

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 19-018

DATE: February 14, 2019

PROJECT/ENTITLEMENT: AT&T Mobility Conditional Use Permit / DRC2018-00039

APPLICANT NAME:	AT&T Mobility	Email: jambrose@wireless01.com
ADDRESS:	1452 Edinger Avenue, 3rd Floor, Tustin,	, CA 92780
CONTACT PERSON:	Jerry Ambrose	Telephone: (805) 637-7407

PROPOSED USES/INTENT: A request by AT&T Mobility for a Conditional Use Permit (DRC2018-00039) to allow for the construction and operation of a new communications facility (cell site) consisting of twelve (12) panel antennas, thirty-six (36) remote radio units, six (6) suppression units, two (2) microwave dishes, and associated equipment, all installed on a new 80-foot-tall artificial pine tree (monopine), located within a 20-foot by 40-foot lease area, surrounded by 8-foot-tall concrete masonry unit walls. The enclosed lease area also includes a 64-square-foot equipment shelter and a diesel standby emergency generator. The proposed project will result in the disturbance of approximately 2,000 square feet (including utility trenching and access improvements) on an approximate 125-acre parcel. The proposed project is within the Agriculture land use category.

LOCATION: The project is located on the north side of Peachy Canyon Road, approximately 1,250 feet northeast of the Vineyard Drive intersection, approximately 6 miles northwest of the Templeton Urban Reserve Line, 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 <i>Responsible Agency</i> approved/denied the about has made the following determinations regarding	y as 🛛 <i>Lead Agency</i> ove described project on, and 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.					
Cody Scheel (cscheel@	co.slo.ca.us) County of San Luis Obispo				
Signature Name	Date Public Agency				



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 6.1)Using Form Project Title & No. AT&T Mobility Conditional Use Permit ED19-018 (DRC2018-00039)

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)by Schelz/7/19Prepared by (Print)SignatureDate

TERRY WAHLER	Jerus Mahler	Ellen Carroll, Environmental Coordinator	2/7/19
Reviewed by (Print)	Signature	(for)	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 (DRC2018-00039) to allow for the construction and operation of a new communications facility (cell site) consisting of twelve (12) panel antennas, thirty-six (36) remote radio units, six (6) suppression units, two (2) microwave dishes, and associated equipment, all installed on a new 80-foot-tall artificial pine tree (monopine), located within a 20-foot by 40-foot lease area, surrounded by 8-foot-tall concrete masonry unit walls. The enclosed lease area also includes a 64-square-foot equipment shelter and a diesel standby emergency generator. The proposed project will result in the disturbance of approximately 2,000 square feet (including utility trenching and access improvements) on an approximate 125-acre parcel. The proposed project is within the Agriculture land use category and is located on the north side of Peachy Canyon Road, approximately 1,250 feet northeast of the Vineyard Drive intersection, approximately 6 miles northwest of the Templeton Urban Reserve Line. The site is in the Adelaida Sub Area of the North County Planning Area.

ASSESSOR PARCEL NUMBER(S): 039-021-020

Latitude: 35 degrees 35' 7" N Longitude: 120 degrees 49' 2 " W

SUPERVISORIAL DISTRICT # 1

COMM: NA

B. EXISTING SETTING

PLAN AREA: North County SUB: Adelaida

LAND USE CATEGORY: Agriculture

COMB. DESIGNATION: None

PARCEL SIZE: 125 acres

TOPOGRAPHY: Gently rolling to steeply sloping

VEGETATION: Oak woodland, Shrubs, Grasses

EXISTING USES: Undeveloped

SURROUNDING LAND USE CATEGORIES AND USES:

North: Agriculture; agricultural uses	East: Agriculture; vacant
South: Agriculture; residential, agricultural uses	West: Agriculture; residential, agricultural uses

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?		\square		
b)	Introduce a use within a scenic view open to public view?			\bowtie	
c)	Change the visual character of an area?			\square	
d)	Create glare or night lighting, which may affect surrounding areas?			\boxtimes	
e)	Impact unique geological or physical features?			\square	
f)	Other:				

Aesthetics

Setting. The proposed project is located in a rural area of the County on the north side of Peachy Canyon Road, approximately 1,250 feet northeast of the Vineyard Drive intersection, approximately 6 miles northwest of the Templeton Urban Reserve Line. The project site is located approximately 500 feet north of Peachy Canyon Road, on a hilltop at an elevation of approximately 1,388 feet above sea level. The upper approximate 15 to 20 feet of the proposed monopine will be visible from portions of Peachy Canyon Road and Vineyard Drive. No portion of the project will be visible from other public viewing areas.

