
DENNY POINT TOWER (UP-18-04)
DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

COUNTY OF SISKIYOU
806 S. MAIN STREET
YREKA, CA 96097



June 2018

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This document is an Initial Study, which concludes that a Mitigated Negative Declaration is the appropriate CEQA document for the Denny Point (UP-18-04) project. This Mitigated Negative Declaration has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, California Code of Regulations Section 15000 et seq.

An initial study is conducted by a lead agency to determine if a project may have a significant effect on the environment. In accordance with CEQA Guidelines Section 15063, an environmental impact report (EIR) must be prepared if an initial study indicates that the proposed project under review may have a potentially significant impact on the environment that cannot be initially avoided or mitigated to a level that is less than significant. A negative declaration may be prepared if the lead agency also prepares a written statement describing the reasons why the proposed project would not have a significant effect on the environment and therefore why it does not require the preparation of an EIR (CEQA Guidelines Section 15371). According to CEQA Guidelines Section 15070, a negative declaration shall be prepared for a project subject to CEQA when either:

- a) *The initial study shows there is no substantial evidence, in light of the whole record before the agency, that the proposed project may have a significant effect on the environment, or*
- b) *The initial study identifies potentially significant effects, but:*
 - (1) *Revisions in the project plans or proposals made by or agreed to by the applicant before the proposed negative declaration is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and*
 - (2) *There is no substantial evidence, in light of the whole record before the agency, that the proposed project as revised may have a significant effect on the environment.*

If revisions are adopted in the proposed project in accordance with CEQA Guidelines Section 15070(b), including the adoption of mitigation measures included in this document, a Mitigated Negative Declaration is prepared.

Additionally, CEQA provides for a number of exemptions from environmental review, including the “general rule” exemption, statutory exemptions, and categorical exemptions. CEQA Guidelines Section 15061, which details what types of projects are exempt from CEQA, states the following:

- a) *Once a lead agency has determined that an activity is a project subject to CEQA, a lead agency shall determine whether the project is exempt from CEQA.*
- b) *A project is exempt from CEQA if:*
 - (1) *The project is exempt by statute (see, e.g. Article 18, commencing with Section 15260).*

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- (2) *The project is exempt pursuant to a categorical exemption (see Article 19, commencing with Section 15300) and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2.*
- (3) *The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.*
- (4) *The project will be rejected or disapproved by a public agency. (See Section 15270(b)).*
- (5) *The project is exempt pursuant to the provisions of Article 12.5 of this Chapter.*

1.2 LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. Where two or more public agencies will be involved with a project, CEQA Guidelines Section 15051 provides criteria for identifying the lead agency. In accordance with CEQA Guidelines Section 15051(b)(1), "The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." Based on the criteria above, the County of Siskiyou (County) is the lead agency for the proposed Denny Point Tower (U-18-04).

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed Denny Point Tower (UP 18-04). This document is divided into the following sections:

1.0 Introduction – This section provides an introduction and describes the purpose and organization of the document.

2.0 Project Information – This section provides general information regarding the project, including the project title, lead agency and address, contact person, brief description of the project location, general plan land use designation, zoning district, identification of surrounding land uses, and identification of other public agencies whose review, approval, and/or permits may be required. Also listed in this section is a checklist of the environmental factors that are potentially affected by the project.

3.0 Project Description – This section provides a detailed description of the proposed project.

4.0 Environmental Checklist – This section describes the environmental setting and overview for each of the environmental subject areas, evaluates a range of impacts classified as "no impact," "less than significant," "less than significant with mitigation incorporated," and "potentially significant" in response to the environmental checklist.

5.0 References – This section identifies documents, websites, people, and other sources consulted during the preparation of this Initial Study.

1.4 EVALUATION OF ENVIRONMENTAL IMPACTS

Section 4.0, Environmental Checklist, is the analysis portion of this Initial Study. The section provides an evaluation of the potential environmental impacts of the project. There are 19 environmental issue subsections within Section 4.0, including CEQA Mandatory Findings of Significance. The environmental issue subsections, numbered 1 through 19, consist of the following:

- | | |
|---------------------------------------|--|
| 1. Aesthetics | 11. Mineral Resources |
| 2. Agriculture and Forestry Resources | 12. Noise |
| 3. Air Quality | 13. Population and Housing |
| 4. Biological Resources | 14. Public Services |
| 5. Cultural Resources | 15. Recreation |
| 6. Geology and Soils | 16. Transportation/Traffic |
| 7. Greenhouse Gas Emissions | 17. Tribal Cultural Resources |
| 8. Hazards and Hazardous Materials | 18. Utilities and Service Systems |
| 9. Hydrology and Water Quality | 19. Mandatory Findings of Significance |
| 10. Land Use and Planning | |

Each environmental issue subsection is organized in the following manner:

The **Environmental Setting** summarizes the existing conditions at the regional, subregional, and local level, as appropriate, and identifies applicable plans and technical information for the particular issue area.

The **Checklist Discussion/Analysis** provides a detailed discussion of each of the environmental issue checklist questions. The level of significance for each topic is determined by considering the predicted magnitude of the impact. Four levels of impact significance are evaluated in this Initial Study:

No Impact: No project-related impact to the environment would occur with project development.

Less Than Significant Impact: The impact would not result in a substantial adverse change in the environment. This impact level does not require mitigation measures.

Less Than Significant With Mitigation Incorporated: An impact that may have a “substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project” (CEQA Guidelines Section 15382). However, the incorporation of mitigation measures that are specified after analysis would reduce the project-related impact to a less than significant level.

Potentially Significant Impact: An impact that is “potentially significant” but for which mitigation measures cannot be immediately suggested or the effectiveness of potential mitigation measures cannot be determined with certainty, because more in-depth analysis of the issue and potential impact is needed. In such cases, an EIR is required.

2.0 PROJECT INFORMATION

1. **Project title:** Denny Point Tower (UP-18-04)
2. **Lead agency name and address:** Siskiyou County
Community Development - Planning Division
806 South Main Street
Yreka, CA 96097
3. **Contact person and phone number:** Christy Cummings Dawson, Deputy Director,
Planning
(530) 841-2100
4. **Project location:** The project site is approximately 7,000 square feet (0.16 acre) within APN 023-330-040 located near 3801 McConaughy Gulch Road, Etna, CA 96027, Siskiyou County, California; Section 31, T42N, R8W, (Latitude 41°26'57.86"N, Longitude 122°48'28.24"W).
5. **Project sponsor's name and address:** Top Sites, Inc.
C/O Louis Duenweg
P.O. Box 520
Etna, CA 96027
6. **General Plan designation:** Erosion Hazard; Soils: Severe Septic Limitations; Slope; Critical Deer Wintering Area; Wildfire Hazard
7. **Current Zoning:** Rural Residential Agricultural
Proposed Zoning: N/A
8. **Description of project:** The project is the proposed construction and operation of an 80-foot lattice communications tower (13' wide x 80') within a 70-foot by 100-foot lease area with areas for cellular equipment shelters ([4] 12'x20'), electrical back-up generators ([4] 5'x10'), cellular equipment cabinets ([1] 10'x20'), a 300 linear foot access road, and 200 linear feet of trench for new buried electrical power. Water and sewer services would not be needed at this project site.
9. **Surrounding land uses and setting:** The surrounding area consists of open woodland adjacent to an existing communications tower and Federal Aviation Administration facilities. The areas surrounding the site are also used for cattle grazing (pastureland).
10. **Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):**
 - California Department of Forestry and Fire Protection (Cal Fire)
 - Siskiyou County Air Pollution Control District (SCAPCD)
 - Federal Aviation Administration

2.0 PROJECT INFORMATION

11. Environmental factors potentially affected:

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist on the following pages.

