NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

Notice is hereby given that, as Lead Agency, the City of Roseville, Development Services Department, Planning Division has prepared an Initial Study leading to a Mitigated Negative Declaration for the project referenced below. This Mitigated Negative Declaration is available for public review and comment.

Project Title/File#: INFILL PCL 178 – Verizon Riverside Monopine; PL#19-0040

Project Location: 900 Riverside Ave.; APN 472-170-035-000

Project Owner: BMP II LLC

Project Applicant: Celeste Magennis, Epic Wireless

Project Planner: Shelby Vockel, Associate Planner

Project Description: The project includes a Conditional Use Permit to construct a new 68-foot-tall monopine telecommunications facility. The tower will be located within a 30'x20' lease area with outdoor equipment, on a 4'x15' concrete slab. The lease area will be enclosed with a six-foot-tall chain link fence with privacy slats.

Document Review and Availability: The public review and comment period begins on **July 26, 2019** and ends on **August 15, 2019.** The Mitigated Negative Declaration may be reviewed during normal business hours (8:00 am to 5:00 pm) at the Planning Division offices, located at 311 Vernon Street. It may also be viewed online at:

https://www.roseville.ca.us/cms/One.aspx?portalId=7964922&pageId=8774505

Written comments on the adequacy of the Mitigated Negative Declaration may be submitted to Shelby Vockel, Planning Division, 311 Vernon Street, Roseville, CA 95678, and must be received no later than 5:00 pm on August 15, 2019.

This project will be scheduled for a public hearing before the City's Planning Commission. At this hearing, the Planning Commission will consider the Mitigated Negative Declaration and associated project entitlements. The tentative hearing date is August 22, 2019.

Mike Isom
Development Services Director

Dated: July 25, 2019

Publish: July 26, 2019

CITY OF ROSEVILLE CALIFORNIA

DEVELOPMENT SERVICES DEPARTMENT – PLANNING DIVISION

311 Vernon Street, Roseville, CA 95678 (916) 774-5276

MITIGATED NEGATIVE DECLARATION

Project Title/File Number:	INFILL PCL 178 – Verizon Riverside Monopine; File # PL19-0040
Project Location:	900 Riverside Ave., Roseville, Placer County; 472-170-035-000
Project Applicant:	Celeste Magennis – Epic Wireless - 605 Coolidge Dr. Suite 100, Folsom, CA 95630 – (530) 417-1883
Property Owner:	BMP II LLC – 8636 Antelope North Rd., Antelope, CA 95843
Lead Agency Contact Person:	Shelby Vockel, Associate Planner – City of Roseville, 311 Vernon St., Roseville, CA 95678 – (916)746-1347
Date:	July 26, 2019

Project Description:

The project includes a Conditional Use Permit to construct a new 68-foot-tall monopine telecommunications facility. The tower will be located within a 30'x20' lease area with outdoor equipment, on a 4'x15' concrete slab. The lease area will be enclosed with a six-foot-tall chain link fence with privacy slats.

DECLARATION

The Planning Manager has determined that the above project will not have significant effects on the environment and therefore does not require preparation of an Environmental Impact Report. The determination is based on the attached initial study and the following findings:

A. The project will not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species, reduce the number or restrict the range of rare or endangered plants or animals or eliminate important examples of the major periods of California history or prehistory.

B. The project will not have the potential to achieve short-term, to the disadvantage of long-term, environmental goals.

C. The project will not have impacts, which are individually limited, but cumulatively considerable.

D. The project will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

E. No substantial evidence exists that the project may have a significant effect on the environment.

F. The project incorporates all applicable mitigation measures identified in the attached initial study.

G. This Mitigated Negative Declaration reflects the independent judgment of the lead agency.

CITY OF ROSEVILLE CALIFORNIA

DEVELOPMENT SERVICES DEPARTMENT–PLANNING DIVISION

311 Vernon St, Roseville, CA 95678 (916) 774-5276

INITIAL STUDY & ENVIRONMENTAL CHECKLIST

Project Title/File Number:	INFILL PCL 178 – Verizon Riverside Monopine/ File # PL19-0040
Project Location:	The project is located at 900 Riverside Ave, on 1.60 acres in the Infill area of the City of Roseville.
Project Description:	The project includes a Conditional Use Permit to construct a new 68-foot-tall monopine telecommunications facility. The tower will be located within a 30'x20' lease area with outdoor equipment, on a 4'x15' concrete slab. The lease area will be enclosed with a six-foot-tall chain link fence with privacy slats.
Project Applicant:	Celeste Magennis – Epic Wireless - 605 Coolidge Dr. Suite 100, Folsom, CA 95630 – (530) 417-1883
Property Owner:	BMP II LLC – 8636 Antelope North Rd., Antelope, CA 95843
Lead Agency Contact:	Shelby Vockel, Associate Planner – City of Roseville, 311 Vernon St., Roseville, CA 95678 – (916)746-1347

This initial study has been prepared to identify and assess the anticipated environmental impacts of the above described project application. The document relies on the Amoruso Ranch Specific Plan Final Environmental Impact Report and site-specific studies prepared to address in detail the effects or impacts associated with the project. Where documents were submitted by consultants working for the applicant, City staff reviewed such documents in order to determine whether, based on their own professional judgment and expertise, staff found such documents to be credible and persuasive. Staff has only relied on documents that reflect their independent judgment, and has not accepted at face value representations made by consultants for the applicant.

This document has been prepared to satisfy the California Environmental Quality Act (CEQA), (Public Resources Code, Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000 et seq.). CEQA requires that all state and local government agencies consider the environmental consequences of projects over which they have discretionary authority before acting on those projects.

The initial study is a public document used by the decision-making lead agency to determine whether a project may have a significant effect on the environment. If the lead agency finds substantial evidence that any aspect of the project, either individually or cumulatively, may have a significant effect on the environment, regardless of whether the overall effect of the project is adverse or beneficial, the lead agency is required to prepare an EIR. If the agency finds no substantial evidence that the project or any of its aspects may cause a significant effect on the environment, a negative declaration shall be prepared. If in the course of analysis, the agency recognizes that the project may have a significant impact on the environment, but that by incorporating specific mitigation measures to which the applicant agrees, the impact will be reduced to a less than significant effect, a mitigated negative declaration shall be prepared.

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PROJECT DESCRIPTION

Project Location

The project site is located at 900 Riverside Ave, on the west side of Riverside Ave, approximately 400 feet north of the intersection of Riverside Ave and Cirby Way (Figure 1). The site is located on 1.60 acres in the Infill area, in the southern portion the City. The subject property is developed with an existing building and is fully paved. The parcels to the north, south, and east are also zoned for commercial uses, and are developed with commercial uses such as gas stations and an auto body shop. Residential uses are located to the west of the project site. Refer to Table 1 for land use designations and uses of the site and surrounding properties.

Figure 1 – Project Location

Table 1 – Zoning, Land Use, and Use of Property

Location	Zoning	General Plan Land Use	Actual Use of Property
Site	GC	General Commercial (GC)	Auto repair
North	MP	Light Industrial (LI)	Auto repair
South	GC	General Commercial (GC)	Auto repair
East	GC and CC	General Commercial (GC) and Community Commercial (CC)	Used car sales
West	PD 29	High Density Residential (HDR -17.5)	Multi-family residential

Environmental Setting

The project is located on one parcel, on the west side of Riverside Ave, in the Infill area of the City of Roseville. The project site is developed with a commercial building and fully paved. The site is surrounded by commercial parcels, primarily utilized for automotive-related uses, including a gas station, auto repair facilities, and used car sales. An existing apartment complex is located to the west of the project site.

Proposed Project

The project includes a Conditional Use Permit to allow the construction of a new 68-foot-tall monopine telecommunications facility. The tower will be located within a 30'x20' lease area with outdoor equipment, on a 4'x15' concrete slab. The lease area will be enclosed with a six-foot-tall chain link fence with privacy slats.

CITY OF ROSEVILLE MITIGATION ORDINANCES, GUIDELINES, AND STANDARDS

For projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified, CEQA Guidelines section 15183(f)allows a lead agency to rely on previously adopted development policies or standards as mitigation for the environmental effects, when the standards have been adopted by the City, with findings based on substantial evidence, that the policies or standards will substantially mitigate environmental effects, unless substantial new information shows otherwise (CEQA Guidelines §15183(f)). The City of Roseville adopted CEQA Implementing Procedures (Implementing Procedures) which are consistent with this CEQA Guidelines section. The current version of the Implementing Procedures were adopted in April 2008, along with Findings of Fact, as Resolution 08-172. The below regulations and ordinances were found to provide uniform mitigating policies and standards, and are applicable to development projects. The City's Mitigating Policies and Standards are referenced, where applicable, in the Initial Study Checklist.

- City of Roseville 2035 General Plan
- City of Roseville Zoning Ordinance (RMC Title 19)
- City of Roseville Design and Construction Standards (Resolution 16-75)
- Subdivision Ordinance (RMC Title 18)
- Noise Regulation (RMC Ch.9.24)
- Flood Damage Prevention Ordinance (RMC Ch.9.80)
- Drainage Fees (Dry Creek [RMC Ch.4.49] and Pleasant Grove Creek [RMC Ch.4.48])
- West Placer Stormwater Quality Design Manual (Resolution 16-152)
- Urban Stormwater Quality Management and Discharge Control Ordinance (RMC Ch. 14.20)
- Traffic Mitigation Fee (RMC Ch.4.44)
- Highway 65 Joint Powers Authority Improvement Fee (Resolution 2008-02)
- South Placer Regional Transportation Authority Transportation and Air Quality Mitigation Fee (Resolution 09-05)
- Tree Preservation Ordinance (RMC Ch.19.66)
- Community Design Guidelines (Resolution 95-347)
- Specific Plan Design Guidelines:
    - Development Guidelines Del Webb Specific Plan (Resolution 96-330)
    - Landscape Design Guidelines for North Central Roseville Specific Plan (Resolution 90-170)
    - North Roseville Specific Plan and Design Guidelines (Resolution 00-432)

- Northeast Roseville Specific Plan (Olympus Pointe) Signage Guidelines (Resolution 89-42)
- North Roseville Area Design Guidelines (Resolution 92-226)
- Northeast Roseville Specific Plan Landscape Design Guidelines (Resolution 87-31)
- Southeast Roseville Specific Plan Landscape Design Guidelines (Resolution 88-51)
- Stoneridge Specific Plan and Design Guidelines (Resolution 98-53)
- Highland Reserve North Specific Plan and Design Guidelines (Resolution 97-128)
- West Roseville Specific Plan and Design Guidelines (Resolution 04-40)
- Sierra Vista Specific Plan and Design Guidelines (Resolution 12-217)
- Creekview Specific Plan and Design Guidelines (Resolution 12-320)
- Amoruso Ranch Specific Plan and Design Guidelines (Resolution 16-273)

OTHER ENVIRONMENTAL DOCUMENTS RELIED UPON

- Amoruso Ranch Specific Plan Final Environmental Impact Report

Pursuant to CEQA Guidelines Section 15183, any project which is consistent with the development densities established by zoning, a Community Plan, or a General Plan for which an EIR was certified shall not require additional environmental review, except as may be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The Amoruso Ranch Specific Plan EIR updated the City's General Plan to 2035, and updated Citywide analyses of traffic, water supply, water treatment, wastewater treatment, and waste disposal. The proposed project is consistent with the adopted land use designations examined within the environmental documents listed above, and thus this Initial Study focuses on effects particular to the specific project site, impacts which were not analyzed within the EIR, and impacts which may require revisiting due to substantial new information. When applicable, the topical sections within the Initial Study summarize the findings within the environmental documents listed above. The analysis, supporting technical materials, and findings of the environmental document are incorporated by reference, and are available for review at the Civic Center, 311 Vernon Street, Roseville, CA.

EXPLANATION OF INITIAL STUDY CHECKLIST

The California Environmental Quality Act (CEQA) Guidelines recommend that lead agencies use an Initial Study Checklist to determine potential impacts of the proposed project on the physical environment. The Initial Study Checklist provides a list of questions concerning a comprehensive array of environmental issue areas potentially affected by this project. This section of the Initial Study incorporates a portion of Appendix G Environmental Checklist Form, contained in the CEQA Guidelines. Within each topical section (e.g. Air Quality) a description of the setting is provided, followed by the checklist responses, thresholds used, and finally a discussion of each checklist answer.

There are four (4) possible answers to the Environmental Impacts Checklist on the following pages. Each possible answer is explained below:

1) A "Potentially Significant Impact" is appropriate if there is enough relevant information and reasonable inferences from the information that a fair argument based on substantial evidence can be made to support a conclusion that a substantial, or potentially substantial, adverse change may occur to any of the physical conditions within the area affected by the project. When one or more "Potentially significant Impact" entries are made, an EIR is required.

2) A "Less Than Significant With Mitigation" answer is appropriate when the lead agency incorporates mitigation measures to reduce an impact from "Potentially Significant" to "Less than Significant." For

example, floodwater impacts could be reduced from a potentially-significant level to a less-than-significant level by relocating a building to an area outside of the floodway. The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level. Mitigation measures are identified as MM followed by a number.

3) A "Less Than significant Impact" answer is appropriate if there is evidence that one or more environmental impacts may occur, but the impacts are determined to be less than significant, or the application of development policies and standards to the project will reduce the impact(s) to a less-than-significant level. For instance, the application of the City's Improvement Standards reduces potential erosion impacts to a less-than-significant level.

4) A "No Impact" answer is appropriate where it can be demonstrated that the impact does not have the potential to adversely affect the environment. For instance, a project in the center of an urbanized area with no agricultural lands on or adjacent to the project area clearly would not have an adverse effect on agricultural resources or operations. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources cited in the Initial Study. Where a "No Impact" answer is adequately supported by the information sources cited in the Initial Study, further narrative explanation is not required. A "No Impact" answer is explained when it is based on project-specific factors as well as generous standards.

All answers must take account of the whole action involved, including off- and on-site, indirect, direct, construction, and operation impacts, except as provided for under State CEQA Guidelines.

INITIAL STUDY CHECKLIST

I. Aesthetics

The project site is located within a commercially zoned area of the city. The site is developed with an existing commercial building and is fully paved. A multi-family residential apartment complex is located to the west of the project site. Auto-related commercial uses are located to the north, south, and east. The site is also located near the intersection of two arterial roadways, including Riverside Ave. and Cirby Way.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				X

Thresholds of Significance and Regulatory Setting:

The significance of an environmental impact cannot always be determined through the use of a specific, quantifiable threshold. CEQA Guidelines Section 15064(b) affirms this by the statement "an ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting." This is particularly true of aesthetic impacts. As an example, a proposed parking lot in a dense urban center would have markedly different visual effects than a parking lot in an open space area. For the purpose of this study, the significance thresholds are as stated in CEQA Guidelines Appendix G, as shown in a–d of the checklist below. The Findings of the Implementing Procedures indicate that compliance with the Zoning Ordinance (e.g. building height, setbacks, etc), Subdivision Ordinance (RMC Ch. 18), and the Community Design Guidelines (Resolution 95-347), will prevent significant impacts in urban settings as it relates to items a, b, and c, below.