The surrounding area consists of agriculturally zoned lots and is distinctly rural in character, with a majority of large parcel sizes (a range of approximately 20 to 140 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, grasslands 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, as well as agricultural fields and pastures. The surrounding area is a mix of agriculture uses (mostly row crops, grazing and equestrian facilities) and rural residences. The project property is undeveloped, but includes an existing road that would provide access from Peach Canyon Road up to the hilltop/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 to place a 80 foot tall monopine within a 20 foot x 40 foot lease area, surrounded by 8-foot-tall concrete masonry unit walls. The proposed monopine would support twelve (12) panel antennas, thirty-six (36) remote radio units, six (6) suppression units, two (2) microwave dishes, and associated equipment and hardware. The project also includes a 64-square-foot equipment shelter and a diesel standby emergency generator within the 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 and agricultural landscape. The applicant submitted photo-simulations of the proposed facility from key viewing angles along Peachy Canyon Road and Vineyard Drive. The photo-simulations demonstrate that the site will be visible from views along Peachy Canyon Road and Vineyard Drive. However, since the facility is designed to appear like an artificial pine tree, it would blend with the surrounding landscape (particularly, the existing tree canopy in the immediate vicinity) and would not attract attention. Because of the existing trees and vegetation surrounding the site, 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 (from Vineyard Drive on the left, and Peachy Canyon 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 / agricultural landscape, the proposed project is a stealth design that would blend with existing natural features of the landscape (particularly, the existing tree canopy in the immediate vicinity). This use of the natural features and topography will preserve and protect such features through the 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 pine tree structure, with an organic and asymmetrical form and realistic bark texture and foliage colors. In addition, the applicant is required to submit material and color test samples of all visual elements of the monopine. 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.

SOURCES	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
land, per non-			\square	
Inique Statewide ural use?			\square	
ther property other uses?			\boxtimes	
ng for son Act			\boxtimes	
	SOURCES land, per non- inique tatewide ural use? other property other uses? of for son Act	SOURCES Potentially Significant land, per	SOURCES Potentially Significant Impact can & will be mitigated Iand, per o non- Impact can & will be mitigated Inique o non- Impact can & will be mitigated Iniqu	SOURCES Potentially Significant Impact can & will be mitigated Insignificant Impact Iand, per o non- Impact Impact Insignificant Impact Impact Innon- Impact Impact

Agricultural Resources

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

Land Use Category:	Agriculture		Historic/Existing	Commerc	ial Crop	<u>s</u> : Dry farming
State Classification: Farmland if irrigated	Not prime farmland and	Prime	In Agricultural F Preserve	Preserve?	Yes; T	empleton AG

Under Williamson Act contract? Yes

The proposed project is located within the Agriculture land use category on a 125-acre parcel. It appears that approximately 35 acres of flatter areas of the site located in the lower elevations are used for dry farming. The nearest existing limits of dry farming are located approximately 200 feet to the southeast of the immediate project site, which is located on a hilltop surrounded by existing oak trees and shrubs.



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

Linne-Calodo complex (9 - 30 % slope).

<u>Linne</u>. This moderately sloping soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class IV without irrigation and Class IV when irrigated.

<u>Calodo</u>. This moderately sloping soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class IV without irrigation and Class IV when irrigated.

Linne-Calodo complex (50 - 75 % slope).

<u>Linne</u>. This very steeply sloping soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

<u>Calodo</u>. This very steeply sloping soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: steep slopes, shallow depth to bedrock, slow percolation. The soil is considered Class VII without irrigation and Class is not rated when irrigated.

<u>Rincon clay loam</u> (2 - 9% slope). This gently sloping, fine loamy bottom soil is considered not well drained. The soil has moderate erodibility and moderate shrink-swell characteristics, as well as having potential septic system constraints due to: slow percolation. The soil is considered Class IV without irrigation and Class II when irrigated.

