MITIGATED NEGATIVE DECLARATION

Initial Study & Environmental Analysis
For:

Use Permit 23-02
VB Edge, LLC (Galarza) – Ohm Road

Prepared By:

COUNTY OF TEHAMA
Planning Department
444 Oak Street
Courthouse Annex, Room I
Red Bluff, CA 96080

(July 31, 2026)

FILED
OCT 2 0 2026 43
SEAN HOUGHTBY
TEHAMA COUNTY CLERK & RECORDER
BY ariana tepeda

TEHAMA COUNTY PLANNING DEPARTMENT
ENVIRONMENTAL SIGNIFICANCE CHECKLIST
Meets requirements of CEQA §15063(d), Initial Study

BACKGROUND

1. **PROJECT TITLE:** Use Permit 23-02 – VB Edge, LLC (Galarza) – Ohm Road

2. **LEAD AGENCY NAME AND ADDRESS:**
   Tehama County Planning Department
   444 Oak Street, Room I, Courthouse Annex
   Red Bluff, CA 96080
   (530) 527-2200
   planning@tehama.gov

3. **CONTACT PERSON:**
   Greg Redeker, AICP, Planner IV
   (530) 527-2200

4. **APPLICANT/PROJECT PROPONENT NAME AND ADDRESS:**
   VB Edge, LLC
   750 Commerce Dr., Suite 200
   Boca Raton, FL 33847

   c/o Scott Dunaway
   D4 Communications, LLC
   1187 Coast Village Rd., Ste 1-534
   Santa Barbara, CA 93108

5. **DESCRIPTION OF PROJECT:**
   The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f. The project site is located in an AG-2 Agricultural/Valley Zoning District and is designated Valley Floor Agriculture on the General Plan land use diagram.

6. **PROJECT LOCATION:**
   The project is located on the north side of Ohm Road between Paskenta Road and Rawson Road in the community of Red Bluff, California, on the southwest portion of APN 035-180-011, Township 26N, Range 03W Section 18, M.D.B.& M.

7. **GENERAL PLAN DESIGNATION:**
   Valley Floor Agriculture (VFA)

8. **ZONING:**
   AG-2 (Agricultural/Valley Zoning District)

9. SETTING AND SURROUNDING LAND USES:

The project is located on the north side of Ohm Road between Paskenta Road and Rawson Road in the community of Red Bluff, California, on the southwest portion of APN 035-180-011, Township 26N, Range 03W Section 18, M.D.B.& M. The area is sparsely developed; adjacent land uses include agricultural range land with occasional residences to the north, east, and west, and undeveloped agricultural range land across Ohm Road to the south. The area is marked by hardpan soils, with some nearby ephemeral drain courses and vernal pools. The project site is on an elevated patch of ground adjacent to Ohm Road, and the project footprint has been modified to avoid the nearest ephemeral drainage.

10. CALIFORNIA NATIVE AMERICAN TRIBES CONSULTATION:

There have been no California Native American tribes traditionally and/or culturally affiliated with the project area that requested consultation pursuant to Public Resources Code section 21080.3.1. Letters inviting consultation were mailed out to those tribes affiliated with the project area on February 3, 2026; to date, no requests for consultation have been received by Tehama County.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☐ Cultural Resources	☐ Energy
☒ Geology /Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☒ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

ENVIRONMENTAL DETERMINATION

After Review of the Initial Study, the Environmental Determination:

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

☒ Found that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared. See Attached Mitigation Measures & Monitoring Program.

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

☐ Found 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.

☐ Found 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.

Greg Redeker, AICP, Planner IV

07/31/2026

Date: 7/31/2026

EXHIBITS

AERIAL MAP (Exhibit "A")	PAGE 6
SITE PLAN (Exhibit "B1")	PAGE 7
SITE PLAN DETAIL (Exhibit "B2")	PAGE 8
LAND USE MAP (Exhibit "C")	PAGE 9
ZONING MAP (Exhibit "D")	PAGE 10
FEMA MAP (Exhibit "E")	PAGE 11
SOILS MAP (Exhibit "F")	PAGE 12
DOC FARMLAND MONITORING MAP (Exhibit "G")	PAGE 13