Discussion of Checklist Answers:

a–b) There are no designated or eligible scenic vistas or scenic highways within or adjacent to the City of Roseville.

c) The project site is in an urban setting, and as a result lacks any prominent or high-quality natural features which could be negatively impacted by development. The project proposes a monopine design to camouflage the cell tower facility, and the project area will be in proximity to mature pine trees to the west. The City of Roseville has adopted Community Design Guidelines (CDG) for the purpose of creating building and community designs which are a visual asset to the community. The CDG includes guidelines for building design, site design and landscape design, which will result in a project that enhances the existing urban visual environment. Accordingly, the aesthetic impacts of the project are less than significant.

d) The project involves motion-activated lighting to provide for the security and safety of the facility However, the project is already located within an urbanized setting with many existing lighting sources. Lighting is conditioned to comply with City standards (i.e. CDG) to limit the height of light standards and to require cut-off lenses and glare

shields to minimize light and glare impacts. The project will not create a new source of substantial light. None of the project elements are highly reflective, and thus the project will not contribute to an increased source of glare.

II. Agricultural & Forestry Resources

The State Department of Conservation oversees the Farmland Mapping and Monitoring Program, which was established to document the location, quality, and quantity of agricultural lands, and the conversion of those lands over time. The primary land use classifications on the maps generated through this program are: Urban and Built Up Land, Grazing Land, Farmland of Local Importance, Unique Farmland, Farmland of Statewide Importance, and Prime Farmland. According to the current California Department of Conservation Placer County Important Farmland Map (2012), the majority of the City of Roseville is designated as Urban and Built Up Land and most of the open space areas of the City are designated as Grazing Land. There are a few areas designated as Farmland of Local Importance and two small areas designated as Unique Farmland located on the western side of the City along Baseline Road. The current Williamson Act Contract map (2013/2014) produced by the Department of Conservation shows that there are no Williamson Act contracts within the City, and only one (on PFE Road) that is adjacent to the City. None of the land within the City is considered forest land by the Board of Forestry and Fire Protection.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Thresholds of Significance and Regulatory Setting:

Unique Farmland, Farmland of Statewide Importance, and Prime Farmland are called out as protected farmland categories within CEQA Guidelines Appendix G. Neither the City nor the State has adopted quantified significance thresholds related to impacts to protected farmland categories or to agricultural and forestry resources. For the purpose of this study, the significance thresholds are as stated in CEQA Guidelines Appendix G, as shown in a–e of the checklist above.

Discussion of Checklist Answers:

a–e) The project site is not used for agricultural purposes, does not include agricultural zoning, is not within or adjacent to one of the areas of the City designated as a protected farmland category on the Placer County Important Farmland map, is not within or adjacent to land within a Williamson Act Contract, and is not considered forest land. Given the foregoing, the proposed project will have no impact on agricultural resources.

III. Air Quality

The City of Roseville, along with the south Placer County area, is located in the Sacramento Valley Air Basin (SVAB). The SVAB is within the Sacramento Federal Ozone Non-Attainment Area. Under the Clean Air Act, Placer County has been designated a "serious non-attainment" area for the federal 8-hour ozone standard, “non-attainment” for the state ozone standard, and a "non-attainment" area for the federal and state PM_{10} standard (particulate matter less than 10 microns in diameter). Within Placer County, the Placer County Air Pollution Control District (PCAPCD) is responsible for ensuring that emission standards are not violated. Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Result in a cumulatively considerable net increase of any criteria for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Thresholds of Significance and Regulatory Setting:

In responding to checklist items a–c, project-related air emissions would have a significant effect if they would result in concentrations that either violate an ambient air quality standard or contribute to an existing air quality violation. To assist in making this determination, the PCAPCD adopted thresholds of significance, which were developed by considering both the health-based ambient air quality standards and the attainment strategies outlined in the State Implementation Plan. The PCAPCD-recommended significance threshold for reactive organic gases (ROG) and nitrogen oxides (NO_x) is 82 pounds daily during construction and 55 pounds daily during operation, and for particulate matter (PM) is 82 pounds per day during both construction and operation. For all other constituents, significance is determined based on the concentration-based limits in the Federal and State Ambient Air Quality Standards. Toxic Air Contaminants (TAC) are also of public health concern, but no thresholds or standards are provided because they are considered to have no safe level of exposure. Analysis of TAC is based on the *Air Quality and Land Use Handbook – A Community Health Perspective (*April 2005, California Air Resources Board), which lists TAC sources and recommended buffer distances from sensitive uses. For checklist item c, the PCAPCD's *CEQA Air Quality Handbook* (*Handbook*) recommends that the same thresholds used for the project analysis be used for the cumulative impact analysis.

With regard to checklist item d, there are no quantified significance thresholds for exposure to objectionable odors or other emissions. Significance is determined after taking into account multiple factors, including screening distances from odor sources (as found in the PCAPCD CEQA Handbook), the direction and frequency of prevailing winds, the time of day when emissions are detectable/present, and the nature and intensity of the emission source.

Discussion of Checklist Answers:

a–c) Analyses are not included for sulfur dioxide, lead, and other constituents because there are no mass emission thresholds; these are concentration-based limits in the Federal and State Ambient Air Quality Standards which require substantial, point-source emissions (e.g. refineries, concrete plants, etc) before exceedance will occur, and the SVAB is in attainment for these constituents. Likewise, carbon monoxide is not analyzed because the SVAB is in attainment for this constituent, and it requires high localized concentrations (called carbon monoxide "hot spots") before the ambient air quality standard would be exceeded. "Hot spots" are typically associated with heavy traffic congestion occurring at high-volume roadway intersections. The

Amoruso Ranch EIR analysis of Citywide traffic indicated that 198 out of 226 signalized intersections would operate at level of service C or better—that is, they will not experience heavy traffic congestion. It further indicated that analyses of existing CO concentrations at the most congested intersections in Roseville show that CO levels are well below federal and state ambient air quality standards. The discussions below focus on emissions of ROG**,** NO_x, or PM**.** A project-level analysis has been prepared to determine whether the project will, on a singular level, exceed the established thresholds.

The proposed project is a monopine tower which will support telecommunication antenna. The overall lease area for the tower is 600 square feet, and will be enclosed with a chain-link fence with slats. The tower will not be manned by employees during regular operation, though it will have occasional service by technicians. Up to four battery cabinets are anticipated to occupy the lease area, with two proposed as a part of the current project. Table 2-2 of the PCAPCD's screening methodology guidance indicates that general commercial projects smaller than 249,099 square feet, provided that there are no special circumstances that might result in higher emissions, will not generate NOx emissions that exceed the operational phase threshold of 55 lbs/day. At 600 square feet in area, with infrequent access by employees, the proposed monopine tower is well below the PCAPCD threshold.

The proposed project would not exceed the applicable thresholds of significance for air pollutant emissions during construction or operation. As such, the project would not conflict with or obstruct implementation of the *Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (which is the SIP) or contribute substantially to the PCAPCD's nonattainment status for ozone. In addition, because the proposed project would not produce substantial emissions of criteria air pollutants, CO, or TACs, adjacent residents would not be exposed to significant levels of pollutant concentrations during construction or operation. Therefore, implementation of the proposed project would result in less than significant impacts, and consistent with the analysis methodology outlined in the Significance Thresholds and Regulatory Setting section, cumulative impacts are less than significant.

With regard to TAC, there are hundreds of constituents which are considered toxic, but they are typically generated by stationary sources like gas stations, facilities using solvents, and heavy industrial operations. The proposed project is not a TAC-generating use, nor is it within the specified buffer area of a TAC-generating use, as established in the *Air Quality and Land Use Handbook – A Community Health Perspective*. Impacts due to substantial pollutant concentrations are less than significant.

e) Diesel fumes from construction equipment and delivery trucks are often found to be objectionable; however, construction is temporary and diesel emissions are minimal and regulated. Typical urban projects such as residences and retail businesses generally do not result in substantial objectionable odors when operated in compliance with City Ordinances (e.g. proper trash disposal and storage). The Project is a typical urban development that lacks any characteristics that would cause the generation of substantial unpleasant odors. Thus, construction and operation of the proposed project would not result in the creation of objectionable odors affecting a substantial number of people. A review of the project surroundings indicates that there are no substantial odor-generating uses near the project site; the project location meets the recommended screening distances from odor-generators provided by the PCAPCD. Impacts related to odors are less than significant.

IV. Biological Resources

The project is proposed within a 600-square foot lease area behind an existing auto repair facility. The proposed lease area is currently paved with asphalt, and no vegetation exists within the project area.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Thresholds of Significance and Regulatory Setting:

There is no ironclad definition of significance as it relates to biological resources. Thus, the significance of impacts to biological resources is defined by the use of expert judgment supported by facts, and relies on the policies, codes, and regulations adopted by the City and by regulatory agencies which relate to biological resources (as cited and described in the Discussion of Checklist Answers section). Thresholds for assessing the significance of environmental impacts are based on the CEQA Guidelines checklist items a–f, above. Consistent with CEQA Guidelines Section 15065, a project may have a significant effect on the environment if:

> The project has the potential to substantially degrade the quality of the environment*;* substantially reduce the habitat of a fish or wildlife species*;* cause a fish or wildlife population to drop below self-sustaining levels*;* threaten to eliminate a plant or animal community; [or] substantially reduce the number or restrict the range of an endangered, rare or threatened species . . .

Various agencies regulate impacts to the habitats and animals addressed by the CEQA Guidelines checklist. These include the United States Fish and Wildlife Service, National Oceanic and Atmospheric Administration–Fisheries, United States Army Corps of Engineers, Central Valley Regional Water Quality Control Board, and California Department of Fish and Wildlife. The primary regulations affecting biological resources are described in the sections below.

Checklist item a addresses impacts to special status species. A "special status" species is one which has been identified as having relative scarcity and/or declining populations. Special status species include those formally listed as threatened or endangered, those proposed for formal listing, candidates for federal listing, and those classified as species of special concern. Also included are those species considered to be "fully protected" by the California Department of Fish and Wildlife (California Fish and Wildlife), those granted "special animal" status for tracking and monitoring purposes, and those plant species considered to be rare, threatened, or endangered in California by the California Native Plant Society (CNPS). The primary regulatory protections for special status species are within the Federal Endangered Species Act, California Endangered Species Act, California Fish and Game Code, and the Federal Migratory Bird Treaty Act.

Checklist item b addresses all "sensitive natural communities" and riparian (creekside) habitat that may be affected by local, state, or federal regulations/policies while checklist item c focuses specifically on one type of such a community: protected wetlands. Focusing first on wetlands, the 1987 Army Corps Wetlands Delineation Manual is used to determine whether an area meets the technical criteria for a wetland. A delineation verification by the Army Corps verifies the size and condition of the wetlands and other waters in question, and determines

the extent of government jurisdiction as it relates to Section 404 of the Federal Clean Water Act and Section 401 of the State Clean Water Act.

The Clean Water Act protects all "navigable waters", which are defined as traditional navigable waters that are or were used for commerce, or may be used for interstate commerce; tributaries of covered waters; and wetlands adjacent to covered waters, including tributaries. Non-navigable waters are called isolated wetlands, and are not subject to either the Federal or State Clean Water Act. Thus, isolated wetlands are not subject to federal wetland protection regulations. However, in addition to the Clean Water Act, the State also has jurisdiction over impacts to surface waters through the Porter-Cologne Water Quality Control Act (Porter-Cologne), which does not require that waters be "navigable". For this reason, isolated wetlands are regulated by the State of California pursuant to Porter-Cologne. The City of Roseville General Plan also provides protection for wetlands, including isolated wetlands, pursuant to the General Plan Open Space and Conservation Element. Federal, State and City regulations/policies all seek to achieve no net loss of wetland acreage, values, or function.

Aside from wetlands, checklist item b also addresses other "sensitive natural communities" and riparian habitat, which includes any habitats protected by local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The City of Roseville General Plan Open Space and Conservation Element includes policies for the protection of riparian areas and floodplain areas; these are Vegetation and Wildlife section Policies 2 and 3. Policy 4 also directs preservation of additional area around stream corridors and floodplain if there is sensitive woodland, grassland, or other habitat which could be made part of a contiguous open space area. Other than wetlands, which were already discussed, US Fish and Wildlife and California Department of Fish and Wildlife habitat protections generally result from species protections, and are thus addressed via checklist item a.

For checklist item d, there are no regulations specific to the protection of migratory corridors. This item is addressed by an analysis of the habitats present in the vicinity and analyzing the probable effects on access to those habitats which will result from a project.

The City of Roseville Tree Preservation ordinance (RMC Ch.19.66) requires protection of native oak trees, and compensation for oak tree removal. The Findings of the Implementing Procedures indicate that compliance with the City of Roseville Tree Preservation ordinance (RMC Ch.19.66) will prevent significant impacts related to loss of native oak trees, referenced by item e, above.

Regarding checklist item f, there are no adopted Habitat Conservation Plans within the City of Roseville.

Discussion of Checklist Answers:

a-c) The project will be located in a developed, urban area that is completely paved. There is no impact to special status species, sensitive natural communities, or wetland areas.

d) The City includes an interconnected network of open space corridors and preserves located throughout the City, to ensure that the movement of wildlife is not substantially impeded as the City develops. The development of the project site will not negatively impact these existing and planned open space corridors, nor is the project site located in an area that has been designated by the City, United States Fish and Wildlife, or California Department of Fish and Wildlife as vital or important for the movement of wildlife or the use of native wildlife nursery sites.

e) No trees will be removed or encroached upon with the development of this project.

f) There are no Habitat Conservation Plans; Natural Community Conservation Plans; or other approved local, regional, or state habitat conservation plans that apply to the project site.

V. Cultural Resources

As described within the Open Space and Conservation Element of the City of Roseville General Plan, the Roseville region was within the territory of the Nisenan (also Southern Maidu or Valley Maidu). Two large permanent Nisenan habitation sites have been identified and protected within the City's open space (in Maidu Park). Numerous smaller cultural resources, such as midden deposits and bedrock mortars, have also been recorded in the City. The gold rush which began in 1848 marked another settlement period, and evidence of Roseville's ranching and mining past are still found today. Historic features include rock walls, ditches, low terraces, and other remnants of settlement and activity. A majority of documented sites within the City are located in areas designated for open space uses.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of an historic resource pursuant to in Section 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				X
c) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts to cultural resources is based directly on the CEQA Guidelines checklist items a–e listed above. The Archaeological, Historic, and Cultural Resources section of the City of Roseville General Plan also directs the proper evaluation of and, when feasible, protection of significant resources (Policies 1 and 2). There are also various federal and State regulations regarding the treatment and protection of cultural resources, including the National Historic Preservation Act and the Antiquities Act (which regulate items of significance in history), Section 7050.5 of the California Health and Safety Code, Section 5097.9 of the California Public Resources Code (which regulates the treatment of human remains) and Section 21073 et seq. of the California Public Resources Code (regarding Tribal Cultural Resources). The CEQA Guidelines also contains specific sections, other than the checklist items, related to the treatment of effects on historic resources.

Pursuant to the CEQA Guidelines, if it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (Section 21083.2 (a), (b), and (c)). A *historical resource* is a resource listed, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR) (Section 21084.1); a resource included in a local register of historical resources (Section 15064.5(a)(2)); or any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be

historically significant (Section 15064.5 (a)(3)). Public Resources Code Section 5024.1 requires evaluation of historical resources to determine their eligibility for listing on the CRHR.

