

Initial Study

UP 13-001/West Portal Wireless Telecommunications Facility June Lake, California

August 2013

PREPARED BY:

**Mono County Community Development Department
Post Office Box 347
Mammoth Lakes, CA 93546
(760) 924-1807**

INITIAL STUDY

I. INTRODUCTION

The California Environmental Quality Act (CEQA) requires public agencies to consider the effects that development projects will have on the environment. The Mono County Community Development Department has prepared an Initial Study to identify potential environmental impacts related to this project. Significant environmental effects are not anticipated if the project is carried out as proposed and designed.

II. PROJECT INFORMATION

1. Project Title:

UP 13-001/West Portal Wireless Telecommunications Facility

2. Lead Agency Name and Address

Mono County Community Development Department
Planning Division
P.O. Box 347
Mammoth Lakes, CA 93546
(760) 924-1800
Contact Person: Heather deBethizy

3. Project Sponsor's Name and Address:

SBA Towers IV, LLC, Florida
c/o Complete Wireless Consulting
2009 V Street
Sacramento, CA 95818
(916) 217-7513
Contact Person: David Downs

4. Property Owners:

June Lake Public Utility District
2380 State Highway 158
June Lake, CA 93529
(760) 648-7778

5. General Plan Land Use Designation/Zoning:

Public and Quasi-Public Facilities/PUD (PF/PUD)

6. Other Public Agencies Whose Approval May Be Required:

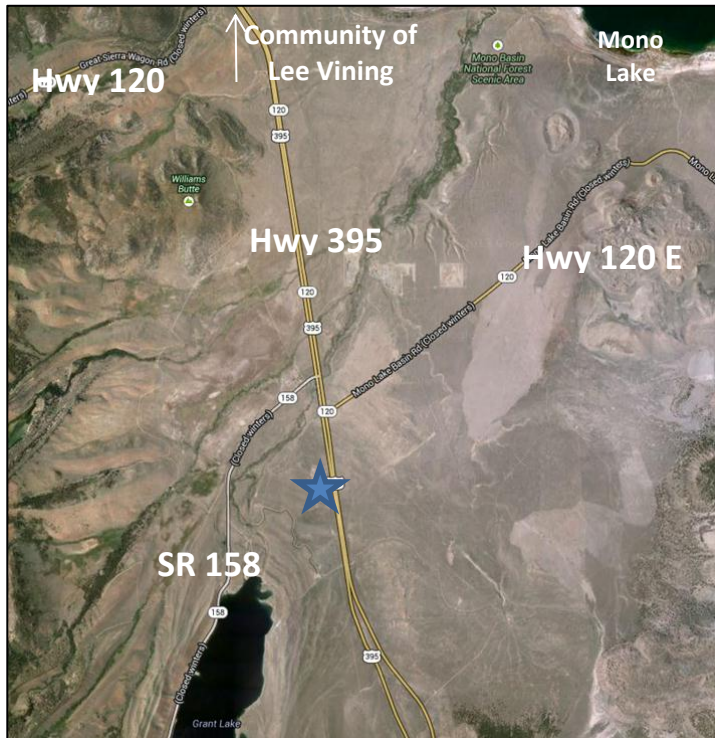
Mono County Community Development Department:
Building Permit

Mono County Department of Public Works:
Grading Permit

Mono County Department of Environmental Health:
Hazardous Materials Business Plan (for standby diesel generator and 132 gallon fuel tank)

7. Description of Project:

The proposed project is located at the June Lake Public Utility District (JLPUD) West Portal wastewater treatment site, located in the southwest portion of the Mono Basin, west of US 395, approximately one mile south of the northerly intersection of US 395 and Hwy. 158. The property is a 82.52± acre parcel (APN 140-020-01000) and is currently developed with sewage treatment ponds, metal shop buildings, utility lines, and an access road. Sewage treatment facilities, including metal shop buildings and wastewater treatment ponds, are contained within an approximately 3.8± acre area that is fenced in. Additional ponding areas are located to the immediate north of the fenced in area; those ponding basins are surrounded by earthen berms.



Proposed Project Location, APN 140-020-010

Use Permit Application 13-001/West Portal Wireless Facility would allow for the development, operation, and maintenance of a wireless telecommunications facility on the parcel. The site would improve cell phone coverage to the June Lake community and to travelers north and south along US 395. Verizon will be the initial user of the site.

The wireless facility would be located on a 2,500 square foot leased area located adjacent to the northwest corner of the currently fenced area (see Figures 1 and 2, Site Plan and Site Detail). The lease area would be surrounded by a 6-foot tall, chain link fence with barbed wire, with a 12-foot wide metal gate. The 50' x 50' lease area would include one multi-carrier 60-foot tall wireless communications monopole designed as a collocation facility, engineered to hold up to three carriers' antenna arrays.

The monopole will have three proposed carrier antenna sectors with four proposed antennas per sector (see Figure 3, Site Elevations). The monopole would be 60 feet tall with the top of the topmost antenna arrays located 53 feet above ground level. Each antenna mount will allow for up to four panel type antennas on each of three separate sectors facing approximately 120 degrees apart. The plan also provides for two future wireless microwave dishes to be located below the bottom antenna array, along with two proposed GPS antennas. The actual mounting position, number of antennas, and heights on the towers will be finalized following completion of leases with carriers; those details will be reflected on building permit drawings.

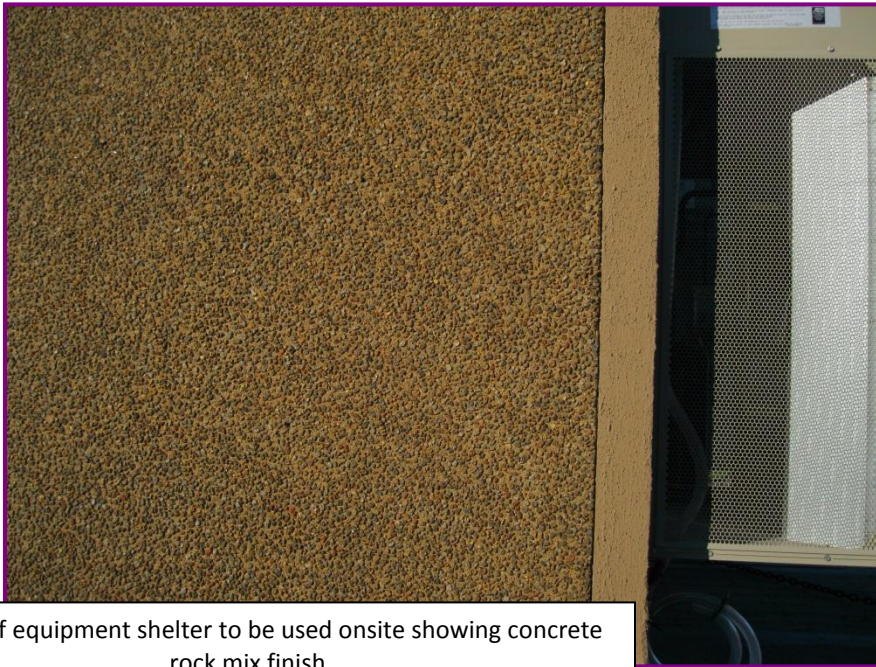
The fenced lease area has been designed to include the following (see Figure 2, Site Detail):

- 12' x 16' Verizon pre-fabricated equipment shelter with an 8' x 4' concrete stoop;
- UL2200 certified 30 kw standby diesel generator and UL142 certified 132 gallon fuel tank on a 6' x 13' concrete pad;
- Two 15' x 25' lease areas for future tenants;
- Telecommunications boxes mounted on the inside of the wall; and
- One 60' monopole.

