

DRAFT INITIAL STUDY and ENVIRONMENTAL CHECKLIST

FOR

AN ORDINANCE CHANGING PROVISIONS OF TITLE 20, DIVISION 1 OF THE MENDOCINO COUNTY
CODE (WIRELESS COMMUNICATIONS TOWER INSTALLATION)

March 2015

**Lead Agency:
Mendocino County**

Lead Agency Contact:
Dusty Duley
Mendocino County
Planning and Building Services
860 North Bush Street
Ukiah, California 95482
(707) 234-6650

Prepared by:
LACO Associates
21 W. 4th Street
Eureka, California 95501
(707) 443-5054

**Ordinance Amendment
OA 2014-0003**

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I. PROJECT SUMMARY

Date: March 2015

Project Title: Mendocino County Wireless Ordinance

Lead Agency: Mendocino County

Contact: Dusty Duley
County of Mendocino Planning and Building Services Department
860 North Bush Street
Ukiah, California 95482
707-234-6650

Location: Inland, Unincorporated Areas of Mendocino County

Coastal Zone: The proposed ordinance will not affect the Coastal zone.

Affected Parcel(s):

The proposed ordinance will apply to all General Plan Land Use Designations within the inland unincorporated areas of Mendocino County.

The proposed ordinance will apply to all zoning districts within the inland unincorporated areas of Mendocino County.

Anticipated Permits and Approvals: The proposed ordinance will be scheduled for a public hearing before the Mendocino County Planning Commission. The Planning Commission will make recommendations to the Mendocino County Board of Supervisors. The Board of Supervisors must hear and adopt the ordinance for it to become effective.

California Environmental Quality Act (CEQA) Requirement: The proposed project is subject to the requirements of the California Environmental Quality Act (CEQA). The Lead Agency is Mendocino County. The purpose of this Initial Study (IS) is to provide a basis for determining whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration. This IS is intended to satisfy the requirements of the CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387).

CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts (CEQA Section 20180(c) (2) and State CEQA Guidelines Section 15070(b) (2)).

Section 15063(d) of the State CEQA Guidelines states that an IS shall contain the following information in brief form:

- 1) A description of the project including the project location
- 2) Identification of the environmental setting
- 3) Identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to provide evidence to support the entries
- 4) Discussion of means to mitigate significant effects identified, if any
- 5) Examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls
- 6) The name of the person or persons who prepared and/or participated in the Initial Study

II. PROJECT DESCRIPTION: Mendocino County (County) is considering adopting an ordinance to define where and how wireless communications facilities may be installed in the inland unincorporated areas of Mendocino County. The proposed ordinance describes the circumstances in which wireless facilities may be exempt from discretionary review, subject to Administrative Permits, and when a Major Use Permit will be required.

Wireless communications facilities, commonly called “cell towers”, are becoming increasingly common and the County is receiving applications for new towers each year. As cellular and broadband companies begin to implement wireless networks for the next generation of wireless service, the number of applications is expected to increase. Wireless communications facilities are an important component in the general communications needs of County residents and a vital link in the local emergency response network.

Structures associated with wireless communications facilities, including antennas, antenna towers, lighting, equipment shelters, generators fences, and access roads have the potential to interfere with views, natural vegetation and habitat value, quiet seclusion and scenic values. The cumulative effect of numerous facilities being developed by competing communication services providers can create unnecessary visual impacts through the development of functionally redundant facilities that could detract from the visual quality and aesthetic character of both the undeveloped natural areas and Mendocino County’s small towns. This ordinance is intended to limit the visual and aesthetic impacts of wireless facilities while protecting the public’s health, safety, and welfare.

Currently, Section 20.236.005 of the Mendocino County Zoning Code (Zoning Code) specifies that all wireless facilities require a Major Use Permit and are subject to Planning Commission review. However, the Zoning Code does not specify any performance standards relating to wireless facilities. In 2001, the Mendocino County Planning Commission adopted advisory “Guidelines for the Development of Wireless Communications Facilities” (Guidelines). These Guidelines have been used to evaluate wireless facilities permitted through a Major Use Permit.

The proposed ordinance will provide a consistent and comprehensive regulatory scheme for the development and operation of wireless communications facilities consistent with applicable federal regulations. The ordinance is intended to protect the aesthetic quality of the county and minimize the adverse impacts of wireless communications facilities while providing for the communications needs of residents, businesses, visitors, and government.

The proposed ordinance provides exemptions from discretionary review for the following types of wireless facilities:

- Private communications equipment used for personal use such as private radio, television, internet, or ham radio reception antennas.
- Small scale, low powered, short-range and visually inconspicuous wireless internet transmitter/receiver, like those used for wi-fi hotspots.
- Government owned facilities used primarily to protect public health, safety and welfare, facilities operated and used exclusively by providers of emergency medical services (such as hospitals, ambulance and medical air transport services)
- Facilities operated and used exclusively by educational facilities for educational services.
- Facilities specifically exempted under federal or state law as determined by the Director of Planning and Building (Director).
- Temporary facilities erected and operated for use in emergency situations, and approved in advance by the Director in writing, for operations not exceeding two weeks are also exempt, though the operation of temporary facilities may be extended beyond the two week limit at the discretion of the Director.

- Minor modifications to existing facilities, such as replacing existing equipment with similar, smaller, or less visible equipment that will result in little or no change to the visual appearance of the existing facility.

These types of wireless communications facilities will continue to be regulated by height limitations specified in each zoning district and subject to the height exceptions standards specified in existing Zoning Code (Section 20.152.025(A)).

Developers are encouraged, even with exempt facilities, to locate and design facilities to minimize the aesthetic impacts, by designing facilities to be compatible with the existing surroundings. Exempt facilities will be required to obtain all necessary building permits prior to initiating construction.