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input checked="" type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance | | |

12. Determination: (To be completed by the lead agency)

On the basis of this initial evaluation:

- I find that the proposed project could not have an effect on the environment, and a CEQA EXEMPTION will be prepared.
- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect because recommended mitigation measures have been made by or agreed to by the project proponent that will reduce impacts to a less than significant level. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Christy Cummings Dawson
Printed Name

Deputy Director, Planning

Date

County of Siskiyou
Lead Agency

Title

3.1 PROJECT LOCATION

The 494.08-acre project parcel, with a specific site lease area of 7,000 square feet (0.16 acre), is located at 3801 McConaughy Gulch Road, Etna, California, in Siskiyou County, on APN 023-330-040; Section 31, T42N, R8W, (Latitude 41°26'57.86"N, Longitude 122°48'28.24"W) (see **Figure 3.0-1, Project Location**). The project site is accessed via a dirt road from McConaughy Gulch Road, which is approximately two miles to the south. The project site is approximately 4,788 feet above mean sea level.

3.2 EXISTING SITE CONDITIONS

The project site where the proposed improvements would be located includes the proposed 7,000 square foot lease area within APN 023-330-040 at an elevation of 4,788 feet. The project site is located within an open woodland area.

3.3 ADJACENT LAND USES

Adjacent parcels are largely undeveloped, and the closest residence is approximately 1.7 miles to the north. The community of Etna is located approximately 4.5 miles to the west. The surrounding land consists predominantly of undeveloped lands of the California High North Coast Range. To the north are woodlands. To the east, approximately 420 feet, is an existing telecommunications tower with associated equipment and structures, including graded access roads, a FAA facility with FAA very high frequency omni-directional range (VOR) antenna. Further to the east, as well as to the south and west, are undeveloped areas of grasslands and woodlands.

3.4 PROJECT OVERVIEW

The proposed project consists of the construction and operation of an 80-foot Lattice Communications Tower and associated equipment within a 70-foot by 100-foot (7,000-square-foot or 0.16 acre) lease area. Proposed associated equipment includes four (4) equipment shelters installed on 12-foot by 20-foot concrete slabs and 10-foot by 20-foot concrete slab for future equipment rack area. A new underground telco conduit would extend generally northeast from the lease area for approximately 140 feet connecting to an existing Top Sites tower equipment building. A new underground commercial power conduit would extend southeast from the lease area for approximately 135 feet connecting to an existing Top Sites Watt HR meter. In addition, a proposed access easement would extend southeast connecting with an existing access road.

Access to the site would be via an existing access road from McConaughy Gulch Road, which leads to the project parcel from the south.

3.5 PROJECT APPROVALS

The County of Siskiyou is the Lead Agency for this project. In addition, permits and/or approvals may be required from the following agencies:

California Department of Forestry and Fire Protection (Cal Fire)

Cal Fire provides wildland fire protection services to the project area, which has been identified as being located within a State Responsibility Area (SRA). Fire Safe Regulations have been

3.0 PROJECT DESCRIPTION

prepared and adopted by the state to establish minimum wildfire protection standards for development within the SRA. Fire Safe Regulations are not intended to apply to existing structures, roads, streets, private lanes, or facilities. However, these regulations are applicable to all construction activities in conjunction with the creation of new parcels, new roads, use permit, and building permit approvals within the SRA, approved after January 1, 1991.

Siskiyou County Air Pollution Control District (SCAPCD)

SCAPCD is responsible for enforcing federal, state, and local air quality regulations and ensuring that federal and state air quality standards are met within the County. These standards are set to protect the health of sensitive individuals by restricting how much pollution is allowed in the air. To meet the standards, SCAPCD enforces federal laws and state laws on stationary sources of pollution and passes and enforces its own regulations as necessary to address air quality concerns. SCAPCD has promulgated numerous rules and regulations governing the construction and operation of new or modified sources of air pollutants emissions within the air basin.

Federal Aviation Administration

A Determination of No Hazard to Air Navigation is required from the FAA under the provisions of 49 U.S.C., Section 44 718 and if applicable Title 14 of the Code of Federal Regulations, part 77.

3.6 RELATIONSHIP OF PROJECT TO OTHER PLANS

SISKIYOU COUNTY GENERAL PLAN

The proposed project is located entirely within the unincorporated area of Siskiyou County. The Siskiyou County General Plan is the fundamental document governing land use development in the unincorporated area of the county. The General Plan includes numerous goals and policies pertaining to land use, circulation, noise, open space, scenic highways, seismic safety, safety, conservation, energy, and geothermal. The General Plan Land Use Element was most recently adopted on August 12, 1980. The proposed project would be required to abide by all applicable goals and policies included in the County's adopted General Plan.

SCOTT VALLEY AREA PLAN

The project site is located within the Scott Valley Area Plan (SVAP) which was adopted on December 27, 1978. The SVAP was prepared as a grass roots attempt at managing growth and protecting the natural resources of the Scott Valley Watershed. The SVAP includes goals, policies and objectives to guide and specify where future growth in the watershed would be located. The proposed project would be required to abide by all applicable goals and policies included in the SVAP.