Discussion of Checklist Answers:

a-d) No cultural or paleontological resources are known to exist on the project site; however, standard mitigation measures, as detailed in the Tribal Cultural Resources section of this Initial Study, apply which are design to reduce impacts to cultural resources, should any be found on-site. The measure requires an immediate cessation of work, and contact with the appropriate agencies to address the resource before work can resume. With mitigation, project-specific impacts are less than significant.

VI. Energy

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy inefficiency?			X	

Thresholds of Significance and Regulatory Setting:

Established in 2002, California's Renewable Portfolio Standard (RPS) currently requires that 33 percent of electricity retail sales by served by renewable energy resources by 2020, and 50 percent by 2030. The City published a Renewables Portfolio Standard Procurement Plan in June 2018, and continues to comply with the RPS reporting and requirements and standards. There are no numeric significance thresholds to define "wasteful, inefficient, or unnecessary" energy consumption, and therefore significance is based on CEQA Guidelines checklist items a and b, above, and by the use of expert judgment supported by facts, relying on the policies, codes, and regulations adopted by the City and by regulatory agencies which relate to energy. The analysis considers compliance with regulations and standards, project design as it relates to energy use (including transportation energy), whether the project will result in a substantial unplanned demand on the City's energy resources, and whether the project will impede the ability of the City to meet the RPS standards.

Discussion of Checklist Answers:

a & b) Roseville Electric provided an estimated energy use in kilowatt hours (kwh) based on similar projects and installation. It was estimated that the proposed project would utilize energy at a rate between 5,000 and 6,500 kWh per month. The project would consume energy both during project construction and during project operation.

During construction, fossil fuels, electricity, and natural gas would be used by construction vehicles and equipment. However, the energy consumed during construction would be temporary, and would not represent

a significant demand on available resources. There are no unusual project characteristics that would necessitate the use of construction equipment or methods that would be less energy-efficient or which would be wasteful.

The completed project would consume energy related to building operation, exterior lighting, landscape irrigation and maintenance, and vehicle trips to and from the use. In accordance with California Energy Code Title 24, the project would be required to meet the Building Energy Efficiency Standards. The project was distributed to both PG&E and Roseville Electric for comments, and was found to conform to the standards of both providers; energy supplies are available to serve the project.

The project is consistent with the existing land use designation of General Commercial, though the project is not located in a Specific Plan area. The project is consistent with the existing land use designation, and therefore is consistent with the current citywide assessment of energy demand, and will not result in substantial unplanned, inefficient, wasteful, or unnecessary consumption of energy; impacts are less than significant.

VII. Geology and Soils

As described in the Safety Element of the City of Roseville General Plan, there are three inactive faults (Volcano Hill, Linda Creek, and an unnamed fault) in the vicinity, but there are no known active seismic faults within Placer County. The last seismic event recorded in the South Placer area occurred in 1908, and is estimated to have been at least a 4.0 on the Richter Scale. Due to the geographic location and soil characteristics within the City, the General Plan indicates that soil liquefaction, landslides, and subsidence are not a significant risk in the area.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				X
i) Ruptures of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Be located in a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to geology and soils is based directly on the CEQA Guidelines checklist items a–f listed above. Regulations applicable to this topic include the Alquist-Priolo Act, which addresses earthquake safety in building permits, and the Seismic Hazards Mapping Act, which requires the state to gather and publish data on the location and risk of seismic faults. The Archaeological, Historic, and Cultural Resources section of the City of Roseville General Plan also directs the proper evaluation of and, when feasible, protection of significant archeological resources, which for this evaluation will include paleontological resources (Policies 1 and 2). Section 50987.5 of the California Public Code Section is only applicable to public land; this section prohibits the excavation, removal, destruction, or defacement/injury to any vertebrate paleontological site, including fossilized footprints or other paleontological feature.

The Findings of the Implementing Procedures indicate that compliance with the Flood Damage Prevention Ordinance (RMC Ch.9.80) and Design/Construction Standards (Resolution 07-107) will prevent significant impacts related to checklist item b. The Ordinance and standards include permit requirements for construction and development in erosion-prone areas and ensure that grading activities will not result in significant soil erosion or loss of topsoil. The use of septic tanks or alternative waste systems is not permitted in the City of Roseville, and therefore no analysis of criterion e is necessary.

Discussion of Checklist Answers:

a) The project will not expose people or structures to potential substantial adverse effects involving seismic shaking, ground failure or landslides.

i–iii) According to United States Geological Service mapping and literature, active faults are largely considered to be those which have had movement within the last 10,000 years (within the Holocene or Historic time periods)[1] and there are no major active faults in Placer County. The California Geological Survey has prepared a map of the state which shows the earthquake shaking potential of areas throughout California based primarily on an area's distance from known active faults. The map shows that the City lies in a relatively low-intensity ground-shaking zone. Commercial, institutional, and residential buildings as well as all related infrastructure are required, in conformance with Chapter 16, *Structural Design Requirements*, Division IV, *Earthquake Design* of the California Building Code, to lessen the exposure to potentially damaging vibrations through seismic-resistant design. In compliance with the Code, all structures in the Project area would be well-built to withstand ground shaking from possible earthquakes in the region; impacts are less than significant.

iv) Landslides typically occur where soils on steep slopes become saturated or where natural or manmade conditions have taken away supporting structures and vegetation. The existing and proposed slopes of the project site are not steep enough to present a hazard during development or upon completion of the project. In addition, measures would be incorporated during construction to shore minor slopes and prevent potential earth movement. Therefore, impacts associated with landslides are less than significant.

b) Grading activities will result in the disruption, displacement, compaction and over-covering of soils associated with site preparation (grading and trenching for utilities). Grading activities for the project will be limited to the project site. Grading activities require a grading permit from the Engineering Division. The grading permit is reviewed for compliance with the City's Improvement Standards, including the provision of proper drainage, appropriate dust control, and erosion control measures. Grading and erosion control measures will be incorporated into the required grading plans and improvement plans. Therefore, the impacts associated with disruption, displacement, and compaction of soils associated with the project are less than significant.

c, d) A review of the Natural Resources Conservation Service Soil Survey for Placer County, accessed via the Web Soil Survey (http://websoilsurvey.nrcs.usda.gov/app/), indicates that the soils on the site are Urban Land – Xerarents- Fiddyment complex, with 0 to 8 percent slopes, which are not listed as geologically unstable or sensitive.

f) No paleontological resources are known to exist on the project site; however, standard mitigation measures apply which are designed to reduce impacts to such resources, should any be found on-site. The measure requires an immediate cessation of work, and contact with the appropriate agencies to address the resource before work can resume. Project-specific impacts are less than significant.

VIII. Greenhouse Gases

Greenhouse gases trap heat in the earth's atmosphere. The principal greenhouse gases (GHGs) that enter the atmosphere because of human activities are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated gases. As explained by the United States Environmental Protection Agency[2], global average temperature has increased by more than 1.5 degrees Fahrenheit since the late 1800s, and most of the warming of the past half century has been caused by human emissions. The City has taken proactive steps to reduce greenhouse gas emissions, which include the introduction of General Plan policies to reduce emissions, changes

[1] United States Geological Survey, http://earthquake.usgs.gov/learn/glossary/?term=active%20fault, Accessed January 2016
[2] http://www3.epa.gov/climatechange/science/overview.html, Accessed January 2016

to City operations, and climate action initiatives. The General Plan Air Quality and Climate Change Element is available here:

https://www.roseville.ca.us/UserFiles/Servers/Server_7964838/File/Government/Departments/Development%20Services/Planning/General%20Plan/04_Air_Quality_&_Climate_Change_web.pdf

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Thresholds of Significance and Regulatory Setting:

In Assembly Bill 32 (the California Global Warming Solutions Act), signed by Governor Schwarzenegger of California in September 2006, the legislature found that climate change resulting from global warming was a threat to California, and directed that "the State Air Resources Board design emissions reduction measures to meet the statewide emissions limits for greenhouse gases . . .". The target established in AB 32 was to reduce emissions to 1990 levels by the year 2020. CARB subsequently prepared the *Climate Change Scoping Plan* (Scoping Plan) for California, which was approved in 2008. The Scoping Plan provides the outline for actions to reduce California's GHG emissions. CARB's updated August 2011 Scoping Plan calculated a reduction needed of 21.7% from future "Business As Usual" (BAU) conditions in the year 2020. The current Scoping Plan (adopted May 2014) indicates that statewide emissions of GHG in 1990 amounted to 431 million metric tons, and that the 2020 "Business As Usual" (BAU) scenario is estimated as 509[3] million metric tons, which would require a reduction of 15.3% from 2020 BAU. In addition to this, Senate Bill 32 was signed by the Governor on September 8, 2016, to establish a reduction target of 40 percent below 1990 levels by 2030. The Air Resources Board is currently updating the Scoping Plan to reflect this target.

The Placer County Air Pollution Control District (PCAPCD) recommends that thresholds of significance for GHG be related to AB 32 reduction goals, and has adopted thresholds of significance which take into account the 2030 reduction target. The thresholds include a de minimis and a bright-line maximum threshold. Any project emitting less than 1,100 metric tons of carbon dioxide equivalents per year (MT CO_2e/yr) during construction or operation results in less than significant impacts. The PCAPCD considers any project with emissions greater than the bright-line cap of 10,000 MT CO_2e/yr to have significant impacts. For projects exceeding the de minimis threshold but below the bright-line threshold, comparison to the appropriate efficiency threshold is recommended. The significance thresholds are shown in Table 1 below.

[3] Includes Pavely and Renewables Portfolio Standard reduction

Table 1: GHG Significance Thresholds

Bright-line Threshold 10,000 MT CO_2e/yr			
Residential Efficiency (MT CO_2e/capita[1])		**Non-Residential Efficiency (MT CO_2e/ksf[2])**	
Urban	**Rural**	**Urban**	**Rural**
4.5	5.5	26.5	27.3
De Minimis Threshold 1,100 MT CO_2e/yr			

1. Per Capita = per person
2. Per ksf = per 1,000 square feet of building

Discussion of Checklist Answers:

a–b) PCAPCD provides guidance for analyzing GHG impacts by modeling corresponding project sizes that relate to both the de minimis and bright line thresholds. While these numbers are for reference and results may vary based on land use, energy usage, and possible mitigation measures, the proposed project does not use an unusual amount of energy that would vary from the modeling estimate. The project is a 68-foot-tall monopine telecommunications facility located within a 600-square foot lease area. As discussed in the Energy section, the estimated energy usage of the proposed monopine is between 5,000 and 6,500 kWh per month. There will be no regular employee operation of the facility, and the site will be occasionally maintained. The PCAPCD's de minimis threshold has a corresponding project size of 35,635 square feet for general commercial projects. As the proposed project will operate in less than 600 square feet of area, the proposed project will operate well below the threshold, resulting in less than significant impacts.

Thus, project-generated GHG emissions would not conflict with, and are consistent with, the State goals listed in AB32 and policies and regulation adopted by the California Air Resources Board pursuant to AB32. This impact is considered less than significant.

IX. Hazards and Hazardous Materials

The project will be located at 900 Riverside Avenue, on a developed parcel in the Infill area of the City of Roseville. The project is not located on a site where existing hazardous materials have been identified, and the project does not have the potential to expose individuals to hazardous materials.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment though reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to hazardous materials is based directly on the CEQA Guidelines checklist items a–g listed above. A material is defined as hazardous if it appears on a list of hazardous materials prepared by a federal, state or local regulatory agency, or if it has characteristics defined as hazardous by such an agency. The determination of significance based on the above criteria depends on the probable frequency and severity of consequences to people who might be exposed to the health hazard, and the degree to which Project design or existing regulations would reduce the frequency of or severity of exposure. As an example, products commonly used for household cleaning are classified as hazardous when transported in large quantities, but one would not conclude that the presence of small quantities of household cleaners at a home would pose a risk to a school located within ¼-mile.

Many federal and State agencies regulate hazards and hazardous substances, including the United States Environmental Protection Agency (US EPA), California Department of Toxic Substances Control (DTSC), Central Valley Regional Water Quality Control Board (Regional Water Board), and the California Occupational Safety and Health Administration (CalOSHA). The state has been granted primacy (primary responsibility for oversight) by the US EPA to administer and enforce hazardous waste management programs. State regulations also have detailed planning and management requirements to ensure that hazardous materials are handled, stored, and disposed of properly to reduce human health risks. California regulations pertaining to hazardous waste management are published in the California Code of Regulations (see 8 CCR, 22 CCR, and 23 CCR).

The project is not within an airport land use plan or within two miles of a public or private use airport. Therefore, no further discussion is provided for item e.

Personal Wireless Service Facilities Background

Three of the major types of personal wireless communication services currently in use are described below (information from the Federal Communications Commission (FCC) website at http://wireless.fcc.gov/services/index.htm?job=wtb_services_home, accessed on July 23, 2019):

Cellular Telephone Service

Cellular telephone service is an extension of ordinary telephone services, except that it utilizes radio waves instead of wire to transmit and receive telephone calls. The cellular radiotelephone service is intended to provide customers with mobile telephone service over a broad geographic area. A cellular system operates by dividing a large geographic service area into cells and assigning the same frequencies to multiple, non-adjacent cells. This is known as "frequency reuse". When a cellular subscriber makes or receives a call, the call is connected to the nearest cell site. As a subscriber travels within a cellular provider's service area, the cellular telephone call in progress is transferred, or "handed-off", from one cell site to another without noticeable interruption. The smaller and more numerous a provider's cells are, the more it can reuse frequencies and the more users it can accommodate. In addition, all the cells in a cellular system are connected to a mobile telephone switching office (MTSO) by wireline (landline) or microwave links. The MTSO switches wireline-to-mobile and mobile-to-wireline calls between the public switched telephone network (PSTN) and the cell site. Cellular radio systems operate in the 824 – 849 MHz and 869 – 894 MHz frequency range, per FCC allocation.

Personal Communications Services (PCS)

PCS encompasses two different licensed services offered over two different frequency bands, as well as certain unlicensed service. "Narrowband" PCS operates on frequencies in the 901 – 941 MHz range and is suitable for offering a variety of specialized services such as Messaging and two-way paging. "Broadband" PCS is similar to cellular radiotelephone service, except that PCS operates in a higher frequency band (1850 – 1990 MHz) which allows for a wider variety of communications services such as digital, voice, data and paging

transmissions, over the same spectrum. Because PCS operates at a higher frequency than cellular service, PCS systems may require more antenna transmitters in the same geographic area.

Wireless Communications Service (WCS)

WCS may provide fixed, mobile, radiolocation or satellite communication services to individuals and businesses within their assigned spectrum block and geographical area. The WCS is capable of providing advanced wireless phone services which are able to pinpoint subscribers in any given locale. WCS is used to provide a variety of mobile services, including an entire family of new communication devices utilizing very small, lightweight, multi-function portable phones and advanced devices with two-way data capabilities. WCS systems are able to communicate with other telephone networks as well as with personal digital assistants, allowing subscribers to send and receive data and/or video messages without connection to a wire. By FCC allocation, WCS operates in one of two bands: 2305 – 2320 MHz and 2345 – 2360 MHz.