Impact. The project involves approximately 2,000 square feet of disturbance to construct an unmanned wireless communications facility on an existing parcel in the Agriculture land use category. Although the project site has a small swath of Prime farmland (when irrigated) located at the southern boundary of the site, the project would be located on a hilltop and would not require the removal of any trees, existing dry farmed areas, or Prime farmland. The project was referred to the Agriculture Department on April 12, 2018, and no comments were received in response. The proposed facility would be unmanned and, once constructed, would generate about one vehicle trip every four to six weeks for routine maintenance. This traffic would not impact the existing dry farming operations. The subject property is under a land conservation contract. Table 2 of the County's Rules of Procedure to Implement the Land Conservation Act of 1965 list "Communications Facilities" as compatible uses for lands subject to conservation contracts. No conflicts with the Land Conservation Contract or the Williamson Act are anticipated.

Mitigation/Conclusion. No significant impacts to agriculture are anticipated, and therefore no mitigation measures are necessary.

- 3. AIR QUALITY *Will the project:*
- a) Violate any state or federal ambient air quality standard, or exceed air quality emission thresholds as established by County Air Pollution Control District?

Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
		\square	



3.	AIR QUALITY Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
b)	Expose any sensitive receptor to substantial air pollutant concentrations?			\square	
c)	Create or subject individuals to objectionable odors?			\square	
d)	Be inconsistent with the District's Clean Air Plan?			\square	
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?				
GF f)	REENHOUSE GASES Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			\square	
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 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 2,000 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?			\square	
b)	Reduce the extent, diversity or quality of native or other important vegetation?			\square	
c)	Impact wetland or riparian habitat?			\boxtimes	
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, grasslands and herbaceous plant life

Name and distance from blue line creek(s): Summit Creek, approximately 2,000 feet to the east

Habitat(s): Coastal Live Oak Woodland

Site's tree canopy coverage: Approximately 55%

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

Wildlife Species:

Coast Range newt (Taricha torosa)

Coast Range newt has been found approximately one-half mile to the northeast. 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.

Impact. The proposal involves constructing a monopine and associated ground equipment within a lease area of approximately 800-square-feet, and associated trenching. The project lease area is vegetated with ruderal grasses and is surrounded by oak trees. There are no trees located directly within the footprint of the proposed lease area, and the existing access road will not require removal of existing trees. 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?			\boxtimes	
b)	Disturb historical resources?			\boxtimes	
c)	Disturb paleontological resources?			\boxtimes	
d)	Cause a substantial adverse change to a Tribal Cultural Resource?			\square	
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 April 12, 2018. Comments were received from the Northern Chumash Tribal Council on June 8, 2018, requesting that a Phase I surface survey be conducted for the project. 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. A Phase I surface survey was conducted (Helix Environmental Planning, Inc., October 26, 2018), and concluded that no evidence of cultural materials was noted on the property, and therefore cultural resources will not be affected by the project. 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.

County of San Luis Obispo, Initial Study

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

* Per Division of Mines and Geology Special Publication #42

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

Topography: Gently rolling to steeply sloping

Within County's Geologic Study Area?: No

Landslide Risk Potential: Low to moderate

Liquefaction Potential: Low

Nearby potentially active faults?: No Distance? Not applicable

Area known to contain serpentine or ultramafic rock or soils?: No

Shrink/Swell potential of soil: Moderate

Other notable geologic features? None

Geology and Soils

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. As proposed, the project will result in the disturbance of approximately 2,000 square feet. No significant impacts are expected to occur.



Mitigation/Conclusion. 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?			\square	
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?				\boxtimes
e)	Impair implementation or physically interfere with an adopted emergency response or evacuation plan?			\boxtimes	
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?				\square
g)	Increase fire hazard risk or expose people or structures to high wildland fire hazard conditions?			\boxtimes	
h)	Be within a 'very high' fire hazard severity zone?				\boxtimes
i)	Be within an area classified as a 'state responsibility' area as defined by CalFire?			\boxtimes	
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 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 26, 2018), the maximum level of RF emissions from the proposed facility at ground-level would be equivalent to 5.3 percent of the applicable public exposure limit. These results include several "work-case" assumptions and therefore are expected to overstate actual power density levels.

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?			\boxtimes	
b)	<i>Generate permanent increases in the ambient noise levels in the project vicinity?</i>			\boxtimes	
c)	Cause a temporary or periodic increase in ambient noise in the project vicinity?			\boxtimes	
d)	Expose people to severe noise or vibration?			\boxtimes	
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?				\boxtimes
f)	Other:				



Noise

Setting. 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 700 feet to the south.