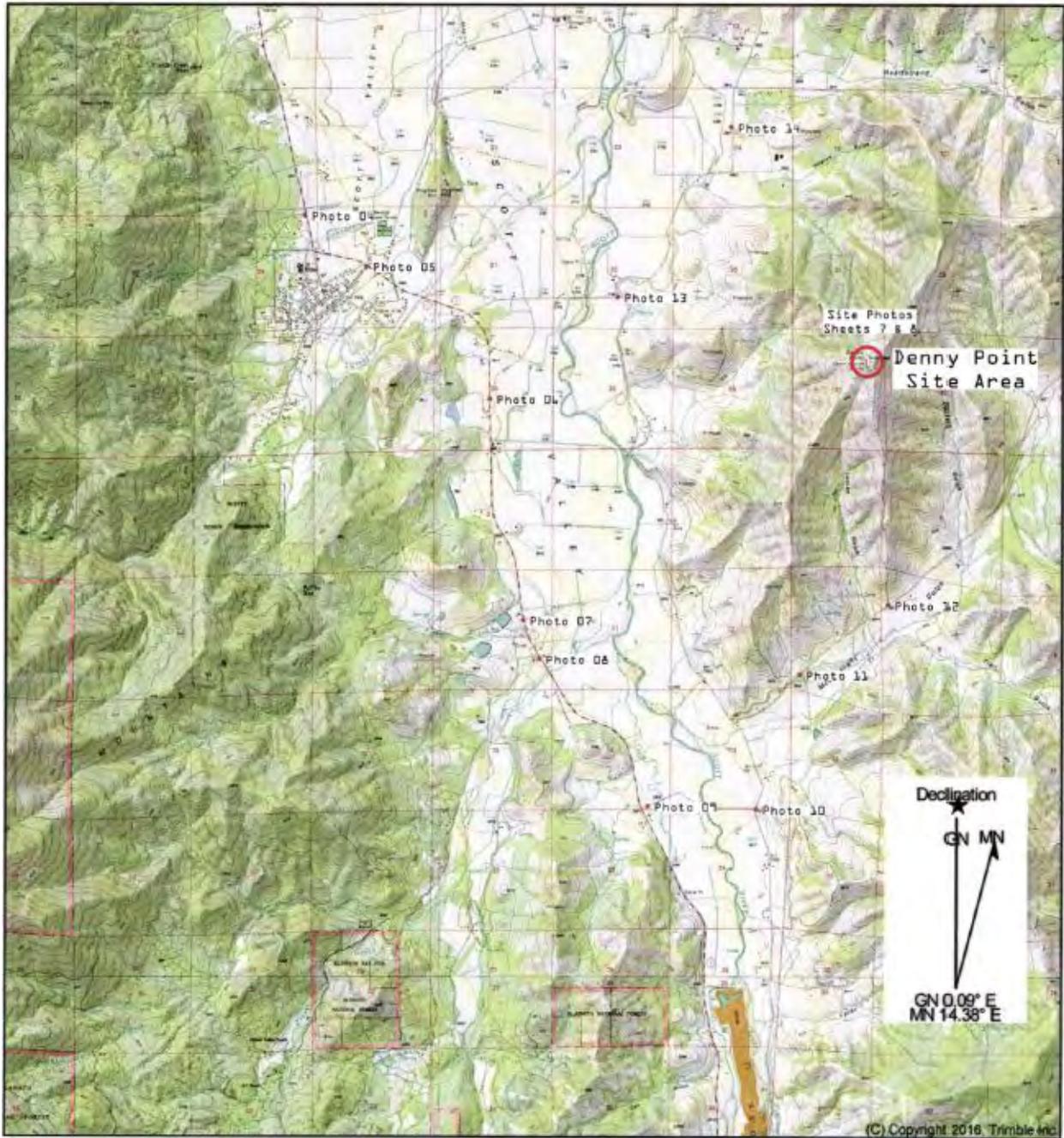


Figure 3.0-1, Project Location

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3.0 PROJECT DESCRIPTION

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4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.1 AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The project site is located approximately 19 miles west of Interstate 5 and approximately 4.5 miles east of the community of Etna. The most prominent nearby feature is Mount Shasta, a 14,179-foot dormant volcano that is visible throughout much of the region. The agricultural lands of Scott Valley area also visible in the project area.

The 7,000 square foot lease area of the project site is located approximately 82 feet below the summit of Denny Point on the west side slope. The project area is characterized and surrounded by open woodland and grasslands. Adjacent parcels are largely undeveloped, and the closest residence is approximately 1.7 miles to the north.

There are no officially designated state scenic highways in Siskiyou County (Caltrans, 2011: accessed 5/7/18); however, the County of Siskiyou Scenic Highways Element of the General Plan (Siskiyou County, 1974) designates a number of scenic freeways, highways and County highways as State Scenic Highway Master Plan designated routes. Highway 3 from Montague to the Trinity County line is a County designated route.

Discussion of Impacts:

- a) *Less than Significant Impact.* The project site is not located in a scenic area and is not part of a scenic vista. The surrounding areas consist of open woodland, grassland and small trees. Therefore, the project is not expected to have a negative impact on scenery and potential changes resulting from construction of the tower and associated equipment and facilities are considered less than significant.
- b) *No Impact.* There are no state-designated scenic highways in Siskiyou County. Additionally, no other scenic resources would be damaged as a result of the project. No impact would occur.
- c) *Less Than Significant Impact.* See Response 4.1(a). Additionally, although the existing visual character of the project site would likely see minor change as a result of construction of the tower and associated equipment and facilities, such changes would not block any views

from the site or surrounding areas. As a result, visual changes to the project site from the tower would be less than significant.

- d) *No Impact*. The proposed project is not expected to result in any glare at any time and the equipment shelters would have a khaki brown finish on all outside walls. The facilities would not include high intensity white lights. No impact would occur.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>4.2 AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997), prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resource Board. Would the project:</p>				
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 nonagricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The project site and surrounding lands are zoned for Agriculture. There are no agricultural lands at or adjacent to the project site; however, according to the California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), the project site is designated Farmland of Local Importance (California Department of Conservation 2017). Adjacent lands are designated Grazing land. The project site and surrounding parcels are under Williamson Act contract (California Department of Conservation 2016).

Discussion of Impacts:

- a) *No Impact.* As identified on the 2016 Siskiyou County Important Farmland Map published by the California Department of Conservation's FMMP, the project site and surrounding land is designated Farmland of Local Importance. Therefore, the proposed project would not

convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use.

- b) *Less than Significant Impact.* The project site is zoned Rural Residential Agriculture, is subject to a Williamson Act contract and is located near other contracted lands. However, the proposed project would not conflict with the Williamson Act or result in the cancellation of the contract. Cell towers are permitted with a Use Permit in Agriculturally zoned parcels in Siskiyou County and are considered a compatible use under Williamson Act contracts in Siskiyou County. The impact is less than significant.
- c) *No Impact.* The project would not involve any development or changes to the environment that would conflict with existing zoning or cause rezoning of forest land, because the project site is not forest land, is zoned for agricultural use and this is not proposed to change.
- d) *No Impact.* According to the U.S. Department of Agriculture (USDA), the project site is not classified as forest lands pursuant to PRC Section 12220(g). Therefore, the project would not result in the loss of forest land or conversion of forest land to non-forest use.
- e) *No Impact.* See subsections (a-d), above. The project site is not located on farmland and only one juniper tree (*Juniperus* sp.) would be removed, which is currently located in the center of the project site.

Mitigation Measures:

None required.

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.3 AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The project site is located in a region identified as the Northeast Plateau Air Basin (NEPAB), which principally includes Siskiyou, Modoc, and Lassen counties. This larger air basin is divided into local air districts, which are charged with the responsibility of implementing air quality programs. The local air quality agency affecting the project area is the Siskiyou County Air Pollution Control District (SCAPCD). Within the SCAPCD, the primary sources of air pollution are wood burning stoves, wildfires, farming operations, unpaved road dust, managed burning and disposal, and motor vehicles.

As noted above, the SCAPCD is the local air quality agency with jurisdiction over the project site. The SCAPCD adopts and enforces controls on stationary sources of air pollutants through its permit and inspection programs and regulates agricultural and non-agricultural burning. Other SCAPCD responsibilities include monitoring air quality, preparing air quality plans, and responding to citizen air quality complaints.

Ambient Air Quality Standards

Air quality standards are set at both the federal and state levels of government (**Table 4.3-1**). The federal Clean Air Act requires the Environmental Protection Agency (EPA) to establish ambient air quality standards for six criteria air pollutants: ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, lead, and suspended particulate matter. The California Clean Air Act also sets ambient air quality standards. The state standards are more stringent than the federal standards, and they include other pollutants as well as those regulated by the federal standards. When the concentrations of pollutants are below the allowed standards within an area, that area is considered to be in attainment of the standards.

**Table 4.3-1
Federal and State Ambient Air Quality Standards**

Pollutant	Averaging Time	Federal Primary ¹	Federal Secondary ¹	California ²
Ozone	8 Hour	0.07 ppm	0.07 ppm	0.07 ppm
	1 Hour	--	--	0.09 ppm
Carbon Monoxide	8 Hour	9 ppm	--	9 ppm
	1 Hour	35 ppm	--	20 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.053 ppm	0.03 ppm
	1 Hour	100 ppb	--	0.18 ppm
Sulfur Dioxide	Annual	0.03 ppm	--	--
	24 Hour	0.14 ppm	--	0.04 ppm
	3 Hour	--	0.5 ppm	--
	1 Hour	75 ppb	--	0.25 ppm
Fine Suspended Particulate Matter (PM2.5)	Annual	12.0 µg/m ³	15.0 µg/m ³	12 µg/m ³
	24 Hour	35.0 µg/m ³	35.0 µg/m ³	--
Suspended Particulate Matter (PM10)	Annual	--	--	20 µg/m ³
	24 Hour	150 µg/m ³	150 µg/m ³	50 µg/m ³
Sulfates	24 Hour	--	--	25 µg/m ³
Lead	30 Day	--	--	1.5 µg/m ³
	Calendar Qtr	1.5 µg/m ³	1.5 µg/m ³	--
Hydrogen Sulfide	1 Hour	--	--	0.03 ppm
Vinyl Chloride	24 Hour	--	--	0.01 ppm
Visibility-Reducing Particles	8 Hour (10 am - 6 pm PST)	--	--	(³)

Source: California Air Resources Board, 2016

¹ National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public

National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.

² California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter - PM₁₀, PM_{2.5}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

³ Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.