The equipment shelter will be a prefabricated shelter with a concrete rock mix finish. The fence around the leased area will be a 6-foot tall chain link fence with barbed wire and a 12-foot wide metal gate. The monopole, equipment shelter, and fence will be painted colors that blend in with the surrounding area, likely a dark brown or dark grey/green. Disturbed areas will be revegetated in compliance with Mono County landscaping and revegetation requirements.



Sample of equipment shelter to be used onsite. The door and vent covers will be painted a dark color to match the siding color. Shelters will be set on concrete pads.



Sample of equipment shelter to be used onsite showing concrete rock mix finish.

Access will be provided from US 395 on an existing access road. The proposed on-site access will be a 20-foot wide gravel road (see Figure 2, Site Detail).

The parcel will connect to existing electrical power and telephone service. All new utility

lines will be installed underground in compliance with Mono County Land Development Regulations; a utility trench approximately 6 feet wide and 200 feet long will be required to connect the facility to the existing power lines. No other utilities will be required for the site.

Backup batteries will power the equipment for 6-8 hours during power outages. During longer outages, an on-site diesel generator will be used by Verizon. Project conditions will limit the project to one on-site generator. The generator meets all EPA and California Air Resources Board emissions standards.

The site will include an information sign as required by governing authorities; signs will be placed on the metal gate. All signs will comply with current FCC and OSHA guidelines. Sign dimensions, text size and placement and coloring will meet current ANSI standards for information signage.

Once construction is complete, the site will be unmanned. There will be no regular hours of operation and virtually no traffic to the site. The site is entirely self-monitored and alerts personnel to equipment malfunctions or breaches of security. Routine maintenance visits will occur approximately twice per month for each carrier, unless there is an emergency. Maintenance may occur less frequently in winter months and service providers may utilize snowmobiles or over-snow vehicles (OSV) to access the site when there is snow on the ground.

8. Surrounding Land Uses and Setting:

The property is located in the southwest corner of the Mono Basin, on the west side of US 395, approximately one mile south of the northerly junction of US 395 and Hwy 158 (see Figures 1 and 2). Surrounding parcels in all directions are owned by the Los Angeles Department of Water and Power. Those parcels are designated Open Space (OS) and are generally used by wildlife, for grazing, and for some dispersed recreational activities. The nearest surface waters are the Rush Creek return channel, which is located 1,750 feet to the west of the project site, and the Rush Creek riparian corridor, which at its closest is located 3,150 feet to the northwest of the project site.

III. 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 discussion on the following pages.

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

IV. DETERMINATION:

On the basis of this initial evaluation:

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

Signature _____ Date _____ Name _____

V. DISCUSSION OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

I. AESTHETICS. Would the project:

- a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact.

Visual Impact Overview

The project site is located west of US 395 in the southwest portion of the Mono Basin, on a relatively flat parcel at the base of the steeply sloping eastern flank of the Sierra Nevada mountains. The project vicinity is open and undeveloped, covered with low-growing Big Sagebrush Scrub. The sagebrush scrub extends to the base of the Sierra slopes. There are no trees on the project site, or in much of the surrounding area (see Figure 4, Existing Site Photos). The project parcel is developed with several metal buildings, fencing, roads, wastewater treatment ponds, and utility poles, including large transmission lines located between US 395 and the project site.

Vegetation to the north, west and south of the lease area is similar to that on-site, low-growing sagebrush scrub (see Figure 4, Existing Site Photos). There are no trees until higher elevations along the flank of the Sierra Nevada to the west, where there are large stands of aspen and pine trees. Due to the gain in elevation between the project area and the flank of the Sierra Nevada to the west, the trees located there will not appear directly behind the monopole in the background of scenic vistas when looking towards the site. The background when looking towards the site from most directions is of sagebrush scrub vegetation.

The overall impression, looking towards the site from most vantage points, is of an open site with low-growing vegetation that is uniform in cover, size, and color. The utility poles are visible in the foreground from most vantage points, as a manmade element in an otherwise natural-appearing landscape. Other components of development (roads, buildings, fencing) at the site are also visible to some extent, depending on the viewer's distance from the site. From some vantage points (Hwy 158 in the vicinity of Grant Lake, southbound US 395 north of the US 395/Hwy 120 junction), the site is either not visible or portions of it are shielded by topography.

Compliance with Scenic Combining District

The monopole would be visible from several viewpoints in the surrounding area, increasingly less so from farther distances. At its closest point, the project parcel is approximately 900 feet from US 395, which is designated as a scenic highway in this area. The project is at the edge of the Scenic Combining District (Land Development Regulations, Chapter 8) which regulates development along scenic highway corridors. The project complies with the development standards (Section 8.030) in the Scenic Combining District, i.e.:

- A. *Visually offensive land uses shall be adequately screened.*

The project site, including fencing, structures, and the monopole, will be shielded from views from US 395 by an existing metal shed on the site and, from certain vantage points, by topography. Looking toward the site from the west, from Hwy. 158, views of the site will be completely shielded by topography.

- B. *Earthwork, grading and vegetative removal shall be minimized.*

Grading and vegetative removal will be limited to the lease area and the utility corridor, as specified on the project plans.

- C. *All site disturbance shall be revegetated with plants in harmony with the surrounding environment.*

Disturbed areas outside of the lease area will be revegetated with native vegetation to emulate the surrounding environment. A landscape plan will be completed and submitted for the project in compliance with Mono County requirements.

- D. *Existing access roads shall be utilized whenever possible.*

An existing access road will be used.

- E. *Signs shall comply with the County Sign Regulations (Land Development Regulations, Chapter 7).*

Signs will comply with the sign regulations.

- F. *The design, color, and materials for buildings, fencing and other structures shall be compatible with the natural setting.*

The shed, fencing, and monopole will be painted a dark matte color to be compatible with the surrounding natural setting. Materials for the shed, fencing, and monopole will also be compatible with the adjacent commercial/industrial materials used at the existing June Lake PUD facilities.

- G. *All new utilities shall be installed underground in compliance with Chapter 11 of the Land Development Regulations.*

Utility connections will be underground, as required.

- H. *Exterior lighting shall be shielded and indirect and shall be minimized to that necessary for security and safety.*

The project will not have lighting unless the FAA requires a safety beacon.

The project also complies with additional standards (Section 8.040) that apply to new development outside communities and visible from US 395, i.e.:

- A. *The natural topography of the site shall be maintained. Earthwork and vegetative removal shall be minimized. Existing access roads shall be used. All site disturbance should be revegetated...preferably with local native plants.*

The project complies with all of the above.

- B. *New structures shall be situated where they are least visible from the state scenic highway. Structures shall be clustered when possible.*

The lease area is located next to an existing shed and fencing at the June Lake PUD facilities.

- C. *Roofs visible from US 395 shall be a dull dark finish.*

Project conditions will require compliance with the above.

- D. *Vertical surfaces shall blend in with the surrounding environmental. Dark or neutral colors found in the surrounding area are strongly encouraged.*

Project conditions will require compliance with the above.

- E. *Light sources shall be shielded, indirect, and not visible from US 395.*

The project will not have lighting unless the FAA requires a safety beacon.

- F. *Fencing and screening shall not contrast with the natural surroundings.*

In this case, the project will be screened by an existing metal shed and located immediately adjacent to existing chain link fencing and industrial looking development. Visual resources in the immediate area of the project already appear disturbed; the project will appear as an extension of the existing development.

- G. *Signs shall be compatible with the natural surroundings. They shall be small in scale.*

One small sign will be located on the fence for informational/emergency contact purposes.

Compliance with Mono County Design Guidelines

Mono County's Design Guidelines contain specific guidelines for the development of telecommunications facilities. The Design Guidelines are "intended to assist property owners and project designers in understanding the County's goals for attaining high quality development that is sensitive to the unique character of the county and its communities." The guidelines are intended to suggest optimal outcomes, not to suggest specific solutions to achieve those outcomes. The Mono County General Plan specifies that the guidelines will be used during the permit process as additional criteria for project review.