Electromagnetic Fields (EMFs) and Safety Standards

The FCC published "A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance" (June 2, 2000, hereafter called RF Guide), the purpose of which is to ensure that the antenna facilities located in communities comply with the FCC's limits for human exposure to radiofrequency (RF) electromagnetic fields. The RF Guide explains the science of RF and the electromagnetic spectrum, the exposure guidelines and rules, and explains the procedures for compliance. The FCC Office of Engineering and Technology has also published Bulletin 56 (and 65, an addendum) in 1999, which answers many common questions about RF and about exposure limits. The RF Guide and Bulletins 56 and 65 are incorporated by reference and are available for review online at http://www.fcc.gov/oet/rfsafety/. The information below is based entirely upon the incorporated publications.

As discussed above, personal wireless service facilities utilize radio waves to transmit and receive telephone calls. Radio waves and microwaves are forms of electromagnetic energy that are collectively described by the term "radiofrequency" or "RF." RF emissions can be discussed in terms of "energy," "radiation" or "fields." Radiation is simply defined as the movement of energy through space in the form of waves or particles. Electromagnetic radiation is when both electric and magnetic energy move together. The term "electromagnetic field" is used to indicate the presence of electromagnetic energy at a specific location. Like any wave-related phenomenon, electromagnetic energy is described by a wavelength and a frequency. RF signals are transmitted over a wide range of frequencies. The frequency of an RF signal is expressed in terms of cycles per second, or "Hertz" (Hz).

The range of wavelengths and frequencies of electromagnetic radiation is known as the electromagnetic spectrum. The frequency of the wave corresponds to its energy: a high frequency wave has high energy. Waves with sufficient energy are "ionizing", that is, they are capable of stripping electrons from atoms and molecules, which results in a fundamental alteration of the nature of those molecules. Only very high-frequency waves, such as X-rays and gamma rays, have sufficient energy to ionize atoms and molecules. At the low-frequency end of the electromagnetic spectrum are low-energy, non-ionizing waves such as radio waves and visible light. Radiation described as non-ionizing does not have sufficient energy to alter the nature of the atoms and molecules it encounters.

Electromagnetic energy is common in the environment, resulting from numerous human-made and natural sources. Human-made sources include electrical wiring, utility lines, appliances, computers, and television and radio broadcasts. Natural sources include the human body, the earth's magnetic field, and visible light. Electric and magnetic fields produced by every-day electrical appliances, radio waves, and microwaves are low-energy – even visible light is higher energy than these sources. High-energy waves at the top of the spectrum are X-rays and gamma rays.

The rate at which an organism will absorb RF energy is specific to the type of organism – this is referred to as the specific absorption rate (SAR), defined as the power absorbed per mass of tissue (watts per kilogram). Therefore, standards for maximum safe exposure are set to limit the specific absorption rate (SAR) below a maximum permissible level as averaged over the human body. The absorption of this energy can result in thermal effects – that is, the energy produced causes heating of the tissues. At low-level RF radiation exposure, such as what is generated by appliances, cellular phones, and cellular towers, significant heating effects or health hazards are not observed.

To ensure that exposure remains well below safe limits, in August 1996 the Federal Communications Commission (FCC) adopted guidelines for evaluating the environmental effects of radio frequency emissions (FCC, (1996) Report and Order, ET Docket No. 93-62 Washington, D.C.). A subsequent Report and Order was issued in March 2013 (ET Docket No. 13-84 Washington, D.C.), determining that SAR is the primary and most appropriate metric to measure compliance. The guidelines effectively set a national radio frequency (RF) exposure standard based on elements of both the 1992 revision of the American National Standards Institute (ANSI) standard for RF exposure and the exposure criteria recommended by the National Council on Radiation Protection and Measurements (NCRP).

The 1996 FCC limits for maximum permissible exposure specifies two tiers of exposure criteria, one tier for "controlled environments" (usually involving occupational environments) and a second, more stringent tier for "uncontrolled environments" (usually involving the general public). The FCC limits set the allowable specific absorption rate (SAR) level from *localized* exposure (e.g., hand-held devices) at 1.6 watts per kilogram of tissue (W/kg) for the general public (uncontrolled environments), as averaged over 1 gram of tissue. The FCC recommended exposure limits for generalized exposure are summarized in Table 1 of Bulletin 56, which includes maximum power density levels for RF energy originating from communication sites (as well as other sources). The levels are determined based on continuous exposure, are dependent on the frequency which is transmitted from the site, and are usually expressed in milliwatts per square centimeter (mW/cm^2).

Generally, personal wireless services such as cellular, PCS, and WCS transmit in a frequency range of 600 – 2200 MHz (megahertz). Power density limits for uncontrolled environments (i.e., general public) from transmitters in this range are calculated by dividing the frequency by 1500 (f/1500). Therefore, a facility transmitting at a frequency of 850 MHz would have a maximum recommended power density of 0.567 mW/cm^2. At frequencies of 1500 – 100,000MHz the maximum power density is set at 1.0 mW/cm^2.

Regulatory Background

Section 704 of the Telecommunications Act of 1996 (the "1996 Act") addresses federal, state and local government oversight of site selection for personal wireless service facilities such as towers for cellular, personal communication services, and specialized mobile radio transmitters. The 1996 Act states the following regarding a local government's jurisdiction pertaining to the environmental effects of radio frequency emissions (FCC, Wireless Telecommunications Bureau (1996), Fact Sheet #1 National Wireless Facilities Siting Policies, Washington, D.C.):

"No state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

On January 1, 1997, the new Guidelines adopted by the FCC (referred to as "the Commission" in the 1996 Act section cited above) went into effect. As discussed above, the new guidelines set a national RF exposure standard which is based on elements of both the 1992 revision of the ANSI/IEEE standard and the exposure criteria recommended by the National Council on Radiation Protection and Measurements. In addition, the updated guidelines are based on recommendations from those federal agencies responsible for health and

safety, including the Environmental Protection Agency (EPA), the Center for Devices and Radiological Health (CDRH) of the Food and Drug Administration (FDA), the National Institute for Occupational Safety and Health (NIOSH) and the Occupational Safety and Health Administration (OSHA). The FCC has stated that the updated guidelines will ensure that the public and workers are adequately protected from exposure to potentially harmful RF emissions.

Discussion of Checklist Answers:

a, b) Standard construction activities would require the use of hazardous materials such as fuels, oils, lubricants, glues, paints and paint thinners, soaps, bleach, and solvents. These are common household and commercial materials routinely used by both businesses and average members of the public. The materials only pose a hazard if they are improperly used, stored, or transported either through upset conditions (e.g. a vehicle accident) or mishandling. In addition to construction use, the operational project would result in the use of common hazardous materials as well, including bleach, solvents, and herbicides. Regulations pertaining to the transport of materials are codified in 49 Code of Federal Regulations 171–180, and transport regulations are enforced and monitored by the California Department of Transportation and by the California Highway Patrol. Specifications for storage on a construction site are contained in various regulations and codes, including the California Code of Regulations, the Uniform Fire Code, and the California Health and Safety Code. These same codes require that all hazardous materials be used and stored in the manner specified on the material packaging. Existing regulations and programs are sufficient to ensure that potential impacts as a result of the use or storage of hazardous materials are reduced to less than significant levels.

A Radio Frequency Electromagnetic Fields Exposure Report prepared for the applicant, Epic Wireless Group, on February 4, 2019 provides an analysis of the proposed wireless telecommunications facility, and the potential electromagnetic field (EMF) exposure levels anticipated with the operation of the facility. The report (Attachment 1) uses the FCC's Maximum Permissible Exposure (MPE) limits to determine whether or not the project will place individuals within allowable regulatory limits. There are no known significant biological effects associated with cellular facilities when they are operated at or below FCC-adopted standards.

The report illustrates exposure levels at several different heights, expressed as a percentage of the allowable MPE limits. According to the report, Verizon's proposed site resulted in exposure levels below the FCC's most stringent General Population MPE limits. Below 22 feet in height, the exposure level to individuals is less than 5-percent of the MPE limit. The highest exposure levels (exceeding the recommended MPE) occur at antenna elevation (60 feet), within 42-feet of the proposed antenna. The report illustrates that no structures or buildings are located within 42-feet of the antenna at the antenna elevation. Although the exposure levels at the antenna elevation will exceed standards, access to this area is limited to RF trained personnel who have been made fully aware of potential for exposure, have control and know how to reduce their exposure with the use of personal protection equipment, as well as the ability to power down transmitters.

Based on the analysis in the report, as well as the regulatory requirements and significance thresholds imposed by the FCC, the proposed project will comply with FCC regulations pertaining to RF, EMF, and wireless telecommunication facilities. Impacts related to hazardous emissions exposure are less than significant.

c) See response to Items (a) and (b) above. While development of the site will result in the use, handling, and transport of materials deemed to be hazardous, the materials in question are commonly used in both residential and commercial applications, and include materials such as bleach and herbicides. The project will not result in the use of any acutely hazardous materials, substances, or waste.

d) The project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5[4]; therefore, no impact will occur.

e) This project is located within an area currently receiving City emergency services and development of the site has been anticipated and incorporated into emergency response plans. As such, the project will cause a less than significant impact to the City's Emergency Response or Management Plans. Furthermore, the project will be required to comply with all local, State and federal requirements for the handling of hazardous materials, which will ensure less-than-significant impacts. These will require the following programs:

- A Risk Management and Prevention Program (RMPP) is required of uses that handle toxic and/or hazardous materials in quantities regulated by the California Health and Safety Code and/or the City.

- Businesses that handle toxic or hazardous materials are required to complete a Hazardous Materials Management Program (HMMP) pursuant to local, State, or federal requirements.

g) The California Department of Forestry and Fire Protection (CAL FIRE) is the state agency responsible for wildland fire protection and management. As part of that task, CAL FIRE maintains maps designating Wildland Fire Hazard Severity zones. The City is not located within a Very High Fire Hazard Severity Zone, and is not in a CAL FIRE responsibility area; fire suppression is entirely within local responsibility. The project site is in an urban area, and therefore would not expose people to any risk from wildland fire. There would be no impact with regard to this criterion.

X. Hydrology and Water Quality

As described in the Open Space and Conservation Element of the City of Roseville General Plan, the City is located within the Pleasant Grove Creek Basin and the Dry Creek Basin. Pleasant Grove Creek and its tributaries drain most of the western and central areas of the City and Dry Creek and its tributaries drain the remainder of the City. Most major stream areas in the City are located within designated open space.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X

[4] http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				X
i) result in substantial erosion or siltation on or off-site;				X
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				X
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater systems or provide substantial additional sources of polluted runoff; or				X
iv) impede or redirect flood flows?				X
d) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				X
e) In flood hazard, tsunami, or seiches zones, risk release of pollutants due to project innundation?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to hydrology and water quality is based directly on the CEQA Guidelines checklist items a–e listed above. For checklist item a, c (i), d, and e, the Findings of the Implementing Procedures indicate that compliance with the City of Roseville Design/Construction Standards (Resolution 07-107), Urban Stormwater Quality Management and Discharge Control Ordinance (RMC Ch. 14.20), and Stormwater Quality Design Manual (Resolution 16-152) will prevent significant impacts related to water quality or erosion. The standards require preparation of an erosion and sediment control plan for construction activities and includes designs to control pollutants within post-construction urban water runoff. Likewise, it is indicated that the Drainage Fees for the Dry Creek and Pleasant Grove Watersheds (RMC Ch.4.48) and City of Roseville

Design/Construction Standards (Resolution 07-107) will prevent significant impacts related to checklist items c (ii) and c (iii). The ordinance and standards require the collection of drainage fees to fund improvements that mitigate potential flooding impacts, and require the design of a water drainage system that will adequately convey anticipated stormwater flows without increasing the rate or amount of surface runoff. These same ordinances and standards prevent impacts related to groundwater (items a and d), because developers are required to treat and detain all stormwater onsite using stormwater swales and other methods which slow flows and preserve infiltration. Finally, it is indicated that compliance with the Flood Damage Prevention Ordinance (RMC Ch. 9.80) will prevent significant impacts related to items c (iv) and e. The Ordinance includes standard requirements for all new construction, including regulation of development with the potential to impede or redirect flood flows, and prohibits development within flood hazard areas. Impacts from tsunamis and seiches were screened out of the analysis (item e) because the project is not located near a water body or other feature that would pose a risk of such an event.

Discussion of Checklist Answers:

a,c (i),d, e) The project will be constructed in an area that is already full developed and paved with asphalt. The project will not increase the amount of impervious surfacing within the project area. During construction, some disturbance of the ground and existing paving will occur. Disturbing the soil can allow sediment to be mobilized by rain or wind, and cause displacement into waterways. To address this and other issues, the developer is required to receive approval of a grading permit and/or improvement plans prior to the start of construction. The permit or plans are required to incorporate mitigation measures for dust and erosion control. In addition, the City has a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit issued by the Central Valley Regional Water Quality Control Board which requires the City to reduce pollutants in stormwater to the maximum extent practicable. The City does this, in part, by means of the City's 2016 Design/Construction Standards, which require preparation and implementation of a Stormwater Pollution Prevention Plan. All permanent stormwater quality control measures must be designed to comply with the City's Manual for Stormwater Quality Control Standards for New Development, the City's 2016 Design/Construction Standards, Urban Stormwater Quality Management and Discharge Control Ordinance, and Stormwater Quality Design Manual. For these reasons, impacts related to water quality are less than significant.

b, d) The project does not involve the installation of groundwater wells. The City maintains wells to supplement surface water supplies during multiple dry years, but the effect of groundwater extraction on the aquifer was addressed in the Water Supply Assessment of the Amoruso Ranch Specific Plan EIR, which included a Citywide water analysis. The proposed project is consistent with the General Plan land use designation, and is thus consistent with the citywide Water Supply Assessment. Project impacts related to groundwater extraction are less than significant. Furthermore, all permanent stormwater quality control measures must be designed to comply with the Stormwater Quality Design Manual, which requires the use of bioswales and other onsite detention and infiltration methods. These standards ensure that stormwater will continue to infiltrate into the groundwater aquifer.

c (ii and iii)) The project has been reviewed by City Engineering staff for conformance with City ordinances and standards. The project includes adequate and appropriate facilities to ensure no net increase in the amount or rate of stormwater runoff from the site, and which will adequately convey stormwater flows.

c (iv) and e) The project has been reviewed by City Engineering staff for conformance with City ordinances and standards. The project is not located within either the Federal Emergency Management Agency floodplain or the City's Regulatory Floodplain (defined as the floodplain which will result from full buildout of the City). Therefore, the project will not impede or redirect flood flows, nor will it be inundated. The proposed project is located within an area of flat topography and is not near a waterbody or other feature which could cause a seiche or tsunami. There would be no impact with regard to these criterion.

XI. Land Use and Planning

The project is located within the Infill area of the City, and is not governed by a Specific Plan. The zoning designation and land use designation for the project is General Commercial (GC.) The project is consistent with the requirements of the General Plan and Zoning Ordinance.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to land use is based directly on the CEQA Guidelines checklist items a and b listed above. Consistency with applicable City General Plan policies, Improvement Standards, and design standards is already required and part of the City's processing of permits and plans, so these requirements do not appear as mitigation measures.

Discussion of Checklist Answers:

a) The subject parcel has a General Plan designation and zoning designation of GC. The General Plan anticipate development of the parcel, including adequate roads, pedestrian paths, and bicycle paths to provide connections within the community. The project will not physically divide an established community.

b) The proposed use is a wireless telecommunication facility, which is consistent with the GC land use and zoning designation. With the application for a Conditional Use Permit, the project is consistent with the Zoning Ordinance requirements for telecommunications facilities. No conflicts with policies adopted for the purpose of avoiding or mitigating an environmental effect have been identified.