Impact. The proposed project would introduce noise generating equipment into a relatively quiet 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 are either directly (e.g., construct new homes or businesses) or indirectly (e.g., extension of major infrastructure)?	ea 🗌			
 b) Displace existing housing or peop requiring construction of replacent housing elsewhere? 	le, nent			\square
c) Create the need for substantial new housing in the area?	N		\boxtimes	
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.

И re S

PUBLIC SERVICES/UTILITIESWill the project have an effect upon, or esult in the need for new or altered public ervices in any of the following areas:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
Fire protection?			\square	
Police protection (e.g., Sheriff, CHP)?			\boxtimes	
Schools?			\boxtimes	
Roads?			\boxtimes	
Solid Wastes?			\boxtimes	
Other public facilities?			\boxtimes	
Other:				

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

Police: County Sheriff	Location: Templeton (Approximately 8 miles to the southeast)					
Fire: Cal Fire (formerly CDF)	Hazard Severity: High	Response Time: 10-15 minutes				
Location: Approximately 7.04 miles to the Paso Robles Fire Station (30).						
School District: Templeton Unified School District.						

Public Services

a)

b)

C)

d)

e)

f)

g)

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. The project will be reviewed again at the time of building permit submittal to ensure that all State and local fire safety regulations are complied with.

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 <i>Will the project:</i>	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
a)	Increase the use or demand for parks or other recreation opportunities?			\square	



11.	RECREATION Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
b)	Affect the access to trails, parks or other recreation opportunities?			\boxtimes	
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?			\boxtimes	
b) Reduce existing "Level of Service" on public roadway(s)?			\bowtie	
c) Create unsafe conditions on public roadways (e.g., limited access, design features, sight distance, slow vehicles)?			\square	
d) Provide for adequate emergency access?			\boxtimes	
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?			\boxtimes	
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?				

12. TRANSPORTATION/CIRCULATION Will the project:	Potentially Significant	Impact can & will be mitigated	Insignificant Impact	Not Applicable
 h) Result in a change in air traffic patterns that may result in substantial safety risks? 			\boxtimes	
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 (Peachy Canyon Road and Vineyard Drive) 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?			\square	
 b) Change the quality of surface or groun water (e.g., nitrogen-loading, day- lighting)? 	d 🗌		\square	
c) Adversely affect community wastewate service provider?	er 🗌		\boxtimes	
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
QL	JALITY			\square	
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.)?			\square	
c)	Change the quality of groundwater (e.g., saltwater intrusion, nitrogen-loading, etc.)?			\square	
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?			\square	
e)	Change rates of soil absorption, or amount or direction of surface runoff?			\boxtimes	
f)	Change the drainage patterns where substantial on- or off-site sedimentation/ erosion or flooding may occur?			\boxtimes	
g)	Involve activities within the 100-year flood zone?			\boxtimes	
QL	JANTITY			_	
h)	Change the quantity or movement of available surface or ground water?				
i)	Adversely affect community water service provider?			\boxtimes	
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?			\boxtimes	
k)	Other:				

Water

Setting. The proposed unmanned wireless communications facility does not propose any water usage.

The topography of the project is gently rolling to steeply sloping. The closest creek from the proposed development is approximately 2,000 feet to the east, on the eastern side of Peachy Canyon Road. As described in the NRCS Soil Survey, the soil surface is considered to have moderate erodibility.

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

Within the 100-year Flood Hazard designation? No

Closest creek? Summit Creek Distance? Approximately 2,000 feet



Soil drainage characteristics: Very poorly drained to not well 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: Moderate

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

Impact – Water Quality/Hydrology

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

- ✓ Approximately 2,000 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?				

15.	LAND USE Will the project:	Inconsistent	Potentially Inconsistent	Consistent	Not Applicable
b) I I	Be potentially inconsistent with any habitat or community conservation plan?			\boxtimes	
c) [é	Be potentially inconsistent with adopted agency environmental plans or policies with jurisdiction over the project?			\boxtimes	
d) [Be potentially incompatible with surrounding land uses?			\boxtimes	
e) (Other:				

Land Use

Setting/Impact. Surrounding land 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.). It was determined that the Adelaida Sub-Area (LUO Section 22.94.030) planning area standards do not apply to this project.