For telecommunications facilities, the design guidelines encourage the siting, design, and construction of telecommunications facilities in a manner that minimizes potential adverse visual impacts. Specifically, the guidelines suggest the following design elements for telecommunications towers:

1. *Applicants should submit photo simulations of the proposed facility as it would be seen from various vantage points.*

The applicant has submitted photo simulations which are included in Appendix 5.

2. *Towers near designated scenic highway corridors may be permitted by use permit only if concealed so as to be substantially invisible. Vistas from the highway should not be impaired by or diminished by the location of the tower.*

US 395 in the vicinity of the project is a state designated scenic highway; Hwy 158 is a county designated scenic highway. The proposed tower has been placed at the June Lake PUD wastewater treatment facility, immediately adjacent to an existing metal building and chainlink fencing. There are existing power poles in the area, including a large transmission line between the project site and US 395. Due to topography, the monopole will not be visible from Hwy 158 and will be shielded from view from various vantage points along US 395. The monopole, fencing, and equipment shed will be painted a dark matte color in order to blend into the surroundings and minimize potential impacts to scenic vistas.

3. *Applicants are encouraged to use topography to allow for lower tower heights, but to avoid creating silhouettes against the skyline.*

Due to topography, the monopole will not be visible from Hwy 158 and will be shielded from view from various vantage points along US 395.

4. *Telecommunications facilities should simulate objects that typically occur in landscapes similar to the proposed location (except billboards, electrical transmission, or telecommunications towers). Examples include hay barns, agricultural water towers, and trees.*

A monopole was chosen for this site, rather than a monopine, because there are no trees on-site and few trees in the background when the site is viewed from most directions. The contrast of the tree against the surrounding background would be greater than that of the pole with arrays against the surrounding background. In addition, there are existing power poles in the area, including a large transmission line located between the lease area and US 395, which create an existing impression of commercial/industrial development in the foreground. The monopole, which will be painted a matte color that blends in with the surrounding environment, will blend in with the existing utility poles as well as with the existing commercial/industrial development at the June Lake PUD facilities. Although the monopole will be visible from most vantage points in the surrounding area, the design of the project will reduce visual impacts to scenic vistas to a less than significant level.

5. *No new tower should be constructed without a setback from the tower's base of at least 1.5 times the tower height to a public or private road and at least 2.5 times the tower height to the nearest property line.*

The proposed lease site of 2,500 square feet is located on a large parcel of approximately 82.52 acres, well within the property boundaries and removed from roads.

6. *No equipment shed for a telecommunications facility should exceed 750 square feet in area nor 12 feet in height. All such sheds should be painted dark colors to blend with the surroundings and screened with vegetation or other aesthetically pleasing materials. Furthermore, all such sheds should be secured with approved fencing and a locked gate.*

The proposed equipment shed will be 192 square feet and under 12 feet in height. All equipment, including the shed, will be located within a 6 foot tall chain link fence with barbed wire and a locked gate. The shed, fencing, and monopole will be painted a dark matte color to blend into the surroundings. The shed will be screened from most directions, including from US 395, by an existing metal shed at the June Lake PUD facilities.

The project complies with a number of established design standards and scenic requirements from the Mono County General Plan and the County's Design Guidelines. In addition, the project has been designed to ensure that the facility blends into the surrounding environment and backdrop of sagebrush scrub to the greatest extent possible (see Figure 5, Photo Simulations). The monopole, equipment shelter, and fence will be painted colors that blend in with the surrounding area, likely a dark brown or dark grey/green. Disturbed areas will be revegetated in compliance with Mono County landscaping and revegetation requirements. The project has been sited next to an existing structure in order to partially shield the equipment shelter from view. In addition, fencing for the project will appear as an extension of existing fencing on-site. An existing access road, which is currently visible from several vantage points, will be utilized in order to avoid or minimize impacts to visual

resources, as well as impacts to vegetation in the area. The design of the project will result in less than significant impacts to scenic vistas in the area.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The parcel on which the project site is located is, at its closest point, within 900 feet of a portion of US 395 which is a state-designated scenic highway corridor. The parcel is an open parcel with low-growing sagebrush scrub, no trees, and existing industrial development (access roads, utility poles including large transmission poles, fencing, several metal sheds, and wastewater treatment ponds). There are no scenic resources on-site. The proposed telecommunications lease area will be immediately adjacent to one of the metal sheds and existing fencing and will appear as an extension of those existing uses.

- c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The project site is located west of US 395 in the southwest portion of the Mono Basin, on a relatively flat parcel at the base of the steeply sloping eastern flank of the Sierra Nevada mountains. The project vicinity is open and undeveloped, covered with low-growing Big Sagebrush Scrub. The sagebrush scrub extends to the base of the Sierra slopes. There are no trees on the project site, or in much of the surrounding area (see Figure 4, Existing Site Photos). The project parcel is developed with several metal buildings, fencing, roads, wastewater treatment ponds, and utility poles, including large transmission lines located between US 395 and the project site.

Vegetation to the north, west and south of the lease area is similar to that on-site, low-growing sagebrush scrub (see Figure 4, Existing Site Photos). There are no trees until higher elevations along the flank of the Sierra Nevada to the west, where there are large stands of aspen and pine trees. Due to the gain in elevation between the project area and the flank of the Sierra Nevada to the west, the trees located there will not appear directly behind the monopole in the background of scenic vistas when looking towards the site. The background when looking towards the site from most directions is of sagebrush scrub vegetation.

The overall impression, looking towards the site from most vantage points, is of an open site with low-growing vegetation that is uniform in cover, size, and color. The utility poles are visible in the foreground from most vantage points, as a manmade element in an otherwise natural-appearing landscape. Other components of development (roads, buildings, fencing) at the site are also visible to some extent, depending on the viewer's distance from the site,

The project will require the removal and/or disturbance of approximately 3,700 square feet of low-growing Big Sagebrush Scrub (Lease area=2,500 square feet, utility trench 6' x 200'=1,200 square feet =3,700 square feet). Of that total area, the 1,200 square feet for the utility trench will be revegetated; and the areas within the 2,500 lease area not covered by buildings or concrete stoops will be covered with weed barrier fabric and 3 inches of gravel.

In compliance with General Plan policies and the County's Land Development Regulations, the project has been designed to ensure that the facility blends into the overall existing visual character of the area. Paint colors for structures, equipment, and fencing will be dark, matte colors. There will be no outdoor lighting unless the FAA requires a safety beacon on the monopole. Utilities will be installed underground from an existing pole on-site. No signs will be permitted other than required FCC signage at the facility, which will be small painted metal signs attached to the fencing. Grading and site disturbance will be minimized. Disturbed areas will be revegetated. The project has been designed to reduce potential visual impacts to the site and its surroundings to less than significant levels.

- d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

No Impact. The project site is in an open area, adjacent to the June Lake PUD, which have existing minimal outdoor lighting. The equipment shelter, fence, and monopole will be painted dark, matte colors in order to blend into the surrounding environment and avoid glare. The project will have no lighting unless the FAA requires a safety beacon at the top of the monopole for planes using Lee Vining Airport.

Aesthetics Mitigation Measures

No mitigation measures are proposed:

II. AGRICULTURE 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 Dept. 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?

No Impact. There are no agricultural lands, or any lands with an agricultural designation, within the project vicinity.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. There are no agricultural lands, or any lands with an agricultural designation, within the project vicinity.

c) Conflict with existing zoning for agricultural use, 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))?