Exhibit "A"
Aerial Map

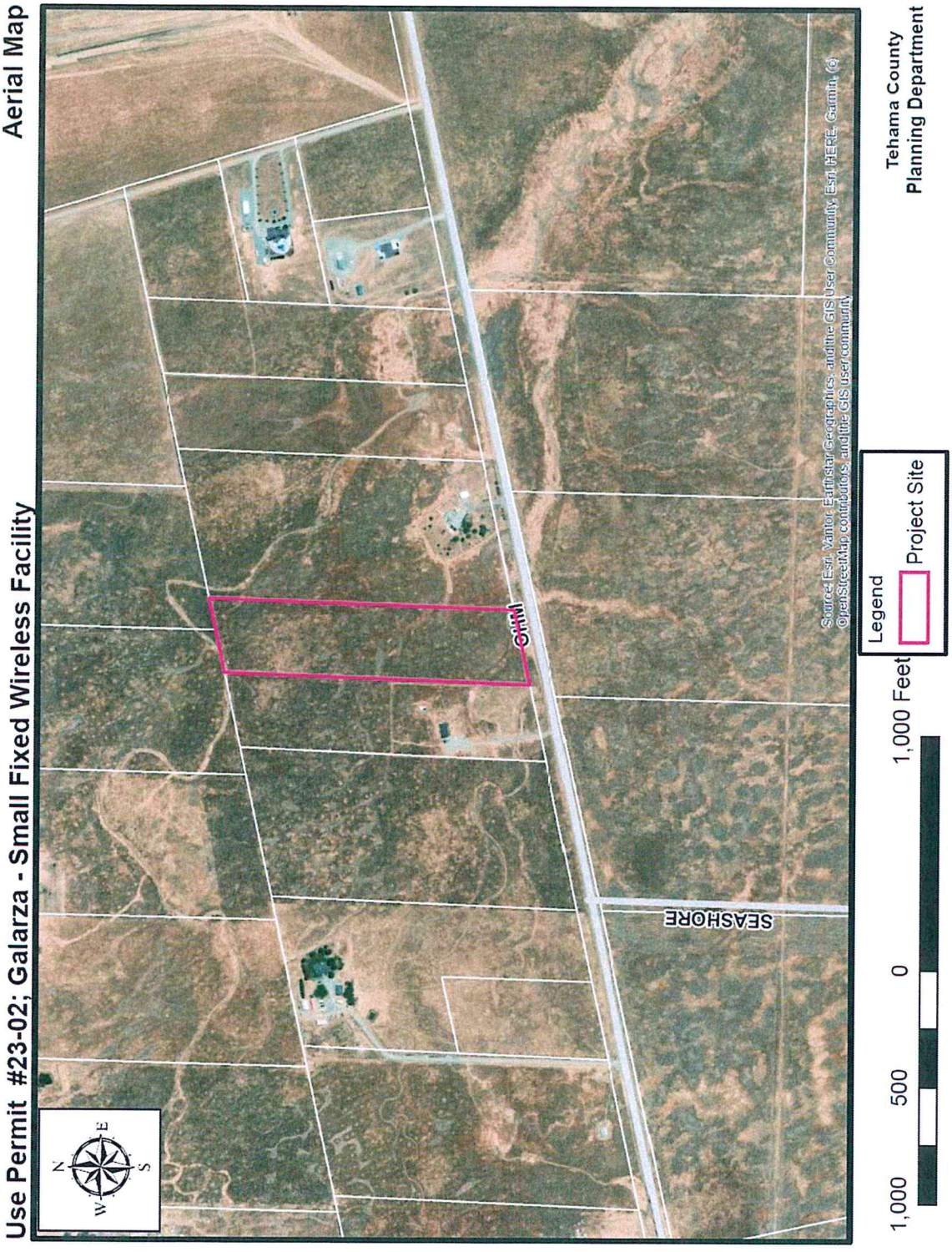


Exhibit "B1"
SITE PLAN

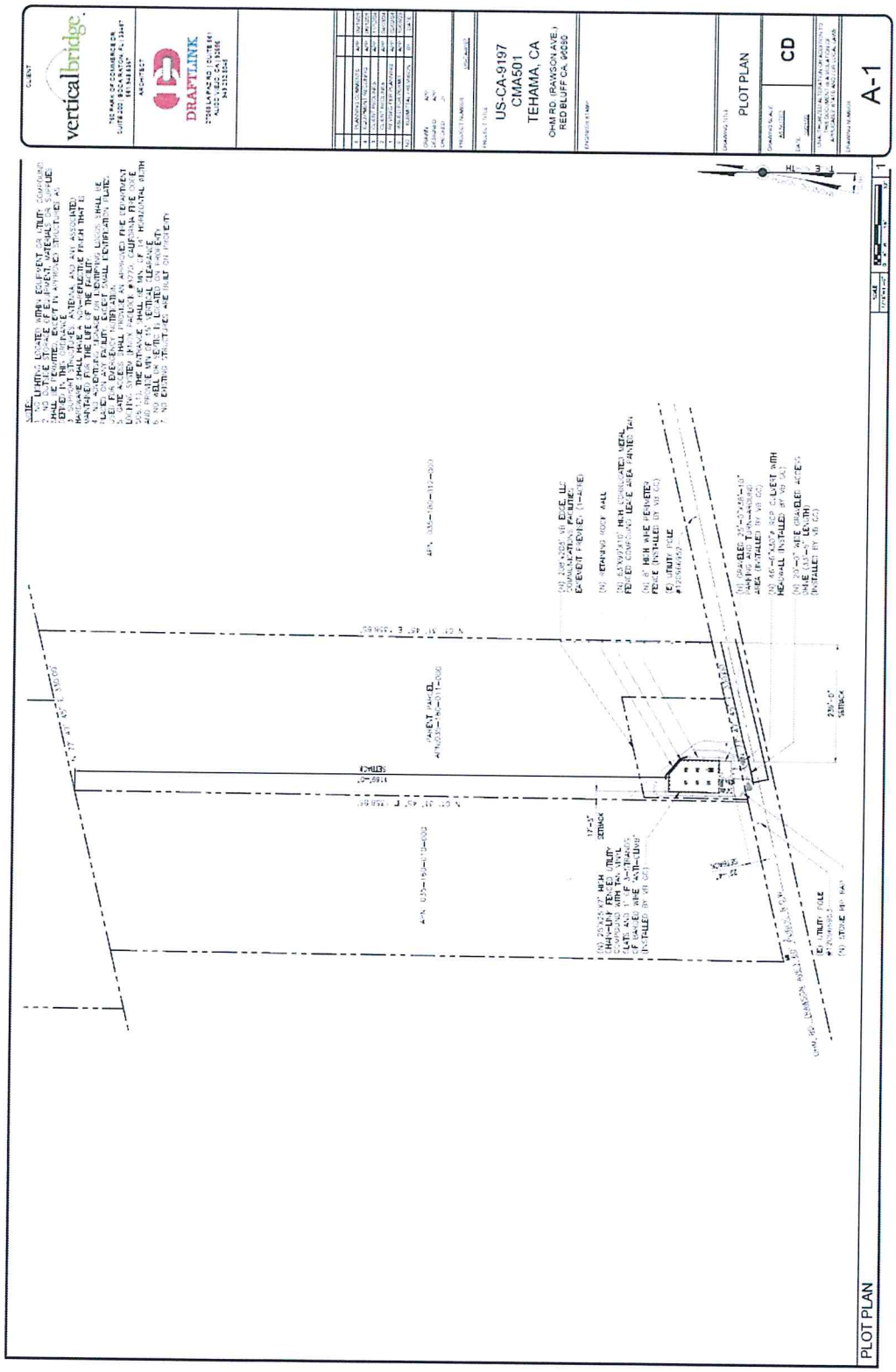


Exhibit "B2"
SITE PLAN DETAIL

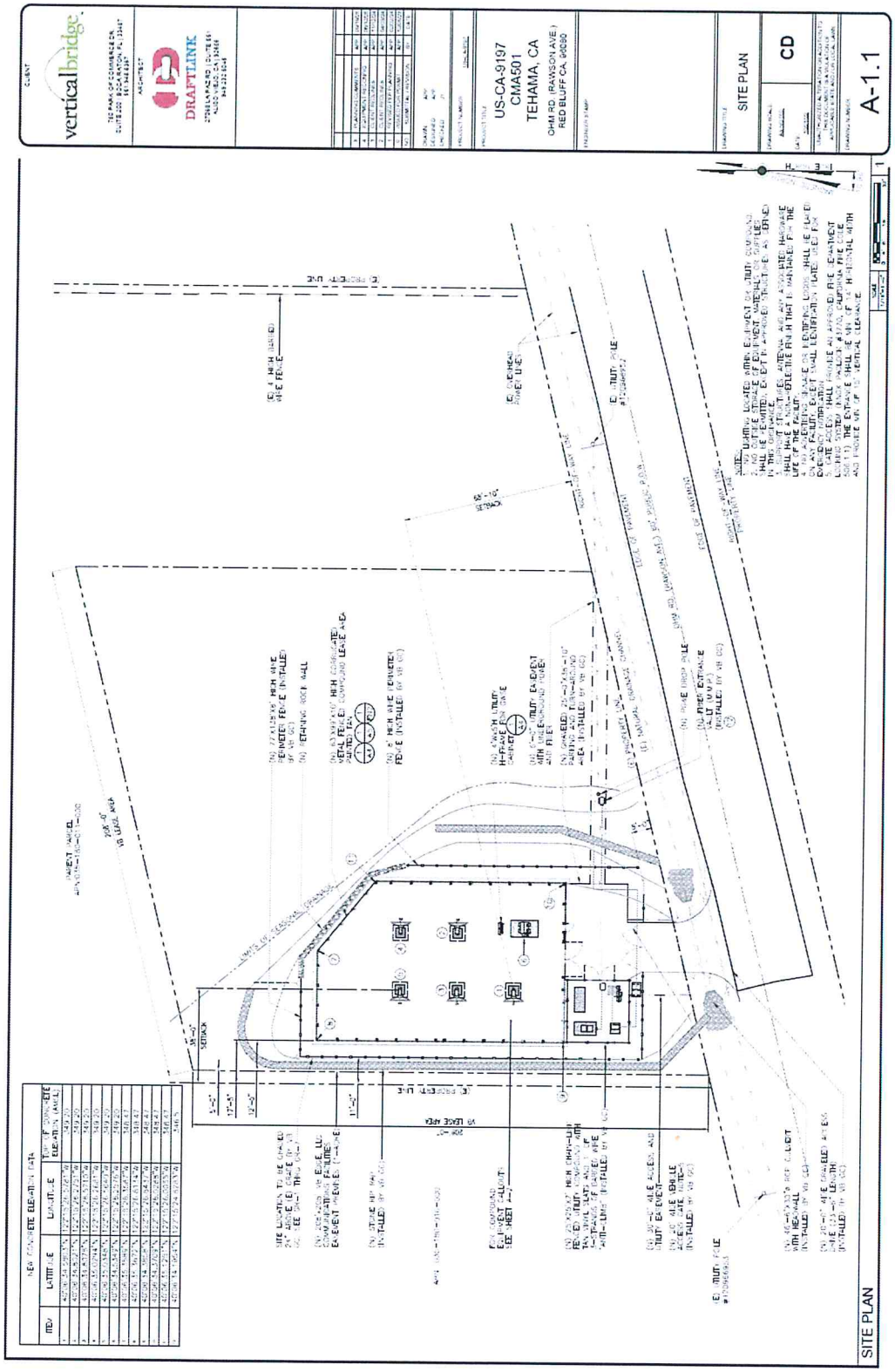


Exhibit "C"
Land Use Map

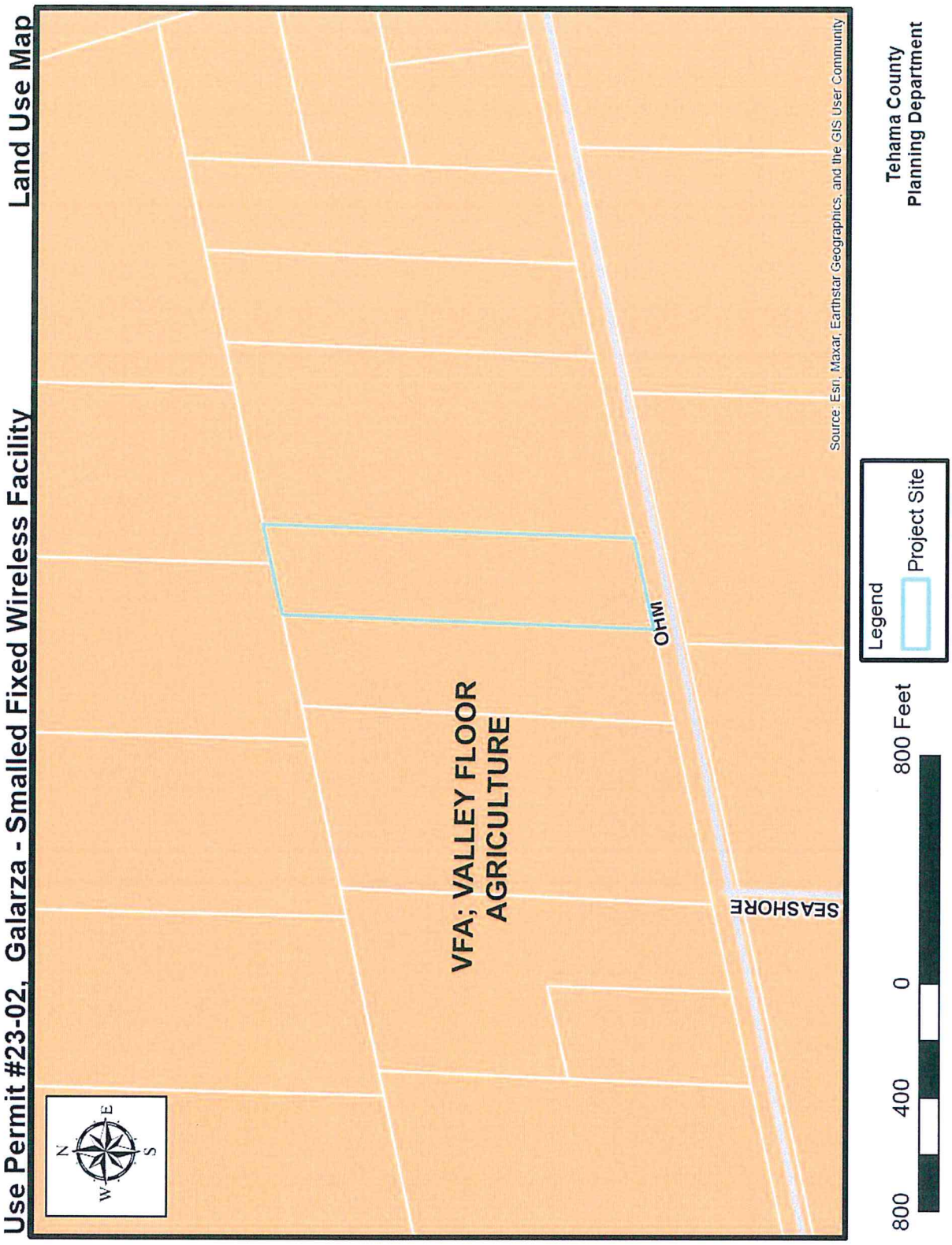


Exhibit "D"
Zoning Map

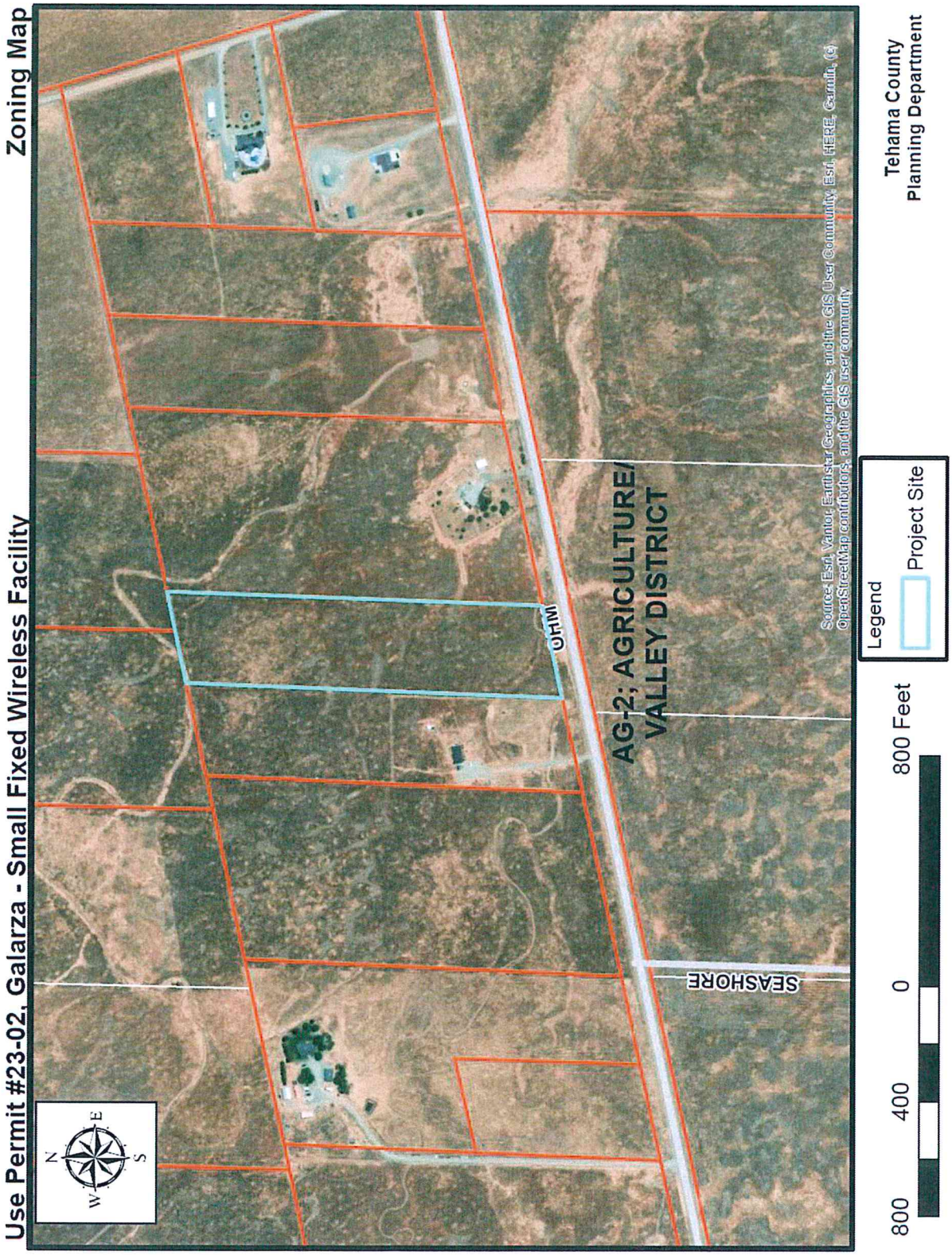


Exhibit "E"
FEMA Map

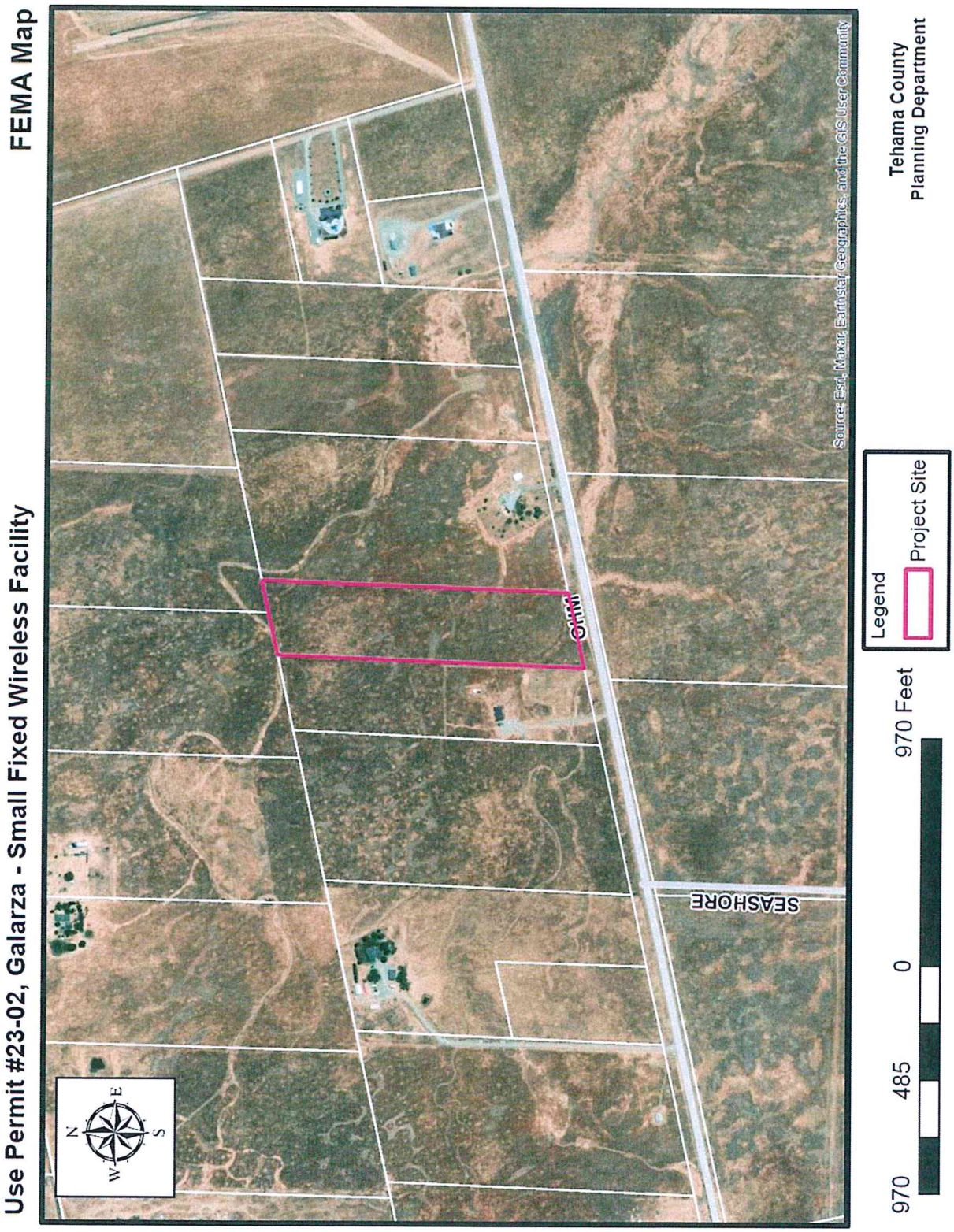


Exhibit "F"
SOILS Map

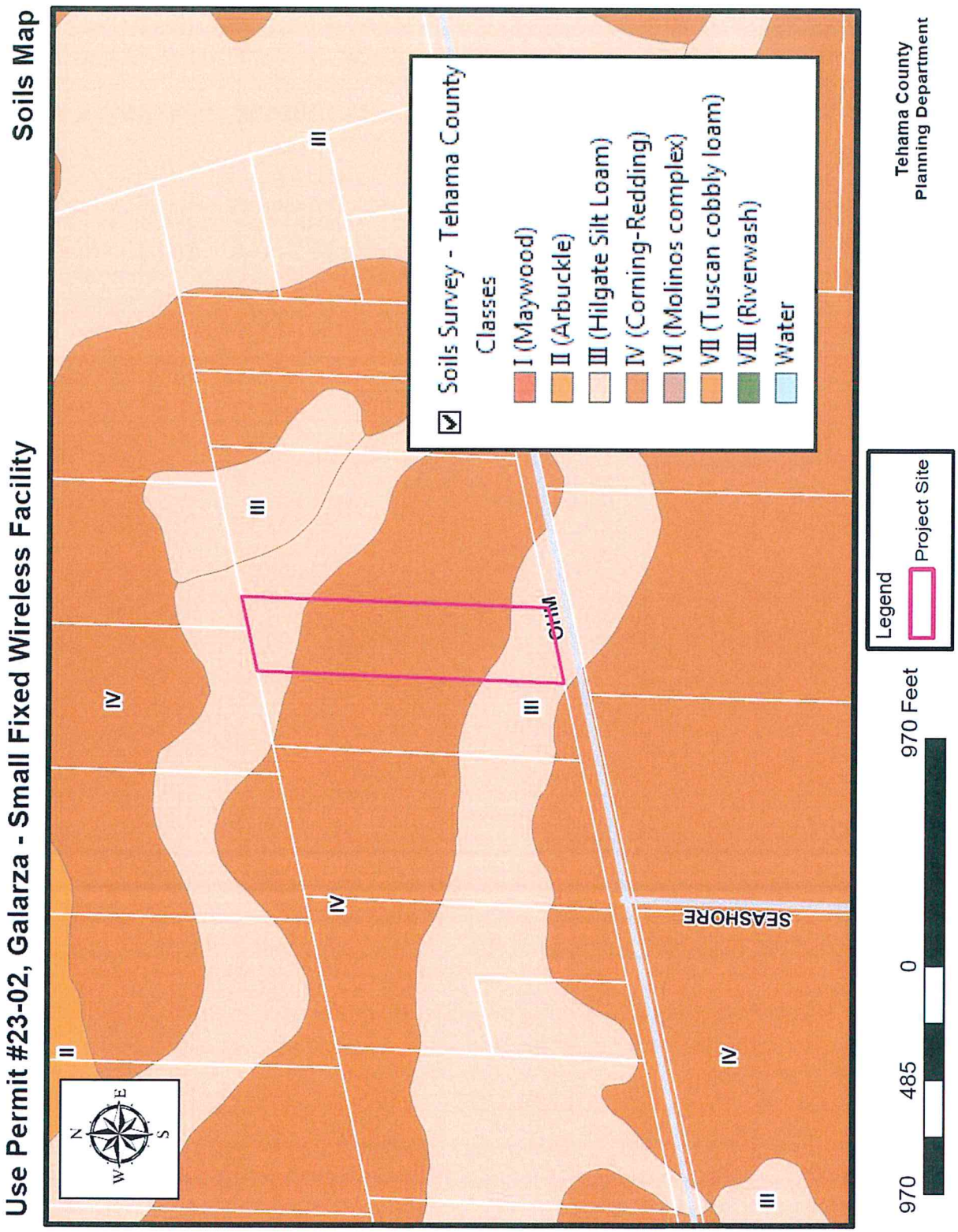
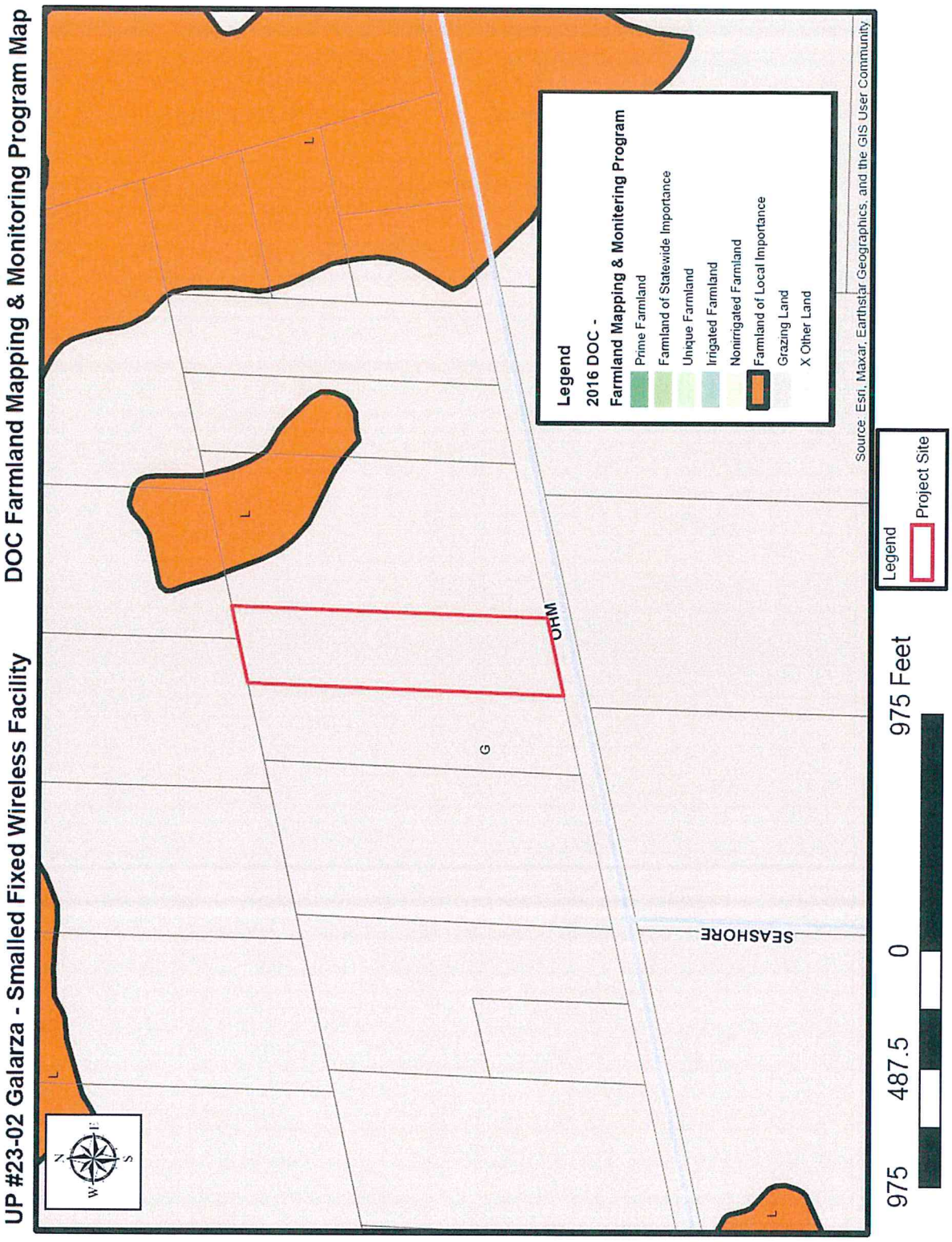


Exhibit "G"
DOC- Farmland Monitoring Program Map



EVALUATION OF ENVIRONMENTAL IMPACTS

This section discusses potential environmental impacts associated with approval of the proposed project.

The following guidance, adapted from Appendix G of the State CEQA Guidelines, was followed in answering the checklist questions:

1. A brief explanation is required for all answers except "*No Impact*" answers that are adequately supported by the information sources cited following each question. A "*No Impact*" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "*No Impact*" answer is explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the Tehama County Planning Department has determined that a particular physical impact may occur, then the checklist answers will indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "*Potentially Significant Impact*" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "*Potentially Significant Impact*" entries when the determination is made, an EIR is required.

4. "*Negative Declaration: Less Than Significant With Mitigation Incorporated*" applies where the incorporation of mitigation measures has reduced an effect from "*Potentially Significant Impact*" to a "*Less Than Significant*" impact. The mitigation measures, and a brief explanation as to how they reduce the effect to a less than significant level will follow each issue section (mitigation measures from "Earlier Analyses," may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
I. AESTHETICS				
Would the project:				
a) Have a substantial adverse effect on a scenic vista or scenic highway?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings?	☐	☐	☐	☒
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence painted tan to blend in with the surrounding terrain, reducing its visual prominence. Utilities will similarly be enclosed within an adjacent area surrounded by chain link fence with slats. Lighting is fully shielded and directed downward, and will only be used when service personnel are on the site. The site is not located within a scenic area, and is not viewable from any scenic vista or scenic highway. The area is characterized as sparsely developed rangeland, and is unremarkable in terms of scenic quality.

a) **No Impact.** The project is not located within or near a scenic vista, and there are no state scenic highways in the area.

b) **No Impact.** The project will not damage scenic resources, and there are no state scenic highways in the area.

c) **No Impact.** The project will not degrade the visual character of the site or surroundings, which is characterized as sparsely developed rangeland that is unremarkable in terms of scenic quality.