XII. Mineral Resources

The Surface Mining and Reclamation Act (SMARA) of 1975 requires the State Geologist to classify land into Mineral Resource Zones (MRZ's) based on the known or inferred mineral resource potential of that land. The California Division of Mines and Geology (CDMG) was historically responsible for the classification and designation of areas containing—or potentially containing—significant mineral resources, though that responsibility now lies with the California Geological Survey (CGS). CDMG published Open File Report 95-10, which provides the mineral classification map for Placer County. A detailed evaluation of mineral resources has not been conducted within the City limits, but MRZ's have been identified. There are four broad MRZ categories (MRZ-1 through MRZ-4), and only MRZ-2 represents an area of known significant mineral resources. The City of Roseville General Plan EIR included Exhibit 4.1-3, depicting the location of MRZ's in the City limits. There is only one small MRZ-2 designation area, located at the far eastern edge of the City.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to mineral resources is based directly on the CEQA Guidelines checklist items a and b listed above.

Discussion of Checklist Answers:

a–b) The project site is not in the area of the City known to include any mineral resources that would be of local, regional, or statewide importance; therefore, the project has no impacts on mineral resources.

XIII. Noise

The project is located in an urban, commercial area at 900 Riverside Ave in the City of Roseville. Auto repair facilities are located to the north, east, and south of the proposed project area. Additionally, Riverside Ave (to the east of the proposed project) is an arterial roadway carrying high traffic volumes.

Would the project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive ground borne vibration of ground borne noise levels?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

Thresholds of Significance and Regulatory Setting:

Standards for transportation noise and non-transportation noise affecting existing or proposed land uses are established within the City of Roseville General Plan Noise Element Table IX-1 and IX-3, and these standards are used as the thresholds to determine the significance of impacts related to items a and c. The significance of other noise impacts is based directly on the CEQA Guidelines checklist items b and c listed above. The Findings of the Implementing Procedures indicate that compliance with the City Noise Regulation (RMC Ch. 9.24) will prevent significant non-transportation noise as it relates to items a and b. The Ordinance establishes noise exposure standards that protect noise-sensitive receptors from a variety of noise sources, including non-transportation/fixed noise, amplified sound, industrial noise, and events on public property. The project is not within an airport land use plan, within two miles of a public or public use airport and there are also no private airstrips in the vicinity of the project area. Therefore, item c has been ruled out from further analysis.

Discussion of Checklist Answers:

a) The proposed project includes an unmanned telecommunications facility, which typically generates minimal noise levels through the use of electrical equipment such as power supplies and cooling fans. An electrical generator will be on site that will activate for maintenance purposes, as well as during power outages. The site is surrounded by automotive repair uses to the north and south, as well as Riverside Ave (an arterial roadway) to the east, which generate substantially higher noise levels. It is anticipated that long-term noise impacts will be minimal and within the limits established by the City of Roseville Noise Ordinance, Municipal Code Section 9.24. Impacts related to the generation of ambient noise levels in excess of standards are less than significant.

b) Surrounding uses may experience short-term increases in groundborne vibration, groundborne noise, and airborne noise levels during construction. However, these increases would only occur for a short period of time. When conducted during daytime hours, construction activities are exempt from Noise Ordinance standards, but the standards do apply to construction occurring during nighttime hours. While the noise generated may be a minor nuisance, the City Noise Regulation standards are designed to ensure that impacts are not unduly intrusive. Based on this, the impact is less than significant.

XIV. Population and Housing

The project site has a land use designation of Community Commercial. The City of Roseville General Plan Table II-4 identifies the total number of residential units and population anticipated as a result of buildout of the City,

and the Specific Plan likewise includes unit allocations and population projections for the Plan Area. Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, though extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to population and housing is based directly on the CEQA Guidelines checklist items a and b listed above.

Discussion of Checklist Answers:

a) The CEQA Guidelines identify several ways in which a project could have growth-inducing impacts (Public Resources Code Section 15126.2), either directly or indirectly. Growth-inducement may be the result of fostering economic growth, fostering population growth, providing new housing, or removing barriers to growth. Growth inducement may be detrimental, beneficial, or of no impact or significance under CEQA. An impact is only deemed to occur when it directly or indirectly affects the ability of agencies to provide needed public services, or if it can be shown that the growth will significantly affect the environment in some other way. The project is consistent with the land use designation of the site. The project will improve cell phone service in the project vicinity, but will neither directly nor indirectly influence growth in the area. There is no impact anticipated.

b) The project will occur within a small lease area on an already paved portion of a commercial property. No housing exists on the project site, and there would be no impact with respect to these criteria.

XV. Public Services

Fire protection, police protection, park services, and library services are provided by the City. The project is located within the Roseville Elementary School District and Roseville Joint Union High School District.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government facilities, the construction of which

could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to public services is based directly on the CEQA Guidelines checklist items a–e listed above. The EIR for the Specific Plan addressed the level of public services which would need to be provided in order to serve planned growth in the community. Development Agreements and other conditions have been adopted in all proposed growth areas of the City which identify the physical facilities needed to serve growth, and the funding needed to provide for the construction and operation of those facilities and services; the project is consistent with the Specific Plan. In addition, the project has been routed to the various public service agencies, both internal and external, to ensure that the project meets the agencies' design standards (where applicable) and to provide an opportunity to recommend appropriate conditions of approval.

Discussion of Checklist Answers:

a) Maintenance employees may require the services of the Roseville Fire Department in the event of an emergency. Existing City codes and regulations require adequate water pressure in the water lines, and construction must comply with the Uniform Fire and Building Codes used by the City of Roseville. Additionally, the applicant is required to pay a fire service construction tax, which is used for purchasing capital facilities for the Fire Department. Existing codes, regulations, funding agreements, and facilities plans are sufficient to ensure less than significant impacts.

b) Maintenance employees may require the services of the Roseville Police Department in the event of an emergency. Pursuant to the Development Agreement for the project area, the developer is required to pay fees into a Community Facilities District, which provides funding for police services. Sales taxes and property taxes resulting from the development will add revenue to the General Fund, which also serves to fund police services. Existing codes, regulations, funding agreements, and facilities plans are sufficient to ensure less than significant impacts.

c-e) The project will have no impact on schools, parks, or other public facilities.

XVI. Recreation

The nearest park to the project site is Cresthaven Park, which is located approximately 1,900 linear feet away from the project site.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to recreation services is based directly on the CEQA Guidelines checklist items a–b listed above.

Discussion of Checklist Answers:

a-b) The project will have no impact on any recreational facilities.

XVII. Transportation

The project is located at 900 Riverside Avenue, near the intersection of Riverside Avenue and Cirby Way. Both Riverside Ave and Cirby Way are major arterials with transit facilities in the City of Roseville. Four bus stops are located within 600 feet of the project.

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Substantially increase hazards due to a geometric design feature(s) (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	

Thresholds of Significance and Regulatory Setting:

CEQA Guidelines Section 15064.3 indicates that a project's effect on automobile delay cannot be considered a significant impact, and directs transportation system analysis to focus on vehicle miles traveled (VMT), per checklist item b. However, the CEQA Guidelines also include consistency with a program, plan, or policy addressing transportation systems as an area of potential environmental effects (checklist item a). The City has adopted the following plans, ordinances, or policies applicable to this checklist item: Pedestrian Master Plan, Bicycle Master Plan, and Short-Range Transit Plan, and General Plan Circulation Element. The project is evaluated for consistencies with these plans and the policies contained within them, which includes an analysis of delay. The Circulation Element of the General Plan establishes Level of Service C or better as an acceptable operating condition at all signalized intersections during a.m. and p.m. peak hours. Exceptions to this policy may be made by the City Council, but a minimum of 70% of all signalized intersections must maintain LOS C. The Findings of the Implementing Procedures indicate that compliance with the Traffic Mitigation Fee (RMC Ch. 4.44) will fund roadway projects and improvements necessary to maintain the City's Level of Service standards for projects consistent with the General Plan and related Specific Plan. An existing plus project conditions (short-term) traffic impact study may be required for projects with unique trip generation or distribution characteristics, in areas of local traffic constraints, or to study the proposed project access. A cumulative plus project conditions (long-term) study is required if a project is inconsistent with the General Plan or Specific Plan and would generate more than 50 pm peak-hour trips. The guidelines for traffic study preparation are found in the City of Roseville Design and Construction Standards–Section 4.

For checklist item b, the CEQA Guidelines Section 15064.3 establishes a detailed process for evaluating the significance of transportation impacts. In accordance with this section, the analysis must focus on the generation of vehicle miles traveled (VMT). Projects within one-half mile of either an existing major transit stop[5] or a stop along an existing high quality transit corridor[6] should be presumed to have less than significant impacts, as should any project which will decrease VMT when compared with the existing conditions. VMT may be analyzed qualitatively if existing models or methods are not available to estimate VMT for a particular project; this will generally be appropriate for discussions of construction traffic VMT.

Impacts with regard to items c and d are assessed based on the expert judgment of the City Engineer and City Fire Department, as based upon facts and consistency with the City's Design and Construction Standards.

[5] A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. (Public Resources Code Section 21064.3)

[6] A corridor with fixed route bus service at service intervals of 15 minutes or less during peak commute hours.

Discussion of Checklist Answers:

a) The City of Roseville has adopted a Pedestrian Master Plan, Bicycle Master Plan, and Short-Range Transit Plan. The project was reviewed for consistency with these documents. The project does not require any new roadway, pedestrian, bicycle, or transit facilities. Access to the proposed monopine's lease area will be provided via existing roadways and driveways on private property. No impact is anticipated.

b) The project is an unmanned wireless telecommunications facility. Employees will occasionally visit the project site to maintain the structure. In addition, the project site is located within 600 feet of four transit stops along a major arterial roadway, per the Significance Threshold established above, impacts are assumed to be less than significant for project within one-half mile of existing transit.

c, d) The project has been reviewed by the City Engineering and City Fire Department staff, and has been found to be consistent with the City's Design Standards. Furthermore, standard conditions of approval added to all City project require compliance with Fire Codes and other design standards. Compliance with existing regulations ensure that impacts are less than significant.

XVIII. Tribal Cultural Resources

As described within the Open Space and Conservation Element of the City of Roseville General Plan, the Roseville region was within the territory of the Nisenan (also Southern Maidu or Valley Maidu). Two large permanent Nisenan habitation sites have been identified and protected within the City's open space (in Maidu Park). Numerous smaller cultural resources, such as midden deposits and bedrock mortars, have also been recorded in the City. A majority of documented sites within the City are located in areas designated for open space uses.

Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?				X

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Thresholds of Significance and Regulatory Setting:

In addition to archeological resources, tribal cultural resources are also given particular treatment. Tribal cultural resources are defined in Public Resources Code Section 21074, as either 1) a site, feature, place, geographically-defined cultural landscape, sacred place, or object with cultural value to a California Native American Tribe, that is listed or eligible for listing on the California Register or Historical Resources, or on a local register of historical resources or as 2) a resource determined by the lead agency, supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code section 5024.1(c), and considering the significance of the resource to a California Native American Tribe.

Discussion of Checklist Answers:

a) The project site is fully developed, and there are no known cultural resources on site. However, standard mitigation measures apply which are designed to reduce impacts to any previously undiscovered resources, should any be found on-site. The measure requires an immediate cessation of work, and contact with the appropriate agencies to address the resource before work can resume. Project-specific impacts are anticipated to be less than significant.

b) Notice of the proposed project was mailed to tribes which had requested such notice pursuant to AB 52. A request for consultation was received by City staff on July 22, 2019. Staff corresponded with representatives from the United Auburn Indian Community to ensure mitigation for protection in the event of an unanticipated discovery, as well as to reflect that a Tribal Monitor has been requested and approved through the National Environmental Policy Act (NEPA) Section 106 process. As discussed in item a, above, no resources are known to occur in the area. However, standard mitigation measures apply which are designed to reduce impacts to resources, should any be found on-site. The measure requires an immediate cessation of work, and contact with the appropriate agencies to address the resource before work can resume. Project-specific impacts are anticipated to be less than significant.

Mitigation Measures:

TCR -1: If subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction, all work shall halt within a 50-foot radius of the discovery, and the developer shall immediately notify the City of Roseville Development Services Director. The City of Roseville will notify the

consulting tribes of the discovery, and a tribal representative shall have the opportunity to determine whether or not the find represents a tribal cultural resource. If a response is not received within five days of notification, the City will deem this portion of the measure completed in good faith as long as the notification was made and documented. The developer shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology and subject to approval by the City, to evaluate the significance of the find and develop appropriate management recommendations. All management recommendations shall be provided to the City in writing for the City's review and approval. If recommended by the qualified professional and approved by the City, this may include modification of the no-work radius. The following notifications shall apply, depending on the nature of the find, subject to the review and approval of the City:

- Work may resume immediately, and no agency notifications are required if: 1) the professional archeologist determines that the find does not represent a tribal cultural resource and, if a response from a tribal representative was received within five days 2) the tribal representative determines that the find does not represent a tribal cultural resource or determines that no further action is necessary.

- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the City shall be notified immediately, to consult on a finding of eligibility and implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) that the treatment measures have been completed to its satisfaction.

- If the find represents a Native American or potentially Native American resource (including a tribal cultural resource) that does not include human remains, the consulting tribes and City shall be notified. The City will consult with the tribe(s) on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be either a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code. Preservation in place is the preferred treatment, if feasible. Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) not a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code; or 3) that the treatment measures have been completed to its satisfaction.

- If the find includes human remains, or remains that are potentially human, the construction supervisor or on-site archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641) and shall notify the City and Placer County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California Public Resources Code, and Assembly Bill 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the Public Resources Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.

XIX. Utilities and Service Systems

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves the project that it has adequate capacity to serve the project's projected demand in addition of the provider's existing commitments?				X
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to utilities and service systems is based directly on the CEQA Guidelines checklist items a–e listed above.