No Impact. There are no agricultural lands, or any lands with an agricultural designation, within the vicinity. There are also no forest lands, timberlands, or timberland production zones, as defined in the code sections stated above, within the project vicinity.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. There are no forest lands, as defined in the code sections in Item c, within the vicinity of the proposed project.

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?

No Impact. There are no agricultural lands, or any lands with an agricultural designation, within the vicinity. There are also no forest lands, timberlands, or timberland production zones, as defined in the code sections stated above, within the project vicinity.

Agriculture Resources Mitigation Measures

No mitigation measures are proposed.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. During normal operations, the project will not generate emissions and therefore would not conflict with the air quality plan. Vehicular travel to the site will be minimal (approximately two maintenance visits to the site per month). Use of the emergency generator will result in minimal emissions, which are in compliance with EPA and California Air Resources Board regulations (Generac, Statement of Exhaust Emissions). In addition, the use of the generator will be minimal; approximately 15 minutes per month for testing, otherwise, only in emergency situations after the batteries run out.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Mono County is a state designated non-attainment area for ozone and PM₁₀

(www.arb.ca.gov). The proposed wireless facility will not produce smoke or odors. Traffic will be minimal.

The project will require the removal and/or disturbance of approximately 3,700 square feet of low-growing Big Sagebrush Scrub (lease area=2,500 square feet, utility trench 6' x 200'=1,200 square feet =3,700 square feet total). Of that total area, the 1,200 square feet for the utility trench will be revegetated; the areas within the 2,500 lease area not covered by buildings or concrete stoops will be covered with weed barrier fabric and 3 inches of gravel, minimizing the potential for erosion following the construction phase of the project. Potential erosion during construction will be addressed by erosion control requirements of the Mono County Grading Ordinance and the General Plan and by compliance with standard project conditions, e.g.:

- Throughout grading and construction activities, exposed soil shall be kept moist through a minimum of twice daily watering to reduce fugitive dust.
- Street sweeping shall be conducted when visible soil accumulations occur along site access roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving dirt or bringing construction materials.
- Site access driveways and adjacent streets will be washed if there are visible signs of any dirt track-out at the conclusion of any workday.
- During high wind conditions (i.e. wind speeds exceeding 25 mph), areas with disturbed soil will be watered hourly and activities on unpaved surfaces shall be terminated until wind speeds no longer exceed 25 mph.
- Storage piles that are to be left in place for more than 3 working days shall be: sprayed with a non toxic soil-binder; or covered with plastic; or revegetated until returned to use.
- Tires of vehicles will be washed before leaving the site and entering a paved road.
- Dirt on paved surfaces shall be removed daily to minimize generation of fugitive dust.
- Fiber sediment barriers shall be placed downgrade of all construction activities.

Application of these uniformly applied development standards will reduce potential impacts to less than significant levels; no mitigation will be required.

- c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. Mono County is a state designated non-attainment area for ozone and PM₁₀ (California Air Resources Board, (www.arb.ca.gov). The proposed wireless facility is not anticipated to contribute to those pollutant levels. The project will not have wood burning appliances. Traffic will be minimal. Disturbed areas will be revegetated or covered with gravel. See discussion under item b above.

- d) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. The proposed wireless facility is not expected to create substantial pollutant concentrations.

- e) Create objectionable odors affecting a substantial number of people?

No Impact. The proposed wireless facility will not emit odors.

Air Quality Mitigation Measures

No mitigation measures are proposed.

IV. BIOLOGICAL RESOURCES. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The **Assessment of Biological Resources** prepared for the project included a CNDDDB records and literature search and an on-site survey. Survey work was conducted in May and June, 2013.. The search area included 200 foot wide buffers in all directions.

PLANTS

The records and literature search indicated that eight rare plant species and one sensitive plant community (Mono Pumice Flats) occur within 20 miles of the project, in native or disturbed scrub habitats that "bear some resemblance to habitats available within the project" (Paulus, p. 6). An additional species, the rock cress *Arabis cobrensis*, was included on the list of potential rare species, although it does not appear in CNDDDB records, because it occurs 5.8 miles north in similar vegetation (Paulus, p. 5). Rare plant species that could potentially occur at the proposed project include (for detailed information, see the **Assessment of Biological Resources** in Appendix A):

- Long Valley milkvetch (*Astragalus johannis-howellii*)
- Mono milkvetch (*Astragalus monoensis*)
- Masonic rock cress (*Boechea cobrensis*)
- Booth evening primrose (*Camissonia boothii* ssp. *boothii*)
- Booth hairy evening primrose (*Camissonia boothii* ssp. *intermedia*)
- Mono Lake lupine (*Lupinus duranii*)
- Torrey blazing star (*Mentzelia torreyi*)
- Foxtail theylypodium (*Thelypodium integrifolium* ssp. *complanatum*)

No rare plant populations were found in the project footprint during the field survey. Two individuals of Masonic rock cress (*Boechea cobrensis*) were found in the project's 200 foot wide construction buffer, part of a population that extends to the west and south (Paulus, p. 7). Masonic rock cress is relatively rare in California but widespread elsewhere in Nevada, Oregon, Idaho, and Wyoming. The **Assessment of Biological Resources** notes that "the entire population may be avoided by the project if equipment is restricted from working or turning more than 100 feet to the south of west from where connection to the existing power supply is proposed" (Paulus, p. 7).

WILDLIFE

The records and literature search indicated that five special status species that have some potential to occur at the site (Paulus, p. 10). Special status wildlife species that could potentially occur at the proposed project include (for detailed information, see the **Assessment of Biological Resources** in Appendix A):

- Greater sage grouse (*Centrocercus urophasianus*)
- Pygmy rabbit (*Brachylagus idahoensis*)
- Western mastiff bat (*Eumops perotis californicus*)
- White-tailed jackrabbit (*Lepus townsendii townsendii*)
- American badger (*Taxidea taxus*)

The report notes that "it is possible although unlikely (for reasons described below) that these species use the available habitats for foraging, roosting, or nesting" (Paulus, p. 10). The **Assessment of Biological Resources** prepared for the project provides detailed information concerning potential special status species on-site (see Appendix A).

During the field survey conducted in May and June, 2013, no sensitive wildlife species were observed. No nests were observed within or under the shrub canopy, or on power poles in the area. No large burrows that could be enlarged by foraging predators were found within 100 feet of the lease area. No suitable bat habitat was found onsite. Only common species were observed during the field survey; wildlife signs included rabbit pellets, badger claw marks on enlarged burrows at the southern edge of the 200 foot wide buffer area, coyote tracks, and mule deer tracks.

The **Assessment of Biological Resources** notes that the habitat on-site is marginal for sage grouse for nesting or foraging; installing raptor spikes on the monopole will reduce any potential impacts to sage grouse movement from predators (Paulus, p. 13). The area also provides marginal foraging and burrowing habitat for pygmy rabbits (Paulus, p. 13). Roosting habitat for bats is extremely limited at the project site and no evidence was found of roosting during the field surveys. Bats were observed foraging for insects above the sewer ponds; that activity would not be affected by the project (Paulus, p. 14). No evidence of jackrabbit

burrows was found on-site. Jackrabbits are highly mobile; the loss of a small amount of sagebrush scrub would not affect them. Any project component that creates additional perches for predators, or attracts them by creating trash, would diminish the overall suitability of the site for jackrabbits as well as sage grouse and pygmy rabbits (Paulus, p. 15). Signs of badger were found at the southern edge of the buffer area. Badger are highly mobile animals, adapted to a wide variety of habitats. The **Assessment** notes that the removal of a small amount of foraging habitat is not likely to affect badgers in the area.

The field survey did not find any suitable habitat on-site for a variety of other special status species, including northern goshawk, great grey owl, Sierra Nevada red fox, fisher, and species that require riparian or aquatic habitats. The report concludes that (Paulus, p. 17):

No rare plant species or sensitive vegetation communities will be affected by revegetation proposed for a small area during project implementation, and temporary loss of this habitat along the proposed buried cable alignment is not significant.