d) **No Impact.** The project will not create a new source of substantial light or glare, as lights will be full cutoff fixtures and only used when maintenance personnel are on site.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

II. AGRICULTURE AND FOREST 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 Resources Board. --Would the project:

a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

a-e) No Impact. The project will disturb no more than 0.4 acres of land classified as "Grazing Land" on the Department of Conservation Farmland Map, which is not considered Prime or any other named status of farmland. The project site is not in the Williamson Act, and the proposed type of facility is allowed with a use permit in the AG-2 zoning district. As an unmanned facility tolerant of a wide variety of agricultural practices and requiring little public infrastructure, there is no foreseeable effect on the continued agricultural use of nearby farmland, or on the conversion of nearby farmland to non-agricultural use. The remainder of the 10-acre property will continue to be available for use as grazing land. No forest land or timberland is located anywhere on or near the project site.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

III. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district 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?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutants concentrations?	☐	☐	☐	☒
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

Tehama County is considered a non-attainment area for State Ozone and PM_{10}. Pursuant to existing regulations, all new developments in the County are required to pay a standard Air Pollution Control fee (Indirect Source Fee) to help mitigate the effects of new construction and population growth. The fee is collected by the Tehama County Air Pollution Control District (TCAPCD). Contractors are given the option of paying the Indirect Source fee, or providing on or off-site mitigation through an Alternative Emission Reduction Plan. Therefore, at the time future development is proposed, TCAPCD will impose their standards for construction. Existing regulation also requires the applicant to obtain a Fugitive Dust Permit from the TCAPCD for construction that disturbs 10,000 square feet or more of surface area.

a) **Less Than Significant Impact.** The project will not conflict with or obstruct any applicable air quality plan. Any future development on the proposed parcels would be subject to standard Air Quality Control measures during construction, as established in the General Plan and as implemented by the TCAPD. This existing regulation will be emphasized via a condition of approval for the use permit.

b) **No Impact.** The project is an unmanned facility that will not result in a cumulatively considerable net increase of any criteria pollutant.

c) **No Impact**. The project is an unmanned facility on undeveloped ranch land, and will not expose any sensitive receptors to substantial pollutant concentrations.

d) **No Impact.** The project is an unmanned facility that will not result in other emissions such as odors that will adversely affect a substantial number of people.