The proposed ordinance would allow facilities that meet specified development standards to be permitted through the Administrative Permit process. Administrative Permits can be discretionary actions and subject to CEQA review. Noticing requirements for Administrative Permits vary by the type of project and, are subject to the discretion of the Director of Planning and Building Services acting as the Zoning Administrator. The Zoning Administrator is the decision maker, and may require a public hearing for a project that is subject to obtaining an Administrative Permit.

Under the proposed ordinance, wireless facilities qualifying for an administrative permit include additional antennas and equipment proposed for co-location on existing towers, building and roof-mounted antennas, and new wireless communications self-support structures that meet the development standards outlined in proposed revisions to Section 20.236.025 (Appendix A). These standards require that new facilities that are co-located on existing towers be consistent with the requirements of the original permit. Other standards include, height and width restrictions on new antennas mounted on existing towers, and a requirement that the co-located antenna's combined radio frequency radiation does not exceed the Federal Communications Commission's (FCC) maximum exposure level. Facilities that are not exempt or eligible for the Administrative Permit process may be permitted through a Major Use Permit as described in the County Inland Zoning Code.

III. PROJECT SETTING AND LOCATION

The propose ordinance would be in effect throughout the inland unincorporated areas of Mendocino County.

IV. ENVIRONMENTAL EFFECTS

An environmental checklist follows this section, and addresses all potential adverse effects resulting from the proposed project. No significant adverse effects are expected from adopting the proposed ordinance.

V. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, and involve at least one impact that is a "**Potentially Significant Impact**" or "**Potentially Significant Unless Mitigation Incorporated**" as indicated by the checklists on the following pages.

	Aesthetics		Agriculture Resources		Air Quality
	Biological Resources		Cultural Resources		Geology and Soils
	Green House Gases		Hazards and Hazardous Materials		Hydrology and Water Quality
	Land Use and Planning		Mineral Resources		Noise
	Population and Housing		Public Services		Recreation
	Transportation		Utilities and Service Systems		Mandatory Findings of Significance

An explanation for all checklist responses is included, and all answers take into account the whole action involved and the following types of impacts: off-site and on-site; cumulative and project-level; indirect and direct; and construction and operational. The explanation of each issue identifies (a) the threshold of significance, if any, used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

In the checklist, the following definitions are used:

"Potentially Significant Impact" means there is substantial evidence that an effect may be significant.

"Potentially Significant Unless Mitigation Incorporated" means the incorporation of one or more mitigation measures can reduce the effect from potentially significant to a less than significant level.

"Less Than Significant Impact" means that the effect is less than significant and no mitigation is necessary to reduce the impact to a lesser level.

"No Impact" means that the effect does not apply to the proposed project, or clearly will not impact nor be impacted by the proposed project.

DETERMINATION: (To be completed by the Lead Agency on the basis of this initial evaluation)

<input checked="" type="checkbox"/>	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
<input type="checkbox"/>	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.
<input type="checkbox"/>	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
<input type="checkbox"/>	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.
<input type="checkbox"/>	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

Title

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on aesthetic resources if it will have a substantial adverse effect on a scenic vista; substantially damage scenic resources, including but not limited to; trees, rock outcroppings, and historic buildings within a state scenic highway; substantially degrade the existing visual character or quality of the site and its surroundings; or, create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

DISCUSSION: Mendocino County is known for its forested hillsides and scenic vistas. The scenery is a large draw for tourists, which play an important part in the local economy. The proposed ordinance contains a number of provisions and standards that are intended to limit the visual impact of new and modified existing wireless communication facilities and codifies the impact avoidance measures outlined in existing advisory guidelines. The proposed ordinance will not take effect within the Coastal Zone.

I.a-c) Currently all wireless communications facilities projects require consideration by the Planning Commission and are reviewed under the adopted advisory Guidelines. The Guidelines require wireless communications facilities to be "...located and designed to minimize visibility and to be visually compatible with their surroundings" (Section B(2)A). Section B(2)G in the Guidelines prevents impacts to scenic vistas by discouraging ridge top sites where towers will be silhouetted against the sky, as seen from surrounding communities or highly used public locations. Section B(2)H is more inclusive, requiring that facilities, including towers, antennas, buildings, and other structures and equipment, "visible from adjacent residences or public vantage points, shall be designed, located, constructed, painted, screened, fenced, landscaped, or otherwise architecturally treated to minimize their appearance and visually blend with the surrounding natural and built environments."

Adoption of the proposed ordinance will allow some wireless communications facilities to be exempt from discretionary review, as outlined in the project description. Exempt facilities are generally for private use, emergency services, or educational purposes. Other exempt facilities include; wi-fi hotspots and minor modifications to existing facilities that will result in little or no change to the existing visual appearance. The facilities that are proposed to be exempt from discretionary review will continue to be subject to height limitations of the applicable zoning district.

The aesthetic impacts from wireless communication facilities that are exempt from discretionary review will be limited. The majority of the potentially exempt facilities do not involve new construction or ground disturbance that could generate an aesthetic impact. There are very limited circumstances (emergency communications and educational facilities) in which entirely new facilities could be found exempt. The number of these new facilities would be limited. All wireless communications facilities that are found to be exempt from discretionary review will be required to conform to the maximum height specified in the zoning district in which they are located. With the height limitation, exempt facilities have no more

potential to impact esthetics than other principally permitted, ministerial projects that may be located in that zone.

Projects that are not found to be exempt will be subject to an Administrative Permit or a Major Use Permit. For these projects, the proposed ordinance, in Section 20.236.025 contains a number of elements that will limit the visual impact of new wireless communications facilities. The proposed ordinance requires that towers must have a “backdrop of terrain” that obscures the visibility of the facility, and discourages the placement of towers on ridgetops where they would be silhouetted against the sky or visible from highly public locations. This requirement would avoid adverse impacts to scenic vistas and resources by requiring that developers of new facilities demonstrate that they will not impact the scenic value of a specific area. In addition, Section 20.236.025(D)9 requires that “no trees that provide visual screening of the wireless communication facility shall be removed after project completion except to comply with fire safety regulations or to eliminate safety hazards. Tree trimming shall be limited to the minimum necessary for operation of the facility.” This is the same language found in the existing Guidelines under Section B(4)e.