Significant effects upon special status wildlife species are unlikely, due primarily to the site's degraded habitat condition at its location adjacent to existing sewage treatment operations. There will be no substantial effect on the availability of West Portal's marginal scrub habitat to foraging greater sage grouse, pygmy rabbit, and western white-tailed jackrabbit unless usable perches for predators are created, additional predators are attracted to the site by trash, or unleashed pet dogs are allowed to roam the area. American badger have used the buffer area as recently as 2012. Highly mobile badgers would not be affected by the project, unless a burrow is newly created in the project construction footprint prior to the start of soil disturbance...The PUD pipe stack, having been in place for several years, has become habitat (possibly nesting) for rodents. They could be affected when the stack is removed prior to project construction.

The Assessment of Biological Resources suggest the following mitigation to avoid direct impacts to the CNPS List 2 species Masonic rock cress as well as to avoid identified potential effects of the project:

- Equipment should not be allowed to travel more than 100 ft to the south or west from the corridor where cable burial is proposed.
- Any surface that could serve as a high perch for raptors will be fitted with Nixalite or other effective means of perch deterrence.
- Trash will not be stored at the project site, or will be stored in a manner that is secure from all wildlife.
- Dogs brought to the site during construction or maintenance will be strictly leashed.
- The limited area of soil disturbance due to project construction will be surveyed for indication of new occupancy by American badger. In the unlikely occurrence that a badger burrow is found in the construction footprint, the best method for avoidance will be decided in consultation with CDFW.
- Any new night lighting will be shuttered.
- Construction will not include installation of any linear barriers outside the immediate footprint of the project. Construction/maintenance vehicle speed limit will be 15 mph.
- PUD pipe stack removal, being a necessary component of project implementation, will be subject to mitigations put in place during project approval. Pipe stack removal will be completed during the period September 1 to March 1, which is outside the breeding and parturition period for potentially occurring nesting rodents

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 Game or US Fish and Wildlife Service?

No Impact. There are no sensitive natural communities, including riparian habitat or wetlands, within the immediate vicinity of the project site. The Rush Creek riparian corridor is a minimum of 3,150 feet to the northwest of the project site; the Rush Creek return channel is at least 1,750 feet to the west (Paulus, p. 9).

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act

(including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The National Wetlands Inventory does not indicate the presence of wetlands on the project site or within the immediate vicinity of the project site. In addition, the **Assessment of Biological Resources** prepared for project site notes that “disturbed areas and all scrub habitats within 200 ft of the proposed project area were uniformly xerix at the time of site assessment, with no mesic microhabitats (e.g., wetland swales, ephemeral stream beds) signaled by shifts in the species assemblage or otherwise detected” (Paulus, p. 3).

- d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The project site is within the migration corridor used by the Casa Diablo deer herd. The **Assessment of Biological Resources** prepared for the project provides the following information concerning use of the site by mule deer (Paulus, p. 16):

- "The disturbed habitat within and immediately adjacent to the project site appears to only marginally provide for the requirements of mule deer that reside in the area or that pass through during migration."
- "The proposed project would occur adjacent to the existing sewage treatment facility's chain link fencing, so no significant new physical barrier to deer movement will be created."
- "Treatment facilities already cause daily human activity, constant noise, and night lighting. The proposed project will not substantially add to these factors if night lighting is shielded."

The report concludes that there will be no significant impacts to mule deer (Paulus, p. 16).

The project will have no outdoor lights unless a safety beacon is required by the FAA on the monopole. The project will not create linear barriers to movement of the deer herd. The project has been designed so that there will be no long-term impacts to wildlife, including the deer herd. However, construction activities could cause short-term impacts to mule deer, particularly during the fall and spring migration periods. In order to minimize impacts to the deer herd, proposed mitigation requires the project proponents not to use temporary construction fencing during the spring and fall deer migration periods, in order to avoid short-term linear barriers to deer herd movement.

- e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The project complies with a number of Mono County General Plan policies that address the maintenance and restoration of botanical and wildlife habitat in Mono County (Mono County Conservation/Open Space Element), e.g.:

BIOLOGICAL RESOURCES

GOAL: Maintain an abundance and variety of vegetation, aquatic and wildlife types in Mono County for recreational use, natural diversity, scenic value, and economic benefits.

Objective A

Maintain and restore botanical, aquatic and wildlife habitats in Mono County.

Policy 1: Future development projects shall avoid potential significant impacts to animal or plant habitats or mitigate impacts to a level of non-significance, unless a statement of overriding considerations is made through the EIR process.

Action 1.4: Projects outside community areas within identified deer habitat areas, including migration corridors or winter range (see the Biological Resources Section of the Master Environmental Assessment), which may have a significant effect on deer resources shall submit a site-specific deer study performed by a recognized and experienced deer biologist in accordance with Action 1.1.

Action 1.9: Limit road development in valuable habitat areas to the minimum required to achieve necessary access.

- 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?
No Impact. There are no habitat conservation plans of any type on private lands in the county.

Biological Resources Mitigation Measures

The following mitigation is proposed:

1. Equipment should not be allowed to travel more than 100 ft to the south or west from the corridor where cable burial is proposed.
2. Any surface that could serve as a high perch for raptors will be fitted with Nixalite or other effective means of perch deterrence.
3. Trash will not be stored at the project site, or will be stored in a manner that is secure from all wildlife.
4. Dogs brought to the site during construction or maintenance will be strictly leashed.
5. The limited area of soil disturbance due to project construction will be surveyed for indication of new occupancy by American badger. In the unlikely occurrence that a badger burrow is found in the construction footprint, the best method for avoidance will be decided in consultation with CDFW.
6. Any new night lighting will be shuttered.
7. Construction will not include installation of any linear barriers outside the immediate footprint of the project. Construction/maintenance vehicle speed limit will be 15 mph.
8. PUD pipe stack removal, being a necessary component of project implementation, will be subject to mitigations put in place during project approval. Pipe stack removal will be completed during the period September 1 to March 1, which is outside the breeding and parturition period for potentially occurring nesting rodents

V. CULTURAL RESOURCES. Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
No Impact. The project site is disturbed and has been used as a sewage treatment facility for many years. Further disturbance of the site during project construction will be limited to the 2,500 square foot lease area for the wireless facilities and the 1,200 easement area for the utility trench. There are no historical resources in evidence and it is not anticipated that any will be revealed during construction activities. Standard mitigation measures require the applicant and/or his contractor to stop work if cultural resources evidence is encountered during construction; earthwork and construction activities cannot resume until the site has been evaluated by a qualified cultural resources specialist and appropriate mitigation or avoidance measures put into place.
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
No Impact. The project site is disturbed and has been used as a sewage treatment facility for many years. Further disturbance of the site during project construction will be limited to the 2,500 square foot lease area for the wireless facilities and the 1,200 easement area for the utility trench. There are no archaeological resources in evidence and it is not anticipated that any will be revealed during construction activities. Standard mitigation measures require the applicant and/or his contractor to stop work if cultural resources evidence is encountered during construction; earthwork and construction activities cannot resume until the site has been evaluated by a qualified cultural resources specialist and appropriate mitigation or avoidance measures put into place.
- c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
No Impact. No known paleontological resources exist on the project site. There are also no unique geologic features on-site; the site is flat, with coarse sands and small gravel..
- d) Disturb any human remains, including those interred outside of formal cemeteries?
No Impact. No known human remains exist on the project site.