IV. BIOLOGICAL RESOURCES	*Potentially Significant Impact (PSI)*	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
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 Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any 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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
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?	☐	☐	☒	☐

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The 2009-2029 Tehama County General Plan Update maps and defines areas of important biological resources. The County works closely with the California Department of Fish and Wildlife to protect biological resources and mitigate effects that future growth will have on these resources and their habitat. Therefore, to mitigate to levels which are less than significant the potential impacts identified in the special studies referenced in Section C at the end of this Initial Study, as well as correspondence and documentation from various regulatory agencies, the mitigation measures listed in this section will be incorporated.

Much of the information provided in this section is based on the results of a biological assessment that was conducted for the proposed project (Biological Resources Impact Analysis, Environmental Assessment Specialists (EAS), December 29, 2022 [Revised: February June 15, 2024]). The biological assessment was conducted in accordance with the requirements set forth in Tehama County Codes 17.70.020(B)&(C) & 17.70.040(A), (B), and (C).

Additionally, correspondence with the various wildlife agencies such as the U.S. Fish and Wildlife Service (USFW), California Department of Fish and Game (CDFG) and the US Army Corps of Engineers (ACOE) resulted in the need for other specific studies (i.e., focused plant survey report and wetland delineation report) which are listed in Section C and have also been incorporated by reference.

a) Potentially Significant Impact Unless Mitigated.

Sensitive Plant Species – The database search (CNDDB, CDFW, USFW) identified 17 special status plant species in the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles. The biological assessments performed for this project (see Section C) narrowed that list down to four sensitive plant species that were potentially present on or near the project site: Ahart's paronychia (*Paronychia ahartii*), Dwarf downingia (*Downingia pusilla*), Hendersons bent grass (*Agrostris hendersonii*), and Red Bluff dwarf rush (*Juncus leiospermus* var. *leiospermus*).

Initial surveys revealed none of these species present; however, based on the observation of a single spurge during a visit from CDFW staff, a supplemental late season plant survey was performed in August 2024. This supplemental survey revealed approximately two dozen examples of Red Bluff dwarf rush within the ephemeral drainage to the east of the project area, outside the area which will be disturbed. (The observed spurge was determined to be non-status Valley spurge, rather than special-status Stony Creek spurge.) The supplemental survey also determined that conditions were present for Dwarf downingia to occur in the same location as the Red Bluff dwarf rush, but that Dwarf downingia would not have been discernible in a survey at that time of year. The proposed avoidance and mitigation measures will reduce potential impacts to both plants, since they would occur in the same area.

Sensitive Wildlife Species – The database search (CNDDB, CDFW, USFW) for the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles identified 52 sensitive wildlife species. Of these, only two were determined likely to occur on the non-native grassland habitat found in the project area: Crotch's bumble bee (*Bombus crotchii*) and Vernal pool fairy shrimp (*Branchinecta lynchi*). The project site also contains marginally suitable foraging habitat for three bird species: Swainson's hawk, burrowing owl, and white-tailed kite. Avoidance and mitigation measures are proposed to limit potential impacts to all these species.

Crotch's bumble bee – According to the Biological Resources Impact Analysis (see Section C) the project site is within the known range of Crotch's bumble bee, which in 2022 was reinstated as a Candidate for protection under the California Endangered Species Act (CESA). No Crotch's bumble bee or other species of bumble bees were observed during multiple onsite field surveys (including June 2023, April 2024, and May 2024), and the non-native grassland covering the proposed project site is considered "low quality habitat" for Crotch's bumble bee. Implementation of several biology-related Best Management Practices that have been added to the project would limit potential impacts to special status species, including impacts to Crotch's bumble bees.

Vernal pool fairy shrimp – The project site is within an area designated by the U.S. Fish and Wildlife Service (USFWS) as critical habitat for the vernal pool fairy shrimp, a species that is Federally listed as a Threatened Species. Observations made during two field surveys confirmed that there are no vernal pools and no suitable habitat for vernal pool fairy shrimp on or adjacent to the project site. The project would not result in any adverse impacts to native habitats that constitute primary constituent elements (PCEs) as described in the critical habitat final rule. Consultation between EAS and the USFWS resulted in USFWS personnel concurring with EAS's determination that no vernal pool habitat is present; therefore, construction of the proposed facility would have no adverse impacts to vernal pool shrimp species or critical habitat elements.

Burrowing owl – Burrowing owl is a CESA candidate species, and is found in grassland habitats, lowland scrub, agricultural land, and open areas as a year-long resident. As a critical habitat feature, they require rodent or other fossorial burrows for roosting and nesting cover, with the preferred burrow being the California ground squirrel (*Spermophilus beecheyi*). They may also use pipes, culverts, and nest boxes in locations where burrows are scarce. Reasons for their decline include habitat destruction, insecticide, poisoning, rodenticide, and shooting. A habitat assessment for burrowing owl was conducted during the focused plant survey efforts. No burrowing owl or sign of burrowing owl were observed during the habitat assessment

surveys. No suitable burrows were observed on or within the vicinity of the project site, and the proposed facility is not expected to adversely affect burrowing owl. A requirement for a pre-construction clearance survey within 7 days of any construction activities to confirm that no burrowing owls are present has been added as a mitigation measure.

Swainson's hawk and white-tailed kite - Swainson's hawk is a CDFW listed Threatened species, while white-tailed kite is a CDFW Fully Protected species. Both species nest in oak savannahs and forage for voles in meadows and grasslands. No trees or potential nesting habitat for these species exist anywhere near the project site, although the site contains marginally suitable foraging habitat for these species. A habitat assessment for white-tailed kite and Swainson's hawk was conducted in both April and May of 2024 during the focused plant survey effort. No white-tailed kite or Swainson's hawk were observed on or within the vicinity of the site during the focused survey. No trees of any type are within 600 feet of the project site, and the nearest native oak tree is more than a mile to the north.

Overall, the project site contains marginally suitable foraging habitat for Swainson's hawk, burrowing owl, and white-tailed kite. Impacts to foraging habitat would be limited in size and would be considered less than significant on a local or regional basis. Adherence to Best Management Practices which have been added as mitigation measures will ensure that the installation of the proposed facility would limit potential impacts to sensitive raptor species to less than significant levels.

Sensitive Plant Communities - The records search identified five (5) sensitive plant communities that occur within the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles. This includes the following:

- Great Valley cottonwood riparian forest
- Great Valley mixed riparian forest
- Great Valley oak riparian forest
- Great Valley willow scrub
- Northern hardpan vernal pool

None of the listed sensitive plant communities occur on or adjacent to the project site; therefore, no sensitive plant communities would be adversely affected by the proposed project.

Migratory Birds / Nesting Birds - The Migratory Bird Treaty Act (MBTA) protects nearly all common wild birds found in the United States, with resident wildlife birds being managed separately by each state. California Fish and Game (CFG) Code 3503 makes it illegal to destroy any birds' nest or any birds' eggs that are protected under the MBTA. CFG Code 3503.5 further protects all birds of prey, such as hawks and owls, and their eggs and nests from any form of take. No avian nests or nesting activity were observed during field surveys. However, the low-lying grasslands within the project area and the surrounding vicinity could provide suitable avian nesting habitat for ground-nesting species.

Mitigation Measure #IV.1:
EMPLOYEE TRAINING: To minimize potential impacts to potentially sensitive biological resources, a qualified biologist will train all project staff regarding habitat sensitivity, identification of special status species, and required practices before the start of construction. The training shall include the general measures that are being implemented to conserve these species as they relate to the project, the penalties for non-compliance, and the boundaries of the project area. A fact sheet or other supporting materials containing this information will be prepared and distributed.

Mitigation Measure #IV.2:
SENSITIVE PLANT AVOIDANCE: A 50-foot buffer shall be established around the area containing the sensitive plant species Red Bluff dwarf rush (which may also contain Dwarf downingia) to the east of the project site, as depicted on the August 2024 late season plant survey. No vehicles, equipment, or materials shall be stored within this buffer area. The buffer shall be delineated and marked as directed by the monitoring biologist (see **Mitigation Measures #IV.4 and #IV.6**). Temporary minor encroachments into the buffer may be approved by the monitoring biologist upon a determination that said encroachment will not adversely affect the sensitive plant species.

Mitigation Measure #IV.3:
NESTING BIRD AVOIDANCE / SURVEY: Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey, no more than 7 days prior to the commencement of construction activities, to confirm that no burrowing owls or other ground-nesting birds or wildlife are present. Should an active nest be discovered during the survey, an appropriate non-disturbance buffer shall be established around each nest in consultation with CDFW and USFWS and in compliance with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act.

Mitigation Measure #IV.4:
CONSTRUCTION MONITORING: A qualified biologist will monitor all ground disturbing construction activity. The biologist shall complete a daily log summarizing activities and environmental compliance.

Mitigation Measure #IV.5:
MINIMIZE AREA OF DISTURBANCE: Permanent and temporary construction disturbances and other types of project-related disturbance to shall be minimized to the maximum extent practicable and confined to the project site. To minimize temporary disturbances, all project-related vehicle traffic shall be restricted to established roads, construction areas, and specifically designated access areas when possible. These areas also should be included in preconstruction surveys and, to the maximum extent possible, should be established in locations disturbed by previous activities to prevent further adverse effects.

Mitigation Measure #IV.6:
DELINEATION AND MARKING OF SENSITIVE HABITAT: Sensitive habitat areas shall be delineated with high visibility flagging or fencing to prevent encroachment of construction personnel and equipment into any sensitive areas during project work activities. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site.

Mitigation Measure #IV.7:
WILDLIFE PROTECTION AND ENTRAPMENT PREVENTION: Items that could pose a risk of wildlife entanglement such as ropes, cables, lines, etc. will be kept secure. Pipes, culverts, and similar materials will be stored to prevent wildlife species from using these as temporary refuges, and these materials must be inspected each morning for the presence of animals prior to being moved. All excavated areas greater than 6 inches deep will be provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each workday. If escape ramps cannot be provided, then holes or trenches will be covered with plywood or other hard material. Trenches shall be inspected for listed species at the beginning of each workday.

b) Potentially Significant Impact Unless Mitigated.

The Biological Resources Impact Analysis and for the project identified that the project site is located within USFWS-designated critical habitat for vernal pool fairy shrimp, which is Federally listed as a Threatened Species. However, EAS conducted two (2) field surveys which confirmed that no vernal pools exist on the project site or the immediate area, and therefore no suitable habitat for vernal pool fairy shrimp is present on or near the site. The results of the field surveys were provided to a Senior Biologist at USFWS's Sacramento Valley District for their review. USFWS concurred with EAS's findings.

An ephemeral drainage exists near the northeast edge of the project, which supports the area containing Red Bluff dwarf rush to the east of the project site. The project design has already been modified by chamfering the northeast portion of the fenced enclosure to place all project elements beyond the high water mark for this drainage, which has been both mapped and marked in the field. A mitigation measure is included to avoid, and prevent any impacts to, the ephemeral drainage. No other sensitive natural communities exist within the project area.

Mitigation Measure #IV.8:
AVOIDANCE OF EPHEMERAL DRAINAGE: All construction material, equipment, and vehicles shall remain outside of the ephemeral drainage near the northeast corner of the project site. The high water mark for this drainage, previously flagged in the field, shall be further delineated consistent with **Mitigation Measure #IV.6.** At no time shall equipment, vehicles, materials, or personnel be allowed to adversely affect the ephemeral drainage.

c) Potentially Significant Impact Unless Mitigated.

The U.S. Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. USACE has regulatory jurisdiction pursuant to Section 404 of the federal Clean Water Act.

In addition to the avoiding the ephemeral drainage located at the northeast corner of the project site (addressed by **Mitigation Measure #IV.8** above), a second ephemeral drainage channel flows along the southern edge of the project site, adjacent to Ohm Road. This southern drainage channel is potentially jurisdictional under the USACE, Regional Water Quality Control Board (RWQCB), and CDFW. The access drive from Ohm Rd. to the proposed project site would include the

construction of a new culvert within that drainage channel. Since the proposed access road and utility line easement both intersect the above-mentioned ephemeral drainage feature, a jurisdictional delineation was required. The delineation study was prepared by EAS in March of 2023 (Wetland Screening and Jurisdictional Assessment for Nationwide Permit #18).

The result of the jurisdictional delineation determined that the ephemeral drainage feature did not meet the criteria of a wetland, and that no jurisdictional wetlands are present on or in the immediate vicinity of the project site. Based on that information, the report summarized that a Nationwide Permit under Section 404 would not likely be required. Additionally, since the project would only involve minor alterations to land, the Central Valley Region of the California Regional Water Quality Control Board (RWQCB), Redding Office, issued a CEQA Notice of Exemption for Clean Water Act Section 401 Water Quality Certification. However, the applicant will be required to comply with all provisions contained in State Water Resources Control Board Water Quality Order no. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters deemed to be outside of federal jurisdiction. Compliance with this requirement, including the purchase of 0.01 acres of Aquatic Resource in-lieu fee credit as mentioned in the RWQCB letter dated September 12, 2024, has been added as a mitigation measure.