Air Quality Monitoring

Ozone (hourly and 8-hour average) and particulate matter 2.5 (PM_{2.5}) are the only contaminants that receive continuous monitoring in Siskiyou County. PM_{2.5} is monitored every six days using the Federal Reference Method. The SCAPCD also monitors acid rain and has one rain gauge and precipitation collector near the Siskiyou County Airport. A new collection bucket is installed every Tuesday. Precipitation samples are sent to the National Atmospheric Deposition Program National Trends Network for analysis and reporting.

The closest SCAPCD air quality monitoring station to the project site is located in the City of Yreka approximately 21 miles north-northwest of the project site. This station monitors ozone and

4.0 ENVIRONMENTAL CHECKLIST

particulate matter (PM_{2.5}). **Table 4.3-2** shows ozone and particulate matter from monitoring efforts from 2014 - 2016 at the Yreka station.

Table 4.3-2
Siskiyou County Air Quality Data

Pollutant	Standard	Year		
		2014	2015	2016
<i>Ozone (O₃)</i>				
Maximum 1-Hour Concentration (ppm)		0.082	0.076	0.092
Maximum 8-Hour Concentration (ppm)		0.066	0.067	0.069
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	0	0	0
Number of Days Exceeding State/Federal 8-Hour Standard	> 0.07 ppm	0	0	0
<i>Inhalable Particulates (PM₁₀)¹</i>				
Maximum 24-Hour Concentration (µg/m ³)		90.6	65.5	*
Estimated No. of Days Exceeding State Standard	> 50 µg/m ³	*	6.1	*
Estimated No. of Days Exceeding Federal Standard	> 150 µg/m ³	0	0	*
<i>Ultra-Fine Particulates (PM_{2.5})</i>				
Maximum 24-Hour Concentration (µg/m ³)		71.9	51.0	25.1
Estimated No. of Days Exceeding Federal 24-Hour Standard	> 35 µg/m ³	*	*	0

Source: California Air Resources Board, 2017

¹ Siskiyou County is no longer required to monitor PM₁₀.

* Insufficient data

Monitored Air Pollutants

Ozone is a gas comprised of three oxygen atoms. It occurs both in the earth's upper atmosphere and at ground level. Ozone can be either beneficial or detrimental to human health, depending on its concentration and where it is located. Beneficial ozone occurs naturally in the earth's upper atmosphere, where it acts to filter out the sun's harmful ultraviolet rays. Bad ozone occurs at ground level and is created when cars, industry, and other sources emit pollutants that react chemically in the presence of sunlight. Ozone exposure can result in irritation of the respiratory system, decreased lung function, aggravated asthma, and possible lung damage with persistent exposure.

PM₁₀ (i.e., suspended particulate matter less than 10 microns) is a major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited.

PM_{2.5} (i.e., suspended particulate matter less than 2.5 microns) is similar to PM₁₀ in that it is an air contaminant that consists of tiny solid or liquid particles; though in this case the particles are about 0.0001 inches or smaller (often referred to as fine particles). PM_{2.5} is typically formed in the atmosphere from primary gaseous emissions that include sulfates emitted by power plants and industrial facilities and nitrates emitted by power plants, automobiles, and other types of

combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions.

Inhalation of PM₁₀ and PM_{2.5} can cause persistent coughing, phlegm, wheezing, and other physical discomfort. Long-term exposure may increase the rate of respiratory and cardiovascular illness.

As shown in **Table 4.3-2** above, neither the project site nor Siskiyou County have been identified as having significant air quality problems and are considered to be in attainment or unclassified for all federal and state air quality standards. As a result, the County is not subject to an air quality attainment or maintenance plan.

Discussion of Impacts:

- a) *No Impact.* Siskiyou County is classified as being in attainment or unclassified for all federal and state air quality standards and, as a result, is not subject to an air quality plan.
- b) *Less Than Significant Impact.* See Response 4.3(a) above. While particulate matter (i.e., dust) and diesel emissions could be generated during construction of the tower and associated equipment and facilities, the amount of construction emissions likely to be generated is minor. Further, construction emissions would be temporary and cease once construction is complete. As a result, there would not be a violation of air quality standards associated with the project nor would project-related emissions contribute substantially to an existing or projected air quality violation.
- c) *Less Than Significant Impact.* See Responses 4.3(a) and 4.3(b) above. Any air contaminants likely to be generated as a result of future maintenance and repair vehicles entering the site would have a negligible impact on the County's ability to meet federal and state air quality standards.
- d) *Less Than Significant Impact.* Sensitive receptors are generally defined as facilities that house or attract groups of children, the elderly, persons with illnesses, and others who are especially sensitive to the effects of air pollutants. Schools, hospitals, residential areas, and senior care facilities are examples of sensitive receptors. The project site is near the top of Denny Point in an undeveloped open woodland area. The closest residence is approximately 1.7 miles to the north. Land disturbance would be limited to cut and fill activities on the 7,000 square foot site, including clearing for the concrete slabs for the tower, equipment shelters, and generators. Due to the limited foreseeable land disturbance, potential for erosion based on soil types, and the existence of groundcover, brush, trees, and distance to rural residential development, dust from erosion or wind is considered less than significant. Additionally, potential diesel emissions during construction are considered negligible. Therefore, the impact would be less than significant impact.
- e) *Less Than Significant Impact.* Offensive odors rarely cause any physical harm; however, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Odor impacts on residential areas and other sensitive receptors, such as daycare centers and schools, are of particular concern. Major sources of odor-related complaints by the general public commonly include wastewater treatment facilities, landfill disposal facilities, food processing facilities, agricultural activities, and various industrial activities (e.g., petroleum refineries, chemical and fiberglass manufacturing, painting/coating operations, feed lots/dairies, composting facilities, landfills, and transfer stations).

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The proposed project would not generate offensive odors as the project is limited to construction of the tower and associated equipment and facilities. Temporary, localized odors during construction of the proposed project may occur. Odors would be generated by tailpipe emissions from diesel-powered construction equipment and would be unlikely to affect a substantial number of residences due to the distance to the nearest residences. Any odors would not present for an extended period of time. Accordingly, potential odor impacts are considered less than significant.

Mitigation Measures:

None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.4 BIOLOGICAL RESOURCES. Would the project:				
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 US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal wetlands, etc.), through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and the California Native Plant Society (CNPS) document species that may be rare, threatened or endangered. Federally listed species are fully protected under the mandates of the Federal Endangered Species Act (FESA). "Take" of listed species incidental to otherwise lawful activity may be authorized by either the USFWS or the National Marine Fisheries Service (NMFS), depending upon the species.

Under the California Endangered Species Act (CESA), CDFW has the responsibility for maintaining a list of threatened and endangered species. CDFW also maintains lists of "candidate species" and "species of special concern" which serve as "watch lists." State-listed species are fully protected under the mandates of CESA. "Take" of protected species incidental

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to otherwise lawful management activities may be authorized under Section 2081 of the Fish and Game Code of California.

Under Section 3503.5 of the California Fish and Game Code, it is unlawful to take, possess, or destroy any birds in the orders of Falconiformes or Strigiformes (i.e., raptors) or to take, possess or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.

The Native Plant Protection Act (California Fish and Game Code Sections 1900-1913) prohibits the taking, possessing, or sale within the state of any rare, threatened or endangered plants as defined by the CDFW. Project impacts on these species would not be considered significant unless the species are known to have a high potential to occur within the area of disturbance associated with the project.