Cultural Resource Mitigation Measures

The following mitigation is proposed:

1. Project conditions shall require the applicant and/or the applicant's contractor to stop work and notify appropriate agencies and officials if cultural resource evidence is encountered during earthwork and

construction activities on the project site. No additional disturbance or construction activities shall be permitted or shall occur until a) the applicant hires a qualified cultural resources specialist; b) the specialist surveys the site and evaluates i) whether any resources encountered qualify as culturally (archaeologically or historically) significant resources and ii) whether the project will significantly affect identified cultural resources; and 3) if the specialist determines that the project as currently designed and implemented will significantly impact cultural resources, the specialist shall identify acceptable avoidance or mitigation measures to reduce impacts to cultural resources to less than significant levels, including revisions to the project design.

VI. GEOLOGY AND SOILS. Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?
No Impact. The project site is not located within a fault rupture hazard zone as shown on the Alquist-Priolo maps (California Geological Society, www.conservation.ca.gov/cgs).
 - ii) Strong seismic ground shaking?
Less Than Significant Impact. The entire county is subject to ground shaking. The county is designated seismic Zone 4, the zone of greatest hazard as defined in the Uniform Building Code. All future structures, including walls, are required to meet these standards.
 - iii) Seismic-related ground failure, including liquefaction?
No Impact. The project site is not located on fill and is not anticipated to be an area at high risk for ground failure.
 - iv) Landslides?
No Impact. The project site is relatively flat and is not adjacent to slopes or moraines, nor is it shown on landslide maps prepared by the California Geological Society (www.conservation.ca.gov/cgs).
- b) Result in substantial soil erosion or the loss of topsoil?
No Impact. The project will require the removal and/or disturbance of approximately 3,700 square feet of low-growing Big Sagebrush Scrub (lease area=2,500 square feet, utility trench 6' x 200'=1,200 square feet). Of that total area, the 1,200 square feet for the utility trench will be revegetated in compliance with Mono County requirements; the areas within the 2,500 lease area not covered by buildings or concrete stoops will be covered with weed barrier fabric and 3 inches of gravel, minimizing the potential for erosion following the construction phase of the project. Potential erosion during construction will be addressed by erosion control requirements of the Mono County Grading Ordinance and the General Plan and by compliance with standard project conditions, e.g.:
- Throughout grading and construction activities, exposed soil shall be kept moist through a minimum of twice daily watering to reduce fugitive dust.
 - Street sweeping shall be conducted when visible soil accumulations occur along site access roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving dirt or bringing construction materials.
 - Site access driveways and adjacent streets will be washed if there are visible signs of any dirt track-out at the conclusion of any workday.
 - During high wind conditions (i.e. wind speeds exceeding 25 mph), areas with disturbed soil will be watered hourly and activities on unpaved surfaces shall be terminated until wind speeds no longer exceed 25 mph.
 - Storage piles that are to be left in place for more than 3 working days shall be: Sprayed with a non toxic soil-binder, **or** covered with plastic; **or** revegetated until returned to use.
 - Tires of vehicles will be washed before leaving the site and entering a paved road.
 - Dirt on paved surfaces shall be removed daily to minimize generation of fugitive dust.
 - Fiber sediment barriers shall be placed downgrade of all construction activities.

Application of these uniformly applied development standards will reduce potential impacts to less than significant levels; no mitigation will be required.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
No Impact. The site is not located on fill dirt or other unstable soils. The lease area is relatively flat, as is most of the proposed access road; earthwork on-site would not result in a landslide.
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
No Impact. The applicant will be required to submit a soils report or process a soils report waiver. Such report or waiver shall be reviewed and approved by the Director of Public Works, according to the provisions of Mono County Code (MCC) § 17.36.090.
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
No Impact. The project will not have a septic system.

Geology and Soils Mitigation Measures

No mitigation measures are proposed.

VII. GREENHOUSE GAS EMISSIONS. Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant effect on the environment?
No Impact. The proposed project is an unmanned cell tower. After the construction phase, the project will not generate any traffic other than approximately two routine monthly maintenance visits. The project does not involve woodburning or the creation of any other direct emissions. The project will use a minimal amount of water, provided by a local water provider in the community, only during construction and while the required landscaping is being established. The project will use a minimal amount of electricity. The project will not remove any trees and only a small amount of low-growing sagebrush scrub. Some of the areas where vegetation is removed during construction will be revegetated in compliance with Mono County's requirements for landscaping and revegetation.
- b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
No Impact. There are no applicable plans, policies, or regulations for the reduction of greenhouse gas emissions in Mono County. The California State Air Resources Board has adopted regional greenhouse gas reduction standards for the areas included in the state's 18 Metropolitan Planning Organizations (MPOs); Mono County is not included in any of those MPOs (www.CoolCalifornia.org). California's Climate Change Scoping Plan encourages local governments to reduce greenhouse gas (GHG) at least 15 percent below current levels by 2020 (www.CoolCalifornia.org). The proposed project will not conflict with that goal. Many of the methods suggested to reduce greenhouse gas emissions involve reducing traffic, increasing use of mass transit, concentrating development in communities, utilizing alternative energy sources, and reducing the consumption of electricity and water. Many of those methods do not apply to the proposed project.

VIII. 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?
No Impact. The project will not involve 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?
Less Than Significant Impact. Diesel fuel will be stored on-site for use in an emergency generator. The Mono

County Environmental Health Department will require compliance with uniformly applied Environmental Health regulations, including the completion of a Hazardous Materials Business Plan, and ongoing compliance with that plan. Application of these uniformly applied health standards will reduce potential impacts to a less than significant level.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
No Impact. There are no schools within one-quarter mile of the project site.
- 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?
No Impact. The project site is not on any list of hazardous materials sites.
- 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?
No Impact. The project site is not located within the boundaries of an airport land use plan and is more than 2 miles from Lee Vining Airport.
- f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
No Impact. There are no private airstrips in the general area of the project site.
- g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
No Impact. The proposed project is consistent with Mono County's Emergency Operations Plan (EOP). The proposed project will provide adequate access for emergency vehicles.
- h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
No Impact. The project is an unmanned wireless facility, in a remote area away from community areas. The project will not expose people or structures to a significant risk from wildland fires.

Hazards and Hazardous Mitigation Measures

No mitigation measures are proposed.

IX. HYDROLOGY AND WATER QUALITY. Would the project:

- a) Violate any water quality standards or waste discharge requirements?
No Impact. The proposed wireless facility will be unmanned and will not have any facilities or equipment that utilizes water. Project conditions will require irrigation water for erosion control during construction and to establish required revegetation of disturbed areas. That water will be provided by a local water provider, and will be required only during the construction phase and until revegetated areas are established. The lease site is relatively flat and runoff generated on-site will not be channelized toward downstream resources.

The project includes approximately 302 square feet of impermeable surfaces (equipment shelter and concrete stoop, concrete pads for generator and fuel tank). Remaining disturbed areas will be revegetated or covered with gravel, which will allow groundwater recharge and allow runoff generated on-site to remain on-site.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
No Impact. The proposed wireless facility will be unmanned and will not have any facilities that utilize water. Project conditions will require irrigation water for erosion control during construction and to establish

required revegetation of disturbed areas. That water will be provided by a local water provider, and will be required only during the construction phase and until revegetated areas are established. Irrigation water will infiltrate back into the soil to recharge groundwater in the area.