Referrals were sent to outside agencies to review for policy consistencies (e.g., CAL FIRE for Fire Code, Agricultural Commissioner for agricultural impacts, etc.). The project was found to be consistent with these documents (refer also to Exhibit A on reference documents used).

Although the proposed communications facility is not a use that is inherently compatible with the visual character of the surrounding residential and 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 "<u>www.sloplanning.org</u>" under "Environmental Information", or the California Environmental Resources Evaluation System at: <u>http://resources.ca.gov/ceqa/</u> 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 \boxtimes) and when a response was made, it is either attached or in the application file:

Contacted	Agency	<u>Response</u>
\boxtimes	County Public Works Department	None
	County Environmental Health Services	Not Applicable
\boxtimes	County Agricultural Commissioner's Office	None
	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
\square	CA Department of Forestry (Cal Fire)	None
	CA Department of Transportation	Not Applicable
	Community Services District	Not Applicable
	Other	Not Applicable
	Other	Not Applicable
** "∧	lo comment" or "No concerns"-type responses are us	sually not attached

The following checked (" \boxtimes ") 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 <u>nty documents</u> 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/Adelaida Sub Area	Design Plan Specific Plan Annual Resource Summary Report Circulation Study er 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
and Update EIR	



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 26, 2018 Graphic Detail Productions, *Photo-Simulations*, January 29, 2018 Helix Environmental Planning, *Cultural Resources Survey*, October 26, 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. At the time of application for construction permits, the construction drawings shall reflect the following specifications:
 - a. The monopine shall be designed and constructed to appear as an organic, non-symmetrical form, with varying branch lengths and shapes and "needle" clusters installed in random, seemingly natural-occurring patterns. The branches lengths shall taper up the monopine "trunk" and the longest (lowest) branches shall begin at an elevation no higher than 15 feet above the base of the trunk. Overall branch count density shall be equivalent to at least three branches per foot. Realistic bark texture shall run the entire length of the tree pole.
 - b. The monopine "needles" shall not be all one color. Varying shades of hues shall be used appropriately to replicate a living plant. Monopine colors shall be field matched with the existing on-site mature pine trees.
 - c. Plans, specifications and estimates shall require the submittal of material and color test samples of all visible elements of the monopine to the County Department of Planning and Building for review and approval. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the test samples prior to preparation of the final plans.
 - d. Antennas shall be hidden and not extend beyond the ends of the artificial branches. Antennas and associated support arms and hardware shall be textured and or colored to blend with the monopine branches and needles.
- VR-2. At the time of application for construction permits, the applicant shall submit accurate, scaled engineering and architectural drawings of the monopine for the construction permit(s). Plans shall not include generic illustrations of a monopine. The drawings shall include elevations and plan views. The construction plans and specifications shall be consistent with the plans approved with the land use permit.
- VR-3. Prior to issuance of a construction permit, the applicant shall submit material and color test samples of all visible elements of the monopine to the County Department of Planning and Building for review and approval. This submittal shall include both photographs of actual existing monopine trees constructed by the selected vendor, as well as physical samples of the faux foliage and branch materials to be used. The faux pine tree shall be constructed of the highest quality, most durable and realistic appearing faux foliage and branches. The color of the faux foliage shall be field matched with the existing trees on site.

DEVELOPER'S STATEMENT FOR AT&T MOBILITY CONDITIONAL USE PERMIT DRC2018-00039

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

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

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

Aesthetics (Visual Resources)

- VR-1. At the time of application for construction permits, the construction drawings shall reflect the following specifications:
 - a. The monopine shall be designed and constructed to appear as an organic, nonsymmetrical form, with varying branch lengths and shapes and "needle" clusters installed in random, seemingly natural-occurring patterns. The branches lengths shall taper up the monopine "trunk" and the longest (lowest) branches shall begin at an elevation no higher than 15 feet above the base of the trunk. Overall branch count density shall be equivalent to at least three branches per foot. Realistic bark texture shall run the entire length of the tree pole.
 - b. The monopine "needles" shall not be all one color. Varying shades of hues shall be used appropriately to replicate a living plant. Monopine colors shall be field matched with the existing on-site mature pine trees.
 - c. Plans, specifications and estimates shall require the submittal of material and color test samples of all visible elements of the monopine to the County Department of Planning and Building for review and approval. The plans, specifications and estimates and construction schedule shall provide for revisions and corrections to the test samples prior to preparation of the final plans.
 - d. Antennas shall be hidden and not extend beyond the ends of the artificial branches. Antennas and associated support arms and hardware shall be textured and or colored to blend with the monopine branches and needles.
- VR-2. At the time of application for construction permits, the applicant shall submit accurate, scaled engineering and architectural drawings of the monopine for the construction permit(s). Plans shall not include generic illustrations of a monopine. The drawings shall include elevations and plan views. The construction plans and specifications shall be consistent with the plans approved with the land use permit.
- VR-3. Prior to issuance of a construction permit, the applicant shall submit material and color test samples of all visible elements of the monopine to the County Department of Planning and Building for review and approval. This submittal shall include both