Discussion of Checklist Answers:

a) Minor additional infrastructure will be constructed within the project site to tie the project into the major systems, but these facilities will be constructed in locations where site development is already occurring as part of the overall project; there are no additional substantial impacts specific or particular to the minor infrastructure improvements.

b) The project is an unmanned telecommunications facility and will not generate additional water use on the project site. The City of Roseville 2015 Urban Water Management Plan (UWMP), adopted May 2016, estimates water demand and supply for the City through the year 2040, based on existing land use designations and population projections. In addition, the Amoruso Ranch Water Supply Assessment (AR WSA, Appendix E of the Amoruso Ranch FEIR), dated May 2016, estimates water demand and supply for ultimate General Plan buildout. The project is consistent with existing land use designations, and is therefore consistent with the assumptions of the UWMP and AR WSA. The UWMP indicates that existing water supply sources are sufficient to meet all near term needs, estimating an annual water demand of 45,475 acre-feet per year (AFY) by the year 2020 and existing surface and recycled water supplies in the amount of 70,421 AFY. The AR WSA estimates a Citywide buildout demand of 64,370 AFY when including recycled water, and of 59,657 AFY of potable water. The AR WSA indicates that surface water supply is sufficient to meet demand during normal rainfall years, but is insufficient during single- and multiple-dry years. However, the City's UWMP establishes mandatory water conservation measures and the use of groundwater to offset reductions in surface water supplies. Both the UWMP and AR WSA indicate that these measures, in combination with additional purchased water sources, will ensure that supply meets projected demand. The project, which is consistent with existing land use designations, would not require new or expanded water supply entitlements.

c) The proposed project does not include any facilities that would generate wastewater. There is no impact on wastewater treatment facilities as a result of this project.

d, e) The Western Placer Waste Management Authority is the regional agency handling recycling and waste disposal for Roseville and surrounding areas. The regional waste facilities include a Material Recovery Facility (MRF) and the Western Regional Sanitary Landfill (WRSL). Currently, the WRSL is permitted to accept up to 1,900 tons of municipal solid waste per day. According to the solid waste analysis of the Amoruso Ranch Specific Plan FEIR, under current projected development conditions the WRSL has a projected lifespan extending through 2058. There is sufficient existing capacity to serve the proposed project. Though the project will contribute incrementally to an eventual need to find other means of waste disposal, this impact of City buildout has already been disclosed and mitigation applied as part of each Specific Plan the City has approved, including the most recent Amoruso Ranch Specific Plan. All residences and business in the City pay fees for solid waste collection, a portion of which is collected to fund eventual solid waste disposal expansion. The project will not result in any new impacts associated with major infrastructure. The project is an unmanned telecommunications facility and will generate little to no solid waste. Environmental Utilities staff has reviewed the project for consistency with policies, codes, and regulations related to waste disposal and waste reduction regulations and policies and has found that the project design is in compliance.

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Thresholds of Significance and Regulatory Setting:

The significance of impacts related to utilities and service systems is based directly on the CEQA Guidelines checklist items a–d listed above. The California Department of Forestry and Fire Protection (CAL FIRE) is the state agency responsible for wildland fire protection and management. As part of that task, CAL FIRE maintains maps designating Wildland Fire Hazard Severity zones. The City is not located within a Very High Fire Hazard Severity Zone, and is not in a CAL FIRE responsibility area; fire suppression is entirely within local responsibility.

Discussion of Checklist Answers:

a–d) Checklist questions a–d above do not apply, because the project site is not within a Very High Fire Hazard Severity Zone and is not in a CAL FIRE responsibility area.

XXI. Mandatory Findings of Significance

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Does the project 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, substantially reduce the number or restrict the range of an endangered, threatened or rare species, or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts which 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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Significance Criteria and Regulatory Setting:

The significance of impacts related to mandatory findings of significance is based directly on the CEQA Guidelines checklist items a–c listed above.

Discussion of Checklist Answers:

a–c) Long term environmental goals are not impacted by the proposed project. The cumulative impacts do not deviate beyond what was contemplated in the General Plan EIR, and applicable mitigation measures have been incorporated with the General Plan EIR and with this project. With implementation of the City's Mitigating Ordinances, Guidelines, and Standards and best management practices, mitigation measures described in this chapter, and permit conditions, the proposed project will not have a significant impact on the habitat of any plant or animal species. Based on the foregoing, the proposed project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of any wildlife species, or create adverse effects on human beings.

ENVIRONMENTAL DETERMINATION:

In reviewing the site specific information provided for this project and acting as Lead Agency, the City of Roseville, Development Services Department, Planning Division has analyzed the potential environmental impacts created by this project and determined that with mitigation the impacts are less than significant. As demonstrated in the initial study checklist, there are no "project specific significant effects which are peculiar to the project or site" that cannot be reduced to less than significant effects through mitigation (CEQA Section 15183) and therefore an EIR ***is not*** *required. Therefore,* ***on the basis of the foregoing initial study:***

[**X**] I find that the proposed project COULD, but with mitigation agreed to by the applicant, clearly will not have a significant effect on the environment and a *MITIGATED NEGATIVE DECLARATION* has been prepared.

Initial Study Prepared by:

Shelby Vockel *7/25/2019*

Shelby Vockel, Associate Planner
City of Roseville, Development Services – Planning Division

Attachments:

1. Radio Frequency Electromagnetic Fields Exposure Report, Dtech Communications, February 4, 2019
2. Mitigation Monitoring and Reporting Program

Dtech communications

YOUR RF SAFETY PARTNER

RADIO FREQUENCY ELECTROMAGNETIC FIELDS EXPOSURE REPORT

Prepared for Verizon

c/o Epic Wireless Group LLC

Site Name: Cirby Way
Site Type: Monopine

Located at:

900 Riverside Ave.
Roseville, CA 95678
Latitude: 38.7305 / Longitude: -121.2916

Report Date: 2/4/2019
Report By: Christopher Stollar, P.E.

Based on FCC Rules and Regulations, Verizon is compliant.

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

Dtech Communications, LLC ("Dtech") has been retained by Epic Wireless Group LLC., contractors to Verizon, to determine whether its wireless communications facility complies with the Federal Communications Commission ("FCC") Radio Frequency ("RF") Safety Guidelines. This report contains a computer-simulated with an on-site visit analysis of the Electromagnetic Fields ("EMF") exposure resulting from the facility. The analysis also includes assessment of existing wireless carriers on site, where information is provided. The table below summarizes the results at a glance:

Table 1: EMF Summary

Verizon	Summary
Access Type	Gate
Access to antennas locked	Optional
RF Sign(s) @ access point(s)	None
RF Sign(s) @ antennas	None
Barrier(s) @ sectors	NA
Max EMF level for Verizon on Ground	0.5% General Population
Max EMF level for Verizon on Adjacent Roof	2.0% General Population (0.4% Occupational)
Min Clearance Distance from Face of Verizon's Antennas	42 Feet

2.0 SITE DESCRIPTION

The wireless telecommunication facility is located on the ground. The facility consists of 1 wireless carrier(s) or operator(s): Verizon. The antennas are typically grouped into sectors pointing in different directions to achieve the desired areas of coverage. Verizon's antennas will be mounted on a monopine tower and connected to the equipment via cables.

2.1 Site Map

2.2 Site Photographs

Verizon Proposed Location

Verizon Proposed Location

Verizon Proposed Location

Verizon Proposed Location

Verizon Proposed Location

Verizon Proposed Equipment Location

2.3 Antenna Inventory

Technical specifications in the table below are provided by our clients and/or gathered from physical field surveys where applicable and/or possible. Conservative estimates are used where information is not provided or available.

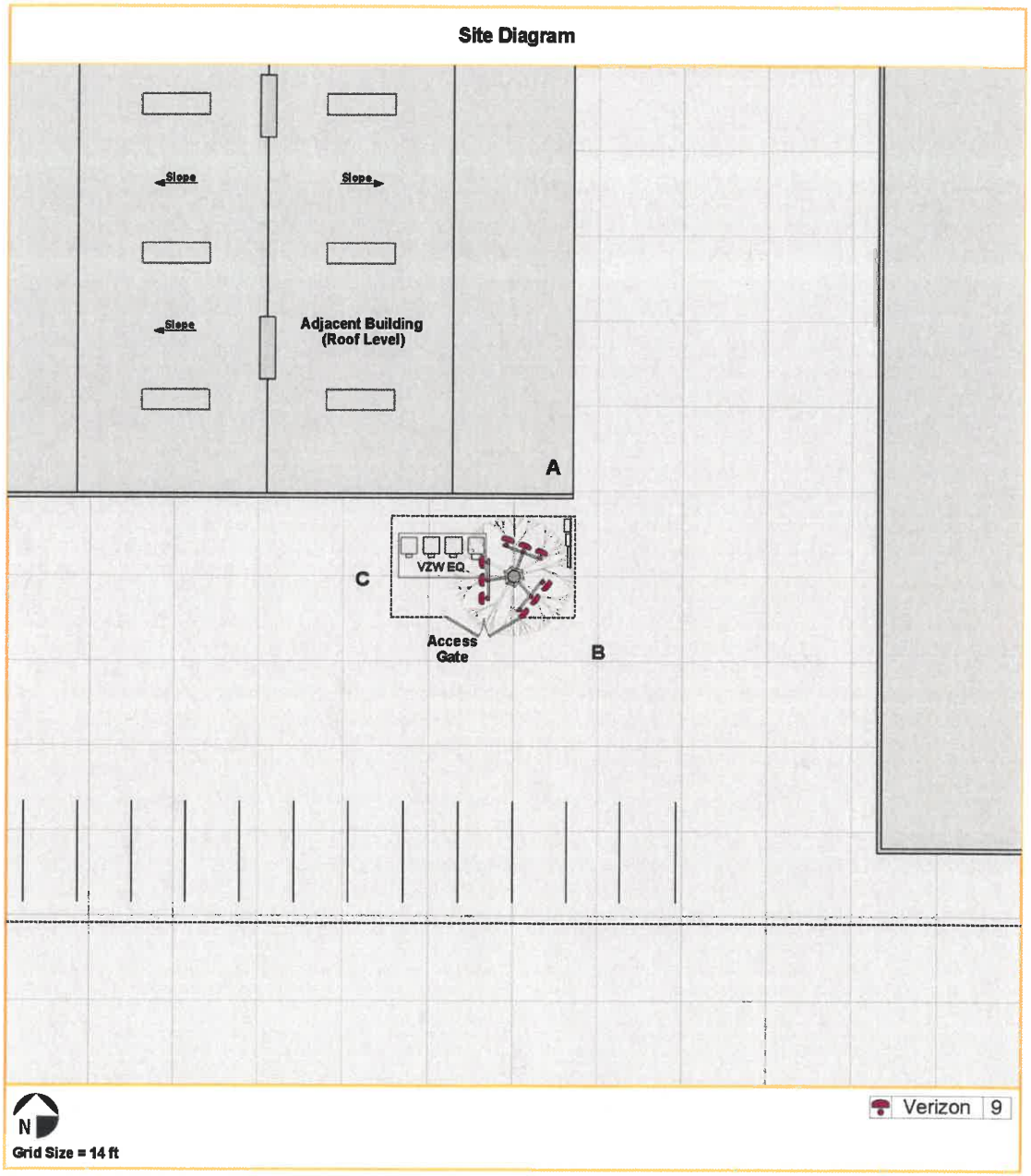
Table 2: Site Technical Specifications

Antenna ID	Operator	Antenna Mfg	Antenna Model	Type	Frequency (MHz)	Orientation (°T)	Horizontal BWdth (°)	Antenna Aperture (ft)	Antenna Gain (dBd)	Total Input Power (Watts)	Total ERP (Watts)	Bottom Tip Height Above Ground (Z) (ft)	Bottom Tip Height Above Adj. Roof (Z) (ft)	Bottom Tip Height Ant Level (Z) (ft)
A1	Verizon	Commscope	NHH-65B-R2B	Panel	746	20	65	6.0	12.3	142	2416	57.0	35.0	0.0
A1	Verizon	Commscope	NHH-65B-R2B	Panel	880	20	60	6.0	12.6	142	2582	57.0	35.0	0.0
A1	Verizon	Commscope	NHH-65B-R2B	Panel	2120	20	64	6.0	16.4	283	12450	57.0	35.0	0.0
A2	Verizon	Commscope	NHH-65B-R2B	Panel	746	20	65	6.0	12.3	142	2416	57.0	35.0	0.0
A2	Verizon	Commscope	NHH-65B-R2B	Panel	880	20	60	6.0	12.6	142	2582	57.0	35.0	0.0
A2	Verizon	Commscope	NHH-65B-R2B	Panel	1965	20	69	6.0	15.6	283	10355	57.0	35.0	0.0
A3	Verizon	Commscope	NHH-65B-R2B	Panel	2120	20	64	6.0	16.4	283	12450	57.0	35.0	0.0
B1	Verizon	Commscope	NHH-65B-R2B	Panel	746	130	65	6.0	12.3	142	2416	57.0	35.0	0.0
B1	Verizon	Commscope	NHH-65B-R2B	Panel	880	130	60	6.0	12.6	142	2582	57.0	35.0	0.0
B1	Verizon	Commscope	NHH-65B-R2B	Panel	2120	130	64	6.0	16.4	283	12450	57.0	35.0	0.0
B2	Verizon	Commscope	NHH-65B-R2B	Panel	746	130	65	6.0	12.3	142	2416	57.0	35.0	0.0
B2	Verizon	Commscope	NHH-65B-R2B	Panel	880	130	60	6.0	12.6	142	2582	57.0	35.0	0.0
B2	Verizon	Commscope	NHH-65B-R2B	Panel	1965	130	69	6.0	15.6	283	10355	57.0	35.0	0.0
B3	Verizon	Commscope	NHH-65B-R2B	Panel	2120	130	64	6.0	16.4	283	12450	57.0	35.0	0.0
C1	Verizon	Commscope	NHH-65B-R2B	Panel	746	270	65	6.0	12.3	142	2416	57.0	35.0	0.0
C1	Verizon	Commscope	NHH-65B-R2B	Panel	880	270	60	6.0	12.6	142	2582	57.0	35.0	0.0
C1	Verizon	Commscope	NHH-65B-R2B	Panel	2120	270	64	6.0	16.4	283	12450	57.0	35.0	0.0
C2	Verizon	Commscope	NHH-65B-R2B	Panel	746	270	65	6.0	12.3	142	2416	57.0	35.0	0.0
C2	Verizon	Commscope	NHH-65B-R2B	Panel	880	270	60	6.0	12.6	142	2582	57.0	35.0	0.0
C2	Verizon	Commscope	NHH-65B-R2B	Panel	1965	270	69	6.0	15.6	283	10355	57.0	35.0	0.0
C3	Verizon	Commscope	NHH-65B-R2B	Panel	2120	270	64	6.0	16.4	283	12450	57.0	35.0	0.0

3.0 ANALYSIS

3.1 Site Diagram

Figure 1: Site Diagram - Plan (bird's eye) view



3.2 Emission Predictions

Figure 2: Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits. Gray represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in gray and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.