The proposed ordinance requires that any applicant for an Administrative Permit for a wireless communication facility submit a site plan and elevations that show how the facility will meet the requirements of the Ordinance. This process is equivalent to the required submittals in the current advisory guidelines which require visual simulations or other materials that show how the facility will appear once constructed, and how the requirements of the guidelines will be met. The proposed ordinance provides protections equal to, or more restrictive than, the existing guidelines.

In addition to the requirements of the proposed ordinance, Policy RM-132 of the current Mendocino County General Plan (2009) requires that the county, “Maintain and enhance scenic values through development design principles and guidelines” by minimizing disturbance to natural features and vegetation, and requiring that the scale and design of new developments be, “subordinate to and compatible with the setting”. Projects permitted through the Administrative Permit process must be found compatible with these policies.

Therefore, there would be **Less than Significant Impact** as a result of implementing the proposed ordinance.

I. d) Like the existing guidelines, the proposed ordinance requires new facilities to be constructed with and/or painted in subdued colors and non-reflective materials, selected to blend with their surroundings. Any new towers must not be so tall that they require Federal Aviation Administration lighting or markings. The current Mendocino County General Plan, in Policy RM-134, requires new development, “...to protect the qualities of the nighttime sky...by requiring that outdoor nighttime lighting is directed downward, ...and reduced both in intensity and direction to the level necessary for safety and convenience.” This policy, in conjunction with the provisions of the new ordinance that provide equal protection as the existing guidelines, would protect nighttime views as well as prevent new facilities from creating new sources of daytime glare.

Adoption of the proposed ordinance will allow some wireless facilities projects to be exempt from discretionary review, as outlined in the project description. Exempt facilities are generally for private use or emergency services or educational purposes. Other exempt facilities include wi-fi hotspots and minor modifications to existing facilities that have little or no change on the visual appearance. None of the exempt facilities are anticipated to generate substantial light or glare which would adversely affect daytime or nighttime view. There will be a less than significant effect on aesthetic resources related to exempt facilities.

Therefore there would be **Less than Significant Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project would have **Less than Significant Impact** on Aesthetic Resources as compared to the existing guidelines.

II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 forestland to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: Agriculture and Forestry Resources would be significantly affected by the proposed project if the project were to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (hereafter “farmland”), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses. Significant impacts to Agricultural and Forestry Resources would also occur if the project conflicted with existing zoning for agricultural use or a Williamson Act contract; conflicts with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); Result in the loss of forest land or conversion of forest land to non-forest use; or 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 forestland to non-forest use.

DISCUSSION: The proposed ordinance applies throughout the inland unincorporated areas of Mendocino County. Agricultural areas in the county consist of Timber Production Zones (TPZ), and prime and non-prime agricultural soils that support pasture land, vineyards, orchards, and some row crops (Mendocino Agricultural Commission 2013 Crop Report). Agricultural areas in Mendocino County occur primarily on the valley floors at lower elevations, and are often associated with populated areas in proximity to major roads and highways. Presently, agricultural land in Mendocino County is dominated by vineyards, followed by pear and apple orchards, row crops, and pasture (Mendocino County General Plan, Chapter 4, 2009).

A number of the Agricultural Resources and Forest Resource Policies in the Mendocino County General Plan protect agricultural and timber resources from incompatible uses, incremental land conversion and fragmentation that could undermine the integrity, and economic viability of agricultural and timber operations (Chapter 4, Policies Rm-100 through RM125). The proposed ordinance would allow specified wireless communications facilities to be permitted through the Administrative Permit process, and others

to require a Major Use Permit. These discretionary permit processes give the opportunity to ensure that proposed projects are consistent with existing land use policies and zoning regulations.

II. a) Adoption of the proposed ordinance will allow some wireless facilities projects to be exempt from discretionary review, as outlined in the Project Description. Exempt facilities are generally for private use, emergency services, or educational purposes. Other exempt facilities include Wi-Fi hotspots and minor modifications to existing facilities. Given the limited nature of the facilities that qualify for an exemption, few exempt facilities are expected to be permitted. Nearly all such facilities are expected to be associated with existing buildings or existing communication towers. The limited number of permitted exempt facilities will have a **Less Than Significant Impact** on Prime Farmland, Unique Farmland or farmland of statewide importance.

Projects that are not found to be exempt will be subject to an Administrative Permit or a Major Use Permit. This will require review for consistency with applicable General Plan policies and give the opportunity to ensure that the wireless facility is compatible with continued agricultural use. Among other policies, Policy RM-102 in the General Plan requires that the County work to protect important farmlands under the State Farmland Mapping and Monitoring Program.

While a tower and its appurtenant facilities may remove a portion of a parcel from agricultural use, the remainder of the parcels would continue to be available for agricultural production. Both the existing Guidelines and the proposed ordinance discourage the use of guy wires on towers unless compelling evidence for their need can be shown. Guy wires can significantly increase the area required for a tower and therefore restrict the agricultural use in that area. The restriction on guy wires will help to reduce the area required by new wireless facilities by reducing the overall footprint. Therefore, there would be a **Less than Significant Impact** on Prime or Unique Farmland or Farmland of Statewide Importance from implementing the proposed ordinance.

II. b) Construction of wireless communications facilities as allowed under the proposed ordinance with an Administrative Permit or Major Use Permit would not conflict with zoning for an agricultural use, nor prevent agriculture from occurring on Williamson Act parcels. Per the General Plan policies, constructing wireless communications facilities on agricultural parcels may not preclude existing or future agricultural uses.