Special-Status Species

Special-status species are commonly characterized as species that are at potential risk or actual risk to their persistence in a given area or across their native habitat (locally, regionally, or nationally) and are identified by a state and/or federal resource agency as such. These agencies include governmental agencies such as CDFW, USFWS, or private organizations such as CNPS. The degree to which a species is at risk of extinction is the limiting factor on a species' status designation. Risk factors to a species' persistence or population's persistence include habitat loss, increased mortality factors (take, electrocution, etc.), invasive species, and environmental toxins. In context of environmental review, special-status species are defined by the following codes:

- 1) Listed, proposed, or candidates for listing under the federal Endangered Species Act (50 Code of Federal Regulations [CFR] 17.11 – listed; 61 Federal Register [FR] 7591, February 28, 1996 candidates);
- 2) Listed or proposed for listing under the California Endangered Species Act (Fish and Game Code [FGC] 1992 Section 2050 et seq.; 14 California Code of Regulations [CCR] Section 670.1 et seq.);
- 3) Designated as Species of Special Concern by the CDFW;
- 4) Designated as Fully Protected by the CDFW (FGC Sections 3511, 4700, 5050, 5515); and
- 5) Species that meet the definition of rare or endangered under the California Environmental Quality Act (CEQA) (14 CCR Section 15380) including CNPS List Rank 1b and 2.

The project application was sent to CDFW staff in 2018 for review, and CDFW responded that the agency had no comments on the proposed project. In addition, critical habitat designations within the general vicinity of the project site were checked using the USFWS Critical Habitat Portal (USFWS, 2018: accessed May 15, 2018); according to USFWS, no critical habitats have been identified within or adjacent to the project site.

On December 13, 2017, a Trileaf Biologist surveyed the project site to conduct an Informal Biological Assessment (Trileaf, 2017). The purpose was to document whether the proposed project would affect listed or proposed threatened or endangered species, designated critical habitats, wetlands, and migratory birds.

Discussion of Impacts:

- a) *Less Than Significant Impact.* CDFW did not have any comments on the project application regarding the potential for biological resources at the project site. The Informal Biological Assessment (Trileaf, 2017). concluded that the proposed project would have no potential to have a significant effect on listed or proposed, threatened and endangered species, their designated critical habitat, or migratory birds. Additionally, the USFWS Critical Habitat Portal did not identify any critical habitat in the project area. Therefore, the impact is less than significant.
- b) *No Impact.* The project site is near the top of Denny Point. There is no riparian habitat or other sensitive natural community in the project vicinity. (Trileaf, 2017)
- c) *No Impact.* The Informal Biological Assessment concluded, based on site reconnaissance, review of the relevant USGS 7.5-minute topographic map titled "McConaughy Gulch" Quadrangle, California, and review of the relevant USFWS National Wetlands Inventory Map that there are no federally designated wetlands on or in the immediate vicinity of the project site. The site assessment also did not reveal any evidence of potential wetlands or hydrophytic vegetation located on or in the immediate vicinity of the project site. A review of the United States Department of Agriculture (USDA) Soil Survey did indicate hydric soils at the project site, however, no surface water was observed during the area reconnaissance. (Trileaf, 2017)
- d) *Less Than Significant Impact.* Migratory birds are known to occur in the vicinity of the project area and are likely to pass through the project area. However, there is no evidence that the proposed project site is used for nesting, and the removal of one Juniper tree and the development of the 7,000 square foot site is not likely to substantially interfere with the movement of migratory birds or other animals.
- e) *No Impact.* The proposed project would be consistent with the County General Plan policies and zoning applied to the site and therefore would not conflict with any local policies or ordinances protecting biological resources.
- f) *No Impact.* CDFW adopted a Conservation Plan for Gray Wolves in California in 2016, which covers the project site. No aspect of the proposed project would conflict with this conservation plan because the project would not affect the gray wolves' habitat or movement.

Mitigation Measures:

None required.

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.5 CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Setting:

CEQA Guidelines Section 15064.5 defines the term “historical resources.” Generally speaking, a “historical resource” includes sites that are listed in or determined to be eligible for listing in the California Register of Historical Resources, sites that are included in a local register of historical resources, or a resource that is considered “historically significant.” A lack of designation at the national, state, or local level does not preclude a resource from being determined to be a historical resource.

Discussion of Impacts:

- a) *Less Than Significant With Mitigation Incorporated.* A cultural resources investigation was prepared for the project by Archaeological Resources Technology (ART) in December 2017, followed by a revised cultural resources investigation in January 2018 (Archaeological Resources Technology, 2017, 2018). The cultural resources investigations concluded that there are no historic properties within the direct and indirect area of potential effect (APE). However, ground disturbance associated with development of the site has the potential to impact subsurface historic resources should any be present. Therefore, mitigation measure **MM 5.1** is provided to address the potential for the discovery of any unrecorded or previously unknown historic resources.
- b) *Less Than Significant With Mitigation Incorporated.* While no evidence of archaeological resources has been identified within the APE, ground disturbance has the potential to impact subsurface archaeological resources should any be present. Therefore, mitigation measure **MM 5.1** is included to address the potential for the discovery of any unrecorded or previously unknown resources.
- c) *Less Than Significant With Mitigation Incorporated.* There are no records of paleontological resources being discovered within or immediately adjacent to the project site. Nevertheless, unanticipated and accidental discoveries of paleontological resources are possible as future development of the project site occurs. Therefore, in order to ensure that potential

impacts to paleontological resources remain less than significant, mitigation measure **MM 5.2** is provided below.

- d) *Less Than Significant With Mitigation Incorporated.* There is no record of Native American or early European burial sites within or adjacent to the project site. Regardless, there is a possibility of the unanticipated and accidental discovery of human remains during ground-disturbing project-related activities. Therefore, mitigation measure **MM 5.3** is provided below to address the potential discovery of any unrecorded or previously human remains.

Mitigation Measures:

MM 5.1 If, during the course of project implementation, cultural resources (i.e., prehistoric sites, historic features, isolated artifacts, and features such as concentrations of shell or glass) are discovered, all work shall cease in the area of the find, the Siskiyou County Community Development Department – Planning Division shall be immediately notified, and a professional archaeologist that meets the Secretary of the Interior’s Professional Qualifications Standards in prehistoric or historical archaeology shall be retained to determine the significance of the discovery. The County shall consider mitigation recommendations presented by a professional archaeologist and implement a measure or measures that the County deems feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.

Timing/Implementation: During ground disturbance activities associated with development of the site.

Enforcement/Monitoring: Siskiyou County Community Development Department - Planning Division

MM 5.2 If, during the course of project implementation, paleontological resources (e.g., fossils) are discovered, all work shall cease in the area of the find, the Siskiyou County Community Development Department – Planning Division shall be immediately notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. The County shall consider the mitigation recommendations presented by a professional paleontologist and implement a measure or measures that the County deems feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures.

Timing/Implementation: During ground disturbance activities associated with development of the site.

Enforcement/Monitoring: Siskiyou County Community Development Department - Planning Division

MM 5.3 If, during the course of project implementation, human remains are discovered, all work shall cease in the area of the find, the Siskiyou County Community Development Department – Planning Division shall be immediately notified, and the County Coroner must be notified, according to Section 5097.98 of the California Public Resources Code and Section 7050.5 of the California Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in California Code of Regulations Section 15064.5(d) and (e) shall be followed.

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Timing/Implementation: During ground disturbance activities associated with development of the site.

Enforcement/Monitoring: Siskiyou County Community Development Department - Planning Division

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.6 GEOLOGY AND SOILS. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

As indicated on the 2010 Fault Activity Map of California (California Department of Conservation, 2010; accessed May 8, 2018), there are several faults located in the region. The closest of these runs in a north-south axis just to the east of the project site. Additional faults are located farther to the west and east. None of these faults, however, have shown evidence of displacement in over 1.6 million years. The nearest potentially active faults (i.e., faults along which displacement has occurred within the past 200 years) are located in the Cedar Mountain Fault Zone approximately 46 miles east of the project site. The largest earthquake originating along this fault zone in recent times had a magnitude of 4.6 and occurred in August 1978 (U.S. Geological Survey, 2015).