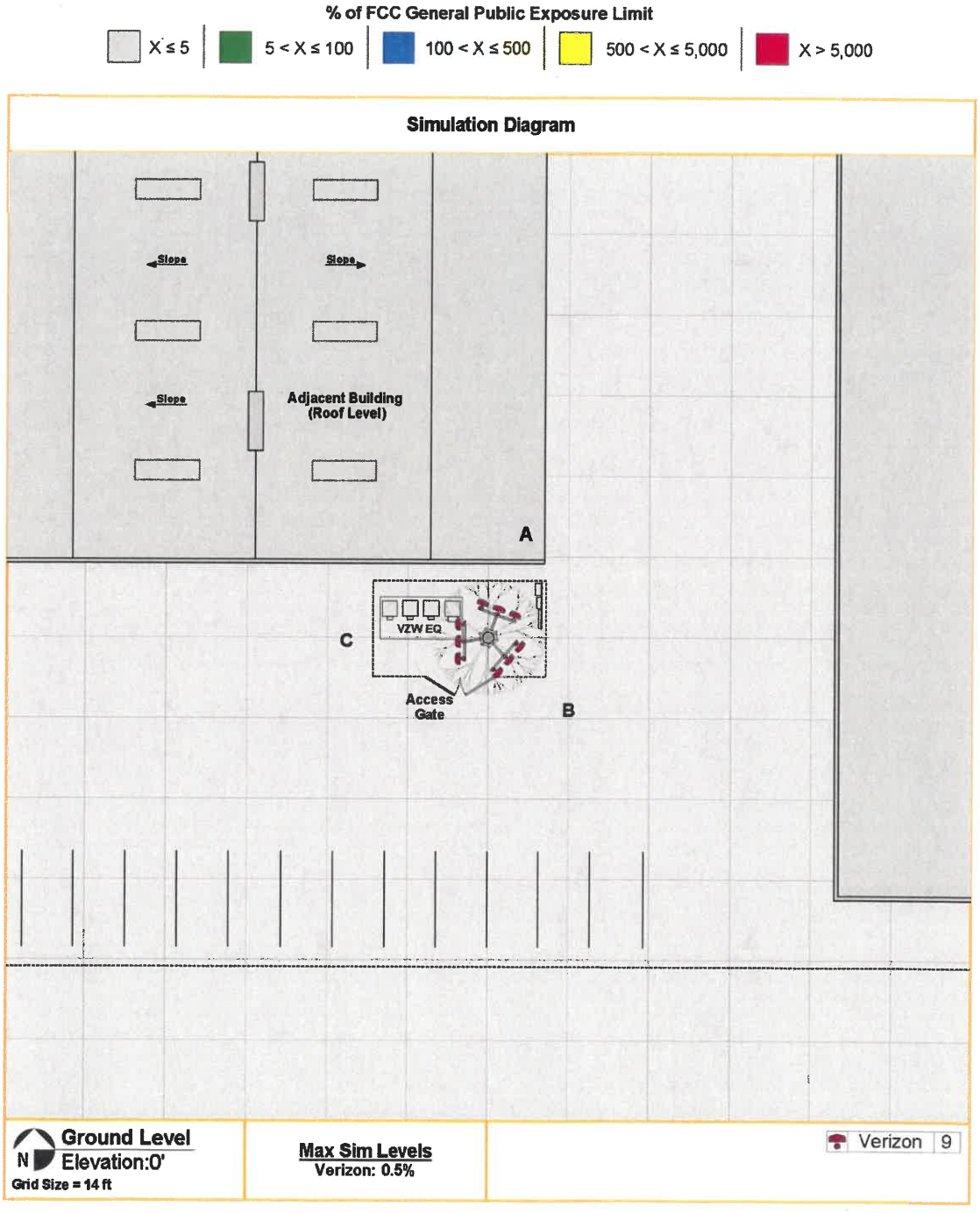


Figure 3: Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits. Gray represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in gray and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.

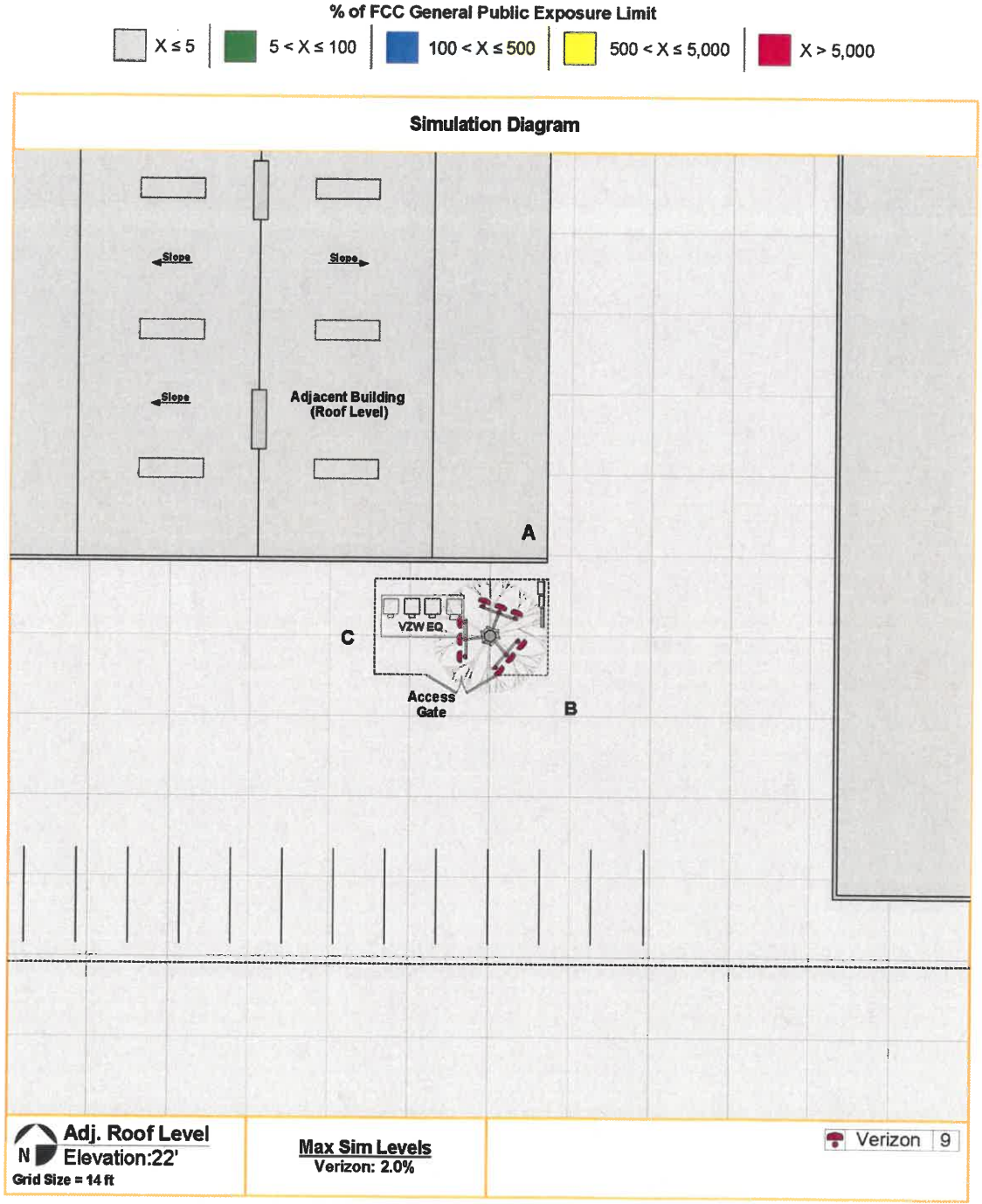
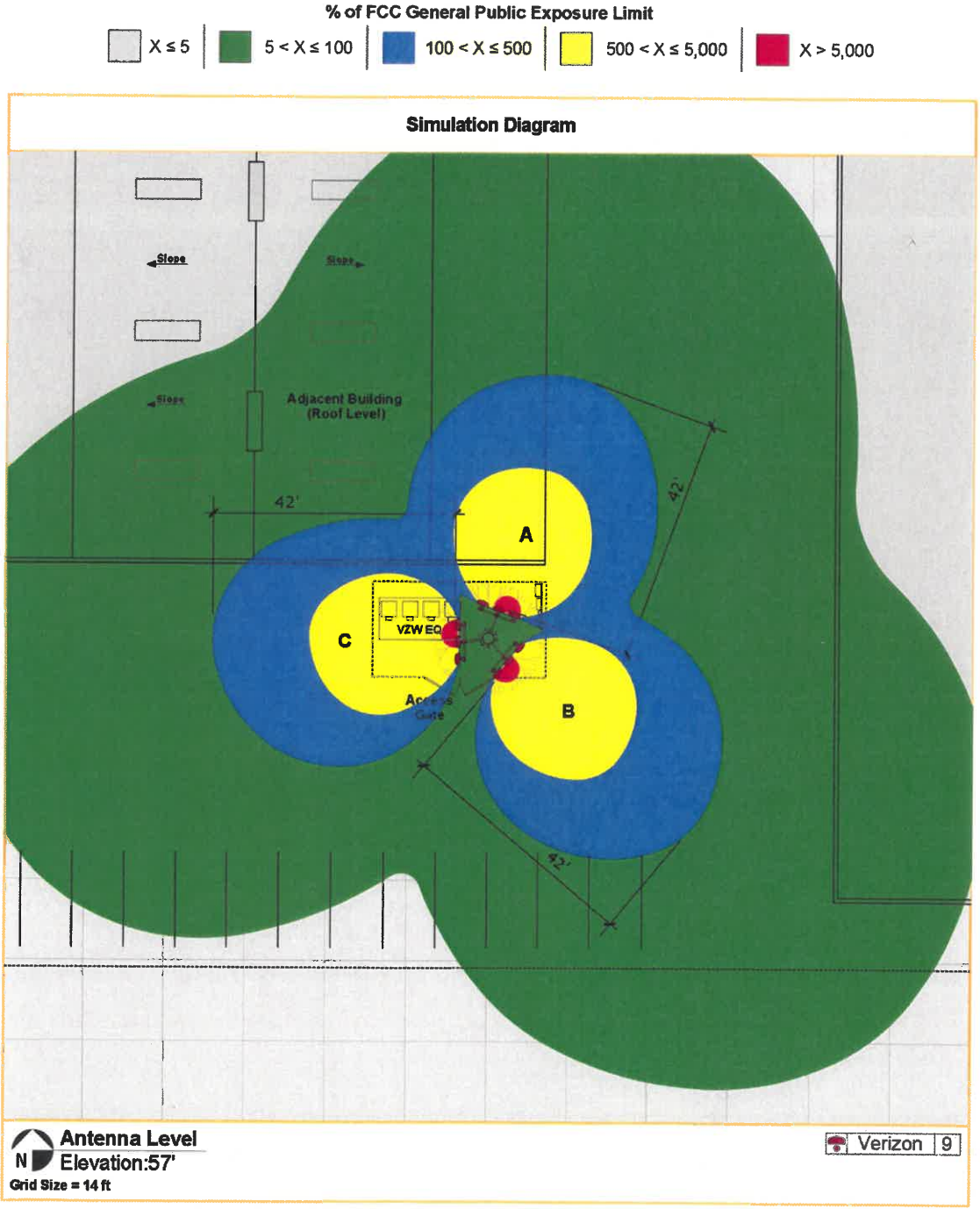


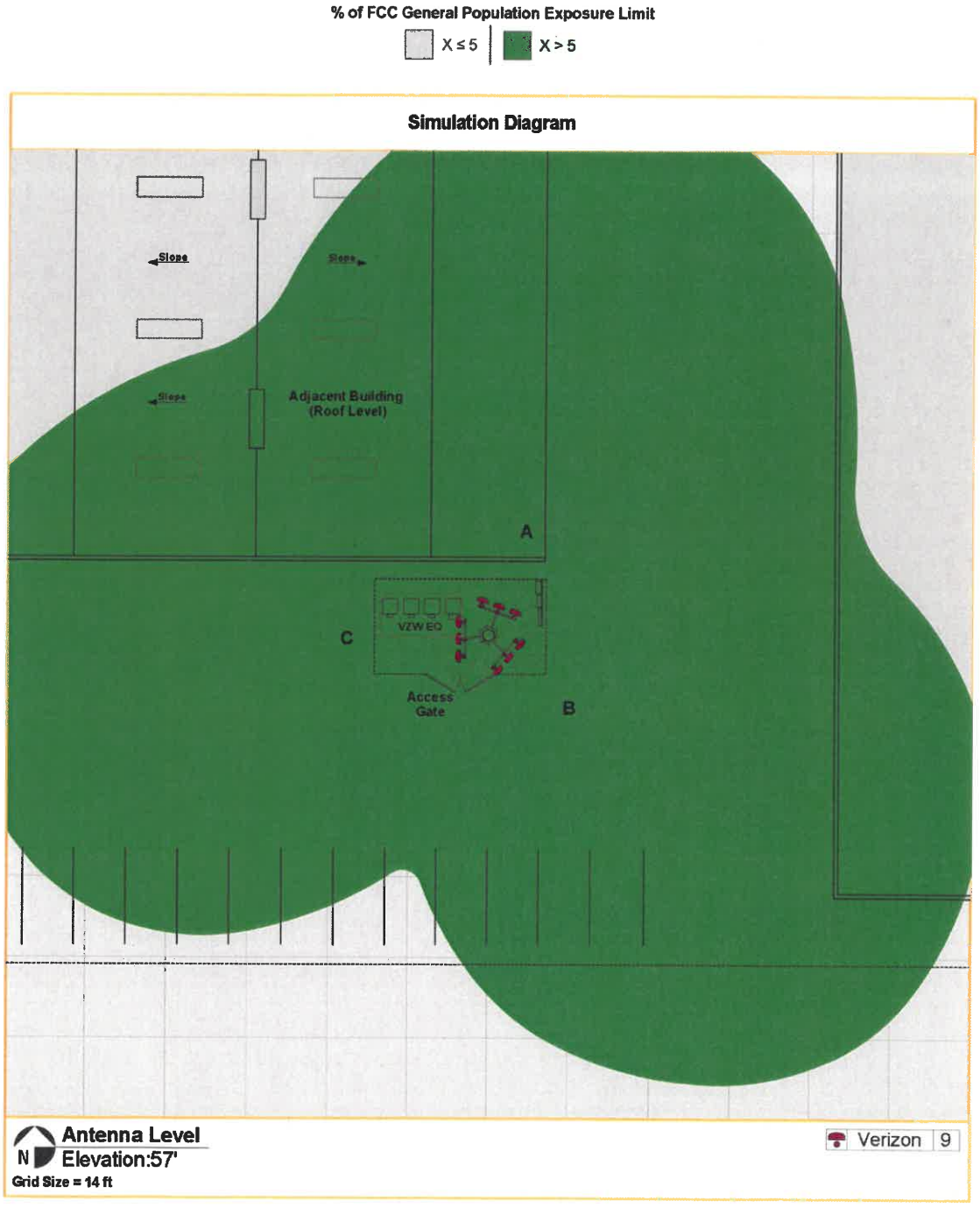
Figure 4: Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits. Gray represents areas where exposure levels are calculated to be at or below 5%; Green- between 5% & 100% (below MPE limits); blue, yellow & red – greater than 100% (exceeds MPE limits). Individuals can safely occupy areas in gray and green for indefinite amount of time; whereas areas in blue, yellow & red must be restricted to RF trained personnel who has been made fully aware of potential for exposure, has control and knows how to reduce their exposure with the use of personal protection equipment or has the ability to power down the transmitters.



3.3 Five Percent Contributions

Mitigation measures are a shared responsibility for carriers whose RF emission levels exceed five percent of the FCC's exposure limits in areas of non-compliance.

Figure 5: Plan (bird's eye) view map of results compared to FCC's General Population MPE (Maximum Permissible Exposure) Limits. Gray represents areas where exposure levels are calculated to be at or below 5%; Green – greater than 5%.



4.0 CONCLUSION

4.1 Results

For a person standing in accessible areas on the ground and adjacent roofs, calculations for Verizon's site resulted in exposure levels below the FCC's most stringent General Population MPE Limits (see figure 2-3).

At antenna elevation, the highest calculated exposure level is above the FCC's General Population MPE Limits near the Verizon antennas (see figure 4). The overexposed (red, yellow and blue) areas extend 42-feet from the front face of the Verizon antennas. From the provided drawings, there are no other buildings or surrounding structures at antenna elevation within 42-feet of the Verizon antennas. Beyond 42-feet, exposure levels are predicted to be below the FCC's most stringent General Population MPE Limits.

The antennas are mounted on a tall tower and therefore not accessible by the general public. It is presumed that Verizon employees and contractors are aware of the transmitting antennas and will take appropriate precautions when working near them.