photographs of actual existing monopine trees constructed by the selected vendor, as well as physical samples of the faux foliage and branch materials to be used. The faux pine tree shall be constructed of the highest quality, most durable and realistic appearing faux foliage and branches. The color of the faux foliage shall be field matched with the existing pine trees on site.

Monitoring: (Visual Recourse Measures VR-1 to VR-3) 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

Date

Signature of Agent(s)

~ S. Hollihas

Name (Print)

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

Site Name: CSL02696 FA#: 13790071 USID: 196426 Site ID: CSL02696 Address: 7250 Vineyard Drive Paso Robles, California 93446 County: San Luis Obispo Latitude: 35.595507 Longitude: -120.820554 M-RFSC Name: Essie Polard Site Structure Type: Monotree PACE#: MRLOS047055, MRLOS050947, MRLOS050956, MRLOS032204 Prepared For: AT&T Mobility, LLC 12312 W Olympic Blvd Los Angeles, California, 90064-1033



Report Information:

Report Writer: Adam Piombino Report Date: October 26, 2018

CDs: CSL02696 - 100ZD - REV 0 - WLL - 03-14-18 RFDS: CSL02696_2018-New-Site_FWLL-1C_hs091n_3551A0EZAR_13790071_196426_12-07-2017_Final-Approved_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.



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I.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 CSL02696 located at 7250 Vineyard Drive in Paso Robles, 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.

I.I 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 monotree or areas associated with the active antenna installation be restricted and secured where possible.
 - Yellow CAUTION 2B sign posted at the base of the monopole.
- Signage at AT&T Mobility Sectors:
 - A: No Action Required
 - B: No Action Required
 - C: No Action Required
- Barriers at AT&T Mobility Sectors:
 - **A: N/A**
 - o **B: N/A**
 - **C: N/A**

Predictive Modeling Results:

The maximum predictive power density generated by the antennas is approximately 5.30 percent of the FCC's general public limit (1.06 percent of the FCC's occupational limit) at the ground.

2.0 SIGNAGE AND MITIGATION PLAN



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)
ΑΤΤ ΑΙ	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R- BUU-H6	130	6.0 28		33	28	68.0
ATT A2	AT&T	Panel	LTE 700	2	2276.05	13.45	Kathrein 800- 10966K	100	8.0	66	33	31	67.0
ATT A2	AT&T	Panel	LTE 850	2	2631.37	14.15	Kathrein 800- 10966K	100	8.0	65	33	31	67.0
ATT A2	AT&T	Panel	LTE 1900	4	5071.31	15.75	Kathrein 800- 10966K	100	8.0	64	33	31	67.0
ATT A3	AT&T	Panel	LTE 700	4	2148.42	11.95	Quintel QS8658-7	100	8.0	68	34	34	67.0
ATT A3	AT&T	Panel	LTE 2100	4	4416.92	15.15	Quintel QS8658-7	100	8.0	61	34	34	67.0
ATT A4	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R- BUU-H6	70	6.0	28	35	38	68.0
ATT BI	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R- BUU-H6	250	6.0	28	20	33	68.0
ATT B2	AT&T	Panel	LTE 700	2	2276.05	I 3.45	Kathrein 800- 10966K	220	8.0	66	23	30	67.0
ATT B2	AT&T	Panel	LTE 850	2	2631.37	14.15	Kathrein 800- 10966K	220	8.0	65	23	30	67.0
ATT B2	AT&T	Panel	LTE 1900	4	5071.31	15.75	Kathrein 800- 10966K	220	8.0	64	23	30	67.0
АТТ ВЗ	AT&T	Panel	LTE 700	4	2148.42	11.95	Quintel QS8658-7	220	8.0	68	25	38	67.0
АТТ ВЗ	AT&T	Panel	LTE 2100	4	4416.92	15.15	Quintel QS8658-7	220	8.0	61	25	38	67.0
ATT B4	AT&T	Panel	LTE 2300	4	5260.17	17.95	CCI HPA-33R- BUU-H6	190	6.0	28	28	26	68.0
ATT CI	AT&T	Panel	LTE 2300	4	2890.68	15.35	Quintel QS8658-3e	340	8.0	60	30	41	67.0
ATT C2	AT&T	Panel	LTE 700	2	2276.05	13.45	Kathrein 800- 10966K	330	8.0	66	27	40	67.0
ATT C2	AT&T	Panel	LTE 850	2	2631.37	14.15	Kathrein 800- 10966K	330	8.0	65	27	40	67.0