Wireless facilities that will be exempt from discretionary review under the proposed ordinance are generally for private use, emergency services, educational purposes, Wi-Fi hotspots and minor modifications to existing facilities. These facilities are limited and would have a **Less Than Significant Impact** on agriculture or Williamson Act Contracts.

Therefore, there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

II. c&d) The proposed ordinance will not conflict with current zoning of forest land or timber production zones or result in conversion of forest land to a non-forest use.

Construction of wireless communications facilities as allowed under the proposed ordinance with an Administrative Permit or Major Use Permit would not conflict with zoning for timber production. Per the General Plan policies, constructing wireless communications facilities on parcels planned or zoned for timber must be found to not preclude existing or future timber uses.

Wireless communications facilities that will be exempt from discretionary review under the proposed ordinance are generally for private use, emergency services, educational purposes, Wi-Fi hotspots, and minor modifications to existing facilities. These facilities are limited and would have a less than significant impact on timber resources. Therefore, there would be a **Less than Significant Impact** to forest land and timber production as a result of implementing the proposed ordinance.

II. e) Because of their relatively small size in relation to TPZ parcels and other agricultural uses, wireless communications facilities do not prevent timber harvest or agricultural production from occurring on parcels where they are constructed. Policy RM-108 of the Mendocino General Plan states that:

“Discretionary projects shall not undermine the integrity and economic viability of agricultural operations by causing or contributing to piecemeal land use conversion, land fragmentation, urban encroachment, the introduction or concentration of incompatible uses on lands adjoining or within agricultural areas, or the extension of growth-inducing urban services such as public water or sewers.”

The discretionary review process for wireless communications facilities not found to be exempt requires conformance with all General Plan policies.

Wireless communications facilities that will be exempt from discretionary review under the proposed ordinance are generally for private use, emergency services, educational purposes, Wi-Fi hotspots and minor modifications to existing facilities. These facilities are limited and would result in **Less Than Significant Impact** in relation to changes in the existing environment that could result in conversion of farmland or forest land to other uses.

Therefore, there would be a **Less than Significant Impact** on land conversions as a result of implementing the proposed ordinance.

MITIGATION MEASURES: No mitigation required.

FINDINGS: The Proposed Project would have a **Less than Significant Impact** on Agricultural and Forestry Resources.

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:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on Air Quality if it conflicts with or obstructs implementation of applicable air quality plans; violates any air quality standard or contributes substantially to an existing or projected air quality violation; results 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); exposes sensitive receptors to substantial pollutant concentrations; or creates objectionable odors affecting a substantial number of people.

DISCUSSION: Mendocino County does not meet applicable state air quality standards for PM-10 (particulate matter that is 10 microns or smaller). The primary sources of PM-10 are wood combustion (wood stoves, fireplaces, and outdoor burning) and fugitive dust (Mendocino County Air Quality Management District, 2014)). In the inland areas of the county air automobile emissions, especially in the summer tourist season, are a significant source of the pollutants. To control PM-10, the MCAQMD recommends alternative heating sources to wood stoves, dust control techniques on construction sites, paving access roads or using dust suppressants for rural gravel roads (except for agricultural roads), and working to reduce traffic where possible. With the exception of the non-attainment in PM-10 standards, air quality in Mendocino County is generally considered acceptable.

III. a) The proposed ordinance does not conflict with any rules or regulations put in place by the MCAQMD. The Air District has set rules for the installation of wood stoves, but not any related to the control of PM-10. Because there are no woodstoves or other burning associated with the construction and operation of communications facilities, there would be **No Impact** as a result of implementing the proposed ordinance.

III. b) As discussed, there are no applicable adopted standards set by the MCAQMD for regulating PM-10. The MCAQMD does not meet state standards for PM-10 largely as result of fugitive dust and wood smoke from home fireplaces and stoves. Policy RM-38 states that the County shall work to “reduce or mitigate particulate matter emissions resulting from development” (Mendocino County General Plan, 2009). In addition, Policy RM-43 directs the County to “reduce the effects of earth-moving, grading, clearing, and construction activities on air quality”. The Administrative Permit process will provide opportunities for County staff to review applications to ensure that appropriate measures are taken to limit fugitive dust and PM-10 emissions from construction activities.

Construction efforts are generally short term, and operations of wireless towers are generally automated. Limited maintenance visits will not contribute substantially to air quality impacts as regular maintenance will generally require isolated visits by single vehicles. The proposed ordinance requires applicants to provide a road assessment that shows the condition of the access road prior to initiating construction. Once construction is complete, the applicant must prove to the County that any damage caused to the road from the construction effort has been repaired and that the access road is in as good or better condition than its pre-construction condition. This will help to prevent future fugitive dust impacts from damaged roads.

Wireless facilities that will be exempt from discretionary review under the proposed ordinance are generally for private use, emergency services, educational purposes, wi-fi hotspots and minor modifications to existing facilities. These facilities are limited and would have a less than significant impact on air quality standards.

Therefore, the construction and operation of wireless communications facilities would not contribute substantially to further diminishing the air quality of the County and there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

III. c) As discussed, the MCAQMD is in non-attainment for PM-10 resulting from wood combustion and fugitive dust. Operations of wireless communications facilities will not create an ongoing or permanent source of dust or other emissions that would contribute to a considerable net increase in the pollutant. Construction efforts will create some fugitive dust during construction but this will be intermittent and temporary. Therefore there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

III. d, e) Neither construction nor operation of wireless communications facilities will result in substantial pollution concentrations that could impact sensitive receptors, or result in objectionable odors. Sites in the more remote areas of Mendocino County will not impact sensitive receptors due to the rural nature of the county, and co-locating facilities or mounting antennas on roofs will not require materials or operations

that would affect sensitive receptors or create objectionable odors in the more developed parts of the county. Therefore there would be **No Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS: The Proposed Project would have a **Less than Significant Impact** on Air Quality.