4.2 Recommendation(s)

Further actions are not required.

4.3 Statement of Compliance

Based on the above results, analysis and recommendation(s), it is the undersigned's professional opinion that Verizon's site is compliant with the FCC's RF Safety Guidelines.

4.4 Engineer Certification

This report has been prepared by or under the direction of the following Registered Professional Engineer: Darang Tech, holding California registration number 16000. I have reviewed this report and believe it to be both true and accurate to the best of my knowledge.

Darang Tech, P.E.

Appendix A: Background

Dtech uses the FCC's guidelines described in detail in Office of Engineering & Technology, Bulletin No. 65 ("OET-65") "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields". The table below summarizes the current Maximum Permissible Exposure ("MPE") safety limits classified into two groups: General population and Occupational.

Table 3: FCC MPE Limits (from OET-65)

Frequency (Mhz)	General Population/ Uncontrolled MPE (mW/cm^2)	Averaging Time (minutes)	Occupational/ Controlled MPE (mW/cm^2)	Averaging Time (minutes)
30 - 300	0.2	30	1.0	6
300 - 1500	Frequency (Mhz)/1500 (0.2 – 1.0)	30	Frequency (Mhz)/300 (1.0 – 5.0)	6
1500 - 100,000	1.0	30	5.0	6

General population/uncontrolled limits apply in situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment, and may not be fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public always fall under this category when exposure is not employment-related.

Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment, and those persons have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled 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 population/uncontrolled limits, 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.

It is important to understand that the FCC guidelines specify *exposure* limits not *emission* limits. For a transmitting facility to be out of compliance with the FCC's RF safety guidelines an area or areas where levels exceed the MPE limits must, first of all, be in some way *accessible* to the public or to workers. When accessibility to an area where excessive levels is appropriately restricted, the facility or operation can certify that it complies with the FCC requirements.

Appendix B: Measurement and/or Computer Simulation Methods

Spatial averaging measurement technique is used. An area between 2 and 6 feet, approximately the size of an average human, is scanned in single passes from top to bottom in multiple planes. When possible, measurements were made at very close proximity to the antennas and inside the main beam where most of the energy is emitted. The spatial averaged values were recorded.

Dtech uses an industry standard power density prediction computer Model[1] to assess the worse-case, cumulative EMF impact of the surrounding areas of the subject site. The Model does not take into account losses due to buildings. Its methodologies are conservative enough to account for typical down-tilts deployed in wireless communications. In addition, the analysis is performed at 100% duty cycle-all transmitters are active at all times and transmitting at maximum power. For purposes of a cumulative study, nearby transmitters are included where possible. The result is a surrounding area map color-coded to percentages of the applicable FCC's MPE Limits. A result higher than 100% exceeds the Limits.

Appendix C: Limitations

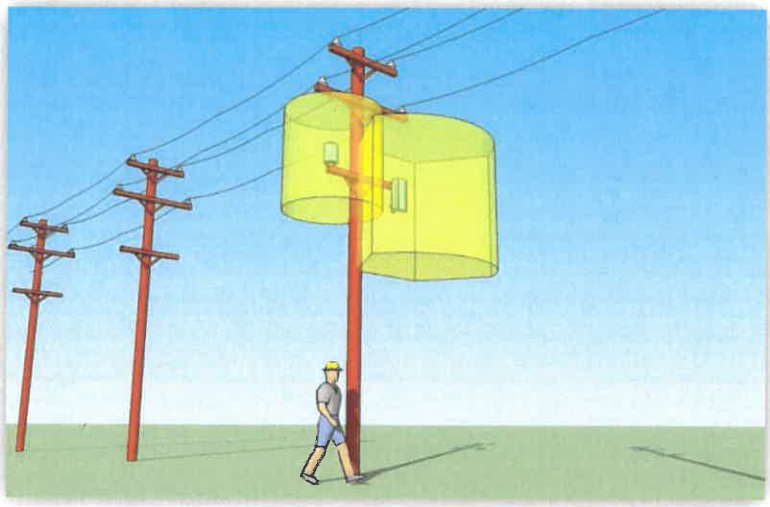
The conclusions in this document rendered by Dtech are based solely upon the information collected during the site survey and/or furnished by our Client which Dtech believes is accurate and correct. Dtech, however, has no responsibility should such Client provided information prove to be inaccurate or incorrect. Third party specification estimates used for cumulative computer simulation purposes, where applicable, are based on common industry practices and our best interpretation of available information. Data, results and conclusions in this document are valid as of its date. However, as mobile technologies continuously change, these data, results and conclusions may also be at variance with such future changes. Dtech has no responsibility to update its survey or report to account for such future technology changes. This document was prepared for the use of our Client only and cannot be utilized by any third party for any purpose without Dtech's written consent. Dtech shall have no liability for any unauthorized use of this document and any such unauthorized user shall defend, indemnify and hold Dtech and its owners, directors, officers and employees harmless from and against any liability, claim, demand, loss or expense (including reasonable attorney's fees) arising from such unauthorized use.

[1] Dtech uses Roofmaster(tm) 2015 Version 15.7.2.18 per Verizon's direction.

Appendix D: AntennaView®

Dtech Communications offers a unique, online tool (AntennaView®) to train, identify and inform individuals of site-specific HotZones – areas that may potentially exceed the FCC's Safety Limits. AntennaView® is an online, interactive training tool that will educate nontechnical people in about ten minutes. It is a site-specific, RF safety training program that requires the end user to sign an online agreement thereby limiting the liability to the landlord and carriers. Some of the advantages include:

- Virtual walk-through in 3-D with corresponding photographs
- Site-specific, interactive, simple to understand
- Delivers pertinent information i.e. HotZones (areas that may potentially exceed FCC safety limits), site owners and contact numbers.
- User online agreement = accountability

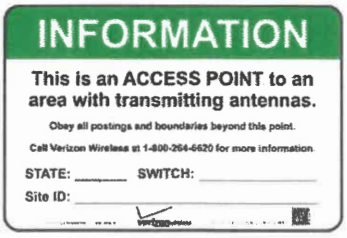


We invite you to take a quick tour at www.AntennaView.com and see how easy to understand and informative AntennaView® is.

Under Article 47 CFR § 1.1307(b), the FCC & OSHA mandates wireless operators/facility owners to have an RF survey completed including a safety plan and training to ensure that their tenants, employees and contractors who work in or around RF sites are aware of the potential risks posed by RF radiation. Most cell sites are located on building rooftops where HVAC contractors, window washers, painters, etc. routinely work and generally do not know what antennas even look like. Dtech Communications can help with ongoing FCC/OSHA compliance and provide practical training that is easy to understand by anyone regardless of their technical background.

Appendix E: Verizon's RF Advisory Signs

GUIDELINES Sign



NOC INFORMATION Sign

NOTICE Sign

CAUTION Sign

WARNING Sign

CITY OF ROSEVILLE CALIFORNIA

DEVELOPMENT SERVICES DEPARTMENT – PLANNING DIVISION
311 Vernon Street, Roseville, CA 95678 (916) 774-5276

MITIGATION MONITORING AND REPORTING PROGRAM

Project Title/File Number:	INFILL PCL 178 – Verizon Riverside Monopine/ File #PL19-0040
Project Location:	900 Riverside
Project Description:	Request for a Conditional Use Permit to construct a new 68-foot-tall monopine telecommunications facility. The tower will be located within a 30'x20' lease area with outdoor equipment, on a 4'x15' concrete slab. The lease area will be enclosed with a six-foot-tall chain link fence with privacy slats.
Environmental Document	Mitigated Negative Declaration
Project Applicant:	Celeste Magennis, Epic Wireless
Property Owner:	BMP II LLC
Lead Agency Contact Person:	Shelby Vockel, Associate Planner

Section 21081.6 of the California Public Resources Code requires public agencies to "adopt a reporting and monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." This Mitigation Monitoring and Reporting Program has been adopted for the purpose of avoiding environmental impacts

MONITORING PROCESS: Existing monitoring mechanisms are in place that assist the City of Roseville in meeting the intent of CEQA. These existing monitoring mechanisms eliminate the need to develop new monitoring processes for each mitigation measure. These mechanisms include grading plan review and approval, improvement/building plan review and approval and on-site inspections by City Departments. Given that these monitoring processes are requirements of the project, they are not included in the mitigation monitoring program.

It shall be the responsibility of the project applicant/owner to provide written notification to the City using the Mitigation Verification Cover Sheet and Forms, in a timely manner, of the completion of each Mitigation Measure as identified on the following pages. The City will verify that the project is in compliance with the adopted Mitigation Monitoring and Reporting Program. Any non-compliance will be reported by the City to the applicant/owner, and it shall be the project applicant's/owner's responsibility to rectify the situation by bringing the project into compliance. The purpose of this program is to ensure diligent and good faith compliance with the Mitigation Measures which have been adopted as part of the project.

TABLE OF MITIGATION MEASURES

Mitigation Measure	Implementation	Timing	Reviewing Party	Documents to be Submitted to City	Staff Use Only
TCR 1 - Unanticipated Discovery If subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, are discovered during construction, all work shall halt within a 50-foot radius of the discovery, and the developer shall immediately notify the City of Roseville Development Services Director. The City of Roseville will notify the consulting tribes of the discovery, and a tribal representative shall have the opportunity to determine whether or not the find represents a tribal cultural resource. If a response is not received within five days of notification, the City will deem this portion of the measure completed in good faith as long as the notification was made and documented. The developer shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology and subject to approval by the City, to evaluate the significance of the find and develop appropriate management recommendations. All management recommendations shall be provided to the City in writing for the City's review and approval. If recommended by the qualified professional and approved by the City, this may include modification of the no-work radius. The following notifications shall apply, depending on the nature of the find, subject to the review and approval of the City: • Work may resume immediately, and no agency notifications are required if: 1) the professional archeologist determines that the find does not represent a tribal cultural resource and, if a response from a tribal representative was received within five days 2) the tribal representative determines that the find does not represent a tribal cultural resource or determines that no further action is necessary. • If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the City shall be notified immediately, to consult on a finding of eligibility and implementation of appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines. Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) that the treatment measures have been completed to its satisfaction. • If the find represents a Native American or potentially Native American resource (including a tribal cultural resource) that does not include human remains, the consulting tribes and City shall be notified. The City will consult with the tribe(s) on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be either a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines, or a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code. Preservation in place is the preferred treatment, if feasible. Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the site either: 1) is not a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines; or 2) not a Tribal Cultural Resource, as defined in Section 21074 of the Public Resources Code; or 3) that the treatment measures have been completed to its satisfaction. If the find includes human remains, or remains that are potentially human, the construction supervisor or on-site archaeologist shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641) and shall notify the City and Placer County Coroner (per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California Public Resources Code, and Assembly Bill 2641 shall be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the Native American Heritage Commission, which then will designate a Native American Most Likely Descendant (MLD) for the project (§ 5097.98 of the Public Resources Code). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the Public Resources	In the event of the discovery of subsurface deposits believed to be cultural or human in origin, or tribal cultural resources, the mitigation measure shall be implemented as prescribed.	*Construction:* in the event of the discovery of subsurface deposits believed to be cultural or human in origin, or tribal cultural resources.	Planning		

Code). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (§ 5097.98 of the Public Resources Code). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work shall not resume within the no-work radius until the City, through consultation as appropriate, determines that the treatment measures have been completed to its satisfaction.					

CITY OF ROSEVILLE CALIFORNIA

DEVELOPMENT SERVICES DEPARTMENT
311 Vernon Street, Roseville, CA 95678 (916) 774-5276

MITIGATION VERIFICATION SUBMITTAL COVER SHEET

Project Title/Planning File # _____

Project Address _____

Property Owner _____

Planning Division Contact _____

SUMMARY OF VERIFICATION MATERIALS INCLUDED IN THIS SUBMITTAL

Mitigation Measure	Supporting Attachments Included	Date Complete

I HAVE ATTACHED THE FOLLOWING REQUIRED ITEMS:

☐ Table of Applicable Mitigation Measures

☐ Mitigation Verification Form(s)

☐ Specific supporting documentation required by measure(s), if applicable (e.g. biologist's report)

I hereby certify under penalty of perjury under the laws of the State of California that I am the property owner or an agent of the property owner and am authorized to submit this Mitigation Verification Form. I also certify that the above-listed mitigation measures have been completed in the manner required, and that all of the information in this submittal is true and correct, to the best of my knowledge:

_____ _____ _____

Signature and Date | Print Name | Contact Number

MITIGATION VERIFICATION FORM

Mitigation Measure

Description of Monitoring and Verification Work Performed. The following information is a required part of the description: dates, personnel names or titles, and the stage/phase of construction work. Additional notes sheets may be attached, if necessary, or the below may simply reference a separate attachment that provides the required information.

INSTRUCTIONS

COVER SHEET:

A Cover Sheet for the project/development is prepared by City staff, with the top portion filled out. Each time Mitigation Verification Forms(s) are being submitted, a Cover Sheet completed by the Developer, Contractor, or Designee is required. An example of a completed summary table is provided below. The signature on the Cover Sheet must be *original wet ink*.

EXAMPLE MITIGATION VERIFICATION SUBMITTAL COVER SHEET

Project Title/Planning File #	New Coffee Shop, PL15-0000
Project Address	10 Justashort Street
Property Owner	Jane Owner
Planning Division Contact	Joe Planner, Associate Planner, (916) 774-####

SUMMARY OF VERIFICATION MATERIALS INCLUDED IN THIS SUBMITTAL

Mitigation Measure	Supporting Attachments Included	Date Complete
MM-3	Copy of survey report signed by biologist	5/10/2016
MM-4	All information included in Mitigation Verification Form	5/12/2016
MM-5	E-mail from Air District approving Dust Control Plan	5/05/2016

MITIGATION VERIFICATION FORM:

A Mitigation Verification Form is provided by City staff, along with the Cover Sheet and Table of Applicable Mitigation Measures. A form is filled in and submitted for each mitigation measure by the Developer, Contractor, or Designee. The form needs only the mitigation number to be filled in, along with the Description of Monitoring and Verification Work Performed. Multiple forms may be submitted simultaneously, under one cover sheet. It is also permissible to submit a form for each part of a measure, on separate dates. For instance, in the example measure MM-4 in the table above, the actual mitigation requires informing construction workers *and* retaining a qualified archeologist if resources are uncovered. Thus, a developer may submit a form in May certifying that construction workers have been informed, and also submit a second copy of the form in July because resources were discovered and additional actions had to be undertaken.

Each mitigation measure specifies the type of supporting documentation required; this must be submitted in order for the City to accept the mitigation as complete. An example of a completed Mitigation Verification Form is provided below.

EXAMPLE
MITIGATION VERIFICATION FORM

Mitigation Measure MM3

Description of Monitoring and Verification Work Performed. The following information is a required part of the description: dates, personnel names or titles, and the stage/phase of construction work. Additional notes sheets may be attached, if necessary, or the below may simply reference a separate attachment that provides the required information.

The mitigation measure text is included on the Improvement Plans General Notes page (Improvement Plan EN15-0001). On May 4, 2016, prior to any ground-disturbing activities (the pre-construction phase), a site meeting was held. At this meeting, workers on the site were informed of the potential to unearth remains, and were instructed to cease work and notify their supervisor immediately if any resources were observed.