4

Site Name: CSL02696 Site FA: 13790071

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 C2	AT&T	Panel	LTE 1900	4	5071.31	15.75	Kathrein 800- 10966K	330	8.0	64	27	40	67.0
ATT C3	AT&T	Panel	LTE 700	2	1321.57	12.85	Quintel QS8658-3e	330	8.0	64	24	39	67.0
ATT C3	AT&T	Panel	LTE 2100	4	4625.09	15.35	Quintel QS8658-3e	330	8.0	63	24	39	67.0
ATT C4	AT&T	Panel	LTE 700	4	2148.42	11.95	Quintel QS8658-7	330	8.0	68	21	38	67.0

• Note there are 4 AT&T antennas per sector at this site. For clarity, the different frequencies for each antenna are entered on separate lines.

• Note that the microwaves were not included in the predictive modeling analysis because microwaves onsite are considered compliant. 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 are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled exposures on any accessible ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

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 5.30 percent of the FCC's general public limit (1.06 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 5.30 percent of the FCC's general public limit (1.06 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. All microwaves on site are considered compliant with AT&T's guidance and were not included in the modeling analysis.

• AT&T Antennas

EBI Project Number: 6218006852





Max MPE: 5.3% General Population MPE at Ground Level



Site Name: CSL02696 Site FA: 13790071

• AT&T Antennas









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 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**