The Seismic Safety and Safety Element of the Siskiyou County General Plan states that over a 120-year period, nine or ten earthquakes capable of “considerable damage” have occurred in

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the region. No deaths have been reported from these quakes and building damage was considered minor or unreported. Regardless, Siskiyou County, like much of California, is located in an area with potential for major damage from earthquakes corresponding to intensity VII on the Modified Mercalli Scale.

Standard construction practices limit the amount of potential erosion, and the California Building Code addresses necessary construction techniques to accommodate soils with expansive characteristics.

Discussion of Impacts:

a)

- i) *Less Than Significant Impact.* According to the California Geological Survey website (CGS Information Warehouse: Regulatory Maps), there are no Alquist-Priolo Earthquake faults in the project vicinity. The closest mapped Alquist-Priolo Earthquake fault is several miles east of Mount Shasta (California Department of Conservation, 2015, accessed May 8, 2018). Additionally, the project does not include any structures for human occupancy.
- ii) *Less Than Significant Impact.* According to the County's *Seismic Safety and Safety Element* of the General Plan (Siskiyou County, 1975: page 3), generally, Siskiyou County is an area of low seismic activity within recent times although the County was at one time very active seismically. Numerous faults cross the landscape, but most show insignificant recent, if any, disturbance. The tower and associated equipment and facilities would be built and maintained in compliance with standards contained in state or local building codes to address seismic ground shaking.
- iii) *Less Than Significant Impact.* Liquefaction occurs when loose sand and silt that is saturated with water behaves like a liquid when shaken by an earthquake. Liquefaction can result in the following types of seismic-related ground failure:
 - Loss of bearing strength – soils liquefy and lose the ability to support structures
 - Lateral spreading – soils slide down gentle slopes or toward stream banks
 - Flow failures – soils move down steep slopes with large displacement
 - Ground oscillation – surface soils, riding on a buried liquefied layer, are thrown back and forth by shaking
 - Flotation – floating of light buried structures to the surface
 - Settlement – settling of ground surface as soils reconsolidate
 - Subsidence – compaction of soil and sediment

Three factors are required for liquefaction to occur: (1) loose, granular sediment; (2) saturation of the sediment by groundwater; and (3) strong shaking. Impacts associated with liquefaction are unlikely given the excessively drained soils on the project site and low incidence of seismic activity in the region.

- iv) *Less Than Significant Impact.* Because landslides are not prevalent in the area, the potential for landslides is considered low.

- b) *Less Than Significant Impact.* The proposed project would include cut and fill activities to level the project site and would create minimal impervious surfaces, so it would not result in substantial soil erosion or loss of topsoil.
- c) *Less Than Significant Impact.* The potential for landslides on the project site is addressed under Response 4.6(a)(iv) and determined to be less than significant. The potential for lateral spreading, liquefaction, subsidence, and other types of ground failure or collapse is addressed under Response 4.6(a)(iii) and also determined to be less than significant.
- d) *Less Than Significant Impact.* Expansive or shrink-swell soils are soils that swell when subjected to moisture and shrink when dry. Expansive soils typically contain clay minerals that attract and absorb water, greatly increasing the volume of the soil. This increase in volume can cause damage to foundations, structures, and roadways. The soils at the project site are considered to have low shrink-swell potential. In addition, the proposed project is an unmanned tower and associated equipment and facilities that would not pose risk to life.
- e) *No Impact.* The proposed project does not require a septic tank or any wastewater disposal systems because the tower would be unmanned and would not produce any sewage or wastewater.

Mitigation Measures:

None required.

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.7 GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The air district has not identified a significance threshold for greenhouse gas (GHG) emissions generated by a proposed project, or a methodology for analyzing impacts related to GHG emissions or global climate change. By the adoption of Assembly Bill (AB) 32 and Senate Bill (SB) 97, however, the State of California established GHG reduction targets and has determined that GHG emissions as they relate to global climate change are a source of adverse environmental impacts in California. AB 32, the California Climate Solutions Act of 2006 (see Statutes 2006, Chapter 488, enacting Health and Safety Code, Sections 18500–38599), establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. Senate Bill (SB) 32, passed in September 2016, requires the state board to ensure that statewide GHG emissions are reduced to 40% below the 1990 level by 2030.

The impact that GHG emissions have on global climate change does not depend on whether the emissions were generated by stationary, mobile, or area sources, or whether they were generated in one region or another. Thus, consistency with the state’s requirements for GHG emissions reductions is the best metric for determining whether the proposed project would contribute to global warming. In the case of the proposed project, if the project substantially impairs the state’s ability to conform to the mandate to reduce GHG emissions to 1990 levels by the year 2030, then the impact of the project would be considered significant.

Discussion of Impacts:

- a) *Less Than Significant Impact.* The proposed project is a minor construction project which would generate minor GHG emissions during construction but would result in no future operational emissions except when backup generators are in use.
- b) *No Impact.* The proposed project would not conflict with any adopted plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions.

Mitigation Measures:

None required.

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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.8 HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 of the California Code of Regulations (CCR), Title 22, Section 662601.10, as follows:

A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or

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incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed.

Most hazardous materials regulation and enforcement in Siskiyou County is managed by the Siskiyou Community Development Department - Environmental Health Division, which refers large cases of hazardous materials contamination or violations to the Central Valley Regional Water Quality Control Board (RWQCB) and the California Department of Toxic Substances Control (DTSC). When issues of hazardous materials arise, it is not at all uncommon for other agencies to become involved, such as the Air Pollution Control District and both the federal and state Occupational Safety and Health Administrations (OSHA).

Under Government Code Section 65962.5, both the DTSC and the State Water Resources Control Board (SWRCB) are required to maintain lists of sites known to have hazardous substances present in the environment. Both agencies maintain up-to-date lists on their websites. A search of the DTSC and SWRCB lists did not identify any hazardous waste violations in the vicinity of the project site.

A Phase I Environmental Site Assessment Report (ESA) was prepared for the project site on January 24, 2018 by Trileaf Corporation (Trileaf Corporation 2018). The Phase I ESA revealed no evidence of recognized environmental conditions (RECs) in connection with the project site.

Discussion of Impacts:

- a) *No Impact.* The proposed project would not require the routine transport, use, or disposal of hazardous materials except for the use of small amounts of diesel gasoline to run backup generators.
- b) *No Impact.* See Response 4.8(a). No hazardous materials would be stored on the site. There is not expected to be any more development of the site after this project is completed, so there would not be any future risk of an accidental release.
- c) *No Impact.* The proposed project is not located within one-quarter mile of an existing or proposed school.
- d) *No Impact.* According to the DTSC Envirostor database (California Department of Toxic Substances Control, 2018) and SWRCB GeoTracker database (State Water Resources Control Board, 2018: Accessed May 13, 2018), which were reviewed on May 14, 2018, the project site has not been identified as a hazardous materials spill site.
- e) *No Impact.* The project site is more than two miles from any public or private airport. The closest public airport to the project site is the Scott Valley Airport, located approximately eight miles north of the project site.
- f) *No Impact.* See Response 4.8(e). The project site is not located in the vicinity of a private airstrip.
- g) *No Impact.* There is nothing about the proposed project that would substantially interfere with an adopted emergency response or evacuation plan.
- h) *Less than Significant Impact.* There is the potential for wildland fires in the region given the relatively dry summer climate, with hot days and wind, and the project site location in a very high fire hazard severity zone in a State Responsibility Area (SRA) (California Department of Forestry and Fire Protection, 2007). However, the proposed project is an unmanned tower

and associated equipment and facilities, so it would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.9 HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The most significant hydrologic feature in the project vicinity is Scott River, located approximately 2.5 miles west of the project site. No other significant surface water features exist in the project vicinity.