IV. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact to Biological Resources if it were to 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 W or U.S. Fish and Wildlife Service; have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; 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; 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; conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or 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: Mendocino County is largely rural and forested. Mendocino County has a wide range of climates, topography, soils, and watershed conditions, all of which produce very diverse plant and animal communities. Vegetation predominant in the region includes valley grassland and oak woodland in lowlands and valleys, coastal scrub and prairies along the Pacific Ocean, and mixed chaparral, hardwood forest, and coniferous forest in the mountains (Mendocino County General Plan, 2009).

IV. a-f) Exempt facilities generally limited to placing antennas on rooftops and existing buildings and minor alterations to existing facilities would be unlikely to impact biological resources.

For wireless communications facilities that are substantial enough to be subject to an Administrative Permit or Major Use Permit, the project and site will be evaluated during the discretionary review process. Projects must be found consistent with General Plan policies, which include protection of biological resources.

General Plan Ecosystems Policies RM-24 through RM-34 protect natural landscapes by restricting conversion and fragmentation of woodlands, timberland, stream corridors, farmland, and other natural environments. General Plan Policy RM-28 requires that all discretionary public and private projects, "... that identify special-status species in a biological resources evaluation shall avoid impacts to special-status species and their habitat to the maximum extent feasible." Furthermore, the policy requires that where impacts cannot be avoided, site- or project-specific mitigation measures shall be developed to reduce the level of impact to special status species.

Policy RM-1 through RM-5 in Chapter 4 of the General Plan are focused on watershed protection. Policy RM-1 requires County staff to protect stream corridors and associated riparian habitat, and the Action Item associated with the policy requires, "...adequate buffers for all projects potentially impacting stream corridors and/or their associated riparian habitat". Federally protected wetlands would be identified as a part of the Administrative Permit process, and the existing General Plan policies, such as Policy RM-27, as well as state and federal law, require that these resources be identified and conserved.

Wildlife corridors and migration routes are protected by existing policies and action items in the current General Plan. Action Item RM-27.1 requires that the County "identify and maintain wildlife corridors to support biodiversity and healthy natural processes."

Under the proposed ordinance, roof mounted antennas may not be taller than the maximum allowed building height for the zone, nor can new antennas extend more than ten feet above the existing roof line. This, in conjunction with the limitation on guy wires, will help to prevent impacts to migratory birds.

The adoption of the proposed ordinance would not conflict with policies protecting biological resources. The discretionary approval process will provide opportunities for review of specific projects to ensure that future applications are consistent with existing General Plan policies protecting biological resources and consistent with any applicable habitat conservation plans.

Therefore, there will be a **Less than Significant Impact** to Biological Resources as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have a **Less than Significant Impact** on Biological Resources.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on Cultural Resources if it would cause a substantial adverse change in the significance of a historical resource as defined in '15064.5; cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5; directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or disturb any human remains, including those interred outside of formal cemeteries.

DISCUSSION: Wireless communications facilities that will be exempt from discretionary review under the proposed ordinance are generally for private use, emergency services, educational purposes, Wi-Fi hotspots, and minor modifications to existing facilities. These facilities are limited, require minimal, if any, ground disturbance, and would be unlikely to have an impact on historic or cultural resources.

More substantial wireless facilities will require discretionary review through an Administrative Permit or Major Use Permit. Standard discretionary permit procedures include review of internal records related to historic and cultural resources, and consultation with agencies and tribal representatives. This process allows for evaluation of potential site specific impacts or potential conflicts with historic or cultural resources.

V. a, b, & c) The adoption of the proposed ordinance would not substantially impact historic resources, archaeological resources, paleontological, or unique geological resources. Exempt projects involve limited construction or ground disturbing activities and have little chance of impacting these resources. More substantial projects will be subject to discretionary review and independently evaluated for impacts to these resources. There would be a **Less than Significant Impact** to historic, archaeological, paleontological, or unique geological resources as a result of implementing the proposed ordinance.

V. d) The adoption of the proposed ordinance does not have the potential to directly disturb human remains. Wireless communications facilities exempt from discretionary review, and those requiring an Administrative Permit or Major Use Permit are subject to state law regarding disturbance of human remains. As provided in Public Resources Code, Section 5097.98 if human remains are discovered during project construction, work must cease and the coroner must be contacted. The coroner is responsible for contacting appropriate Native American tribes.

Therefore, there would be a **Less than Significant Impact** to disturbance of human remains as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have a **Less than Significant** on Cultural Resources.

VI. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on geology and soils if it would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction, or landslides; result in substantial soil erosion or the loss of topsoil; 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; 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; or 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.

DISCUSSION: Mendocino County is located just south of the Cascadia Subduction Zone and will likely be subjected to a strong earthquake in the foreseeable future (Mendocino County General Plan, 2009). A number of faults are located throughout the county, including the San Andreas Fault in the southwest corner of the county, the Maacama Fault in the inland valley from Sonoma County to Laytonville, the Round Valley Fault in the northeastern part of the county, and the Etsel Ridge Fault in the eastern portion of the county (Mendocino County General Plan, 2009). Any structure built in Mendocino County will likely be subjected to seismic activity during its expected lifespan.

VI. a i-iv) Implementing the proposed ordinance would have a **Less than Significant Impact** on people or structures as a result of earthquakes or landslides. Building permits will be required for both discretionary and exempt projects. Building codes include provisions intended to strengthen structures against earthquakes and prevent development on untreated slopes prone to landslides.