The project includes approximately 302 square feet of impermeable surfaces (equipment shelter and concrete stoop, concrete pads for generator and fuel tank). Remaining disturbed areas will be revegetated or covered with gravel, which will allow groundwater recharge and allow runoff generated on-site to remain on-site.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?
No Impact. There are no streams or rivers on-site. The project site is located in a relatively flat area that will not contribute to off-site runoff. The project involves the installation of approximately 302 square feet of impermeable surfaces (equipment shelter, concrete slabs). Remaining disturbed areas will be covered with gravel and landscaping, which will provide an adequate area for stormwater infiltration so that off-site erosion and siltation do not occur. Standard erosion control BMPs will be implemented during the construction phase to ensure that erosion or siltation does not occur.
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?
No Impact. There are no streams or rivers on-site or in the immediate vicinity of the project. The project site is located in a relatively flat area that will not contribute to off-site runoff. The project involves the installation of approximately 302 square feet of impermeable surfaces (equipment shelter, concrete slabs). Remaining disturbed areas will be covered with gravel and landscaping, which will provide an adequate area for stormwater infiltration so that runoff is not increased.
- e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
No Impact. There are no stormwater drainage systems in the area. The project site is located in a relatively flat area that will not contribute to off-site runoff. The project involves the installation of approximately 302 square feet of impermeable surfaces (equipment shelter, concrete slabs). The access road will be gravel to allow for stormwater infiltration. Following construction, vehicles will only visit the site approximately twice per month on maintenance visits, minimizing the amount of pollutants from automobiles that could be deposited on-site.
- f) Otherwise substantially degrade water quality?
No Impact. The project does not involve water or sewer services. Runoff will be contained on-site. No other impacts to water quality are anticipated.
- g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
No Impact. The project does not involve housing.
- h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?
No Impact. The project site is not within the 100-year flood zone and dam inundation zone as indicated on the FEMA Flood Zone Maps available online.
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
No Impact. The project does not involve housing.
- j) Inundation by seiche, tsunami, or mudflow?
No Impact. The project site is not in an area subject to seiche, tsunami, or mudflows.

Hydrology and Water Quality Mitigation Measures

No hydrology and water quality mitigation measures are proposed.

X. LAND USE AND PLANNING. Would the project:

- a) Physically divide an established community?

No Impact. The project will not divide an established community. It is outside of community areas, on land that is not designated for community development. Surrounding parcels, on all sides, are also not designated for community development.

- b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The proposed project is located on a parcel designated Public and Quasi-Public Facilities/PUD (PF/PUD). The intent of the Public and Quasi-Public Facilities designation is to "provide for a variety of public and quasi-public facilities and uses" (Mono County Land Use Regulations). The PF land use designation permits public utility buildings, structures and uses subject to Use Permit. Public buildings and quasi-public buildings and uses are defined in the Land Development Regulations to include communications facilities:

02.950 Public utility buildings, structures and uses.

"Public utility buildings, structures and uses" means the use of land for public utility purposes by public, quasi-public and private energy and communication purposes and distributors except for conventional electrical distribution substations and facilities. Hydroelectric and geothermal power plant construction is considered to fall within this definition.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. There are no habitat conservation plan or natural community conservation plans on private lands in Mono County.

Land Use and Planning Mitigation Measures

No mitigation measures are proposed.

XI. 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?

No Impact. There are no known mineral resources in the project vicinity (Mono County MEA, Figure 17). The development of wireless telecommunications facilities on-site could temporarily result in the loss of the availability of any mineral resources. In the long-term, it would not affect the availability of mineral resources.

- 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?

No Impact. No mining or mineral resources have been identified in local plans on-site (Mono County MEA, Figure 17).

Mineral Resource Mitigation Measures

No mitigation measures are proposed.

XII. NOISE. Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The wireless facility will not create any noise during normal operations. Construction-related noise impacts could cause some temporary disturbance. Proposed mitigation measures for the project prohibit construction during the spring and fall migration periods in order to minimize potential impacts, including noise impacts, to the Casa Diablo deer herd. Construction activities must also comply with

the requirements of the County's Noise Ordinance (Mono County Code, Chapter 10.16). Application of those uniformly applied development standards will reduce potential impacts to less than significant levels; no mitigation for potential construction-related noise impacts will be required.

The project includes one UL2200 certified 30 kw standby diesel generator on a 6' x 13' concrete pad that would be utilized by Verizon. The generator would only be used during sustained power outages when on-site backup batteries are exhausted. Generators produced by the same company, but certified for 60 kw of standby power, will produce at full load an average of 67.1 dBA at a distance of 23 feet (Generac Power Systems). The proposed generator is assumed to produce similar noise levels.

The Mono County Noise Ordinance contains maximum allowable noise levels for the operation of mobile equipment [Mono County Code 10.16.090 (6)], i.e.:

- a. At residential properties:
Maximum noise levels for nonscheduled, intermittent, short-term operation (less than ten days) of mobile equipment as set out in Table 10.16.090A of this section.
- b. At business properties:
Maximum noise levels for nonscheduled, intermittent, short-term operation of mobile equipment. Daily, including Sundays and legal holidays, all hours; maximum of 85 dBA.

Table 10.16.090A

	Type I Areas Single-Family Residential	Type II Areas Multi-Family Residential	Type III Areas Semi- Residential Commercial
Daily, except Sundays & legal holidays 7 a.m. to 7 p.m.	75 dBA	80 dBA	85 dBA
Daily, 7 p.m. to 7 a.m. & all day Sundays & legal holidays	60 dBA	65 dBA	70 dBA

Use of a generator for emergency purposes would qualify as a nonscheduled, intermittent, short-term use of equipment. The sound level would be under the maximum 70 dBA noted in subsection b above for commercial uses, during the quietest times at night, on Sundays and holidays. Potential noise impacts from the use of an emergency generator will be less than significant.

- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
No Impact. The wireless facility will not create groundborne vibration or groundborne noise levels.
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
No Impact. The wireless facility will not create any permanent increase in the ambient noise levels in the project vicinity.
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
Less Than Significant Impact. Operations at the June Lake PUD wastewater treatment facility adjacent to the project site are continuous, creating constant noise, raising the ambient noise levels above those in the surrounding undeveloped area. While short-term increases in noise levels would result from construction activities, they would not be substantially above existing commercial/industrial noise levels. In addition, compliance with all requirements of the Mono County Noise Regulations (Mono County Code §10.16) would reduce those impacts to less than significant levels. Short-term increases in noise levels could also result from the use of a generator during power outages. See discussion under item a above.
- 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 expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not within an airport land use plan area or within two miles of the Lee Vining Airport.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not within the vicinity of a private airstrip.

Noise Mitigation Measures

No mitigation measures are proposed.

XIII. POPULATION AND HOUSING. Would the project:

- a) Induce substantial 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)?

No Impact. The project is an unmanned wireless communications facility. It is not anticipated to induce population growth.

- b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is designated Public Facility/Public Utility District (PF/PUD) and does not include any existing housing.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is designated Open Space (OS) and does not include any existing housing; the project would not displace any residents.

Population and Housing Mitigation Measures

No mitigation measures are proposed.

XIV. 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 these public services:

- i) Fire protection?

Less Than Significant Impact. The project will be an unmanned wireless facility, with minimal structures, in an area removed from other development. A 132 gallon diesel fuel tank will be installed on-site to provide fuel for an on-site emergency generator. The fuel tank will be installed in compliance with Mono County Department of Environmental Health requirements for fuel tanks. The Department of Environmental Health will also require a Hazard Business Plan for the tank. The installation and use of the tank will comply with existing standards and regulations for the safe operation of fuel tanks, reducing the fire risk to a less than significant impact. The project will not create a need for additional fire protection services.

- ii) Police protection?

No Impact. The project is a wireless facility. It is not anticipated to generate additional population or to create any impacts to police protection.

- iii) Schools?

No Impact. The project is a wireless facility. It is not anticipated to generate additional population or to create any impacts on the schools.

iv) Parks?

No Impact. The project is a wireless facility. It will not impact parks or recreational facilities.

v) Other public facilities?

No Impact. No other public service needs are anticipated.

Public Services Mitigation Measures

No mitigation measures are proposed.