No groundwater wells would be installed as part of or as a result of the project. Water and wastewater disposal services would not be necessary to serve this project.

The project site is near the summit of Denny Point; therefore, the project site is not within a 100-year flood zone.

Discussion of Impacts:

- a) *No Impact.* The proposed project would not impact water quality standards and/or waste discharge requirements as the unmanned tower and associated equipment and facilities would not have any water or wastewater connected to the project.
- b) *Less Than Significant Impact.* Although the project would result in the creation of impervious surfaces as the tower and equipment sheds are developed, these surfaces would be small in size and would not interfere with groundwater recharge. Additionally, no groundwater would be used during construction or operation.
- c) *Less Than Significant Impact.* The base of the tower and the equipment sheds would result in limited areas of impervious surfaces. However, due to the size of the surfaces and the permeability of project site soils, it's anticipated that any sediment laden stormwater would percolate into the ground prior to leaving the project site.
- d) *No Impact.* See Response 4.9(c) above. Grading is required to level the project site, which would occur on the 7,000 square foot project site, the 300 linear feet of access road, and 200 linear feet of trench for the new electrical power. However, the project would not substantially alter the existing drainage pattern such that there would be an increased risk of flooding on- or off-site.
- e) *No Impact.* See Responses 4.9(c) through 4.9(d) above. The proposed project would not result in an increase in stormwater runoff.
- f) *Less Than Significant Impact.* See Responses 4.9(a) through 4.9(e).
- g) *No Impact.* The project is not located within a 100-year flood hazard area (Federal Emergency Management Agency, 2011: accessed May 14, 2018).
- h) *No Impact.* See Response 4.9(g) above.
- i) *No Impact.* The project would not result in the failure of a levee or dam, nor would it expose people or structures to a significant risk of loss, injury or death involving flooding because the project site is located at an elevation of 4,788 feet. Additionally, according to the inundation maps prepared for Siskiyou County, the project site is not within an inundation area (Kleinschmidt, 2010).
- j) *No Impact.* The project site is located on the top of a slope and not located near an ocean or large body of water with potential for seiche or tsunami.

4.0 ENVIRONMENTAL CHECKLIST

Mitigation Measures:

None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.10 LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The basis for land use planning at the project site is the County’s General Plan. The Land Use Element of the General Plan provides the primary guidance on issues related to land use and land use intensity. The Land Use Element provides designations for land within the County and outlines goals and policies concerning development and use of that land. The County has also adopted the Scott Valley Area Plan (Siskiyou County, 1980) which covers the project site. The Scott Valley Area Plan includes goals and policies to manage growth and protect the natural resources of the Scott Valley Watershed.

The primary goal of the Land Use/Circulation Element of the Siskiyou County General Plan is to allow the physical environment to determine the appropriate future land use pattern that will develop in Siskiyou County. This is contrary to conventional planning practice in which one master land use map indicates future land use patterns based primarily on social, political, and economic factors. Its focus is for future development to occur in areas that are easiest to develop without entailing great public service costs, that have the least negative environmental effect, and that do not displace or endanger the county’s critical natural resources.

The technique used for the development of the Land Use Element involved preparation of a series of overlay maps identifying development constraint areas. Constraints take the form of both natural, physical barriers or problems and those culturally imposed on the basis of resource protection. The combination of overlay maps provides a visual display of tones representing physical constraints in a particular geographic area in terms of the perceived effect of urban development. In identifying an absence of physical constraints, it also indicates where urban development may proceed without encountering known physical problems.

Discussion of Impacts:

- a) *No Impact.* The project would not result in the division of an existing community as the project site is not located in a community, rather it is located near the top of Denny Point.
- b) *No Impact.* The project would not conflict with applicable plans that have jurisdiction over the project area. Consistent with the applicable County land use policies, the project is a

4.0 ENVIRONMENTAL CHECKLIST

proposed unmanned telecommunication tower and associated equipment and facilities in an agricultural zoned area. The project would require a use permit from the County.

- c) *No Impact*. CDFW adopted a Conservation Plan for Gray Wolves in California in 2016, which covers the project site. No aspect of the proposed project would conflict with this conservation plan because the project would not affect the gray wolves' habitat or movement.

Mitigation Measures:

None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.11 MINERAL RESOURCES. Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

Historically, gold mining was responsible for the establishment of several communities within Siskiyou County. Although some mining still takes place, the resource is greatly diminished and no longer plays a significant role in the economy. Nevertheless, gold continues to draw interest in the region, especially when gold prices are high.

The State Mining and Geology Board has the responsibility to inventory and classify mineral resources and could designate such mineral resources as having a statewide or regional significance. If this designation occurs, the local agency must adopt a management plan for such identified resources. At this time, there are no plans to assess local mineral resources for the project area or Siskiyou County.

Discussion of Impacts:

- a) *No Impact.* The project would not result in the loss of an available known mineral resource that would be of value to the region or residents of the state.
- b) *No Impact.* See Response 4.11(a) above. There are no locally important mineral resource recovery sites within the project area delineated in the County general plan.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.12 NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance or of applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area or, where such a plan has not been adopted, within 2 miles of a public airport or a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The Siskiyou County General Plan Noise Element identifies land use compatibility standards for exterior community noise for a variety of land use categories for project planning purposes. For residential land uses, an exterior noise level of 60 Ldn (Day-Night Level) is identified as being "acceptable" requiring no special noise insulation or noise abatement features unless the proposed development is itself considered a source of incompatible noise for a nearby land use. The outdoor noise level planning criteria identified in the Noise Element are intended to "assure that a 45 Ldn indoor level will be achieved by the noise attenuation of regular construction materials." Existing noise sources at the project site are nonexistent as the parcel is near the top of Denny Point with no nearby urban uses.

Discussion of Impacts:

- a) *Less Than Significant Impact.* The proposed project would generate temporary noise levels during construction of the project; however, the closest sensitive receptors (residences) are approximately 1.7 miles away. At that distance the project would not generate noise levels in excess of standards established in the local general plan.
- b) *Less Than Significant Impact.* During development of the project site, heavy equipment may be utilized that could generate localized groundborne vibration and groundborne noise;

however, since the duration of impact would be brief and there are no sensitive receptors in the vicinity, the impact would be less than significant.

- c) *No Impact.* The project is an unmanned tower and associated equipment and facilities so would not result in any increase in ambient noise after construction has been completed, except for the occasional noise from backup generators. However, due to the long distance from the project site to residences, no impact would occur.
- d) *Less Than Significant Impact.* See Responses 4.11(a) through (c).
- e) *No Impact.* The project is not located within two miles of a public airport or within an airport land use plan area.
- f) *No Impact.* The project is not located in the vicinity of a private airstrip.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.13 POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The project site is located near the top of Denny Point at an elevation of approximately 4,788 feet. The closest community is Etna, which is approximately 4.5 miles to the west.

Discussion of Impacts:

- a) *No Impact.* The project would not induce population growth in the area. The unmanned tower would be serviced on occasion by maintenance and repair personnel that do not need to live in the area. No new permanent roads, homes, or businesses would be constructed for this project.
- b) *No Impact.* There are currently no dwellings on the project site; therefore, the project would not displace any housing.
- c) *No Impact.* There are currently no people living at the project site and construction of the project would not result in nearby residents needing to move; no people would be displaced by the project.

Mitigation Measures:

None required.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.14 PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

FIRE PROTECTION

Fire protection services for the project site are provided by Cal Fire and the Scott Valley Fire Protection District. There are seven Cal Fire stations in the County. The nearest is Fort Jones located at 17140 McAdams Creek Road, approximately 16 miles north of the project site. The nearest emergency source of water for fire protection is the Scott River, approximately 2.5 miles west of the project site.

