County's latest SWCP template.
   b. If applicable, the applicant shall submit a draft stormwater operations and maintenance plan for review by the County. The operations and maintenance plan may be incorporated into existing or proposed CC&Rs or drafted as an Agreement.
   c. If applicable, following approval by the County, the applicant shall record with the County Clerk-Recorder a Stormwater Operations and Maintenance plan to document on-going and permanent storm drainage control, management, treatment, inspection and reporting.
   d. If applicable, the applicant shall submit a draft General Notice to document the location and type of control measures that were installed to mitigate Performance Requirement No. 2. Following approval by the County, the applicant shall record the General Notice with the County Clerk-Recorder. The recorded control measures shall remain in good working order in perpetuity.
7. **Prior to approval of the improvement plans or construction permits**, if necessary, the applicant shall submit a draft Storm Water Operations and Maintenance Plan for all structural post-construction storm water treatment or retention facilities and it must be provided for review.
8. **Prior to approval of the improvement plans or construction permits**, the Stormwater Operations and Maintenance plan and General Notice must be updated to reflect as-built changes, approved by the County, and re-recorded with the County Clerk-Recorder as amendments to the original document.

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