Mitigation Measure #IV.9:
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS: The applicant shall comply with all applicable provisions contained in State Water Resources Control Board Water Quality Order no. 2004-0004-DWQ, "Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters deemed to be outside of federal jurisdiction". This shall include, but not be limited to, obtaining all required permits and the purchase of 0.01 acres of Aquatic Resource in-lieu fee credit as mentioned in the RWQCB letter dated September 12, 2024, or other compensatory mitigation as determined by the RWQCB.

d) Potentially Significant Impact Unless Mitigated.

The subject property is currently undeveloped grassland with substantially disturbed vegetation and heavily compacted bare ground. No small mammal burrows were identified in proposed project areas, and no portions of the proposed development footprint contain the important habitat suitability elements for any listed sensitive wildlife species. While the site is not within any migratory wildlife corridors; the vegetation located within the immediate vicinity of the proposed project site could provide suitable nesting habitat for ground nesting avian species. **Mitigation Measure #IV.3** would minimize impacts to migratory and/or nesting birds to Less Than Significant levels.

The proposed solid metal fencing around the dishes and ground-mounted equipment is required to exclude persons and wildlife from those areas which may result in exposure to RF emissions in excess of established FCC standards, as well as provide a solid visual screen for aesthetic purposes. With the small geographic area enclosed by the fence (less than 0.15 acres), combined with the lack of any desirable food, water, or habitat within the fenced area, any impact from the fence on wildlife movement will be Less Than Significant.

The project site will not be illuminated on a regular basis. Work lighting installed in the project will be full cutoff fixtures, and light use will be limited via a condition of approval to those times when maintenance personnel are actively on the site. Any impact on the movement of wildlife species will be Less Than Significant.

e) No Impact.

Other than Tehama County's Oak Tree Preservation Ordinance, there are no local policies or ordinances for the protection of biological resources. As there are no oaks within one mile of the project site, there will be no conflict with local policies or ordinances protecting biological resources.

f) Less Than Significant Impact.

The subject property is not located within any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan area. As mentioned previously, the subject property is situated within an area designated by the USFWS as critical habitat for the vernal pool fairy shrimp, a species that is Federally listed as a Threatened Species. Field surveys of the project site and surrounding area confirmed that there are no vernal pools present, and thus no suitable habitat for vernal pool fairy shrimp on the proposed project site. The USFWS

concurred with EAS's finding that the proposed project site is not within vernal pool habitat. Overall, construction of the proposed project would not be in conflict with any applicable habitat conservation or natural community conservation plan.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
V. CULTURAL RESOURCES Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

Cultural resources include: prehistoric and historic period archaeological sites; historical features, such as rock walls, flumes, cemeteries; and architectural features. Cultural resources consist of any human-made site, object (i.e., artifact), or feature that defines and illuminates our past. Often such sites are found in foothill areas, areas with high bluffs, rock outcroppings, areas overlooking deer migratory corridors, or near bodies of water.

A cultural resources assessment was conducted for this project by Environmental Assessment Specialists, Inc. (Cultural Resource Assessment, EAS, February 2024). This included a records search at the Northeast Information Center, a search of the Native American Heritage Commission's Sacred Lands File, and a site survey by a qualified archaeologist. All results were negative, with no record of any historic or prehistoric resources on the project site, and nothing discovered during the site survey. There are no buildings or structures, historic or otherwise, on the project site. According to the Northeast Information Center, the project area is considered to be low to moderately sensitive for cultural resources. The adopted 2009-2029 Tehama County General Plan Update addresses the need to protect and preserve historic and archeological resources in the County (Policy OS-10.1). Existing County regulations, found at TCMC 9.43.350, require that all work shall cease and a qualified archaeologist shall be contacted if any archaeological, cultural, prehistoric, protohistoric, or historic resources are encountered during construction. This requirement shall be emphasized via a condition of approval.

a) No Impact. Based on the results of the cultural resource assessment, the project would not cause substantial adverse change to any historical resource because the areas designated for development are currently void of structures. No known historical resources exist on or near the site.

b-c) Less Than Significant Impact. Although the site is considered to be low to moderately sensitive for cultural resources, there is a possibility that subsurface resources or remains could be uncovered during the development process. Existing County regulations, found at TCMC 9.43.350, implement standard protocols for stopping construction and contacting a qualified archaeologist in the event that such resources or remains are encountered, reducing any impact to a level that is less than significant. This existing code requirement will be emphasized via a condition of approval.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
VI. ENERGY Would the project:				
a) Result in potentially significant environmental impact to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

In 2008, California became the first state in the nation to include mandatory green building through the Title 24 California Green Building Standards Code (CAL Green Code). This groundbreaking step meant that every structure built in the state – whether a home, school, commercial building or other structure – would have to meet guidelines for energy and water efficiency, low emission flooring and building materials and more. The County is responsible for enforcing the energy conservation regulations, which also extends to building renovations. The Tehama County Building Dept. uses the most recently adopted version of Title 24. The County will continue to enforce the provisions of Title 24 of the California Administrative Code, which sets forth mandatory energy standards for new development. Any development that takes place at this site will be required to comply with local/state laws and codes.

a) **No Impact.** This project would not generate environmental impact to wasteful, inefficient, or require unnecessary consumption of energy resources, during either project construction or operation. The County participates in the Green Building Code Waste Management Plan for all construction projects.

b) **No Impact**. The project will not cause any conflict with or obstruct a state or local plan for renewable energy or energy efficiency. All structures and improvements will be constructed to current CAL Green Code standards and Title 24 Energy standards.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
VII. GEOLOGY AND SOILS Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including 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?	☐	☐	☐	☒
ii) Strong Seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction and seiche/tsunami?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
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 landslides, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in table 18-1-B of the latest Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

Tehama County is relatively safe from earthquake activity because of its geographic location and lack of proximity to any active fault lines. Based on the California Geological Survey maps there is just the potential for minor seismic ground shaking secondary to earthquakes outside of Tehama County. The County may also experience minor ground shaking as a precursor to eruption of Mt. Lassen. The Alquist-Prilio Earthquake Fault Zoning Act restricts new construction in zones which soils are at risk of displacement;

however, Tehama County does not fall within this zone. All new construction in the county is required to meet California Building Code which addresses seismic design requirements, such as automatic earthquake gas shutoff valves in high-occupancy facilities and engineered assessment of potential soil and seismic impacts in the case of earthquake activity. Grading and excavation done by new developments are closely monitored by the Public Works Department and an engineered plan for these procedures is required.

a) **No Impact**

i. The project will not expose people or structures to the risk of harm or death involving rapture of known earthquake fault.

ii. The project will not expose people or structures to the risk of harm or death involving strong seismic shaking.

iii. The project will not expose people or structures to the risk of harm or death involving seismic related ground failure including liquefaction.

iv. The project will not expose people or structures to the risk of harm or death involving landslides.

b) **Potentially Significant Unless Mitigated**. The project will not result in unacceptable or substantial soil erosion or loss of topsoil that will significantly impact the environment due to the applicant's requirement to comply with Tehama County Public Works Department, which will ensure the project's design, including storm run-off and grading activity within the project area, will meet all local, state and federal standards/regulations. Therefore, with the incorporation of **Mitigation Measure #VII.1** below the project impact will be considered less than significant:

Mitigation Measure #VII.1:
GRADING PERMIT – The developer/applicant shall submit a Grading Plan and obtain a Grading Permit from Tehama County Public Works prior to the start of any work related to construction of the driveway, culvert, and/or communications site.

c-d) No Impact. The project is an unmanned facility on relatively flat land with stable soil, creating no risks to life or property.

e) **No Impact.** The project is an unmanned facility that will generate no wastewater.

f) **No Impact.** The disturbed area is less than 0.4 acres in an unremarkable part of the County with no record of unique paleontological resources or geologic features.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
VIII. GREENHOUSE GAS EMISSIONS				
Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒
b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other significant changes in climate (such as precipitation or wind) that last for an extended period of time. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. Global surface temperatures have risen by 0.74°C ± 0.18°C over the last 100 years (1906 to 2005). The rate of warming over the last 50 years is almost double that over the last 100 years. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO_2) and other greenhouse gases (GHGs) are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities that lead to an increase in the greenhouse effect.

As part of the 2009-2029 General Plan Update process, the County considered a wide range of policies and actions to reduce greenhouse gas emissions, and all feasible measures are included. However, they do not ensure that the County will meet its reduction goal, so the impact is considered cumulatively significant and unavoidable.

Section 15064 (h)(3)of the CEQA Guidelines specifies that a project's contribution to a cumulative effect may be found 'not cumulatively considerable' if the project will comply with the requirements in a previously approved plan or mitigation program, including plans or regulations for the reduction of greenhouse gas emissions. While Tehama County has not adopted a plan or mitigation program for the reduction of greenhouse gases as of the publication of this study, the potential additional development is consistent with the Tehama County General Plan whose EIR incorporated a statement of overriding considerations for cumulative impacts of greenhouse gas emissions.

a) **No impact.** Greenhouse gas (GHG) emissions contribute to the significant adverse environmental impacts of global climate change on a cumulative basis. This project would not generate enough GHG emissions to noticeably change the global average temperature whether it is measured directly, indirectly, or cumulative.

b) **No impact**. Tehama County implements AB32 and SB375 to acknowledge GHG emissions and its level of significance within environmental quality review. The project does not propose any GHG emission levels that would cause any adverse effect upon the state's air quality.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
IX. 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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The proposed project lies within an area of Tehama County which is primarily State Responsibility Area (SRA) for wildland fire suppression provided by the California Department of Forestry and Fire Protection (CAL FIRE). Structural fire protection and other related emergency services are the responsibility of the Tehama County Fire Department (TCFD) which is administered under a Cooperative Fire Protection Agreement with CAL FIRE. This project area is located in a Moderate Fire Hazard Severity Zone. The closest career staffed fire station is CAL FIRE Red Bluff/TCFD Fire Station 1, located at 604 Antelope Blvd., Red Bluff, CA 96080, approximately 7.8 miles northeast of the project site. The closest volunteer staffed fire station is TCFD Fire Station 9, located at 9580 Highway 99W, Gerber, CA 96035, approximately 7.5 miles southeast of the project site. The current Insurance Service Office (ISO) Public Protection Class Rating for this area is 10.

a-b) **Less than Significant Impact.** It is not presumed that the development would expose any persons to the storage or transport of hazardous materials. In addition, the project would not create a significant hazard to the public or the environment through the release of hazardous materials.

c) **No Impact.** The project site is not within one quarter mile of a school.

d) **No Impact.** The project site is not included on a list of hazardous material sites.

e) **No Impact.** The project is located within AIA Review Area 2 for the Red Bluff Airport as delineated in the 2015 Tehama County Airport Land Use Compatibility Plan. AIA Review Area 2 is concerned solely with noise-related impacts of airport operations on new development; as an unmanned facility, this project is insensitive to noise generated by aircraft operations.

f) **No Impact.** The project will not impair or interfere with an adopted emergency response plan.

g) **No Impact.** The project will not expose people or structures to a significant risk involving wildland fires. The facility is unmanned, and all structures and improvements will be constructed to current codes, including current Fire code.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
X. HYDROLOGY AND WATER QUALITY				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on-or off-site;	☐	☒	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impeded or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The primary source of water in unincorporated areas of Tehama County is groundwater. There are over 10,000 wells meeting the water needs of 59 percent of the population. The 2009-2029 General Plan recognizes the need to encourage population density growth in areas which can support further use of the water table and will not deplete the water source. Tehama County General Plan policy states that for all new large construction projects, proposed water supply and delivery system shall be in place before construction begins. Goals of the 2009-2029 Tehama County General Plan are set out to protect water resources in the county for future needs, encouraging water conservation and protection of groundwater supplies from urban pollutants in runoff.

a) **Less Than Significant Impact.** The project does not violate any water quality standards. Existing code requirements to notify and obtain any needed permits from the Army Corps of Engineers fully address this issue – see discussion for item c) below.

b) **No Impact.** The project will not substantially deplete groundwater supplies, interfere with groundwater recharge or impede sustainable groundwater management of the basin, as the project is an unmanned facility with no water demand and minimal paved area. The project will not violate any water quality standards or waste discharge requirements.

c. i-iv) **Potentially Significant Unless Mitigation Incorporated.** The project will not substantially alter the existing drainage pattern, and the project design has already been modified to avoid the ephemeral drainage to the northeast of the project area. Minor modifications to the drainage channel adjacent to Ohm Road (including installation of a culvert under the new driveway) are intended to preserve existing drainage patterns with minimal interference. Existing regulatory requirements to properly notify and obtain any needed permits from the Army Corps of Engineers, Regional Water Quality Control Board, and CDFW (e.g., 401, CGP, and LSA) will be emphasized via a condition of approval. Lastly, the requirement to obtain a grading permit from Tehama County Public Works found in **Mitigation Measure #VII.1** serves to adequately address issues regarding erosion, siltation, and water runoff.

d) **No Impact**. The project is not located within a seiche or tsunami zone and therefore there is no risk of releasing pollutants due to project inundation.

e.) **No impact**. The project will not substantially affect implementation of a water quality control plan or sustainable groundwater management plan. The project is an unmanned facility which creates no new water demand, with minimal paved areas affecting existing water quality.

		Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XI. LAND USE AND PLANNING					
Would the project:					
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The 2009-2029 Tehama County General Plan Update encourages growth in an organized, cohesive pattern through the use of existing major roadways, utilities, public facilities and the expansion of these services as they are needed. The 2009-2029 General Plan update anticipated this type of development and density in this area. Therefore, the project is not considered growth inducing and is consistent with the surrounding Land Use Designations and Zoning.

a.) ***No impact.*** The project will disturb approximately 0.4 acres, is located on the corner of an existing vacant property currently used for grazing, and will have no impact on the cohesiveness of any nearby community.

b.) ***No Impact.*** The project will not conflict with any applicable land use plan, policy etc. A communication facility can be constructed within the AG-2 zoning district with Use Permit approval.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XII. 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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

Tehama County offers an abundance of mineral resources derived from the extraction of non-metallic sources such as sand, gravel and volcanic cinder. The County currently recognizes 20 mineral excavation sites which are permitted in the county. Mineral excavation sites are identified and monitored by the State Geologist as Mineral Resource Zones (MRZs) or Scientific Zones in order to conserve mining resources for future use. These areas are to be protected and buffered from future development through buffer zones and setback requirements from non-compatible land use.

a - b) No Impact. There are no known mineral resources on the project site, and the project will not be extracting any mineral resources; therefore, the project would not result in the loss of availability of a known mineral resource of value.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
XIII. NOISE				
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The Noise Element of the Tehama County General Plan identifies land use compatibility standards for exterior community noise for a variety of sensitive land uses. In addition, Tehama County Noise Element standards are in coordination with Government Section 65302(f). The 2009-2029 Tehama County General Plan Update promotes the mitigation and control of noise causing sources. Sources of existing noise-producing areas have been identified as near airports (Corning and Red Bluff), near railways and busy roadways (I-5, Southern Pacific Railway). This project is located on the north side of Ohm Road between Paskenta Road and Shawn Lane in the community of Red Bluff, California.

a) **Less Than Significant Impact.** The project would not result in the exposure of persons to significant ambient noise levels in the vicinity of the project in excess of the standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Only temporary construction-related noise would be created, and hours of construction are regulated by Tehama County Code Chapter 17.77 "Noise Control". Once built, the unmanned facility will not create any significant noise. Compliance with existing County noise regulations will be emphasized via a condition of approval.

b) **No Impact.** The project is an unmanned facility which will generate no significant groundborne noise or vibration.

c) **No Impact.** The project is located within AIA Review Area 2 for the Red Bluff Airport as delineated in the 2015 Tehama County Airport Land Use Compatibility Plan. AIA Review Area 2 is concerned solely with noise-related impacts of airport operations on new development; as an unmanned facility, this project is insensitive to noise generated by aircraft operations.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
XIV. POPULATION AND HOUSING				
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The population for Tehama County was estimated to be 65,973 in 2020 and 63,463 in 2010, resulting in a total population growth of about 2,510 during this 10-year period (US Census), an average of 22 residents per square mile. The 2009-2029 General Plan recognizes population growth will occur and has implemented goals to prepare and accommodate this growth in nearly all of its elements (ex: Economic Development, Land Use, Transportation, Safety, Public Services and Open Space and Conservation). General Plan goals are set to encourage growth in an organized, cohesive pattern through the use of existing major roadways, utilities, public facilities and the expansion of these services as they are needed. The proposed project is not considered growth inducing and is consistent with the surrounding Land Use Designations and Zoning.

a.) **No impact**. The project is not considered growth inducing, as it is an unmanned facility which will not generate any additional demand for homes or businesses. No extensions of roads or other infrastructure will be needed by the project.

b.) **No impact.** The project site is undeveloped, and used for agricultural grazing. No people or housing will be displaced by construction of the project.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)

XV. PUBLIC SERVICES

a) 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 public services:

1) Fire protection?	☐	☐	☐	☒
2) Police protection?	☐	☐	☐	☒
3) Schools?	☐	☐	☐	☒
4) Parks?	☐	☐	☐	☒
5) Other public facilities?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The 2009-2029 Tehama County General Plan Update recognizes several goals to further meet the public service needs of Tehama County. The County works closely with related agencies in order to monitor and develop the need for local services. Goals of the 2009-2029 Tehama County General Plan Update are set with an objective to meet the goals quickly, efficiently and in a cost-friendly manner at the time services are needed or underfunded. The 2009-2029 Tehama County General Plan Update recognizes the possibility of future population growth and that public services will need to increase to meet these needs. Periodic evaluation of and communication with public service departments will ensure the proper growth of these services when the time comes whether that be through the construction of new facilities or increased funding to existing ones.

a)

1. **No Impact.** The project is an unmanned facility, and will not have adverse physical impacts on or physically alter fire protection and facilities. Should additional future development occur on the site, public service needs will be periodically reevaluated to consider any new population growth.

2. **No Impact**. The project is an unmanned facility, and will not have adverse physical impacts on or physically alter police protection and facilities. Should additional future development occur on the site, public service needs will be periodically reevaluated to consider any new population growth.

3. **No Impact.** The project is an unmanned facility. It will create no new demand for school facilities, and will generate no new trips to existing schools or other educational facilities. Should additional future development occur on the site, public service needs will be periodically reevaluated to consider any new population growth.

4. **No Impact.** The project is an unmanned facility. It will create no new demand for parks, and will generate no new trips to existing parks or other recreational facilities. Should additional future development occur on the site, public service needs will be periodically reevaluated to consider any new population growth.

5. **No Impact.** The project will not have adverse physical impacts on or physically alter any other public facilities. Should additional future development occur on the site, public service needs will be periodically reevaluated to consider any new population growth.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XVI. RECREATION				
a) Would the project increase the use of the existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or construction or require the expansion of recreational facilities which might have an adverse effect on the environment?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f..

Because of its geographic setting, Tehama County offers an abundance of recreational outlets within its several national parks and access to the Sacramento River. The 2009-2029 Tehama County General Plan encourages the growth of recreation facilities in order to meet the needs of a growing population. It is to be expected that with new development, the recreational needs of the population will grow, and new parks or facilities will need to be built, or existing ones be updated. However, this unmanned facility will generate no new demand for, or increase the use of, existing neighborhood and regional parks.

a-b.) ***No impact.*** The project is an unmanned facility. It will create no new demand for recreational facilities, and will generate no new trips to existing parks or other recreational facilities. No recreational facilities are proposed as part of the project.

		Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XVII. TRANSPORTATION					
Would the project:					
a)	Conflict with program plan, ordinance or policy addressing the circulation system, including taking into account all modes of transportation including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3,subdivision (b)?	☐	☐	☐	☒
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d)	Result in inadequate emergency access?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

a-b.) **No impact.** The project is an unmanned facility, and will generate a negligible amount of vehicular miles traveled once construction is complete.

c-d.) **No impact.** The project contains no unique geometric design features or incompatible uses which would create a hazard. The single improved driveway proposed will be adequate for emergency access purposes, with no secondary access being required.

	Potentially Significant Impact (PSI)	Potentially Significant Unless Mitigation Incorporated (PSUMI)	Less Than Significant Impact (LTSI)	No Impact (NI)
XVIII. TRIBAL CULTURAL RESOURCES				
Would the project:				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as eiter 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:				
i)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	☐	☐	☐	☒
ii)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, the lead agency shall consider the significance of the resource to a California Native American Tribe.	☐	☐	☒	☐

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

According to comments received from the Northeast Information Center, the project area is considered to be low to moderately sensitive for cultural resources. In addition, a cultural resources assessment was conducted for this project by Environmental Assessment Specialists, Inc. (Cultural Resource Assessment, EAS, February 2024). This included a records search at the Northeast Information Center, a search of the Native American Heritage Commission's Sacred Lands File, and a site survey by a qualified archaeologist. All results were negative, with no record of any historic or prehistoric resources on the project site, and nothing discovered during the site survey. Existing County regulations, found at TCMC 9.43.350, require that all work shall cease and a qualified archaeologist shall be contacted if any archaeological, cultural, prehistoric, protohistoric, or historic resources are encountered during construction. This requirement shall be emphasized via a condition of approval.

The adopted 2009-2029 Tehama County General Plan Update addresses the need to protect and preserve historic and archeological resources in the County (Policy OS-10.1) and the project will be conditioned to reflect that. There have been no California Native American tribes traditionally and/or culturally affiliated with the project area that requested consultation pursuant to Public Resources Code section 21080.3.1. To date, the tribes have not requested consultation for the purpose of preserving or mitigating impacts to places, features, and/or objects described in Sections 5097.9 and 5097.993 of the Public Resources Code that are located within project boundaries.

a-i) No Impact. The area designated for development does not contain any structures. The site does not contain any resources listed or eligible for listing on the California register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

a-ii) Less Than Significant Impact. Although the site is considered to be low to moderately sensitive for tribal cultural resources, there is a possibility that subsurface tribal cultural resources or remains could be uncovered during the development process. Existing County regulations, found at TCMC 9.43.350, implement standard protocols for stopping construction and contacting a qualified archaeologist in the event that such resources or remains are encountered, reducing any impact to a level that is Less Than Significant. This existing code requirement shall be emphasized via a condition of approval.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XIX. UTILITIES AND SERVICE SYSTEMS				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the wastewater treatment provider which 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?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

a) *No Impact.* The project will not cause significant effects on the environment due to new construction related to water, wastewater treatment or storm water drainage, electric power, natural gas or telecommunications facilities. Existing adjacent utilities (power and communications) will serve the unmanned facility via standard service connections.

b) *No Impact.* The project is an unmanned facility that will utilize no water and therefore create no new water demand. The minimal new paved area will not interfere with groundwater recharge or impede sustainable groundwater management of the basin.

c) ***No Impact.*** The project is an unmanned facility that will generate no new wastewater. There is no wastewater treatment provider within the vicinity of the project site.

d) ***No Impact.*** The project is an unmanned facility that will generate no new solid waste, and will not have any impact on the landfill's capacity to accommodate project needs.

e) ***No Impact.*** The project is an unmanned facility that will generate no new solid waste to be managed or reduced in compliance with federal, state and local statutes and regulations.

	Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XX. WILDFIRE-				
If located in or near state responsibility areas or lands classified as Very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plans?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled speed of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?	☐	☐	☐	☒

DISCUSSION:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The proposed project lies within an area of Tehama County which is primarily State Responsibility Area (SRA) for wildland fire suppression provided by the California Department of Forestry and Fire Protection (CAL FIRE). Structural fire protection and other related emergency services are the responsibility of the Tehama County Fire Department (TCFD) which is administered under a Cooperative Fire Protection Agreement with CAL FIRE. This project area is located in a Moderate Fire Hazard Severity Zone. The closest career staffed fire station is CAL FIRE Red Bluff/TCFD Fire Station 1, located at 604 Antelope Blvd., Red Bluff, CA 96080, approximately 7.8 miles northeast of the project site. The closest volunteer staffed fire station is TCFD Fire Station 9, located at 9580

Highway 99W, Gerber, CA 96035, approximately 7.5 miles southeast of the project site. The current Insurance Service Office (ISO) Public Protection Class Rating for this area is 10.

a) ***No Impact.*** The project will not substantially impair an adopted emergency response plan or emergency evacuation plan due to the nature and scope of this unmanned facility.

b) ***No Impact.*** The project is an unmanned facility, and will not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled speed of a wildfire.

c) ***No Impact.*** Existing regulations require that the project maintain defensible space at all times. No significant infrastructure such as new roads or utilities will be installed that could exacerbate fire risk. There are no trees or shrubs anywhere in the vicinity of the project site, and therefore no impacts to the environment from activities to maintain defensible space.

d) ***No Impact.*** The project area contains no slopes which could create a risk of downslope landslides. New impervious areas to be constructed as part of the project are less than 300 s.f., and will not alter existing drainage or runoff patterns. Downstream flooding potential will not be increased by the project.