POLICE PROTECTION

Police protection services at the project site are provided by the Siskiyou County Sheriff’s Department and Etna Police Department. The nearest Sheriff’s Department substation is located at 305 Butte Street, Yreka, located approximately 38 driving miles from the site. Additionally, the California Highway Patrol and Yreka Police offices are both located in Yreka. These agencies would likely provide additional support to the Sheriff’s Department in case of any emergency.

SCHOOLS

The area is served by the Scott Valley Unified School District for kindergarten through High School at 11918 Main Street, Fort Jones.

RECREATION

Recreational opportunities are limited in the immediate project area. However, the community of Etna, approximately 4.5 miles to the west, has a city park, swimming pool, tennis courts, ball fields, and other related recreational opportunities. Additional recreation opportunities in the Klamath National Forest include but are not limited to: bicycling, camping, fishing, hiking, horseback riding, hunting, water activities, and winter sports.

OTHER PUBLIC FACILITIES

The project site is located approximately 4.5 miles east of the community of Etna in open woodlands and grasslands; there are no other public facilities within the vicinity of the site.

4.0 ENVIRONMENTAL CHECKLIST

Discussion of Impacts:

- a) *No Impact.* The project would not increase calls for fire protection as it would be an unmanned tower.
- b) *No Impact.* The unmanned tower would not result in any additional calls for sheriff or police protection services or affect the provision of law enforcement services in the region.
- c) *No Impact.* The project would not result in increased school enrollment and would not generate a need for new school facilities.
- d) *No Impact.* The project would not result in any changes to use of recreational facilities as it is an unmanned telecommunication tower.
- e) *No Impact.* The project would not impact any other governmental services or facilities.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.15 RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

See Section 4.14 (Recreation) above.

Discussion of Impacts:

- a) *No Impact.* The project would not alter the population in the area in any way and as a result would not have an impact on recreation in the area. It would not cause deterioration or the need for expanded or new facilities.
- b) *No Impact.* See Response 4.15(a). The project does not include the construction of recreational facilities or require the construction or expansion of such.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.16 TRANSPORTATION/TRAFFIC. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

The project site is located near the summit of Denny Point. An existing access road off of McConaughy Gulch Road would be used to access the site. State Route (SR) 3 is the closest highway and is approximately three miles to the west. SR 3 runs in a north-south direction through Scott Valley.

The County of Siskiyou provides a public bus system, Siskiyou Transit and General Express (STAGE), which makes several stops in the community of Etna, however, it does not stop near the project site.

Discussion of Impacts:

- a) *Less Than Significant Impact.* The proposed project is an unmanned tower and associated equipment and facilities, and as such would not produce any additional daily trips. This project would not change the existing traffic load, and all area road segments and intersections would continue to maintain a level of service of "C" or better, resulting in a

stable flow of traffic with little or no delay at intersections. Because the project would not decrease the level of service of the area road network or the intersections to less than level of service "C", the proposed project is consistent with the Siskiyou County Circulation Element (Siskiyou County 1987).

- b) *Less Than Significant Impact*. See Response 4.16(a). The proposed project would not conflict with an applicable congestion management program or level of service standard.
- c) *No Impact*. The closest public airport to the project site is the Scott Valley Airport, located approximately eight miles north of the project site. However, there are no project components that would affect air traffic patterns or result in safety risks.
- d) *No Impact*. The proposed project would be located near the summit of Denny Point and would not substantially increase hazards due to a design feature or incompatible uses. A proposed access easement would extend southeast from the project site with an existing access road, which connects to McConaughy Gulch Road to the south. The project would also include limited maintenance vehicle trips to the site; however, the additional vehicle maintenance trips would not cause or increase the severity of any hazardous design feature. There would not be any design features or uses that would increase hazards.
- e) *No Impact*. The proposed project would not generate any emergency trips to this site as it would be an unmanned facility. The site is located near the summit of Denny Point and would be accessible via an access road from McConaughy Gulch Road to the tower for maintenance vehicles and trucks.
- f) *No Impact*. The project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Mitigation Measures:

None Required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>4.17 TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p>				
<p>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), or?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>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?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Setting:

On January 1, 2015, Public Resources Code (PRC) Section 21074, which defines a "tribal cultural resource", became effective. PRC Section 21074 states the following:

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) 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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms to the criteria of subdivision (a).

Discussion of Impacts:

- a) *Less Than Significant With Mitigation Incorporated.* The project was circulated to the Karuk and Torres Martinez Desert Cahuilla tribes for their review. No response was received from either tribe during the 30-day consultation request period. See Response 4.5(a) and (b). With incorporation of mitigation measures MM 5.1 and MM 5.3 the impact from the proposed project upon any known or unknown tribal cultural resource present onsite would be reduced to a less-than-significant level. Therefore, mitigation measure **MM 5.1** and **MM 5.3** are provided to address the potential for the discovery of any unrecorded or previously unknown tribal cultural resources.
- b) *Less Than Significant With Mitigation Incorporated.* See Response 4.17(a).

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.18 UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting:

WATER

No permanent water source is needed for this site as it is an unmanned tower.

WASTEWATER

Because the project is an unmanned tower, no wastewater would be created. As such, no wastewater disposal is necessary for this site.

STORM DRAINAGE

Given the undeveloped nature of the project area and the permeability of area soils, existing storm drainage facilities are limited. No curb or gutter is located in the project vicinity. The rock outcrops and soils at and around the project site allow for necessary storm drainage.

SOLID WASTE

The Yreka transfer station is located at 2420 East Oberlin Road in Yreka. At the project site there is no existing source of solid waste.

Discussion of Impacts:

- a) *No Impact.* Wastewater disposal is regulated under the federal Clean Water Act and the state Porter-Cologne Water Quality Control Act. The Central Valley Regional Water Quality Control Board (RWQCB) implements these acts by administering the National Pollutant Discharge Elimination System (NPDES), issuing water discharge permits, and establishing best management practices. The proposed project would not include any new dwellings and would not result in any increase to wastewater.
- b) *No Impact.* See Response 4.18(a). No new or expanded water or wastewater treatment facilities would be needed for this project. The proposed project would not result in an increased need for facilities.
- c) *No Impact.* See Responses 4.18(a) and 4.18(b). No new or expanded stormwater drainage facilities would be needed for this project. While the project would include the construction of equipment sheds, the amount of impervious surface created from this would be minor and not result in an increased need for stormwater drainage facilities.
- d) *No Impact.* The project would not require a water source as it is an unmanned tower so there would be no impact to water supply.
- e) *No Impact.* See Response 4.18(a) and 4.18(b).
- f) *No Impact.* The proposed project would not result in any additional solid waste disposal needs as it would be an unmanned tower. Therefore, no additional landfill capacity would be needed.
- g) *No Impact.* The proposed project would not result in production of any solid waste.

Mitigation Measures:

None required.

4.0 ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.19 MANDATORY FINDINGS OF SIGNIFICANCE				
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, 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? "Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion of Impacts:

- a) *Less Than Significant With Mitigation Incorporated.* While several Initial Study sections have identified the potential for significant environmental impacts without mitigation, with the implementation of mitigation measures proposed within the relevant sections of this Initial Study, all potential project impacts would be reduced to a level that is considered less than significant.
- b) *Less Than Significant With Mitigation Incorporated.* Implementation of the proposed project, in conjunction with other approved or pending projects in the region, has the potential to result in cumulatively considerable impacts to the physical environment. However, with implementation of mitigation measures proposed within the relevant sections (cultural resources and tribal cultural resources) of this Initial Study, the project's contribution to potential cumulative impacts would not be cumulatively considerable.
- c) *Less Than Significant.* No aspect of the proposed project would have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

6.1 DOCUMENTS REFERENCED IN INITIAL STUDY AND/OR INCORPORATED BY REFERENCE

The following references were used in the preparation of this report. Compliance with federal, state, and local laws is assumed in all projects.

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