Therefore, there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

VI. b) The adoption of the proposed ordinance would not contribute to substantial erosion or loss of topsoil. Wireless communications facilities that will be exempt from discretionary review under the proposed ordinance are limited in size and purpose, and would require minimal, if any, ground disturbance. Exempt facilities would be unlikely to result in a substantial erosion or loss of topsoil. For wireless communications facilities found to be subject to discretionary review, projects must be found consistent with policies in the General Plan. Specifically, policies RM-59 through RM-64 protect soil resources and require that discretionary projects promote soil conservation practices and require that development, "...shall be located, designed, constructed, and managed ...to protect soil resources, and minimize soil loss and erosion" (Policy RM-61) (Mendocino County General Plan, 2009). Therefore, there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

VI.c & d) The ordinance will not result in wireless communications facilities being built on a geologic unit or soils that are unstable or that would become unstable as a result of construction or located on expansive soils. Building permits will be required for both discretionary and exempt projects. Building codes include provisions intended to ensure structures and their foundations are engineered to be suitable for the geologic zone and soil types in which they are located. Therefore, there would be **No Impact** as a result of implementing the proposed ordinance.

VI.e) Adoption of the proposed ordinance would have no impact on wastewater disposal or onsite septic systems. Wireless communications facilities do not typically involve the construction of restrooms or other facilities that would generate wastewater. Therefore, there would be **No Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have a **Less than Significant Impact** on Geology and Soils.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on Greenhouse Gas Emissions if it would generate greenhouse gas emissions (GHG), either directly or indirectly, that may have a significant impact on the environment; or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

DISCUSSION: Because Mendocino County is primarily rural, the amount of greenhouse gases (GHG) generated by human activities, primarily the burning of fossil fuels for vehicles, heating, and other uses, is small compared to other, more urban counties. (Mendocino General Plan, 2009).

VII. a) The adoption of the proposed ordinance would have a **Less Than Significant Impact** on greenhouse gas emissions. Construction activities associated with wireless communications facilities can generate GHGs from the engine emissions of construction equipment, but these activities are limited in scope and duration and would not contribute significantly to greenhouse gas emissions. Therefore there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

VII. b) Mendocino County's General Plan focuses on energy development and energy policy in its response to GHGs. Because the construction or expansion of existing wireless communications facilities will not require additional energy development or create a need for additional energy generation facilities, there would be **No Impact** as a result of the proposed project.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The project will have **Less than Significant Impact** on Greenhouse Gas Emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on hazards and hazardous materials if it were to 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; emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or 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, it would create a significant hazard to the public or the environment. In addition, for projects 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, the project would result in a safety hazard for people residing or working in the project area; if the project is within the vicinity of a private airstrip, the project would result in a safety hazard for people residing or working in the project area. Finally, the project would have a significant impact to hazards and hazardous materials if it would impair the implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan; or expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands.

DISCUSSION: Wireless facilities do not require the routine transport, use, or disposal of hazardous materials. Some sites may use diesel generators as a backup power source, which requires fuel to be stored on site. Batteries are often used on site to ensure a consistent power supply in the event of a power outage in the time between when grid power is lost and the backup generators come on line.

VIII. a, b) The construction and operation of wireless communications facilities does not require the routine use, transport, or handling of hazardous materials. Depending on the nature of the site, diesel or gasoline may be stored to power onsite generators. These would be contained according to applicable regulations. These would not create significant hazard to the public, or the environment, through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, because the amount of fuel stored would be relatively small and tanks would be contained as required by applicable laws. Facilities placed on existing buildings would likely not require additional power sources or fuel supplies. There would be **No Impact** as a result of implementing the proposed ordinance.

VIII. c) There are no emissions, such as exhausts or chemicals, or materials, substances, or waste associated with wireless communications facilities that could present a health hazard to nearby residents, with the exception of radio frequency radiation. However, the proposed ordinance states in section 20.236.025 (A)4 that “the combined level of radio frequency radiation for all arrays shall not exceed the maximum permissible exposure level set by the Federal Communications Commission.” Furthermore, section 20.236.025(D)3 states that “every wireless communication facility, by itself and in combination with other nearby wireless communications facilities, shall comply with the Federal Communications Commission’s limits for human exposure to radio frequency electromagnetic fields.” This applies to both new wireless installations and cumulative increases in radio frequency radiation resulting from new additional antennas being co-located on existing facilities. There is no evidence that radio frequency radiation within the limits established by the Federal Communications Commission presents a health or safety risk. Therefore, there would be a **Less than Significant Impact** from emissions as a result of implementing the proposed ordinance.

VIII. d) The proposed ordinance would be applicable to all inland unincorporated areas of Mendocino County. There is no human habitation related to wireless communications facilities. After construction maintenance visits to wireless communications facilities are typically intermittent. Should a wireless communications facility be proposed on a site that is included in the list of hazardous materials sites, compiled pursuant to Government Code Section 65962.5, it is unlikely to result in a significant hazard to

the public or the environment. Therefore, there would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

VIII. e,f) The proposed ordinance would be applicable to all inland unincorporated areas of Mendocino County. Areas of the county that are within the established flight zones of air strips are subject to the regulations contained in the Mendocino County Airport Comprehensive Land Use Plan. Specific compatibility zones near airports may require additional restrictions on height. These additional restrictions would be reflected in the zoning for a parcel. Both exempt wireless communications facilities and those requiring discretionary review would be reviewed for compliance with zoning. There would be **No Impact** as a result of implementing the proposed ordinance.

VIII. g) The Proposed Project would not have an effect on the execution of emergency response plans or evacuation plans. There would be **No Impact** as a result of implementing the proposed ordinance.

VIII. h) New communications facilities could be exposed to wildland fires due to the fact that such facilities are often built at the edges of developed areas. However, areas around these facilities are often cleared of vegetation, which can reduce the risk of damage by fire. In addition, these remote facilities are not manned and therefore will not routinely expose workers to increased risk from wildfire. Facilities placed on buildings and roofs will be subject to rules and regulations for defensible space and fire suppression systems. There will be a **Less than Significant Impact** as a result of the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS -The project will have a **Less than Significant Impact** on Hazards or Hazardous Materials.