		Potentially Significant Impact (PSI)	*Potentially Significant Unless Mitigation Incorporated (PSUMI)*	*Less Than Significant Impact (LTSI)*	*No Impact (NI)*
XXI.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
The following are Mandatory Findings of Significance in accordance with Section 15065 of the CEQA Guidelines.					
a)	**Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**	☐	☒	☐	☐
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.)**	☐	☐	☒	☐
c)	**Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?**	☐	☐	☒	☐

RESPONSE TO CHECK LIST:

The proposed project is a Small Fixed Wireless Facility that consists of five (5) communication structures, each measuring approximately 11 ft. 5 inches in height with an aimable 8 ft. diameter antenna dish, which will be automatically oriented to satellites passing overhead. The Communication Facilities associated equipment includes a raised concrete equipment pad and equipment, utility backboard and metered utility service. All telecom structures and associated equipment will be enclosed within a 10' corrugated metal fence (with the enclosed area modified to avoid the nearby ephemeral drainage), with utilities enclosed within an adjacent area surrounded by chain link fence with slats. The existing drainage channel adjacent to Ohm Road will be altered slightly by a proposed concrete swale for drainage, a culvert with headwalls, and utility trenching heading east from the communication complex. Entry to the small fixed wireless facility will be made via an access driveway over the proposed culvert. Total disturbed area will be approximately 0.4 acres, and total onsite impervious surface area (in the form of concrete equipment pads) will be less than 300 s.f.

The project will not conflict with any applicable land use plan, policy etc. The project does not propose any new development on the property or interference with the existing agricultural operation. Project requires a Use Permit in order to operate at the project site. A Use Permit is required to establish a communication facility in Tehama County pursuant to TC Code Section 17.71.070, which will incorporate conditions that will help avoid or mitigate any environmental effect. Therefore, the project will have a less than significant effect on the environment if the Use Permit is approved.

The proposed project lies within an area of Tehama County which is primarily State Responsibility Area (SRA) for wildland fire suppression provided by the California Department of Forestry and Fire Protection (CAL FIRE). Structural fire protection and other related emergency services are the responsibility of the Tehama County Fire Department (TCFD) which is administered under a Cooperative Fire Protection Agreement with CAL FIRE. This project area is located in a Moderate Fire Hazard Severity Zone. The closest career staffed fire station is CAL FIRE Red Bluff/TCFD Fire Station 1, located at 604 Antelope Blvd., Red Bluff, CA 96080, approximately 7.8 miles northeast of the project site. The closest volunteer staffed fire station is TCFD Fire Station 9, located at 9580 Highway 99W, Gerber, CA 96035, approximately 7.5 miles southeast of the project site. The current Insurance Service Office (ISO) Public Protection Class Rating for this area is 10.

As indicated below and based on the information contained in this environmental document the project will need to incorporate and apply 10 mitigation measures in order to reduce impacts to Biological Resources, Geology and Soil, and Hydrology and Water Quality to levels which are Less Than Significant.

a) **Potentially Significant Unless Mitigation Incorporated.** With incorporation of the proposed mitigation measures, the project's impacts on the environment, fish and wildlife habitat, and rare or endangered plant and animal species will be reduced to a level which is Less Than Significant. Specifically, mitigation measures include: Biological Resources MM # IV.1 through IV.9 (for a detailed discussion please see Biological Resources, Section IV); and Geology and Soils MM # VII.1 (for a detailed discussion please see Geology and Soils, Section VII, and Hydrology and Water Quality, Section X).

b) **Less than Significant Impact.** Cumulative impacts of the project have been considered and based on the size, location and use have been determined to be Less Than Significant impacts on the environment and the county.

c) **Less than Significant Impact.** The project does not have environmental effects that will cause substantial adverse effects on human beings. Existing County regulations, found at TCMC 9.43.350, implement standard protocols for stopping construction and contacting a qualified archaeologist in the event that subsurface cultural resources or human remains are encountered, reducing any impact to a level that is Less Than Significant.

Project Sponsor(s) Incorporation of Mitigation into Proposed Project

I/We have reviewed the Initial Study for the VB Edge, LLC (Galarza) Communication Facility Use Permit (UP 23-02) application and particularly the mitigation measures identified herein. I/We hereby modify the applications on file with the Tehama County Planning Department to include and incorporate all mitigations set forth in this Initial Study.

_____	8/03/26
Project Sponsor/Project Agent	Date
_____	_____
Project Sponsor/Project Agent	Date

PERSONS AND ORGANIZATIONS CONSULTED

This section identifies those persons who prepared or contributed to preparation of this document. This section is prepared in accordance with Section 15129 of the CEQA Guidelines.

A. COUNTY OF TEHAMA

- Tehama County Planning Department
- Tehama County Air Pollution-Control District
- Tehama County Fire Department
- Tehama County Public Works Department
- Tehama County Environmental Health Department
- Tehama County Air Pollution Control District
- Tehama County's Surface Mining Reclamation Act (SMARA)

B. OTHER AGENCIES/ORGANIZATIONS

- California Department of Fish and Wildlife
- United States Fish and Wildlife Service
- Army Corps of Engineers
- Regional Water Quality Control Board
- Northeast Information Center

C. REFERENCES

1. Tehama County General Plan Update 2009-2029
2. Tehama County Zoning Ordinance
3. Tehama County Grading Ordinance
4. Tehama County Williamson Act Program
5. Tehama County Preserve Security Maps
6. Tehama County Environmental Health Provisions & Regulations
7. Tehama County Air Pollution Control Guidelines
8. Alquist-Priolo Geological Maps
9. Alquist-Priolo Earthquake Fault Zoning Act
10. Tehama County's Surface Mining Reclamation Act (SMARA)
11. Tehama County 2015 Airport Land Use Compatibility Plan
12. California Department of Conservation Farmland Maps
13. Wetland Screening and Jurisdictional Assessment for Nationwide Permit #18, Environmental Assessment Specialists (EAS), March 14, 2023
14. Biological Resources Impact Analysis, Environmental Assessment Specialists (EAS), December 29, 2022 [Revised: February June 15, 2024]
15. Supplemental Late Season Plant Survey, ENPLAN, August 15, 2024

MITIGATION MONITORING PROGRAM

USE PERMIT # 23-02
TEHAMA COUNTY PLANNING DEPARTMENT
444 Oak Street
Courthouse Annex, Room I
Red Bluff, CA 96080

The size and complexity of the proposed project require development of a formal mitigation monitoring program to ensure that monitoring is carried out in all stages. Monitoring is divided into three categories related to the timing of activities and implementation of mitigations.

1. Pre-Construction Mitigations (PC). These are activities that precede any actual land disturbance. Included among these mitigations are the development of drainage, erosion control and tree management plans. Also included are the delineation of any wetlands that may be subject to development impact and the establishment of Environmentally Sensitive Areas (ESAs) or Zones (ESZs) around archaeological sites and specimen oak trees.

2. Construction-Related Mitigations (DC). These include implementation of the drainage and erosion control plans, building setbacks from sensitive areas, and all other measures required to reduce the impacts of construction and development.

3. Ongoing Mitigations (OG). These include the maintenance programs necessary to ensure long-term control of erosion, protection of surface water quality in runoff, and protection of the wildlife and wildlife habitat resources on the project.

Monitoring will be the responsibility of various county and state agencies, although the physical inspections may be delegated to a private company or individuals chosen by these agencies and/or an environmental coordinator. All costs of mitigation monitoring will be borne by the developers, who are usually required to deposit money with the county or state agency in advance of the required monitoring effort.

The following environmental mitigation measures were incorporated in the conditions of approval for this project in order to mitigate identified environmental impacts to a level of insignificance. For tentative maps, some mitigation measures must be completed prior to map recordation (PR). Others are implemented during permitting stages following map recordation (AR), or are ongoing mitigation measures. A completed and signed checklist for each mitigation measure indicates that the mitigation measure has been complied with and implemented, and fulfills the monitoring requirements with respect to Assembly Bill 3180 (PRC Section 21081.6).

Currently, the applicant is seeking approval of __Use Permit #23-02.__ A description of the pending project can be found in the initial study. Questions about this monitoring program should be directed to the Tehama County Planning Department.

ACRONYMS USED

CDFW	California Department of Fish and Wildlife
CalTrans	California Department of Transportation
CDF	California Department of Forestry
CSD	Community Services District
CVRWQCB	Central Valley Regional Water Quality Control Board
DEV	Developer
HOA	Homeowners' Association
TC	Tehama County
TCAPCD	Tehama County Air Pollution Control District
TCBD	Tehama County Building Department
TCEH	Tehama County Environmental Health
TCFD	Tehama County Fire Department
TCPD	Tehama County Planning Department
TCPWD	Tehama County Public Works Department
USACOE	United States Army Corps of Engineers

Monitoring Phases

PC Pre-Construction

DC During Construction

OG Ongoing

BP During Building Permit Approval

Subdivision Map Phase (Tentative Maps)

PR Prior to Map Recordation

AR After Map Recordation

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Impact Unless Mitigated.**

The 2009-2029 Tehama County General Plan Update maps and defines areas of important biological resources. The County works closely with the California Department of Fish and Wildlife to protect biological resources and mitigate effects that future growth will have on these resources and their habitat. Therefore, to mitigate to levels which are less than significant the potential impacts identified in the special studies referenced in Section C at the end of this Initial Study, as well as correspondence and documentation from various regulatory agencies, the mitigation measures listed in this section will be incorporated.

Much of the information provided in this section is based on the results of a biological assessment that was conducted for the proposed project (Biological Resources Impact Analysis, Environmental Assessment Specialists (EAS), December 29, 2022 [Revised: February June 15, 2024]). The biological assessment was conducted in accordance with the requirements set forth in Tehama County Codes 17.70.020(B)&(C) & 17.70.040(A), (B), and (C).

Additionally, correspondence with the various wildlife agencies such as the U.S. Fish and Wildlife Service (USFW), California Department of Fish and Game (CDFG) and the US Army Corps of Engineers (ACOE) resulted in the need for other specific studies (i.e., focused plant survey report and wetland delineation report) which are listed in Section C and have also been incorporated by reference.

Sensitive Plant Species – The database search (CNDDB, CDFW, USFW) identified 17 special status plant species in the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles. The biological assessments performed for this project (see Section C) narrowed that list down to four sensitive plant species that were potentially present on or near the project site: Ahart's paronychia (*Paronychia ahartii*), Dwarf downingia (*Downingia pusilla*), Hendersons bent grass (*Agrostris hendersonii*), and Red Bluff dwarf rush (*Juncus leiospermus* var. *leiospermus*).

Initial surveys revealed none of these species present; however, based on the observation of a single spurge during a visit from CDFW staff, a supplemental late season plant survey was performed in August 2024. This supplemental survey revealed approximately two dozen examples of Red Bluff dwarf rush within the ephemeral drainage to the east of the project area, outside the area which will be disturbed. (The observed spurge was determined to be non-status Valley spurge, rather than special-status Stony Creek spurge.) The supplemental survey also determined that conditions were present for Dwarf downingia to occur in the same location as the Red Bluff dwarf rush, but that Dwarf downingia would not have been discernible in a survey at that time of year. The proposed avoidance and mitigation measures will reduce potential impacts to both plants, since they would occur in the same area.

Sensitive Wildlife Species – The database search (CNDDB, CDFW, USFW) for the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles identified 52 sensitive wildlife species. Of these, only two were determined likely to occur on the non-native grassland habitat found in the project area: Crotch's bumble bee (*Bombus crotchii*) and Vernal pool fairy shrimp (*Branchinecta lynchi*). The project site also contains marginally suitable foraging habitat for three bird species: Swainson's hawk, burrowing owl, and white-tailed kite. Avoidance and mitigation measures are proposed to limit potential impacts to all these species.

Crotch's bumble bee – According to the Biological Resources Impact Analysis (see Section C) the project site is within the known range of Crotch's bumble bee, which in 2022 was reinstated as a Candidate for protection under the California Endangered Species Act (CESA). No Crotch's bumble bee or other species of bumble bees were observed during multiple onsite field surveys (including June 2023, April 2024, and May 2024), and the non-native grassland covering the proposed project site is considered "low quality habitat" for Crotch's bumble bee. Implementation of several biology-related Best

Management Practices that have been added to the project would limit potential impacts to special status species, including impacts to Crotch's bumble bees.

Vernal pool fairy shrimp – The project site is within an area designated by the U.S. Fish and Wildlife Service (USFWS) as critical habitat for the vernal pool fairy shrimp, a species that is Federally listed as a Threatened Species. Observations made during two field surveys confirmed that there are no vernal pools and no suitable habitat for vernal pool fairy shrimp on or adjacent to the project site. The project would not result in any adverse impacts to native habitats that constitute primary constituent elements (PCEs) as described in the critical habitat final rule. Consultation between EAS and the USFWS resulted in USFWS personnel concurring with EAS's determination that no vernal pool habitat is present; therefore, construction of the proposed facility would have no adverse impacts to vernal pool shrimp species or critical habitat elements.

Burrowing owl – Burrowing owl is a CESA candidate species, and is found in grassland habitats, lowland scrub, agricultural land, and open areas as a year-long resident. As a critical habitat feature, they require rodent or other fossorial burrows for roosting and nesting cover, with the preferred burrow being the California ground squirrel (*Spermophilus beecheyi*). They may also use pipes, culverts, and nest boxes in locations where burrows are scarce. Reasons for their decline include habitat destruction, insecticide, poisoning, rodenticide, and shooting. A habitat assessment for burrowing owl was conducted during the focused plant survey efforts. No burrowing owl or sign of burrowing owl were observed during the habitat assessment surveys. No suitable burrows were observed on or within the vicinity of the project site, and the proposed facility is not expected to adversely affect burrowing owl. A requirement for a pre-construction clearance survey within 7 days of any construction activities to confirm that no burrowing owls are present has been added as a mitigation measure.