XV. RECREATION.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The project is a wireless facility. It will not impact existing recreational facilities.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. The project is a wireless facility. It does not include recreational facilities and will not require the construction or expansion of recreational facilities.

Recreation Mitigation Measures

No mitigation measures are proposed.

XVI. TRANSPORTATION/TRAFFIC. Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

No Impact. Once construction of the facility is completed, the only traffic to the wireless facility will be routine monthly maintenance visits. Access routes to the site, including US 395 in the vicinity of the project site, have sufficient capacity to handle construction traffic.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. See response to Item XVa above. Traffic congestion is generally not a problem in this area.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The project will not impact air traffic patterns.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. Access to the site will be from US 395, via an existing access point. The project will not alter that access point. The planned on-site access is a twenty-foot wide gravel access road, which will be predominantly straight and flat.

e) Result in inadequate emergency access?

No Impact. The project will be accessed from US 395 and an on-site twenty-foot wide gravel access road. US 395 is a paved four-lane highway with separated grades in the project vicinity; it is plowed in the winter. The on-site access road is predominantly straight and flat and is also plowed in winter since it provides access to the June Lake PUD facilities. Adequate access will exist for emergency vehicles throughout the year.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise

decrease the performance or safety of such facilities?

No Impact. The project is an unmanned cell tower and as such will not conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or affect such facilities in any way.

Transportation/Traffic Mitigation Measures

No mitigation measures are proposed.

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The project is an unmanned wireless facility. It will not require wastewater treatment.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. The project is an unmanned wireless facility. It will not include any water or wastewater facilities.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. There are no storm water drainage facilities in the project area. The project has been designed 1) to minimize impervious surfaces and therefore minimize runoff, and 2) to contain any concentration of runoff on-site so that it will not cause erosion or other environmental effects. The on-site access road is gravel, which allows for infiltration of rainfall. The site is relatively flat; runoff should be minimal and should infiltrate surrounding soils.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact. The proposed wireless facility will be unmanned and will not have any facilities that utilize water. Project conditions will require irrigation water for erosion control during construction and to establish required revegetation of disturbed areas. That water will be provided by a local water provider, and will be required only during the construction phase and until revegetated areas are established.

- e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the provider's existing commitments?

No Impact. The proposed development will not require the construction of new service facilities for sewer service.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

No Impact. Mono County landfill facilities are not expected to be impacted by the proposed project. Benton Crossing Landfill and Pumice Valley Landfill have sufficient capacity to serve local communities for over ten years (Mono County Public Works Department and SRK Consulting Engineers and Scientists, **Reports of Disposal Site Information, Benton Crossing Landfill and Pumice Valley Landfill**). In addition, green waste from landclearing activities is turned into mulch at the landfill sites instead of being placed in the landfill.

- g) Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The project will comply with all solid waste regulations.

Utilities and Service Systems Mitigation Measures

No mitigation is required.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples

of the major periods of California history or prehistory?

No significant environmental effects are anticipated to result from the proposed Use Permit Application. The facility will be an unmanned telecommunications facility that does not emit noise, smoke or odors. Following the construction phase, the only traffic to the site will be two monthly routine maintenance trips.

The project has been designed to reduce potential impacts to less than significant levels. Development on-site will be partially screened by topography; disturbed areas will be revegetated with a local native seed mix. The proposed monopole is intended to blend in with surrounding vegetation types. Paint colors for structures, fencing and equipment will be dark, matte colors to blend the facilities into the surrounding environment. Signs will be limited to small metal signs attached to the fencing there will be no outdoor lighting unless the FAA requires a safety beacon. Air quality impacts from dust will be controlled during construction and afterward in compliance with Mono County erosion control standards.

Potential impacts to vegetation and wildlife species will either be avoided or mitigated to less than significant levels.

- 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)?

The project has been designed to reduce impacts to less than significant levels. There are no other projects in the vicinity.

- c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

The project will not cause substantial adverse effects on human beings.

VI. REFERENCES

California Air Resources Board

Air emissions inventory data. Information on air quality and transportation planning, available online at www.arb.ca.gov

California Department of Fish and Game

Special status species, habitat information, California Natural Diversity Database (CNDDDB), California Wildlife Habitat Relationships System (CWHR), available online at www.dfg.ca.gov

California Department of Transportation

Planning guidance, traffic counts, scenic highway designations, available online at www.dot.ca.gov

CalFlora

Information on wild plants in California, available online at www.calflora.org

California Geological Survey

Alquist-Priolo Fault Hazard Maps, information on mineral resources and geologic hazards, available online at www.conservation.ca.gov/cgs

California Native Plant Society

Inventory of Rare and Endangered Plants (online edition, v7-Feb, 2011), available online at www.cnps.org

California Regional Water Quality Control Board

Water Quality Control Plan for the Lahontan Region (Basin Plan). 1995.

Cool California

Information on reducing greenhouse gas emissions (GHG), available online at www.CoolCalifornia.org

Federal Emergency Management Agency

FIRM flood rate maps, available online at www.hazards.fema.gov

Generac Power Systems, Inc.

Sound Test Results, 3.0 John Deere 60kW. 06/07.

Statement of Exhaust Emissions, Gaseous Fueled Generator with Catalyst and Air Fuel Ration Control. 9/2/04

Mono County Code.

Chapter 10.16, Noise Ordinance.

Chapter 13.08, Land Clearing, Earthwork, and Drainage.

Mono County Land Development Regulations (Revised Land Use Element).

Mono County Office of Emergency Services

Mono County Emergency Operations Plan (EOP). 2004.

Mono County Local Transportation Commission

Regional Transportation Plan (RTP). 2005.

Mono County Planning Department.

Mono County Design Guidelines

Mono County General Plan and Updates. 2001, 2010.

Mono County Master Environmental Assessment and Updates (MEA). 2001, 2010.

Multi-Jurisdictional Local Hazard Mitigation Plan for Mono County and Mammoth Lakes. 2006.

Mono County Public Works Department and SRK Consulting Engineers and Scientists

Report of Disposal Site Information. Joint Technical Document. Benton Crossing Landfill. 2004.

Report of Disposal Site Information. Joint Technical Document. Pumice Valley Landfill. 2004.

Paulus, Jim.

West Portal Wireless Telecommunications Facility Assessment of Biological Resources. June 28, 2013.

US Department of Agriculture, Natural Resource Conservation Service
Soil surveys, available online at websoilsurvey.nrcs.usda.gov

Species	Federal	State	CNPS	elevation range (m)	habitat range	nearest occurrence	likelihood of occurrence at project
Wildlife							
Not Federal or State Listed (cont.)							
Mammals (cont.)							
<i>Lepus townsendii townsendii</i>		SC		1950-3280	sagebrush scrub, open coniferous forest, Sierra Nevada, western U.S.	likely sagebrush scrub near Wilson Butte (in 1916), 6900 ft (2090 m), 2.5 miles north	documented local occurrence is old (1916), but some likelihood due to similar habitat and elevation
<i>Sorex lyellii</i>		SC		2000-3260	moist, grassy meadows with riparian willows, central Sierra Nevada	likely riparian meadow or scrub near lower Walker Creek (in 1915), 6850 ft (2080 m), 2.4 miles north	very unlikely due to lack of suitable habitat

Rank or status, by agency:

Federal = USFWS under the Endangered Species Act (CDFG, 2013xxanimals).

Candidate = designated Candidate for Listing

Endang = Endangered

State = California Department of Fish and Game listings under the California Endangered Species Act (CDFG, 2013xx2refs).

SC = Species of Concern

Thr = Threatened

Endang = Endangered

CNPS = California Native Plant Society listings (CNPS, 2001, 2013)

1B = rare and endangered in California and elsewhere

2 = rare, threatened or endangered in California, but more common elsewhere

4 = watchlist species of limited distribution