IX. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Result in inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on hydrology and water quality if it would violate any water quality standards or waste discharge requirements; 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); substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site; 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, which would result in flooding on- or off-site; 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, or otherwise substantially degrade water quality. Significant impacts would also occur if the project would place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map; place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map or other flood hazard delineation map; place within a 100-year flood hazard area structures, which would impede or redirect flood flows; expose people or structures to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or result in inundation by seiche, tsunami, or mudflow.

DISCUSSION: The adoption of the proposed ordinance would not have any impact on water quality, groundwater recharge, or expose people or structures to risk from tsunami, mudflow, or seiche. The construction regulated by the proposed ordinance is also unlikely to impact water quality. Antennas proposed on existing buildings or co-located on existing towers would not change drainage patterns compared to the existing condition. New wireless communications facilities, such as communications towers, create a minimal amount of impervious surface as compared to the area around them. In the mostly rural areas of inland Mendocino County, the relatively small size of new towers would preclude significant impacts to hydrology or water quality.

IX.a) New facilities are unlikely to violate water quality standards based on the small amount of impervious surfaces associated with new communications facilities. Co-located facilities will have no impact on impervious surface as compared to the existing condition, and antennas attached to existing building or located on roofs will not change building footprints. There are no water quality standards that would be violated by construction of new facilities. Large sites (over an acre) that will be graded would be required to obtain Stormwater Pollution Prevention Plans (SWPPP). Wireless communications facilities do not generate wastewater, and therefore will have no impact on wastewater discharge requirements. Therefore there would be **No Impact** as a result of implementing the proposed ordinance.

IX. b) Wireless communications facilities do not require groundwater to operate, and are unlikely to significantly alter groundwater recharge given the small impervious footprint associated with facilities. Therefore there would be **No Impact** as a result of adopting the proposed ordinance.

IX. c,d,e,&f) As discussed, the construction of new wireless communications facilities are not likely to substantially alter the drainage pattern of the site they are constructed on. The small amount of impervious surface would not contribute substantially to additional runoff to a municipal or county operated storm drain system, nor would they create polluted runoff. As discussed, because of the small impervious footprint of these types of facilities, and the fact that water is not necessary for their operation, it is unlikely that any water quality impacts would occur as a result of these facilities. Antennas located on buildings or rooftops would not alter drainage patterns around the buildings they would be mounted on. For larger, non-exempt wireless facilities, the discretionary review process would provide opportunities to address any potential water quality issues and storm drain impacts associated with a particular site. There would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

IX. g,h,&i) New housing is not associated with the construction of wireless communications facilities. If communications facilities are proposed to be placed on new housing, the building requirements associated with the construction of the building would address flood plain impacts. The ordinance requires that “antennas, connections, and supports shall be located on a legal structure that has obtained all necessary permits”. All new wireless facilities will require building permits, the issuance of which is dependent on demonstrating compliance with applicable federal flood regulations. **No impact** would occur.

IX. j) The proposed ordinance would not apply within the coastal zone. Therefore, there would be no risk to future installations from tsunamis. The Proposed Project would not involve any alterations that would increase the potential for inundation by seiche or mudslide. **No impact** would occur.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Hydrology and Water Quality.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant effect on Land Use and Planning if it would physically divide an established community; 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; or Conflict with any applicable habitat conservation plan or natural community conservation plan.

DISCUSSION: The proposed ordinance would apply to the unincorporated inland areas of Mendocino County. Wireless communications facilities that will be exempt from discretionary review under the proposed ordinance are limited in size and purpose and must be consistent with the height limits of the

zone in which they are proposed. More substantial wireless communications facilities will require discretionary review and be evaluated for conformance with applicable General Plan policies, zoning regulations and subject to review under CEQA

X. a-c) Adopting the proposed ordinance would not physically divide an established community nor conflict with any applicable habitat conservation plan or natural community conservation plan. The ordinance would establish additional County code and not conflict with any existing County land use plan or policy. There would be **No Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The project will have **No Impact** on Land Use and Planning.

XI. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on mineral resources if it would 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, or 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: A variety of minerals resources are known to exist in the county. The most predominant minerals found in Mendocino County are aggregate resources, primarily sand and gravel. Three sources of aggregate materials are present in Mendocino County: quarries, instream gravel, and terrace gravel deposits.

XI. a-b) The adoption of the proposed ordinance would not conflict with existing mineral resource operations. Proposed communications facilities would be sited as to prevent conflicts with existing operations as directed by Action item RM-65.1 and Policy RM-66. Due to the generally small size of communication facilities, it is unlikely that a single facility would result in the loss of availability of a locally important mineral resource. Therefore there would be **No Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES-No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Mineral Resources.

XII. NOISE. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Expose persons to or generate excessive ground borne vibration or ground borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would create a significant impact from Noise if it would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; expose persons to or generate excessive ground borne vibration or ground borne noise levels; result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; 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; or 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

DISCUSSION: Major noise sources in Mendocino County consist of highway and local traffic, railroad operations, airports, commercial and industrial uses, and recreation and community facilities. Highways with traffic that generate significant noise include U.S. Highway 101 and the State Routes (1, 20, 128, 162, 175, and 253). The only active railroad operation in Mendocino County is the Skunk Train passenger line, which runs between the cities of Fort Bragg and Willits. Public use airports are located in or near Ukiah, Willits, Covelo, Boonville, Gualala, and Little River. Major industrial noise sources are primarily lumber mills and timber products facilities.

XII. a,& b) Adopting the proposed ordinance would not expose persons to or generate noise levels in excess of standards established in the local General Plan or noise ordinance. Installing antennas on buildings or roofs, or co-locating antennas on existing structures would not create excessive ground borne vibration or ground borne noise. Construction of new wireless communications facilities, such as cell towers, could create ground borne vibration and noise, but this would be temporary and would no longer effect nearby receptors once construction was finished. There would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

XII. c) Wireless communications facilities do not create significant noise or vibration in the course of normal operations. Some facilities may propose the use of diesel or gasoline generators as back-up power sources in the event of a power outage. The proposed ordinance contains language in sections 20.236.025(B)6 and 20.236.025(B)10 that prevents the use of these generators unless the applicant can demonstrate that the generators will be inaudible beyond the boundaries of the property containing the wireless facility. Therefore, there will be **No Impact** as a result of the proposed ordinance.