Swainson's hawk and white-tailed kite - Swainson's hawk is a CDFW listed Threatened species, while white-tailed kite is a CDFW Fully Protected species. Both species nest in oak savannahs and forage for voles in meadows and grasslands. No trees or potential nesting habitat for these species exist anywhere near the project site, although the site contains marginally suitable foraging habitat for these species. A habitat assessment for white-tailed kite and Swainson's hawk was conducted in both April and May of 2024 during the focused plant survey effort. No white-tailed kite or Swainson's hawk were observed on or within the vicinity of the site during the focused survey. No trees of any type are within 600 feet of the project site, and the nearest native oak tree is more than a mile to the north.

Overall, the project site contains marginally suitable foraging habitat for Swainson's hawk, burrowing owl, and white-tailed kite. Impacts to foraging habitat would be limited in size and would be considered less than significant on a local or regional basis. Adherence to Best Management Practices which have been added as mitigation measures will ensure that the installation of the proposed facility would limit potential impacts to sensitive raptor species to less than significant levels.

Sensitive Plant Communities - The records search identified five (5) sensitive plant communities that occur within the USGS *West of Gerber, California* topographic quadrangle and adjacent quadrangles. This includes the following:

- Great Valley cottonwood riparian forest
- Great Valley mixed riparian forest
- Great Valley oak riparian forest
- Great Valley willow scrub
- Northern hardpan vernal pool

None of the listed sensitive plant communities occur on or adjacent to the project site; therefore, no sensitive plant communities would be adversely affected by the proposed project.

Migratory Birds / Nesting Birds - The Migratory Bird Treaty Act (MBTA) protects nearly all common wild birds found in the United States, with resident wildlife birds being managed separately by each state. California Fish and Game (CFG) Code 3503 makes it illegal to destroy any birds' nest or any birds' eggs that are protected under the MBTA. CFG Code 3503.5 further protects all birds of prey, such as hawks and owls, and their eggs and nests from any form of take. No avian nests or nesting activity were observed during field surveys. However, the low-lying grasslands within the project area and the surrounding vicinity could provide suitable avian nesting habitat for ground-nesting species.

MITIGATION MEASURES

Mitigation Measure #IV.1:
EMPLOYEE TRAINING: To minimize potential impacts to potentially sensitive biological resources, a qualified biologist will train all project staff regarding habitat sensitivity, identification of special status species, and required practices before the start of construction. The training shall include the general measures that are being implemented to conserve these species as they relate to the project, the penalties for non-compliance, and the boundaries of the project area. A fact sheet or other supporting materials containing this information will be prepared and distributed.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note:_____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.2:
SENSITIVE PLANT AVOIDANCE: A 50-foot buffer shall be established around the area containing the sensitive plant species Red Bluff dwarf rush (which may also contain Dwarf downingia) to the east of the project site, as depicted on the August 2024 late season plant survey. No vehicles, equipment, or materials shall be stored within this buffer area. The buffer shall be delineated and marked as directed by the monitoring biologist (see **Mitigation Measures #IV.4 and #IV.6**). Temporary minor encroachments into the buffer may be approved by the monitoring biologist upon a determination that said encroachment will not adversely affect the sensitive plant species.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note:_____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.3:
NESTING BIRD AVOIDANCE / SURVEY: Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey, no more than 7 days prior to the commencement of construction activities, to confirm that no burrowing owls or other ground-nesting birds or wildlife are present. Should an active nest be discovered during the survey, an appropriate non-disturbance buffer shall be established around each nest in consultation with CDFW and USFWS and in compliance with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.4:
CONSTRUCTION MONITORING: A qualified biologist will monitor all ground disturbing construction activity. The biologist shall complete a daily log summarizing activities and environmental compliance.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.5:
MINIMIZE AREA OF DISTURBANCE: Permanent and temporary construction disturbances and other types of project-related disturbance to shall be minimized to the maximum extent practicable and confined to the project site. To minimize temporary disturbances, all project-related vehicle traffic shall be restricted to established roads, construction areas, and specifically designated access areas when possible. These areas also should be included in preconstruction surveys and, to the maximum extent possible, should be established in locations disturbed by previous activities to prevent further adverse effects.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.6:
DELINEATION AND MARKING OF SENSITIVE HABITAT: Sensitive habitat areas shall be delineated with high visibility flagging or fencing to prevent encroachment of construction personnel and equipment into any sensitive areas during project work activities. At no time shall equipment or personnel be allowed to adversely affect areas outside the project site.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

See discussion for **Mitigation Measure #IV.1.**

MITIGATION MEASURES

Mitigation Measure #IV.7:
WILDLIFE PROTECTION AND ENTRAPMENT PREVENTION: Items that could pose a risk of wildlife entanglement such as ropes, cables, lines, etc. will be kept secure. Pipes, culverts, and similar materials will be stored to prevent wildlife species from using these as temporary refuges, and these materials must be inspected each morning for the presence of animals prior to being moved. All excavated areas greater than 6 inches deep will be provided with one or more escape ramps constructed of earth fill or wooden planks at the end of each workday. If escape ramps cannot be provided, then holes or trenches will be covered with plywood or other hard material. Trenches shall be inspected for listed species at the beginning of each workday.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

The Biological Resources Impact Analysis and for the project identified that the project site is located within USFWS-designated critical habitat for vernal pool fairy shrimp, which is Federally listed as a Threatened Species. However, EAS conducted two (2) field surveys which confirmed that no vernal pools exist on the project site or the immediate area, and therefore no suitable habitat for vernal pool fairy shrimp is present on or near the site. The results of the field surveys were provided to a Senior Biologist at USFWS's Sacramento Valley District for their review. USFWS concurred with EAS's findings.

An ephemeral drainage exists near the northeast edge of the project, which supports the area containing Red Bluff dwarf rush to the east of the project site. The project design has already been modified by chamfering the northeast portion of the fenced enclosure to place all project elements beyond the high water mark for this drainage, which has been both mapped and marked in the field. A mitigation measure is included to avoid, and prevent any impacts to, the ephemeral drainage. No other sensitive natural communities exist within the project area.

MITIGATION MEASURES

Mitigation Measure #IV.8:
AVOIDANCE OF EPHEMERAL DRAINAGE: All construction material, equipment, and vehicles shall remain outside of the ephemeral drainage near the northeast corner of the project site. The high water mark for this drainage, previously flagged in the field, shall be further delineated consistent with **Mitigation Measure #IV.6.** At no time shall equipment, vehicles, materials, or personnel be allowed to adversely affect the ephemeral drainage.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

The U.S. Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria. USACE has regulatory jurisdiction pursuant to Section 404 of the federal Clean Water Act.

In addition to the avoiding the ephemeral drainage located at the northeast corner of the project site (addressed by **Mitigation Measure #IV.8** above), a second ephemeral drainage channel flows along the southern edge of the project site, adjacent to Ohm Road. This southern drainage channel is potentially jurisdictional under the USACE, Regional Water Quality Control Board (RWQCB), and CDFW. The access drive from Ohm Rd. to the proposed project site would include the construction of a new culvert within that drainage channel. Since the proposed access road and utility line easement both intersect the above-mentioned ephemeral drainage feature, a jurisdictional delineation was required. The delineation study was prepared by EAS in March of 2023 (Wetland Screening and Jurisdictional Assessment for Nationwide Permit #18).

The result of the jurisdictional delineation determined that the ephemeral drainage feature did not meet the criteria of a wetland, and that no jurisdictional wetlands are present on or in the immediate vicinity of the project site. Based on that information, the report summarized that a Nationwide Permit under Section 404 would not likely be required. Additionally, since the project would only involve minor alterations to land, the Central Valley Region of the California Regional Water Quality Control Board (RWQCB), Redding Office, issued a CEQA Notice of Exemption for Clean Water Act Section 401 Water Quality Certification. However, the applicant will be required to comply with all provisions contained in State Water Resources Control Board Water Quality Order no. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters deemed to be outside of federal jurisdiction. Compliance with this requirement, including the purchase of 0.01 acres of Aquatic Resource in-lieu fee credit as mentioned in the RWQCB letter dated September 12, 2024, has been added as a mitigation measure.

MITIGATION MEASURES

Mitigation Measure #IV.9:
STATEWIDE GENERAL WASTE DISCHARGE REQUIREMENTS: The applicant shall comply with all applicable provisions contained in State Water Resources Control Board Water Quality Order no. 2004-0004-DWQ, "Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters deemed to be outside of federal jurisdiction". This shall include, but not be limited to, obtaining all required permits and the purchase of 0.01 acres of Aquatic Resource in-lieu fee credit as mentioned in the RWQCB letter dated September 12, 2024, or other compensatory mitigation as determined by the RWQCB.

Implementing Agency: Project applicant

Monitoring Agency: Regional Water Quality Control Board

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

California Department of Fish and Wildlife

MITIGATION MONITORING PROGRAM

ISSUE: Biological Resources

IMPACT(S): **Potentially Significant Unless Mitigation Incorporated**

The subject property is currently undeveloped grassland with substantially disturbed vegetation and heavily compacted bare ground. No small mammal burrows were identified in proposed project areas, and no portions of the proposed development footprint contain the important habitat suitability elements for any listed sensitive wildlife species. While the site is not within any migratory wildlife corridors; the vegetation located within the immediate vicinity of the proposed project site could provide suitable nesting habitat for ground nesting avian species. **Mitigation Measure #IV.3** would minimize impacts to migratory and/or nesting birds to Less Than Significant levels.

MITIGATION MEASURES

Mitigation Measure #IV.3:
NESTING BIRD AVOIDANCE / SURVEY: Prior to ground disturbing activities, a qualified biologist shall conduct a pre-construction survey, no more than 7 days prior to the commencement of construction activities, to confirm that no burrowing owls or other ground-nesting birds or wildlife are present. Should an active nest be discovered during the survey, an appropriate non-disturbance buffer shall be established around each nest in consultation with CDFW and USFWS and in compliance with Fish & Game Code Sections 3503 and 3503.5 and the Migratory Bird Treaty Act.

Implementing Agency: Project applicant

Monitoring Agency: California Department of Fish and Wildlife

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: PC/OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

Tehama County Public Works Department

MITIGATION MONITORING PROGRAM

ISSUE: Geology and Soils

a) IMPACT(S): **Potentially Significant Impact Unless Mitigation Incorporated** The project will not result in unacceptable or substantial soil erosion or loss of topsoil that will significantly impact the environment due to the applicant's requirement to comply with Tehama County Public Works Department, which will ensure the projects design, including storm run-off and grading activity within the project area will meet all local, state and federal standards/regulations. Therefore, with the incorporation of Mitigation Measure #VII.1 below, the project will be considered less than significant:

MITIGATION MEASURES

Mitigation Measure #VII.1:
Grading Permit. The developer/applicant shall submit a Grading Plan and obtain a Grading Permit from Tehama County Public Works prior to the start of any work related to construction of the driveway, culvert, and/or communications site.

Implementing Agency: Project applicant

Monitoring Agency: Tehama County Public Works Department / Regional Water Quality Control Board

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____

Monitoring Agency:

Tehama County Public Works Department

MITIGATION MONITORING PROGRAM

ISSUE: Hydrology and Water Quality

IMPACT(S): **Potentially Significant Impact Unless Mitigation Incorporated** The project will not substantially alter the existing drainage pattern, and the project design has already been modified to avoid the ephemeral drainage to the northeast of the project area. Minor modifications to the drainage channel adjacent to Ohm Road (including installation of a culvert under the new driveway) are intended to preserve existing drainage patterns with minimal interference. Existing regulatory requirements to properly notify and obtain any needed permits from the Army Corps of Engineers, Regional Water Quality Control Board, and CDFW (e.g., 401, CGP, and LSA) will be emphasized via a condition of approval. Lastly, the requirement to obtain a grading permit from Tehama County Public Works found in **Mitigation Measure #VII.1** serves to adequately address issues regarding erosion, siltation, and water runoff.

MITIGATION MEASURES

Mitigation Measure #VII.1:
Grading Permit. The developer/applicant shall submit a Grading Plan and obtain a Grading Permit from Tehama County Public Works prior to the start of any work related to construction of the driveway, culvert, and/or communications site.

Implementing Agency: Project applicant

Monitoring Agency: Tehama County Public Works Department / Regional Water Quality Control Board

Funding Source: Developer/Applicant

Subdivision Map Phasing: N/A

Phase of Monitoring: OG

Performance Standards (standard for success): As determined by Monitoring Agencies.

Additional Note: _____

COMPLIANCE VERIFIED (see attached verification report)

DATE _____