StartMapDef	inition																			
						Number														
Roof Max Y	Roof Max X	Map Max Y	Map Max X	Y Offset	X Offset	of Areas	Envelope											List Of Ar	eas	
120	100	150	120	20	20) 1	\$AE\$81:\$DZ	\$AE\$81:\$I	DZ\$200									\$AE\$81:\$	DZ\$200	
StartSettings	Data																			
Standard	Method	Uptime	Scale Factor	Low Thr	Low Color	Mid Thr	Mid Color	Hi Thr	Hi Color	Over Color	Ap Ht Mult	Ap Ht Me	thod							
4	2	1	. 1	100) 1	500) 4	5000	2	3	1.5	5 1								
StartAntenna	Data	It is advisabl	e to provide ar	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	Туре	Loss	Power	Power	Mfg	Model	х	Υ	Z	Туре	Aper	Gain	Pt Dir	Profile	flag
ATT A1	LTE	2300	25	4	10) 1/2 LDF	0.5		84.33348	CCI	HPA-33R-BUU-H6	33	2	.8 67.98		6.04	17.95	28;130		ON•
ATT A2	LTE	700	60	2	10) 1/2 LDF	0.5		102.8445	Kathrein	800-10966K	33	8	1 67		8	13.45	66;100		ON•
ATT A2	LTE	850	60	2	10) 1/2 LDF	0.5		101.2002	Kathrein	800-10966K	33	3	1 67		8	14.15	65;100		ON•
ATT A2	LTE	1900	40	4	10) 1/2 LDF	0.5		134.9336	Kathrein	800-10966K	33	8	1 67		8	15.75	64;100		ON•
ATT A3	LTE	700	40	4	10) 1/2 LDF	0.5		137.1261	Quintel	QS8658-7	34	. 3	4 67		8	11.95	68;100		ON•
ATT A3	LTE	2100	40	4	10) 1/2 LDF	0.5		134.9336	Quintel	QS8658-7	34	. 3	4 67		8	15.15	61;100		ON•
ATT A4	LTE	2300	25	4	10) 1/2 LDF	0.5		84.33348	CCI	HPA-33R-BUU-H6	35	6 8	8 67.98		6.04	17.95	28;70		ON•
ATT B1	LTE	2300	25	4	10) 1/2 LDF	0.5		84.33348	CCI	HPA-33R-BUU-H6	20) 3	3 67.98		6.04	17.95	28;250		ON•
ATT B2	LTE	700	60	2	10) 1/2 LDF	0.5		102.8445	Kathrein	800-10966K	23	3	0 67		8	13.45	66;220		ON•
ATT B2	LTE	850	60	2	10) 1/2 LDF	0.5		101.2002	Kathrein	800-10966K	23	3	0 67		8	14.15	65;220		ON•
ATT B2	LTE	1900	40	4	10) 1/2 LDF	0.5		134.9336	Kathrein	800-10966K	23	8	0 67		8	15.75	64;220		ON•
ATT B3	LTE	700	40	4	10	1/2 LDF	0.5		137.1261	Quintel	QS8658-7	25	3	8 67		8	11.95	68;220		ON•
ATT B3	LTE	2100	40	4	10) 1/2 LDF	0.5		134.9336	Quintel	QS8658-7	25	8	8 67		8	15.15	61;220		ON•
ATT B4	LTE	2300	25	4	10	1/2 LDF	0.5		84.33348	CCI	HPA-33R-BUU-H6	28	2	6 67.98		6.04	17.95	28;190		ON•
ATT C1	LTE	2300	25	4	10) 1/2 LDF	0.5		84.33348	Quintel	QS8658-3e	30	4	1 67		8	15.35	60;340		ON•
ATT C2	LTE	700	60	2	10) 1/2 LDF	0.5		102.8445	Kathrein	800-10966K	27	·	0 67		8	13.45	66;330		ON•
ATT C2	LTE	850	60	2	10) 1/2 LDF	0.5		101.2002	Kathrein	800-10966K	27	·	0 67		8	14.15	65;330		ON•
ATT C2	LTE	1900	40	4	10) 1/2 LDF	0.5		134.9336	Kathrein	800-10966K	27	·	0 67		8	15.75	64;330		ON•
ATT C3	LTE	700	40	2	10) 1/2 LDF	0.5		68.56303	Quintel	QS8658-3e	24	. 3	9 67		8	12.85	64;330		ON•
ATT C3	LTE	2100	40	4	10) 1/2 LDF	0.5		134.9336	Quintel	QS8658-3e	24	4 8	9 67		8	15.35	63;330		ON•
ATT C4	LTE	700	40	4	10) 1/2 LDF	0.5		137.1261	Quintel	QS8658-7	21	. 3	8 67		8	11.95	68;330		ON•
StartSymbol	Data																			
Sym	Map Marker	Roof X	Roof Y	Map Label	Description (notes for	this table only	()												
Sym		5	35	AC Unit	Sample symb	ols														_
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 monotree or areas associated with the active antenna installation be restricted and secured where possible.
 - Yellow CAUTION 2B sign posted at the base of the monopole.

• AT&T Mobility Sectors:

- Sector A:
 - No Action Required
- Sector B:
 - No Action Required
- Sector C:
 - No Action Required

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 I and Figure I (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 (cm²). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm²) 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/cm² and an uncontrolled MPE limit of 0.57 mW/cm². For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE limit is 2.33 mW/cm² and an uncontrolled MPE limit is 2.33 mW/cm² and an uncontrolled MPE limit of 0.47 mW/cm². 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/cm²)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								

Т	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/cm²)Averaging Tim [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/cm²)Averaging T [E]², [H]², (minute)												
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	300-1,500 f/1,500 30											
1,500-100,000			1.0	30								
$f = \Gamma_{MA} = \dots = \dots = \dots : \dots : (M[1])$	_\											

f = Frequency in (MHz)

* Plane-wave equivalent power density





Plane-wave Equivalent Power Density

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	I.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:

- I. 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 <u>aware</u> of the potential risks <u>prior</u> to entering the affected area.

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



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.

Adam Piontino



Vicinity Map DRC2018-00039





Land Use Category Map DRC2018-00039





Aerial – Overall Site DRC2018-00039





Aerial – Site Enlarged DRC2018-00039





Overall Site Plan DRC2018-00039











Lease Area, Antenna & Equipment Layout Plan













Propagation Map (Coverage Before)





Propagation Map (Coverage After)