XII. d) The operation of wireless communications facilities would not increase periodic ambient noise levels in the project vicinity. Antennas or other facilities located on buildings or roofs would not expose occupants to increased noise levels. Construction could increase noise levels temporarily during the construction period. There would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

XII. e,f) Once construction is completed, operations at wireless communications facilities would be automated and require minimal and periodic maintenance. Workers would not be subjected to excessive noise levels from public or private airstrips. Construction workers may be exposed to higher ambient noise levels, but construction efforts are short term and workers are expected to comply with occupational safety regulations and wear proper safety equipment. There would be a **Less than Significant Impact** as a result of implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have a **Less than Significant Impact** on Noise.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact to population and housing if it would induce substantial population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure); displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

DISCUSSION: Wireless communications facilities are an important component of communication and emergency infrastructure. Wireless communications facilities addressed in the proposed ordinance are intended to support the communication needs of the existing and future population of Mendocino County. The ordinance does not induce policies that would induce population growth.

XIII. a-c) The adoption of the proposed ordinance would not induce population growth. Wireless communications facilities will support existing and future communication needs. The ordinance does not encourage, promote, or otherwise incentivize the construction of wireless communications facilities. The adoption of the proposed ordinance, construction of new facilities, or the co-location of new antennas on

existing facilities would not displace people or housing. There would be **No Impact** as a result of the implementing the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Population and Housing.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on Public Services if it would 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, including fire and police protection, schools, parks, and/or other public facilities.

DISCUSSION: The proposed ordinance exempts from discretionary review communications facilities exclusively used for the provision of emergency services and for education facilities. This will allow these entities to construct facilities as needed to provide adequate coverage and service.

XIV. a-e) The construction of wireless communications facilities is unlikely to impact parks or other recreational and public facilities. Government facilities are exempt from discretionary review if the proposed wireless communications facilities are intended to protect the public’s health, safety, and welfare. Nothing in the ordinance interferes with fire or police protection. Nothing in the ordinance generates the need for physical changes to parks, schools, or other public facilities. Therefore, there would be **No Impact** as a result of adopting the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Public Services.

XV. RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on Recreation if it would 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; or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

DISCUSSION: The proposed ordinance would not incur population growth or changes in the use of existing recreational facilities.

XV. a-b) There would be no impacts to recreation as a result of implementing the proposed ordinance. The construction of wireless communications facilities would not increase the use of neighborhood or regional parks, or contribute to substantial physical deterioration of any facilities. Recreational facilities would not be built or need to be built as a result of implementing the ordinance or constructing additional communications facilities as regulated by the proposed ordinance. There would be **No Impact**.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Recreation.

XVI. TRANSPORTATION / TRAFFIC. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestions management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on Transportation and Traffic if it would 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; 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 congestions management agency for designated roads or highways; 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; substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); result in inadequate emergency access; or conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

DISCUSSION: The proposed ordinance clarifies how and where wireless communications facilities could be built and located. The ordinance does not encourage, promote, or otherwise incentivize the construction of new wireless communications facilities. Traffic related impacts of wireless communications facilities are minimal and limited to construction. The adoption of the ordinance would not increase the overall demand for wireless communications facilities.

XVI. a, b) The proposed ordinance would not conflict with an applicable plan, ordinance, or policy that establishes measures of effectiveness for the local circulation system, nor would it conflict with a congestion management program. There would be **No Impact** as a result of implementing the proposed ordinance.

XVI. c) Towers constructed under the proposed ordinance would not change or create an increase in air traffic patterns. Any towers tall enough to be subject to FAA lighting would require discretionary review and would need to demonstrate that they do not pose a safety risk to air traffic. There would be **No Impact** as a result of adopting the proposed ordinance.

XVI. d) The adoption of the ordinance does not increase the potential for wireless facilities to increase transportation hazards due to design features or incompatible uses. There would be **No Impact** on road hazards and design.

XVI. e,f) The proposed ordinance would not result in inadequate emergency access or conflict with adopted policies, plans, or programs regarding public transit. Emergency service providers applying to build communications facilities for the provision of those services are exempt from discretionary review under this ordinance. There would be **No Impact** on emergency access and public transit.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on transportation and traffic.

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

THRESHOLDS OF SIGNIFICANCE: The project would have a significant impact on Utilities and Service Systems if it would exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; 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; have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed; 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; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; not comply with federal, state, and local statutes and regulations related to solid waste.

DISCUSSION: Wireless communications facilities do not require water, wastewater, or solid waste service. New towers in Mendocino County are unlikely to be in urbanized areas where storm water runoff would be an issue. Once construction is completed on new facilities there would be no solid waste generated, or require additional water required for operations.

XVII. a-g) Because wireless communications facilities require no water, wastewater, or solid waste service to operate, there would be **No Impact** to utility systems as a result of the proposed ordinance.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on utilities and service systems

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

XVIII. a) Based on the findings in this Initial Study, the proposed ordinance will have a **Less than Significant Impact** related to the potential to degrade the quality of the environment, substantially reduce habitat values, or otherwise impact listed species. The project will not eliminate important examples of California history or prehistory.

XVIII. b) No cumulative impacts have been identified as a result of the proposed ordinance. The proposed ordinance does not encourage, promote, or otherwise incentivize the construction of wireless communications facilities. No impacts over the current baseline are anticipated.

XVIII. c) Based on the findings in this Initial Study, the proposed ordinance will not have environmental effects that will cause substantial adverse effects on human beings either directly or indirectly.

MITIGATION MEASURES- No mitigation required.

FINDINGS- The Proposed Project will have **No Impact** on Mandatory Findings of Significance